

# ADEQ

ARKANSAS  
Department of Environmental Quality

July 16, 2012

Trey Lieblong  
Environmental Coordinator  
Conway Corporation  
P.O. Box 99  
1307 Prairie Street  
Conway, Arkansas 72033

Re: City of Conway (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 June 19<sup>th</sup> through June 21<sup>st</sup>, 2012. 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: Craig Uyeda/Enforcement Branch Manager  
Eric Fleming/Inspector Supervisor  
Rudy Molina/EPA 6WQ-PP

**PRETREATMENT AUDIT  
REPORT FOR THE CITY OF  
CONWAY, ARKANSAS  
NPDES PERMIT #AR0051951**

**July 11, 2012**

**PREPARED BY:**

**ALLEN GILLIAM**

**STATE PRETREATMENT COORDINATOR**

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY**

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## **LIST OF ATTACHMENTS**

Pretreatment Program Audit Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation

## ***A) INTRODUCTION***

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

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

An audit/assessment was performed June 19 through June 21, 2012, of the Pretreatment Program implemented by the City of Conway (Conway Corporation), Arkansas. Participants included:

Allen Gilliam	ADEQ / State Pretreatment Coordinator
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 City of Conway'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 of Conway'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. "The City" and "Conway Corp. (CC)" may be used interchangeably throughout this report.

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 sent to public notice, approved and incorporated by reference into their NPDES permits on 6/2/88.

The most recent streamlining modifications were received by this office on 4/18/11. Their Pretreatment Ordinance was approved on 1/23/12 and adopted by the City on 2/28/12. Their Pretreatment Program narrative was submitted on 2/13/12. It did not include a section regarding local limits and remains to be reviewed for recommendations and comments. Several other City Pretreatment Programs were sent to CC's Environmental Coordinator for his review and possible use.

The local limits' section of their Pretreatment Program is awaiting ADEQ's spreadsheet calculations using Conway's site specific data which has been previously submitted.

The Stone Dam Creek POTW currently receives all of the City's significant industrial discharges. Seventeen (17) SIUs constitute approximately 12% of its average flow of 3.5 MGD. Seven (7) of these SIUs are metal finishing (categorical) industries.

Its treatment process consists of equalization, two primary clarifiers, two aeration basins with return activated sludge, two final clarifiers followed by coal and sand filtration, then post aeration (as needed). Chlorine disinfection is followed by de-chlorination before discharge.

An estimated 285 dry metric tons of anaerobically digested and thickened sludge from the secondary digester was land applied during the last year.

The Tucker Creek POTW receives no SIU wastewater. The POTW's average daily flow is 5.1 MGD. Wastewater treatment at this POTW consists of augers with two (2) lagoons consisting of four partial mix aerated cells with additional mechanical aerators currently being added. Sludge is allowed to accumulate in the lagoons.

A third wastewater treatment plant (Tupelo Bayou) is currently under construction. It is estimated it will be complete near the year's end of 2014, if not earlier. Stone Dam Creek's wastewater plant will be decommissioned with its wastewater pumped to Tupelo Bayou. Tucker Creek's POTW may remain in operation for years after Tupelo Bayou become operational. All wastewater flow from the City of Conway will eventually be treated by the Tupelo Bayou POTW and discharged to the Arkansas River.

The audit/assessment consisted of informal discussions with the Conway Corporation's (CC) Pretreatment personnel, examination of industrial user files, pretreatment records and site visits at four (4) 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 Attachment(s) A.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by 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 the City's current ***Pretreatment Ordinance # 0-12-08, Section 4.2.4(10)***, "All wastewater discharge applications...must be signed by an Authorized Representative...and contain the certification statement in 4.2.2(2)" [40 CFR 403.6(a)(2)(ii)]

**1b)** Under the City's old ***Pretreatment Ordinance # 0-02-122, Section 4.2.2(2)*** (dated 8/13/02), "All Industrial Wastewater Questionnaires [Applications] must contain the following certification statement [40 CFR 403.6(a)(2)(ii)] and signed by an authorized representative...".

During the file review, neither the certification statement nor the "authorized representative's" signature could be found. See Attachment A-3 for example. CC must enforce this application provision.

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

During the file review the IU inspection template was adequate, but questions were mostly answered by checking a "yes" or "no" box. Some answers referred to, "See Attached" when there was nothing attached. See Attachment A-4 for example.

The inspection reports should be more narratively detailed (utilizing what is required from the IUs' applications mentioned above and the fact sheets that will be mentioned in the Recommended Actions' Section of this Audit). Once a comprehensive inspection is on file, it can be used as a template for future ones. Upon commencement of an inspection, one of the first questions to be asked should be, "Has there been any process, raw material, etc. changes since the last inspection?"

A section should be included with questions asking about the IU's Pollution Prevention and best management practices. Some of CC's metal finishers are practicing state of the art P2 activities.

Remarks during the Audit made to the CC's Pretreatment reps. were that if all of this Audit's checklist items (See Checklist Section III, D.9.a. through D.9.q.) could be "checked off" as narratively described in the inspection itself, he could feel fairly comfortable that a comprehensive

inspection had been conducted. Once the City is comfortable they have a comprehensive inspection, it could be formally typed up, electronically filed and used as the template for subsequent inspections without having to spend time re-writing what is already on file.

The City inspector's as well as the industry representative's signature should also be included on all inspections.

**3a)** Under the City's old *Pretreatment Ordinance # 0-02-122, Section 4.2.6*, "The User shall apply for a permit re-issuance a minimum of a minimum of sixty (60) days prior to the expiration date of the user's existing permit". This language is the same in the City's current Pretreatment Ordinance, Section 4.2.9.

**3b)** Standard permit language (See Attachment A-2g) states, "The permittee must reapply for re-issuance of the permit at least 180 days prior to the expiration date".

This language must be corrected to reflect what is now included in the City's current Pretreatment Ordinance for permit re-issuance.

It was discovered during the file review that permit applications (at least for the four [4] reviewed) were received closer to thirty (30) days prior to their permit expiration date. See Attachment A-3 for example. Only a "received date" stamp was found on the application.

The City must enforce the application time requirements.

**3c)** CC's Environmental Coordinator indicated the SIU permits were standardized template-wise as far as Reporting requirements and Standard Conditions. The four (4) files reviewed during this permit indicated the IU's "...permit comes due for review on 1/1/12. The permittee must reapply for re-issuance of the permit at least 180 days prior to the expiration date." See Attachment A-2g, #13 for example.

The City must correct this provision to coincide with the current Pretreatment Ordinance's requirements.

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

1) Recommend issuing Conway's landfill leachate a permit. This source of wastewater could be a significant source of toxic pollutants. It is recommended to require them to initially provide a full

priority pollutant scan (40 CFR 122, Appendix D, Tables II & III) to ascertain which parameters may need closer scrutiny. There may be pollutants found where “report only” should be placed into their requirements to determine which, if any, pollutants need to be included in the local limits (if necessary) allocation scheme.

2) Conway Corp. should send the permitted industries their old schematics, narrative process description and the City’s fact sheets developed for them and, ask the industry representatives to comprehensively review, update and revise to reflect its current operations and process/pretreatment equipment layout AND wastewater flow to the final discharge/sampling point. A revision date should also be noted on the documents.

3a) Under 40 CFR 403.8(f)(1)(B)(3), “...individual...control mechanisms must be enforceable and contain, at a minimum, the following conditions: (3) Effluent limits...categorical Pretreatment Standards, local limits...”.

3b) During the file review of four (4) of the City’s Metal Finishers, their limitations page did not include footnotes or any rationale for inclusion of local limits.

Footnotes should be included on the limitations page denoting what the parameters are based on. The “current” local limits’ rationale could not be produced, but this Auditor recognized them as pre-1989 ADPC&E “guidance” local limits. CC’s metal finishing “local limits” could be footnoted as “based on pre-1989 ADPC&E guidance local limits” to better explain their basis.

3c) During the file review of the four (4) of the City’s Meal Finishers, footnotes on their monitoring page for TTOs did not match the parameters they were supposed to. This led to some confusion since these footnotes applied to BOD, TSS and O&G. It is recommended to revise this page.

4) Conway Corp. should complete their IU fact sheets. See Attachment A-5 for current example. While the template is adequate, they were lacking some pertinent information. Other items that should be included in the fact sheets are: the date of the industry’s first discharge; compliance history; a picture and narrative describing the sampling point; rationale for permit limits and type/frequency (if batch) of each wastewater source discharge. These fact sheets should also be dated as to when they were last updated.

CC’s Environmental Coordinator was previously sent a good example of another city’s fact sheet. See also EPA’s “Industrial User Permitting Guidance Manual” (9/89), Appendix I at <http://www.epa.gov/npdes/pubs/owm0017.pdf> for more information that may be considered in a more comprehensive fact sheet.

5) It was determined during the Audit approximately 275 industry/non-domestic user notifications were recently sent out requesting information regarding toxic/hazardous waste on-site and/or disposal methods. CC’s Environmental Coordinator also indicated any new business connections or plumbing modifications have to be routed through his office for review and possible follow-up



investigation.

Under 40 CFR 403.8(f)(2)(i), “[CC] shall identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request;

This “compilation” could not be produced during the Audit. A multitude of folders was offered. It is recommended CC summarize the results of the above mentioned “survey” and digest the pertinent information received for review upon request. See Chapter 2 of EPA’s “Guidance Manual for POTW Pretreatment Program Development” and its tables at <http://www.epa.gov/npdes/pubs/owm0003.pdf> for more information regarding this master/summary list.

6) Recommend including the general and specific prohibitions [40 CFR 403.5(a)(1) and 403.5(b)] in the septage haulers’ permits. See Attachment A-1 for CC’s current “permit” to their waste haulers.

7) Recommend clarifying what is expected of the “grab method” in CC’s IU permits (Attachment A-2b, footnote \*2). Does this mean a series of equally (time) spaced grab samples over the discharge period or is it just one grab sample?

8) Recommend clarifying what is expected of “composite samples” (see Attachment A-2b, footnote \*3). CC’s Environmental Coordinator indicated all “composites” were timed. This should be better explained in the permits in case a permitted industry decided to take its own “composite sample” and mistakenly uses a flow proportioned composite.

9) 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 Linko’s 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.

This SOP should also include sampling protocols for each permitted IU with proper equipment preparation, hose usage/change-out period and storage after use. See EPA’s “IU Inspection and Sampling Manual for POTWs” dated 4/94 for more details.

10) Recommend revising the existing Enforcement Response Plan to include “Pollution Prevention Audits by a qualified Professional Engineer and implementation of recommendations thereof”. This would add another enforcement option to choose from.

11) Pollution Prevention (P2) and Best Management Practice (BMP) questions should be included

as a section in the applications as well as the IU survey questionnaires.

12) 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. This is being conducted at numerous Pretreatment cities throughout the state and is received with appreciation by the industries. Much information can be shared at meetings such as this.

13) As a public service, articles could be sent to the local newspaper to provide further outreach to the public at large. Topics from grease, pharmaceuticals, wastewater plant and collection system information would help the general public be more aware of what part they can play in protecting its investment in the publicly owned treatment plants.

***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***

The City's Pretreatment Program and its required modifications have been submitted and are currently pending review and comments from ADEQ's Pretreatment personnel. As mentioned previously, their Pretreatment Ordinance has been approved and adopted.

\* \* \* \* \*

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 . . . . .	Pages 1-8
Section II:	Pretreatment Program Analysis . . . . .	Pages 9-19
Section III:	Industrial User File Evaluation . . . . .	Pages 20-27

### 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: 501.548.3026 FAX NUMBER: 501.450.6061

Pretreatment Contact: Trey Lieblong Title: Environmental Coordinator  
Address: same  
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 footnote on next page)  
Month Annual Pretreatment Report Due: April  
Pretreatment Year Dates: Jan 1 - Dec 31 Date(s) of Audit: 6/19 - 21/12  
(ASSESSMENT)

Inspector(s) :

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
<u>Allen Gilliam</u>	<u>State Pret. Coordinator / ADEQ</u>	<u>501.682.0625</u>

Control Authority representative(s) :

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>*Trey Lieblong</u>	<u>Environmental Coordinator</u>	<u>Same</u>
<u>Kenny Beaty</u>	<u>Lab Supervisor</u>	<u>548.3074</u>

\* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>5/5/10</u>	<u>"Satisfactory"</u>

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?

.....

Conway Corporation's "Streamlining" submittal for revisions to their Pretreatment Ordinance was received 1/18/08. No other program elements that need revision was sent.

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 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. It did not include a section regarding local limits and remains to be reviewed for recommendations and comments. Some other City Pretreatment Programs were sent to him for his review and possible use.

The local limits' section of their Pretreatment Program is awaiting ADEQ's spreadsheet calculations using Conway's site specific data which has previously submitted.

**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 (under construction)	2/1/12	1/31/17
AR0033359	Stone Dam Creek	11/1/09	10/31/14
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 (under construction)  
Location Address: 1405 Lollie Road

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 16 MGD; Actual (Avg)- N/A MGD

Sewer System: 100 % Separate; SSOs due to grease blockages N/A

**Industrial Contribution to this Treatment Plant**

# of SIUs: N/A # of CIUs: N/A  
Industrial Flow (mgd): N/A Industrial Flow (%) : N/A %

**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; fishable/swimmable; propagation of species of desirable fish; raw water source (public and 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:
<input type="checkbox"/> Land Application	<input type="checkbox"/> dry metric tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Monofill	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Public Distribution	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Lagoon Storage	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Other (specify)	<input type="checkbox"/> dry tons/yr.

List of toxic pollutant in its in NPDES permit: conventionals, T. Phos. & Nitrate + Nitrite Nitrogen

**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:     N/A      
 Issuance Date:                       
 Expiration Date:                     

List pollutants that are specified in current sludge permit:  
"Sewage sludge from treatment works treating domestic sewage (TWTDS) must meet the applicable provisions of 40 CFR Part 503"

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?)     N/A    

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>    0    </u>	<u>    0    </u>	<u>    0    </u>	<u>    0    </u>
Priority **	<u>    0    </u>	<u>    0    </u>	<u>    0    </u>	<u>    0    </u>
Biomonitoring	<u>    0    </u>	<u>    0    </u>	<u>    0    </u>	<u>    0    </u>
TCLP	<u>    0    </u>	<u>    0    </u>	<u>    0    </u>	<u>    0    </u>
Other: <u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>	<u>                    </u>

\* 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.

W.W. treatment plant is under construction

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)

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>    N/A    </u>	<u>                                    </u>
<u>                                    </u>	<u>                                    </u>
<u>                                    </u>	<u>                                    </u>

YES NO  
   N/A Has the treatment plant sludge violated the TCLP Test?

**SECTION I: GENERAL INFORMATION**

**2. Individual Treatment Plant Information**

a. Name of Treatment Plant: Stone Dam Creek  
Location Address: 900 Stanley Russ Road

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 6 MGD; Actual (Average)- 3.53 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): 0.43 Industrial Flow (%): 12.1 %

Level of Treatment

Type of Process(es):

Primary	<input checked="" type="checkbox"/>	<u>equalization basins; 2 primary clarifiers; grit removal; 2 aeration basins/RAS; chemical (lime) treatment</u>
Secondary	<input checked="" type="checkbox"/>	<u>2 final clarifiers; filtration through crushed coal &amp;</u>
Tertiary	<input checked="" type="checkbox"/>	<u>sand; sludge thickeners; post aeration (as needed)</u>

Method of Disinfection: chlorination

Dechlorination  YES  NO

Effluent Discharge

Receiving Stream Name: Stone Dam Creek to Lake Conway  
Receiving Stream Classification: Segment 3F of the Arkansas River  
Receiving Stream Use: secondary contact recreation; raw water source for domestic; industrial and ag. supplies; propagation of desirable species of fish and other aquatic life

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

Method of Sludge Disposal:	Quantity of Sludge:
<input checked="" type="checkbox"/> Land Application	<u>285</u> dry metric tons/yr.
<input type="checkbox"/> Incineration	<u>      </u> dry tons/yr.
<input type="checkbox"/> Monofill	<u>      </u> dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	<u>      </u> dry tons/yr.
<input type="checkbox"/> Public Distribution	<u>      </u> dry tons/yr.
<input type="checkbox"/> Lagoon Storage	<u>      </u> dry tons/yr.
<input type="checkbox"/> Other (specify)	<u>      </u> dry tons/yr.

\* From 1/1/11 to 12/31/11

List of toxic pollutant in its in NPDES permit: conventionals, TRC, NH3-N, TP, Cu & Zn

**SECTION I: GENERAL INFORMATION**

a. (continuation of individual treatment plant information for

Stone Dam 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: ADEQ (4853-WR-2)  
 Effective Date: 6/1/12  
 Expiration Date: 5/31/17

List pollutants that are specified in current sludge permit:  
CFR 503 parameters and requirements

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 lethality shown to the water flea on 9/11 and sub-lethal effects to the water flea on 9/11, 1/12 and 2/12. Retests passed and there is no TRE in affect.

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>12</u>	<u>12</u>	<u>12</u>	<u>0</u>
Priority **	<u>1</u>	<u>1</u>	<u>0</u>	<u>0</u>
Biomonitoring	<u>0</u>	<u>6</u>	<u>0</u>	<u>0</u>
TCLP	<u>0</u>	<u>0</u>	<u>1</u>	<u>0</u>
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)

pH on 3/31/12 & 4/30/11  
TRC on 10/31/11

Rain event  
Maintenance error

YES NO  
  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)- 5.1 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	<u>0</u> dry tons/yr.
_____ Incineration	_____ dry tons/yr.
_____ Monofill	_____ dry tons/yr.
_____ Mun. Solid Waste Landfill	_____ dry tons/yr.
_____ Public Distribution	_____ dry tons/yr.
<u>✓</u> 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?) Lethal and sub-lethal affect were shown on the fathead minnow on 7/11 and sublethal affects on the water flea on 12/09. Retests passed. NO TRE.

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>12</u>	<u>12</u>	<u>0</u>	<u>0</u>
Priority **	<u>1</u>	<u>1</u>	<u>0</u>	<u>0</u>
Biomonitoring	<u>0</u>	<u>4</u>	<u>0</u>	<u>0</u>
TCLP	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
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 it's NPDES Permit either for effluent limits or sludge over the last 12 months?

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

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>12 BOD from 5/11 - 3/12</u>	<u>Excess loading and/or algae</u>
<u>FCB on 5/31/11 &amp; 6/30/11</u>	<u>Low pH</u>

YES NO  
  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:**

<u>Date Approved by ADEQ</u>	<u>Ordinance Citation/ Nature of Modification</u>	<u>Date Incorporated in NPDES Permit</u>
<u>1/23/12</u>	<u>Streamlined Ord. Mods only.</u>	<u>n/a</u>

**2. Modifications in Progress:**

<u>Date Requested</u>	<u>Nature of Modification</u>
<u>4/01</u>	<u>Streamlining revisions were received by this office on 4/11 (Ord. only). A somewhat formal request is in their file referencing their ERP, Ordinance and MAHLs although there's another TBLL revision from the City dated 5/02.</u>

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 [WENDB-PTIM]  
 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

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: \_\_\_\_\_

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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<sup>2</sup>) 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

<input type="checkbox"/> Updating industrial waste survey	N/A
<input type="checkbox"/> Notification of IUs	
<input type="checkbox"/> Permit issuance	
<input type="checkbox"/> Receipt and review of IU reports	
<input type="checkbox"/> Inspection and sampling of IUs	
<input type="checkbox"/> Assessment of IUs for P <sup>2</sup> activity	
<input type="checkbox"/> Analysis of samples	
<input type="checkbox"/> Enforcement	
<input type="checkbox"/> 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			

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

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 connection goes thru Pret. from the engineering department". In '09 ~275 IU notifications (surveys) were sent haz waste generators, dentists, drs, chiropractors, machine shops, etc. requesting information on where their "process" w.w. was disposed of.

If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> 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<sup>2</sup> activity and the distribution of P<sup>2</sup> reference materials to the IUs which qualify?

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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) any new business connections are sent thru Pret.
- 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:

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

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) [WENDB-SIUS]
  - b. 7 Categorical Industrial Users (CIUs) [WENDB-CIUS]
  - c. 10 Noncategorical SIUs
  - d. 6 Other regulated nonsignificant IUs (Describe) septage haulers
- 23 TOTAL of a. + d.

YES NO

- \* Has the POTW identified any IUs with Pollution Prevention opportunities? *\*Not documented by City 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.): permits

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? [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

<u>(Potential)</u>	<u>PERMIT EXPIRATION</u>
<u>SIU NAME</u>	<u>DATE</u>
<u>City landfill pumps their leachate into a main pump station</u>	
<u>(Recommend permitting)</u>	

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES    NO

- \*  Does the Control Authority accept trucked septage wastes?
- Does the Control Authority accept other trucked wastes?
- \*  Does the Control Authority have a control mechanism for regulating trucked wastes? \*See Attch. A-1 If yes, answer the following:

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):

"Manhole in front of lift station at Stone Dam and will be witnessed by Conway Corp. personnel " although not stated in permit

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?

- |   |  |
|---|--|
| <input type="checkbox"/> Federal Register               | <input checked="" type="checkbox"/> Journals, Newsletters                |
| <input checked="" type="checkbox"/> Meetings, Training  | <input checked="" type="checkbox"/> Other <u>EPA &amp; ADEQ websites</u> |
| <input checked="" type="checkbox"/> Government Agencies | <input checked="" type="checkbox"/> Other <u>internet</u>                |

YES    NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
*Re-evaluation of TBLs currently pending.			

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

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

(Questions about allocation system used. No documentation/basis could be found for several of the below pollutants where local limits have been implemented)

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Proposed (5/02) MAHLs/ 8/13/02 Ord. TBLLs  (lb/day) / (mg/l)
	Yes	No	Yes	No	Yes	No	
	(**In permits)						
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4.52 / 0.5
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	0.13 / 0.015
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	16.45 / 1.0
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.61 / 2.5
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.45 / 1.0
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.27 / 0.69
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.0036 / 0.05
Molybdenum (Mo) *	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	-- / --
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	5.02 / 1.5
Selenium (Se) *	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	-- / 0.4
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.11 / 0.5
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
	n/a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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)			

Limits currently being imposed for three (3) of the pollutants appear to be uniform concentration based.

**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? Tucker creek only receives domestic, but Stone Dam Creek's would apply. The Tupelo Bayou w.w. treatment plant is due for completion in less than 2 yrs which will eliminate the need for Stone Dam and the Tucker Creek POTWs.

**H. COMPLIANCE MONITORING**

Compliance Monitoring and Inspection Requirements:

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

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

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

	<u>Analytical Method *</u>	<u>Name of Laboratory</u>
Metals	<u>ICP/MS</u>	<u>American Interplex</u>
Cyanide	<u>spectrophotometric</u>	<u>"</u>
Organics	<u>GC/MS</u>	<u>"</u>
Other	<u>BOD, TSS, COD</u>	<u>POTW</u>
	<u>Biomonitoring</u>	<u>A.I.</u>

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

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



**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe:  
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)] \*Recently adopted streamlined ordinance does.

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

YES NO

- Describe how the Control Authority will investigate instances of noncompliance?
- Describe the Control Authority's types of escalating enforcement responses and the periods for each response?
- Identify by Title the Official(s) responsible for implementing each type of enforcement response?
- Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

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

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Notice or letter of violation  | <input checked="" type="checkbox"/> Administrative Order    |
| <input checked="" type="checkbox"/> Setting of compliance schedule | <input checked="" type="checkbox"/> Revocation of permit    |
| <input checked="" type="checkbox"/> Injunctive relief              | <input checked="" type="checkbox"/> Fines (maximum amount): |

civil	\$ <u>1000</u> /day/violation
criminal	\$ <u>1000</u> /day/violation
administrative	\$ _____ /day/violation

- Imprisonment
- Termination of Service
- Other: \_\_\_\_\_

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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)]

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	Return to Compliance?	
			Date	Yes (Date) No
None				

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

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

YES NO

Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. \_\_\_\_\_

Has the Control Authority experienced any of the following:

YES NO

EXPLAIN and ID Industrial User

- Interference [WENDB]. \_\_\_\_\_
- Pass through [WENDB]. \_\_\_\_\_
- Fire or explosions? \_\_\_\_\_
- (incl. flash point viol.) \_\_\_\_\_
- Corrosive structural damage? \_\_\_\_\_
- (incl. pH <5.0). \_\_\_\_\_
- Flow obstructions? \_\_\_\_\_
- Excessive flow or pollutant concentrations? \_\_\_\_\_
- Heat problems? \_\_\_\_\_
- Interference due to oil or grease? \_\_\_\_\_
- Toxic fumes? \_\_\_\_\_
- Illicit dumping of hauled wastes? \_\_\_\_\_

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

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

[WENDB-IUPN]

**J. DATA MANAGEMENT/PUBLIC PARTICIPATION**

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

<u>YES</u>	<u>NO</u>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	computerized
<input checked="" type="checkbox"/>	<input type="checkbox"/>	hard copy
<input type="checkbox"/>	<input type="checkbox"/>	OTHER: _____

Are the following files computerized:

Control Mechanism Issuance  
  Inspection and Sampling schedule  
  Monitoring Data  
  IU Compliance Status Tracking (Linko)  
 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?

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

**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

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

<input checked="" type="checkbox"/> POTW general operating fund	50
<input type="checkbox"/> IU permit fees	_____
<input checked="" type="checkbox"/> monitoring charges	50
<input type="checkbox"/> industry surcharges	_____
<input checked="" type="checkbox"/> other (describe) <u>re-sampling</u>	<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:  
Sending out pamphlets on grease problems.  
\_\_\_\_\_  
\_\_\_\_\_
  
4. Does the POTW have any pollution prevention success stories for industrial users documented? no. If yes, please attach.
  
5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?  
no  
\_\_\_\_\_  
\_\_\_\_\_
  
6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No  
If yes, which of the "Guides to Pollution Prevention" were used? n/a  
\_\_\_\_\_  
\_\_\_\_\_

**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: 3496/314992  
Avg. Total Flow (gpd) 370,000 Avg. Process Flow (gpd) 300,000

Industry visited during audit: YES

Comments: \_\_\_\_\_  
\_\_\_\_\_

FILE #: 2 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: 3599/332999  
Avg. Total Flow (gpd) 30,000 Avg. Process Flow (gpd) 8,000

Industry visited during audit: YES

Comments: \_\_\_\_\_  
\_\_\_\_\_

FILE #: 3 Industry Name Valley Plating File/ID No. 23  
Industry Address Highway 65 South  
Industry Description Plating office furniture  
Industrial Category Metal finishing 40 CFR 433  
SIC/NAICS Codes: 3471/332813  
Avg. Total Flow (gpd) 70,000+ Avg. Process Flow (gpd) ~70,000

Industry visited during audit: YES

Comments: Production fluctuates dramatically so actual daily flows are hard to determine  
on any given day.

FILE #: 4 Industry Name Virco #2 File/ID No. 1  
Industry Address 1745 Sturgess Road  
Industry Description Phosphatizing/powder coating of school chairs/tables  
Industrial Category Metal Finishing 40 CFR 433  
SIC/NAICS Codes: 3713/337127  
Avg. Total Flow (gpd) 12,000 Avg. Process Flow (gpd) 3,000  
Industry visited during audit: YES

Comments: \_\_\_\_\_  
\_\_\_\_\_

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

Industry visited during audit:

Comments: \_\_\_\_\_  
\_\_\_\_\_

## SECTION III: INDUSTRIAL USER FILE REVIEW

### A. Industrial User Characterization

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

### B. Control Mechanism

1. Does the file contain an application for a control mechanism? <i>(See Atch. A-3 for example)</i>	1	1	1	1	
If yes, what is the application date?	6/12	6/12	6/12	6/12	
Does it ask for Pollution Prevention information?	no	no	no	no	
2. Does the file contain a Permit?	✓	✓	✓	✓	
Permit Expiration Date?	7/12	7/12	7/12	7/12	
Is a fact sheet included?*	4	4	4	4	
*See Atch. A-5 for example					
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)] <i>(See Atch. A-2 for example)</i>					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	✓	✓	✓	✓	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	2	2	2	2	
e. Appropriate self-monitoring requirements?	3	3	3	3	
f. Sampling frequency?	5	5	5	5	
g. Sampling locations?	✓	✓	✓	✓	
h. Requirement for flow monitoring?	6	6	6	6	
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	

Comments: 1) All applications need certification statement and authorized IU rep's signature with date; 2) See attach. A-2b. Questionable Cd, Cr & Ni limits. The remaining limits are from 40 CFR 433; 3) City does all sampling; 4) Good template but, needs to be more comprehensive in content; 5) City samples CIUs once/month; 6) timed composites (needs to be clarified in permits)

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
Civil and Criminal Penalty provisions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
Revocation of permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
l. Compliance schedules/ progress reports	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
m. General/Specific Prohibitions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
n. Where technologically and economically achievable, are P <sup>2</sup> aspect included?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>      </u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>      </u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>

Comments: 1) Questionable Cd, Cr & Ni "local limits" as to their basis



**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
<b>D. <u>Compliance Monitoring Sampling</u></b>					
1. Does the file contain Control Authority sampling results for the industry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
b. Sample date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
c. Sample type?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
d. Wastewater flow at the time of sampling?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
e. Sample preservation procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
f. Chain-of-custody records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>  1  </u>	<u>  1  </u>	<u>  1  </u>	<u>  1  </u>	<u>      </u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>  timed  </u>	<u>  "  </u>	<u>  "  </u>	<u>  "  </u>	<u>      </u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
<u>Inspections</u> (See Atch. A-4 for example)					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
b. Date of last Inspection	<u>  12/11  </u>	<u>  12/11  </u>	<u>  12/11  </u>	<u>  12/11  </u>	<u>      </u>

Comments: 1) Metal Finishers have not submitted TOMPs so the City is sampling/analyzing for the TTOs in CFR 433 twice/yr.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
9. Does the inspection report(s) include: [403.8(f) (2) (vi)]					
a. Inspector Name(s)	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>      </u>
b. Inspection date and time?	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>      </u>
c. Name and title of IU official contacted?	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>      </u>
d. Verification of production rates?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>      </u>
f. Evaluation of pretreatment facilities?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>      </u>
g. Evaluation of self-monitoring equipment and techniques?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
h. Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u>      </u>
i. Manufacturing facilities?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>      </u>
j. Chemical handling and storage procedures?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>      </u>
k. Chemical spill prevention areas?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>      </u>
l. Hazardous waste storage areas and handling procedures?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>      </u>
m. Sampling procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
n. Laboratory procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
o. Monitoring records?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
p. Evaluation of Pollution Prevention opportunities?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>      </u>

Comments: 1) Form says "see attached description sheet" when there is none. 2) Conway Corp. should have at least one very comprehensive inspection for each permitted facility. The form itself is adequate but, inspections questions were answered in very general terms with boxes checked "yes", "no", "N/A" or "See attached". "Attachments" were not attached; 3) Inspection forms should have the inspector's and the IU rep's signatures on them as well as the date performed written in, not typed; 4) Language should state a slug plan is not necessary per IU's fact sheet, backed-up with their slug potential evaluation form.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

FILE 1    FILE 2    FILE 3    FILE 4    FILE 5

q. Control Authority  
 inspector signature?    See previous page's recommendation #3

IU Self-Monitoring and Reporting

10. Does the file contain self-monitoring reports?    n/a    n/a    n/a    n/a    \_\_\_\_\_

11. Does the file include:  
 a. BMR?    arch.    arch.    ✓    ✓    \_\_\_\_\_

b. 90-Day Report?    "    "    ✓    ✓    \_\_\_\_\_

c. All periodic reports?    n/a    n/a    n/a    n/a    \_\_\_\_\_

d. Compliance schedule reports?    n/a    n/a    n/a    n/a    \_\_\_\_\_

12. Did the IU report on all required parameters?    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    \_\_\_\_\_

14. Did the IU report flow?    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    \_\_\_\_\_

16. For all SIUs, are self-monitoring reports signed and certified?    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    \_\_\_\_\_

18. Has the IU developed a Slug Control and Prevention Plan?    n/n    n/n    n/n    n/n    \_\_\_\_\_

19. Has the industry been responsible for spills or slug loads discharged to the POTW?    no    no    no    no    \_\_\_\_\_

If yes, does the file contain documentation regarding:

a. Did the spill cause Pass Through or Interference?    n/a    n/a    n/a    n/a    \_\_\_\_\_

b. Did POTW respond to the spill?    n/a    n/a    n/a    n/a    \_\_\_\_\_

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
<b>E. Enforcement</b>					
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>None found during previous year</u>				
b. IU self-monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>        </u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>        </u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>        </u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>        </u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>        </u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>        </u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>        </u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>        </u>
8. Did the Control Authority follow its approved ERP?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>        </u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>        </u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>        </u>
11. Were there any compliance schedule violations?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>        </u>

**SECTION III: INDUSTRIAL USER FILE REVIEW**

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

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

Control Authority: Conway Corporation NPDES #: AR0051951

Date of Audit: 6/19 - 21/12 Date entered into QNCR: 7/11/12  
 (ASSESSMENT)

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

**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.

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: Conway Corporation NPDES #: AR0051951

Name, address and phone number of industry:

Virco #2, 1745 Sturgess Road, 501.329.2901

Type of industry: Phosphatizing/powder coating of school chairs/tables; Metal Finishing under 40 CFR 433

Date/Time of visit: 6/20/12 / 8:47 a.m.

Industry contacts: Scott Newell-Env. Mng & Perry Small-Safety & Env. Mngr.

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

#### Additional comments:

Facility has not substantially changed their processes since the audit site visit 6 years ago.

Facility manufactures finishes/assembles mostly school seating (folding chairs mainly).

Raw material include chromed and non-chromed metal tube material from Valley Plating, plastic and various types of fasteners.

They do have an internal "SB-14" plan for environmental improvements. They file a "plan" every 3 years. Facility practices "just in time inventory".

Visit conducted by: Gilliam/Beaty/Lieblong Date: 6/20/12

  
(signature of auditor conducting visit)

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

Control Authority: Conway Corporation NPDES #: AR0051951  
Industry name: Virco #2

Facility operates a "U" shaped basic 5 stage Fe phosphatizing line prior to powder coating.

This consists of a heated caustic wash followed by a fresh water rinse, then a heated Fe phosphatizing stage followed by two fresh city water rinses, then a dry-off oven prior to powder painting (~30 different colors). This entire area is surrounded by a angle iron epoxied to the concrete floor to contain any spills. The caustic wash and phosphatizing tanks are periodically taken off-site for disposal and not discharged to the City because they could not remove enough of the O&G to meet permit limits. After powder painting, chair frames are sent through a bake oven using air curtains saving money in energy.

Rinse tanks are continually overflowed. All make-up water is city water and they do not utilize counterflow practices. Machining (drilling, forming, etc.) and forming (tube, rectangular and square shapes) operations' wastewater is self-contained and hauled off-site for disposal as well as the caustic and phosphatizing tanks' wastewater. The tube forming operation is completely self-contained, coolants drain into a holding sump and are hauled off-site when spent to help eliminate their old O&G problems/permit limit excursions. No pretreatment is necessary to meet CFR 433 limitations.

City Corp. reps were familiar with the facility's operations and the industry rep was familiar with their pretreatment regulations.

Small chemical storage areas were located near the stations the chems were needed. No floor drains were observed nor mentioned. Adequate sampling site although it is underneath the actual phosphatizing line. The sampler would have to crawl underneath the tanks to set up a sampler.

This auditor agrees with the City rep that a slug discharge potential is negligible and a slug discharge plan not necessary.

Visit conducted by: Gilliam/Beaty/Lieblong Date: 6/20/12



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

Date/Time of visit: 6/20/12 / 10:05 a.m.

Industry contacts: David Yarberry-Env. Eng. / Larry Brown-Base  
 Mill Manager

	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?	✓-sampling	___	___
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 3 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 barium stearate powder for surface preparation and lubrication.

Visit conducted by: Gilliam/Beaty/Lieblong Date: 6/20/12

*Allen Dillha*

(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 main or equalization sump. From this sump, wastewater is pumped to 2 stage pH adjustment (~10 s.u.) tanks followed by metal hydroxide precip. with polymers for flocculation, 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. Adequate sampling site.

Visit conducted by: Gilliam/Beaty/Lieblong Date: 6/20/12



(signature of auditor conducting visit)

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

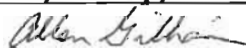
Control Authority: Conway Corporation NPDES #: AR0051951

Name, address and phone number of industry:  
 Steel Fabricated Inc. (SFI), 670 Equity Drive, 501.329.8328  
 Type of industry: Job shop metal finisher for various customer's products (CFR 433)  
 Date/Time of visit: 6/20/12 / 1:20 p.m.  
 Industry contacts: Tom Gerard-H.R./Safety Env. Mngr, Tim Roberts-Maintenance Mngr & Maurice Kilgore-Paint Supervisor

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

Additional Comments: Facility has not substantially changed its core ops since the last Audit site visit 3 years ago, but production is currently down ~40%. By the time of this site visit, there were no ongoing operations. They utilize a typical five stage phosphatizing unit, but galvanized steel is also is also phosphatized and powder coat painted. Other machining ops such as break presses, welding, stamping and machining are conducted in a separate building. Those machining ops' are self-contained and wastewater is hauled off-site for disposal. Raw material includes galvanized (~20%), cold rolled and pickled iron and aluminum, but varies from day-to-day.

Visit conducted by: Gilliam/Beaty/Lieblong Date: 6/20/12



(signature of auditor conducting visit)

# PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Conway Corporation NPDES #: AR0051951

Industry name: SFI

Facility's phosphatizing line includes a heated "soap" degreasing wash ("1A" potassium hydroxide) for the galvanized workpieces, a separate heated Fe phosphatizing stage ("1B") for the carbon steel workpieces followed by a fresh water rinse followed by a final hydrofluorozirconic acid seal/rinse. The workpieces are sent thru a dry-off oven (~325 F) prior to powder coat painting. Countercurrent flow from the fresh water rinse cannot be utilized because of the two different "wash" bath's chemistry. The fresh water rinse tank is completely batch discharged ~twice/month with an employee actually entering the tank to remove any sludges that have built up. All the nozzels and tips in the spray booths are also cleaned at that time. Primary containment is a below grade grated trough that surrounds the entire "phosphatizing" process. After powder coat painting the final products are sent through a cure oven (~425 F) utilizing air curtain to help contain heat in the ovens saving energy. All make-up water is city water. Rinses are continually overflowed to the City.

No pretreatment is necessary except for pH adjustment when necessary. No floor drains were observed nor mentioned and their main chemical storage are consisted of stacked wire caged totes. City Corp. reps were familiar with the facility's operations and the facility rep was familiar with their pretreatment limitations under 40 CFR 433.

Adequate sampling site.

Visit conducted by: Gilliam/Beaty/Lieblong Date: 6/20/12



(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 furniture

Date/Time of visit: 6/20/12 / 2:35 p.m.

Industry contacts: Dennis Fesmire - General Mgr / Mary Robinson -  
Human Resources & Admin. / Wynn Holcomb - Plating Manager

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

\*pH and ORP for internal QA/QC

Additional comments:

Facility has not changed its operations substantially since the last Audit site visit three (3) years ago. Facility manufactures office furniture such as desks, chairs and bookcases. This company took over the old Virco #1 plant/plating operations and has substantially "modernized" their processes and pretreatment. Facility utilizes wetting agents/surfactants in their baths for maximum coverage.

Visit conducted by: Gilliam/Beaty/Lieblong Date: 6/20/12



(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 followed by an air agitated (AA) surfactant cleaning bath; AA water rinse; heated sodium hydroxide electro-clean w/foam block; 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; 4 AA water rinses counterflowed (CF) back to previous tanks; AA and heated Tri-Cr plate bath; AA water rinse; AA water rinse with CF to tank prior to destruction; AA water rinse with CF 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 pumped to a "floc-box", then to a pH adjustment tank with calcium chloride dosed; AA Hex-Cr destruction; then to another pH adjustment tank for typical chemical precip of metals. WW is pumped to another EQ tank from which it flows 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.

Facility uses numerous P2 processes.

City Corp. reps were familiar with the processes and the facility reps were familiar with their pretreatment limitations and very proactive with P2.

Adequate sampling point.

Visit conducted by: Gilliam/Beaty/Lieblong/ Date: 6/20/12



(signature of auditor conducting visit)

*Attachment A1*

**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-89-14, 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, 2012 and ending on June 1, 2013 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: June 1, 2012  
Environmental Coordinator

Attachment A-2

PERMIT #17  
RECEIVED  
7/21/09  
TZ



**Conway**  
Corporation

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-02-117, 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.

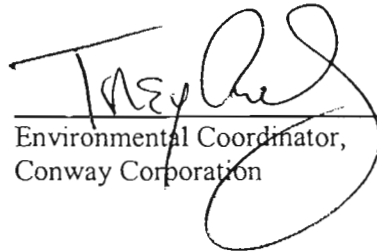
Classified by SIC No. 2296 NACIS No. 314992

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: September 1, 2009

To expire date: July 31, 2012

  
\_\_\_\_\_  
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 <sup>u</sup>	0.015 <sup>u</sup>	E, *3
Chromium	2.770 <sup>u</sup>	1.00 <sup>u</sup>	E, *3
Copper	3.38 <sup>u</sup>	2.07 <sup>u</sup>	E, *3
Cyanide	1.200 <sup>u</sup>	0.650 <sup>u</sup>	E, *2
Lead	0.690 <sup>u</sup>	0.430 <sup>u</sup>	E, *3
Nickel	3.980 <sup>u</sup>	1.50 <sup>u</sup>	E, *3
Silver	0.430 <sup>u</sup>	0.240 <sup>u</sup>	E, *3
Zinc	2.610 <sup>u</sup>	1.480 <sup>u</sup>	E, *3
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 by the City of Conway, Ordinance No. O-02-117, unless they cause the Treatment Plant Head Works to exceed these levels. Exceedances of these parameters are subject to surcharge.

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

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

\*4 Permit limits for Cd, Cr, Ni are based on local limits

*A-26*

**Prohibited Discharges:**

40 CFR 403.5(a)(1) and (b)

(a)(1): General Prohibitions. A User may not introduce into a POTW any pollutants(s) which cause Pass Through or Interference. These General prohibitions and the specific prohibitions in paragraph (b) of this section apply to each User introducing pollutants into a POTW whether or not the User is subject to other National Pretreatment Standards or any National, State, or Local Pretreatment Requirements.

(b) Specific Prohibitions. In addition, the following pollutants shall not be introduced into a POTW:

(1) Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;

(2) Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with a pH lower than 5.0, unless the works is specifically designed to accommodate such discharges;

(3) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;

(4) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW.

(5) Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds 40 degrees Centigrade (104F) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits.

(6) Petroleum Oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

(7) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

(8) Any trucked or hauled pollutants, except at discharge points designated by the POTW.

**Prohibition of bypass.**

(1) Bypass is prohibited, and the Control Authority may take enforcement action against an Industrial User for a bypass, unless;

(i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and

(iii) The Industrial User submitted notices as required under paragraph (c) of this section.

(2) The Control Authority may approve an anticipated bypass, after considering its adverse effects, if the Control Authority determines that it will meet the three conditions listed in paragraph (d)(1) of this section.

A-2c

**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 <sub>5</sub>		-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*

*should be denoted next to BOD, TSS & pH.*

\*-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.

**SAMPLING LOCATION:** Tokusen’s sampling location is at the ISCO sampler against the west wall, next to the control room, behind final pH adjustment tank. Sampling location is also noted on schematic.

**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-02-117)

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-02-117)

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-02-117)

## 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-02-117)

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-02-117. 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 CFR 403.12.). 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

$$S = (\text{Flow})(8.34)((\text{CB}(\text{BOD}-250)) + (\text{CT}(\text{TSS}-250)) + (\text{CO}(\text{OG}-100)))$$

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-02-117).

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-02-117)

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-02-117)

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-02-117)

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-02-117, 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-02-117, 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-02-117, 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-02-117. 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-02-117)

13. Permit Expiration – This permit comes due for review on January 1, 2012. The Permittee must reapply for re-issuance of the permit at least 180 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-02-117)

TOKUSON, H.L.A., INC.  
SIGNATURE: *[Signature]* DATE: 9/25/09  
*Vice-president*

*A-2g*

Attachment A-3



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@tokusenususa.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

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

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

Counterflow rinses in plating process.

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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	<u>24,220</u>	<u>1500</u>	<u>C</u>	<u>WWT</u>
B) Boiler Water	<u>21,798</u>	<u>400</u>	<u>C</u>	<u>Sewer</u>
C) Process Water	<u>288,218</u>	<u>269,000</u>	<u>C</u>	<u>WWT</u>
D) Sanitary Sewer	<u>10,726</u>	<u>10,000</u>	<u>C</u>	<u>Sewer</u>
E) Clean Up Water	<u>700</u>	<u>575</u>	<u>B</u>	<u>WWT/Sewer</u>
F) Other Water	<u>350</u>	<u>350</u>	<u>B</u>	<u>Sewer</u>

#### 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):

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

*A-3c*

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

Y	N	Not		Y	N	Not		Y	N	Not	
e	o	sur		e	o	Sure		e	o	Sure	

A-3d

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1,2,5,6 Dibenzntracene	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Endosulfan Sulfate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PCB-1242
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Indeno Pyrene	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Endrin	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PCB-1254
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Chlordane	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Endrin Aldehyde	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PCB-1221
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4,4 DDT	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Heptachlor	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PCB-1232
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4,4 JDE	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Heptachlor Epoxide	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PCB-1248
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4,4 DDD	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Alpha- BHC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PCB-1260
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Alphaendosulfan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beta-BHC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PCB-1012
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beta endosulfan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Gamma-BHC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Toxaphene
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Beryllium	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Delta-BHC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Antimony
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cadmium	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Copper	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Arsenic
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Chromium	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cyanide	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Asbestos
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lead	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Mercury	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Nickel
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Selenium	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Silver	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Thallium
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Zinc	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2,3,7,8 Tetrachlorodibenzo-p- dioxin	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Xylenes
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Alkyl Eposides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

A-3e

**Conway Corporation's  
Significant Industrial User Inspection Report**

Site Address:	1500 Amity Rd. Conway, AR 72032
Mailing Address:	P.O. Box 1150 Conway, AR 72033
Primary Contact:	David Yarberry
Title:	Environmental Engineer
Telephone:	501-327-6800
Fax:	501-327-5091
Additional Contact:	Jim McNeal
Title:	Engineering Manager
Telephone:	501-327-6800 ext 271
Comments:	

**Process Information**

SIC Code(s):	2296				
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Raw Materials:  
High carbon steel wire rod

Process Description:  
See attached description sheet.

Products:  
Brass plated steel tire cord

**Operations Information**

	1st Shift (12 hr)	2nd Shift (12 hr)	3rd Shift (E shift)
Number Of Employees: (Avg.)	160	120	40
Working Hours:	7 am – 7 pm	7 pm – 7 am	8 am – 5 pm
Hours/Day:	12	12	8
Days/Week:	3 or 4	3 or 4	5

**Water Source & Usage**

Source:	Volume (GPD):	Usage:	Volume (GPD):
City:		Process:	300,000
Other:		Consumed in Product:	0
Total:		Total:	
<i>List all water account number(s):</i>	093000021		
		Process:	300,000

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**Conway Corporation's  
Significant Industrial User Inspection Report**

<i>list wastewater account number(s): If applicable.</i>		Consumed in Product:	0
--	--	----------------------	---

**Process Waste-Streams**

Source Description:	Volume (GPD):	Code Type: *	
Process Water	300,000	CD	
Boiler Water	25,000	CD	
Sanitary Sewage	15,000	CD	
Cooling Water			
CD: Continuous Discharge	OD: Other Disposal (Not sewer.)	BD: Batch Discharge	ND: Not Discharged
<b>* Additional Categorical Waste-Stream Types:</b>			
RCW: Regulated Categorical Waste-Stream		NRCW: Non-Categorical Waste-Stream	
ARCW: Ancillary Regulated Categorical Waste-Stream		DCW: Diluted Categorical Waste-Stream	

*Sketch process waste-stream(s) connections to the City's sewer system or attach copies of drawing(s) to report.*

See Attached.

Production was up last year so slightly more water usage  
 Started to send spent sulfuric acid out as beneficial use  
 Using alfa omega out of texas

A 4c

**Conway Corporation's  
Significant Industrial User Inspection Report**

**Industrial User Permit**

Does the facility have a copy of it's current Industrial User permit on file and available for inspection?  Yes,  No

**General Conditions**

1. Is the Permittee in compliance with all conditions of it's' permit?  Yes,  No  
*If no, list any administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, or summary abatement resulting from noncompliance with the Industrial User's permit.*  
*If yes, skip next question.*

2. If the Permittee is in noncompliance of its' permit, is the Permittee taking all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance including accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge?  Yes,  No  
*If yes, detail the steps taken or if no, explain inaction.*

1. Has the Industrial User's permit been modified for good causes since the permit was granted?  Yes,  No  
*If yes, list causes and modifications.*

2. Has the Industrial User's permit been assigned or transferred to a new owner and/or operator since the permit was issued?  Yes,  No  
*If yes, list new owner and/or operator and give date assigned or transferred.*

3. Has the Permittee increased or decreased the use of potable or process water?  Yes,  No,  
 Not Applicable  
*If yes, explain. Slight decrease b/c course drawing has changed to non contact cooling*  
 Increased water use.       Decreased water use.

**General Permit Standards**

- Is the Industrial User discharging wastewater to the sewer system;
- a) Having a temperature higher than 104 degrees F (40 degrees C),  Yes,  No
  - b) Containing more than 100 PPM by weight of fats, oils, and grease,  Yes,  No
  - c) Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases; or pollutants with a closed cup flash-point of less than one hundred forty (140) degrees Fahrenheit (60 degrees C), or pollutants which cause an exceedance of 10 percent of the Lower Explosive Limit (LEL) at any point within the POTW,  Yes,  No
  - d) Containing any garbage that has not been ground by house hold type or other suitable garbage grinders,  Yes,  No
  - e) Containing any ashes, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or other solids or viscous substances capable of causing obstructions or other interference's with proper operation of the sewer system,  Yes,  No
  - f) Having a pH lower than 5.0 or higher than 12.0, or having any other corrosive property capable of causing damage or hazards to structures, equipment or personnel of the sewer system,  Yes,  No
  - g) Containing toxic or poisonous substances, such as wastes containing cyanide, chromium, cadmium, mercury, copper, and nickel ions, in sufficient quantity to injure or interfere with any wastewater  Yes,  No

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treatment process, to constitute hazards to human or animals, or to create any hazard in waters which receive treated effluent from the sewer system treatment plant,

- h) Containing noxious or malodorous gases or substances capable of creating a public nuisance; including pollutants which may result in the presence of toxic gases, vapors, or fumes;  Yes,  No
- Containing solids of such character and quantity that special and unusual attention is required for their handling,  Yes,  No
- Containing any substance which may affect the treatment plant's effluent and cause violation of the NPDES permit requirements,  Yes,  No
- Containing any substances which would cause the treatment plant to be in noncompliance with sludge use, recycle or disposal criteria pursuant to guidelines of regulations developed under section 405 of the Federal Act, the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act or other regulations or criteria for sludge management and disposal as required by the State,  Yes,  No
- Containing color which is not removed in the treatment process,  Yes,  No
- Containing any medical or infectious wastes,  Yes,  No
- Containing any radioactive wastes or isotopes, or  Yes,  No
- Containing any pollutant, including BOD pollutants, released at a flow rate and/or concentration, which would cause interference with the treatment plant?  Yes,  No

**Pollution Controls**

Does the Industrial User operate a pretreatment plant, equipment, or otherwise pre-treat its' wastewater prior to discharge to the City's sewer system?  Yes,  No

*If yes, list equipment utilized and/or describe treatment process. Attach copies of any available system drawings or schematics.*

*If no, skip section.*

1. Number of pretreatment operators on staff: 5 trained operators

2. Do operators hold State of Arkansas Waste Water Treatment Operator Licenses?  Yes,  No

3. If so, list number of employees having each classification of license:

Class I:                      Class II:                      Class III:                      Class IV:

4. If the facility's pretreatment plant has been evaluated and rated by the State, list the plant's classification (Class I, Class II, Class III, etc.): n/a

**Bypass Of Treatment Facilities**

1. Has the Permittee bypassed treatment facilities?  Yes,  No  
*If yes, detail below.*  Not Applicable  
*If no, or not applicable, skip section.*

2. Is bypass unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist?  Yes,  No

3. Is bypass for essential maintenance to assure efficient operation, which does not cause effluent limitations to be exceeded?  Yes,  No

4. Did the Permittee notify Conway Corporation of any anticipated bypass by written notice, at least ten days before the date of the bypass?  Yes,  No

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5. Did the Permittee immediately notify the Control Authority of any unanticipated bypass and submit a written notice to the POTW within 5 (five) days? No follow up needed  Yes,  No

6. Did written notice of an unanticipated bypass specify;

a) A description of the bypass, and its cause, including its duration,  Yes,  No

b) Whether the bypass has been corrected,  Yes,  No

The steps being taken or to be taken to reduce, eliminate, and prevent a reoccurrence of the bypass?  Yes,  No

**Facility Activity Reduction Requirements**

1. Is the Permittee's treatment facility experiencing any reduction of efficiency of operation, or loss or failure of all or part of the treatment facility? New polymer additions is increasing pretreatment efficiency  Yes,  No  
*If yes, detail below. If no, or not applicable, skip section.*  Not Applicable

2. Is the Permittee attempting to control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided?  Yes,  No

**Removed Substances**

1. Is the Permittee disposing of solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act?  Yes,  No  
*If yes, list wastes, disposal methods, contractor, etc.*  Not Applicable  
*If no, explain. Sludge back to delisted and taken to Two pines landfill*

2. Is the Permittee complying with any additional local and State standards including such standards or requirements that may be come effective during the term of this permit?  Yes,  No  
*If yes, list additional standards. If no, explain.*  Not Applicable

**Process Control Laboratory**

Does the Permittee operate its' own laboratory for pretreatment process controls?  Yes,  No  
*If yes, list parameters analyzed and any additional comments. If no, skip section.*

2. Is the process control laboratory certified by the State of Arkansas?  Yes,  No

3. Are laboratory technician(s) certified in wastewater analysis?  Yes,  No

**Representative Sampling**

Is all equipment used for sampling and analysis routinely calibrated, inspected and maintained to ensure their accuracy and verified by records of maintenance or calibration?  Yes,  No  
*If yes, list equipment used by the Permittee for sampling and/or analysis and any additional comments. Replacement of Water Meter in December will calibrate this at this time*  Not Applicable  
*If no, detail deficiencies.*



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*Not applicable, if no Industrial User sampling and analysis equipment is used.*

2. Has Control Authority been notified and has Control Authority approved the changing of any sampling points?  Yes,  No  
 Not Applicable

**Flow Measurement**

1. Does the Permittee utilize a wastewater flow meter(s) or water meter(s) for flow determination?  Wastewater Flow Meter(s)  
*If wastewater meter, list type(s) used and complete section.*  Water Meter(s)  
*If water meter used, skip section.*

2. Are appropriate flow measurement devices installed, calibrated and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of the type of device being used, including records of verification of maintenance and calibration?  Yes,  No

3. Are devices selected capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes?  Yes,  No

**Monitoring Procedures**

*Not applicable if no discharge and self monitoring requirements suspended; skip section.*  Not Applicable

1. Is the Permittee monitoring outfall(s) for the required parameters?  Yes,  No

Are all parameters being sampled at the designated sampling point(s)?  Yes,  No

3. Are any pollutants monitored more frequently than required by the Industrial User's permit?  Yes,  No

4. If any pollutants were monitored more frequently than required, were test procedures prescribed in 40 CFR Part 136 and amendments thereto, or as otherwise approved by the EPA or as specified in the Industrial User's permit, used?  Yes,  No  
 Not Applicable

5. Is all sampling conducted for the purposes of self monitoring being performed by a certified independent laboratory acceptable to the Control Authority, or has a permit variance been granted to the Industrial User to perform its' own sampling?  Yes,  No

Sampling performed by:  Outside Laboratory  Industrial User  
If independent laboratory or laboratories used, list name(s):

6. Are all laboratory analyses conducted for the purposes of self monitoring being performed by a certified independent laboratory or laboratories acceptable to the Control Authority?  Yes,  No

Name of independent laboratory or laboratories used:

*Review laboratory analysis reports, monthly self monitoring reports, and any chain of custody records or sampling event records*

1. Do records of sampling and analyses include;
- a) The date, exact place, time, and methods of sampling or measurement, and preservation techniques  Yes,  No  
*or procedures,*
  - b) Who performed the sampling or measurements  Yes,  No
  - c) The date(s) analyses were performed,  Yes,  No
  - d) Who performed the analyses,  Yes,  No
  - e) The analytical techniques or methods used,  Yes,  No

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f) *The results of such analyses?*

Yes,  No

- Correct sample types or methods.
- Correct sample frequency.

- Correct handling and preservation techniques. \*
- Correct laboratory analysis methods. \*

\* *In accordance with 40 CFR Part 136 and amendments thereto.*

**Automatic Re-sampling**

1. Did the results of the Permittee's self monitoring wastewater analysis indicate a violation of the Industrial User's permit had occurred?  Yes,  No

*If yes, list each violation separately. If no or not applicable, skip section.*

Not Applicable

*(Not applicable if no discharge and self monitoring requirements suspended.)*

Date of violation:	Notified the City within 24 hours?	Repeated pollutant sampling and analysis?	Submitted re-sample results?	Results submitted within 30 days?
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No

**Accidental Discharge Report**

Did the Permittee have any occurrence of an accidental discharge of substances prohibited by or any slug loads or spills that may enter the public sewer?  Yes,  No  
*If yes, detail below. If no, skip section.*

2. Did the Permittee immediately notify the Control Authority upon the occurrence?  Yes,  No

3. Did the Permittee's notification include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken?  Yes,  No

4. Did the Permittee submit to the Control Authority a detailed written report within seven days following the accidental discharge?  Yes,  No

5. Did the report contain a description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the Permittee's compliance status, including the location of the discharge, type, concentration and volume of the waste?  Yes,  No

6. Did the report contain the duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur?  Yes,  No

7. Did the report contain all steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance?  Yes,  No

**Conway Corporation's  
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**Operating Upset Report**

1. Did the Permittee experience any upset in operations that placed the Permittee in a temporary state of noncompliance with the provisions of either the user's permit?  Yes,  No

*If yes, detail below. If no, skip section.*

2. Did the Permittee inform the Control Authority within 24 hours of becoming aware of the upset?  Yes,  No

3. Did the Permittee file a written follow-up report of the upset to the Control Authority within 5 (five) days? Did the report contain a description of the upset, cause, and impact on compliance?  Yes,  No

4. Did the report contain the duration of noncompliance, including exact dates and times of noncompliance and, if not corrected, the anticipated time the noncompliance is expected to continue, and steps taken to reduce or eliminate future occurrences?  Yes,  No

**Special Monitoring And Reporting Requirements**

1. Does the Permittee have any additional or special monitoring requirements particular to this Industrial User?  Yes,  No

*If yes, attach copy of pertinent page of the industrial user's permit. If no, skip section.*

**Compliance Schedule Requirements**

1. Was the Industrial User under a compliance schedule with the City?  Yes,  No

*If yes, attach copy of the Industrial User's compliance schedule. If no, skip section.*

2. Did the Permittee submit quarterly compliance reports the Pretreatment Office?

1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No

**Records Retention**

1. Is the Permittee retaining records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by user's permit, and records of all data used to complete the application for permit, for a period of at least three years from the date of the sample, measurement, report or application?  Yes,  No
2. Are all records that pertain to matters that are the subject of special orders or any other enforcement action or litigation activities brought by the Control Authority being retained and preserved by the Permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired?  Yes,  No  
 Not Applicable

**Planned Facility Changes**

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1. Has the Permittee had any facility expansion, production increase, or process modifications, which results in new or substantially increased discharges or a change in the nature of the discharge? Looking at sending sulfuric acid away as spent waste and looking at doing away with water spray on final dye that would eliminate 30k-50k a year  Yes,  No  
 Not Applicable
- If not applicable, skip next question.*
2. Did the Permittee give notice to the Control Authority 90 days prior to the above planned changes?  Yes,  No  
 Not Applicable
3. Has the Permittee given advance notice to the Control Authority of any planned changes in the permitted facility or activity, which may result in noncompliance with the Industrial User's permit requirements?  Yes,  No  
 Not Applicable

**Signatory Requirements**

1. Do all applications, reports, or information submitted to the Control Authority contain the appropriate signature as required in the Wastewater Contribution Permit, Part 3, paragraph F.  Yes,  No

**Cost Recoveries And Penalties**

1. Has the Permittee been liable and billed for costs incurred for any cleaning, repair, or replacement work caused by any violation or discharge that caused any expense, loss, or damage to or otherwise inhibited the Control Authority wastewater disposal system?  Yes,  No  
 Not Applicable

**Facility Site Inspection**

**Spill Prevention**

1. Does the facility have a spill prevention plan?  Yes,  No  
*If no, skip next question.*
2. Is a copy of the spill prevention plan on file with the Control Authority?  Yes,  No

**Slug Control**

1. Were the Industrial User's slug control and prevention measures evaluated?  Yes,  No
2. Are adequate precautions being taken and proper procedures followed to prevent accidental spills and slug loads?  Yes,  No

**Chemical and Hazardous Waste Storage**

Chemical Type Or Product Name:	Maximum Amount Stored:	Proximity To Floor Drains: (In feet.)
See previous inspection.		

**Pollution Controls**

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1. Is the Permittee at all times properly operating and maintaining all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with it's permit?  Yes,  No  
 Not Applicable

*Not applicable if no pretreatment equipment, skip section.*

2. Does the Permittee's proper operation and maintenance include;
- a) Effective performance;  Yes,  No
  - b) Adequate funding;  Yes,  No
  - c) Adequate operator staffing and training;  Yes,  No
  - d) Adequate laboratory and process controls?  Yes,  No n/a

3. Does the Permittee have proper records of operation and maintenance of pretreatment equipment?  Yes,  No

**Manufacturing Facilities**

1. Were manufacturing or production facilities inspected?  Yes,  No  
 Not Applicable
- Not applicable if no manufacturing or production facilities.*

**Pretreatment Facilities**

- Were pretreatment facilities inspected?  Yes,  No  
 Not Applicable
- Not applicable if no pretreatment equipment.*

**Entry And Inspection**

- Has the Permittee allowed the Control Authority or an authorized representative upon the presentation of credentials and other documents as may be required by law to;
- a) Enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of user's permit,  Yes,  No
  - b) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under user's permit,  Yes,  No
  - d) Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and  Yes,  No
  - e) Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under user's permit, could originate, be stored, or be discharged to the sewer system?  Yes,  No

Attachment A-5

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						

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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



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4/29/09  
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## TOKUSEN PROCESS DESCRIPTION

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.

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### **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 H<sub>2</sub>SO<sub>4</sub> 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.

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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 FeCl <sub>2</sub> 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 <sub>4</sub> 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 <sub>2</sub> SO <sub>4</sub> Electroclean [4 units]	Non-contact steam heated bath. Wire contact with H <sub>2</sub> SO <sub>4</sub> . 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 <sub>2</sub> SO <sub>4</sub> 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.

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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

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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

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<b>WWTP Equipment Descriptions and Operating Ranges</b> <b>Tokusen USA, Inc.,</b> <b>Conway, Arkansas</b>		
<b>Solids Removal Tanks</b>	<b>Process Description</b>	<b>Operation Range</b>
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
<b>Final Pre-Treatment Tanks</b>	<b>Process Description</b>	<b>Operation Range</b>
18. T-106 Final pH Adjustment Tank	Mixing tank for second stage chemical treatment.	8,000 gallon fiberglass tank
<b>Dewatering Equipment</b>	<b>Process Description</b>	<b>Operating Range</b>
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

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**Compliance Monitoring Information**

Compliance Activity Type: Inspection/Evaluation \* Compliance Monitoring Type: AFO Defined  
 \* State: AR AFO Designation  
 Compliance Monitoring Activity Name: Conway Pretreatment Program Aerial Photography  
 If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method: (Allen Gilliam) Audit (IU)

**Linked Facility**

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	AR0051951	C-AR0033359 & AR0047279		

**Compliance Monitoring Dates**

Planned Start Date: 6/19/12 Actual Start Date: 6/19/12  
 Planned End Date: 6/21/12 Actual End Date: 6/21/12

**Statutes and Sections Information**

Federal Statutes: CWA - Clean Water Act

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

State Statute:

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

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

Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist? No  
 Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? State  
 If Joint, what was the purpose of the participation of the other party?  
 Which party had the lead?

**Government Contacts**

Affiliation Type	First Name	Last Name	Phone	Office	Organization
SIC Codes:	Codes				
NAICS Codes:	Codes				
				OECA National Priority:	2009 - (CA Only) - Air Toxics - Flares 2009 - (CA Only) - Air Toxics - LDAR 2009 - (CA Only) - Air Toxics - Surface Coating 2009 - (CA Only) - Financial Assurance 2009 - (CA Only) - MP - Mining
				Regional Priority:	2009 - Region 06 - Air Toxics Major Sources (O & G) 2009 - Region 06 - Brine Spills from Oil & Gas Operations 2009 - Region 06 - CD Implementation 2009 - Region 06 - Minor Wastewater Collection & Treatment System 2009 - Region 06 - Petroleum Refining

**Media Monitored**

Media Monitored: Compliance Monitoring Media Indicator

Multimedia Indicator:

**Compliance Monitoring Information**

Number of Days Physically Conducting Activity: 3  
 Number of Hours Physically Conducting Activity: 21  
 Compliance Monitoring Action Outcome: Satisfactory  
 Compliance Monitoring Rating Code:

**Compliance Monitoring Comments**

Compliance Monitoring Comments:



Special Programs

Pretreatment

Significant Industrial Users (SIUs)

SIUs :

SIUs Without Control Mechanism :

SIUs Not Inspected :

SIUs Not Sampled :

SIUs in SNC with Pretreatment Standards :

SIUs in SNC with Reporting Requirements :

SIUs in SNC with Pretreatment Schedule :

SIUs in SNC Published in Newspaper :

SIUs on Schedules :

Violation Notices issued to SIUs :

Administrative Orders issued to SIUs :

Civil Suits Filed Against SIUs :

Criminal Suits Filed Against SIUs :

Local Limits

Date of Most Recent Technical Evaluation for Local Limits :

Date of Most Recent Adoption of Technically Based Local Limits :

Local Limit Pollutants :

POLLUTANTS

Removal Credits

Removal Credits Application Status :

Date of Most Recent Removal Credits Approval :

Removal Credits :

POLLUTANTS

Categorical Industrial Users (CIUs)

CIUs :

CIUs in SNC :

Acceptance of Waste

Acceptance of Hazardous Waste :

Acceptance of Non-Hazardous Industrial Waste :

Acceptance of Hauled Domestic Wastes :

Penalties

Dollar Amount of Penalties Collected : \$

Industrial Users (IUs) from which Penalties have been collected :

Deficiencies

Deficiencies Identified During IU File Review :

Control Mechanism Deficiencies :

Legal Authority Deficiencies :

Deficiencies in Data Management and Public Participation :

Deficiencies in Interpretation and Application of Pretreatment Standards :

Inadequacy of Sampling and Inspections :

Adequacy of Pretreatment Resources :

Other information

SUO Reference :

SUO Date :

Annual Pretreatment Budget : \$

Pass-Through/Interference Indicator :

Violation of IU Schedule for Remedial Measures :

Formal Response to Violation of IU Schedule for Remedial Measures :

Annual Frequency

Annual Frequency of Influent Toxicant Sampling :

Annual Frequency of Effluent Toxicant Sampling :

Annual Frequency of Sludge Toxicant Sampling :

<< PREVIOUS SAVE & EXIT SAVE & CONTINUE SAVE & ADD ANOTHER COPY & CREATE NEW CANCEL