

ADEQ

ARKANSAS
Department of Environmental Quality

December 20, 2012

Reggie Corbitt, P.E., C.E.O.
Little Rock Wastewater Utility
11 Clearwater Drive
Little Rock, Arkansas 72204

Re: City of Little Rock (NPDES #AR0021806; AR0040177; AR0050849) Pretreatment Program Audit / Municipal Pollution Prevention (P2) Assessment

Dear Mr. Corbitt:

Please find enclosed the finished report for the audit/assessment conducted November 13th through the 15th, 2012. The contents should be made available for review by appropriate City officials. A review should be made of the required action and recommendations. Please respond in writing within thirty (30) days your corrective action for the only perceived deficiency perceived during the audit

This auditor was impressed with the professionalism and cooperation exhibited by your personnel during the audit and industry site visits. This State auditor commends them for their work ethic, performance and pride of ownership of the City's Pretreatment and Pollution Prevention Programs.

Two of EPA's focal points being integrated with the National Pretreatment Program are: Pollution Prevention (P2) and partnerships between the regulators and those regulated in achieving the objectives of the Clean Water Act. It is obvious this has been a successful work in progress by LRW Pretreatment personnel.

It was a pleasure working with your staff during the audit and becoming more familiar with Little Rock, its industries and your Pretreatment Program and Pollution Prevention practices.

Sincerely,



Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist, Attachments A and EPA's example fact sheet template

cc: Craig Uyeda/Enforcement Branch Manager
Field Services Branch Manager
Rudy Molina/EPA 6WQ-PP

**PRETREATMENT PROGRAM AUDIT /
POLLUTION PREVENTION ASSESSMENT FOR
THE CITY OF LITTLE ROCK, ARKANSAS
NPDES TRACKING PERMIT #AR0021806**

December 20, 2012

PREPARED BY:

Allen Gilliam

ADEQ State Pretreatment Coordinator

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- C) Recommended POTW Actions for Improved Implementation or Enforcement of the Pretreatment and Pollution Prevention Programs
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LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

- Section I: General Information
- Section II: Program Analysis and Profile
- Section III: Industrial User File Review
- Reportable Noncompliance (RNC) Worksheet
- SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation and EPA's Guidance Fact Sheet

A) INTRODUCTION

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

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

An audit/assessment was performed November 13 – 15, 2012, of the Pretreatment Program implemented by the City of Little Rock, Arkansas. Participants included:

Allen Gilliam	ADEQ / State Pretreatment Coordinator
Jeff Davis	City / Pretreatment Supervisor
Tony Roll	City / Industrial Inspector
Cornelius Jones	City/ Industrial Inspector
Allen Gatlin	City / Industrial Inspector
Mike Murders	City / Sampling Supervisor

The goals of the audit/assessment were:

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

Little Rock's Pretreatment Program was originally approved 11/1/82. A modification was approved in September of 1987 which revised their old pretreatment ordinance to include maximum headworks concentrations and included the maximum penalty amount.

Program modifications were submitted, approved and incorporated into the city's two (2) NPDES permits on 4/6/99. These modifications included a headworks loading re-evaluation with "Guideline

Local Limits", an Enforcement Response Plan, revised Sewer Use Ordinance, Program narrative changes and included as a separate "working document", a Pretreatment Procedures Manual.

Final approval of the City's Streamlining modifications to meet the minimum requirements of the revised Federal Pretreatment Regulations in 40 CFR 403 was given on 4/1/08. This non-substantial modification notice and date were inserted into the City's NPDES permits.

The Department received a certification statement from Oswald Engineering (dated 9/4/12) on behalf of Little Rock Wastewater stating, "...the existing TBLs are based on current water quality standards and are adequate to prevent pass through of pollutants, inhibition of, or interference with the treatment facilities and prevent the contamination of biosolids..."

The City's two (2) largest wastewater treatment plants both consist of screening, grit removal, primary clarifiers, activated sludge, secondary clarification. Adams Field uses UV while Fourche Creek uses chlorination/de-chlorination as disinfection before discharge to the Arkansas River.

The Adams Field POTW has a design flow of 36 MGD with an average flow of about 27 MGD. There are 18 SIUs (6 categorical) contributing approximately 5.7% of that average flow. Its sludge slurry is pumped to the Fourche Creek POTW for final treatment before land application by as EQ sludge.

The Fourche Creek POTW has a design flow of 16 MGD with an average flow of about 9.5 MGD. Approximately 8.1% of that is from 18 SIUs, 8 of which are categorical. About 5,400 dry tons of EQ sludge (~57% from the Adams Field POTW) was land applied during 2012.

The City's newest POTW, Little Maumelle has a design flow of 4 MGD with an average flow of about 2.4 MGD. This POTW only receives domestic and light commercial wastewater. Its processes include screening, grit removal, activated sludge, clarification, tertiary drum filters and odor control. It was built covered with the buildings being brick to blend in with the surrounding neighborhood. Its sludge will be pumped to the Adams Field POTW for transfer to the Fourche Creek POTW.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to five (5) of their industrial users, one of them, a "non-discharging" categorical. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as 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 the City of Little Rock. 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

1) Under **40 CFR 403.5(b)** “Specific prohibitions. In addition, the following pollutants shall not be introduced into a POTW: **(8)** Any trucked or hauled pollutants, except at discharge points designated by the POTW.”

During the file review, LRW’s “Guidelines for Liquid Waste Disposal at the AFTP Disposal Station” (Attch. A-3) a specific discharge point could not be located, only the “Adams Field Disposal Station”. If this “Station” is adequately directed to and identified by signage, this “deficiency” may be disregarded.

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

1) Recommend updating the City’s “Technically Based Local Limits Development Document” (last revision submitted on 11/17/98) to reflect the current conditions such as the addition of the Little Maumelle POTW and UV disinfection at Adams Field for example.

The industry make-up in that document is outdated as well.

2) Recommend tailoring IU surveys to fit industry/business sectors. A survey with questions to machine shops would obviously not apply to screen printers or dentist offices.

3) Recommend developing a separate (from the permits’) fact sheet per SIU. This should be kept up-to-date with revision dates noted on the document. Attached is EPA’s latest guidance on fact sheets for your review and possible use. The actual start-up/first discharge date should also be noted.

4) Consider removing the priority pollutant scan (PPS) from the reporting requirements for the Little Rock landfill’s leachate. Most parameters historically showed non-detect. In lieu of the entire PPS being required to report for, surrogate parameters could be substituted that may indicate some change has occurred in the landfill’s leachate. The City could then require the entire PPS to be sampled and analyzed again to see what pollutants might have increased to cause the surrogate’s sudden change.

5) Recommend permitting all liquid waste haulers. Include the general and specific prohibitions in 40 CFR 403.5(a)(1) and (b) as well as the statement of applicable civil and criminal penalties per 40 CFR 403.8(f)(1)(B)(5).

6) Recommend including information on the LRW’s website regarding proper disposal of pharmaceuticals. The State’s Drug Director’s website could also be included to help Little Rock residents find their nearest “take-back” sites at <http://www.artakeback.org/>.

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

There are no evident Program modifications this auditor could ascertain being needed to the City's Pretreatment Program.

* * * * *

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

PRETREATMENT AUDIT CHECKLIST (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information Pages 1- 8
 Section II: Pretreatment Program Analysis Pages 9-18
 Section III: Industrial User File Evaluation Pages 19-25

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: Little Rock Wastewater NPDES Tracking #: AR0021806
 Mailing address: 11 Clearwater Dr., L.R. 72204

Permit Signatory(s): Stan Miller; Eric Wassell & Walter Collings
 Titles: Treatment Plant Superintendents

Telephone: 501.376.2903 FAX NUMBER: 376.3541 or 688.1463

Pretreatment Contact: Jeff Davis Title: Pretreatment Supervisor
 Address: 11 Clearwater Drive
 Telephone: 501.688.1495
 e-mail jeff.davis@lrwu.com

Pretreatment program approval date: 11/1/82

Dates of approval of any substantial modifications: 9/1/87, 4/6/99 & 4/1/08

Month Annual Pretreatment Report Due: March

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 11/13 - 15/12
 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>* Jeff Davis</u>	<u>Pretreatment Supervisor</u>	<u>688.1547</u>
<u>Allen Gatlin</u>	<u>Industrial Inspector</u>	<u>688.1494</u>
<u>Cornelius Jones</u>	<u>Industrial Inspector</u>	<u>688.1492</u>
<u>Tony Roll</u>	<u>Industrial Inspector</u>	<u>688.1493</u>

*Pretreatment contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>5/12</u>	<u>No deficiencies indicated</u>
<u>PCI</u>	<u>4/10</u>	<u>No deficiencies indicated</u>

YES NO

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

If yes, describe the required corrective action: _____

Is the Control Authority currently in SNC or RNC?

.....

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

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
*AR0021806	Adams Field	8/1/12	7/31/17
AR0040177	Fourche Creek	5/1/08	4/30/13
AR0050849	Little Maumelle	6/1/08	5/31/13

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Adams Field
 Location Address: 1001 Temple, East of Little Rock National Airport
 Expiration Date of NPDES Permit: 7/31/17
 Treatment Plant Wastewater Flow: Design- 36 MGD; Actual (Avg.)- 27 MGD
 Sewer System: 100 %; # of SSOs due to grease blockages 10

Industrial Contribution to this Treatment Plant

of SIUs: 18 # of CIUs: 6
 Industrial Flow (mgd): 1.54 Industrial Flow(%): 5.7 % (based on last ['11] annual report)

Level of Treatment

Type of Process(es):

Primary screening; grit removal; primary clarifiers; equalization
 Secondary basin; mixed activated sludge; secondary clarification
 Tertiary and sludge thickening

Method of Disinfection: UV

Dechlorination: YES NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3C AR River Basin

Receiving Stream Use: primary/secondary contact recreation; raw water source for domestic and industrial; 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:

<input type="checkbox"/> * Land Application	<input type="checkbox"/> dry 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.

*sludge slurry is piped over to their Fourche Creek POTW for ultimate land app.

List of toxic pollutant limits in NPDES permit: Conventionals, TRC & WET testing

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for
Adams Field 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 (EQ sludge)

Issuance Date: "

Expiration Date: "

List pollutants that are specified in current sludge permit:

n/a

YES NO N/A

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

✓

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (e.g. Is there an ongoing TRE?) No lethality nor sub-lethality exhibited on either species over the last 3 yrs (7 tests)

 ✓

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>4</u>	<u>4</u>	<u> </u>	<u> </u>
Priority **	<u>1</u>	<u>1</u>	<u> </u>	<u> </u>
Biomonitoring	<u> </u>	<u>2</u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u> </u>	<u> </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.

Annual report graphs might indicate some pollutant loadings have decreased since the mid '90s (CN, Cd, Cu, Ag and As for example)

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 for sludge over the last 12 months?

 ✓

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

Parameters Violated

Cause(s)

None

YES NO

Has the treatment plant sludge violated the TCLP Test?

 ✓

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Fourche Creek
Location Address: 9500 Birdwood Road, L.R. 72206

Expiration Date of NPDES Permit: 4/30/13

Treatment Plant Wastewater Flow: Design- 16 MGD; Actual (Avg.)- 9.53 MGD

Sewer System: 100 % # of SSOs due to grease blockages 5

Industrial Contribution to this Treatment Plant

of SIUs: 18 # of CIUs: 8

Industrial Flow (mgd): 0.7 Industrial Flow (%): 8.1 %

Level of Treatment

Type of Process(es):

Primary Screening; grit removal; primary clarifiers;

Secondary activated sludge and secondary clarification

Tertiary _____

Method of Disinfection: Chlorination

Dechlorination: YES NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Seg. 3C AR River Basin

Receiving Stream Use: primary/secondary contact recreation; raw water source for domestic and industrial; 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:

<input checked="" type="checkbox"/> Land Application	<u>5400</u> dry tons/yr. in '12; 4200 in '11
<input type="checkbox"/> Incineration	_____ dry tons/yr.
<input type="checkbox"/> Monofill	_____ dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	_____ dry tons/yr.
<input type="checkbox"/> Public Distribution	_____ dry tons/yr.
<input type="checkbox"/> Lagoon Storage	_____ dry tons/yr.
<input type="checkbox"/> Other (specify)	_____ dry tons/yr.

*It's estimated 57% of applied sludge is from the Adams Field POTW.

List of toxic pollutant limits in NPDES permit: conventionals, TRC & WET testing

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Little Maumelle

Location Address: ~3,300 feet north of Chenal Parkway and State Highway 10

Expiration Date of NPDES Permit: 5/31/13

Treatment Plant Wastewater Flow: Design- 4 MGD; Actual (Avg)- 2.42 MGD

Sewer System: 100 %; # of SSOs due to grease blockages: 2

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 Screening; grit removal; activated sludge;

Secondary clarification and tertiary drum filters

Tertiary _____

Method of Disinfection: UV

Dechlorination: YES NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Seg. 3C AR River Basin

Receiving Stream Use: primary/secondary contact recreation; raw water source for domestic and industrial; 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

_____ dry tons/yr.

_____ Incineration

_____ dry tons/yr.

_____ Monofill

_____ dry tons/yr.

_____ Mun. Solid Waste Landfill

_____ dry tons/yr.

_____ Public Distribution

_____ dry tons/yr.

_____ Lagoon Storage

_____ dry tons/yr.

* _____ Other (specify)

_____ dry tons/yr.

* Permit indicates this POTW's sludge will be transported by pipeline to the Adams Field WWTP.

List of toxic pollutant limits in NPDES permit: conventionals, NH3-N & acute WET testing

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for
Little Maumelle 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:
 n/a

YES NO N/A

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

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (e.g. Is there an ongoing TRE?) No lethality nor sub-lethality exhibited on either species over the last 3 yrs (4 tests)

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> 2 </u>	<u> 2 </u>	<u> </u>	<u> </u>
Priority **	<u> 1 </u>	<u> 1 </u>	<u> </u>	<u> </u>
Biomonitoring (acute)	<u> </u>	<u> 2 </u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Other:	<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.

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 for 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>pH violations (10/31/11)</u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </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.
Modification to the City Pretreatment Ordinance and their Pretreatment Program were made to be current with the Streamlining Mods to CFR 403.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permits
4/1/08	Modifications were made to adopt and implement the required Streamlining revisions to CFR 403 Ordinance No. 19,895	4/1/08
A non-substantial mod was made on 7/20/12 to remove the surcharge section		

2. Modifications in Progress:

Date Requested	Nature of Modification
N/A	

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

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

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

Date of original Pretreatment Program approval: 11/1/82 [WENDB-PTIM]
 Date of most recent Ordinance approved by the Control authority: 12/21/07
 Date of most recent Pretreatment Program modification approval: 4/1/08

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

YES NO

- Deny or condition pollutant discharges
- Require compliance with standards
- Control discharges through permit or similar means
- Require compliance schedules and IU reports
- Carry out inspection and monitoring activities
- Obtain remedies for noncompliance
- Comply with confidentiality requirements
- Establish Pollution Prevention
- Has the city developed and adopted a Pollution Prevention policy?

YES NO

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: 3 landfills (leachate) but, only 1 brought in any leachate since 2009)
- Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?
- Have provisions been made for the incorporation of Pollution Prevention (P²) policies by contributing jurisdictions?

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

<u>Name of Jurisdiction</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1. <u>Cammack Village (city of)</u>	<u>0</u>	<u>0</u>	<u>Contract</u>
2. <u>Alexander (city of)</u>	<u>0</u>	<u>0</u>	<u>"</u>
3. <u>College Station (unincorporated)</u>	<u>0</u>	<u>0</u>	<u>"</u>

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

	<u>Problems</u>
<input type="checkbox"/> Updating industrial waste survey	<u>None</u>
<input type="checkbox"/> Notification of IUs	<u>"</u>
<input type="checkbox"/> Permit issuance	<u>"</u>
<input type="checkbox"/> Receipt and review of IU reports	<u>"</u>
<input type="checkbox"/> Inspection and sampling of IUs	<u>"</u>
<input type="checkbox"/> Assessment of IUs for P ² activity	<u>"</u>
<input type="checkbox"/> Analysis of samples	<u>"</u>
<input type="checkbox"/> Enforcement	<u>"</u>
<input type="checkbox"/> Other: _____	<u>_____</u>

Briefly describe other problems: None

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

<u>IU Name</u>	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</u>
_____	_____	_____	_____

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

YES NO

- Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *Sent initial screening form in '06. See Attachment A-1 for screening form and list of IUs/businesses sent form in 2011 & 2012 and full master list of IUs/businesses sent screening form.*
- If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P2 activities? **Only on second, more extensive survey form as deemed necessary after initial screening form.*
- 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 P2 activities and the distribution of P2 reference materials to the IUs which qualify? **Inspection and survey forms include P2 assessments/questions. 2nd round of surveys are similar to their permit applications which include P2 questions.*

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) ADEQ's haz. waste list & Central Arkansas Mfg. Direct.

How often is the survey to be updated? Ongoing

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

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?
<u>Access Marketing</u>	<u>CFR 414 OCPSF categorical</u>	<u>✓ (no discharge)</u>
<u>Ace Powder Coating</u>	<u>CFR 433 Metal Finisher (job shop)</u>	<u>✓ (no discharge)</u>

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

- a. 36 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 14 Categorical Industrial Users (CIUS) [WENDB-CIUS]
- c. 22 Noncategorical SIUs
- d. 19 Other regulated nonsignificant IUs (Describe) See '11 annual report
- 55 TOTAL of a. + d.

YES NO

- Has the POTW identified any IUs with Pollution Prevention opportunities?
- Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(i-ii)]

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

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

- Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application? **See Attachment A-2 for example application and P2 question on A-2k (cover letter to a different company than the one that filled out the application. All apps. are in the same template form)*

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

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

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

IU NAME	PERMIT EXPIRATION DATE

- 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? *Guidelines only. See Attachment A-3 for example "guideline" and manifest. If yes, answer the following:

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

Pollutant	Limit
See Attachment A-3 for example guidelines and manifest for liquid waste disposal.	

Describe the discharge point(s) (including security procedures):
"At disposal station manhole witnessed by city operator" (exact disposal site not specifically specified in the above guideline).

- YES NO
 Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes? *Not at present but they have in the past.
 Does the Control Authority have a control mechanism for regulating wastes from UST sites? *Not exactly a control mechanism, but a written "policy"

List all pollutants and applicable limits, other than local limits and categorical standards, that are applied to UST cleanup sites:

Pollutant	Limit
See Attachment A-4 for draft "Policy" and pollutant limitations.	

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?

2012 Date Notified Letter* Method of Notification
 *There's also language in the IU surveys.

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

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

- 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
N/A			

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		+Local Limits Adopted?		"Guideline" +Monthly Avg. Numerical Limit (mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.14
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.2
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	5.0
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	5.0
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.8
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.3
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.002
Molybdenum (Mo) *	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	--
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4.9
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.1
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2.0
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4.8

* - If necessary for the sludge disposal option chosen.
 + - Narrative Ord. Language references the "TBL Document"

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"/>	<input type="checkbox"/>	

YES NO

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

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

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

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? City chose the most stringent between the two large POTWs and applied them to both POTWs. The newest POTW, Little Maumelle is strictly domestic and light commercial.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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/yr</u>	1/year	_____
Other SIUs	<u>"</u>	1/year	_____
Sampling:			
CIUs	<u>1/yr</u>	1/year	_____
Other SIUs	<u>2/yr</u>	1/year	<u>City does these</u>
Reporting:			
CIUs	<u>monthly</u>	2/year	<u>The CIUs have more of a potential</u>
Other SIUs	<u>city does it</u>	2/year	<u>to impact the POTW</u>
Self-Monitoring:			
CIUs	<u>monthly to 2/yr</u>	2/year	_____
Other SIUs	<u>city does it</u>	2/year	_____

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

<u>#</u>	<u>%</u>	<u>How many and what percentage of SIUs were:</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.

Does the Control Authority routinely split samples with industrial personnel: *Splits are conducted/provided upon request.*

YES NO
 If requested?
 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>AA flame & furnace</u>	<u>City/A.A./A.I</u>
Cyanide	<u>spectrophotometric</u>	<u>City</u>
Organics	<u>GC/MS</u>	<u>American Analytical</u>
Other	<u>T.Phenols 420.1</u>	<u>City</u>

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

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

YES NO

 Does the POTW use QA/QC for sampling and analysis? If yes, describe:
They scrutinize the IU's field reports for details, use clean sampling protocol, and rely on ADEQ's and EPA's blanks

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

<2 wks Conventionals
<1 mos Metals
<1 mos Organics

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

- * If no, does the Control Authority conduct all of the monitoring?
*See above
- 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		Return to Compliance?	
		Type	Date	Yes (Date)	No

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	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:

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? _____

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

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount
Civil	0	\$
Administrative	4	\$ 2,430
Total	4	\$ 2,430 [WENDB-IUPN]

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

<input checked="" type="checkbox"/>	<input type="checkbox"/>	computerized
<input checked="" type="checkbox"/>	<input type="checkbox"/>	hard copy *Hard copy documents could be filed better organized in this auditor's opinion.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	OTHER: <u>Linko software (proprietary)</u>

Are the following files computerized:

Control Mechanism Issuance
 Inspection and Sampling schedule (exact day is not specified)
 Monitoring Data
 IU Compliance Status Tracking (Excel spreadsheet)
 Other: elements of their FOG program, invoicing, septage haulers

Can IU monitoring data can be retrieved by:

Industry name
 Pollutant type
 Industrial category or type
 SIC Code
 IU discharge volume (process if IU has a separate sewer meter)
 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?
Information designated "confidential" by an IU is kept in a locked office. If it's FOI'd, staff would turn the request over to their legal counsel. (Griffen and Accessories Marketing have requested)

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

If yes, please explain: _____

Are all records maintained for at least 3 years?

K. RESOURCES

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

Six sampling & inspection personnel + 2 lab techs (no change from last audit) equaling ~ 5 FTEs.

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

	<u>Percent of Total Funding</u>
<input checked="" type="checkbox"/> POTW general fund (G.F.)	<u>100</u>
<input checked="" type="checkbox"/> IU permit fees (*goes back to the G.F.)	_____
<input type="checkbox"/> monitoring charges	_____
<input checked="" type="checkbox"/> industry surcharges	_____
<input type="checkbox"/> other (describe) _____	_____
Total	100%

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Is funding expected to continue near the current level? If no, will it:
 Increase or Decrease
 If no, describe the nature of the changes:
Yearly operation and maintenance increases will occur

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

		<u>If no, explain</u>
<input checked="" type="checkbox"/>	Legal assistance	_____
<input checked="" type="checkbox"/>	Permitting	_____
<input checked="" type="checkbox"/>	IU inspections	_____
<input checked="" type="checkbox"/>	Sample collection	_____
<input checked="" type="checkbox"/>	Sample analyses	_____
<input checked="" type="checkbox"/>	Data analysis, review and response	_____
<input checked="" type="checkbox"/>	Enforcement	_____
<input checked="" type="checkbox"/>	Administration (inc. record keeping /data management)	_____

Does the Control Authority have access to adequate:

YES	NO		<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	<u>Isco automatic samplers; pH meters</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	<u>Respirators, safety belts, shoes, glasses, etc.</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	<u>2 stepvans, 3 trucks</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	<u>AA flame & furnace, spectrophotometer, LRW and contract lab instruments</u>

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.):
IU's activities currently being implemented are requested as part of the permit application process. IU's P2 activities are also focused on during the inspections at their SIUs. LRW is now focusing on a FOG program and private systems' cleaning.
2. Has the source of any toxic pollutants been identified?
 If yes, what was found?
None.
3. Has the POTW implemented any kind of public education program? If yes, describe:
They have tours for school kids often. They are still active in the City's "Zoo Days" w/environmental awareness information. LRW's website has a hotlink to "Stay Connected" which is helpful to the public regarding the sewer system.
4. Does the POTW have any pollution prevention success stories for industrial users documented? Yes. If yes, please attach. The city has not been compiling them.
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?
 If yes, which of the "Guides to Pollution Prevention" were used? All SIUs were given their applicable P2 guidance in the past. The city is now focused on the printing sector and their "fountain solutions".

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name: Porocel File/ID No. S-83
Industry Address: 10300 Arch Street Pike
Industry Description: Mfg of oil processing catalyts and absorbents
Industrial Category: n/a 40 CFR n/a SIC/NAICS Codes: 2819/?????
Avg. Total Flow (gpd) 1,700 Avg. Process Flow (gpd) 1,700

Industry visited during audit: YES

Comments: Elemental Hg is used in its lab to determine porosimetry in one its lab tests.

FILE #: 2 Industry Name: Sage V File/ID No. S-98
Industry Address: 5901 Sloane Drive
Industry Description: Rice processing
Industrial Category: n/a 40 CFR n/a SIC/NAICS Codes: 2038,2044/311212
Avg. Total Flow (gpd) ~234,000 Avg. Process Flow (gpd) 216,000

Industry visited during audit: YES

Comments: Rice cooking, drying freezing and packing

FILE #: 3 Industry Name: Ace Powder Coating File/ID No. C-06
Industry Address: 8200 Frazier Pike
Industry Description: Phosphatizes and powder coats metal parts for individual customers (job shop)
Industrial Category Metal Finishing 40 CFR 433 SIC/NAICS Codes: 3317/33281
Avg. Total Flow (gpd) <500 Avg. Process Flow (gpd) zero discharge

Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name: Welspan File/ID No. C-95
Industry Address: 9301 Frazier Pike
Industry Description: Mfg. large diameter; phosphatizes and coats exterior
Industrial Category: Metal Finishing 40 CFR 433 SIC/NAICS Codes: 3317/331210
Avg. Total Flow (gpd) 75,000 Avg. Process Flow (gpd) 16,500

Industry visited during audit: YES

Comments:

FILE #: 5 Industry Name: Little Rock Landfill File/ID No. S-47
Industry Address: 10803 Ironton Cutoff
Industry Description: Residential landfill's leachate directly tied to the City
Industrial Category: N/A 40 CFR N/A SIC/NAICS Codes: 2099/5622
Avg. Total Flow (gpd) ~16,500 Avg. Process Flow (gpd) ~14,700

Industry visited during audit: YES

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?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Is the user subject to categorical pretreatment standards?	<u>no</u>	<u>no</u>	<u>✓</u>	<u>✓</u>	<u>no</u>
a. New source or existing source (NS or ES)?	<u>n/a</u>	<u>n/a</u>	<u>NS</u>	<u>NS</u>	<u>n/a</u>
b. Is this IU one identified as having P ² potential?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>

B. Control Mechanism

1. Does the file contain an application for a control mechanism? (See Attch. A-5 for example)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
If yes, what is the application date?	<u>5/11</u>	<u>5/11</u>	<u>9/12</u>	<u>4/12</u>	<u>3/12</u>
Does it ask for Pollution Prevention information?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Does the file contain a Permit? (See Attch. A-6 example)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Permit Expiration Date?	<u>6/13</u>	<u>8/13</u>	<u>10/14</u>	<u>5/14</u>	<u>3/14</u>
Is a fact sheet included?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Appropriate discharge limitations?	<u>1</u>	<u>1</u>	<u>2</u>	<u>✓</u>	<u>1</u>
e. Appropriate self-monitoring requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
g. Sampling locations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) Local limits; 2) No discharge of regulated process wastewater

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>
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>
1. Compliance schedules/ progress reports	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
m. General/Specific Prohibitions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</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>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</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>n/a</u>
4. For IUs subject to production- based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
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>n/a</u>
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
D. <u>Compliance Monitoring</u>					
<u>Sampling</u>					
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>

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>
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>1</u>	<u>1</u>	<u>n/a</u>	<u>✓</u>	<u>1</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>n/a</u>	<u>n/a</u>	<u>2</u>	<u>3</u>	<u>n/a</u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>✓</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 Attch. A-7 for example summary)					
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>6/12</u>	<u>7/12</u>	<u>10/12</u>	<u>5/12</u>	<u>3/12</u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</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>n/a</u>

Comments: 1) City uses IU's flowmeter. If there's not one, the City uses water consumption meter; 2) No discharge metal finisher; 3) TTO monitoring

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>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Evaluation of pretreatment facilities?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
i. Manufacturing facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>n/a</u>
j. Chemical handling and storage procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>n/a</u>
k. Chemical spill prevention areas?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>n/a</u>
l. Hazardous waste storage areas and handling procedures?	<u>1</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
m. Sampling procedures?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>n/a</u>
n. Laboratory procedures?	<u>Contract Labs--> "</u>			<u>"</u>	<u>"</u>
o. Monitoring records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
p. Evaluation of Pollution Prevention opportunities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
q. Control Authority inspector signature?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

IU Self-Monitoring and Reporting

10. Does the file contain self-monitoring reports?	<u>n/a</u>	<u>n/a</u>	<u>1</u>	<u>✓</u>	<u>n/a</u>
11. Does the file include:					
a. BMR?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>n/a</u>
b. 90-Day Report?	<u>n/a</u>	<u>n/a</u>	<u>1</u>	<u>✓</u>	<u>n/a</u>
c. All periodic reports?	<u>n/a</u>	<u>n/a</u>	<u>1</u>	<u>✓</u>	<u>n/a</u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
12. Did the IU report on all required parameters?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>
14. Did the IU report flow?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>

Comments: 1) No discharging metal finisher

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>
15. Did the IU comply with the required reporting frequency(s)?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>n/a</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>n/a</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>✓</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
b. Did POTW respond to the spill?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
b. IU self-monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>15</u>	<u>0</u>	<u>0</u>	<u>0</u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n.n</u>	<u>✓</u>	<u>n.n</u>	<u>n.n.</u>	<u>n.n.</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>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>
11. Were there any compliance schedule violations?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
During such 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>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>
Date of publication.	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Little Rock NPDES #: AR0021806

Date of Audit: 11/13 - 15/12 Date entered into QNCR/ICIS: 12/20/12
(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
NO	Other violations of concern	II

SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806
 Name, address and phone number of industry:
Ace Powder Coating, 5207 Scott Hamilton 501.565.3600

Type of industry: Job Shop Metal Finisher Date/Time of visit:
40 CFR 433 *(no discharge) 11/14/12 / 8:50 a.m.

Industry contacts: Phillip Webb/Manager

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

+facility needs to find a better way to capture its sand blasting mtrl and properly dispose of it.

Additional comments:

This facility is a small job shop metal finisher who takes in different customers' metal parts, sand blasts them clean, steam phosphatizes (5%) them and then powder coat paints them to the customers' specs. Facility rep said he learned that if the phosphate was left on the parts longer than 90 seconds it starts to "grow" (oxidizing) leaving what looked like sandpaper. They've corrected this problem using a high pressure steam "rinse" before 90 seconds. There is no wastewater generated since almost 100% of the phosphatizing spray and "rinse" evaporates. There are no floor drains in the facility.

This site visit was to confirm the facility is a true "no discharge" categorical.

Visit conducted by: Gilliam/Davis/Jones/Roll

Date: 11/14/12



(signature of auditor conducting visit)

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

Control Authority: Little Rock NPDES #: AR0021806
Industry name: City of LR Landfill

Additional Comments:

The facility's fueling station is covered and has 3 above ground fuel storage tanks. The covered area under the fueling trucks is sloped to 3 individual drains that connect to a sand/oil interceptor. "Treated" water is sent to the storm water ditch. The compost pad is a large (20- 25 acre) concreted pad used for storing and curing compost the landfill produces from yard waste. Storm water from the pad is channeled (sloped) to a holding pond on the north side of the compost area. Some water from this pond is re-circulated back to the compost piles. Excess holding pond water is discharged to a storm water ditch that is NPDES permitted.

The main wastewater discharge is from the landfill's leachate collection system. Each (6) landfill cell has 2 pump stations that pump the leachate to an aerated/lined basin. The aerators are computer controlled and the number of aerators in use at any time is determined by the flow into the basin. The leachate from the aeration basin passes through an old weir and monitoring station where it is discharged to the City's sewage collection system.

Visit conducted by: Gilliam/Davis/Jones/Roll

Date: 11/14/12



(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
 Porocel, 10300 Arch Street Pike, 501.888.1357
 Type of industry: Mfg. of absorbents/catalysts/desiccants from
 metallic and non-metallic minerals
 Date/Time of visit: 11/14/12 / 10:00 a.m.
 Industry contacts: Kenny Doyle, Quality System & Env. Coord.

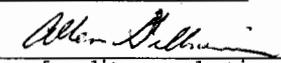
	Yes	No	N/A
1. Significant industrial user?	✓	—	—
2. Classified correctly?	✓	—	—
3. Pretreatment equipment or procedures?	✓*	—	—
4. Pretreatment equipment maintained and operational?	—	—	n/a
5. Hazardous waste generated or stored?	✓	—	—
6. Proper solid waste disposal?	✓	—	—
7. Solvent management/TTO control?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

*basic solids settling

Additional comments:

Facility has several processes in the manufacture of absorbents and catalysts. Most raw material is brought in by truck, but some by rail. The facility's complexity of pipes, "elevators", conveyors and ductwork precluded a very detailed description of each process. Chemicals are stored throughout the facility in areas where the chems are used in a particular process. They're contained in large totes or tanks surrounded by 4' berms to prevent spills from going beyond the immediate area. There are no floor drains near these chemical storage areas. Chemicals listed as being stored include: acetic and nitric acid, caustic soda, lime, cupric oxide, potassium nitrate, sodium hydrosulfide, zinc oxide, arsenic, nickel and hex-chrome (dry flakes). Most of the processes were dry with dust collected in baghouses. The primary source of wastewater is from their "Tri-mer" NO_x air scrubber system. It uses water from the R/O system to prevent the discharge of NO_x to the environment. The discharge of NO_x to the air is primarily caused from the use of nitric acid in metal refining and chemical nitration. Dry processes include a kiln process where course bauxite is pre-crushed and pre-screened before being direct fired in a rotary kiln. The calcined ore is fed to a screen where the product is put into a super sack for shipment.

Visit conducted by: Gilliam/Davis/Jones/Roll
 Date: 11/14/12


 (signature of auditor conducting visit)

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

Control Authority: Little Rock NPDES #: AR0021806
Industry name: Porocel

Additional Comments: Emissions from this process is controlled by a complex aspiration system exhausted through a baghouse.

Another dry process feeds alumina based material into a kiln via a variable frequency drive belt conveyor. After that material is calcined to the right specs it is also screened with the larger screen sized product is crushed and screened for final product. Again, emissions are controlled via a baghouse.

Their "extrusion line process" (base powder not known) comes in by railcar and super sacks and held in two bins. The material is conveyed from the bins to a receiver tank on the 3rd floor in the shaping and forming building. The base powders and liquids (unknown) are mixed and sent to the former on the 2nd floor. The material is formed onto a small belt and gravity fed into a feed hopper on the 1st floor for heat treatment at 250-300^oF. The material will then be fed into calciner #3 to customer specs. The exhaust emissions from the clean air side of the baghouse are discharged into the Tri-Mer NO_x scrubber. The extrudates are discharged out of calciner #3 into a cooling tube then screened. Fines from the cooling tube are collected and bagged in super sacks. The screened material is packaged into super sacks.

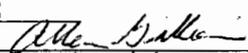
Two other dry processes are mentioned in the facility's processes: "Regrind/Blend Phase I & Regrind/Blend Phase II" (w/calciner [burns off molecular water in the hydrate] to convert aluminum trihydrate to aluminum oxide) and the "Activated Alumina Plant" (w/calciner feed tanks to convert the aluminum hydrate to aluminum oxide). Here the Al oxide is stored in a bin. The calcined powder is conveyed into 3 inclined/rotating tubs where water or a "promoter" is combined. The tubs form the powder into spheres of varying sizes, discharged down a chute onto a covered curing belt (180^oF) then into super sacks. The spheres are fed into the "activators" at temps typically up to 850^oF to remove any moisture. A process included in the Alumina plant is impregnation and toll calcining which involves mixing of the catalyst carrier materials with (not described) liquid solutions of varying compositions and concentrations. The feed material may consist of powders, granules, spheres, or extrudates into a closed "Munson" mixer, similar to a washing system with the spheres caught in a super sack. Any moisture in this system is steamed off.

As mentioned earlier process wastewater is from the "Tri-Mer" NO_x scrubber blowdown, R/O and water softener. This facility does not appear to fall under any of the Subparts in the Inorganic Chemicals category in 40 CFR 415.

The porosimetry tests using Hg has been securely isolated with all precautions taken to ensure no Hg will enter the City's collection system. Previously, this lab's waste was sent to the septic tank which did discharge to the City's collection system. Adequate sampling point and caused a "hit" at the City's POTW.

Visit conducted by: Gilliam/Davis/Jones/Roll

Date: 11/14/12


(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
 Sage V Foods, 5901 Sloan Drive, 501.492.3722
 Type of industry: Producing rice based products
 Time of visit: 11/14/12 / 12:55 p.m.
 Industry contacts: Buddy Curtis, Maintenance

	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 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Pollution Prevention activity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional comments:

Facility produces rice based ingredients for use in processed foods. The facility's line of frozen rice is also sold to the food service and retail markets. Rice is delivered by truck and conveyed to silos in the production area. Rice is blanched, boiled and either dried or frozen and sent to customers. The three carbon towers and water softener tank supply the boiler system with treated water. Ammonia is used for the freezing process. The ammonia and cooling tower storage room has all of its floor drains capped. The chemicals for the cooling tower are kept on secondary containment basins. Any oils or lubes used in their processes have to be food grade.

Visit conducted by: Gilliam/Davis/Roll/Jones

Date: 11/14/12



 (signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Little Rock NPDES #: AR0021806

Industry name: Sage V Foods

Additional comments:

The City is accepting the facility's full strength BOD for use in its POTW's digester to generate more gas for its electric co-gen process.

The facility's pretreatment system is pH adjustment using sodium hydroxide which is in totes kept on secondary containment basins. Process wastewater is pumped through 4 screen shaker separators to remove solids before discharge through the wastewater flume/sampling point. A pH meter tests the w.w. and sodium hydroxide is added as needed.

The separators remove solids from the w.w. and is conveyed to a waste bin disposal mostly to pig farmers.

Cleaning w.w. enters a storage tank and is pumped through the cleaning w.w. flume (outfall #2).

Visit conducted by: Gilliam/Davis/Roll/Jones

Date: 11/14/12



(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806
Name, address and phone number of industry:
Welspun, 9301 Frazier Pike Road, 501.301.8828
Type of industry: Mfg. spiral/coated pipe Date/Time of visit:
40 CFR 433 11/14/12 / 1:50 p.m.
Industry contacts: Wesley Crouch, Env. Engineer

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

*pH adjustment

Additional comments:

The facility was not in operation at the time of this site visit due to falling demand and the main contact was not available for a more detailed description of the various operations. Facility brings in cold rolled carbon steel in exacting thickness for customer specs. The coils are unrolled and sent through a "flattening" set of rollers to produce a semi-flat sheet of steel. The flat "sheets" of steel are spiral wound together in a huge machine that curls the steel sheet together in a spiral fashion to form the large diameter pipe immediately after which welding is done to seal the seams together. The operations at this facility do not "fit" any of the subprocesses under the Iron and Steel category in 40 CFR 420. Other operations in the spiral mill included pinch leveling and rolling, edge milling, edge bending, cleaning (no water), seam welding, hydro-testing, X-ray and final inspection. The X-ray wet film processing unit has a silver recovery unit, but discharges to the sanitary waste line. The facility has had no problems meeting the Metal Finishing limitations (including the TTOs) in 40 CFR 433.

Visit conducted by: Gilliam/Davis/Gatlin/Jones

Date: 11/14/12


(signature of auditor conducting visit)

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

Control Authority: Little Rock NPDES #: AR0021806
Industry name: Welspun

Additional comments:

The facility's coating mill is separate from the spiral mill building. It consists of a cleaning station where the pipe (outside) is washed with phosphoric acid to clean the pipe of any salt deposits and prepare the surface for coating. After the phosphatizing it is rinsed with R/O water to remove any excess acid. This w.w. is sent to the "pretreatment" pit.

The pipe is heated and the dry powder epoxy is sprayed on the surface. Due to the heat the powder immediately turns into a liquid state and is then cooled. After the epoxy coating is hardened, it is sent through a waterfall tunnel to further cure the epoxy. Water from the waterfall is re-circulated through the cooling towers.

The facility also has a high pressure stripping operation for pipe rejects, but is infrequently used. After heating the pipe a high pressure water jet is used to remove the epoxy coating. Wastewater from this operation is cleaned by a series of screens, centrifugation and a set of micro filters and then sent to the cooling tower. Any solids captured in this "cleaning" operation is sent to a Class 1 landfill.

"Pretreatment" consists of pH adjustment with caustic soda. Cooling tower blowdown is discharged as a special discharge and is sampled through a permitted outfall.

Visit conducted by: Gilliam/Davis/Gatlin/Jones

Date: 11/14/12



(signature of auditor conducting visit)



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Environmental Assessment Division

Adams Field Treatment Plant
1001 Temple Street
Little Rock, Arkansas 72202
Fax.: 501/688-1540

Wastewater Screening Form

City of Little Rock Pretreatment Ordinance #19,895 requires that all industrial/commercial dischargers to the Little Rock Wastewater sanitary sewer meet specific requirements regarding quality and quantity of their discharged wastewater. These requirements are mandated by the U.S. Environmental Protection Agency under the Federal Clean Water Act. In order to assess compliance with the applicable city, state and federal requirements, Little Rock Wastewater is collecting information from all "non-domestic" dischargers on the system. This Wastewater Screening Form is the first step in this process. **Please complete both sides of this form and return it to the above address within 30 days of receipt.** If you have any questions, please call Little Rock Wastewater Environmental Assessment Division at 688-1541.

Part I – Industry Information

Business Name: _____

Business Location: _____

Business Mailing Address: _____

Contact Person Name: _____

Title: _____

Telephone Number: _____

Business Hours _____ Business Days: Mon. Tues. Wed. Thurs. Fri. Sat. Sun.

Number of Employees: _____

Water Works Account Number(s):
(Include all Active Account Number(s)) _____

Part II – Wastewater Characteristics

Type of Business: _____

Process(s) Performed: _____

Products Manufactured: _____

SIC Code: _____ NAICS Code: _____

Please check all sources of wastewater discharged from you facility to the sanitary sewer.

Type of Wastewater	Estimate Percent of Total Discharge	Type of Wastewater	Estimate Percent of Total Discharge
Bathrooms/Domestic		Laundry	
Kitchen/Restaurant		Metal Working	
Floor Cleaning		Plating Baths	
Tank Wastes		Equipment Cleaning	
HVAC/Boiler Discharges		Pretreatment System	
Vehicle Maintenance Wash		Machine Coolants	
Waste Product Disposal		Other Non-domestic Sources	

2012 IU Survey

Industry Name	Industry Type / Manufacturer	Address	Sources	Contact Number	Status	ADEQ Hazardous Waste generator	Evaluation	Discharge
Horton & Horton Printing	Digital & Offset Printing	12412 Sardis Rd.	J	501-455-3168	Closed	No	Minimum Concern	Domestic
Novus	Animal Feed Supplements	7920 Sloane Dr.	H	501-492-2209	Closed	No	Minimum Concern	Domestic
AD Craft	Digital & Screen Printing	1122 W. 3rd St.	J	501-372-5231	Closed	No	Minimum Concern	Domestic
3DI / UAMS	Radiopharmaceuticals Products	4301 W. Markham	K	501-686-5536	Closed		Survey Completed	Domestic
Essic Air	Plastic Forming	5800 Murray St.	B,D	501-562-1094	Closed		Survey Completed	Domestic
Water Treatment		145 Cornerstone Rd	F		Closed	No	Minimum Concern	Domestic
Thyssenkrupp Elevator		211 Cornerstone Rd	F		Closed	No	Minimum Concern	Domestic
TAS Environmental		180 Cornerstone Rd	F		Closed	No	Minimum Concern	Domestic
Short Trax		200 Cornerstone Rd	F		Closed	No	Minimum Concern	Domestic
Celestica		7600 Interstate 30	D			No	Returned to Sender	
All American Care of Little Rock		2600 John Barrow Rd	D	224-4173		No		
LM Glassfiber		7901 Lindsey Rd	D		Received	Yes	Minimum Concern	
Hisco		8200 Distribution Dr	L		Received	Yes	Returned to Sender	
Oxford Screen Printing Inc.							Inspected	
Windsor Republic Doors	Garage Door Manufacture	5800 Scott Hamilton Dr.	L		Received	Yes	Survey Completed	Pending
New York Air Brake		315 Industrial Dr.	L			Yes	Facility closed	none
Golden Eagle of Arkansas	Beverage Distributor	1900 E. 15th St.	A		Pending	No	Survey Completed	Pending
Comet One Hour Cleaners	Dry Cleaner	11121 Rodney Parham Rd	L	666-4882	Closed	Yes	Survey Completed	Domestic
Comet One Hour Cleaners	Dry Cleaner	14309 Cantrell Rd	L	666-4882	Closed	Yes	Survey Completed	Domestic
Standard Aero	Aircraft Maintenance	3223 E. 10th St.	L	375-1650	Closed	Yes	Survey Completed	Domestic
Artcrest Inc.		2003 S. Louisiana	L			Yes		
Ace Sign Co.		5512 Patterson Rd.	L			Yes	Returned to sender	
Multi-States Electric Company								
Parker Solvent Company								
Shinns Cleaners		2800 Foxcroft	L		Received	Yes	Minimum Concern	
Schickels Cleaners	Dry Cleaner	5724 Dreher Lane	L	225-7807	Received	Yes	Survey Complete	Domestic
Schickels Cleaners	Dry Cleaner	11609 Cantrell Rd.	L	225-7807	Received	Yes	Survey Complete	Domestic
360 Flimworks		223 East Markham St. Sur	A			No		
AFCO Steel		1500 East 22nd St.	L		Received	Yes		
AFCO Steel		1423 East 6th St.	A		Received	No	Minimum Concern	
Allegra Paint & Imaging	Print Shop	5610 West 65th St.	A		Inspected	No	Survey Completed	Spent fountain Solution
Audio Recording Corp. of Arkansas		309 North Roanoke	F			No		
Bray Sheet Metal Company	Sheet Metal Shop	1508 Scott St.	A		Received	No	Survey Completed	Domestic
Camera Works Inc.	Photo Developer	718 S. Gain St.	A		Received	No	Survey Completed	Domestic
Carlton-Bates Company						No		
DNT Media		210 S. Gain St.	A		Received	No	Minimum Concern	
G.C. Evans Sales and Manufacturing		3300 S. Woodrow St.	A		Received	No	Minimum Concern	
Film & Company LLC		1205 Jennifer Dr.	A		Received	No	Minimum Concern	
FTS Inc.		3100 Jones St.	F			No		
Geo Specialty Chemicals Inc.	Mining	9213 Arch St. pike	A	888-1211	Received	No	Survey Completed	None
Global Skypport Media Groups		#1 Shackelford	A			No		
Harcros Chemicals		3100 W. 65th St.	A		Received	No	Minimum Concern	
Jones Productions						No		
LcB Nail Lacquer Blinn						No		
Little Rock Filter Service		3114 Scott Hamilton Dr.	L			No		

AIC

Mr. Plastic		3117 Joshua St.	A	Received	No	Minimum Concern	
Royal Family of Companies		10625 Otter Creek East	B		No		
National Custom Metal Doors	Door Manufacture	1701 East 22nd St.	B	Received	Yes	Survey Completed	Domestic
Gesco Inc.	Refurbish Drums	3085 Shiloh		Received	No	To be Inspected	
Arkansas Democrat Gazette	Print Paper	1000 E. 20th St.		Hand Delivered	Yes	To be Inspected	

- Green = No Reply
- Orange = Survey Inspection pending
- Purple = Received, Minimum to no threat to discharge pollutants of concern
- Lime = Returned to sender
- Survey Completed
- Permit Pending

Sources

- A = 2012 Business Guide
 - B = Surveyed Industries in Linko
 - C = 2011 Business license
 - D = CAW over 730ccf
 - E = Phone Book
 - F = Drive By
 - G = Newspaper
 - H = Construction Plans
 - J = Call in, Anonymous reports, IU contact
 - K = Inspection
 - L = ADEQ Hazardous Waste Generators
- * Minimum of concern - pretreat or recirculate wastewater (zero discharge), adequate chemical storage no drains.

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2011 IU Survey

Industry Name	Industry Type / Manufacturer	Address	City	Sources	Status	ADEQ Hazardous Waste generator	Evaluation	Discharge
Plastic Industries	Manufacture of Plastic Life	1700 East 9th St	Little Rock	B	Closed		Minimum Concern	Domestic
Marriage Craft Club	Handcraft and Handmade Artwork							
Color Munch								
Magnetics								
Emerald								
Novus								
Deluxe								
Any Life								
Valiant								
Partners								
Art								
House of Music								
Inside								
Bad Kids								
Q&A								
Tutor Time								
Pacific								
Har								
Indust								
The								
werspun	Pipe Manufacture	9301 Frazier Pike Road	Little Rock	G	Permit Pending	yes	Catergocial	40 CFR 433
Accessories Marketing	Slime Manufacture	7511 Scott Hamilton	Little Rock	H	Permit Pending	yes	Catergocial	40 CFR 414

A-1e

No Reply = Green
 Orange = Pending
 Yellow = Received, Minimum to no threat to discharge pollutants of concern
 Survey Completed
 Permit Pending

Sources

- A = 2011 Business Guide * Minimum of concern - pretreat or recirculate wastewater (zero discharge),
- B = Surveyed Industries in Lir adequate chemical storage no drains.
- C = 2010 Business license
- D = CAW over 730ccf
- E = Phone Book
- F = Drive By
- G = Newspaper
- H = Construction Plans

Little Rock Wastewater
 Industrial Pretreatment Program
 Industry List Summary

Filter Criteria:
 All Permits AND
 Industry No DOES Contain ...x...

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A-14

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X - 4551234	Franklin Electric	X - 455123	12401 Interstate 30		Little Rock	Yes	Srvy-		
X-2177426	The Watkins Company		11601 Otter Creek Roa		Little Rock	Yes	Srvy-		
X-2198258	Discount Imaging		11521 Kanis Road		Little Rock	Yes	Srvy-		
X-2199992	SpeasTech Inc.		1527 Bowman Rd.	Suite F	Little Rock	Yes	Srvy-		
X-2210004	Mel Collazo DDS		11811 Hinson Road	Suite 100	Little Rock	Yes	Srvy-		
X-2210361	PCC, Inc.		5 Woodbury Court		Little Rock	Yes	Srvy-		
X-2212266	West Little Rock Foot Clinic		10020 West Markham		Little Rock	Yes	Srvy-		
X-2212565	Environmental Services Co.		13715 W. Markham		Little Rock	Yes	Srvy-		
X-2215830	Little Rock Diagnostic Clini		10001 Lile Drive		Little Rock	Yes	Srvy-		
X-2217242	Michael Pohlkamp DDS		11815 Mara Lynn #6		Little Rock	Yes	Srvy-		
X-2219986	Publishing Concepts		14109 Taylor Loop Rd.		Little Rock	Yes	Srvy-		
X-2230822	Kitchens Pediatric Dentistry		10310 W Markham		Little Rock	Yes	Srvy-		
X-2232393	ASAP-Advertising Specialti		13200 W. Markham	Ste. 102	Little Rock	Yes	Srvy-		
X-2232773	Dale Fallis DDS PA		10500 W Markham #10		Little Rock	Yes	Srvy-		
X-2233034	West Little Rock Glass		1903 Hinson Loop		Little Rock	No	Srvy-		
X-2233322	Pinnacle Point Behavior Hel	X-2233322	11501 Financial Center		Little Rock	Yes	Srvy-	08-30-2010	
X-2234410	Richards Promotional Produ		2105 Stoney Creek Dr.		Little Rock	No	Srvy-		
X-2238539	Outdoor Management		6807 Shamrock Dr.	PO Box 25201	Little Rock	Yes	Srvy-		
X-2238663	Familylife Ministry Campus		5800 Ranch Drive		Little Rock	Yes	Srvy-		
X-2240227	Sign Express dba Archway		1202 Business Dr.		Little Rock	Yes	Srvy-		
X-2241299	Wendell C Thompson DDS		10025 W Markham	Suite 250	Little Rock	Yes	Srvy-		
X-2242020	Bedford Camera & Video	X-2242020	11400 North Rodney Pa		Little Rock	No	Srvy-		
X-2242333	Samuel M Strong DDS		1415 Breckenridge Driv #D		Little Rock	Yes	Srvy-		
X-2244977	Kwal Paint		9301 Treasure Hill Roa		Little Rock	Yes	Srvy-		

Little Rock Wastewater
 Industrial Pretreatment Program
 Industry List Summary

Filter Criteria:
 All Permits AND
 Industry No DOES Contain ...x...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-2245060	American Interplex Corporat		8600 Kanis Rd.		Little Rock	Yes	Srvy-		
X-2245220	Barg-Gray Clinic		9600 Lile Drive	Doctors PK bldg	Little Rock	Yes	Srvy-		
X-2245437	Arkansas Health Group		904 Autumn Road	Suite 100	Little Rock	Yes	Srvy-		
X-2245500	Cornerstone Clinic for Wom		1 Lile Court	Suite 200	Little Rock	Yes	Srvy-		
X-2246333	Gary N Rollins DDS		9601 Lile Drive #950		Little Rock	Yes	Srvy-		
X-2246727	Benny J. Green MD		14309 Cantrell Road	Suite 7	Little Rock	Yes	Srvy-		
X-2246969	Green Mountain Animal Hos		11601 Rodney Parham		Little Rock	Yes	Srvy-		
X-2247536	L Frederick Church Jr DDS		10310 W Markham #30		Little Rock	Yes	Srvy-		
X-2250040	Comet Cleaners	X-2250040	14309 Cantrell Rd.		Little Rock	Yes	Srvy-		
X-2252444	Bellevue Animal Clinic		7824 Cantrell Road		Little Rock	Yes	Srvy-		
X-2252868	Cantrell Animal Clinic		7703 T Street		Little Rock	Yes	Srvy-		
X-2254138	Rodney Parham Animal Clin		9501 N Rodney Parham	Suite 9	Little Rock	Yes	Srvy-		
X-2254470	George E Gillian DDS		9700 W Markham		Little Rock	Yes	Srvy-		
X-2256645	Allegra Print and Imaging		11225 Interstate 30		Little Rock	Yes	Srvy-		
X-2257711	Pathology Laboratories of A		1 Lile Court Ste 101		Little Rock	Yes	Srvy-		
X-2258520	George B Morledge III DDS		5 Office Park Drive	Suite 104	Little Rock	Yes	Srvy-		
X-2259222	Breckenridge Family Practic		10121 Rodney Parham	Suite 2	Little Rock	Yes	Srvy-		
X-2270112	Jeffrey K Garner DDS		10809 Executive Center	Searcy Building, S	Little Rock	Yes	Srvy-		
X-2270234	Southern Photo Center	X-2270234	315 N. Bowman		Little Rock	Yes			
X-2275000	RiverCity Printing & Imagin	X-2275000	11511 Huron Ln		Little Rock	Yes	Srvy-		
X-2275200	Paul Burton DDS		8116 Cantrell Road		Little Rock	Yes	Srvy-		
X-2275240	Radiology Consultants of Lit		9601 Lile Drive	Suite 1100, Med.	Little Rock	Yes	Srvy-		
X-2275567	Fallon A Davis DDS		10319 W Markham		Little Rock	Yes	Srvy-		
X-2276200	Leif Lorenz DDS		10319 W Markham Stre		Little Rock	Yes	Srvy-		

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Little Rock Wastewater
 Industrial Pretreatment Program
 Industry List Summary

Filter Criteria:
 All Permits AND
 Industry No DOES Contain ...x...

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Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-2276363	Autumn Road Family Practi		904 Autumn Road #200		Little Rock	Yes	Srvy-		
X-2276441	Laser Fill		12416 Pleasant Forrest		Little Rock	No			
X-2276453	Paula Martin Fletcher DDS		1415 Breckenridge Driv Ste. B		Little Rock	Yes	Srvy-		
X-2277668	Central Arkansas Endodonti		13239 Cantrell Road		Little Rock	Yes	Srvy-		
X-2277770	ICI Paints		13315 Chenal Pkwy.		Little Rock	Yes	Srvy-		
X-2277900	Briarwood Animal Hospital		8422 Kanis Road		Little Rock	Yes	Srvy-		
X-2278104	Rose Publishing Co., Inc.		2723 Foxcroft Road #2		Little Rock	Yes	Srvy-		
X-2279588	T. James Bush Jr DDS		1215 Breckenridge Driv		Little Rock	Yes	Srvy-		
X-2286360	N.C. Andrews DDS		14309 Cantrell Rd	Suite 6	Little Rock	Yes	Srvy-		
X-2580911	Resource Recovery Inc. Go	X-2580911	801 S. Chester St		Little Rock	No			
X-2809777	All Natural Stone		2225 Cottondale Lane		Little Rock	Yes	Srvy-		
X-3018500	Boyd Metals of Little Rock		4324 Mauney Rd.		Little Rock	Yes	Srvy-		
X-3406311	AFCO Steel	X-3406311	1423 East 6th St.		Little Rock	No			
X-3710022	Little Rock Chiropractic Cli		1100 W 3rd Street		Little Rock	Yes	Srvy-		
X-3720228	Berg & Sons		1201 E. 8th St.		Little Rock	No			
X-3720595	Ace Glass Co., Inc.		405 Shall Ave.		Little Rock	Yes	Srvy-		
X-3721900	Wes-Pak		9100 Frazier Pike		Little Rock	No	Zero		
X-3722133	Central Chemical		2323 E. Roosevelt Rd.		Little Rock	No			
X-3723221	Meuwly Machine Works Inc	X-3723221	1901 E. 15th St.		Little Rock	No	Srvy-		
X-3723441	National Customs Hollow M	X-3723441	1701 East 22nd St.		Little Rock	Yes	Srvy-		
X-3724984	Reynolds Rubber Stamp Co		800 W Markham		Little Rock	Yes	Srvy-		
X-3725222	Sol Alman		1300 East 9th		Little Rock	No	Srvy-		
X-3725231	Ad Craft of Arkansas, Inc.		1122 W. 3rd St.	PO Box 1001	Little Rock	No	Srvy-		
X-3726677	Myers Supply and Chemical		900 South Arch St.		Little Rock	No			

Little Rock Wastewater
 Industrial Pretreatment Program
 Industry List Summary

Filter Criteria:
 All Permits AND
 Industry No DOES Contain ...x...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-3727400	A-K Glassmenders		1311 Garland St.		Little Rock	Yes	Srvy-		
X-3741000	Professional Forms & Suppli		P.O. Box 649		Little Rock	No	Srvy-		
X-3741160	Pittsburg Illumination		423 Collins Street		Little Rock	No			
X-3741473	Davis Rubber Company		1600 E 15th Street		Little Rock	Yes	Srvy-		
X-3742211	Allied Glass & Aluminum C		817 S. Izard		Little Rock	Yes	Srvy-		
X-3742363	Balfour Printing		P.O. Box 3444		Little Rock	Yes	Srvy-		
X-3742491	Global Manufacturing	X-3742491	1801 E. 22nd St		Little Rock	Yes	Srvy-		
X-3742852	Anchor Paint Manufacturing		2323 Cantrell Rd.		Little Rock	No			
X-3744984	Southern Laser Systems		901 Rock Street		Little Rock	No			
X-3745103	Daily Record		300 S. Izard		Little Rock	Yes	Srvy-		
X-3745611	Mizell Signs and Associates		1017 E 12th St.		Little Rock	No			
X-3746427	Artcrest Inc.		2003 South Louisiana		Little Rock	Yes	Srvy-		
X-3747416	Global Manufacturing		1102 West Daisy Gasto		Little Rock	Yes	Srvy-		
X-3748402	Creative Engineering / Micr	X-3748402	1823 East 17th St.		Little Rock	Yes	Srvy-		
X-3749017	Metal Recycling Corporatio		111 Center Street	Suite 2150	Little Rock	Yes	Srvy-		
X-3750060	Antique Brick Company		919 Shall Ave.		Little Rock	Yes	Srvy-		
X-3750265	Jerry Richardson DDS		209 S. State Street		Little Rock	Yes	Srvy-		
X-3750910	Bale Chevrolet / Honda Coll	X-3750910	100 N. Cross		Little Rock	Yes	Srvy-	06-09-2009	
X-3751141	Phelps Industries		1700 East 9th St.		Little Rock	Yes	Srvy-		
X-3751650	Standard Areo	X-3751650	3223 East 10th St.		Little Rock	Yes	Srvy-		
X-3752227	Laseraim Technologies Inc.		6600 Geyer Springs Ro	Unit 1	Little Rock	Yes	Srvy-		
X-3752438	Graves Lithograph Service		902 Cumberland St.		Little Rock	No			
X-3752985	Arkansas Times Newspaper		201 E Markham, ste. 20	PO Box 34010	Little Rock	Yes	Srvy-		
X-3753000	Gary E Harper MD		123 Pearl Avenue		Little Rock	Yes	Srvy-		

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Little Rock Wastewater
 Industrial Pretreatment Program
 Industry List Summary

Filter Criteria:
 All Permits AND
 Industry No DOES Contain ...x...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-3727400	A-K Glassmenders		1311 Garland St.		Little Rock	Yes	Srvy-		
X-3741000	Professional Forms & Suppli		P.O. Box 649		Little Rock	No	Srvy-		
X-3741160	Pittsburg Illumination		423 Collins Street		Little Rock	No			
X-3741473	Davis Rubber Company		1600 E 15th Street		Little Rock	Yes	Srvy-		
X-3742211	Allied Glass & Aluminum C		817 S. Izard		Little Rock	Yes	Srvy-		
X-3742363	Balfour Printing		P.O. Box 3444		Little Rock	Yes	Srvy-		
X-3742491	Global Manufacturing	X-3742491	1801 E. 22nd St		Little Rock	Yes	Srvy-		
X-3742852	Anchor Paint Manufacturing		2323 Cantrell Rd.		Little Rock	No			
X-3744984	Southern Laser Systems		901 Rock Street		Little Rock	No			
X-3745103	Daily Record		300 S. Izard		Little Rock	Yes	Srvy-		
X-3745611	Mizell Signs and Associates		1017 E 12th St.		Little Rock	No			
X-3746427	Artcrest Inc.		2003 South Louisiana		Little Rock	Yes	Srvy-		
X-3747416	Global Manufacturing		1102 West Daisy Gasto		Little Rock	Yes	Srvy-		
X-3748402	Creative Engineering / Micr	X-3748402	1823 East 17th St.		Little Rock	Yes	Srvy-		
X-3749017	Metal Recycling Corporatio		111 Center Street	Suite 2150	Little Rock	Yes	Srvy-		
X-3750060	Antique Brick Company		919 Shall Ave.		Little Rock	Yes	Srvy-		
X-3750265	Jerry Richardson DDS		209 S. State Street		Little Rock	Yes	Srvy-		
X-3750910	Bale Chevrolet / Honda Coll	X-3750910	100 N. Cross		Little Rock	Yes	Srvy-	06-09-2009	
X-3751141	Phelps Industries		1700 East 9th St.		Little Rock	Yes	Srvy-		
X-3751650	Standard Areo	X-3751650	3223 East 10th St.		Little Rock	Yes	Srvy-		
X-3752227	Laseraim Technologies Inc.		6600 Geyer Springs Ro	Unit 1	Little Rock	Yes	Srvy-		
X-3752438	Graves Lithograph Service		902 Cumberland St.		Little Rock	No			
X-3752985	Arkansas Times Newspaper		201 E Markham, ste. 20	PO Box 34010	Little Rock	Yes	Srvy-		
X-3753000	Gary E Harper MD		123 Pearl Avenue		Little Rock	Yes	Srvy-		

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Little Rock Wastewater Industrial Pretreatment Program Industry List Summary

Filter Criteria:
All Permits AND
Industry No DOES Contain ...x...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-3753301	Solar Eclipse		300 S. Broadway		Little Rock	Yes	Srvy-		
X-3756581	Fabrication Services		1902 E. 22nd St.		Little Rock	No	Srvy-		
X-3756937	Shepherd's		603 W. Markham	PO Box 3665	Little Rock	No	Srvy-		
X-3757633	Arkansas Flag and Banner In		800 W 9th Street		Little Rock	Yes	Srvy-		
X-3757751	River City Janitorial Supply		2400 Cantrell Rd.	Suite 107	Little Rock	Yes	Srvy-		
X-3758229	Bray Sheet Metal		1508 Scott St.		Little Rock	Yes	Srvy-		
X-3758466	Vino's Pizza Pub and Brewe		923 W 7th St.		Little Rock	Yes	Srvy-		
X-3759111	Joshen Paper and Packaging		3120 I-30		Little Rock	No			
X-3759722	PC Hardware and Machine		9101 W. Markham		Little Rock	Yes	Srvy-		
X-3760361	GESCO Inc	X-3760361	2000 Thayer		Little Rock	No			
X3760446	Walk-Winn Plastic Compan		1801 S. Scott Street		Little Rock	Yes	Srvy-		
X-3762397	Magna IV Color Imaging		2401 Commercial Lane		Little Rock	Yes	Srvy-		
X-3763358	Bemberg Iron Works		1000 Fair Point	PO Box 1367	Little Rock	Yes	Srvy-		
X-3763581	Hanson Pipe		1300 Bond St.		Little Rock	Yes	Srvy-		
X-3763623	Triplex Inc.		1119 Calhoun St.		Little Rock	Yes	Srvy-		
X-3764779	Momchilov's Cameria Work	X-376-477	718 S. Gain Street		Little Rock	Yes	Srvy-	08-06-2012	
X-3766961	Little Rock Crate and Basket		1623 East 14th St.		Little Rock	Yes	Srvy-		
X-3768436	Arkansas Graphics		800 S Gaines		Little Rock	Yes	Srvy-		
X-3769191	Little Rock Glass		1101 W. Markham		Little Rock	Yes	Srvy-		
X-3769999	Trivia Marketing		1100 W. Markham		Little Rock	Yes	Srvy-		
X-3982188	Arkansas Paint Source, Inc		13315 Chenal Parkway		Little Rock	Yes	Srvy-		
X-3999121	Heritage Crystal Clean LLC		2711 Confederate Blvd.		Little Rock	Yes	Srvy-		
X-4070712	Power Technology Inc		16302 Alexander Road		Alexander	Yes	Srvy-		
X-4079030	Thyssenkrutp Elevator	Thyssenkru	211 Cornerstone Rd		Alexander	Yes	Srvy-		

A-11x

Little Rock Wastewater
 Industrial Pretreatment Program
 Industry List Summary

Filter Criteria:
 All Permits AND
 Industry No DOES Contain ...x...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-4079239	Short Trax	X-4079239	200 Cornerstone Rd		Alexander	No	Srvy-	05-11-2012	
X-4550000	Acord Packaging		9121 Sibley Hole Road		Little Rock	Yes	Srvy-		
X-4550777	Big Boy Toys Storage		11409 Baseline Road		Little Rock	Yes	Srvy-		
X-4550905	Wighita Press		12109 Stagecoach Rd #		Little Rock	Yes	Srvy-		
X-4551052	Ozark Fluid Power Inc.		10801 E Otter Creek Bl		Mabelvale	Yes	Srvy-		
x-4551600	Custom Direct Printing		11501 Otter Creek Rd.		Mablevale	Yes	Srvy-	05-09-2006	
X-4551766	John Robert Bass DDS		13500 Otter Creek Pkw		Little Rock	Yes	Srvy-		
X-4552557	Supreme Fixture		11900 Vimy Ridge Rd.		Little Rock	Yes	Srvy-		
X-4553168	Horton And Horton Printing	X-4553168	12412 Sardis Road	PO Box 447	Mabelvale	Yes			
X-4553175	Sullivan Automotive	X-4553175	12424 Sardis Road		Mabelvale	Yes			
X-4553333	Moix RV		12903 Interstate 30		Little Rock	Yes	Srvy-		
X-4553500	Granite Designs		8717 Stagecoach Road	Bld. B	Little Rock	Yes	Srvy-		
X-4554545	Anderson Engineering Cons		10205 Rockwood Road		Little Rock	No			
X-4554885	Water Treatment	X-4554885	145 Cornerstone Rd.		Alexander	Yes	Srvy-		
X-4555555	Printing Papers	X-4555555	6101 Patterson		Little Rock	Yes	Srvy-		
X-4556535	Affiliated Foods	X-4556535	12103 Interstate 30		Little Rock	Yes	Srvy-		
X-479-751-5466	QLL Equipment	X-479-751-	3210 Baseline Rd.		Little Rock	Yes	Srvy-	04-26-2011	
X-4900040	O'Neal Steel		8100 Frazier Pike		Little Rock	Yes	Srvy-		
X-4900408	Orbit Fluid Power Company		7428 Lindsey Road		Little Rock	Yes	Srvy-		
X-4901017	Herman Binz & Son Iron W	X-4901017	4900 Thibault Rd.		Little Rock	Yes	Srvy-		
X-4901028	Little Rock Sheet Metal	X-4901028	625 W. Dixon Rd.		Little Rock	No			
X-4901400	Decevninck North America		8801 Frazier Pike		Little Rock	No	Srvy-		
X-4901521	Logistics Services		9001 Lindsey Rd.		Little Rock	Yes	Srvy-		
X-4901613	Safety Kleen		8401 Lindsey Rd.		Little Rock	Yes	Srvy-		

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Little Rock Wastewater Industrial Pretreatment Program Industry List Summary

Filter Criteria:
All Permits AND
Industry No DOES Contain ...x...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-4079239	Short Trax	X-4079239	200 Cornerstone Rd		Alexander	No	Srvy-	05-11-2012	
X-4550000	Acord Packaging		9121 Sibley Hole Road		Little Rock	Yes	Srvy-		
X-4550777	Big Boy Toys Storage		11409 Baseline Road		Little Rock	Yes	Srvy-		
X-4550905	Wighita Press		12109 Stagecoach Rd #		Little Rock	Yes	Srvy-		
X-4551052	Ozark Fluid Power Inc.		10801 E Otter Creek Bl		Mabelvale	Yes	Srvy-		
x-4551600	Custom Direct Printing		11501 Otter Creek Rd.		Mablevale	Yes	Srvy-	05-09-2006	
X-4551766	John Robert Bass DDS		13500 Otter Creek Pkw		Little Rock	Yes	Srvy-		
X-4552557	Supreme Fixture		11900 Vimy Ridge Rd.		Little Rock	Yes	Srvy-		
X-4553168	Horton And Horton Printing	X-4553168	12412 Sardis Road	PO Box 447	Mabelvale	Yes			
X-4553175	Sullivan Automotive	X-4553175	12424 Sardis Road		Mabelvale	Yes			
X-4553333	Moix RV		12903 Interstate 30		Little Rock	Yes	Srvy-		
X-4553500	Granite Designs		8717 Stagecoach Road	Bld. B	Little Rock	Yes	Srvy-		
X-4554545	Anderson Engineering Cons		10205 Rockwood Road		Little Rock	No			
X-4554885	Water Treatment	X-4554885	145 Cornerstone Rd.		Alexander	Yes	Srvy-		
X-4555555	Printing Papers	X-4555555	6101 Patterson		Little Rock	Yes	Srvy-		
X-4556535	Affiliated Foods	X-4556535	12103 Interstate 30		Little Rock	Yes	Srvy-		
X-479-751-5466	QLL Equipment	X-479-751-	3210 Baseline Rd.		Little Rock	Yes	Srvy-	04-26-2011	
X-4900040	O'Neal Steel		8100 Frazier Pike		Little Rock	Yes	Srvy-		
X-4900408	Orbit Fluid Power Company		7428 Lindsey Road		Little Rock	Yes	Srvy-		
X-4901017	Herman Binz & Son Iron W	X-4901017	4900 Thibault Rd.		Little Rock	Yes	Srvy-		
X-4901028	Little Rock Sheet Metal	X-4901028	625 W. Dixon Rd.		Little Rock	No			
X-4901400	Decevninck North America		8801 Frazier Pike		Little Rock	No	Srvy-		
X-4901521	Logistics Services		9001 Lindsey Rd.		Little Rock	Yes	Srvy-		
X-4901613	Safety Kleen		8401 Lindsey Rd.		Little Rock	Yes	Srvy-		

A/W

Little Rock Wastewater Industrial Pretreatment Program Industry List Summary

Filter Criteria:
All Permits AND
Industry No DOES Contain ...x...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-4901740	Perkins Supply Inc.	X-4901740	6208 Lindsey Rd.		Little Rock	No	Srvy-		
X-4902468	Agriculture Service Inc.	X-4902468	405 Dixon Rd.		Little Rock	No	Srvy-		
X-4904200	Lexicon		P.O. Box 16390		Little Rock	Yes	Srvy-		
X-4904716	Entergy Corporation		5001 Thibault Road		Little Rock	Yes	Srvy-		
X-4909112	Schiabo Larovo Corp		9900 industrial Harbor		Little Rock	No	Srvy-		
X-4922209	NOVUS	X-4922209	7920 Slone Drive		Little Rock	Yes	Srvy-		
X-5177152	Cuffs Drycleaners		1123 W. 7th St.	Suite 210	Little Rock	Yes	Srvy-		
X-5370300	Shaw Valve Company		1715 Scott Street		Little Rock	No			
X-5425595	Crain RV		9801 Interstate 30		Little Rock	Yes	Srvy-		
X-5620005	Kerr Paper and Supply		6701 Interstate 30		Little Rock	Yes	Srvy-		
X-5620650	Asher Animal Clinic		6311 Colonel Glenn Ro		Little Rock	Yes	Srvy-		
X-5621463	Caruthers & Wolverton PLL		6019 Arbor Cove		Little Rock	Yes	Srvy-		
X-5621734	Hackman Paint & Supply Co		7600 S University Aven		Little Rock	Yes	Srvy-		
X-5621872	Windsor Door		P.O. Box 8915		Little Rock	Yes	Srvy-		
X-5622734	XPEDX		6200 Murray St.		Little Rock	No			
X-5623942	Arkansas Sign and Neon Co		8525 Distribution Drive		Little Rock	Yes	Srvy-		
X-5623986	C & C Sheet Metal		7102 Mabelvale Cutoff		Little Rock	No	Zero		
X-5624772	Mid South Machine	X-5624772	8024 Stanton Rd.		Little Rock	Yes	Srvy-		
X-5625565	United Engines		9401 Interstate 30		Little Rock	Yes	Srvy-		
X-5626295	Davis Trailer and Equipment		7609 Colonel Glenn Ro		Little Rock	Yes	Srvy-		
X-5628040	Phillips Corporation / DBA	X-5628040	7123 Interstate 30	Suite 28	Little Rock	No	Srvy-		
X-5628317	Pilkington		6619 Woodson Rd.	Suite B	Little Rock	Yes	Srvy-		
X-5628500	Little Rock Distribution, LL		4300 West 65th Street		Little Rock	Yes	Srvy-		
X-5628535	Oxford Screen Printing		7900 Asher Ave		Little Rock	Yes	Srvy-		

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Little Rock Wastewater Industrial Pretreatment Program Industry List Summary

Filter Criteria:
All Permits AND
Industry No DOES Contain ...x...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-5628883	Fu Weng Foods		4400 West 65th St.		Little Rock	Yes	Srvy-		
X-5650777	Precision Industries		8124B Scott Hamilton		Little Rock	Yes	Srvy-		
X-5650949	Hinson Rentals LLC DDS		5304 Mabelvale Pike		Little Rock	Yes	Srvy-		
X-5651546	Gregory Salisbury Power Pr		4700 Westwood Ave.		Little Rock	Yes	Srvy-		
X-5651574	Donald D Cobb Jr DDS		6600 Baseline Road		Little Rock	Yes	Srvy-		
X-5651717	Williams Air compressor	X-5651717	4600 Foster		Little Rock	No			
X-5652222	Maaco Collision	X-5652222	6101 West 65th St.		Little Rock	Yes	Srvy-		
X-5653517	Rusty Brock Glass Inc.		5624 Fisher St.		Little Rock	Yes	Srvy-		
X-5653943	William M Flurry DDS		7301 Baseline Road		Little Rock	Yes	Srvy-		
X-5654611	Cloverdale Animal Hospital		7201 Baseline Road		Little Rock	Yes	Srvy-		
X-5656363	A. C. Sales, Inc		8501 Distribution Drive		Little Rock	Yes	Srvy-		
X-5680200	Arkansas Bag and Equipmen		8001 Assembly Court		Little Rock	Yes	Srvy-		
X-5681300	Michele Smith Designs Inc.		21701 Lawson Rd.		Little Rock	No			
X-5681496	American Art Glass and Alu		6006 Geyer Springs Rd.		Little Rock	No			
X-5682090	Heral Enterprises Inc.		P.O. Box 193666		Little Rock	Yes	Srvy-		
X-5682425	Harris & Reynolds Family D		6800 Baseline Road		Little Rock	Yes	Srvy-		
X-5683116	Motion Industries		5312 W 65th St.		Little Rock	No	Srvy-		
X-5684088	Razorback Bumper Service		7911 Arch St.		Little Rock	Yes	Srvy-		
X-5684390	Hydradyne Hydraulics LLC		9514 I-30		Little Rock	Yes	Srvy-		
X-5685496	Johnson Products		6209 Murray St.		Little Rock	Yes	Srvy-		
X-5685700	IBT		8203 Distribution Dr.		Little Rock	No	Srvy-		
X-5685880	Wesley C Hamilton DDS		7622 Morris Drive		Little Rock	Yes	Srvy-		
X-5687356	Rubber & Gasket Company		7623 Enmar Dr.		Little Rock	Yes	Srvy-		
X-5687669	Personalized Bottle Water		8001 Assembly Ct.		Little Rock	Yes	Srvy-		

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Little Rock Wastewater
 Industrial Pretreatment Program
 Industry List Summary

Filter Criteria:
 All Permits AND
 Industry No DOES Contain ...x...

A-1P

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-5687868	concentra Medical Center		10101 Mabelvale Plaza		Little Rock	Yes	Srvy-		
X-5692000	AHTD - Sign Shop and Mat	X-5692000	11300 Baseline Rd.		Little Rock	Yes	Srvy-		
X-5701159	Arkansas Bureau of Standar		4608 West 61st St.		Little Rock	Yes	Srvy-		
X-5708515	D'ivan Photo & Video		5319 W 65th Street		Little Rock	Yes	Srvy-		
X-5807806	Schickel's Cleaners	X-580-780	11609 Cantrell Rd.		Little Rock	Yes	Srvy-		
X-5908667	Turner Welding		4310 W. 65th St.		Little Rock	No			
X-6182283	FiberGlass System	X-6182283	2700 W 65th Street		Little Rock	Yes	Srvy-		
X-6339491	Target Printing - Duplicate	X-6339491	1907 Appianway		Little Rock	No	Srvy-		
X-6611303	Forest Park Medical Clinic		1119 S Van Buren		Little Rock	Yes	Srvy-		
X-6617653	Saughey's Paint and Sandblast		4621 Asher Ave.		Little Rock	No			
X-6619006	Bruce F Mitchell DDS		500 S University Avenu Suite 511		Little Rock	Yes	Srvy-		
X-6619545	House of Marble		1010 Jessie Rd.		Little Rock	Yes	Srvy-		
X-6630100	Vestcom		7604 Kanis Rd.		Little Rock	Yes	Srvy-		
X-6630123	Arkansas Sheet Metal Co In		2706 W 11th Street		Little Rock	Yes	Srvy-		
X-6631284	Hillcrest Animal Hospital		2900 Kavanaugh Blvd		Little Rock	Yes	Srvy-		
X-6632908	Horton's Orthotic Lab		5220 West 12th St.		Little Rock	Yes	Srvy-		
X-6633611	Pro Window & Door		4113 Asher Av.		Little Rock	Yes	Srvy-		
X-6634454	State Printing and Publishin		3300 W. 12th St.		Little Rock	No			
X-663-7302	Mini Label	X-663-730	2600 W. 10th St.		Little Rock	Yes	Srvy-		
X-6639415	APMI		5905 R Street		Little Rock	Yes	Srvy-		
X-6639491	Target Printing		1907 Appianway		Little Rock	No	Srvy-		
X-6640769	Hillcrest Family Clinic		4601 Woodlawn Drive		Little Rock	Yes	Srvy-		
X-6641733	Anita L. Aebersold DDS		820 N University Ave		Little Rock	Yes	Srvy-		
X-6642217	Martin Menees Jr DDS		1808 North Taylor		Little Rock	Yes	Srvy-		

Little Rock Wastewater
 Industrial Pretreatment Program
 Industry List Summary

Filter Criteria:
 All Permits AND
 Industry No DOES Containx...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-6644718	Trade Fixtures		1501 Westpark Dr		Little Rock	Yes	Srvy-		
X-6644870	HJ Baker & Bro. Inc	X-6644870	1123 S. University Ave		Little Rock	No			
X-6645095	G.C. Evans Sales & Mfg. Co		3300 S. Woodrow	PO Box 1124	Little Rock	Yes	Srvy-		
X-6645300	Marina Cove LLC		2228 Cottdonale Lane		Little Rock	Yes	Srvy-		
X-6646200	Little Rock Healthcare and		5720 West Markham		Little Rock	Yes	Srvy-		
X-6646366	Chester F Hight DDS		523 N. University Ave		Little Rock	Yes	Srvy-		
X-6646700	Clear Mountain Spring Wate		3201 South Elm St.		Little Rock	Yes	Srvy-		
X-6646888	Tracy T Windham DDS		5500 West Markham		Little Rock	Yes	Srvy-		
X-6647109	J M Products		3117 Joshua St.		Little Rock	No	Srvy-		
X-6661188	Steve Mangan DDS		2011 N Van Buren		Little Rock	Yes	Srvy-		
X-6662801	Gilbert Caver DDS		5307 Kavanaugh Blvd.		Little Rock	Yes	Srvy-		
X-6665451	Arkansas Dermatology Clini		500 S University Avenu		Little Rock	Yes	Srvy-		
X-6668592	H.T. Watts Co.		4312 Asher Ave.		Little Rock	No	Srvy-		
X-7664100	Rock Town Distillery	Rock Town	1216 East 6th St.		Little Rock	Yes	Srvy-		
X-8016300	LM Glasfiber	X-8016300	7400 Scott Hamilton		Little Rock	Yes	Srvy-		
X-8016366	LM Glasfiber	X-8016366	8000 Frazier Pike		Little Rock	Yes	Srvy-		
X-8212101	Wickity Wax		17201 Lawson Rd.		Little Rock	No	Srvy-		
X-8477200	TAS Environmental	X-8477200	180 Cornerstone Rd		Alexander	Yes	Srvy-		
X-8517101	Arkansas Leather Care	X-8517101	2 Weatherwood Ln		Maumelle	Yes			
X-8708307398	Green Way Bio Energy					No			
X-8708307472	Delta Plastics of the South	X-8708307	8801 Frazier Pike		Little Rock	Yes	Srvy-		
X-8881211	Geo Specialty Chemicals	X-8881211	9213 Arch Street		Little Rock	Yes	Srvy-	08-08-2012	
X-8884229	Precision Mold Weld		18307 Arch St.		Little Rock	No	Zero		
X-9459425	Purvis Industries	X-945-942	Interstate 30		Little Rock	Yes	Srvy-	09-21-2009	

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Little Rock Wastewater
 Industrial Pretreatment Program
 Industry List Summary

Filter Criteria:
 All Permits AND
 Industry No DOES Contain ...x...

Permit No.	Permittee	Site ID	Site Address 1	Site Address 2	City	Active ?	Permit Class	Effective Date	Expiration Date
X-9548866	Inside Effects	X-9548866	4205 S. Shackleford Ste		Little Rock	Yes	Srvy-		
X-9783742	Little Rock Cardiology Clini		7 Shackleford West Blv		Little Rock	Yes	Srvy-		

A-10

Attachment A-2

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
ARTICLE NO. 7011-0470-0000-4030-5257

February 6, 2012

Warren Atkins, Solid Waste Service Manager
City of Little Rock Landfill
10803 Ironton Road
Little Rock AR, 72206

COPY

RE: Industrial Wastewater Discharge Permit Renewal Application

Dear, Mr. Warren Atkins:

A review of our records indicates that your Industrial Wastewater Discharge Permit # S-47 will expire on March 31, 2012. In accordance with City of Little Rock Ordinance # 19,895, Section 4, all permittees who wish to continue discharging industrial wastewater into the Little Rock Wastewater system must have a current and valid Industrial Wastewater Discharge Permit.

Enclosed with this letter is an application for renewal of your Industrial Wastewater Discharge Permit and instructions for filling out the renewal form. This completed form must be submitted no later than March 15, 2012 to the Environmental Assessment Division of Little Rock Wastewater at the following address:

Little Rock Wastewater
ATTN.: Jeff Davis, Pretreatment Supervisor
11 Clearwater Drive
Little Rock, AR 72204

Furthermore, 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, the EPA Regional Waste Management Division Director and Arkansas Department of Environmental Quality (ADEQ) Hazardous Waste Division, in writing of any discharges to 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 ADEQ Hazardous Waste Division at 501-682-0833.

Your cooperation in this matter is appreciated. If you have any questions concerning this letter, the permit renewal process, or need assistance with the form, please contact Mr. Jeff Davis at (501) 688-1595 or me at (501) 688-1492

Sincerely,
LITTLE ROCK WASTEWATER



Cornelius Jones, Industrial Inspector
Environmental Assessment Division

Enclosures: Industrial Wastewater Discharge Permit Application Form

File: City of Little Rock Landfill Permit File

**INSTRUCTIONS FOR COMPLETING THE
INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION FORM**

Note: All items in the Industrial Wastewater Discharge Permit Application Form must be completed. Failure to submit a complete application could result in a delay in the renewal or issuance of your permit.

Section A - General Facility Information

1. Provide official legal name of your company and the local facility name if applicable.
2. List the local facility address where mail is received.
3. List the physical location of the local facility (street address).
4. List the main telephone and fax number(s) of the local facility and an emergency or after hours telephone number(s) where someone representing the local facility can be reached.
5. Print the names of those persons authorized to represent the local facility and their titles. A primary and Secondary contact must be listed.
6. Print the name and title of the signatory authority for the local facility. Definitions of signatory authority can be found under Section H of the Industrial Wastewater Discharge Permit Application Form.
7. If the local facility has district or area office, list the complete mailing address, telephone number, fax number, and contact person at the district/area office.
8. If the local facility has corporate office, list the complete mailing address, telephone number, fax number, and contact person at the corporate office.
9. List the name of the top CEO responsible at the highest level of the company structure. Provide the complete mailing address, telephone, and fax numbers.
10. List all Standard Industrial Classification (SIC) Codes for this company or facility. If you have questions regarding SIC Codes, please contact the Environmental Assessment Department of Little Rock Wastewater Utility for assistance.
11. Indicate environmental permits held by this company or facility (YES or NO). If yes, list the permit reference number. Environmental permits will include your Little Rock Wastewater Utility Industrial Discharge Permit and may include permits issued by Arkansas Department of Environmental Quality and/or the U.S. Environmental Protection Agency (EPA) for air, water (National Pollutant Discharge Elimination System - NPDES), stormwater (NPDES), solid waste, hazardous waste (Resource Conservation and Recovery Act - RCRA), incinerators, or other environmental permits.

Section B - Water Use Information

1. List all Little Rock Municipal Water Works account numbers for this facility. These account numbers will be found on your monthly water and sewer bills.
2. Indicate whether all water used at this company or facility comes from Little Rock Municipal Water Works (YES or NO). If NO, please list the source(s) of additional water, such as wells, reservoirs, etc., and the average daily use from these sources.
3. Indicate whether all process water at this company or facility is discharged to the sanitary sewer (YES or NO). If NO, please indicate how the additional water is disposed of or used.
4. Indicate whether this facility receives a diversion credit for waters which are not discharged to sanitary sewer (YES or NO). If YES, you must list all meters by serial number, size, and average use in gallons per day. If you have any questions about diversions or diversion credits, please contact the Environmental Assessment Department at Little Rock Wastewater Utility.

Section C - Facility Operating Characteristics

1. List the days and hours of normal operation of this company and facility, e.g. Monday - Friday, 8:00 a.m. - 4:30 p.m.
2. List the start times and stop times of each shift, the number of employees, and primary functions conducted during that shift.
3. Indicate whether production is subject to seasonal variation (YES or NO). If YES, describe the seasonal variation, listing months of high and/or low production.
Indicate any time(s) of the year when this company or facility is not in operation other than weekends or normal holidays (YES or NO). If YES, list the time(s) of the year as specifically as possible when this company or facility is shut down or otherwise not in operation.

A-2b

Section D - Process Information

1. List all major products, and/or services provided by this company. Products include the end product of the manufacturing or fabrication processes. Services can include inspection, repair, etc.
2. List all processes conducted at this facility. Processes include the major steps involved in production of the end product. Review and complete Attachment 1 for identifying federal regulated processes.
3. List all raw materials used at this facility in the production processes.
4. List all sources of wastewater generation at this facility in regard to the process(es) listed in item #1.
5. Indicate whether any new processes have been added at this facility (YES or NO) since the last Industrial Wastewater Discharge Permit Application Form. If YES, explain.
6. Indicate whether any hazardous waste is discharged to the Sanitary Sewer (City of Little Rock Ordinance 19,895; Section 6.10.).

Section E - Chemical Inventory Information

1. If this is a new application, provide a complete list of all chemicals used at the facility. Also, provide a copy of the manufacturer's MSDS, or (B) If you are renewing an existing discharge permit, indicate if there have been any changes to the facility chemical inventory since a previous permit application? (YES or NO) For both A and B above, cross reference the Material Safety Data Sheets (MSDS) of chemicals used at the applicant facility against the pollutant list on Attachment 2. If a pollutant on the list is contained in any of your process chemicals or is stored at the facility please indicate on the attachment and return with this application. Submit a copy of all MSDS or a complete chemical listing for chemicals used or stored at this facility if not previously submitted to Little Rock Wastewater Utility.
2. Indicate (YES or NO) if the facility has a Spill Control Plan. If NO, submit a plan of action for procedures, policies, and mechanism, that controls and prevents spills or slug discharges from entering the sanitary sewer (City of Little Rock Ordinance 19,895; Article, Section 5.2, B.3).
3. Indicate any changes in the facility Spill Control Plan. If YES, explain and attach any pertinent information about the changes, such as diagrams, plans, etc.

Section F - Wastewater Treatment

1. Describe any wastewater treatment processes conducted at this facility prior to the discharge of the water to the sanitary sewer. Attach a copy of the most current plans and diagrams. If no treatment processes are conducted, indicate "not applicable". Review and complete the Attachment 3 check list of treatment processes.
2. If Industrial Wastewater Discharge Permit Application Form is for permit renewal indicate (YES or NO) whether any new treatment equipment has been added. If YES, explain and attach diagrams, plans, and other pertinent information on the new equipment.
3. Indicate whether any of the treatment processes listed in item #1 above (YES or NO) result in the generation of a solid waste. If YES, indicate how those solids are disposed.
4. List other policies or procedures used to prevent discharge of pollutants.
5. List all flow meters measuring wastewater flow and explain how the accuracy of these flow meter(s) is maintained.
6. Report the average monthly wastewater discharge to the sanitary sewer. Little Rock Water Works reports the water consumption to you in 100 cubic feet. There are 748 gallons per 100 cubic feet of water. If there are no diversions then water discharged will equal water consumption.

Section G - Freedom of Information

This section describes procedures to use if any of the information you submit to Little Rock Wastewater Utility in respect to this Industrial Wastewater Discharge Permit Application Form may be considered trade secrets or proprietary information. If you believe that any of the information contained in your permit application should be considered confidential, please follow the instructions provided in the application under this section.

Section H - Certification and Signature

**Instructions For Completing The
Industrial Wastewater Discharge Permit Application Form**

**Form No.: IPP-02
Page 3 of 3**

Section H of the Industrial Wastewater Discharge Permit Application Form lists three (3) categories of individuals who are considered authorized representatives. This Industrial Wastewater Discharge Permit Application Form must be signed by an authorized representative of the company or facility as defined by EPA Regulation 40 CFR 403. Any signature other than that of an authorized representative will cause this Industrial Wastewater Discharge Permit Application Form to be considered incomplete and may cause a delay in the issuance of the Industrial Wastewater Discharge Permit.

**LITTLE ROCK WASTEWATER UTILITY
ENVIRONMENTAL ASSESSMENT DIVISION
INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION FORM**

- CHECK ONE: Permit Renewal Application. Applicant currently holds a discharge permit issued by Little Rock Wastewater Utility.
- New Industry Application. Applicant proposes to discharge industrial wastewater to the sanitary sewer or is currently discharging but does not hold a discharge permit.

Note: Facility submitted discharge application in October 2007, Permit is pending approval of final connection

Section A - General Facility Information

1. A. Company Name: Porocel Industries, LLC
 B. Local Facility Name if Applicable: _____
 Check here if No. 1 (B) is not applicable
2. Local Facility Mailing Address: 10300 Arch Street Pike, Little Rock, AR 72206
3. Location of Local Facility (if different from above): _____
4. Local Facility Telephone No.: (501) 888-1357 Fax No. (501) 888-8692
 Emergency or After Hours Telephone #(s): _____
5. Name and title of person(s) authorized to represent your firm or company in official capacity in dealings with Little Rock Wastewater Utility (both primary and secondary contacts).
 Primary Contact: Gerald Ashford Title: Plant Manager
 Secondary Contact: Kenny Doyle Title: Quality and Environmental System Coordinator
6. Signatory Authority (see Section H of this application).
 Name: Gerald Ashford Title: Plant Manager
7. If the local facility has district or area office, list the complete mailing address, telephone number, fax number, and contact person at the district/area office.
 Check here if No. 7 is not applicable

8. If the local facility has corporate office, list the complete mailing address, telephone number, fax number, and contact person at the corporate office.
 Check here if No. 8 is not applicable

9. Provide the name of top corporate, Chief Executive Officer. Provide the complete mailing address, telephone, and fax numbers.

Bill Kist - Chief Financial Officer
10300 Arch Street Pike, Little Rock, Arkansas 72206
(501) 888-1357 (telephone) (501) 888-8692

10. List all Standard Industrial Classification Numbers (SIC Codes) for this facility:

2819				
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11. List below all, if any, Environmental Permits currently held by the applicant facility. Name the issuing agency and list permit number(s):

A. Little Rock Wastewater Utility Industrial Wastewater Discharge Permit #: YES, NO

N-71

B. Arkansas Department of Pollution Control and Ecology RCRA Permit #: YES, NO

ARD006337240

C. Arkansas Department of Pollution Control and Ecology Stormwater Permit #: YES, NO

ARR00A087

D. Arkansas Department of Pollution Control and Ecology Air Permit #: YES, NO

0635-AR-10

E. Arkansas Department of Pollution Control and Ecology Incinerator Permit #: YES, NO

F. Other Environmental Permits (if yes, list type of permit, issuing agency, and permit number):

Section B - Water Use Information

1. List all Little Rock Municipal Water Works Account Numbers for this facility:

507-2101-300				
--------------	--	--	--	--

Monthly Total Consumption: 68,938.6 cu. ft.

2. Does all water used at this facility come from Little Rock Municipal Water Works? YES, NO

If NO, please list the source(s) of additional water and average daily usage:

A-2g

3. Is all process water discharged to the sanitary sewer? YES, NO

If NO, how is the additional water used or disposed of (i.e., water into product, cooling tower evaporation, boiler makeup water, discharge to storm drain, etc.)?

The facility processes result in a large amount of evaporation, particularly during the hot summer months

4. Does this facility receive a diversion credit for waters that are not discharged to the sanitary sewer? YES, NO

If YES, list all meters below:

Serial # _____ Size: _____ Average Discharge or Use (gallons per day) _____

Serial # _____ Size: _____ Average Discharge or Use (gallons per day) _____

Serial # _____ Size: _____ Average Discharge or Use (gallons per day) _____

Serial # _____ Size: _____ Average Discharge or Use (gallons per day) _____

Section C - Facility Operating Characteristics

1. List the days and hours of normal operation for this facility: 24 hrs/7 days a week

2. List the times of each shift, the average number of employees per shift, and indicate whether the shift is primarily production, maintenance, cleanup, administrative, and/or other (please explain):

1st Shift Start Time: 6 am Stop Time: 6 pm Number of Employees: approx. 18

Primary Function(s) Production

2nd Shift Start Time: 6 pm Stop Time: 6 am Number of Employees: approx. 17

Primary Function(s) Production

3rd Shift Start Time: _____ Stop Time: _____ Number of Employees: _____

Primary Function(s) _____

3. Is production subject to seasonal variation? YES, NO. If YES, describe:

4. Are there any times during the year (other than normal holidays or weekends) that this facility is not in operation? YES, NO. If YES, describe:

Section D - Process Information

- 1. List all major products, and/or services provided by this company or facility (attach additional sheets if necessary).

Industrial dry absorbents, industrial catalysts

- 2. List and describe all processes conducted at this facility. Review Attachment 1 to this application and check any Federal categorical listed process (40 CFR 400 series) which are performed at this facility and return the attachment with this application.

Porocel Industries, LLC processes various metallic and non-metallic minerals and products for use in the absorbent and catalyst industry. Operations at the facility encompass alumina tri-hydrates, activated alumina, bentonite, Fuller's Earth, and others. See attached process description

- 3. List all raw materials used at this facility in the production process(es) (attach additional sheets if necessary):

Alumina tri-hydrate, activated alumina, bentonite, Fuller's Earth

- 4. List all major sources of wastewater generation at this company or facility related to the process(es) described in item #1 above (i.e., milk production - equipment and floor cleaning water, copper plating - alkaline and acid cleaning rinse water) (attach additional sheets if necessary):

Discharge from Tri-Mer NOx Scrubber, reverse osmosis system and water softener reject,

sanitary wastewater

- 5. Have any new production processes been added at this facility since the last application for a discharge permit? YES, NO. If YES, explain:

A-21

6. Does this facility discharge to the Sanitary Sewer (in process waste or otherwise) any substance, which, if otherwise disposed of would be considered a hazardous waste as defined in 40 CFR 261?
 YES, NO. If YES, explain:

Section E - Chemical Inventory Information:

1. (A) If this is a new application, provide a complete list of all chemicals used at the facility. Also, provide a copy of the manufacturer's MSDS, or (B) If you are renewing an existing discharge permit, have there been any changes in this facility's chemical inventory since a previous permit application? YES, NO N/A. For both A and B above, cross reference the Material Safety Data Sheets (MSDS) of chemicals used at the applicant facility against the pollutant list on Attachment 2. If a pollutant on the list is contained in any of your process chemicals or is stored at the facility please indicate on the attachment and return with this application. Submit a copy of all MSDS or a complete chemical listing for chemicals used or stored at this facility if not previously submitted to Little Rock Wastewater Utility. **Submitted with previous application**
2. Does this facility have a Spill Control Plan to submit with this application or has already submitted to the Utility? YES NO. If NO, submit a plan of action for addressing procedures, policies, mechanism, that controls and prevents spills or slugs discharges from entering the sanitary sewer. The City of Little Rock Ordinance 15,344, Article VI, Section 10, requires an approved "Spill Control Plan" before discharging to the sanitary sewer. **See attached revised Spill Control Plan**
3. Have there been any changes to this facility's Spill Control Plan since the last permit application? YES, NO. If YES, please explain below and attach any revisions to your plan to this permit application.

Revised plan attached

Section F - Wastewater Treatment

1. Describe all wastewater treatment processes conducted at this facility prior to discharge to the sanitary sewer (attach additional sheets if necessary). Complete Attachment 3 of the application to check the pretreatment processes conducted at this facility:

The sanitary wastewater is treated through the primary septic tank and then discharged to the secondary holding tank prior to discharge to the city. The scrubber discharge, RO and water softener reject is discharged directly to the secondary holding tank where some settling takes place prior to the discharge to the city.

A-2;

2. Has any new wastewater treatment equipment, including sand traps, oil/water separators, grease traps, solids traps, or flow equalization equipment been added since the previous permit renewal application? YES, NO. If YES, explain and attach diagrams, plans, etc. to this renewal application.

3. Do any of the treatment processes utilized by this facility result in the generation of a solid waste? YES, NO. If YES, please indicate how these solids are disposed. For grease, sand, oil, and solids traps, list the cleaning frequency and person or company that removes the solids and/or oil.

Sludge produced in the septic tank is periodically pumped out by a licensed sewer sludge pumper and disposed of properly. Significant amounts of solids are not generated from the process wastewater discharge. However, the secondary tank is checked routinely to ensure that solids do not accumulate within the tank. Solids removed from the tank are disposed of by an approved solid waste landfill.

4. Describe pollution prevention policies or procedures utilized by your facility that controls discharges of pollutants into the sanitary sewer system:

The only connection to the city sewer system is at the secondary holding tank. ~~The discharge from~~

the scrubber and the RO/water softener reject water are the only processes with connections to the holding tank. There are no drains within the active portions of the plant. The restrooms are located in an area separate from the active plant and are connected directly to the primary septic tank which discharges into the secondary holding tank.

5. List all flow meters used to measure discharge of wastewater through and/or from treatment processes including total flow measurements. NA

Name and Model # Accuron Model 7100 Serial # 12792 Size 6-inches

Name and Model # _____ Serial # _____ Size: _____

6. Average monthly volume of wastewater discharge to the sanitary sewer Design Flow - (15,100 gpd) 2018.9 cu. ft (Process Wastewater - 14,400 gpd, Sanitary Wastewater - 700 gpd) . the actual average flow recorded during 2010 was 5,585 gpd. However, the discharge flow is expected to increase during 2011 due to increased production.

Section G - Freedom of Information

City of Little Rock Ordinance 19,895 and EPA Regulation 40 CFR 403 requires that the information contained in this application be available for public inspection without reservation. Exceptions are made for trade secrets or proprietary information. If any of the material contained in this application can be considered a trade secret or proprietary business information, it must have the words "**CONFIDENTIAL BUSINESS INFORMATION**" on the applicable pages and the information must be submitted on separate pages. If the material can be considered confidential, it will be filed separately in a locking file cabinet. If the information cannot be considered confidential, notification will be given within ten (10) days of receipt stating the reason(s) the information cannot be held confidential.

Section H - Certification and Signature

This application is to be signed by an authorized official of the facility after completion of the permit application and review of the information contained in the application.

Authorized officials are defined by EPA Regulation 40 CFR 403 as follows:

1. A responsible corporate officer, if the facility is a corporation
 - a. A president, secretary, treasurer, or vice-president of the corporation in charge of a principle business function, or any other person who performs similar policy- or decision-making functions for the corporation.
 - b. The manager of one or more manufacturing, production, or operation facilities provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
2. A general partner or proprietor if the facility is a partnership or sole proprietorship respectively.
3. A duly authorized representative of the individuals listed in items 1 or 2 above if:
 - a. The authorization has been made in writing by any of the individuals listed in items 1 or 2 above; and
 - b. The authorization specifies either an individual or a position having responsibility for the overall operation of the facility, such as a plant manager, superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the facility; and
 - c. The written authorization has been submitted to Little Rock Wastewater Utility.

The authorized official of the facility shall make the following certification statement:

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

Attested By:

Gerald Ashford, Plant Manager

Name and Title (Please Type or Print)

Gerald Clehford

Signature

5/18/11

Date

For Little Rock Wastewater Utility Office Use Only:

Permit Application Received by: Jeff Davis Date: 5-23-11

Initial Review Conducted by: Mike Murders Date: 6-2-11

- Jeff Davis, Pretreatment Supervisor
- Mike Murders, Pretreatment Supervisor

Comments: metallic minerals? covered in permit? Nickel? Arsenic?
settling tanks - cleaned? frequency? discharges to secondary, not primary?
Copper/ZINC ← Clarify ←

Facility Inspection Conducted by: Tony Roll Date: 6/21/11
 Industrial Inspector: Allen Gatlin, Paul Foster, Tony Roll, Cornelius Jones

Comments: NOT ALL MINERALS COVERED - SUGGESTED WE ADD Cr, As, Ni, Cu AND
POSSIBLE TPC. Settling tanks NOT cleaned 2010 - corrections to bag
houses have cut down solids discharges. Secondary is private pump station.

Pretreatment Supervisor Review: _____ Date: _____
 Mike Murders

Comments: _____

Pretreatment Supervisor Review: Jeff Davis Date: 6-29-11
 Jeff Davis

Comments: Permit renewal 7-1-11
ADD AR, Cr, Copper, Nickel

A-Z-N

ATTACHMENT 1

If your facility employs or will be employing processes in any of the business activities below (regardless of whether they generate wastewater, waste sludge, or hazardous waste), place a check beside the category or business activity (check all that apply).

Industrial Categories*

- | | |
|---|--|
| <input type="checkbox"/> Aluminum Forming | <input type="checkbox"/> Nonferrous Metals Manufacturing |
| <input type="checkbox"/> Asbestos Manufacturing | <input type="checkbox"/> Organic Chemicals Manufacturing |
| <input type="checkbox"/> Battery Manufacturing | <input type="checkbox"/> Paint and Ink Formulating |
| <input type="checkbox"/> Builders Paper and board Mills | <input type="checkbox"/> Paving and Roofing Manufacturing |
| <input type="checkbox"/> Carbon Black Mfg. | <input type="checkbox"/> Pesticides Manufacturing |
| <input type="checkbox"/> Coal Mining | <input type="checkbox"/> Petroleum Refining |
| <input type="checkbox"/> Coil Coating | <input type="checkbox"/> Pharmaceutical |
| <input type="checkbox"/> Copper Forming | <input type="checkbox"/> Plastic and Synthetic Materials Manufacturing |
| <input type="checkbox"/> Electric and Electronic Components Mfg | <input type="checkbox"/> Plastics Processing Manufacturing |
| <input type="checkbox"/> Electroplating | <input type="checkbox"/> Porcelain Enamel |
| <input type="checkbox"/> Feedlots | <input type="checkbox"/> Pulp, Paper, and Fiberboard Manufacturing |
| <input type="checkbox"/> Fertilizer Manufacturing | <input type="checkbox"/> Rubber |
| <input type="checkbox"/> Foundries (Metal Molding and Casting) | <input type="checkbox"/> Soap and Detergent Manufacturing |
| <input type="checkbox"/> Glass Manufacturing | <input type="checkbox"/> Steam Electric |
| <input type="checkbox"/> Grain Mills | <input type="checkbox"/> Sugar Processing |
| <input type="checkbox"/> Inorganic Chemicals | <input type="checkbox"/> Textile Mills |
| <input type="checkbox"/> Iron and Steel | <input type="checkbox"/> Timber Products |
| <input type="checkbox"/> Leather Tanning and Finishing | <input type="checkbox"/> Transportation Equipment Cleaning |
| <input type="checkbox"/> Metal Finishing | <input type="checkbox"/> Pesticide Formulating and Packaging |
| <input type="checkbox"/> Nonferrous Metals Forming | <input type="checkbox"/> Landfills |
| <input type="checkbox"/> Centralized Waste Treatment | |

Other Category Guidelines Under Development

- Metal Products and Machinery
- Meat Products
- Industrial Container and Drum Cleaners

* A facility with processes inclusive to these categories may be subject to discharge pretreatment standards listed in the Code of Federal Regulations. If you are not sure if your process is regulated by a category listed above review the Code of Federal Regulations. Contact the Little Rock Wastewater Utility Industrial Pretreatment Coordinator if further assistance is needed.

Describe below all processes at your facility that would be regulated under a category listed above:

Check here if none of the above categories apply to your facility

A-20

ATTACHMENT 2

By review of Material Data Safety Sheets and inventory of chemicals at your facility indicate by checking below those that are present at your facility.

- | | | |
|--|--|---|
| <input type="checkbox"/> Acrolein | <input type="checkbox"/> Benzo (a) anthracene | <input type="checkbox"/> Beta-BCH |
| <input type="checkbox"/> Acrylonitrile | <input type="checkbox"/> Benzo (a) pyrene | <input type="checkbox"/> Gamma-BHC |
| <input type="checkbox"/> Benzene | <input type="checkbox"/> 3,4-Benzofluoranthene | <input type="checkbox"/> Delta-BHC |
| <input type="checkbox"/> Bromoform | <input type="checkbox"/> Benzo (ghi) perylene | <input type="checkbox"/> Chlorodane |
| <input type="checkbox"/> Carbon tetrachloride | <input type="checkbox"/> Benzo (k) fluoroanthene | <input type="checkbox"/> 4, 4-DDT |
| <input type="checkbox"/> Chlorobenzene | <input type="checkbox"/> Bis (2-Chloroethoxyl) methane | <input type="checkbox"/> 4, 4-DDE |
| <input type="checkbox"/> Chlorodibromomethane | <input type="checkbox"/> Bis (2-Chloroethyl) ether | <input type="checkbox"/> 4, 4-DDD |
| <input type="checkbox"/> Chloroethane | <input type="checkbox"/> Bis (2-Chloroisopropyl) ether | <input type="checkbox"/> Dieldrin |
| <input type="checkbox"/> 2-Chloroethyl vinyl ether | <input type="checkbox"/> Bis (2-Ethylhexyl) phthalate | <input type="checkbox"/> Endosulfan-sulfate |
| <input type="checkbox"/> Chloroform | <input type="checkbox"/> 4-Bromophenyl phenyl ether | <input type="checkbox"/> Endrin |
| <input type="checkbox"/> Dichlorobromomethane | <input type="checkbox"/> Butylbenzyl phthalate | <input type="checkbox"/> Endrin aldehyde |
| <input type="checkbox"/> 1, 1-Dichloroethane | <input type="checkbox"/> 2-Chloronaphthalene | <input type="checkbox"/> Heptachlor |
| <input type="checkbox"/> 1, 2-Dichloroethane | <input type="checkbox"/> 2-Chlorophenyl phenyl ether | <input type="checkbox"/> Heptachlor epoxide |
| <input type="checkbox"/> 1, 1-Dichloroethylene | <input type="checkbox"/> Chrysene | <input type="checkbox"/> PCB-1242 (Arochlor 1242) |
| <input type="checkbox"/> 1, 2- Dichloropropane | <input type="checkbox"/> Dibenzo (a,h) anthracene | <input type="checkbox"/> PCB-1254 (Arochlor 1254) |
| <input type="checkbox"/> 1, 3 - Dichloropropylene | <input type="checkbox"/> 1, 2-Dichlorobenzene | <input type="checkbox"/> PCB-1221 (Arochlor 1221) |
| <input type="checkbox"/> Ethylbenzene | <input type="checkbox"/> 1, 3-Dichlorobenzene | <input type="checkbox"/> PCB-1232 (Arochlor 1232) |
| <input type="checkbox"/> Methyl bromide | <input type="checkbox"/> 1, 4-Dichlorobenzene | <input type="checkbox"/> PCB-1248 (Arochlor 1248) |
| <input type="checkbox"/> Methyl chloride | <input type="checkbox"/> 3, 3-Dichlorobenzidene | <input type="checkbox"/> PCB-1260 (Arochlor 1260) |
| <input type="checkbox"/> Methylene chloride | <input type="checkbox"/> Diethyl phthalate | <input type="checkbox"/> PCB-1016 (Arochlor 1016) |
| <input type="checkbox"/> 1,1 ,2 ,2-Tetrachloroethane | <input type="checkbox"/> Dimethyl phthalate | <input type="checkbox"/> Toxaphene |
| <input type="checkbox"/> Tetrachloroethylene | <input type="checkbox"/> Di-n-butyl phthalate | |
| <input type="checkbox"/> Toulene | <input type="checkbox"/> 2, 4-Dinitrotoluene | <input type="checkbox"/> Antimony |
| <input type="checkbox"/> 1,2-trans-dichloroethylene | <input type="checkbox"/> 2, 6-Dinitrotoluene | <input type="checkbox"/> Arsenic |
| <input type="checkbox"/> 1, 1 ,1-Trichloroethane | <input type="checkbox"/> Di-n-octyl phthalate | <input type="checkbox"/> Beryllium |
| <input type="checkbox"/> 1, 1, 2-Trichloroethane | <input type="checkbox"/> 1, 2-Diphenylhydrazine | <input type="checkbox"/> Cadmium |
| <input type="checkbox"/> Trichloroethylene | <input type="checkbox"/> Fluoranthene | <input type="checkbox"/> Chromium |
| <input type="checkbox"/> Vinyl chloride | <input type="checkbox"/> Fluorene | <input checked="" type="checkbox"/> Copper* |
| | <input type="checkbox"/> Hexachlorobenzene | <input type="checkbox"/> Lead |
| <input type="checkbox"/> 2-Chlorophenol | <input type="checkbox"/> Hexachlorobutadiene | <input type="checkbox"/> Mercury |
| <input type="checkbox"/> 2, 4-Dichlorophenol | <input type="checkbox"/> Hexachlorocyclopentadiene | <input checked="" type="checkbox"/> Nickel** |
| <input type="checkbox"/> 2, 4-Dimethylphenol | <input type="checkbox"/> Hexachloroethane | <input type="checkbox"/> Selenium |
| <input type="checkbox"/> 4, 6-Dinitro-o-Cresol | <input type="checkbox"/> Indeno (1, 2, 3-cd) pyrene | <input type="checkbox"/> Silver |
| <input type="checkbox"/> 2, 4-Dinitrophenol | <input type="checkbox"/> Isophorone | <input type="checkbox"/> Thallium |
| <input type="checkbox"/> 2- Nitrophenol | <input type="checkbox"/> Naphthalene | <input type="checkbox"/> Zinc |
| <input type="checkbox"/> 4- Nitrophenol | <input type="checkbox"/> Nitrobenzene | <input type="checkbox"/> Total Cyanides |
| <input type="checkbox"/> P-chloro-m-cresol | <input type="checkbox"/> N-Nitrosodimethylamine | <input type="checkbox"/> Total Phenols |
| <input type="checkbox"/> Pentachlorophenol | <input type="checkbox"/> N-Nitrosodi-n-propylamine | |
| <input type="checkbox"/> Phenol | <input type="checkbox"/> N-Nitrosodiphenylamine | <input type="checkbox"/> Chromium (Hexavalent) |
| <input type="checkbox"/> 2, 4, 6-Trichlorophenol | <input type="checkbox"/> Phenanthrene | <input type="checkbox"/> Radioactive nuclides |
| | <input type="checkbox"/> Pyrene | <input type="checkbox"/> Diazinon |
| <input type="checkbox"/> Acenaphthene | <input type="checkbox"/> 1, 2, 4-Trichlorobenzene | <input type="checkbox"/> chlorpyrifos |
| <input type="checkbox"/> Acenaphthylene | | <input type="checkbox"/> Xylenes |
| <input type="checkbox"/> Anthracene | <input type="checkbox"/> Aldrin | |
| <input type="checkbox"/> Benzidene | <input type="checkbox"/> Alpha-BHC | |

*Cupric Oxide

**Nickel Nitrate

A-2 P

ATTACHMENT 3

Indicate below all treatment processes that are at your facility. Include diagrams and schematics if not previously submitted to Little Rock Wastewater Utility.

- Air Flotation
- Centrifuge
- Chemical precipitation
- Chlorination
- Cyclone
- Filtration
- Flow equalization
- Grease or oil separation, type
- Grease trap
- Grinding filter
- Grit removal
- Ion exchange
- Neutralization, pH correction
- Ozonation
- Reverse osmosis
- Screen
- Sedimentation
- Septic tank
- Solvent separation
- Spill protection
- Sump
- Biological treatment, type:
- Rainwater diversion or storage
- Other chemical treatment, type: _____
- Other physical treatment, type: _____
- Other, type: _____

- There is no pretreatment conducted at this facility

Give details on controls and operations of pretreatment equipment used at your facility:

In general, no pretreatment of the process wastewater takes place other than some settling that takes
place within the secondary holding tank. Sanitary wastewater is pretreated through a primary septic
tank prior to discharge the secondary holding tank. Plans and schematics associated with the discharge
were submitted in October 2007 with the initial permit application.

Attachment A-3

Little Rock Wastewater Guidelines for Liquid Waste Disposal at the AFTP Disposal Station

1. The Liquid Waste Transporter (Transporter) is not to start disposal of truck contents until an Operator is present and the contents are approved by that Operator. This allows Little Rock Wastewater the opportunity to collect samples for testing.
2. All loads disposed of at the Adams Field Disposal Station must have a Liquid Waste Manifest Form that is accurately completed. The blank Liquid Waste Manifest Forms are available for pickup at the Receptionist's Office located in the Administration Building.

The Transporter must ensure that the owner of the waste completes the "Generator Information" and the transporter correctly completes "Transporter Information" on the Liquid Waste Manifest Form. The Operator must complete the Disposal Information before the transporter leaves the site. The original copy of the completed manifest will be provided to the Transporter.

3. Hauled Liquid Waste loads will only be accepted from 8:00 a.m. through 4:00 p.m. Monday through Friday. The only exceptions will be in the event of an emergency. During an emergency the Transporter should call the Operations Department prior to delivering a load at 688-1525.
4. Transporter must wear a hard hat on site and follow all LRW safety regulations. If an employee of the Transporter has never been to the AFTP Disposal Station, the individual is required to stop at the Administration Building for a short overview with the on-duty Operator on the hazards associated with the treatment plant.
5. Transporter must clean up area of disposal before leaving.
6. Payment for Disposal.

Fees for Permits are listed in the 2012 Consolidated Fee Schedule

Domestic Septic Tank Waste - At time of disposal, the Transporter must provide a Disposal Ticket. The Disposal Ticket may be purchased from the AFTP receptionist. Payment of tickets must be with a check or money order. **Cash will not be accepted and payment must be made prior to discharge.**

Landfill/Portable Toilet/Other - The total volume of liquid waste disposed in one month's time will be calculated based on the information "Gallons Removed" provided on the Liquid Waste Manifest. This total will be provided to the Little Rock Wastewater's Finance and Accounting Division for monthly billing.

8. Little Rock Wastewater may refuse any hauled liquid at any time if any of the above items are not met.
9. Little Rock Wastewater will accept only the following types of domestic waste for disposal at the AFTP Disposal Station:
 - Household Septic Tank Waste

- Portable Toilet Waste
 - Domestic septic tank waste from commercial establishments located within the City of Little Rock sewer system service area (Approval must be requested prior to disposal)
 - Landfill Leachate (Approval must be requested prior to disposal)
10. Little Rock Wastewater will not accept the following types of waste without approval Permits/Authorization documents outlined in the Consolidated Fee Schedule:
- Industrial Waste from any source
 - Grease trap/interceptor waste from any source
 - Domestic septic tank waste from commercial establishments located outside the City of Little Rock sewer system service area
 - Treatment Plant Waste Activated Sludge
11. Transporters must act in accordance with the rules and regulations of the Arkansas Department of Health (ADH) regarding the transport of septic tank waste. If a license is required by ADH, the Transporter must be able to provide proof of such license at any time when requested by Little Rock Wastewater.
12. The Transporter must submit a Material Safety Data Sheet for each chemical used in the operations of transporting domestic waste to Little Rock Wastewater.
13. The Transporter must abide by all applicable provisions of the City of Little Rock's Pretreatment Ordinance #19,895 and specifically to Section 3.4 Hauled Wastewater.
14. When vehicle is on Little Rock Wastewater, the Transporter must follow the speed limit (15 MPH) posted upon plant entry.
15. Liquid waste discharges that cause ANY problems with the operation of the treatment plant may result in revocation of approval to discharge for the transporter.

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HAULED LIQUID WASTE MANIFEST

No. 21625

GENERATOR INFORMATION			
Generator Name (Please Print):		Address:	
Contact Person:		City:	AR Zip Code
Daytime Telephone No. (Include Area Code):		County:	
Home Telephone No. (Include Area Code):		Tank Capacity: _____ gallons	
Waste Removed From:	One Family Residential Septic Tank	Landfill Leachate**	
	Commercial Holding/Septic Tank*	WAS/Aerobic Sludge*	
	Portable Toilet/Chemical Toilet*	Other*	
If Other, Please Describe Type and Source:			
* Generators are required to have prior approval by Little Rock Wastewater (LRW) before disposal is accepted.			
** The Landfill Leachate Generator must be permitted under the LRW Pretreatment Program.			
<i>As representative for the generator of this waste, I certify that the information provided above is true and correct and contains no industrial waste. I am aware that falsification of this information may result in revocation of disposal privileges and/or criminal prosecution</i>			
Date and Time of Service:			
Generator Signature / Date:			

TRANSPORTER INFORMATION			
Transporter Name:		Address:	
Driver's Name (Please Print):		City:	AR Zip Code
Telephone No. (Include Area Code):			
Vehicle No.:	License No./Expiration Date:		/
Truck Tank Size:	_____ gallons		
<i>I certify that the information provided above is true and correct, and contains no industrial waste. I am aware that falsification of this information may result in revocation of disposal privileges and/or criminal prosecution.</i>			
Date and Time Waste Transported:			
Driver's Signature / Date:			

DISPOSAL INFORMATION			
Business Name: Little Rock Wastewater - Adams Field Treatment Plant Disposal Station			
Address: 1001 Temple Street, Little Rock AR 72202		Telephone No. (501)688-1525	
Gallons Accepted from Transporter:		_____ gallons (Enter Truck Tank Size)	
Received Date / Time:			
Operator's Signature / Date:			
Operator's Printed Name:			
Comments Regarding Discharge:			

**POLICY FOR ACCEPTING PETROLEUM CONTAMINATED WATERS TO
THE SANITARY SEWER**

DRAFT REVISIONS

The purpose of this policy is to set forth guidelines to be used by Little Rock Wastewater (LRW) in accepting gasoline or diesel-contaminated waters from underground storage tanks (UST), contaminated rainwater surrounding those tanks, and groundwater from site remediation. LRW will only accept those waters from locations within Little Rock City limits or the LRW service area provided the criteria listed below are met.

A. Short Term UST Projects

Short term UST projects are defined as those projects which remediate water which is contaminated with materials such as but are not limited to gasoline and/or diesel fuel. The duration of the project shall last no more than a period of one (1) week and generate 4,999 gallons or less water for disposal.

1. LRW will require a flash point test and a one time BTEX analysis for gasoline contaminated waters and a one time naphthalene analysis for diesel-contaminated waters. Samples shall be collected in such a way to assure the results of the testing are representative of the true level of contamination.
2. Contaminated waters may only be disposed of by transporting to the Adams Field Liquid Disposal Station. Connections to the sanitary sewer will not be approved for remediation of gasoline contaminated water. Payment in advance is required.
3. In no instance will LRW accept contaminated waters at LRW's Adams Field Liquid Waste Disposal Station with BTEX or naphthalene levels over 100 µg/L.
4. A site inspection must be performed by Pretreatment Inspectors and results of testing must be submitted before any waters will be allowed transported to the Adams Field Liquid Waste Disposal Station.
5. The charge for disposal of contaminated waters will be \$.0.20/gallon and the volume of water will be determined by the size of the tanker used to transport the water, e.g., if a tanker capacity is rated for 1,000 gallon, then the cost would be 1,000 x \$0.20.
6. All short term UST projects must comply with the provisions set forth in the City of Little Rock's Pretreatment Ordinance #19,895 and General Ordinance #17,965.

B. Medium Term UST Projects

Medium term UST projects are defined as those projects which remediate water which is contaminated with materials such as but are not limited to gasoline and/or diesel fuel. The duration of the project shall be greater than one (1) week but no longer than one (1) month and generate 5000 gallons or more water for disposal.

1. The minimum testing requirement will be weekly for flash point, BTEX and/or naphthalene. LRW may also require a Total Toxic Organic scan or other analysis on the contaminated waters. Determination of the TTO scan requirement will be based upon an on-site inspection. Samples shall be collected in such a way to assure the results of testing are representative of the level of contamination.
2. Contaminated waters may only be disposed of by transporting to the Adams Field Liquid Disposal Station. Connections to the sanitary sewer will not be approved for remediation of gasoline contaminated water. Payment in advance is required.
3. In no instance will LRW accept contaminated waters at our Adams Field Disposal Station with BTEX or naphthalene levels over 20 µg/L. Pretreatment may be necessary to achieve the 20 µg/L limit.
4. A site inspection must be performed by Pretreatment Inspectors and results of testing must be submitted before any waters will be allowed transported to the Adams Field Liquid Waste Disposal Station.
5. The charge for disposal of contaminated waters will be \$.020/gallon and the volume of water will be determined by the size of the tanker used to transport the water, e.g., if a tanker capacity is rated for 1,000 gallon, then the cost would be 1,000 x \$.020.
6. All medium term UST projects must comply with the provisions set forth in the City of Little Rock's Pretreatment Ordinance #19,895 and General Ordinance #17,965.

C. Long Term UST Projects

Long term UST projects are defined as those projects which remediate water which is contaminated with materials such as but are not limited to gasoline and/or diesel fuel. The duration of the project shall be greater than one (1) month and generate 5000 gallons or more water for disposal.

1. Initial testing of untreated groundwater shall be performed to develop a baseline monitoring report for pollutants of concern and will include the following parameters:

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- Organic compounds listed in 40 Code of Federal Regulation (CFR) Part 122 Appendix D Table II - Volatiles, Base/Neutrals, Acid Compounds, and Pesticides;
 - The elements and compounds listed in 40 CFR Part 122 Appendix D Table III;
 - Oil and grease, flashpoint, pH, benzene, toluene, ethylbenzene and xylene (BTEX). (Benzene, toluene, and ethylbenzene are included in the list of volatile compounds from 40 CFR Part 122 Appendix D Table II, they need not be analyzed twice in one event but shall be used to calculate a total BTEX concentration along with independent reporting of the compound);
 - Representative samples must be collected and above analysis performed using EPA methods required by 40 CFR Part 136.
2. A summary shall be provided regarding the UST project to include the following:
- When and how the groundwater became contaminated and with what;
 - Any federal, state, or local actions that have been undertaken or are currently pending;
 - Copies of letters, memorandum, permits, and compliance/noncompliance records;
 - Current method of treatment being used;
3. A copy of the existing or proposed construction plans of the pretreatment system, how it is to be performed and by who;
- A Professional Engineer registered by the State of Arkansas must evaluate the pretreatment devices planned or currently in place. A report, certified by the engineer, must state whether the pretreatment devices currently in place or planned are adequate to comply with the 443 Subpart C New Source Pretreatment Standards, and Ordinance 19,895 requirements, including local limits.
4. The UST Project shall complete a Special Discharge Permit Application and return to LRW. LRW may issue a Special Discharge Permit, (Permit) for long term UST projects. This Permit will shall contain self monitoring requirements with discharge limits. The limits contained in the Permit will be determined based on the data provided in Items #1 through 3 of this section.
5. Contaminated waters may only be disposed of by transporting to the Adams Field Liquid Disposal Station. In no instance will LRW accept contaminated waters at our Adams Field Disposal Station with BTEX or naphthalene levels over 20 µg/L. Payment in advance is required.
5. A site inspection must be performed Pretreatment Inspectors and results of testing must be submitted before any waters will be allowed transported to the Adams Field Liquid Waste Disposal Station.

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7. The charge for disposal of contaminated waters will be \$.020/gallon and the volume of water will be determined by the size of the tanker used to transport the water, e.g., if a tanker capacity is rated for 1,000 gallon, then the cost would be 1,000 x \$.020.
8. All long term UST projects must comply with the provisions set forth in the City of Little Rock's Pretreatment Ordinance #19,895 and General Ordinance #17,965.

The above policy is tentative and may be modified at any time without notice, for any reason to protect the interests of Little Rock Wastewater. If you have any questions or would like to contact the Utility about a site inspection prior to disposal, please contact the Pretreatment Supervisor at (501) 688-1495 or 688-1532.

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Attachment A-5

INSTRUCTIONS FOR COMPLETING THE INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION FORM

Note: All items in the Industrial Wastewater Discharge Permit Application Form must be completed. Failure to submit a complete application could result in a delay in the renewal or issuance of your permit.

Section A - General Facility Information

1. Provide official legal name of your company and the local facility name if applicable.
2. List the local facility address where mail is received.
3. List the physical location of the local facility (street address).
4. List the main telephone and fax number(s) of the local facility and an emergency or after hours telephone number(s) where someone representing the local facility can be reached.
5. Print the names of those persons authorized to represent the local facility and their titles. A primary and Secondary contact must be listed.
6. Print the name and title of the signatory authority for the local facility. Definitions of signatory authority can be found under Section H of the Industrial Wastewater Discharge Permit Application Form.
7. If the local facility has district or area office, list the complete mailing address, telephone number, fax number, and contact person at the district/area office.
8. If the local facility has corporate office, list the complete mailing address, telephone number, fax number, and contact person at the corporate office.
9. List the name of the top CEO responsible at the highest level of the company structure. Provide the complete mailing address, telephone, and fax numbers.
10. List all Standard Industrial Classification (SIC) Codes for this company or facility. If you have questions regarding SIC Codes, please contact the Environmental Assessment Department of Little Rock Wastewater Utility for assistance.
11. Indicate environmental permits held by this company or facility (YES or NO). If yes, list the permit reference number. Environmental permits will include your Little Rock Wastewater Utility Industrial Discharge Permit and may include permits issued by Arkansas Department of Environmental Quality and/or the U.S. Environmental Protection Agency (EPA) for air, water (National Pollutant Discharge Elimination System - NPDES), stormwater (NPDES), solid waste, hazardous waste (Resource Conservation and Recovery Act - RCRA), incinerators, or other environmental permits.

Section B - Water Use Information

1. List all Little Rock Municipal Water Works account numbers for this facility. These account numbers will be found on your monthly water and sewer bills.
2. Indicate whether all water used at this company or facility comes from Little Rock Municipal Water Works (YES or NO). If NO, please list the source(s) of additional water, such as wells, reservoirs, etc., and the average daily use from these sources.
3. Indicate whether all process water at this company or facility is discharged to the sanitary sewer (YES or NO). If NO, please indicate how the additional water is disposed of or used.
4. Indicate whether this facility receives a diversion credit for waters which are not discharged to sanitary sewer (YES or NO). If YES, you must list all meters by serial number, size, and average use in gallons per day. If you have any questions about diversions or diversion credits, please contact the Environmental Assessment Department at Little Rock Wastewater Utility.

Section C - Facility Operating Characteristics

1. List the days and hours of normal operation of this company and facility, e.g. Monday - Friday, 8:00 a.m. - 4:30 p.m.
2. List the start times and stop times of each shift, the number of employees, and primary functions conducted during that shift.
3. Indicate whether production is subject to seasonal variation (YES or NO). If YES, describe the seasonal variation, listing months of high and/or low production.
Indicate any time(s) of the year when this company or facility is not in operation other than weekends or normal holidays (YES or NO). If YES, list the time(s) of the year as specifically as possible when this company or facility is shut down or otherwise not in operation.

Section D - Process Information

1. List all major products, and/or services provided by this company. Products include the end product of the manufacturing or fabrication processes. Services can include inspection, repair, etc.
2. List all processes conducted at this facility. Processes include the major steps involved in production of the end product. Review and complete Attachment 1 for identifying federal regulated processes.
3. List all raw materials used at this facility in the production processes.
4. List all sources of wastewater generation at this facility in regard to the process(es) listed in item #1.
5. Indicate whether any new processes have been added at this facility (YES or NO) since the last Industrial Wastewater Discharge Permit Application Form. If YES, explain.
6. Indicate whether any hazardous waste is discharged to the Sanitary Sewer (City of Little Rock Ordinance 19,895; Section 6.10.).

Section E - Chemical Inventory Information

1. If this is a new application, provide a complete list of all chemicals used at the facility. Also, provide a copy of the manufacturer's MSDS. or (B) If you are renewing an existing discharge permit, indicate if there have been any changes to the facility chemical inventory since a previous permit application? (YES or NO) For both A and B above, cross reference the Material Safety Data Sheets (MSDS) of chemicals used at the applicant facility against the pollutant list on Attachment 2. If a pollutant on the list is contained in any of your process chemicals or is stored at the facility please indicate on the attachment and return with this application. Submit a copy of all MSDS or a complete chemical listing for chemicals used or stored at this facility if not previously submitted to Little Rock Wastewater Utility.
2. Indicate (YES or NO) if the facility has a Spill Control Plan. If NO, submit a plan of action for procedures, policies, and mechanism, that controls and prevents spills or slug discharges from entering the sanitary sewer (City of Little Rock Ordinance 19,895; Article, Section 5.2, B.3).
3. Indicate any changes in the facility Spill Control Plan. If YES, explain and attach any pertinent information about the changes, such as diagrams, plans, etc.

Section F - Wastewater Treatment

1. Describe any wastewater treatment processes conducted at this facility prior to the discharge of the water to the sanitary sewer. Attach a copy of the most current plans and diagrams. If no treatment processes are conducted, indicate "not applicable". Review and complete the Attachment 3 check list of treatment processes.
2. If Industrial Wastewater Discharge Permit Application Form is for permit renewal indicate (YES or NO) whether any new treatment equipment has been added. If YES, explain and attach diagrams, plans, and other pertinent information on the new equipment.
3. Indicate whether any of the treatment processes listed in item #1 above (YES or NO) result in the generation of a solid waste. If YES, indicate how those solids are disposed.
4. List other policies or procedures used to prevent discharge of pollutants.
5. List all flow meters measuring wastewater flow and explain how the accuracy of these flow meter(s) is maintained.
6. Report the average monthly wastewater discharge to the sanitary sewer. Little Rock Water Works reports the water consumption to you in 100 cubic feet. There are 748 gallons per 100 cubic feet of water. If there are no diversions then water discharged will equal water consumption.

Section G - Freedom of Information

This section describes procedures to use if any of the information you submit to Little Rock Wastewater Utility in respect to this Industrial Wastewater Discharge Permit Application Form may be considered trade secrets or proprietary information. If you believe that any of the information contained in your permit application should be considered confidential, please follow the instructions provided in the application under this section.

Section H - Certification and Signature

**Instructions For Completing The
Industrial Wastewater Discharge Permit Application Form**

**Form No.: IPP-02
Page 3 of 3**

Section H of the Industrial Wastewater Discharge Permit Application Form lists three (3) categories of individuals who are considered authorized representatives. This Industrial Wastewater Discharge Permit Application Form must be signed by an authorized representative of the company or facility as defined by EPA Regulation 40 CFR 403. Any signature other than that of an authorized representative will cause this Industrial Wastewater Discharge Permit Application Form to be considered incomplete and may cause a delay in the issuance of the Industrial Wastewater Discharge Permit.

**LITTLE ROCK WASTEWATER UTILITY
ENVIRONMENTAL ASSESSMENT DIVISION
INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION FORM**

- CHECK ONE: Permit Renewal Application. Applicant currently holds a discharge permit issued by Little Rock Wastewater Utility.
- New Industry Application. Applicant proposes to discharge industrial wastewater to the sanitary sewer or is currently discharging but does not hold a discharge permit.

Note: Facility submitted discharge application in October 2007, Permit is pending approval of final connection

Section A - General Facility Information

1. A. Company Name: Porocel Industries, LLC
- B. Local Facility Name if Applicable: _____
- Check here if No. 1 (B) is not applicable
2. Local Facility Mailing Address: 10300 Arch Street Pike, Little Rock, AR 72206
3. Location of Local Facility (if different from above): _____
4. Local Facility Telephone No.: (501) 888-1357 Fax No. (501) 888-8692
- Emergency or After Hours Telephone #(s): _____
5. Name and title of person(s) authorized to represent your firm or company in official capacity in dealings with Little Rock Wastewater Utility (both primary and secondary contacts).
- Primary Contact: Gerald Ashford Title: Plant Manager
- Secondary Contact: Kenny Doyle Title: Quality and Environmental System
Coordinator
6. Signatory Authority (see Section H of this application).
- Name: Gerald Ashford Title: Plant Manager
7. If the local facility has district or area office, list the complete mailing address, telephone number, fax number, and contact person at the district/area office.
- Check here if No. 7 is not applicable
- _____

8. If the local facility has corporate office, list the complete mailing address, telephone number, fax number, and contact person at the corporate office.
- Check here if No. 8 is not applicable
- _____

9. Provide the name of top corporate, Chief Executive Officer. Provide the complete mailing address, telephone, and fax numbers.

Bill Kist - Chief Financial Officer

10300 Arch Street Pike, Little Rock, Arkansas 72206

(501) 888-1357 (telephone) (501) 888-8692

10. List all Standard Industrial Classification Numbers (SIC Codes) for this facility:

2819				
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11. List below all, if any, Environmental Permits currently held by the applicant facility. Name the issuing agency and list permit number(s):

A. Little Rock Wastewater Utility Industrial Wastewater Discharge Permit #: YES, NO

N-71

B. Arkansas Department of Pollution Control and Ecology RCRA Permit #: YES, NO

ARD006337240

C. Arkansas Department of Pollution Control and Ecology Stormwater Permit #: YES, NO

ARR00A087

D. Arkansas Department of Pollution Control and Ecology Air Permit #: YES, NO

0635-AR-10

E. Arkansas Department of Pollution Control and Ecology Incinerator Permit #: YES, NO

F. Other Environmental Permits (if yes, list type of permit, issuing agency, and permit number):

Section B - Water Use Information

1. List all Little Rock Municipal Water Works Account Numbers for this facility:

507-2101-300				
--------------	--	--	--	--

Monthly Total Consumption: 68,938.6 cu. ft.

2. Does all water used at this facility come from Little Rock Municipal Water Works? YES, NO

If NO, please list the source(s) of additional water and average daily usage:

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3. Is all process water discharged to the sanitary sewer? YES, NO

If NO, how is the additional water used or disposed of (i.e., water into product, cooling tower evaporation, boiler makeup water, discharge to storm drain, etc.)?

The facility processes result in a large amount of evaporation, particularly during the hot summer months

4. Does this facility receive a diversion credit for waters that are not discharged to the sanitary sewer? YES, NO

If YES, list all meters below:

Serial # _____ Size: _____ Average Discharge or Use (gallons per day) _____

Serial # _____ Size: _____ Average Discharge or Use (gallons per day) _____

Serial # _____ Size: _____ Average Discharge or Use (gallons per day) _____

Serial # _____ Size: _____ Average Discharge or Use (gallons per day) _____

Section C - Facility Operating Characteristics

1. List the days and hours of normal operation for this facility: 24 hrs/7 days a week

2. List the times of each shift, the average number of employees per shift, and indicate whether the shift is primarily production, maintenance, cleanup, administrative, and/or other (please explain):

1st Shift Start Time: 6 am Stop Time: 6 pm Number of Employees: approx. 18

Primary Function(s) Production

2nd Shift Start Time: 6 pm Stop Time: 6 am Number of Employees: approx. 17

Primary Function(s) Production

3rd Shift Start Time: _____ Stop Time: _____ Number of Employees: _____

Primary Function(s) _____

3. Is production subject to seasonal variation? YES, NO. If YES, describe:

4. Are there any times during the year (other than normal holidays or weekends) that this facility is not in operation? YES, NO. If YES, describe:

ASg

Section D - Process Information

1. List all major products, and/or services provided by this company or facility (attach additional sheets if necessary).

Industrial dry absorbents, industrial catalysts

2. List and describe all processes conducted at this facility. Review Attachment 1 to this application and check any Federal categorical listed process (40 CFR 400 series) which are performed at this facility and return the attachment with this application.

Porocel Industries, LLC processes various metallic and non-metallic minerals and products for use in the absorbent and catalyst industry. Operations at the facility encompass alumina tri-hydrates, activated alumina, bentonite, Fuller's Earth, and others. See attached process description

3. List all raw materials used at this facility in the production process(es) (attach additional sheets if necessary):

Alumina tri-hydrate, activated alumina, bentonite, Fuller's Earth

4. List all major sources of wastewater generation at this company or facility related to the process(es) described in item #1 above (i.e., milk production - equipment and floor cleaning water, copper plating - alkaline and acid cleaning rinse water) (attach additional sheets if necessary):

Discharge from Tri-Mer NOx Scrubber, reverse osmosis system and water softener reject,

sanitary wastewater

5. Have any new production processes been added at this facility since the last application for a discharge permit? YES, NO. If YES, explain:

- 6. Does this facility discharge to the Sanitary Sewer (in process waste or otherwise) any substance, which, if otherwise disposed of would be considered a hazardous waste as defined in 40 CFR 261?

YES, NO. If YES, explain:

Section E - Chemical Inventory Information:

- 1. (A) If this is a new application, provide a complete list of all chemicals used at the facility. Also, provide a copy of the manufacturer's MSDS, or (B) If you are renewing an existing discharge permit, have there been any changes in this facility's chemical inventory since a previous permit application? YES, NO N/A. For both A and B above, cross reference the Material Safety Data Sheets (MSDS) of chemicals used at the applicant facility against the pollutant list on Attachment 2. If a pollutant on the list is contained in any of your process chemicals or is stored at the facility please indicate on the attachment and return with this application. Submit a copy of all MSDS or a complete chemical listing for chemicals used or stored at this facility if not previously submitted to Little Rock Wastewater Utility. **Submitted with previous application**

- 2. Does this facility have a Spill Control Plan to submit with this application or has already submitted to the Utility? YES NO. If NO, submit a plan of action for addressing procedures, policies, mechanism, that controls and prevents spills or slugs discharges from entering the sanitary sewer. The City of Little Rock Ordinance 15,344, Article VI, Section 10, requires an approved "Spill Control Plan" before discharging to the sanitary sewer. **See attached revised Spill Control Plan**

- 3. Have there been any changes to this facility's Spill Control Plan since the last permit application? YES, NO. If YES, please explain below and attach any revisions to your plan to this permit application.

Revised plan attached

Section F - Wastewater Treatment

- 1. Describe all wastewater treatment processes conducted at this facility prior to discharge to the sanitary sewer (attach additional sheets if necessary). Complete Attachment 3 of the application to check the pretreatment processes conducted at this facility:

The sanitary wastewater is treated through the primary septic tank and then discharged to the secondary holding tank prior to discharge to the city. The scrubber discharge, RO and water softener reject is discharged directly to the secondary holding tank where some settling takes place prior to the discharge to the city.

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2. Has any new wastewater treatment equipment, including sand traps, oil/water separators, grease traps, solids traps, or flow equalization equipment been added since the previous permit renewal application? YES, NO. If YES, explain and attach diagrams, plans, etc. to this renewal application.

3. Do any of the treatment processes utilized by this facility result in the generation of a solid waste? YES, NO. If YES, please indicate how these solids are disposed. For grease, sand, oil, and solids traps, list the cleaning frequency and person or company that removes the solids and/or oil.

Sludge produced in the septic tank is periodically pumped out by a licensed sewer sludge pumper and disposed of properly. Significant amounts of solids are not generated from the process wastewater discharge. However, the secondary tank is checked routinely to ensure that solids do not accumulate within the tank. Solids removed from the tank are disposed of by an approved solid waste landfill.

4. Describe pollution prevention policies or procedures utilized by your facility that controls discharges of pollutants into the sanitary sewer system:

The only connection to the city sewer system is at the secondary holding tank. The discharge from the scrubber and the RO/water softener reject water are the only processes with connections to the holding tank. There are no drains within the active portions of the plant. The restrooms are located in an area separate from the active plant and are connected directly to the primary septic tank which discharges into the secondary holding tank.

5. List all flow meters used to measure discharge of wastewater through and/or from treatment processes including total flow measurements. NA

Name and Model # Accuron Model 7100 Serial # 12792 Size 6-inches

Name and Model # _____ Serial # _____ Size: _____

6. Average monthly volume of wastewater discharge to the sanitary sewer _____ Design Flow - (15,100 gpd) 2018.9 cu. ft (Process Wastewater - 14,400 gpd, Sanitary Wastewater - 700 gpd). the actual average flow recorded during 2010 was 5,585 gpd. However, the discharge flow is expected to increase during 2011 due to increased production.

Section G - Freedom of Information

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City of Little Rock Ordinance 19,895 and EPA Regulation 40 CFR 403 requires that the information contained in this application be available for public inspection without reservation. Exceptions are made for trade secrets or proprietary information. If any of the material contained in this application can be considered a trade secret or proprietary business information, it must have the words "**CONFIDENTIAL BUSINESS INFORMATION**" on the applicable pages and the information must be submitted on separate pages. If the material can be considered confidential, it will be filed separately in a locking file cabinet. If the information cannot be considered confidential, notification will be given within ten (10) days of receipt stating the reason(s) the information cannot be held confidential.

Section H - Certification and Signature

This application is to be signed by an authorized official of the facility after completion of the permit application and review of the information contained in the application.

Authorized officials are defined by EPA Regulation 40 CFR 403 as follows:

1. A responsible corporate officer, if the facility is a corporation
 - a. A president, secretary, treasurer, or vice-president of the corporation in charge of a principle business function, or any other person who performs similar policy- or decision-making functions for the corporation.
 - b. The manager of one or more manufacturing, production, or operation facilities provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
2. A general partner or proprietor if the facility is a partnership or sole proprietorship respectively.
3. A duly authorized representative of the individuals listed in items 1 or 2 above if:
 - a. The authorization has been made in writing by any of the individuals listed in items 1 or 2 above; and
 - b. The authorization specifies either an individual or a position having responsibility for the overall operation of the facility, such as a plant manager, superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the facility; and
 - c. The written authorization has been submitted to Little Rock Wastewater Utility.

The authorized official of the facility shall make the following certification statement:

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

Attested By:

Gerald Ashford, Plant Manager

Name and Title (Please Type or Print)

Gerald Clehford
Signature

5/18/11
Date

For Little Rock Wastewater Office Use Only:

Permit Application Received by: H. Jeff Davis Date: 5-23-11

Initial Review Conducted by: H. Jeff Davis Date: 6-2-11

Jeff Davis, Pretreatment Supervisor
 Mikel Murders, Pretreatment Supervisor

Comments: Metallic minerals covered in Permit? Nickel, Arsenic, Copper, + zinc limits needed? Settling tanks cleaned? Frequency? Discharge to secondary not primary - clarify.

Facility Inspection Conducted by: Tony Roll Date: 6/21/2011

Industrial Inspector: Allen Gatlin, Paul Foster, Tony Roll, Cornelius Jones

Comments: NOT ALL METALS COVERED. SUGGEST WE ADD HEXAVALENT CHROMIUM, ARSENIC, NICKEL, COPPER, AND TPS EVERY PERMIT CYCLE. SETTLING TANKS LAST CLEANED 2010 - COLLECTIONS TO BAG HOUSES HAVE LIT DOWN ON SOLIDS IN DISCHARGE. "SECONDARY HOLDING TANK" IS PRIVATE PUMP STATION.

Pretreatment Supervisor Review: _____ Date: _____
Mikel Murders

Comments: _____

Pretreatment Supervisor Review: H. Jeff Davis Date: 6-29-11
 Jeff Davis

Comments: Permit renewed 7-1-11
Add: Ar, Cr, Copper, Ni. local limits

A-5m

ATTACHMENT 1

If your facility employs or will be employing processes in any of the business activities below (regardless of whether they generate wastewater, waste sludge, or hazardous waste), place a check beside the category or business activity (check all that apply).

Industrial Categories*

- | | |
|---|--|
| <input type="checkbox"/> Aluminum Forming | <input type="checkbox"/> Nonferrous Metals Manufacturing |
| <input type="checkbox"/> Asbestos Manufacturing | <input type="checkbox"/> Organic Chemicals Manufacturing |
| <input type="checkbox"/> Battery Manufacturing | <input type="checkbox"/> Paint and Ink Formulating |
| <input type="checkbox"/> Builders Paper and board Mills | <input type="checkbox"/> Paving and Roofing Manufacturing |
| <input type="checkbox"/> Carbon Black Mfg. | <input type="checkbox"/> Pesticides Manufacturing |
| <input type="checkbox"/> Coal Mining | <input type="checkbox"/> Petroleum Refining |
| <input type="checkbox"/> Coil Coating | <input type="checkbox"/> Pharmaceutical |
| <input type="checkbox"/> Copper Forming | <input type="checkbox"/> Plastic and Synthetic Materials Manufacturing |
| <input type="checkbox"/> Electric and Electronic Components Mfg | <input type="checkbox"/> Plastics Processing Manufacturing |
| <input type="checkbox"/> Electroplating | <input type="checkbox"/> Porcelain Enamel |
| <input type="checkbox"/> Feedlots | <input type="checkbox"/> Pulp, Paper, and Fiberboard Manufacturing |
| <input type="checkbox"/> Fertilizer Manufacturing | <input type="checkbox"/> Rubber |
| <input type="checkbox"/> Foundries (Metal Molding and Casting) | <input type="checkbox"/> Soap and Detergent Manufacturing |
| <input type="checkbox"/> Glass Manufacturing | <input type="checkbox"/> Steam Electric |
| <input type="checkbox"/> Grain Mills | <input type="checkbox"/> Sugar Processing |
| <input type="checkbox"/> Inorganic Chemicals | <input type="checkbox"/> Textile Mills |
| <input type="checkbox"/> Iron and Steel | <input type="checkbox"/> Timber Products |
| <input type="checkbox"/> Leather Tanning and Finishing | <input type="checkbox"/> Transportation Equipment Cleaning |
| <input type="checkbox"/> Metal Finishing | <input type="checkbox"/> Pesticide Formulating and Packaging |
| <input type="checkbox"/> Nonferrous Metals Forming | <input type="checkbox"/> Landfills |
| <input type="checkbox"/> Centralized Waste Treatment | |

Other Category Guidelines Under Development

- Metal Products and Machinery
- Meat Products
- Industrial Container and Drum Cleaners

* A facility with processes inclusive to these categories may be subject to discharge pretreatment standards listed in the Code of Federal Regulations. If you are not sure if your process is regulated by a category listed above review the Code of Federal Regulations. Contact the Little Rock Wastewater Utility Industrial Pretreatment Coordinator if further assistance is needed.

Describe below all processes at your facility that would be regulated under a category listed above:

Check here if none of the above categories apply to your facility

A-5N

ATTACHMENT 2

By review of Material Data Safety Sheets and inventory of chemicals at your facility indicate by checking below those that are present at your facility.

- | | | |
|--|--|---|
| <input type="checkbox"/> Acrolein | <input type="checkbox"/> Benzo (a) anthracene | <input type="checkbox"/> Beta-BCH |
| <input type="checkbox"/> Acrylonitrile | <input type="checkbox"/> Benzo (a) pyrene | <input type="checkbox"/> Gamma-BHC |
| <input type="checkbox"/> Benzene | <input type="checkbox"/> 3,4-Benzofluoranthene | <input type="checkbox"/> Delta-BHC |
| <input type="checkbox"/> Bromoform | <input type="checkbox"/> Benzo (ghi) perylene | <input type="checkbox"/> Chlorodane |
| <input type="checkbox"/> Carbon tetrachloride | <input type="checkbox"/> Benzo (k) fluoroanthene | <input type="checkbox"/> 4, 4-DDT |
| <input type="checkbox"/> Chlorobenzene | <input type="checkbox"/> Bis (2-Chloroethoxyl) methane | <input type="checkbox"/> 4, 4-DDE |
| <input type="checkbox"/> Chlorodibromomethane | <input type="checkbox"/> Bis (2-Chloroethyl) ether | <input type="checkbox"/> 4, 4-DDD |
| <input type="checkbox"/> Chloroethane | <input type="checkbox"/> Bis (2-Chloroisopropyl) ether | <input type="checkbox"/> Dieldrin |
| <input type="checkbox"/> 2-Chloroethyl vinyl ether | <input type="checkbox"/> Bis (2-Ethylhexyl) phthalate | <input type="checkbox"/> Endosulfan-sulfate |
| <input type="checkbox"/> Chloroform | <input type="checkbox"/> 4-Bromophenyl phenyl ether | <input type="checkbox"/> Endrin |
| <input type="checkbox"/> Dichlorobromomethane | <input type="checkbox"/> Butylbenzyl phthalate | <input type="checkbox"/> Endrin aldenhyde |
| <input type="checkbox"/> 1, 1-Dichloroethane | <input type="checkbox"/> 2-Chloronaphthalene | <input type="checkbox"/> Heptachlor |
| <input type="checkbox"/> 1, 2-Dichloroethane | <input type="checkbox"/> 2-Chlorophenyl phenyl ether | <input type="checkbox"/> Heptachlor epoxide |
| <input type="checkbox"/> 1, 1-Dichloroethylenc | <input type="checkbox"/> Chrysene | <input type="checkbox"/> PCB-1242 (Arochlor 1242) |
| <input type="checkbox"/> 1, 2- Dichloropropane | <input type="checkbox"/> Dibenzo (a,h) anthracene | <input type="checkbox"/> PCB-1254 (Arochlor 1254) |
| <input type="checkbox"/> 1, 3 - Dichloropropylene | <input type="checkbox"/> 1, 2-Dichlorobenzene | <input type="checkbox"/> PCB-1221 (Arochlor 1221) |
| <input type="checkbox"/> Ethylbenzene | <input type="checkbox"/> 1, 3-Dichlorobenzene | <input type="checkbox"/> PCB-1232 (Arochlor 1232) |
| <input type="checkbox"/> Methyl bromide | <input type="checkbox"/> 1, 4-Dichlorobenzene | <input type="checkbox"/> PCB-1248 (Arochlor 1248) |
| <input type="checkbox"/> Methyl chloride | <input type="checkbox"/> 3, 3-Dichlorobenzidene | <input type="checkbox"/> PCB-1260 (Arochlor 1260) |
| <input type="checkbox"/> Methylene chloride | <input type="checkbox"/> Diethyl phthalate | <input type="checkbox"/> PCB-1016 (Arochlor 1016) |
| <input type="checkbox"/> 1,1 ,2 ,2-Tetrachloroethane | <input type="checkbox"/> Dimethyl phthalate | <input type="checkbox"/> Toxaphene |
| <input type="checkbox"/> Tetrachloroethylene | <input type="checkbox"/> Di-n-butyl phthalate | |
| <input type="checkbox"/> Toulene | <input type="checkbox"/> 2, 4-Dinitrololuene | <input type="checkbox"/> Antimony |
| <input type="checkbox"/> 1,2-trans-dichloroethylene | <input type="checkbox"/> 2, 6-Dinitrotoluene | <input type="checkbox"/> Arsenic |
| <input type="checkbox"/> 1, 1 ,1-Trichloroethane | <input type="checkbox"/> Di-n-octyl phthalate | <input type="checkbox"/> Beryllium |
| <input type="checkbox"/> 1, 1, 2-Trichloroethane | <input type="checkbox"/> 1, 2-Diphenylhydrazine | <input type="checkbox"/> Cadmium |
| <input type="checkbox"/> Trichloroethylene | <input type="checkbox"/> Fluoranthene | <input type="checkbox"/> Chromium |
| <input type="checkbox"/> Vinyl chloride | <input type="checkbox"/> Fluorene | <input checked="" type="checkbox"/> Copper* |
| | <input type="checkbox"/> Hexachlorobenzene | <input type="checkbox"/> Lead |
| <input type="checkbox"/> 2-Chlorophenol | <input type="checkbox"/> Hexachlorobutadiene | <input type="checkbox"/> Mercury |
| <input type="checkbox"/> 2, 4-Dichlorophenol | <input type="checkbox"/> Hexachlorocyclopentadiene | <input checked="" type="checkbox"/> Nickel** |
| <input type="checkbox"/> 2, 4-Dimethylphenol | <input type="checkbox"/> Hexachloroethane | <input type="checkbox"/> Selenium |
| <input type="checkbox"/> 4, 6-Dinitro-o-Cresol | <input type="checkbox"/> Indeno (1, 2, 3-cd) pyrene | <input type="checkbox"/> Silver |
| <input type="checkbox"/> 2, 4-Dinitrophenol | <input type="checkbox"/> Isophorone | <input type="checkbox"/> Thallium |
| <input type="checkbox"/> 2- Nitrophenol | <input type="checkbox"/> Naphthalene | <input type="checkbox"/> Zinc |
| <input type="checkbox"/> 4- Nitrophenol | <input type="checkbox"/> Nitrobenzene | <input type="checkbox"/> Total Cyanides |
| <input type="checkbox"/> P-chloro-m-cresol | <input type="checkbox"/> N-Nitrosodimethylamine | <input type="checkbox"/> Total Phenols |
| <input type="checkbox"/> Pentachlorophenol | <input type="checkbox"/> N-Nitrosodi-n-propylamine | |
| <input type="checkbox"/> Phenol | <input type="checkbox"/> N-Nitrosodiphenylamine | <input type="checkbox"/> Chromium (Hexavalent) |
| <input type="checkbox"/> 2, 4, 6-Trichlorophenol | <input type="checkbox"/> Phenanthrene | <input type="checkbox"/> Radioactive nuclides |
| | <input type="checkbox"/> Pyrene | <input type="checkbox"/> Diazinon |
| <input type="checkbox"/> Acenaphthene | <input type="checkbox"/> 1, 2, 4-Trichlorobenzene | <input type="checkbox"/> chlorpyrifos |
| <input type="checkbox"/> Acenaphthylene | | <input type="checkbox"/> Xylenes |
| <input type="checkbox"/> Anthracene | <input type="checkbox"/> Aldrin | |
| <input type="checkbox"/> Benzidene | <input type="checkbox"/> Alpha-BHC | |

*Cupric Oxide

**Nickel Nitrate

ATTACHMENT 3

Indicate below all treatment processes that are at your facility. Include diagrams and schematics if not previously submitted to Little Rock Wastewater Utility.

- Air Flotation
 - Centrifuge
 - Chemical precipitation
 - Chlorination
 - Cyclone
 - Filtration
 - Flow equalization
 - Grease or oil separation, type
 - Grease trap
 - Grinding filter
 - Grit removal
 - Ion exchange
 - Neutralization, pH correction
 - Ozonation
 - Reverse osmosis
 - Screen
 - Sedimentation
 - Septic tank
 - Solvent separation
 - Spill protection
 - Sump
 - Biological treatment, type:
 - Rainwater diversion or storage
 - Other chemical treatment, type: _____
 - Other physical treatment, type: _____
 - Other, type: _____
- There is no pretreatment conducted at this facility

Give details on controls and operations of pretreatment equipment used at your facility:

In general, no pretreatment of the process wastewater takes place other than some settling that takes
place within the secondary holding tank. Sanitary wastewater is pretreated through a primary septic
tank prior to discharge the secondary holding tank. Plans and schematics associated with the discharge
were submitted in October 2007 with the initial permit application.

A-5 p

Attachment A-6



CERTIFIED MAIL - RETURN RECEIPT REQUESTED
(Article No. 7010 0290 0002 1895 3027)

June 30, 2011

Mr. Gerald Ashford, Plant Manager
Porocel Corporation
10300 Arch Street Pike
Little Rock, AR 72206

Subject: INDUSTRIAL WASTEWATER DISCHARGE PERMIT S-83

Dear Mr. Ashford:

Little Rock Wastewater (LRW) has completed the review process of the Permit Application, and has completed an inspection at Porocel Corporation located at 10300 Arch Street Pike. All items have met LRW approval and enclosed with this letter is the Industrial Wastewater Discharge Permit for Porocel Corporation. This permit will be in effect for two (2) years at which time you will be required to reapply. LRW will prompt you to reapply at least ninety (90) days prior to the permit expiration date.

The USEPA regulations require that local control authorities notify industrial users that there are identification and disposal requirements for hazardous waste. Part III L of Industrial Wastewater Discharge Permit S-83 states Porocel Corporation 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 (40CFR403.8(f)(2)(iii)). For further instruction on hazardous waste disposal contact the ADEQ Hazardous Waste Division at 682-0833.

Please review all items in Permit S-83. Part I.A lists effluent limitations for metals that may be present at your facility. If there are any questions please contact Tony Roll at (501) 688-1529, or me at (501) 688-1547.

Sincerely,

LITTLE ROCK WASTEWATER

A handwritten signature in black ink that reads "Jeff Davis".

Jeff Davis, Pretreatment Supervisor
Environmental Assessment Division

cc: Porocel Corporation Permit File

**LITTLE ROCK WASTEWATER
INDUSTRIAL WASTEWATER DISCHARGE PERMIT FACT SHEET**

Industry Name: Porocel Corporation

Mailing Address: 10300 Arch Street Pike
Little Rock, AR 72206

Facility Location: 10300 Arch Street Pike
Little Rock, AR 72206

Contact Person: Gerald Ashford
Title: Plant Manager
Telephone Number: (501) 888-1357
Emergency Number: (501) 519-5175
Other Contact(s): Kenny Doyle, Quality and Environmental System Coordinator

Signatory Authority: Gerald Ashford
Title: Plant Manager

Parent Company: Porocel Corporation
CEO: Bill Kist, Chief Financial Officer
Mailing Address: 10300 Arch Street Pike
Little Rock, AR 72206
Telephone Number: (501) 888-1357

Environmental Permits Held:

1. LRW Industrial Wastewater Discharge Permit # S-83
2. ADEQ Stormwater Permit # ARR-00A087
3. ADEQ RCRA # ARD 006337240
4. ADEQ Air Permit # 0635-AR-10

Porocel Corporation is engaged in the industrial dry absorbents and industrial catalysts production. Standard Industrial Classification is 2819. Major processes at the facility include the following:

1. Raw material receiving and screening,
2. Hammer mill crushing,
3. Kiln calcinations,
4. Alumina milling,
5. Impregnation and toll calcining,
6. Bagging and shipping.

Industrial wastewater generation at the facility includes discharges from Tri-Mer NOx air scrubber, reverse osmosis and water softener reject. Industrial process wastewater is

LITTLE ROCK WASTEWATER
INDUSTRIAL WASTEWATER DISCHARGE PERMIT
POROCEL CORPORATION

approved for discharge to the sanitary sewer collection system in accordance to requirements of Permit S-83.

Porocel Corporation is classified as a Significant Industrial User by Little Rock Wastewater due to storage and processing of minerals (metals) that may have an impact on the POTW operations. Total wastewater discharge flow is approximately 15,000 gallons per day. Total flow wastewater discharge to the sanitary sewer is subject to extra strength surcharges for Biological Oxygen Demand/Chemical Oxygen Demand, Total Suspended Solids and Oil & Grease above domestic back ground levels in accordance with City of Little Rock Sewer Rate Ordinance.

The facility is located at 10300 Arch Street Pike, and discharges total flow wastewater to a private sampling inspection manhole, private pump station and sewer meter to a private manhole (9T-043) and into the Little Rock Wastewater collection system at Map Page 9S, Manhole # 2. This discharge is designated as outfall 01 for this facility.

Outfall 01 from Porocel Corporation flows to the Geyer Springs Collector and on to the Jamison Pump Station, the District 210 outfall and into the LRW 54" main and into the Arch Street Pump Station. The wastewater flow then proceeds via a 42" force main to the College Station Pump Station, then to the Fourche Creek Wastewater Treatment Plant through the 42" main.

Discharge travel times to the Fourche Creek Wastewater Treatment Plant are presented below:

Average facility discharge rate: 15,000 gallons per day

- Four (4) hours six (6) minutes travel time based on a high flow condition in the Little Rock Wastewater collection system.
- Nine (9) hours eight (8) minutes travel time based on a low flow condition in the Little Rock Wastewater collection system.

The information on travel time of industrial wastewater discharges from the above facility is presented to demonstrate the need for prompt reporting of spills, slug loads, or violations of pretreatment standards as addressed in Part II. Section D. of this permit. Failure to promptly report spills, slug loads, or effluent violations as required by the permit will result in LRW seeking enforcement action against the facility.

Porocel Corporation has submitted a Spill/Slug Control Plan that has been approved on May 27, 2009 and on file with LRW. The enclosed Permit S-83 Part II Section A requires that Porocel Corporation adheres to the requirements and conditions of the Plan.

The information included in this fact sheet has been obtained from the industrial users' permit renewal application, historical data, Little Rock Wastewater data, and information taken during inspections. This information has been used in preparing the attached industrial discharge permit for the facility listed above.

LITTLE ROCK WASTEWATER
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NUMBER: S-83

AUTHORIZATION TO DISCHARGE INDUSTRIAL PROCESS WASTEWATER
FLOW TO LITTLE ROCK WASTEWATER

In accordance with the provisions of City of Little Rock's General Ordinance 17,965, and Pretreatment Ordinance 19,895, Environmental Protection Agency Regulation 40 CFR 403 (General Pretreatment Regulations), and any applicable provisions of Federal or State of Arkansas Law, the following facility,

Porocel Corporation
10300 Arch Street Pike
Little Rock, AR 72206

is authorized to discharge industrial process wastewater to the City of Little Rock Sanitary Sewer System as described below:

Outfall 01 – Total flow wastewater effluent into Little Rock Wastewater collection system, map page 9S, manhole # 02.

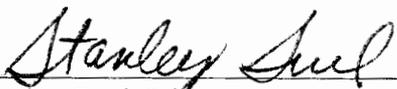
All discharges must be in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, and III hereof.

This permit is granted in accordance with the application filed on May 23, 2011 with the Environmental Assessment Division of Little Rock Wastewater, and in conformity with plans, specifications, and/or other data submitted in support of the application.

This permit shall become effective on July 1, 2011.

This permit and the authorization to discharge shall expire on midnight, June 30, 2013.

Signed this 30th day of June, 2011



Stanley Suel, Director
Environmental Assessment Division
Little Rock Wastewater

A-6.d

PART I
 PERMIT REQUIREMENTS

SECTION A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS: OUTFALL 01 - Discharge to Little Rock Wastewater at map page 9S, manhole number 02. The sampling inspection manhole for outfall 01 is located just prior to the private pump station at the truck entrance on the north side of the plant in a chain link fenced area.

During the period beginning on the effective date of this permit and lasting through the date of expiration, the permittee is authorized to discharge from outfall 01 - Samples taken in compliance with the monitoring requirements specified below shall be taken at the following location(s): Total flow sampling inspection manhole located just prior to the private pump station. Such discharge shall be limited and monitored by the permittee as specified below (see notes 1 and 2 below):

Effluent Characteristics	Discharge Limitations		Monitoring Requirements	
	Monthly Average	Daily Max	Measurement Frequency	Sample Type
Flow ³	Report Only	Report Only	Daily	Totalized Meter
pH		≥5.0 S.U. and ≤ 12.0 S.U.	2/Year ⁴	Grab ⁵
Arsenic (Total)	0.14 mg/L	0.14mg/L	2/Year ⁴	Composite ⁴
Chromium (Total)	5.0 mg/L	5.0 mg/L	2/Year ⁴	Composite ⁴
Copper (Total)	5.0 mg/L	5.0 mg/L	2/Year ⁴	Composite ⁴
Mercury (Total)	0.002 mg/L	0.002 mg/L	2/Year ⁴	Composite ⁴
Nickel (Total)	4.9 mg/L	5.0 mg/L	2/Year ⁴	Composite ⁴
Zinc (Total)	4.8 mg/L	5.0 mg/L	2/Year ⁴	Composite ⁴

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Notes:

1. All sampling and analysis conducted to fulfill the requirements under this section shall be conducted during normal work cycles.
2. All samples analyzed to fulfill the requirements must be performed in accordance with the latest approved method listed in 40 CFR, Part 136. If performed by an outside laboratory (or contract laboratory) shall be performed by a laboratory certified for that analysis by the Arkansas Department of Environmental Quality in accordance with the latest approved methods in 40 CFR Part 136. If an approved method is not contained in 40 CFR Part 136, contact Little Rock Wastewater (LRW) for method selection guidance.
3. Flow will be obtained from Little Rock Wastewater's Finance and Accounting Division based on water consumption for billing purposes unless this facility utilizes a sewer meter. In which case the sewer meter reading will be reported to Little Rock Wastewater according to part II Section D (7) of this permit. The average daily flow (gpd) will be calculated based on either water consumption or sewer meter totalizer readings.
4. Little Rock Wastewater will monitor the facility discharge for compliance in accordance with 40 CFR part 403.12 (h) a minimum of twice per year for pollutants "reasonably expected to be present". Sampling for metals shall be four-part composite at a minimum.

SECTION B. SCHEDULE OF COMPLIANCE

The permittee shall achieve compliance with the effluent limitations specified in Section I.A. of this permit in accordance to the following schedule.

Compliance with effluent limitations is required on the effective date of the permit.

PART II - GENERAL CONDITIONS

SECTION A - SPILL AND SLUG CONTROL

The permittee shall adhere to the accidental spill prevention plan submitted to LRW. Emergency Notification signs shall be posted where indicated in the plan (City of Little Rock's Pretreatment Use Ordinance 19,895 Section 3.3). See Attachment No. 1 the end of this permit for notification procedures.

SECTION B - BYPASS PROHIBITED

Bypass means the intentional diversion of wastestreams from any portion of an Industrial User's treatment facility (40CFR 403.17(a)(1)). Bypass notification and prohibition provisions are listed below:

1. If, for any reason, the permittee knows in advance that a bypass of treatment system operations will occur, the permittee shall notify LRW, if possible, at least ten (10) days before the anticipated bypass.
2. If the bypass is not anticipated, the permittee shall notify LRW orally within 24 hours of becoming aware of the bypass (40 CFR 403.17).
3. Within five (5) days of the permittee becoming aware of any bypass, the permittee shall submit a written report to LRW describing the bypass, its cause, duration, including exact dates and times (or, if it has not been corrected, how long it is expected to continue), and the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass. LRW may waive the written report on a case by case basis if the oral report has been received within 24 hours (40 CFR 403.17).
4. Bypass is prohibited. LRW may take enforcement action against the permittee for a bypass unless:
 - A. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage or no feasible alternative exists (40 CFR 403.17).
 - B. There is no feasible alternative to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal period of equipment downtime.
 - C. The permittee submitted notices as required under Section B.1-3 above.
5. LRW may approve an anticipated bypass, after considering its adverse effects, if LRW determines it will meet the three conditions listed in paragraph B.4.

The permittee may allow any bypass to occur which does not cause permit limits or requirements to be violated, but only if it is for essential maintenance to assure efficient operation. Controlled bypass for essential maintenance that do not cause violations of limits or requirements are not subject to the provisions listed above.

SECTION C - OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

The permittee shall continuously maintain any effluent treatment devices or systems in satisfactory operating condition in accordance with the City of Little Rock's Pretreatment Ordinance 19,895, Sections 3.1-3.3. Maintenance and calibrating records for these devices or systems shall be retained and available for inspection.

Sewer meters or other effluent flow measurement devices used for reporting flow shall be calibrated and maintained to insure the accuracy of the measurements are within the maximum deviation of less than $\pm 10\%$ from the discharge rates. The permittee shall have the effluent flow meter checked and/or calibrated a minimum of once per year by a factory trained representative and retain on file proof of this check or calibration.

Abg

SECTION D - REPORTING REQUIREMENTS

1. The permittee shall notify LRW **IMMEDIATELY** of any accidental spill, slug discharge, or upset of the wastewater pretreatment system. A slug discharge includes a spill, upset, or any non-routine discharge which could cause a violation of Part IA discharge limitations or a violation of prohibited discharge standards (listed in Industrial Wastewater Discharge Permit Part III Standard Conditions, item N). The notification shall include the location of the discharge, type of waste, concentration and volume of the waste, and corrective actions taken. The notification shall be made in accordance to the Notification Procedures in Attachment No. 1 of this permit. Attachment No. 1 (or facsimile thereof) is suitable for posting at locations as necessary to ensure that appropriate personnel are aware of the notification procedures required by Little Rock Wastewater and this permit.
2. Within five (5) days of the initial notification of item 1 above, the permittee will submit a detailed written report describing the cause and its impact on the permittee's compliance status; the duration and extent of the noncompliance, including quantities and concentrations, dates and times of the noncompliance, and if the noncompliance is continuing, when compliance is expected to occur, and all steps taken or to be taken to prevent reoccurrence (City of Little Rock's Pretreatment Ordinance 19,895, Section 6.7).
3. The permittee shall notify LRW 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 Utility approval before changes occur.
4. The permittee shall submit monitoring reports for the parameters requiring self monitoring listed in Part I, Section A of this Permit. All monitoring reports are due by the last day of the month following the month in which the sample is collected. If the permittee monitors any pollutant more frequently than required by Part I, Section A of this Permit, the results of such monitoring must be included in the reports required by this Permit (40CFR403.12.g.5).
5. The permittee shall notify LRW of any violations of the pretreatment standards specified in Part I, Section A of this Permit. If sampling performed by the permittee indicates a violation, the permittee shall notify the Environmental Assessment Division by telephone within 24 hours of becoming aware of the violation (40CFR403.12.g.2).
6. Recording of Results.
For each measurement or sample taken pursuant to the requirements of this permit, the User shall record the following information:
 - A. The exact place, date, and time of sampling or measurement;
 - B. The person(s) doing the sampling or measurement;
 - C. The dates and time the analyses were performed;
 - D. The person(s) who performed the analyses;
 - E. The preservation methods used if applicable;
 - F. The analytical techniques or methods used; and
 - G. The results of all required analyses.
7. All written reports required by this permit will be submitted to the following address:

Little Rock Wastewater
Environmental Assessment Division
1001 Temple Street
Little Rock, AR 72202
Attn.: Pretreatment Supervisor

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8. Sewer Metering

- A. Reporting - If the permittee has a sewer meter, the permittee shall submit the sewer meter readings for billing by the fifth (5th) day of each month. The permittee shall use the Sewer Meter Reporting Form supplied by LRW. All sewer meter reports shall be sent to the address listed below.

Little Rock Wastewater
Environmental Assessment Division
1001 Temple Street
Little Rock, AR 72202
Attn.: Pretreatment Supervisor

- B. Modifications to Existing Installations- The permittee shall notify the Environmental Assessment Division in writing and obtain approval prior to making any modifications to sewer meter, including pipe changes, new meter installations, new flow monitoring equipment, or meter change outs.

9. Diversion Metering

- A. Reporting - The permittee shall report diversion meter readings by the fifth (5th) day of each month to receive credit for waters that are not discharged to the sanitary sewer. The permittee shall use the Diversion Meter Reporting Form supplied by LRW. All diversion meter reports shall be sent to the address listed below:

Little Rock Wastewater
Finance and Administration Division
PO Box 45090
Little Rock, AR 72214
Attn: Finance and Administration

- B. Modification to Existing Installations - The permittee shall notify the Environmental Assessment Division in writing and shall obtain approval prior to making any modifications to diversion metering, including piping changes, new meter installations, or meter change outs.

SECTION E - ADDITIONAL CHARGES AND FEES

The permittee may be subject to additional sewer charges as provided for in the City of Little Rock's Sewer Rate Ordinance No. 19,647 and any future amendments thereto. Further, the Manager of the Little Rock Wastewater Utility may collect fees under the City of Little Rock's Pretreatment Ordinance No. 19,895.

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PART III - STANDARD CONDITIONS

- A. The permittee shall comply with all provisions of the City of Little Rock's General Ordinance 17,965 and Pretreatment Ordinance 19,895.
- B. Rights of Entry - The permittee shall allow duly authorized representatives of LRW bearing proper credentials and identification to enter the premises at reasonable hours for the purpose of inspecting, sampling, or records inspection. Reasonable hours are considered anytime the Permittee is operating any process that results in the discharge of wastewater to the sanitary sewer (City of Little Rock's Pretreatment Ordinance 19,895, Section 7.1).
- C. 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 (40CFR403.12 (o)).
- D. 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 Section 1 of this permit (City of Little Rock's Pretreatment Ordinance 19,895, Section 2.6).
- E. Signatory Requirements - All reports required by this permit shall be signed by the highest ranking executive officer who maintains an office at the facility, or his designee. Where the signatory responsibilities have been delegated, a letter signed by the highest ranking executive officer stating that this responsibility has been delegated and to whom it has been delegated must be submitted to LRW (40CFR403.12(m)).
- F. Nontransferability - 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 LRW.
- G. Permit Modification
 - 1. The terms and conditions of this permit are subject to modification by LRW at any time in response to changes in the City of Little Rock's General Ordinance 17,965 or Pretreatment Ordinance 19,895, 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.
 - 2. Any permit modifications which result in new conditions or limitations will include a reasonable time schedule for compliance, if necessary.
- H. Permit Revocation - This permit may be revoked by LRW if it is determined that the permittee has violated any provision of this permit, City of Little Rock's General Ordinance 17,965 and Pretreatment Ordinance 19,895, State of Arkansas regulations, or EPA regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any report required by this permit shall be cause for permit revocation.
- I. Penalties - Failure to resolve any violation of this permit, City of Little Rock's General Ordinance 17,965 or Pretreatment 19,895, State of Arkansas regulation, or EPA regulation may result in LRW seeking administrative, civil, or criminal fines and penalties in an amount not to exceed \$1000.00 per violation as outlined in the City of Little Rock's General Ordinance 17,965, Section 9 and Pretreatment Ordinance 19,895 Sections 10 and 11. In the case of monthly or other long term average discharge limits, fines shall be assessed for each day during the period of violation. Each day of a continuing violation shall be deemed a separate violation.
- J. 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 circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

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- K. 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.
- L. 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 (40CFR403.8(f)(2)(vii)).
- M. Confidentiality - All reports and data related to the requirements of this permit shall be available for public inspection at the Little Rock Wastewater, 11 Clearwater Drive except for that information that is deemed confidential in accordance with the provision of the City of Little Rock's Pretreatment Ordinance 19,895 Section 8.
- N. Prohibited Discharge Standards
1. General Prohibitions. No user shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes pass through or interference or in any way contaminates the POTW biosolids, scum, or residues to such a level as to render them unacceptable for economical reuse or reclamation. These general prohibitions apply to all users of the POTW whether or not they are subject to categorical pretreatment standards or any other National, State, or local pretreatment standards or requirements.
 2. Specific Prohibitions. No user shall introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:
 - 2.1 Liquids, solids, or gases which by reason of their nature and quantity are, or may be, sufficient either alone or by interaction with other substances to cause a fire or explosion hazard or be injurious in any other way to the POTW or the operation of the POTW. Such materials include, but are not limited to, gasoline, diesel, benzene, naphtha, fuel oils, kerosene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, or sulfides, or any wastestream with a closed cup flash point of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;
 - 2.2 Water or wastes having a pH lower than 5.0 S.U. or greater than 12.0 S.U. or having any other corrosive property capable of causing damage or a hazard to the structures, equipment, and personnel of the POTW. In no case shall waters or wastes be discharged at such a flow rate and/or pH which will cause the influent at the POTW treatment plant to be lower than 6.0 S.U. or greater than 9.0 S.U.;
 - 2.3 Solid or viscous substances in quantities or of such size capable of creating a stoppage, plugging, breakage, or any reduction in sewer capacity or any other damage to the POTW such as, but not limited to, commercial food services oil and grease, ashes, cinders, sand, plastic, wood, un-ground garbage, whole blood, hair and fleshings, entrails, and paper dishes, cups, milk containers, etc. Any additional sewer or sewerage maintenance expenses caused by such a discharge, or any other expenses attributable thereto will be charged to the User by LRW. Any refusal to pay the additional maintenance expense duly authorized by the CEO shall constitute a violation of the provisions contained herein;
 - 2.4 Pollutants, including oxygen-demanding pollutants (BOD, COD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference, upset, or loss of efficiency at POTW. In no case shall a slug load have a flow rate or contain a concentration or quantity of pollutants that exceed for any time period longer than fifteen (15) minutes more than five (5) times the average twenty-four (24) hour concentration, quantity, or flow during normal operation of the discharger;

- 2.5 Waters, wastes, or vapors discharged at such a volume and/or temperature which will inhibit biological activity in the treatment plant resulting in interference, but in no case any such waters or wastes which will cause the POTW influent or pumping station wetwell temperature to exceed 104°F (40.0°C). Any liquid or vapor having a temperature higher than 130° F (54.4° C) at the point of discharge;
- 2.6 Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass through;
- 2.7 Waters or wastes containing toxic or poisonous solids, liquids, or gases, or oxygen demanding wastes, in sufficient quantity, either singly or by interaction with other wastes to injure or cause interference with any sewage treatment process, to contaminate the POTW sludges, scum, or residue to such a level to render them unacceptable for economical reuse or reclamation, to pass through the POTW and cause a violation of the POTW's NPDES Permit or create a toxic effect in the receiving stream, to cause a public nuisance, or to constitute a hazard or an acute health or safety problem to the POTW workers or the public;
- 2.8 Noxious or malodorous liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or a hazard to life, or to prevent entry into the sewers for maintenance or repair;
- 2.9 Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating LRW's NPDES permit;
- 2.10 Unusual concentrations of inert suspended solids such as, but not limited to, Fuller earth, lime slurries and lime residues, or dissolved solids such as, but not limited to, sodium chloride and sodium sulfate.
- 2.11 Wastewater containing any radioactive wastes or isotopes except in compliance with applicable State or Federal regulations;
- 2.12 Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, de-ionized water, non-contact cooling water, and unpolluted wastewater, unless specifically authorized by the Manager;
- 2.13 Sludges, screenings, or other residues from the pretreatment of industrial wastes;
- 2.14 Medical wastes, no discharge of "any pharmaceutical medications, prescription or 'over the counter', unused or expired";
- 2.15 Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail a toxicity test;
- 2.16 Detergents, surfactant, or other substances which may cause excessive foaming in the POTW; or
- 2.17 Wastewater causing two successive readings on an explosion hazard meter at the point of discharge into the POTW, or at any point in the POTW, of more than 10% or any single reading over 20% of the Lower Explosive Limit of the meter.
- 2.18 Hauled or trucked liquid wastes, except at the specific discharge point(s) designated by LRW;

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Pollutants, substances, or wastewater prohibited by this section shall not be processed or stored in such a manner that they could be discharged to the POTW

O. National Categorical Pretreatment Standards

1. The categorical pretreatment standards found at 40 CFR Chapter I, Subchapter N, Parts 405-471 are hereby incorporated. Those standards, if more stringent than the limitations imposed by the latest approved "Technically Based Local Limits Development Document" for sources in that sub-category, shall supersede the limitations imposed by the Local Limits.
2. Where a categorical pretreatment standard is expressed only in terms of either the mass or the concentration of a pollutant in wastewater, the LRW CEO may impose equivalent concentration or mass limits in accordance with 40 CFR 403.6(c).
3. When wastewater subject to a categorical pretreatment standard is mixed with wastewater not regulated by the same standard, the LRW CEO shall impose an alternate limit using the combined wastestream formula in 40 CFR 403.6(e).

P. State Pretreatment Standards - State pretreatment standards located in Section 4 of Regulation No. 6 : Regulations for State Administration of the National Pollutant Discharge Elimination System for a particular industrial sub-category, if more stringent than the requirements of this Ordinance, shall supersede the requirements of this Ordinance, are hereby incorporated by reference and will be imposed where applicable and shall include, but is not limited to, discharge limitations and reporting requirements. This shall include those regulations currently promulgated or which will be promulgated in the future including any amendments, and shall be recognized as part of this Ordinance.

Q. Local Limits

1. No person shall discharge any waters or wastes at a concentration that would exceed the concentration of pollutants, including but not limited to, those identified in the "Technically Based Local Limits Development Document", and adopted by the CEO of the Little Rock Wastewater and approved by the Arkansas Department of Pollution Control and Ecology and the Little Rock Sanitary Sewer Committee.
2. LRW will develop and assign specific discharge permit limitations for pollutants for permitted users based on criteria approved by the CEO. The specific permit limits shall ensure that local limit pollutant concentrations will protect the wastewater treatment plant from upset. The Local Limits shall apply to the total flow or total discharge from the Industrial Users. In developing specific permit limits, the CEO may impose mass limitations in addition to, or in place of, specific concentration-based limits. In addition, LRW may develop specific discharge limitations for any other toxic pollutants which the CEO of LRW may determine to be of sufficient quantity to cause POTW interference and/or pass through, endanger the health and safety of the POTW personnel or the public health, cause a POTW permit violation or render the POTW sludges unacceptable for economic reuse or reclamation.

A-b.m

ATTACHMENT No. 1

LITTLE ROCK WASTEWATER

SPILL AND SLUG NOTIFICATION PROCEDURES

In the event of a spill or slug load that is discharged into the sanitary sewer from your facility, the following **IMMEDIATE NOTIFICATION** procedures listed below must be followed in accordance with City of Little Rock Pretreatment Use Ordinance 19,895 Section 6.7. A slug discharge includes a spill, upset, or any non-routine discharge which could cause a violation of Part I.A discharge limitations or a violation of prohibited discharge standards (listed in Industrial Wastewater Discharge Permit Part III Standard Conditions, item N).

To report a discharge occurrence dial the telephone number sequence listed below until contact is made.

For occurrences during normal working hours (7:30 a.m. to 4:00 p.m.)			For occurrences after normal working hours (4:00 p.m. to 7:30 a.m.), weekends and holidays.		
1.	Environmental Assessment Division (EAD) Pretreatment Supervisor	(501) 688-1547 (501) 688-1532 (501) 231-3024 (501) 681-3028	1.	Pretreatment Supervisor	(501) 231-3024 (501) 681-3028
2.	EAD Industrial Inspector	(501) 688-1528 (501) 688-1529 (501) 688-1527 (501) 688-1541	2.	After Hours EAD Emergency Beeper*	(501) 373-7953
3.	Fourche Creek WWTP	(501) 541-3559	3.	Fourche Creek WWTP	(501) 541-3559
4.	Adams Field WWTP	(501) 413-7381	4.	Adams Field WWTP	(501) 413-7381
5.	EAD Director	(501) 590-0932	5.	EAD Director	(501) 590-0932

* Emergency Beeper- Please carefully enter the return telephone number and an LRW staff member should contact you. If the LRW staff member has not made contact within 30 minutes - proceed with steps 3-5 until contact is made.

To assist you in reporting the necessary information, please have the following available:

- A. Date and time of the incident.
- B. The location of the incident (your plant name and address).
- C. The type of waste involved - try to be specific.
- D. The pollutant concentration - if known.
- E. The volume of the discharge.
- F. The duration of the discharge.
- G. Any corrective actions taken at your facility.

Display or post this Attachment in areas so that the notification procedures will be readily accessible. **Immediate Notification** allows LRW to assess the flow quantity, pollutants of concern, concentrations, and loading rates to make adjustment in the wastewater treatment system when necessary.

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LITTLE ROCK WASTEWATER ENVIRONMENTAL ASSESSMENT DIVISION INSPECTION REPORT

Facility Name:	Porocel Corporation
Facility Address:	10300 Arch Street Pike
Contact Person, Title:	Kenny Doyle, Quality and HSE Systems Coordinator
Phone No.:	501 888-1357
Date:	June 19, 2012
Subject:	Inspection Annual Compliance (I-AnComp)

Inspection Report

Summary

On June 19, 2012 Little Rock Wastewater (LRW) Environmental Assessment Division (EAD) inspected Porocel Corporation, 10300 Arch Street Pike. The inspection was conducted as the facility's Annual Compliance Inspection. Kenny Doyle, Quality and HSE Systems Coordinator acted as escort for the inspection. The facility appears to be in compliance with the requirements of Industrial Wastewater Discharge Permit #S-83 at the time of the inspection.

Porocel Corporation processes and mills various metallic and nonmetallic minerals and product materials for use as adsorbents and catalysts. Operations at the facility encompass alumina tri-hydrates, activated alumina, bentonite, fuller's earth, and other products. The primary source of process wastewater is from the Tri-Mer NO_x air scrubber system, Reverse Osmosis water system, and the laboratory.

Observations

PPE Required:	
Hard Hat	<input checked="" type="checkbox"/>
Safety Glasses	<input checked="" type="checkbox"/>
Hi-Vis Vest	<input checked="" type="checkbox"/>
Other:	<input checked="" type="checkbox"/>
Hearing Protection	

Chemical Storage

Chemicals are stored throughout the plant in areas where the chemical is used within the process of making the catalysts/adsorbents. Each of the chemicals is contained in large totes or tanks surrounded by a four (4) foot berm to prevent spills from going beyond the generalized area around the totes or tanks. There are no floor drains located near or in any of the areas where the chemicals are stored. A list of the chemicals are noted in the spill/slug control plan but include Acetic and Nitric acid, caustic soda, lime, Cupric Oxide, Potassium Nitrate, Sodium Hydrosulfide, and various chemicals requested by customers to be added to the product, such as Zinc Oxide, Arsenic, Nickel, and Hexavalent Chrome (dry flakes).

Tri-Mer NO_x Air Scrubber System

The primary source of wastewater discharged to the sanitary system, other than domestic waste, is from the Tri-Mer NO_x air scrubber system. It uses water from the reverse osmosis system to prevent the discharge of NO_x to the environment. The discharge of NO_x to the air is primarily caused from the use of Nitric acid in conjunction with metal refining and chemical nitration.

An exhaust vent is installed above the Calcination unit, removing all the dust from the process and runs this waste through a series of sock filters (bag house) to remove the solids content of the dust. The exhaust is then run through a series of scrubbing systems that remove NO_x and other salts that precipitate out in solution. The wastewater discharges into a tank and then passes through another sock filter before being discharged to the two (2) holding tanks. The bag house and sock filter after the Tri-Mer NO_x air scrubber system are checked each start of shift to verify no excessive solids are being discharged into the two holding tanks. The sock filter after the air scrubber system is changed out twice or three times a shift, depending on the product running as some products produce more solids than others. Sodium Hypochlorite (bleach) is no longer added to the system to neutralize the pH *after* scrubbing as it was determined that the pH of the solution neutralizes within limits with minimal addition of sodium hypochlorite *during* the scrubbing system (water in towers). Wastewater passing through the final sock filter and also in the holding tanks is tested daily to verify within pH limits stated in the Industrial Wastewater Discharge

Permit #S-83. Mr. Doyle has check sheets with the pH limits set one higher and lower to trigger notification of an issue with the system as needed (6.0 – 11.0 S.U. instead of 5.0 – 12.0 S.U.).

The two holding tanks are connected in series to act similar to a sand/oil interceptor to allow the settling of solids. Due to the volume of the tanks, they are currently only checked and reported quarterly for solids content. This procedure is in place primarily due to the NOV letter sent in December 2009 due to the discharge of excessive solids and zinc to the sanitary sewer. The zinc originates from the addition of zinc oxide to the process of making catalysts/absorbents for a specific customer. Porocel Corporation was not aware of how much the air scrubber system was picking up the powder and discharging to the holding tanks until after a bag house failure causing excessive solids to accumulate in the holding tanks.

During the inspection, the question was asked if any of the specialty products made could contamination occur with the Tri-Mer NO_x system; specifically, whether products utilizing Arsenic, Nickel, Copper, or Hexavalent Chrome could get into the Tri-Mer NO_x system discharge. Mr. Doyle advised that each process runs on different kiln systems and they each have their own bag houses. Whether dust could get transferred and possibly incorporated with exhaust cleansed by the Tri-Mer NO_x system, it could be possible. In recent months, bag houses throughout the plant have been changed with newer, more efficient bag houses to lessen dust / environmental concerns. Product requiring the Hexavalent Chrome is run in proximity to the Tri-Mer NO_x system; however, Porocel Corporation has enclosed the process to prevent further contamination of chrome in the discharge.

Laboratory

The lab conducts basic wet chemistry testing on the catalysts/absorbents each product run. One test is Porosimetry testing, which involves injecting liquid mercury into the catalysts/absorbents. Water used in this testing was the primary source of mercury in the wastewater testing conducted upon permitting the facility in June 2009. The septic tank where all wastewater from the lab discharges into became contaminated with mercury over the years and when the system was connected to the sanitary sewer, mercury violations resulted. An immediate corrective action to the mercury contamination was to segregate the water from discharge and dispose off-site as hazardous waste. Since that change in procedure, Porocel Corporation has now added a mercury recovery system to clean up the waste stream and allow discharge of the pretreated wastewater to the sanitary sewer. The recovery system is checked daily to verify the system is working properly and sock filters changed regularly.

Another test conducted is to verify catalysts/absorbents contain an appropriate amount of Hexavalent chrome. The Hexavalent chrome added to the catalysts/absorbents process is in dry, flake form and is not produced near a connection to the sanitary sewer. The testing does involve rinse water and that waste is disposed of as hazardous waste. Porocel disposes of approximately fifteen (15) to twenty (20) thousand pounds of chrome waste yearly.

Due to the proximity of the sinks in the lab, one could inadvertently dispose of liquid waste from testing in either sink (mercury waste sink / chrome waste sink). Because of this concern, chromium (6) was added to their permit.

Private Pump Station

The private pump station was inspected to verify no excessive solids are being discharged. No solids were noted in the inspection. Sewer meter reading was noted (1187640 gallons) and the meter was recently calibrated on 6/7/2012. Mr. Doyle advised that the private pump station is as well checked quarterly along with the holding tanks to verify no discharge of excessive solids. Mr. Doyle asked if this check of the private pump station could be eliminated. Permission was given to lessen the checking of the private pump station to only in instances where solids were found excessive in the two holding tanks.

Follow-Up

No actions are anticipated at this time. When permit S-83 was renewed in 2010, metals were added to the monitoring parameters in Part I to include Arsenic, Chromium, Copper, and Nickel in addition to Mercury and Zinc. Sampling results have returned with values exceeding detection limits; however, only one instance of a reading exceeding 1.0 mg/L was noted in the last year (Chromium 4.0 mg/L). This high chromium reading, although not a violation of local limits was forwarded to Mr. Doyle to investigate and resulted in the enclosure of the chromium kiln line to prevent contamination. All other results for any of the listed metals have been below 1.0 mg/L.

Type Originator's Name: Tony Roll, Industrial Inspector

Date Document Initiated: June 19, 2012

Originator's Signature:

Signature Date:

Select Routing Slip Sequence: One after another (Enter Order Below) or All at once ✓ Recipient's Name

Routing Sequence		Routing Recipient	Originator Requests Recipient to Comment, Sign, and/or Approve			Date Signed
#	Check		Comments Requested	Indicate Whether Signature(s) Are Required (The original will be I-O mailed for signature)		
1		Jeff Davis				
2		Mikel Murders				
3		Stanley Suel				

Comment No. 1: The scrubber final sock filters are changed out two-three times a shift and the primary's are checked each shift. Tony please provide insight to why it is more proficient to replace the final instead of the primary's? Also wouldn't heavy residuals on the final filters significant enough to require change outs indicated solids pass through to the in series collection tanks?

Select one of the following: Routed for Comment, Routed for Review Only, Not Routed

EAD Staff Member: Jeff Davis

Date: 6/20/12

Comment No. 1: No comment.

Select one of the following: Routed for Comment, Routed for Review Only, Not Routed

EAD Staff Member: Mikel Murders

Date: 6/20/12

Comment No. 1: - Select one of the following: Routed for Comment, Routed for Review Only, Not Routed

EAD Staff Member: Stanley Suel

Date:

File Original: Facility Correspondence File

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APPENDIX D

Sample Fact Sheet Template

Disclaimer

The U.S. Environmental Protection Agency (EPA), Office of Wastewater Management, Water Permits Division has prepared this sample fact sheet template for use by the Control Authority as a guide to developing its own fact sheets for use in the permitting process. The Control Authority may choose to develop its own fact sheet or use a modified version of the EPA fact sheet. If the Control Authority chooses to model its fact sheet on the sample, the Control Authority will want to tailor the sample fact sheet to reflect conditions at its publicly owned treatment works (POTW) and applicable state and local law requirements. As an aid to the Control Authority, the template contains blanks or brackets to identify areas that might need modification to reflect circumstances at the POTW. The sample fact sheet template has additional bracketed notes that explain issues the Control Authority should consider when developing fact sheets for use in its permitting process.

**APPENDIX D.
SAMPLE PERMIT FACT SHEET**

PERMIT FACT SHEET

[Enter Issuance Date, Renewal Date, or Amendment Date of permit]: [Today's Date]

[Note: The permit writer must modify the permit fact sheet to each specific industrial user to best suit its needs.]

A. INDUSTRIAL USER INFORMATION

[Name of Facility]
 [Facility Location Address]
 [City, Zip Code]

[Contact Person Name], [Title]
 [Telephone Number]

[Permit Number]

B. DESCRIPTION OF FACILITY OPERATIONS

[Name of Facility] is primarily engaged in the manufacturing of [Products] [SIC Code and/or NAICS Code].

[Describe the process unit operations conducted at the facility]

[Name of Facility] began operations began at the facility in [Date]. [Name of Facility] employs [Number of employee] personnel and operates [Number of days] per week.

C. SAMPLE POINT DESCRIPTION/FACILITY FLOW INFORMATION

INDUSTRIAL WASTEWATER PERMIT	SAMPLE POINT	FLOW PER OPERATIONAL DAY (GPD)		DESCRIPTION
		TOTAL	PROCESS	
[Number]	[Number]	[Flow]	[Flow]	[Describe sample point location along with expected pollutants discharged]
TOTAL		[Total flow]	[Total flow]	----

D. PROCESS UNIT OPERATION/FLOW INFORMATION

Process wastewater is generated from [*describe the process unit operations that generate industrial wastewater*].

The total amount of process wastewater generated from the above operations is [**Number of gallons**] gallons per day, based on [**Number of operational days**] operational days per week.

PERMIT NUMBER	SAMPLE POINT	PROCESS UNIT OPERATION CODE	PROCESS DESCRIPTION
[Number]	[Number]	[Code]	[Process description with a list of expected pollutants discharged]

E. DILUTION/AUXILIARY OPERATION/FLOW INFORMATION

[**Note: The permit writer should select one of the following applicable conditions:**

[For IUs without dilution wastestreams]

There are no dilution wastestreams that combine with process wastewater.

[For IUs with dilution wastestreams]

The dilution wastestreams are generated from [**Sources of dilution**]. The dilution wastestreams combine with the wastewater at Sample Point [**Sample point number**] prior to discharging to the City sewer. The total dilution flow is [**Total dilution flow in gallons**] gallons per day.

[**Note to permit writer: If there are dilution wastestreams combined with categorical wastewater prior to the sampling point, the combined wastestream formula must be used to calculate alternative categorical limits. Include sample calculations in Section O of the permit fact sheet.**]

F. FLOW MEASURING DEVICE

[Note: Flow measuring devices are required in certain circumstances. Please refer to the *Industrial User Permitting Guidance Manual* for more information. The permit writer should select one of the following applicable conditions]:

[For IUs that do not have and are not required to install an effluent flow meter]

[Name of Facility] does not have an effluent flow meter and is not required to install or maintain an effluent flow meter.

[For IUs that do not have but are required to install an effluent flow meter]

[Name of Facility] is required to install or maintain an effluent flow meter.

[For IUs with effluent flow meter]

[Name of Facility] has installed a [type and make of flow meter] flow meter to monitor the wastewater flow discharge to the sewer system.

G. PRETREATMENT UNIT OPERATIONS

[Describe the pretreatment system operations conducted at the facility]

H. POLLUTION PREVENTION / BEST MANAGEMENT PRACTICES

[Name of Facility] has implemented the following pollution prevention practice(s) and/or best management practice(s).

[Insert a description of all pollution prevention practices and /or best management practices]

I. RATIONALE FOR MONITORING LOCATIONS / SAMPLING POINTS

[Note: The permit writer should document its rationale for monitoring locations and sampling points. The documentation should include information regarding applicability for an end of process monitoring, end of pipe monitoring locations, or both (i.e., end of process for determining categorical Pretreatment Standard compliance and end of pipe for determining local Pretreatment Standard compliance).]

[Documentation of rationale for monitoring locations / sampling points]

J. RATIONALE FOR MONITORING FREQUENCY REQUIREMENTS

[Note: The permit writer should adequately document the rationale used for establishing the permittee’s monitoring requirements. In addition, the permit writer should review both the minimum federal monitoring frequency and the minimum monitoring frequency established by its approved program before establishing monitoring frequency requirements.

Prior to implementing alternative monitoring frequency options less stringent than the federal requirement, the permit writer must ensure that the Control Authority has established the legal authority within its approved program to implement these options. Alternative monitoring frequency options include, but are not limited to:

- Reduced monitoring (40 CFR 403.12(e)(3))
- Monitoring waivers (40 CFR 403.12(e)(2))
- Classification of NSCIU (40 CFR 403.3(v)(2))
- Monitoring waivers in on the basis of specific categorical Standards]

[Documentation of rationale for monitoring frequency requirements]

K. RATIONALE FOR REPORTING REQUIREMENTS

[Note: The permit writer should adequately document the rationale used for establishing the permittee’s reporting requirements. In addition, the permit writer should review both the minimum federal and the minimum reporting frequencies and requirements established by its approved program before establishing reporting frequencies and requirements.

Prior to implementing alternative reporting options less stringent than the federal requirement, the permit writer must ensure that the Control Authority has established the legal authority within its approved program to implement these options. Alternative monitoring frequency options include, but are not limited to:

- TTO certification
- Reduced monitoring reporting (40 CFR 403.12(e)(3))
- Monitoring waiver reporting (40 CFR 403.12(e)(2))
- NSCIU reporting (40 CFR 403.3(v)(2) & 40 CFR 403.12(q))
- Specific reporting requirements as listed in specific categorical Standards]

[Document monitoring reporting requirements]

Signatory Requirements

According to 40 CFR 403.12(l), periodic compliance reports must be signed by an authorized facility representative. [Name of Facility] has designated the following individuals as authorized facility representative(s).

Name	Title
[Name]	[Title]

L. RATIONALE FOR SPECIAL CONDITIONS

[Note: The permit writer should describe any special conditions imposed in the permit. Special conditions can include, but is not limited to special definitions, compliance schedules, equivalent mass limit requirements, equivalent concentration limit requirements, one time monitoring requirements, biomonitoring or other toxicity requirements, sludge disposal plans, or additional monitoring of pollutant that are limited in the permit in response to noncompliance.]

[Documentation of rationale for any special permit conditions.]

M. RATIONALE FOR EFFLUENT LIMITATIONS

[Note: Permit writer should discuss the basis for classifying the IU. Important information should include: 1) starting date of operation; 2) process operations; 3) process modification (if any); and 4) process wastewater flow rates. The documentation of the rationale for effluent limits should also include, but not limited to:

- The classification of existing versus new source, or the possibility that a CIU is subject to both existing and new source requirements (for CIUS)
- Cyanide effluent limits (whether compliance with either cyanide (Total) or cyanide (amenable) is more appropriate)
- Combined wastestream formula
- Production-based limits
- Total toxic organic monitoring or toxic organic management plan requirements
- Calculation of equivalent limits
- Site specific local limits
- Special local limit considerations

If alternative limits are established, the permit writer should include any applicable calculations in Section O of the permit fact sheet.]

[Include the list of the actual effluent limitations included in the permit and Document the rationale for those effluent limitations.]

N. RATIONALE FOR SAMPLE TYPE

[The permit writer should document its rationale for requiring composite sampling, grab sampling, or both. If composite sampling is required, the rationale should include whether flow proportional or time proportional composite sampling is more appropriate. In addition, the permit writer should include documentation of whether continuous monitoring is required.]

[Documentation of rationale for sample type.]

O. EXAMPLE CALCULATIONS

[Note: The permit writer should include the following if the CWF applies due to dilution and/or if an integrated facility]

The federal categorical pretreatment standards for [Name of Facility] were adjusted using the combined wastestream formula (CWF). The steps used to compute the alternative daily maximum and monthly average limits are as follows:

Step 1: Reference the combined wastestream formula from 40 CFR 403.6 (e):

$$C_T = \left[\frac{\sum_{i=1}^N C_i * F_i}{\sum_{i=1}^N F_i} \right] \left[\frac{F_T - F_D}{F_T} \right]$$

Where:

C_T = Alternative concentration limit for the pollutant;

C_i = Categorical pretreatment standard concentration limit for the pollutant in regulated stream i;

F_i = Average (at least 30 day average) daily flow of regulated stream i;

F_D = Average daily flow (at least 30-day average) of dilute wastestream(s);

F_T = Average daily flow (at least 30-day average) through the combined treatment facility, including regulated, unregulated, and dilute wastestreams;

N = Total number of regulated streams.

Step 2: Calculation of the Alternative Daily Maximum and Monthly Average Limits:

[Include a sample calculation of an alternative daily maximum and monthly average limit using appropriate variable values. The permit writer should include a list of all variable used.]

O. EXAMPLE CALCULATIONS (Continued)

[For calculation equivalent mass limits for concentration limits]

Step 1: Calculate the equivalent mass limit for the daily maximum concentration Standard:

$$M_{DEQ} = 8.34 * Q_{AVG} * C_D$$

M_{DEQ}	=	Equivalent daily mass limits, lbs/day
8.34	=	Conversation factor
Q_{AVG}	=	Actual Average Daily Flow, million gallons per day [Note to permit writer: The period of when the flow rate value was determined should be documented]
C_D	=	Daily maximum categorical Pretreatment Standard, milligrams per liter

Step 2: Calculation the equivalent mass limit for the monthly average concentration Standard:

$$M_{MEQ} = 8.34 * Q_{AVG} * C_M$$

M_{MEQ}	=	Equivalent monthly mass limits, lbs/day
8.34	=	Conversation factor
Q_{AVG}	=	Actual Average Daily Flow, million gallons per day
C_M	=	Monthly average categorical Pretreatment Standard, milligrams per liter

[Include sample calculations of production-based limits, including applicable production values and flow rates.]

P. SLUG DISCHARGE EVALUATION

The [Name of POTW] conducted a slug discharge evaluation of [Name of Facility] on [Date].

[Note: The permit writer should select one of the following applicable conditions:]

[For IUs required to develop and implement a slug discharge control plan]

The [Name of POTW] has determined that [Name of Facility] is required to develop and implement a slug discharge control plan.

[For IUs that have develop and implement a slug discharge control plan]

The [Name of POTW] has determined that [Name of Facility] is required to develop and implement a slug discharge control plan. The plan was submitted to the [Name of POTW] on [Date]. The plan was reviewed on [Date] to ensure it contained all of the minimum federal requirements as listed 40 CFR 403.8(f)(2)(vi).

[For IUs not required to develop or implement a slug discharge control plan]

The [Name of POTW] has determined that [Name of Facility] is not required to develop and implement a slug discharge control plan.

Prepared By: _____ Date: _____

Reviewed By: _____ Date: _____

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation
 * State: AR
 Compliance Monitoring Activity Name: *LR Pretreatment*
 Compliance Monitoring Type: *Pretreatment Program Audit*
 If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method:
 (Allen Gilliam)

Linked Facility

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	AR0021806	(C-40177 & 50849)		

Compliance Monitoring Dates

Planned Start Date	Actual Start Date
11/13/12	11/13/12
Planned End Date	Actual End Date
11/15/12	11/15/12

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
<p>SIC Codes:</p> <p>NAICS Codes:</p>					
<p>Codes:</p>			<p>Priorities:</p> <p>OECA National Priority:</p> <ul style="list-style-type: none"> 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 <p>Regional Priority:</p> <ul style="list-style-type: none"> 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: 24

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: