

January 18, 2011

David Jurgens, Utilities Department Director City of Fayetteville-Paul R. Noland WWTP 113 W. Mountain Fayetteville, AR 72701

RE: City of Fayetteville-Paul R. Noland WWTP

AFIN: 72-00102 NPDES Permit No.: AR0020010

Dear Mr. Jurgens:

On December 10 and 13, 2010, I performed a routine pretreatment compliance inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. This inspection revealed that you are in compliance with the terms of your permit.

If I can be of any assistance, please contact me at 479-267-0811, ext. 12 or (west@adeq.state.ar.us).

Sincerely.

Alison West
District 1 Field Inspector

Water Division

cc: Water Division Enforcement Branch

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Water Division Permits Branch

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	ne and Location of Facility Inspect include POTW name and NPDE					rs dis	scha	rging	to PC	TW	/,	Entry Tir 8:40 a.m			10			Permit Effective Date						
City	of Fayetteville-Paul R. Noland N. Fox Hunter Road				,						-	9:30 a.m	-		-			6-1-06						
	etteville, AR 72701											Exit Time			10			Permit Expiration Date						
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Duy	ne(s) of On-Site Representative(s ren Tran/Plant Manager/479-443 iise Georgio/Industrial Pretreat	3-329	2/479	443-	5613				0_44	-56	12						Oth	ner Fa	cility [Data				
	ne, Address of Responsible Offici								9-44.	-36	113						l							
Dav	rid Jurgens/Water and Wastewa of Fayetteville								-8257	•			Conf	tacted	ł									
113	W. Mountain											Yes □ No ☑												
Fay	etteville, AR 72701											100		140										
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N	Records/Reports	N	Self	-Moni	toring	g Pro	ogra	m	-	1	Slu	Sludge Handling/Disposal N				Poll	ution	Prev	/enti	on				
N	Facility Site Review	N	Con	plian	ce Sc	ched	lules	;		-	Pretreatment N					Multimedia								
N	Effluent/Receiving Waters	N		orato		· =·							Other:											
Section D: Summary of Findings/Comments (Attach additional sheets if necessary) Facility is in compliance with the permit.																								
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	me(s) and Signature(s) of Inspect on West	or(s)						y/Offi ept. o				e/Fax ntal Qual	ity-Fa	ayette	eville				Date 1-3-2011					
gan	alien West					47	79-20	67-08	11, e	xt. 1	12/4	79-267-08	19											
Sig	nature of Reviewer					Α	Agen	cy/Off	ice/P	hon	e ar	d Fax Nu	mber	S				Dat	e					

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Fayetteville

AFIN Number: **72-00102**

NPDES Permit Number(s): AR0020010, AR0020010C, AR0050288,

ARR00C377

Program Tracked under NPDES Permit Number: AR0020010

Fact Sheet Preparation Date: Unknown

Date of Last PCI/Audit: December 17, 2007/October 19-22, 2009

Date of Last Annual Report: May 2010

Name of Inspector: Alison West

Date PCI Performed: December 10 and 13, 2010

Name, Title, and Telephone Number of Facility Representative:

Denise Georgio/Industrial Pretreatment Coordinator/479-443-3292

Duyen Tran/Plant Manager/479-443-3292

Name and Title of Other Participants: NA

Number of IUs Visited: 2

Name(s) of IUs Visited: Ayrshire Electronics, Marshalltown

Company

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

- 1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection.
 - K-D Tools was voided November 21, 2009.
- 2. Has ADEQ or EPA been notified of these changes? Yes
- 3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes
- 4. What procedures are being used to update the IU Survey?

 Review of newspaper/phonebook, permit reapplication

 requirements, on-site inspections, citizen involvement,

 industrial user questionnaires, review of water billing
 records
- 5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 8
- 6. Number of Categorical Industrial Users: 4
- 7. How does the POTW determine the appropriate categorical standards to apply to an IU? IU information, Federal Register, EPA seminars and guidance manuals, EPA and State pretreatment personnel, SIC codes, and a description of the manufactures processes
- 8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU: Marshalltown Tools	Category: Metal Finishing	Regulated Process: Phosphate Coating
Custom Powder	Metal Finishing	Phosphating
Coating		
Elkhart Products	Copper Former	Drawing and Forming
Superior Industries	Metal Finishing	Phosphating

B. LOCAL LIMITS

- 1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, technically based. POTW is in the process of redoing local limits.
- 2. Describe any apparent problems with the local limits.
 In 2008, split flow between two plants. Lost K-D Tools.

 Superior dropped chrome plating. Local limits are outdated.
 Custom Powder Coating was permitted to discharge to Fayetteville.
- 3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

		Require	ment in	
Pollutant:	Frequency:	Permit:	Program:	Comments:
Metals: Influent:	1/month	2/year	Not req.	
Effluent:	2/year	2/year	Not req.	
Sludge:	1/year	Not req.	Not req.	Sludge is being disposed at a landfill.
Organics: Influent:	1/year	1/year	Not req.	
Effluent:	1/year	1/year	Not req.	
Sludge:	1/year	None	Not req.	

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?

No.

C. IN	DUSTRIAL	USER	CONTROL	MECHANISM
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Revocation clause: Yes
Penalty Provisions: Yes

Slug load notification: Yes
Notification of process change:

1.	Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes
2.	How many IU permits (or other control documents) have been issued? 8
3.	DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT. Yes
4.	Does the control document contain the following items? Files reviewed Marshalltown Tools and Ayrshire Electronics An expiration date: Yes
	Discharge limitations: Yes
	If the program requires self-monitoring by the IUs, do the Permits contain:
	IU self-monitoring requirements: Yes
	10 Bell monitoring requirements
	IU reporting requirements: Yes
5.	Indicate which of the following recommended standard conditions are contained in the control documents:
	Sample location: Yes
	Type of sample: Yes
	Monitoring frequency: Yes
	Bypass prohibition: Yes
	Right of entry: Yes
	Nontransferability: Yes

Yes

D. MONITORING OF IUS BY POTW

1.	Indicate current ins requirement below:	spection and sampling frequ	uency and program			
	-	Current frequency:	Program Requirement:			
	Sampling: categorical IUs	1/year	1/year			
	other SIUs	1/year	1/year			
	Inspection: categorical IUs	1/year	1/year			
	other SIUs	1/year	1/year			
2.	HAS EACH SIU BEEN IN REQUIRED BY THE APPR	ISPECTED AND SAMPLED AT THE	FREQUENCY			
3.	Are inspections anno	ounced or unannounced?	announced			
4.	Are records kept of	each inspection? Yes				
5.	Does the inspection report contain an adequate description of the following:					
	Date and time of ins	spection: Yes				
	Officials present:	Yes				
	Inspection of chemic	cal storage areas: Yes				
		ated processes, categoricant these waste streams: Ye	al waste streams, and es			
	Inspection of the pr	retreatment facilities: Ye	es			
	Review of self-monit	coring records: Yes				
	Observation of IU se	elf-monitoring procedures:	Yes			
	Verification that ag	pproved analytical techniqu	ues are used: Yes			
	Verification of IU f	flow measurement (where red	quired): Yes			
6.	Overall adequacy of	inspection documentation:	Good			

	Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes
	Are sampling and flow monitoring equipment properly maintained? Yes
	Is the POTW keeping proper field notes and chain of custod forms? POTW is not keeping field notes once the final
	inspection report is completed. EPA recommends that field notes be discarded once the inspection report is completed
	Is the sampling location representative of the discharge the collection system? Yes
	Are sampling locations identified in POTW records? Yes
	Are sampling services available in an emergency? Yes
	What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Pretreatment officer utilizes a tickler file and
_	a file folder system. Also, a computer calendar is used.
_	All reports are reviewed by the pretreatment officer.
	ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?
_	Yes

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:
Name and address: Yes
Other environmental permits held: Yes
Description of operations: Yes
Process flow diagrams: Yes
Flow measurements: Yes
Measurements of regulated pollutants: Yes
Certification of compliance by the IU: Yes
Compliance schedule (if needed): N/A
Additional comments on the POTW's inspection and sampling procedures: Inspection and sampling procedures appear adequate. All facilities are inspected and sampled at leas
once per year. Field notes are recorded on a rough draft

Ε.	Enforcement
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1.	HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO
	ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT
	STANDARDS AND REQUIREMENTS? Yes, the facility has an approved
	formal enforcement plan.

2. How does the POTW respond to the following violations?

Effluent limitations: NOV, Fine, CDO, CO, show cause hearing, judicial action, suspend services, or revoke permit depending on the specifics of violation.

Late reports: Informal notice, NOV, fine-depending on the number of days the report is late

Unpermitted discharges: <u>Informal notice</u>, CO, NOV, CDO, Fine depending if harm was caused at the POTW, to POTW personnel, or the public

Slug loads or spills: NOV, Fine, CDO, suspension of services, CO, or civil action depending if harm was caused or not

- 3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? There were no significant violators for 2009. At the time of the investigation, there were no significant violators for 2010.
- 4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
N/A	N/A	N/A	N/A
	_	_	

5.	Comments on the POTW's enforcement procedures: Enforcement procedures appear adequate. There has not been
	any IU's in significant violation that required publishing in
	the newspaper for 2009.
<u>F.</u>	POTW'S PRETREATMENT ORGANIZATION STRUCTURE
1.	Is the program structure essentially the same as that presented in the approved pretreatment program? Yes
2.	Are staffing levels adequate? Yes
3.	Are the responsible officials familiar with the approved program? Yes
G.	MULTIJURISDICTIONAL ISSUES
1.	List any IUs which are located outside of the jurisdictional area of the POTW: None
2.	Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? Yes
3.	Does the POTW have copies of permits for IUs in other cities? N/A
4.	Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? N/A
5.	Comments on multijurisdictional issues: No SIU's in user cities.

H. EVALUATION AND COMMENTS
POTW is in compliance with pretreatment regulations and their
permit. Overall, it appears that the pretreatment program is
being administered in a satisfactory manner. No industries have
been in significant non-compliance and reported in the newspaper
for the facility's reporting period 2009.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Marshalltown Company POTW Name: City of Fayetteville Industry Contacts: Robert O'Connel Date and Time of Visit: 12-13-2010/11:00 a.m.-11:55 a.m. Description of Manufacturing Process: Manufactures hand and edge tools for cement finishing and masonery. Sources of Process Wastewater: Dust collectors, neutralized etching solution, washing, grinding, painting, and vibrating finisher. Categorical Industry? Yes, metal finishing Basis for Limits: Combined Waste Stream Point of Application: End of pipe Description of Pretreatment Equipment and Procedures: pH adjustment, dust collectors, filtration and settling Spill Prevention and Solvent Management Procedures: Facility has developed a Toxic Organics, Storm Water, and Pollution Prevention & Emergency Responses Contingency Plan. Sampling Location and Equipment: MTT001 is the manhole located 221 feet east of the loading dock on the east side of the phase 1 building. Sampling is performed by a contract lab.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Ayrshire Electronics, LLC							
POTW Name: City of Fayetteville							
Industry Contacts: Tim Pearce, VP of Engineering							
Date and Time of Visit: 12-13-10/9:35 a.m10:35 a.m.							
Description of Manufacturing Process: Assemble printed circuit boards and metal parts.							
Sources of Process Wastewater: Wave solder, occasional stencil cleaning, reflow soldering							
Categorical Industry? N/A							
Basis for Limits: Performance Based Limits							
Point of Application: End of process							
Description of Pretreatment Equipment and Procedures: Sedimentation tank							
Spill Prevention and Solvent Management Procedures: Facility has a solvent toxic organic management plan and spill							
prevention plan.							
Sampling Location and Equipment: Location 001: the sampling tank after the flume in the							
treatment building off the north side of the plant.							
Sampling and analysis performed by contract lab.							

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

			CODE					
INSPECTOR'S NAME:	A1	ison West						
NAME OF FACILITY:								
PERMIT NUMBER USED TO TRACK PROGRAM:	A	R0020010	NPID					
DATE OF PCI:	December	10 and 13, 2010	DTIA					
	PPETS WENDB DATA	FTFMFN12						
NUMBER OF SIGNIFICA	NT IUS (SIUS):	8	SIUS					
NUMBER OF CATEGORIC	AL IUS:	4	CIUS					
SIUS NOT SAMPLED OR POTW:	INSPECTED BY	0	NOIN					
SIUS WITHOUT CONTRO	L MECHANISM:	0	NOCM					
SIUS IN SIGNIFICANT WITH STANDARDS OR R		0	PSNC					
SIUS IN SIGNIFICANT WITH SELF-MONITORIN		0	MSNC					
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT								
INSPECTED OR SAMPLE	D BY POTW:	0	SNIN					

⇒ EPA							Form Approved OMB No. 2040-0003			
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460										
	NPDES	Co	mpliance	•	ctio	n Report				
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Т	ransaction Code		NPDES			Yr/Mo/Day	Insr	pec. Type Inspector Fac. Type		
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				Section I	B: Facil	ity Data				
also Ayr	ne and Location of Facility Inspec o include POTW name and NPDE shire Electronics, LLC			s discharging to	POTW,	Entry Time/Date 9:35 a.m./12-13-10		Permit Effective Date NA		
Fay	1 S. Beechwood etteville, AR 72701 of Fayetteville-AR0020010					Exit Time/Date 10:35 a.m./12-13-10		Permit Expiration Date NA		
	ne(s) of On-Site Representative(s) Pearce/VP of Engineering/479			x Number(s)			Oth	ner Facility Data		
Nar	me, Address of Responsible Offic	ial/Tit	le/Phone and Fax	Number			1			
Tim	Pearce/VP of Engineering/479			11011100.		Contacted				
	shire Electronics, LLC 1 S. Beechwood									
	retteville, AR 72701					Yes ✓ No □				
			Section	on C: Areas Ev	aluatod	During Inspection				
						satisfactory, N = Not Evaluated)				
N	Permit	N	Flow Measurem	ent	N Operations & Maintenance N			Sampling		
N	Records/Reports	N	Self-Monitoring	Program	N	Sludge Handling/Disposal	N	Pollution Prevention		
N	Facility Site Review	N	Compliance Sch	nedules	Y	Pretreatment	N	Multimedia		
N	Effluent/Receiving Waters	N	Laboratory		N s	Storm Water	N	Other:		
	S	ectio	n D: Summary of	Findings/Comm	nents (/	Attach additional sheets if nece	ssary	y)		
						and material storage area.				
containers of raw material of conformal coating were approximately 30 feet from an uncovered floor drain. The raw material of										
conformal coating containers was stored on a shelf. The drum of Xylene had no secondary containment. The uncovered floor drains discharge to the storm sewer. On January 3, 2011, I spoke with Mr. Pearce. Mr. Pearce informed me the Xylene is now										
stored in a chemical storage building. Mr. Pearce stated that the floor drains will be sealed in the next two weeks. I informed Mr.										
Pearce to conduct a thorough walk through to determine if there are any other uncovered floor drains where pollutants may										
discharge to the storm sewer.										
Name(s) and Signature(s) of Inspector(s) Agency/Office/Telephone/Fax Date										
Alison West AR Dept. of Environmental Quality-Fayetteville 479-267-0811, ext. 12/479-267-0819						12-20-2010				
F 0										
Sig	Signature of Reviewer Agency/Office/Phone and Fax Numbers Date									

POTW Pretreatment Program

Industrial Site Visit

Na	Name of Industry: <u>Ayrshire Electronics, LLC</u>								
Ind	Industry Contacts: Tim Pearce. VP of Engineering								
Ty	Type of Industry: SIC Code-3672 Printed Circuit Boards								
Da	te of Visit: <u>12-13-2010</u>								
1.	Significant industrial user:	X	Yes		No	Not Determined			
2.	Pretreatment equipment or procedures?	X	Yes		No	N/A			
3.	Pretreatment equipment maintained and operational?	X	Yes		No	N/A			
4.	Hazardous waste generated or stored?	X	Yes		No	N/A			
5.	Proper solid waste disposal?	X	Yes		No	N/A			
6.	Solvent management/TTO control?	X	Yes		No	N/A			
7.	Suitable sampling location?	X	Yes		No	N/A			
8.	Appropriate self-monitoring procedures / equipment?	<u>X</u>	Yes		No	N/A			
9.	Adequate spill prevention?		Yes	X	No	N/A			
10.	Industry familiar with limits and requirements?	<u>X</u>	Yes		No	N/A			
Ac	lditional Comments:								
Uncovered floor drains were observed in the area of the wave solder and material storage area. A 55 gallon drum of Xylene and containers of raw material of conformal coating were approximately 30 feet from an uncovered floor drain. The raw material of conformal coating containers was stored on a shelf. The drum of Xylene had no secondary containment. The uncovered floor drains discharge to the storm sewer. On January 3, 2011, I spoke with Mr. Pearce. Mr. Pearce informed me the Xylene is now stored in a chemical storage building. Mr. Pearce stated that the floor drains will be sealed in the next two weeks. I informed Mr. Pearce to conduct a thorough walk through to determine if there are any other uncovered floor drains where pollutants may discharge to the storm sewer.									
Vis	sit Conducted By: Alison West		Date:	1	2-13-20	10			

≎ EPA							Form Approved OMB No. 2040-0003	
	NPDES	Compliance	e Insped	ction	Report			
		Se	ction A: Nation	al Data S	ystem Coding			
1 1	Fransaction Code N 2 5 3 A R 0	pec. Type Inspector Fac. Type 19 S 20 2						
	0 0 2							
	Inspection Work Days 67 69	Facility Evaluation F	Rating E	N 72	QA74 74	75	Reserved	
			Section B	3: Facility	Data			
also Mas	ne and Location of Facility Inspec o include POTW name and NPDE shalltown Company		s discharging to I	POTW,	Entry Time/Date 11:00 a.m./12-13-10		Permit Effective Date NA	
Fay	0 Industrial Drive retteville, AR 72701 v of Fayetteville-AR0020010				Exit Time/Date 11:55 a.m./12-13-10		Permit Expiration Date NA	
	me(s) of On-Site Representative(s pert O' Connell/Manufacturing E	her Facility Data						
Name, Address of Responsible Official/Title/Phone and Fax Number Robert O' Connell/Manufacturing Engineering Manager/479-521-8787 Mashalltown Company 2200 Industrial Drive Fayetteville, AR 72701 Contacted Yes No								
					During Inspection tisfactory, N = Not Evaluated)		
N	Permit	N Flow Measurem	ent	N Op	erations & Maintenance	N	Sampling	
N	Records/Reports	N Self-Monitoring	Program	N SIL	udge Handling/Disposal	N	Pollution Prevention	
N	Facility Site Review	N Compliance Scl	hedules	Y Pre	etreatment	N	Multimedia	
N	Effluent/Receiving Waters	N Laboratory		N Sto	orm Water	N	Other:	
		ection D: Summary of	Findings/Comm	nents (Att	tach additional sheets if n	ecessar	y)	
No comments.								
Name(s) and Signature(s) of Inspector(s) Alison West AR Dept. of Environmental Quadrate 479-267-0811 ext 12/479-267-08					ental Quality-Fayetteville		Date 12-13-10	
Sig	Signature of Reviewer Agency/Office/Phone and Fax Numbers Date							

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Marshalltown Company										
Ind	Industry Contacts: Robert O' Connell, Manufacturing Engineering Manager									
Ty	Type of Industry: SIC Code 3423-Hand and Edge Tools									
Da	te of Visit: <u>12-13-10</u>									
1.	Significant industrial user:	X	Yes	No		Not Determined				
2.	Pretreatment equipment or procedures?	X	Yes	No		N/A				
3.	Pretreatment equipment maintained and operational?	X	Yes	No		N/A				
4.	Hazardous waste generated or stored?	X	Yes	No		N/A				
5.	Proper solid waste disposal?	X	Yes	No		N/A				
6.	Solvent management/TTO control?	X	Yes	No		N/A				
7.	Suitable sampling location?	X	Yes	No		N/A				
8.	Appropriate self-monitoring procedures / equipment?	<u>X</u>	Yes	No	X	N/E				
9.	Adequate spill prevention?	<u>X</u>	Yes	No		N/A				
10.	Industry familiar with limits and requirements?	X	Yes	No		N/A				
Ad	lditional Comments:									
Vis	sit Conducted By: Alison West		Date: _	12-13-10						