ADEQ

ARKANSAS
Department of Environmental Quality

November 10, 2009

David Jurgens, Utilities Director
City of Fayetteville
113 W. Mountain Avenue
Fayetteville, AR 72701

Re: City of Fayettevile (AFIN 72-00102 NPDES #AR0020010) Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Jurgens:

Please find enclosed the finished report for the audit/assessment conducted October 19 through October 22, 2009. The report should be made available for review to appropriate industrial officials. Your staff should discuss and evaluate the findings in this report. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

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

Please do not hesitate to contact the Department if the City has questions or concerns.

Sincerely,

Rufus J. Torrence, Water Division Engineer

Encl: Audit/Assessment Checklist

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

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF FAYETTEVILLE, ARKANSAS

NPDES PERMIT #AR0020010

November 10, 2009

Prepared by: Rufus Torrence

Water Division Engineer II

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 Northshore Drive

North Little Rock, Arkansas 72118

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LIST OF ATTACHMENTS

A) INTRODUCTION

In accordance with ADEQ's (department) responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, the department will conduct audits of Pretreatment Programs within the state as part of its coordination and compliance monitoring strategy.

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

The Water Division Engineer performed an audit from October 19th through the 22nd, 2009 on the Pretreatment Program implemented by the City of Fayetteville, Arkansas.

Participants included:

Rufus Torrence	ADEQ / Water Division Engineer / Auditor
Denise Georgiou	City (OMI) / Industrial Pretreatment Coordinator
Duyen Tran	City (OMI) / Assistant Project Manager

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Fayetteville'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

The City of Fayetteville's Pretreatment Program is administered and implemented by OMI, Inc. under a multi-year operations contract. "City" may also be interchanged with "OMI" in this document and attachments.

The original Program was approved April 26, 1984. The City modified the approved original Program and ADEQ incorporated the modification into the NPDES permit on July 14, 1998. The City must modify the program again to include recent revisions to 40 CFR Part 403 commonly referred to as the "Streamlining Revisions" promulgated on October 5, 2005.

The City has two wastewater treatment plants (Publicly Owned Treatment Works—POTWs). The City's Noland wastewater treatment plant consists of a biological nutrient removal/activated sludge system which includes aeration basins with RAS and aerobic, anaerobic and anoxic zones, secondary clarification, sand filtration and disinfection by ultraviolet light. The City discharges the wastewater into an unnamed tributary that enters the West Fork of the White River. The new Westside wastewater treatment plant consists of bar screens, fine screens, three stage biological treatment system and disinfection by ultraviolet light. The City discharges the wastewater into Goose Creek which enters the Illinois River.

There has been no pattern of aquatic toxicity observed in either POTW's effluent although in March 2007, the Noland POTW effluent had both lethal and sub-lethal effects on the Ceriodaphnia dubia (water fleas). The two required subsequent retests passed both lethal and sub-lethal endpoints.

The Noland POTW has a design flow of 11.2 MGD and an average influent flow of 6.0 MGD. Approximately 13% of the flow is from 9 significant industrial users (SIUs), 5 of which are categorical. Approximately 2750 dry tons of sludge per year is shipped to a landfill. The Westside POTW has a design flow of 10 MGD and an average influent flow of 6.0 MGD. The Westside POTW currently has no SIUs.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of their industrial user files, pretreatment records, site visits to four (4) of their permitted industrial users and one (1) suspected non-permitted categorical metal finisher. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included in Attachment(s) A.

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

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

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

1) Under ***40 CFR 403.5(c)*** *"Each POTW with an approved pretreatment program shall continue to develop [local] limits as necessary..."* Under **40 CFR 122.44(j)(2)(ii)**, the City must update or assess local limits at least every permit cycle.

The City's last "official" assessment of local limits occurred in 1998 when the City modified the program to include specific local limits.

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

1) The City should include a fact sheet with every permit. The fact sheet should be an integral part of the permit, and the entire permit should be given to the permittee.

2) The City should verify that 40 CFR Part 464 is not applicable to Superior Industries or Elkhart. During the file review in November 2006, the previous auditor indicated that no wastewater was generated by the Aluminum casting operations [40 CFR Part 464 Subpart A]. However, during the October 21, 2009 site visit, this auditor confirmed that Superior had a Solution Heat Treatment operation (which is normally followed by a "water" quench) and that Elkhart has a copper casting operation [40 CFR Part 464 Subpart B]. The City should confirm that no wastewater from any 40 CFR Part 464 operation enters, can enter or will enter the POTW collection system from either of these facilities.

3) The City should add an additional column to the Enforcement Response Plan chart to show which official is responsible for each type of enforcement action.

4) The City should not issue permits with both local limits and categorical pretreatment standards for the same parameter except as noted below. The City should compare the two requirements and list only the more stringent requirement in the permit. Based on the information in Superior's permit in Table I-1 (see attachment B-6/26), the Daily Maximum limit for Zinc in the permit should be only 0.45 mg/l based on an allowable 0.64 lbs/day in the discharge at an average flow rate of 0.17 mgd. The City should not show either the Daily Maximum (2.27 mg/l) or the Monthly Average (1.29 mg/l) in Superior's permit for this case; only the local limit for zinc should be shown the table. Refer to attachment J-1/1 for more details on EPA guidance. Note in the Example Fact Sheet that some parameters are controlled by a local limit while others are controlled by categorical standards. No parameter has both a local limit and a categorical limit unless the local limit is not as stringent as the "Monthly Limit" (this case is applicable to Nickel in the Example Fact Sheet).

5) *"Recommend including pollution prevention (P2) questions in future industry/business surveys as well as in current SIU permit applications* (Gilliam Audit Report 2006)."

7) *"Recommend all metal finishers under* ***CFR 433*** *periodically review their existing toxic organic management plans (TOMPs), where applicable, and update as necessary. The City should also have a correspondence in that IU's file indicating the TOMP has been reviewed and approved* (Gilliam Audit Report 2006)".

8) The City should not show numerical limits in the ordinance. Refer to attachment K-1/2; the City has listed numerical limits in ordinance/code. The City should revise the language in the ordinance to show the following:

<u>*Local Limits*</u>

To protect against pass through and interference, no Industrial User may discharge or cause to be discharged into the POTW any wastewater pollutant concentration exceeding the Technically Based Local Limits <u>(TBLLs)</u> developed from time to time by the Utilities Director of City of _____ Utilities as required by Part III in City of _____ NPDES permits No. AR00_____, authorized by 40 CFR 403.5 (c) and approved by the Approval Authority. TBLLs based on calculated Maximum Allowable Industrial Loadings are located in the City's Pretreatment Program, Section ____. At the discretion of the Utilities Director, TBLLs may be imposed and shall apply at the "monitoring point" described in the individual industrial wastewater discharge permits. All concentration limits for metals shall be in terms of "total" metals unless otherwise indicated. At the discretion of the Utilities Director, mass limitations may be imposed in addition to or in place of concentration based TBLLs. The Utilities Director may also develop BMPs in individual wastewater discharge permits, to implement specific pollutant limitations. Such BMPs shall be considered Local Limits and Pretreatment Standards. When new Local Limits are implemented or revised, the Utilities Director will provide individual notice to parties who have requested such notice and an opportunity to respond, as set forth by 40 CFR 403.5 (c) (3). This requirement of notice also applies when Local Limits are set on a case-by-case basis.

9) *"Recommend including P2 audits as an enforcement option in current Program's Enforcement Response Guide* (Gilliam Audit Report 2006)".

10) *"Recommend including the general and specific prohibitions in* ***40 CFR 403.5(a)(1) & (b)*** *in all SIUs' permits* (Gilliam Audit Report 2006)".

11) The City should add Molybdenum to the list of Table III parameters and also test for Molybdenum on a quarterly basis at the Noland plant and semi-annually at the West Side plant.

12) In reference to the language in each permit (Part III sec A.18; see attachment B-16/26), the City should modify the title to show "**Limitations on Permit Transfer**" and include this topic sentence as the first sentence in the section:

"*The permit is nontransferable to any person except after notice to the Control Authority*".

See the enclosed "Pretreatment Audit Checklist" Section III paragraph B.3 and footnote number three (3) for more details.

13) The City should not list any limits in the SIU permits which are not local limits or categorical limits. Referring to attachment F-1/1, the City has listed TSS limits in Pinnacle Foods' permit. The City may continue to show the TSS limits if the City clearly adds a disclaimer. The City may add a footnote to declare that the TSS limits are not national pretreatment standards or requirements and, hence, are not subject to the requirements in Code 51.

14) The Marshalltown Toxic Organic Management Plan (TOMP) should have more details. Referring to attachment G-11/23, the plan should list each toxic organic of concern. Referring to attachment G-13/23, the "Method of Disposal" should list the toxic organic in each chemical. Referring to attachment G-18/23, under "Employee Training" paragraph number 7 lists training on proper disposal; however, employees should also be educated on the content of the chemicals to avoid inadvertently contaminating the wastewater discharged to the sewer.

15) Referring to attachment C-9/11, the City change the title of section L in the inspection report form to show "**Accidental Spill and Slug Discharge Control**". The City should continue to evaluate each SIU's slug control plan or the necessity to develop a plan.

16) The City appears to have modified Elkhart's permit to "increase" the allowable loading of zinc to the POTW. Referring to attachment H-2/4, the zinc limit is 0.48 lb/day. Referring to attachment H-4/4, the "local limit/allocation" for zinc for Elkhart was only 0.023 lb/day. The City should provide justification for increasing Elkhart's allocation for zinc. The City should provide information in the fact sheet to show the MAIL (Maximum Allowable Industrial Loading) and to show that the increase in Elkhart's allowable loading of zinc along with all other allocations for zinc did not exceed the MAIL for zinc. Note that the City must not increase Elkhart's allowable loading for zinc over the categorical limit of 0.654 lb/day.

D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS

The City's Pretreatment Program must be modified to be current with the newly revised ***40 CFR 403***. The City must comply with the most recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). The City must review the existing approved program and make all necessary modifications to comply. Some of the streamlining changes are less stringent then the previous pretreatment regulations and the City may at its option elect to include these changes in the program modification. However, thirteen (13) elements are more stringent than the previous pretreatment regulations and the City must ensure that the approved program contains all applicable more stringent streamlining changes. The City should note that some of the elements may not be applicable to the City's approved program

E) CONCLUSIONS

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

A. GENERAL INFORMATION

Control Authority Name: *City of Fayetteville* NPDES #: *AR0020010*
Mailing address: *113 W. Mountain Ave., 72701*

Permit Signatory: *David Jurgens, P.E.* Title: *Utilities Department Director*

Telephone: *(479) 575-8330* FAX NUMBER: *(479) 575-8257*

Pretreatment Contact: *Denise Georgiou* Title: *OMI Ind. Pretreat. Coord.*
Address: *1400 N. Fox Hunter Road, 72701*
Telephone: *(479) 443-3292*
E-mail: denise.georgiou@CH2M.com

Pretreatment program approval date: *April 26, 1984*

Dates of approval of any substantial modifications: *July 14, 1998*

Month Annual Pretreatment Report Due: *May*

Pretreatment Year Dates: *Jan 1 - Dec 31* Date(s) of Audit: *Oct 19 - Oct 22* (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
**Denise Georgiou*	*Industrial Pret. Coord.*	*(479) 443-3292*
Duyen Tran	*Project Mgr*	" "

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	*Dec 2008*	*Custom Powder had unpermitted surface disc*
PCI	*Nov 2007*	*Custom Powder* had unpermitted sewer disc*

**Custom Powder Coating, Inc has wastewater regulated by 40 CFR 433*

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
*AR0020010	Paul R. Noland	Jun 1, 06	May 31, 11
AR0050288	West Side WWTP	Dec 1, 05	Nov 30, 10

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Paul R. Noland
Location Address: 1400 N. Fox Hunter Rd, 72701

Expiration Date of NPDES Permit: AR0020010

Treatment Plant Wastewater Flow: Design- 11.2 MGD; Actual (Average)- 9.67 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 9 # of CIUs : 5
Industrial Flow (mgd): 1.24 Industrial Flow (%) : 12.8 %

Level of Treatment		Type of Process(es):
Primary	✓	bar screen & fine screens;
Secondary	✓	aeration basins w/RAS, anaerobic, anoxic & oxic chambers;
Tertiary	✓	sec clarifiers, alum precip[1], sand filters & post aeration

Method of Disinfection: Ultraviolet

Dechlorination ___ YES ✓ NO

[1]As needed

Effluent Discharge

Receiving Streams Names: W. Fork of White

Receiving Streams Classification: 4K of White River

Receiving Streams Use: primary contact; fishable/swimmable

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	2750 dry metric tons/yr.
___	Public Distribution	___ dry tons/yr.
___	Lagoon Storage	___ dry tons/yr.
___	Other (specify)	___ dry tons/yr.

List of toxic pollutant limits in NPDES permit: None

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for Paul R. Noland Treatment Plant.)

YES NO

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

Issuing Authority: *ADEQ*
Effective Date: *June 1, 2006*
Expiration Date: *May 31, 2011*
List pollutants that are specified in current sludge permit:
City's NPDES Permit (Part III.3) references 40 CFR 503

YES NO N/A

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

___ ✓ ___ Has there been a pattern of toxicity demonstrated by () effluent toxicity testing? If yes, explain what has been or is. being done about it. (eg. Is there an ongoing TRE?) *During the period from March 2005 to July 2009 the City performed 20 tests on the Pimephales promelas (Fathead Minnow) and 19 tests on the Ceriodaphnia dubia (Water Flea). During this period there were no Lethal or Sub-lethal failures for the minnows; however, during March 2007 there were both lethal and sub-lethal failures for the fleas. The City passed retests for both lethal and sub-lethal endpoints for the fleas.*

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

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

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

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.
BOD5 and TSS loadings have decreased with start-up of West WWTP.

YES NO N/A

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

✓ ___ ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?
If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated	Cause(s)
FCB	*O&M*

YES NO

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

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMIT/TREATMENT PLANT:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR0050288	*West Side WWTP*	*Dec 1, 2005*	*Nov 30, 2010*

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: *West Side WWTP*
Location Address: *113 West Mountain Street*

Expiration Date of NPDES Permit: *Nov 30, 2010*

Treatment Plant Wastewater Flow: Design- *10* MGD; Actual (Average)- *5.07* MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : *0* # of CIUs : *0*
Industrial Flow (mgd): *0.0* Industrial Flow (%) : *0.0* %

Level of Treatment		Type of Process(es):
Primary	✓	*bar screen & fine screens;*
Secondary	✓	*three stage biological treatment system;*
Tertiary	✓	*secondary clarification;*

Method of Disinfection: *Ultraviolet*

Dechlorination ___ YES ✓ NO

Receiving Streams Names: *Goose Creek, thence to the Illinios River, thence to the Arkansas River*

Receiving Streams Classification: *3J of Ark. River Basin*

Receiving Streams Use: *primary/secondary contact; fishable/swimmable*

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	488 dry metric tons/yr.
_____	Public Distribution	_____ dry tons/yr.
_____	Lagoon Storage	_____ dry tons/yr.
_____	Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: none

SECTION I: GENERAL INFORMATION

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

YES NO

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

Issuing Authority: *ADEQ*
Effective Date: *Dec 1, 2005*
Expiration Date: *Nov 30, 2010*

List pollutants that are specified in current sludge permit:
City's NPDES Permit (Part III.3) references 40 CFR 503

YES NO N/A

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

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

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

	Influent	Effluent	Sludge	Ambient
Metals *	3	3	1	
Priority **	1	1		
Biomonitoring		2		
TCLP			1	
Other:				

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

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.
Plant has just recently started-up and has no historical data

YES NO N/A

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

___ ✓ ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?
If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated	Cause(s)
N/A	

YES NO

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

SECTION I: GENERAL INFORMATION

C. Control Authority Pretreatment Program Modification [403.18]

YES	NO	
___	✓	Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]
___	✓	Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
	N/A	

2. Modifications in Progress: none

Date Requested	Nature of Modification
N/A	

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

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

Date of original Pretreatment Program approval: *4/26/84* [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: *4/7/98*
Date of most recent Pretreatment Program modification approval: *7/14/98*

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?

SECTION II: PRETREATMENT PROGRAM ANALYSIS

YES NO

___ ✓ Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

_____ No oversight authority
_____ No inspection authority
_____ No remedies for noncompliance
_____ No "equivalent" standard
_____ No clear delineation of responsibility for program implementation
_____ Interjurisdictional agreements not entered into
_____ Other, Specify: _____

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

✓ ___ 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 (P^2) policies by contributing jurisdictions?

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

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1. Greenland	0	0	Interjurisdic-
2. Farmington	0	0	tional
3. Elkins	0	0	Agreements

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

		Problems
___	Updating industrial waste survey	*None*
___	Notification of IUs	"
___	Permit issuance	"
___	Receipt and review of IU reports	"
___	Inspection and sampling of IUs	"
___	Assessment of IUs for P^2 activity	"
___	Analysis of samples	"
___	Enforcement	"
___	Other: _____	

Briefly describe other problems: *N/A*

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

IU Name	Problem	NPDES Permit Violation Yes	No
None		___	___

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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

YES	NO	
✓		Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
	✓	If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?
✓		Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
✓		If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2 reference materials to the IUs which qualify?

What methods are used to update the IWS:
- ✓ Review of newspaper/phone book
- ✓ Review of plumbing/building permits
- ✓ Review of water billing records
- ✓ Permit reapplication requirements
- ✓ Onsite inspections
- ✓ Citizen involvement
- ___ Other (specify) _____

How often is the survey to be updated? *every 3 years*

Are there any problems that the Control Authority has in identifying and categorizing SIUs: _____

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?

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

a.	9	SIUs (As defined by the Control Authority) [WENDB-SIUS]
b.	5	Categorical Industrial Users (CIUs) [WENDB-CIUS]
c.	4	Noncategorical SIUs
d.	2	Other regulated nonsignificant IUs (Describe) *septage haulers*
	11	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(t)(1)(i-ii)~~]

If not, the Control Authority has defined "significant industrial user" to mean: *The City has not updated its program to comply with the recent streamlining revisions; EPA has updated the definition of "significant industrial user" as shown in 403.3(v).*

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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

YES NO

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

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

What is the maximum term of the control mechanism? *2 yrs. for new users; 5 yrs. for renewal*

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

IU NAME	PERMIT EXPIRATION DATE
N/A	

YES NO

✓ ___ Does the Control Authority accept trucked septage wastes?

✓ ___ Does the Control Authority accept other trucked wastes?

___ ✓ Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

YES NO

N/A Does Control Mechanism designate a discharge point? [403.5(b)(8)]

N/A Are all applicable categorical standards and local limits applied to trucked wastes?

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

Pollutant	Limit
N/A	

Describe the discharge point(s) (including security procedures):
At the headworks through a locked gate with grab samples taken by an operator

YES NO

✓ ___ Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes? Traces of 1,4 dioxane coming from the U of A remediation site. Max of 4 -4000 gallon truckloads on a rainy day.

___ ✓ Does the Control Authority have a control mechanism for regulating wastes from UST sites?

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

Pollutant	Limit

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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?

Date Notified *'92,'98 & 08* Method of Notification *Letter*

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

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

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
N/A			

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?		SUO Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓	___	___	✓	✓	___	0.68
Cadmium (Cd)	✓	___	___	✓	✓	___	0.02
Chromium-Total	✓	___	___	✓	✓	___	0.48
Copper (Cu)	✓	___	___	✓	✓	___	0.23
Cyanide (CN)	✓	___	___	✓	✓	___	0.01
Lead (Pb)	✓	___	___	✓	✓	___	0.15
Mercury (Hg)	✓	___	___	✓	✓	___	0.0002
Molybdenum (Mo) *	___	___	___	✓	___	___	___
Nickel (Ni)	✓	___	___	✓	✓	___	0.20
Selenium (Se) *	___	___	___	✓	___	___	___
Silver (Ag)	✓	___	___	✓	✓	___	1.23
Zinc (Zn)	✓	___	✓[1] &	✓	✓	___	1.52

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

[1]Even though none of the pollutant loading exceeds or is close to exceeding the MAHL, the City has elected to start limiting some industrial loadings.

SECTION II: PRETREATMENT PROGRAM ANALYSIS

YES	NO	
___	✓	Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

POLLUTANT	Headworks Analysis Completed? Yes	No	Local Limits Needed? Yes	No	Local Limits Adopted? Yes	No	Numerical Limit Adopted (mg/l)
N/A							

YES	NO	
✓	___	Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

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

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

City uses either (1) the IU's historical data as an average plus 3 standard deviations as a mass limit (performance based) with the appropriate categorical concentration limit or (2) an allocated mass limit.

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? ___

West Side POTW is currently operating with no SIUs at this time

SECTION II: PRETREATMENT PROGRAM ANALYSIS

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Location In Approved Program
Inspections:			
CIUs	1	1/year	Part 3; SOP 3;VI-1
Other SIUs	1	1/year	"
Sampling:			
CIUs	1	1/year	Part 3; SOP 3;VI-3
Other SIUs	1	1/year	"
Reporting:			
CIUs	2	2/year	Ord Sec 51.079(D)
Other SIUs	2	2/year	"
Self-Monitoring:			
CIUs	2	2/year	Part 3;SOP 2;VI-3.6
Other SIUs	2	2/year	"

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

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

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

	Analytical Method *	Name of Laboratory
Metals	*Flame or Furnace*	*American Interplex*
Cyanide	*335.2*	*American Interplex*
Organics	*GC/MS*	*American Interplex*
Other	*Whole Effluent Toxicity*	*Univ. of Ark. Ecotoxicology*

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

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

SECTION II: PRETREATMENT PROGRAM ANALYSIS

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe:
The City has done splits and duplicates in the past with various contract labs, uses EPA's DMR blind samples and Water Performance studies

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

5 days Conventionals
> 1 wk Metals
2 wks Organics

✓ ___ Is there an established protocol clearly detailing sampling location and procedures?

___ ✓ Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: _____

_____

_____

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

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

YES NO

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

I. ENFORCEMENT

YES NO

___ ✓ Is the Control Authority definition of SNC consistent with EPA's? ~~[403.8(f)(2)(vii)]~~ [403.8(f)(2)(viii)]
The Control Authority program does not have Streamlining updates.

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

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

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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

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

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

✓ Imprisonment
✓ Termination of Service
_____ Other: _____

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

YES NO

✓ ___ When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]

✓ ___ Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].
Comment: _____

___ ✓ If no, does the Control Authority conduct all of the monitoring?

YES NO N/A

✓ ___ ___ Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? No
N/A					

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

#	%	
0	0	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [WENDB-MSNC]
0	0	Reporting requirements [WENDB-PSNC]
0	0	Pretreatment compliance schedule [WENDB-SSNC]

0 How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

SECTION II: PRETREATMENT PROGRAM ANALYSIS

YES NO

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

_____

_____

Has the Control Authority experienced any of the following:

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

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount	
Civil	0	$	
Administrative	0	$	
Total	0	$	[WENDB-IUPN]

SECTION II: PRETREATMENT PROGRAM ANALYSIS

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

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

Are the following files computerized:

YES NO

✓ ___ Control Mechanism Issuance
✓ ___ Inspection and Sampling schedule
✓ ___ Monitoring Data
✓ ___ IU Compliance Status Tracking
✓ ___ Other: inf/eff/sludge

Can IU monitoring data can be retrieved by:

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

✓ ___ Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]
___ ✓ Have IUs requested that data be held confidential?
How is confidential information handled by the Control Authority?

_____

_____

___ ✓ Are there significant public or community issues impacting the POTW's pretreatment program?
If yes, please explain: _____

_____

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

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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

(Pret Coor = 0.9) + (Proj Mgr = 0.1) + (3 X Lab Tech @ 0.2 each) = 1.6 FTEs

YES NO

___ ✓ Have any problems in program implementation been observed which appear to be related to inadequate funding?

If yes, describe and show below the source(s) of funding for the program:

N/A

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

✓ ___ Is funding expected to continue near the current level? If no, will it:

Increase ____ or Decrease ____

If no, describe the nature of the changes:

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

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

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	*3 automated Iscos and 2 Siqmas City uses Elkhart's Sampler for Flow Prop Composite*
✓	___	Safety equipment	*Standard list*
✓	___	Vehicles	*2 Vans*
✓	___	Analytical equipment	*Conventional equip and flame and furnace AA*

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.):
See Attachment I-1/2 for City's narrative of their P2 program(s).

2. Has the source of any toxic pollutants been identified? *No*
If yes, what was found?

3. Has the POTW implemented any kind of public education program? If yes, describe:
Presentations at local grade schools and university; periodic plant tours.

4. Does the POTW have any pollution prevention success stories for industrial users documented? *No*. If yes, please attach.

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
Yes, permits now require the assessment (see Attachment B-7/26)

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? *Yes*
If yes, which of the "Guides to Pollution Prevention" were used?*

**Municipal Pretreatment Program*
**Research & Educational Institutions*
**Metal Casting & Heat Treatment Industry*
**Metal Finishing Industry*
**Fabricated Metal Products Industry*
**Printed Circuit Board Manufacturing Industry*
**Paints & Coatings*
**Cleaning & Degreasing Process Changes*
**Alternative Metal Finishes*
**Alternative to Chlorinated Solvents for Cleaning & Degreasing*

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name *Superior Industries* File/ID No. *FAY09*
Industry Address *1901 Borick Drive, 72701*
Industry Description *Plating of aluminum wheels for the auto industry*
Industrial Category *Metal finishing* 40 CFR *433* SIC Code: *3471,3363,3479,3398*
Ave. Total Flow (gpd) *172,000* Ave. Process Flow (gpd) *170,000*
Industry visited during audit: *YES* *(479)443-7870*

Comments: *Aluminum casting of wheels also*

FILE #: 2 Industry Name *K D Tools Group* File/ID No. *FAY08*
Industry Address *2900 City Lake Rd, 72701*
Industry Description *Mfg. of automotive specialty hand tools*
Industrial Category *Metal Finishing* 40 CFR *433* SIC Code: *3423*
Ave. Total Flow (gpd) Ave. Process Flow (gpd) *9600*
Industry visited during audit: *YES*

Comments: *low & medium carbon steels*

FILE #: 3 Industry Name *Marshalltown Tools* File/ID No. *FAY10*
Industry Address *2200 Industrial Drive 72701*
Industry Description *Mfg hand tools for cement finishing business (trowels, floats)*
Industrial Category *Metal Finishing* 40 CFR *433* SIC Code: *3423*
Ave. Total Flow (gpd) *8,000* Ave. Process Flow (gpd) *4000*
Industry visited during audit: *YES*

Comments:

FILE #: 4 Industry Name *Pinnacle Foods* File/ID No. *FAY12*
Industry Address *1100 W. 15th street (PO Box 6) 72701*
Industry Description *Frozen food entrees (Meat, fruit, vegetables, desserts)*
Industrial Category *N/A* 40 CFR *N/A* SIC Code: *2038*
Ave. Total Flow (mgd) *1.3* Ave. Process Flow (mgd) *0.8*
Industry visited during audit: *YES*

Comments: 140 million lbs/yr of product

FILE #: 5 Industry Name *Elkhart Products* File/ID No. *FAY03*
Industry Address *3265 Hwy 71 S. 72701*
Industry Description *Mfg copper plumbing fittings & tubing*
Industrial Category *Copper forming* 40 CFR *468* SIC Code: *3498*
Ave. Total Flow (gpd) *1300* Ave. Process Flow (gpd) *500 (batch)*
Industry visited during audit: *YES*
Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

		Super	K D	Mltown	Pin	Elk
1.	Is the IU considered "significant" by the Control Authority?	Y	Y	Y	Y	Y
2.	Is the user subject to categorical pretreatment standards?	Y	Y	Y	N	Y
	a. New source or existing source (NS or ES)?	NS	ES	ES	N/A	ES
	b. Is this IU one identified as having P^2 potential?	Y	Y	Y	Y	Y

B. Control Mechanism

1.	Does the file contain an application for a control mechanism?	Y	Y	Y	Y	Y
	If yes, what is the application date?	11-30-07	05-30-06	11-03-08	03-01-05	04-16-08
	Does it ask for Pollution Prevention information?	N	N	N	N	N
2.	Does the file contain a Permit?	Y	Y	Y	Y	Y
	Permit Expiration Date?	10-31-13	08-31-11	11-30-13	05-31-10	08-31-13
	Is a fact sheet included?	Y[1]	Y[1]	Y[1]	Y[1]	Y[1]

Comments: *(1). The permit file contains a fact sheet for each permittee but the fact sheet was not included in the permit issued to the SIUs. (2). CP => "Cover Page" of permit (3). The permit does not contain specific language for "nontransferability" but in Part III Section A.8 the permit specifies conditions for "transfer". (4). The permit limits for some metal finishers (see attachment B-6/26) contain both categorical and "local limits". The City should list only the more stringent limit. (5). I.B => Part I Section B in the permit (6). The permit limits for Pinnacle includes limits on TSS (see attachment F-1/1); the City must not use "local limits" unless the limits have a "documented" technical basis. (7). The limits in Elkhart's permit show mass limits only; the City should include a fact sheet in the permit which shows the derivation of these limits (see attachment H). (8). The City has agreed to include the General/Specific prohibitions [40 CFR 403.5(a)(1) &(b)] in Part III -Standard Conditions in each permit.*

SECTION III: INDUSTRIAL USER FILE REVIEW

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

		Super	K D	Mltown	Pin	Elk
3.	Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
	a. Legal Authority Cite?	CP[2]	CP[2]	CP[2]	CP[2]	CP[2]
	b. Expiration date?	CP[2]	CP[2]	CP[2]	CP[2]	CP[2]
	c. Statement of nontransferability?	N[3]	N[3]	N[3]	N[3]	N[3]
	d. Appropriate discharge limitations?	N[4]	I.B[5]	I.B[5]	N[6]	Y[7]
	e. Appropriate self-monitoring requirements?	II.B	II.B	II.B	II.B	II.B
	f. Sampling frequency?	Y	Y	Y	Y	Y
	g. Sampling locations?	Y	Y	Y	Y	Y
	h. Requirement for flow monitoring?	II.A.5	II.A.5	II.A.5	II.A.5	II.A.5
	i. Types of samples (grab or composite) for self-monitoring?	I.B	I.B	I.B	I.B	I.B
	j. Applicable IU reporting requirements?	II.C	II.C	II.C	II.C	II.C
	k. Standard conditions for:					
	Right of Entry?	IV.A	IV.A	IV.A	IV.A	IV.A
	Records retention?	II.B.1	II.B.1	II.B.1	II.B.1	II.B.1
	Civil and Criminal Penalty provisions?	III.C.2	III.C.2	III.C.2	III.C.2	III.C.2
	Revocation of permit?	III.C.3	III.C.3	III.C.3	III.C.3	III.C.3
	l. Compliance schedules/ progress reports	II.C.2	II.C.2	II.C.2	II.C.2	II.C.2
	m. General/Specific Prohibitions?	N[8]	N[8]	N[8]	N[8]	N[8]
	n. Where technologically and economically achievable, are P[2] aspect included?	I.D.1	I.D.1	I.D.1	I.D.1	I.D.1

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Super	K D	Mltown	Pin	Elk
C. Application of Standards					
1. Has the IU been properly categorized?	Y[9]	Y	Y	Y	Y
2. Were both Categorical Standards and Local Limits properly applied?	N[4]	Y	Y	N[6]	Y
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	Y[11]	Y[11]	Y[11]	Y[11]	Y[11]
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A	N/A	N/A	N/A	Y
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	N/A	N/A	Y[12]	N/A	N/A
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	N/A	N/A	N/A	N/A	N/A
7. Is the Control Authority applying a bypass provision to this IU?	N	N	N	N	N
D. Compliance Monitoring Sampling					
1. Does the file contain Control Authority sampling results for the industry?	Y	Y	Y	Y	Y
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	Y	Y	Y	Y	Y

Comments: *(9). The City is to verify that Superior does not discharge any wastewater regulated by 40 CFR 464. (10). Superior's permit contains limits both categorical and "local limits". The City must list only the more stringent limit. (11). The City conducts annual Industrial Awareness Seminars. (12) Marshalltown's 40CFR433 limits have been adjusted in accordance with 40CFR403.6(e); see attachment D-1/1.*

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Super	K D	Mltown	Pin	Elk
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	Y	Y	Y	Y	Y
b. Sample date and time?	Y	Y	Y	Y	Y
c. Sample type?	Y	Y	Y	Y	Y
d. Wastewater flow at the time of sampling?	Y	Y	Y	Y	Y
e. Sample preservation procedures?	Y	Y	Y	Y	Y
f. Chain-of-custody records?	Y	Y	Y	Y	Y
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	Y	Y	Y	Y	Y
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	Y	Y	Y[12]	N/A	Y[13]
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Y	Y	Y	Y	Y[14]
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	Y	Y	Y	Y	Y

Comments: *(12) Marshalltown has "one" comprehensive plan which (according to the city) includes the TOMP; however, the plan does not provide specific details on TTO management (see attachment G). (13) Elkhart elected the O&G monitoring alternative; Elkhart has a "rope" skimming O&G removal system. (14). Elkhart has installed a new package treatment system with an equalization tank. The system runs "intermittently' and Elkhart (and the City) uses the industry owned 24-hour flow-proportional sampler. (15) "B" => Section B in the inspection report; see attachment C. (16) The inspection report did not contain a section for the "Evaluation of P2 Opportunities".*

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Super	K D	Mltown	Pin	Elk
Inspections					
7. Does the IU file contain inspection reports?	Y	Y	Y	Y	Y
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	Y	Y	Y	Y	Y
b. Date of last Inspection	12-04-08	12-09-08	12-16-08	12-18-08	12-12-08
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	B[15]	B[15]	B[15]	B[15]	B[15]
b. Inspection date and time?	B	B	B	B	B
c. Name and title of IU official contacted?	B	B	B	B	B
d. Verification of production rates?	N/A	N/A	N/A	N/A	D
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	E	E	E	E	E
f. Evaluation of pretreatment facilities?	H	N/A	H	H	H
g. Evaluation of self-monitoring equipment and techniques?	F	F	F	F	F
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	L	L	L	L	L
i. Manufacturing facilities?	A & D	A & D	A & D	A & D	A & D
j. Chemical handling and storage procedures?	I,J&K	I,J&K	I,J&K	N/A	I,J&K
k. Chemical spill prevention areas?	L	L	L	N/A	L
l. Hazardous waste storage areas and handling procedures?	I,J&K	I,J&K	I,J&K	N/A	I,J&K
m. Sampling procedures?	I & F	I & F	I & F	I & F	I & F
n. Laboratory procedures?	F	F	F	F	F
o. Monitoring records?	F	F	F	F	F
p. Evaluation of Pollution Prevention opportunities?	No[16]	No[16]	No[16]	No[16]	No[16]
q. Control Authority inspector signature?	Page 1	Page 1	Page 1	Page 1	Page 1

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Super	*K D*	*Mltown*	*Pin*	*Elk*
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	*Y*	*Y*	*Y*	*Y*	*Y*
11. Does the file include:					
a. BMR?	*Y*	*Y*	*Y*	*N/A*	*Y*
b. 90-Day Report?	*Y*	*Y*	*Y*	*N/A*	*Y*
c. All periodic reports?	*Y*	*Y*	*Y*	*Y*	*Y*
d. Compliance schedule reports?	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
12. Did the IU report on all required parameters?	*Y*	*Y*	*Y*	*Y*	*Y*
13. Did the IU comply with the required sampling frequency(s)?	*Y*	*Y*	*Y*	*Y*	*Y*
14. Did the IU report flow?	*Y*	*Y*	*Y*	*Y*	*Y*
15. Did the IU comply with the required reporting frequency(s)?	*Y*	*Y*	*Y*	*Y*	*Y*
16. For all SIUs, are self-monitoring reports signed and certified?	*Y*	*Y*	*Y*	*Y*	*Y*
17. Did the IU report all changes in its discharge? [403.12(j)]	*Y*[17]	*N/A*	*N/A*	*N/A*	*N/A*
18. Has the IU developed a Slug Control and Prevention Plan?	*Y*	*Y*	*Y*	*Y*	*Y*
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	*N*	*N*	*N*	*N*	*N*
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
b. Did POTW respond to the spill?	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*

Comments: *(17) Superior removed its chrome plating operation a few years ago.*

SECTION III: INDUSTRIAL USER FILE REVIEW

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

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

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Super	*K D*	*Mltown*	*Pin*	*Elk*
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	*N/A*	*N/A*	*N/A*	*Y*	*N/A*
b. TRC	*N/A*	*N/A*	*N/A*	*Y*	*N/A*
c. Pass through/Interference	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
d. Spill/slug loads	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
e. Reporting	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
f. Compliance schedule	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
g. others (specify)	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
13. Was the SIU published for SNC?	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
Date of publication.	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Fayetteville NPDES #: AR0020010
Date of Audit: Oct 19-22, 2009 Date entered into QNCR: Oct 29, 2009
(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.

10-29-09

ICIS NPDES: Add Inspection - Windows Internet Explorer

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

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check AutoLink AutoFill Send to Settings

ICIS NPDES: Add Inspection

Page Tools

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

Compliance Monitoring Activity Name: City of Fayetteville AR 09 2009 10

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

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

* Linked Facility

FACILITIES

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	AR0020010	VALIDATE		

Compliance Monitoring Dates

Planned Start Date: 10/19/2009

Planned End Date: 10/22/2009

Actual Start Date: 10/19/2009

Actual End Date: 10/22/2009

Statutes and Sections Information

Federal Statutes : CWA - Clean Water Act

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

State Statute:

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

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

Compliance Monitoring Agency Name:

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

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

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

Which party had the lead?:

Government Contacts

CONTACTS

Affiliation Type	First Name	Last Name	Phone	Office	Organization

Codes

SIC Codes: 4952 Sewerage Systems

ADD / REMOVE

NAICS Codes:

ADD / REMOVE

Priorities

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

Regional Priority: 2009 - Region 06 - Air Toxics Major Sources (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: 4

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome: No Violations

Compliance Monitoring Rating Code: Satisfactory

Compliance Monitoring Comments

Compliance Monitoring Comments: 006: Significant Industries Site Visits Conducted

User Defined Fields

1: ☐

Trusted sites 100%

ICIS NPDES: Add Inspection - Windows Internet Explorer

https://icis.epa.gov/icis/inspection/AddSpecialPrograms.do

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check AutoLink AutoFill Send to Settings

ICIS NPDES: Add Inspection

Page Tools

Integrated Compliance Information System NPDES

HOME
HELP
LOGOUT

Special Programs

Pretreatment

Significant Industrial Users (SIUs)

SIUs :	9
SIUs Without Control Mechanism :	Ø
SIUs Not Inspected :	Ø
SIUs Not Sampled :	Ø
SIUs in SNC with Pretreatment Standards :	Ø
SIUs in SNC with Reporting Requirements :	Ø
SIUs in SNC with Pretreatment Schedule :	Ø
SIUs in SNC Published in Newspaper :	Ø
SIUs on Schedules :	Ø
Violation Notices Issued to SIUs :	1
Administrative Orders Issued to SIUs :	Ø
Civil Suits Filed Against SIUs :	Ø
Criminal Suits Filed Against SIUs :	Ø

Categorical Industrial Users (CIUs)

CIUs :	5
CIUs in SNC :	Ø

Penalties

Dollar Amount of Penalties Collected :	$ Ø
Industrial Users (IUs) from which Penalties have been collected :	Ø

Other Information

SUO Reference :	51.070
SUO Date :	04/07/1998
Annual Pretreatment Budget :	$
Pass-Through/Interference Indicator :	
Violation of IU Schedule for Remedial Measures :	No
Formal Response to Violation of IU Schedule for Remedial Measures :	

Local Limits

Date of Most Recent Technical Evaluation for Local Limits :	10/01/2009
Date of Most Recent Adoption of Technically Based Local Limits :	04/07/1998
Local Limit Pollutants :	Ar, Ca, Cr, Cu, CN, Pb, Hg, Ni, Ag, Zn

POLLUTANTS

Removal Credits

Removal Credits Application Status :	Not Applicable
Date of Most Recent Removal Credits Approval :	
Removal Credits :	

POLLUTANTS

Acceptance of Waste

Acceptance of Hazardous Waste :	No
Acceptance of Non-Hazardous Industrial Waste :	No
Acceptance of Hauled Domestic Wastes :	No

Deficiencies

Deficiencies Identified During IU File Review :	No
Control Mechanism Deficiencies :	No
Legal Authority Deficiencies :	No
Deficiencies in Data Management and Public Participation :	No
Deficiencies in Interpretation and Application of Pretreatment Standards :	No
Inadequacy of Sampling and Inspections :	No
Adequacy of Pretreatment Resources :	Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling :	4
Annual Frequency of Effluent Toxicant Sampling :	4
Annual Frequency of Sludge Toxicant Sampling :	1

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

EPA U.S. Environmental Protection Agency

Trusted sites 100%

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Name, address and phone number of industry:
Superior Industries, 1901 Borick Dr., (479) 443-7870

Type of industry: *CFR 433 Mfg of Al wheels for the auto ind.*

Date/Time of visit: *October 21, 2009 @ 8:00 am*

Industry contacts: *Lynn Pate, Cor Environmental Mgr*
Bill Koch, Env Technician

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

Comments: *(1) The City is to verify the status of 40 CFR 464 Metal Molding & Casting (MM&C) operations at this site. The City is to confirm that Superior does not discharge any MM&C wastewater to the POTW.*

Visit conducted by: *Torrence/Georgiou* Date: _____

_____

(signature of auditor conducting visit)

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

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Industry name: *Superior*

Additional comments:

Superior performs a non-chrome coating operation on this site which falls under 40 CFR 433. This Industrial User also perform aluminum die casting on site. Superior melts ingots in furnaces and pours the molten metal into dies to form the rough cast wheel.

Pretreatment consists of oil skimming, (at present, still segregation of old waste streams, chrome reduction, chemical precip., filter press and pH adjust prior to discharge). Most of the water generated at this time is from the clean/rinse waters from the post-polishing operations which would be considered ancillary ops under CFR 433.

Visit conducted by: *Torrence/Georgiou* Date: _____

_____

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Name, address and phone number of industry:
Elkhart Products, 3265 Hwy. 71 S., (479) 443-2367

Type of industry: *CFR 468 Mfg. Cu tubing & fittings*

Date/Time of visit: *October 21, 2009 @ 1:30 pm*

Industry contacts: *Craig Goodis, Mgr. Engineering, et al and David Bailey*

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

Comments: *(1) Elkhart has a 24-hour flow proportional sampler installed. The City uses the same sampler and has a "lock-out" procedure to prevent tampering when the City is using the sampler.*
(2) Elkhart appears to be proactive in understanding pretreatment requirements.

Visit conducted by: *Torrence/Georgiou* Date: _____

_____
(signature of auditor conducting visit)

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

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Industry name: *Elkhart*

Additional comments:

(3) *Elkhart melts copper plates to cast and draw copper tubing. The Fayetteville facility appears to fall under both 40 CFR 464 Subpart B(Copper Casting) and 40 CFR 468 Subpart A (Copper Forming). The City should considered both categories when calculating limits for this facility.*

If no wastewater is associated with the Copper Casting operations, the City may consider only appropriate operations under Copper Forming when calculating limits for this facility.

Visit conducted by: *Torrence/Georgiou* Date: _____

_____

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Name, address and phone number of industry:
Marshalltown Tools, 2200 Industrial Dr., (479) 521-8787 (X150)

Type of industry: *CFR 433 Concrete finishing hand tools*

Date/Time of visit: *October 21, 2009 @ 9:30 am*

Industry contacts: *Robert O'Connell/Mgr of Mfg. Engineering*

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

Comments: *(1) Marshalltown has a small etching operations to imprint its logo into some tools. The etching is a core operation under 40 CFR 433.*

Visit conducted by: *Torrence/Georgiou* Date: _____

_____

(signature of auditor conducting visit)

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

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Industry name: *Marshalltown Tools*

Additional comments:

The facility's main product is cement finishing equipment: trowels, floats and taping knives.

The facility removed the phosphatizing operation but the small etching operation causes the facility to remain under 40 CFR 433.

Visit conducted by: *Torrence/Georgiou* Date: _____

_____

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Name, address and phone number of industry:
Danaher (K-D Tool Group), 2900 City Lake Road; (479) 442-7779

Type of industry: *CFR 433 Specialty automotive hand tools*

Date/Time of visit: *October 21, 2009 @ 10:30 am*

Industry contacts: *Clay Bradshaw, EH&S Coor*
Gary Young, Env Tech

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

Comments: *(1) At the time of the audit, the City had Danaher (K-D Tool) listed as a SIU. However, doing the site visit the auditor confirmed that Danaher is closing the Fayetteville facility and combing the Fayetteville operations with those located in Springdale, AR.*

Visit conducted by: *Torrence/Georgiou* Date: _____

_____
(signature of auditor conducting visit)

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

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*
Industry name: *K-D (Danaher) Tool Group*

Additional comments:

This facility machines and coats steel cast forms to make the finished tools. Some cast parts are also zinc and aluminum.

Danaher perform zinc plating and black oxidizing in the Fayetteville facility. These two operations are core processes under 40 CFR 433.

Visit conducted by: *Torrence/Georgiou* Date: _____

_____

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Name, address and phone number of industry:
Custom Powder Coatings Inc., 1629 Farmington Rd, (479) 251-0500

Type of industry: *CFR 433 Phosphatizer prior to powder coat*

Date/Time of visit: *October 21, 2009 @ 12:30 pm*

Industry contacts: *Angela Stephans, President & Owner*

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

Comments: *(1) Custom Powder has a standard 3 stage iron phosphatizing operation which falls under 40 CFR 433. This facility is a "Job Shop" but is a "New Source"; therefore, 40 CFR 413 is not applicable.*

Visit conducted by: *Torrence/Georgiou* Date: _____

_____

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Industry name: *Custom Powder Coatings*

Additional Comments:

The auditor did not review the file for this industry but decided to conduct a site visit to follow up on comments discussed during the last audit site visit in Nov 2006 and the Pretreatment Compliance Inspections conducted in Nov 2007 and Dec 2008. Comments included discussion on TTOs, "unpermitted discharge" and other pretreatment concerns.

Visit conducted by: *Torrence/Georgiou* Date: _____

_____

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*

Name, address and phone number of industry:
Pinnacle Foods Corporation, 100 W 15th St. (479) 443-3451

Type of industry: *Frozen food entrees (Meat, fruit, etc.)*

Date/Time of visit: *October 21, 2009 @ 3:00 pm*

Industry contacts: *Bill Medley, EH&S Mgr*

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

Comments: *(1) Pinnacle discharges over a million gallons of wastewater each day to the sewer system.*

(2) Pinnacle has a DAF unit to reduce BOD loading to the POTW.

Visit conducted by: *Torrence/Georgiou* Date: _____

_____
(signature of auditor conducting visit)

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

Control Authority: *City of Fayetteville* NPDES #: *AR0020010*
Industry name: *Pinnacle*

Additional comments:

The Fayetteville location packages food for "Hungry Man", "Swanson Dinners", macaroni and cheese for Kentucky Fried Chicken, et. al.

Pinnacle looked into flow reduction to reduce the hydraulic loading to the POTW but the FDA has guidelines on minimum water rates.

Visit conducted by: *Torrence/Georgiou* Date: _____

_____

(signature of auditor conducting visit)

City of Fayetteville
Wastewater Survey Questionnaire - Long Form

For Office Use Only
No. _____
Use as application Y / N

1. Company Name: Superior Industries Int'l Inc. – Fayetteville

   Mailing Address: 1901 East Borick Drive, Fayetteville, AR 72701

   Telephone: 479-443-7870 x6331

2. Address of Facility (if same as above, check [X]):

   _____

   _____

   Telephone: (if same as above, check [X]): _____

3. Contact Person: Garnett Wise

   Title: Environmental Manager Telephone: 479-443-7870 x6331

4. Operator(s): Superior Industries Int'l Inc.

5. Owner(s): Superior Industries Int'l Inc.

6. Identify type of business conducted or product(s) manufactured:

   Aluminum wheel manufacturing

   _____

7. Does this company have an industrial waste discharge permit with the City of Fayetteville or has it had one previously? Check one: [X] yes [ ] no

   If yes, permit number/expiration date: FAY09 2/29/2008

8. List other discharge or environmental permits (NPDES, Air, etc.): Air: 1302-AOP-R10,

   Stormwater: ARR00B109

9. Standard Industrial Classification Code Number(s) and Classification(s) (if known):

   3714 "Motor Vehicle Parts and Accessories"

10. Are your manufacturing or commercial operations subject to national categorical pretreatment standards? Check one: [X] yes [ ] no

If yes, identify regulated process(es) and specify applicable standards:

Metal Finishing 40CFR 433

11. Are the applicable national categorical pretreatment standards and the local discharge prohibitions and limitations being met on a consistent basis?
Check one: [X] yes [ ] no

If no, specify whether additional operation and maintenance and/or additional pretreatment is required to meet standards:

12. Quantity of Water Consumption:

Average Total Monthly Water Consumption (gallons) 6,900,000

Average Gallons Water Consumed in Products daily 0

13. Types/Amounts of wastes generated by this facility: (check all that apply)

Type	Average gallons per day	Estimated	Measured
[X] Domestic wastes (restrooms, showers, etc.)	20,000	[X]	[ ]
[X] Cooling water, non-contact	8,000	[X]	[ ]
[X] Cooling water, contact	22,000	[X]	[ ]
[X] Boiler/Tower blowdown	2,000	[X]	[ ]
[X] Process	9,000	[X]	[ ]
[X] Regulated process	133,000	[X]	[ ]
[X] Equipment/Facility washdown	negligible	[X]	[ ]
[X] Air Pollution Control Unit	36,000	[X]	[ ]
[X] Storm water runoff to sewer	negligible	[X]	[ ]
[ ] Other _____	_____	[ ]	[ ]

Total wastewater discharged 230,000 gallons per day
Estimated wastewater discharge in 5 years 230,000 gallons per day

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14. Wastes are discharged to (check all that apply):

Type	Average/Maximum gallons per day	Estimated	Measured
[X] Sanitary sewer	180,000 avg / 300,000 max	[X]	[ ]
[ ] Storm sewer		[ ]	[ ]
[ ] Surface water		[ ]	[ ]
[ ] Ground water		[ ]	[ ]
[X] Liquid waste hauler	200 avg / 20,000 max	[X]	[ ]
[X] Evaporation	50,000 avg / 75,000 max	[X]	[ ]
[ ] Other _____		[ ]	[ ]

Provide name and address of waste hauler(s), if used.

Siemens, Little Rock, AR

Triad Transport, McAlister, OK

15. Attach sketch(es) of general plant process and waste line layouts including location of floor drains and manholes. Include any existing or proposed pretreatment systems and locations and sizes of all existing and proposed connections to the POTW wastewater collection system. Also include details of present and/or proposed monitoring facilities.

16. Describe Processes, Products, and Raw Materials. The following information must be completed for each product line.

- General description of processes for each product line.

  See attached Process Descripton.

- General description of products produced by type and average rate of production. Please specify if produced seasonally.

  Products are OEM (original equipment manufacturer) aluminum wheels for cars trucks. Production rates ranged from roughly 35,000 to 70,000 wheels per week in 2006 (not necessarily representative of production capacity). Typically there is a one or two week shutdown each summer and one week in late December. Production varies with customer demand.

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- General description of type and amount of raw materials or process additive used.

  Aluminum (approx. 70,000,000 pounds melted in 2006, not representative of production capacity); multiple "pretreatment" chemicals (soaps, acids, etch, conversion coatings, additives, etc.); multiple process chemicals (acids, caustics, boiler & cooling tower treatments, lab supplies, paints).

☐ Process discharge is [ ] batch [ ] continuous [X] both.
If both, 10 % batch 90 % continuous.
Average number of batches per 24-hour day 5.

17. Describe hours of operation and number of employees per shift. Specify seasonal variances.

1st shift approx. 7:00am – 3:00pm, Monday-Friday (@500 employees),
2nd shift approx. 3:00pm – 11:00pm, Monday-Friday (@300 employees),
3rd shift approx. 11:00pm – 7:00am, Monday-Friday (@200 employees),
4rd shift approx. 6:00am – 6:00pm, weekends (@100 employees).

18. Describe hours of operation of actual or proposed pretreatment facility. Specify discharge hours.
Batch treatment and discharges, such as tank neutralizations and dumps, are typically done on weekends, depending on production schedules. Continuous rinse tank overflows and periodic process water bleeds, etc., will effectively flow 24/7 through wastewater clarifiers.

19. Are any process changes or expansions planned during the next five years? Check one:
[ ] yes [X] no

If yes, describe the nature of planned changes or expansions (attach extra sheet if necessary):

20. If your facility employs processes in any of the industrial categories or business activities listed below and any of these processes generate wastewater or waste sludge, place a check beside the category or business activity (check all that apply):

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Industrial Categories

[ ] Adhesives
[X] Aluminum Forming
[ ] Auto & Other Laundry
[ ] Battery Manufacturing
[ ] Coal Mining
[ ] Coil Coating
[ ] Copper Forming
[ ] Electrical/Electronic Components
[ ] Electroplating
[ ] Explosives Manufacturing
[X] Foundries
[ ] Gum & Wood Chemicals
[ ] Inorganic Chemicals
[ ] Iron and Steel Manufacturing
[ ] Leather Tanning and Finishing
[ ] Mechanical Products
[X] Metal Finishing
[ ] Metal Products & Machinery
[ ] Nonferrous Metals
[ ] Ore Mining
[ ] Organic Chemicals
[ ] Paint & Ink
[ ] Pesticides
[ ] Petroleum Refining
[ ] Pharmaceuticals
[ ] Photographic Supplies
[ ] Plastic & Synthetic Materials
[ ] Plastics Processing
[ ] Porcelain Enameling
[ ] Printing & Publishing
[ ] Pulp and Paper
[ ] Rubber Processing
[ ] Soaps/Detergents Mfg.
[ ] Steam Electric
[ ] Textile Mills
[ ] Timber Products Mfg.

Other Business Activities

[ ] Animal/Vegetable Fats/Oils Blending
[ ] Asbestos Manufacturing
[ ] Auto Garage/Repair
[ ] Beverage Bottler
[ ] Breads/Baked Goods Mfg.
[ ] Brewery/Winery
[ ] Builder's Paper
[ ] Carbon Black
[X] Car Wash/Transport Truck Wash
[ ] Cement Manufacturing
[ ] Dairy Products Processing
[ ] Feedlots
[ ] Ferroalloy Manufacturing
[ ] Fertilizer Manufacturing
[ ] Fruits and Vegetables
[ ] Glass Manufacturing
[ ] Grain Mills Manufacturing
[ ] Hospital/Health Care
[ ] Ink Formulating
[ ] Meat Processing
[X] Metal Molding and Casting
[ ] Paint and Body Shop
[ ] Paint Formulating
[ ] Phosphate Manufacturing
[ ] Paving and Roofing (Tars and Asphalt)
[ ] Poultry Processing
[ ] Radiator Shop
[ ] Rendering
[ ] Slaughter/Meat Packing
[ ] Seafood Processing
[ ] Sugar Processing
[ ] Other Food/Edible Products Processor

21. Describe pretreatment devices or processes used for treating wastewater or sludge (check all that apply).

[ ] Air flotation
[ ] Biological treatment
[ ] Centrifuge
[ ] Chemical precipitation
[ ] Chlorination

Describe: _____

[ ] Cyclone
[X] Filtration – DUST COLL.;
[X] Flow equalization – DW06 – antifoam + meter out slowly
[X] Grease or oil separation Describe: Limited oil/water separation capabilities
[ ] Grease trap Frequency of cleaning: ____________
[ ] Grit removal
[ ] Ion exchange
[X] Neutralization/pH correction Describe: High/low pH tanks are batch neutralized – other small batches
[ ] Ozonation
[ ] Rainwater diversion or storage Describe: ____________
[ ] Reverse Osmosis
[ ] Screen
[X] Sedimentation – underground clarifiers + 4-stage pit in bright polish area.
[ ] Septic tank
[ ] Solvent separation
[ ] Sump
[ ] Other chemical treatment Describe: ____________
[ ] Other physical treatment Describe: ____________
[ ] Other Describe: ____________
[ ] No pretreatment provided.

Air compressor near caustic area

Wheel plant degreaser + etch tank rinse

Other remarks as needed to describe any of the above:

____

____

____

22. If any wastewater analyses have been performed on the wastewater discharge(s) from your facilities, attach a copy of the most recent data to this questionnaire. Include the date of the sample collection and analysis, name of laboratory performing the analysis, and location(s) from which samples(s) were taken (attach sketches, plans, etc., as necessary).

23. Are any liquid wastes or sludges from this facility disposed of by means other than discharge to the POTW collection system? Check one: [X] yes [ ] no

If yes, these wastes may be best described as:

	Estimated gallons/pounds per year (specify)
[X] Acids and alkalies	7,000 gal/yr (spent caustic)
[ ] Heavy metal sludges	
[ ] Inks/dyes	
[X] Non-petroleum oil and/or grease	5,600 gal/yr (non-haz waste)
[X] Organic compounds	50 lb/yr (hazwaste)
[X] Paints	98,000 lb/yr (non-haz scrap)

[ ] Pesticides _____

[X] Petroleum oil and/or grease 65,000 gal/yr (used oil recycler)

[ ] Plating wastes _____

[ ] Pretreatment sludges _____

[ ] Radiator fluid wastes _____

[X] Solvents/thinners 2,000 gal/yr (hazwaste)

[ ] Other hazardous wastes
Specify: _____ _____
_____ _____

[ ] Other non-hazardous wastes
Specify: _____ _____
_____ _____

For the above checked wastes, does your company practice:

[X] on-site storage. Describe: Containerized non-haz and/or hazwaste storage

[ ] off-site storage. Describe: _____

[X] on-site disposal. Describe: Neutralization and discharge

[X] off-site disposal. Describe: Wastes shipped to appropriate recycling/disposal facilities

24. Is there an Accidental Spill/Slug Prevention Plan prepared for this facility?
Check one: [X] yes [ ] no If yes, attach a copy to this application.

25. Priority Pollutant Information. Please indicate by placing an "x" in the appropriate box by each listed chemical whether it is "suspected to be absent," "known to be absent," "suspected to be present," or "known to be present" in your manufacturing or service activity or generated as a by-product. Specify maximum discharge concentration for those chemicals known or suspected present.

Item No.	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present	Max Daily Concentration
1	ammonia	--				
2	asbestos (fibrous)	X				
3	cyanide (total)	X				
4	antimony (total)	X				
5	arsenic (total)	X				
6	beryllium (total)	X				
7	cadmium (total)	X				
8	chromium (total)	X				
9	copper (total)	X				
10	lead (total)	X				
11	mercury (total)	X				
12	nickel (total)	X				
13	selenium (total)	X				
14	silver (total)	X				
15	thallium (total)	X				
16	zinc (total)	X				
17	acenaphthene	X				
18	acenaphthylene	X				
19	acrolein	X				

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Item No.	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present	Max Daily Concentration
20	[illegible]	X				
21	aldrin	X				
22	anthracene	X				
23	benzene	X				
24	benzidine	X				
25	benzo(a)anthracene	X				
26	benzo(a)pyrene	X				
27	benzo(b)fluoranthene	X				
28	benzo(g,h,i)perylene	X				
29	benzo(k)fluoranthene	X				
30	a-BHC(alpha)	X				
31	b-BHC(beta)	X				
32	d-BHD(delta)	X				
33	g-BHC(gamma)	X				
34	bis(2-chloroethyl)ether	X				
35	bis(2-chloroethoxy)methane	X				
36	bis(2-chloroisopropyl)ether	X				
37	bis(chloromethyl)ether	X				
38	bis(2-ethylhexyl)phthalate	X				
39	bromodichloromethane	X				
40	bromoform	X				
41	bromomethane	X				
42	4-bromophenylphenyl ether	X				
43	butylbenzyl phthalate	X				
44	carbon tetrachloride	X				
45	chlordane	X				
46	4-chloro-3-methylphenol	X				
47	chlorobenzene	X				
48	chloroethane	X				
50	chloroform	X				
51	chloromethane	X				
52	2-chloronaphthalene	X				
53	2-chlorophenol	X				
54	4-chlorophenylphenyl ether	X				
55	chrysene	X				
56	4,4'-DDD	X				
57	4,4'-DDE	X				
58	4,4'-DDT	X				
59	dibenzo(a,h)anthracene	X				
60	dibromochloromethane	X				
61	1,2-dichlorobenzene	X				
62	1,3-dichlorobenzene	X				
63	1,4-dichlorobenzene	X				
64	3,3-dichlorobenzidine	X				
65	dichlorodifluoromethane	X				
66	1,1-dichloroethane	X				
67	1,2-dichloroethane	X				
68	1,1-dichloroethene	X				
69	trans-1,2-dichloroethene	X				
70	2,4-dichlorophenol	X				
71	1,2-dichloropropane	X				
72	(cis & trans) 1,3-dichloropropene	X				
73	dieldrin	X				
74	diethyl phthalate	X				
75	2,4-dimethylphenol	X				
76	dimethyl phthalate	X				
77	di-n-butyl phthalate	X				
78	di-n-octyl phthalate	X				
79	4,6-dinitro-2-methylphenol	X				
80	2,4-dinitrophenol	X				
81	2,4-dinitrotoluene	X				
82	2,6-dinitrotoluene	X				
83	1,2-diphenylhydrazine	X				
84	endosulfan I	X				

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Item No.	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present	Max Daily Concentration
85	endosulfan II	--				
86	endosulfan sulfate	X				
87	endrin	X				
88	endrin aldehyde	X				
89	ethylbenzene	X				
90	fluoranthene	X				
91	fluorene	X				
93	heptachlor epoxide	X				
94	hexachlorobenzene	X				
95	hexachlorobutadiene	X				
96	hexachlorocyclopentadiene	X				
97	hexachloroethane	X				
98	indeno (1,2,3-d)pyrene	X				
99	isophorone	X				
100	methylene chloride	X				
101	naphthalene	X				
102	nitrobenzene	X				
103	2-nitrophenol	X				
104	4-nitrophenol	X				
105	n-nitrosodimethylamine	X				
106	n-nitrosodipropylamine	X				
107	n-nitrosodiphenylamine	X				
108	PCB-1016	X				
109	PCB-1221	X				
110	PCB-1232	X				
111	PCB-1242	X				
112	PCB-1248	X				
113	PCB-1254	X				
114	PCB-1260	X				
115	pentachlorophenol	X				
116	phenanthrene	X				
117	phenol	X				
118	pyrene	X				
119	2,3,7,8-tetrachlorodibenzo-p-	X				
120	1,1,2,2-tetrachloroethane	X				
121	tetrachloroethane	X				
122	toluene	X				
123	toxaphene	X				
124	1,2,4-trichlorobenzene	X				
125	1,1,1-trichloroethane	X				
126	1,1,2-trichloroethane	X				
127	trichloroethene	X				
128	trichlorofluoromethane	X				
129	2,4,6-trichlorophenol	X				
130	vinyl chloride	X				

This is to be signed by an authorized representative of your firm and certified to by a qualified professional after completion of this form and review of the information by the signed official.

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 upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signed: Date: 11/30/07 Signature:

Name/Title: Garnett Wise, Environmental Manager

Certified: Date: 11/30/07 Signature: Garnett Wise

Name/Title: Garnett Wise, Environmental Manager

Submit the completed questionnaire to: **City of Fayetteville Noland WWTP**
ATTN: Industrial Pretreatment Coordinator
1400 N. Fox Hunter Road
Fayetteville, AR 72701

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PILE COPY

SUPERIOR INDUSTRIES INTERNATIONAL, INC.
1901 BORICK DRIVE • FAYETTEVILLE, AR 72701
(479) 443-7870 • FAX (479) 443-4522

By Certified Mail: 7006 3450 0000 8514 9972, Return Receipt Requested

November 30, 2007

Denise Georgiou
Industrial Pretreatment Coordinator
City of Fayetteville Noland WWTP
1400 North Fox Hunter Road
Fayetteville, AR 72701

Re: Application for Renewal of Permit #FAY09

Dear Denise,

Enclosed is the application package to renew Superior's wastewater discharge permit and attachments, plus the application fee form and a check for the $500 application fee.

There are many changes from the existing permit, most notably the elimination of the plating process and related waste treatment operation, so don't hesitate to contact me with any questions or for any additional information, at 443-7870 x6331, cell 841-6706, or gwise@supind.com.

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

Sincerely,

Garnett Wise

Garnett Wise
Environmental Manager

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Filename: j:\Environmental\Wastewater\OMI permit renewal cover.doc

Fax
Deliver
Rec'd Postmark 07-DEC-07 Data Entry _____ NOV ___

FILE COPY

CITY OF FAYETTEVILLE, ARKANSAS
INDUSTRIAL WASTE DISCHARGE PERMIT

PERMIT NO. FAY09

Superior Industries International, Inc. has been classified as a new source 40 CFR 433 Metal Finisher under Subpart A (Metal Finishing) because of the conversion coating and etch processes. In compliance with the provisions and conditions of the Discharge and Pretreatment Regulations in Chapter 51 of the Fayetteville Code, of 40 CFR 433, and with any applicable provisions of local, federal or State of Arkansas laws or regulations,

Superior Industries International Arkansas, LLC
1901 Borick Drive
Fayetteville, AR 72701,

hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC No. 3714 from premises located at the above address and through outfalls identified herein to the City of Fayetteville's POTW collection system in accordance with effluent limitations, monitoring requirements, compliance schedule, reporting requirements, and conditions set forth in this permit and in the Discharge and Pretreatment Regulations in Chapter 51 of the Fayetteville Code.

Noncompliance with any term or condition of this permit shall constitute a violation of the Fayetteville Code.

This permit shall become effective on **November 1, 2008** and authorization to discharge shall expire at midnight on **October 31, 2013.** The duration of this permit shall not exceed 5 years. This permit shall be transferred from Superior Industries International, Inc. to Superior Industries International Arkansas, LLC effective on **December 29, 2008**.

If the Permittee wishes to continue discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with requirements of the Discharge and Pretreatment Regulations subchapter of the Fayetteville Code, a minimum of 90 days prior to the expiration date.

Signed this 29th day of December 2008

Approved By: _____
David Jurgens, P.E.
Water and Wastewater Director
City of Fayetteville

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PART I - SPECIFIC CONDITIONS, LIMITATIONS, AND REQUIREMENTS

SECTION A. WASTESTREAM LOCATIONS

Location 001

Location 001 was re-piped so no wastewater goes through it. The paint room wastes now flow directly to Location 003. Location 001 shall be a sampling well that is a 4-inch vent in the discharge pipe from the clarifier that is located underground approximately seventy-five feet from the west wall of the mold shop. There are no specific requirements in this permit regarding this wastestream.

Location 002

This wastestream shall consist of sanitary wastewater from the offices. Location 002 shall be in the manhole in the parking lot between the first and the second parking spot east of the main entrance driveway. There are no specific requirements in this permit regarding this wastestream.

Location 003

This wastestream shall consist of the process-generated wastewater from the paint room, premelt, heat treat, and clear coat room. Location 003 shall be after the throat of the 3" Parshall flume that is located approximately 60 feet west and 20 feet north of the northeast corner of the clear coat paint room. There are no specific requirements in this permit regarding this wastestream.

Location 004

Location 004 was decommissioned in plant modifications in 2006 along with the cyanide processes. This wastestream consisted of the treated wastewater from the cyanide destruct unit before mixing with other wastestreams. Location 004 was a valve on a support column in the waste treatment area just east of the overhead door on the south side of the room. This wastestream and location no longer exists so there are no specific requirements in this permit regarding this wastestream.

Location 005

This wastestream shall consist of wastewater from all processes. It shall include wastestreams from Locations 003 and 006. It shall also include sanitary wastewater from Location 002. Location 005 shall be in the Parshall flume in the manhole approximately 420 feet north of the east building, next to the sampling shed. The quality of the effluent discharged from Location 005 shall, at a minimum, meet the limitations as set forth in Table I-1.

Location 006

The electroplating processes were decommissioned in 2006. This wastestream consisted of the treated wastewater from all electroplating process-generated wastestreams including wastewater

from Location 004. Currently, this wastestream consists of bright polish and clear coat process waste. Location 006 shall be after the throat of the 3" Parshall flume that is located approximately 8 feet north of the north wall of the electroplating plant. There are no specific requirements in this permit regarding this wastestream.

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to discharge from **Location 005** except for flow usage which applies as specified in the Table I-1 footnotes. The Permittee shall monitor the discharge from **Location 005**, and the incoming water usage, and shall be limited as specified below:

Table I-1

Parameter	LIMITATIONS[1]			MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average[2]	Frequency[3]	Sample Type
	(mg/l)	(lb./day)	(mg/l)		
Cadmium, total	0.10	0.02	0.06	2/month	24-hr composite
Chromium, total	2.41	0.32	1.49	2/month	24-hr composite
Copper, total	2.94	0.69	1.80	2/month	24-hr composite
Lead, total	0.60	0.05	0.37	2/month	24-hr composite
Nickel, total	3.46	0.52	2.07	2/month	24-hr composite
Silver, total	0.37	0.004	0.21	2/month	24-hr composite
Zinc, total	2.27	0.64	1.29	2/month	24-hr composite
Cyanide, total	1.04	0.06	0.57	1/6 months	Grab
TTO, 40 CFR 433	1.85	-	-	NA	Certification[4]
Flow, Usage[5]	Report		Report	Continuous	Totalizer[6]
Flow, Discharge	Report		Report	Continuous	Totalizer[6]

[1] It is the Permittee's responsibility to ensure test detection levels are sufficiently low to demonstrate compliance with permit limitations. If an analytical result is below the laboratory detection limit, then the detection limit shall be used in the calculation of pounds unless permitted otherwise by the Control Authority. The EPA recommends the following detection limits in **micrograms** per liter (**ug**/l): 0.5 cadmium, 10 chromium, 0.5 copper, 0.5 lead, 0.005 mercury, 0.5 nickel, 0.5 silver, 20 zinc, 10 cyanide.

[2] Monthly average is the average of all daily results in a calendar month regardless of the number of samples analyzed.

[3] Week means Sunday through Saturday. Month means calendar month. 6 months means January through June and July through December. The date and time of an individual grab sample is the date and time at which the sample is collected. The date of a composite sample is the date on which sample collection for the composite sample is started and stopped. The composite sample date will be one day if the composite sample is collected on one day, e.g. April 14, 2007, or two days if the composite sample is collected over two days, e.g. April 14-15, 2007. Monitoring by the Control Authority is not a substitute for monitoring required to be conducted by the Permittee in this permit unless the Control Authority notifies the Permittee

in writing that specific monitoring by the Control Authority can be used to meet permit frequency requirements.

[4] The Permittee has an approved Toxic Organics Management Plan (TOMP) and must comply with the TOMP. Certification statements in each monitoring report are required in lieu of TTO monitoring. Any TTO analysis performed according to the methods in 40 CFR 136 must be submitted in the monitoring reports and is limited as specified in this table.

[5] Usage flow (incoming water) shall be the sum of flows measured at the three city water meters - at the north side of the main office building, at the southwest corner of the property, and at the northeast corner of the property.

[6] Measure continuously with a flow meter with a totalizer. Report daily flow for wastewater discharge on all monitoring days, and average daily and total monthly flow for water usage and wastewater discharge.

SECTION C. COMPLIANCE SCHEDULE

The Permittee shall achieve compliance with the effluent limitations specified for discharges on the effective date of this permit.

SECTION D. OTHER SPECIFIC REQUIREMENTS

1. Pollution Prevention

The Permittee shall reevaluate its pollution prevention assessment and submit the results to the Industrial Pretreatment Coordinator (IPC) within 1 year of the effective date of this permit.

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PART II - STANDARD MONITORING, RECORD KEEPING & REPORTING REQUIREMENTS

SECTION A. MONITORING

1. Monitoring by Approved Methods

Sampling and analyses must be conducted according to procedures approved under 40 CFR Part 136, unless other procedures have been specified in this permit. The Permittee shall insure that both calibration and maintenance activities will be conducted on all monitoring and analytical instrumentation at intervals frequent enough to ensure accuracy of measurements. An adequate analytical quality control program shall be maintained by the Permittee or State approved commercial laboratory. At a minimum, spikes and duplicate samples are to be analyzed on 10% of the samples where applicable.

If the Permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the industrial monitoring reports.

2. Sampling Facility and Monitoring Equipment

The Permittee shall provide a suitable sampling facility(s) together with such necessary manholes, meters and other equipment to facilitate observation, sampling and measurement of the process and/or combined wastes from the permitted discharge.

Such facility(s) and other appurtenances shall be accessibly and safely located and shall be constructed in accordance with plans approved by the Industrial Pretreatment Coordinator and shall be constructed, operated, and maintained at the Permittee's expense.

Such facility(s) and other appurtenances shall be maintained to be safe and accessible at all times and shall be made available for use by the Industrial Pretreatment Coordinator for monitoring and/or sampling upon request.

3. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring point(s) specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestreams, body of water, or substance. Monitoring points shall not be changed without notification to, and approval of, the Industrial Pretreatment Coordinator.

4. 24-Hour Reporting and Automatic Resampling

If the results of the Permittee's analysis indicate that a violation of this permit has occurred,

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the Permittee must inform the Industrial Pretreatment Coordinator (IPC) of the violation within 24 hours of becoming aware of the violation. The Permittee shall repeat the sampling and analysis and submit the results of the repeat analysis to the IPC within 30 days of becoming aware of the violation.

The IPC may waive the resampling requirement if the IPC performs sampling at the Permittee at least once per month, or the IPC performs sampling at the Permittee between the time when the Permittee performs its initial sampling and the time when the Permittee receives the results of this sampling.

5. Flow Measurement Devices and Method

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected, provided, used, calibrated and maintained by the Permittee to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained by trained personnel to insure that the accuracy of the measurement is consistent with the accepted capability of that device. A calibration log shall be maintained and must include dates of service and calibration, who performed the calibration and the methods used in the calibration. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes. The Industrial Pretreatment Coordinator shall be allowed to check or request a check of the calibration of the system at any time.

SECTION B. RECORD KEEPING

1. Retention of Records

The Permittee shall retain records of all monitoring information resulting from monitoring activities, including all calibration and maintenance records, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, or application. This period may be extended by request of the Industrial Pretreatment Coordinator at any time.

All records which pertain to matters which are the subject of enforcement or litigation activities pursuant hereto shall be retained and preserved by the Permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

2. Record Contents

Records and monitoring information shall include:

a. The exact date, location, time and method of sampling;
b. The individual(s) who performed the sampling or measurement;
c. The date(s) analyses were performed;

d. The individual(s) who performed the analyses;
e. The analytical techniques or methods used;
f. The results of all required analyses;
g. Laboratory QA/QC results; and
h. Chain of Custody documentation.

3. Manifest of Wastes Removed

The Permittee shall provide a manifest or other record of wastes removed by the pretreatment system and method(s) of disposal. These records shall be made available to the Industrial Pretreatment Coordinator upon request.

4. Duty to Provide Information

The Permittee shall furnish to the Industrial Pretreatment Coordinator (IPC) within a reasonable time, any information, including that requiring additional monitoring and/or analyses, which the IPC may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit or to determine compliance with this permit. The Permittee shall also furnish, upon request, copies of records required to be kept by this permit.

5. Availability of Data

Information included in or pertaining to this permit or any information obtained during or as a result of inspection or other monitoring shall be made available to any agency regulating this program and to the public, to the extent provided by 40 CFR Part 2.302 (Public Information) and 40 CFR Part 403.14 (Confidentiality).

SECTION C. REPORTING

1. Discharge Monitoring Report

No later than the 21st day of each month the Permittee shall provide the Industrial Pretreatment Coordinator (IPC) with a summary report of pollutant discharges for the previous calendar month. Submit Discharge Monitoring Reports even when no discharge occurs during the reporting period. The report shall include:

a. Industry name and address;
b. Industry contact name;
c. Industrial waste discharge permit number;
d. Category;
e. Monitoring location(s);
f. Reporting period;
g. Sample dates;
h. Pollutant limits;
i. Daily pollutant concentrations, mass, and units;
j. Monthly average pollutant concentrations, mass, and units;

k. Daily flow for wastewater discharge on all monitoring days, and average daily and total monthly flow for water usage and wastewater discharge and units;
l. Compliance statement;
m. TTO certification statement if a TOMP plan has been approved:
"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority."
n. 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 and imprisonment for knowing violations."
o. Signature of authorized signatory (See Attachment A).

2. Compliance Schedule Reporting

If construction or placement of facilities or equipment is required to meet limitations, requirements, and/or conditions of this permit, a proposed compliance schedule shall be submitted by the Permittee within fourteen (14) days of the effective date of this permit unless otherwise specified.

Compliance schedules shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment facilities and procedures required for the user to meet the applicable pretreatment standards (e.g., hiring an engineer, completing preliminary plans, completing final plans, executing contracts for major components, commencing construction, completing construction, etc.).

No increment shall exceed 9 months nor shall the entire schedule exceed 18 months.

Reports of compliance or noncompliance with, or any progress reports on interim and final requirements contained in any compliance schedules of this permit shall be submitted no later than fourteen (14) days following each schedule date. Any reports of noncompliance shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

3. Averaging Measurements and Detection Limits

Calculations that require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this permit. If a result is less than the detection limit, the detection

limit is used to determine compliance, to calculate averages, and to calculate mass.

4. Notification of Unusual Loadings

The Permittee shall immediately notify the Industrial Pretreatment Coordinator once aware of any unusual loadings released to the wastewater collection system and shall take immediate appropriate action to mitigate any adverse effects of such loadings, including ceasing of processing operations, if required.

5. Planned Changes

The Permittee shall submit prior notice to the Industrial Pretreatment Coordinator, if possible at least 30 days before any planned change in production or treatment process or any planned physical alterations or additions to the permitted facility.

This notification shall be in writing and shall apply to all pollutants whether limited by this permit or not and to any activity which would result in the discharge of those pollutants to the POTW.

6. Notification of Shutdown

Notification of any shutdown period of more than (2) days shall take place at least 48 hours prior to the shutdown period. Notification of any shut down period of more than (5) days shall be in writing and shall take place at least (2) weeks prior to the first day of shutdown. Notification shall be given to the Industrial Pretreatment Coordinator (IPC) and shall include the following:

a. The date shutdown will start;
b. the last shift to work on the date of shutdown;
c. the date process operations will resume; and
d. the first shift to work on the date of startup.

The strength and characteristics of the wastewater load that is generated during any significant shutdown period shall be approved by the IPC.

7. Anticipated Noncompliance

The Permittee shall submit prior notice to the Industrial Pretreatment Coordinator, if possible at least 30 days before any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

8. Twenty-four Hour Reporting (Bypass, Upset, Spill, Slug, or Noncompliance)

The Permittee shall notify the Industrial Pretreatment Coordinator immediately, but no later than twenty-four (24) hours from the time the Permittee becomes aware of the occurrence of any bypass of the treatment system, upset which places the Permittee in a temporary state of noncompliance, any potentially harmful spill, accidental or slug discharge, or any

noncompliance which may endanger health, the environment, or operation of the POTW. The notification shall include location of discharge, date and time thereof, type of waste including concentration and volume, and corrective actions taken. The Permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements under local, State, or federal laws.

Written notification of the accidental discharge shall be made to the Industrial Pretreatment Coordinator within five (5) days and shall contain:

a. A description of the event and its suspected cause;
b. The duration of the event, including exact dates and times;
c. The impact of the event on the Permittee's compliance status;
d. If cessation of the event has not occurred, the anticipated period of time it is expected to continue; and
e. Steps taken or planned to reduce, eliminate, and prevent recurrence of the event.

9. Other Noncompliance

The Permittee shall report all instances of noncompliance at the time monitoring reports are submitted unless otherwise required.

10. Certification in Lieu of Monitoring

A Permittee subject to total toxic organics limitations may be allowed to submit a Toxic Organic Management Plan (TOMP) with prior approval of the Industrial Pretreatment Coordinator (IPC). If a TOMP has been approved by the IPC, the Permittee must submit a certification statement as part of the semi-annual report (or more frequently, if more frequent reporting is required) certifying compliance with the approved TOMP.

11. Signatory Requirements

All reports or information submitted pursuant to the requirements of this permit must be signed and certified by an authorized signatory of the Permittee. Signed copies of a Signatory Authorization Form (Attachment A) must be submitted to the Industrial Pretreatment Coordinator for any individual to be considered an authorized signatory. See Attachment A for the definition of an authorized signatory.

Any authorized signatory signing reports or information submitted in accordance with this permit shall make the following written certification:

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

violations.

12. Address for Report Submissions

All reports and notices required by this permit shall be submitted to:

Operations Management International, Inc.
Attn.: Industrial Pretreatment Coordinator
1400 N. Fox Hunter Road
Fayetteville, AR 72701

(479) 443-3292

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PART III - STANDARD CONDITIONS

SECTION A. GENERAL CONDITIONS

1. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation.

2. Limitations Subject To Revision

Any changes in EPA, State of Arkansas, or local applicable regulations shall supersede this permit. The Permittee will be notified of the changes and required to develop a compliance schedule if changes in the Permittee's treatment processes or facilities are necessary to insure compliance with the regulatory changes.

These specific limitations are subject to revision if and at such time as the effluent limitations and other requirements of the POTW are revised.

These specific limitations are subject to revision if and at such time as it is determined that discharge from the Permittee is or has become detrimental to the public health or safety, the health or safety of the operators of the POTW, the biological or structural integrity of the POTW including the collection system, and/or the protection of the receiving waters.

3. Property Rights

This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

4. Regulatory Changes

Any changes in EPA, State, or local pretreatment regulations that are more stringent than the requirements of this permit shall supersede this permit. The Permittee will be notified of the change and required to develop a compliance schedule if changes in the Permittee's treatment process or facility are necessary to insure compliance with the regulatory change(s).

5. Toxic Pollutants

If a toxic effluent standard or prohibition is established for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit may be revised or modified in accordance with the toxic effluent standard or prohibition and the Permittee so notified.

6. 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.

7. Permit Modification, Revocation, Suspension, Termination

This permit may be modified, revoked and reissued, suspended, or terminated with cause in accordance with the requirements of the Discharge and Pretreatment Regulations subchapter of the Fayetteville Code and/or State or federal regulations, or for other good cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, suspension, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

8. Permit Transfer

This permit may be transferred to a new owner or operator if the Permittee gives at least seven (7) days advance notice to the Control Authority, provides a copy of the existing permit to the new owner or operator, and the Control Authority approves the wastewater discharge permit transfer. The notice to the Control Authority must include a written certification by the new owner or operator which:

a. States that the new owner and/or operator has no immediate intent to change the facility's operations and processes;
b. Identifies the specific date on which the transfer is to occur; and
c. Acknowledges full responsibility for complying with the existing wastewater discharge permit.

9. Duty to Reapply

The Permittee is responsible for filing an application for reissuance of the permit at least ninety (90) days before the expiration date of this permit.

10. Continuation of Expired Permits

If on the date of expiration of this permit, a new permit has not been issued, the requirements and limitations of this permit shall continue to be effective and enforceable unless the Permittee has received notice of suspension, revocation and/or termination of the permit.

SECTION B. OPERATION AND MAINTENANCE

1. Proper Operation and Maintenance

The Permittee shall at all times maintain in good working order and operate as efficiently as possible all facilities and systems of treatment, control, sampling, measurement and/or

analysis installed or used by the Permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate process control.

2. Need to Halt or Reduce Not a Defense

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Duty to Mitigate

The Permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health, the POTW treatment facility, the waters receiving the POTW treatment facility discharge, or the environment.

Reasonable steps include but are not limited to accelerated or additional monitoring and/or analyses necessary to determine the nature and impact of the noncomplying discharge.

4. Bypass of Treatment System

Bypass of the treatment system is prohibited, unless:

a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
b. There was no feasible alternative to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime;
c. The Industrial Pretreatment Coordinator approved an anticipated bypass, considering its adverse effects, if the Permittee, knowing in advance of the need for a bypass, submitted prior notice in writing at least ten (10) days before the bypass; or
d. The bypass does not cause effluent limitations to be exceeded.

5. Affirmative Defense

An upset may constitute an affirmative defense for action brought for the noncompliance. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation. The Permittee has the burden of proof to provide evidence and demonstrate that none of the factors specifically listed above were responsible for the noncompliance.

A Permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An upset occurred and that the Permittee can identify the specific cause of the upset;

b. The permitted facility was at the time being properly operated; and
c. The Permittee submitted notice of the upset as required.

6. Removed Substances and RCRA Requirements

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of waste waters shall be disposed of in a manner such as to prevent any pollutants from such materials from entering the sewer system. The Permittee is responsible to assure its compliance with any requirements regarding the generation, treatment, storage, and/or disposal of hazardous wastes as defined under the Federal Resource Conservation and Recovery Act and State of Arkansas rules and regulations relative to refuse, liquid and/or solid waste disposal.

7. Disposal of Sludges and Spent Chemicals

The Permittee shall dispose of sludges and spent chemicals in accordance with procedures in Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

8. Emergency Action

In the event of a power loss to the Permittee's treatment facility, the Permittee shall provide treatment to the best of his ability and shall report immediately to the Industrial Pretreatment Coordinator any noncompliance resulting from the emergency situation.

9. Dilution Not Permitted

The Permittee shall not increase the use of potable or process water 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 this permit.

SECTION C. RESULTS OF NONCOMPLIANCE

1. Duty to Comply

The Permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Fayetteville Code and may be grounds for enforcement action.

2. Penalties for Violations of Permit Conditions

The Permittee is subject to a civil or criminal penalty of not more than $1000.00 per violation per day for each day that the Permittee is in violation of the requirements of this permit, the pretreatment standards, or the Discharge and Pretreatment Regulations subchapter of the Fayetteville Code.

3. Permit Suspension, Revocation and Termination

This permit may be suspended, or revoked and terminated in accordance with the requirements of the Discharge and Pretreatment Regulations subchapter of the Fayetteville Code and/or the approved Enforcement Response Plan.

4. Tampering

Any person who falsifies, tampers with, or knowingly renders inaccurate, any monitoring device or method required to be maintained under this permit shall be subject to civil and/or criminal penalties.

5. Falsification of Reports

The Fayetteville Code provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than one thousand dollars ($1000.00) per day.

6. Publication in Newspaper for Significant Noncompliance

The Fayetteville Code provides that, in accordance with 40 CFR 403.8(f)(2)(vii), an industrial user will be published at least one time annually in a newspaper(s) of general circulation within the jurisdiction(s) served by the POTW when found to be in significant noncompliance. An industrial user is in significant noncompliance if its violations meet one or more of the following criteria:

a. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent or more of all of the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter;

b. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH);

c. Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the Control Authority determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public);

d. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of this section to halt or prevent such a discharge;

e. Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;

f. Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;

g. Failure to accurately report noncompliance;

h. Any other violation or group of violations which the Control Authority determines will adversely affect the operation or implementation of the local pretreatment program.

7. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the Permittee from civil and/or criminal penalties for noncompliance under local, State or Federal laws or regulations.

PART IV - OTHER REQUIREMENTS

SECTION A. RIGHT OF ENTRY

The Permittee shall allow any authorized representative of the EPA, State of Arkansas, or City of Fayetteville pretreatment program, bearing proper credentials and identification:

1. To enter upon the Permittee's premises where a real or potential discharge is located or records are required to be kept under the terms and conditions of this permit;

2. To have access to and copy records required to be kept under the terms and conditions of this permit; to inspect any facility, materials storage or monitoring equipment; to observe monitoring practices, process or facility operations; to sample any discharge; and

3. Where the Permittee has security measures in force which require proper identification and/or clearance before entry onto said Permittee's premises is granted, such Permittee shall make the necessary arrangements with the security guards that upon presentation of proper identification, the IPC shall be permitted to enter without delay. The Industrial Pretreatment Coordinator shall have access to production, materials storage, and wastewater pretreatment areas as well as operating, monitoring, and pretreatment records of the Permittee Plant. Access shall be granted immediately upon request at any time deemed necessary provided proper identification is provided by the entrant.

SECTION B. BOILER SYSTEM

No chemicals other than chlorine, inorganic acids and inorganic bases (e.g., sulfuric acid, sodium hydroxide, etc.) are to be used in the boiler system without prior approval from the Industrial Pretreatment Coordinator. In requesting permission to use chemicals in the boiler system, the Permittee must provide the following information:

1. Name of chemical compound (trade name and/or brand name);
2. Name and address of manufacturer and name and telephone number of local representative;
3. Copy of the Material Safety Data Sheet; and
4. Proposed application rates and frequency of application.

SECTION C. ACCIDENTAL SPILL/SLUG PREVENTION PLAN

If the Permittee does not have one, an Accidental Spill/Slug Prevention Plan (ASPP) shall be developed and submitted for approval.

Failure of the plan to prevent violations of any other provisions of this permit in no way relieves the Permittee from its legal liability for noncompliance with the permit conditions.

At a minimum, the ASPP must address the following:

1. General information: facility name & address, contacts and phone numbers, individual

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responsible for implementation, EPA ID number, type of business, operating schedule, and number of employees;
2. Facility layout and flow diagram;
3. Chemical and materials inventory;
4. Description of discharge practices, including non-routine batch discharges;
5. Spill/slug prevention equipment and procedures;
6. Emergency response equipment and procedures;
7. Spill/slug reporting including procedures for immediately notifying the POTW of slug discharges, including a discharge that would violate a prohibition under 51.075(B)(2) of the Fayetteville Code of Ordinances with procedures for follow-up written notification within five days;
8. ASPP modification procedures;
9. Training program; and
10. Certifications.

The ASPP must provide for notification of spill events to the proper authorities, including the POTW. The following information must be included in the plan under notification to the POTW and should be posted on a chain-of-contacts list on information boards and in other appropriate areas throughout the plant:

OPERATIONS MANAGEMENT INTERNATIONAL, INC.
(Paul R. Noland Wastewater Treatment Facility)
1400 N. Fox Hunter Road
Fayetteville, Arkansas 72701

479-443-3292, 24 hours/day, 7 days/week

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PART V - DEFINITIONS

A. **CFR** means Code of Federal Regulations

B. **Composite sample** means a sample usually comprised of a minimum of twelve (12) aliquots collected over a period of no more than twenty-four (24) hours. If the daily discharge is less than (24) hours, a minimum of (4) aliquots per day at equal time intervals should be taken.

C. **Control Authority** means the local agency regulating the local pretreatment program and its authorized representatives including, but not limited to, the Industrial Pretreatment Coordinator.

D. **Discharge** means an intentional or unintentional action or omission resulting in the releasing, spilling, leaking, pouring, emitting, emptying, or dumping of a pollutant into the waters of the State or the US, or onto land or into wells from where it might flow or drain into said waters onto lands outside the jurisdiction of the State. Discharge includes the release of any pollutant into a POTW.

E. **Fayetteville Code** means the City of Fayetteville Code of Ordinances

F. **Flow proportioned** means a composite sample that is collected proportional to each stream flow at time of collection of each aliquot or to the total flow since the previous aliquot. Sampling may be flow proportioned either by varying the volume of each aliquot or the time interval between each aliquot. If discrete sampling is employed, at least 12 aliquots should be composited.

G. **Grab sample** means an individual sample collected over a period of time not to exceed 15 minutes. It is a single sample and is representative of conditions and characteristics of the discharge at the time it is collected.

H. **Industrial Pretreatment Coordinator (IPC)** means an authorized representative of the Control Authority that implements and coordinates the pretreatment program or the IPC's authorized representative.

I. **lb./day** means pounds per day.

J. **mg/l** means milligrams per liter.

K. **NA** means not applicable.

L. **NPDES** means National Pollutant Discharge Elimination System and refers to the discharge permit issued to the POTW.

M. **pH** means the acidity or alkalinity of a solution. Neutral is 7.0, acidic is lower, and alkaline is higher.

N. **POTW** means the publicly owned treatment works including the collection system, treatment plant and other appurtenances. It also means the municipality having jurisdiction over dischargers to the treatment plant.

O. **Slug** means any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or non-customary batch discharge.

P. **TSS** means total suspended solids.

Q. **TTO** means total toxic organics.

R. **Upset** is an unintentional and temporary noncompliance with permitted effluent discharge limitations because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed or inadequate treatment facilities, lack of preventative maintenance, or careless or improper operations.

PART VI - OMI AUTHORIZATION

Operations Management International, Inc. (OMI) is authorized by contract to manage and operate the Paul R. Noland Wastewater Treatment Facility for the City of Fayetteville. Management and operation of this facility includes administering the industrial pretreatment program.

So long as this contract or subsequent contractual agreements remain in effect, the Industrial Pretreatment Coordinator or any other employee of OMI will be the authorized representative of the City of Fayetteville.

ATTACHMENT A - SIGNATORY AUTHORIZATION

All reports and information submitted pursuant to the requirements of this discharge permit will be signed and certified by an **authorized signatory** of the Permittee. A signed copy of this Signatory Authorization Form must be submitted to the Industrial Pretreatment Coordinator for any individual to be considered an authorized signatory. In accordance CFR Part 403.12(i), an authorized signatory is:

(1) A responsible corporate officer, if the industrial user is a corporation; a responsible corporate officer means (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second-quarter 1980 dollars), if 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 industrial user is a partnership or sole proprietorship respectively; or

(3) A duly authorized representative of the individual designated in (1) or (2) of this definition if (i) the authorization is made in writing by the individual described in (1) or (2) of this definition, and (ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company, and (iii) the written authorization is submitted to the Control Authority.

Authorized Signatory

_____
Effective Date

_____
Authorized Signatory Name (Print)

_____
Authorized Signature

_____
Title

If authorized signatory at left is a (3) above, she/he is authorized by the official below who is a (1) or (2) above:

_____
Name (Print)

_____
Signature

_____
Title

Authorization Revoked by:

_____ _____
Signature of a Current Authorized Signatory Date Revoked

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FILE COPY

Industrial Pretreatment Program Inspection Report - Long Form
City of Fayetteville

Date 12/4/08

Reported by Denise Georgiou

A. Facility Description

Name Superior Industries International Contact Name Lynn Pate

Location address 1901 Borick Drive, Fayetteville, AR 72701

Mailing address 1901 Borick Drive, Fayetteville, AR 72701

Principal product/service Aluminum Wheels - cast, coat, paint, & polish

Permit No. FAY09 n/a ☐ SIC Code(s) 3363, 3398, 3714, 3479

Categorical ☒ 433 Significant noncategorical ☐ Undetermined ☐

Operating schedule: Hours/day 24 Days/week 4-5 Weeks/year 50

Shift schedule: 1st 7am-3pm 2nd 3pm-11pm 3rd 11pm-7am; 4th 6am-6pm weekends

Scheduled plant shutdown periods 1 week in July & 2 weeks (this year) in December

Plant activities during shutdown Maint, cleanup (1st 3 days), pump out soap, deoxidizer tanks, descale & sludge removal on cooling towers to clarifier then clean out clarifiers.

Discharge schedule: Hours/day 24 Days/week 7 Weeks/year 52

Employees per shift: 1st 450 2nd 300 3rd 100 4th 50

B. Inspection Description

Entry time 10:40 hours Exit time 13:30 hours

Type inspection (check all that apply):

☒ Scheduled	☐ Partial
☐ Unscheduled (2 hrs. notice or less)	☐ User Classification
☐ Demand	☐ Pre-permit
☐ Initial	☐ Compliance follow-up
☒ Comprehensive	☒ Other Annual Compliance

Attendance:

Name/Title	Facility/Agency	Telephone
Denise Georgiou/IPC	OMI	443-3292
Bill Koch/Environmental Technician	Superior Industries	443-7870x6330

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C. **Wastestream Description (All Facilities)**

Reviewed plant schematic(s): Yes ☒ No ☐

Schematic(s) on file with Control Authority: Yes ☒ No ☐

If not on file, contacted _____ to obtain.

	Schematic includes yes	no	n/a	Reviewed Actual site yes	no	Condition (good, bad, poor)
Location(s) incoming water	☐	☒	☐	☐	☒	____
Regulated wastestream(s)	☒	☐	☐	☒	☐	Good
Unregulated wastestream(s)	☐	☐	☒	☐	☐	____
Dilutional wastestream(s)	☒	☐	☐	☒	☐	Good
All floor drains/trenches	☒	☐	☐	☒	☐	Good
Locations of:						
chemical storage area(s)	☒	☐	☐	☒	☐	Good
raw material storage area(s)	☒	☐	☐	☒	☐	Good
acid use area(s)	☒	☐	☐	☒	☐	Good
caustic use area(s)	☒	☐	☐	☒	☐	Good
other area(s)	☐	☐	☒	☐	☐	____
(specially handled materials) explain other: ____						
Layout of:						
major plant feature(s)	☒	☐	☐	☒	☐	Good
pretreatment facilitie(s)	☒	☐	☐	☒	☐	Good
Locations of drainage from:						
boiler(s)	☒	☐	☐	☐	☐	____
cooling systems	☒	☐	☐	☐	☐	____
dehumidifier(s)	☐	☐	☒	☐	☐	____
air pollution control equip.	☒	☐	☐	☐	☒	____
Sanitary sewer connection(s)	☒	☐	☐	☒	☐	Good
Storm sewer connection(s)	☐	☒	☐	☒	☐	Good

Comments: Toured entire plant, all processes, waste treatment areas, chemical storage and use, and residuals handling areas.

D. **Regulated Processes (Each)**

Regulated process description Wheel Casting

Federal category/subcategory 40 CFR 433 Metal Finishing

Average production (if production based limits) NA

Operating schedule 24 hrs/day, 5 days/week

Discharge type: Continuous ☐ Batch ☒ Both ☐

Volume/frequency: Continuous -0- Batch 1,000 gal/batch from x-ray quench

Sample location(s) receiving these wastewaters SUP003

Comments Bleed from cooling tower (90% noncontact, but 4 quench tanks for x-ray inspection of small percent of wheels is contact), sumps at casting decks for line breaks.

Regulated process description Heat Treat (Aluminum)

Federal category/subcategory 40 CFR 433 Metal Finishing

Average production (if production based limits) NA

Operating schedule 24 hrs/day, 5 days/week

Discharge type: Continuous ☒ Batch ☐ Both ☐

Volume/frequency: Continuous 1,000 gpd Batch _____

Sample location(s) receiving these wastewaters SUP003

Comments Untreated at SUP003 except clarifier; SUP003 flows to SUP005.

Regulated process description Preparation for paint and clear coat

Federal category/subcategory 40 CFR 433 Metal Finishing

Average production (if production based limits) NA

Operating schedule 16 hrs/day, 5 days/week

Discharge type: Continuous ☒ Batch ☒ Both ☐

Volume/frequency: Continuous 100,000 gpd Batch 10,000 gpd on weekends only

Sample location(s) receiving these wastewaters SUP003

Comments Discharge volume is 50% paint processs and 50% clear coat process. Tank dumps on weekend are batch discharged. 2 RO concentrates discharged here as dilutional water.

Regulated process description Alodine is gone. (Switched to non-chrome coating included as part of prep for paint & clear coat above)

Federal category/subcategory _____

Average production (if production based limits) _____

Operating schedule _____

Discharge type: Continuous ☐ Batch ☐ Both ☐

Volume/frequency: Continuous _____ Batch _____

Sample location(s) receiving these wastewaters _____

Comments _____

Regulated process description Pre-Melt (Equipment name): Coolant to cool metal as machining occurs.

Federal category/subcategory 40 CFR 433 Metal Finishing

Average production (if production based limits) NA

Operating schedule 24 hrs/day, 7 days/week

Discharge type: Continuous ☐ Batch ☒ Both ☐

Volume/frequency: Continuous -0- Batch 2000 gallons (four 500-gallon batches over the weekend, Sat & Sun, of coolant from machines on floor)

Sample location(s) receiving these wastewaters SUP003

Comments 80,000 gal system is trucked out once every 2-5 years. Changed out March '06, & July '07 (changed type of coolant back to previous used type). The premelt wash tank is surrounded by a pit with a sump that pumps air compressor condensate and mop rinse water to SUP 003. Discharge would be possible by tank failure, spill, or intentional means because the coolant needs to be pumped to SUP 003 (Sump does not autmatically pump). (Air compressor condensate, RO concentrate, infrequent boiler blowdown, cooling tower bleed are dilutional, but go to same outfall.)

Regulated process description Bright polish

Federal category/subcategory 40 CFR 433 Metal Finishing

Average production (if production based limits) NA

Operating schedule 8 hrs/day, 5 days/week

Discharge type: Continuous ☒ Batch ☐ Both ☐

Volume/frequency: Continuous 10,000 gpd Batch 2500 gallons/day on weekends

Sample location(s) receiving these wastewaters SUP006

Comments Chrome plating was decomissioned Aug '06 & cyanide process & destruct system were removed. Dust collectors ~20,000 gpd. Dust collectors and French drain discharge here as dilutional water. Deox 4707, 4661 tanks are not used hereanymore. Use DI in these tanks now.

E. Sample Location(s) (Each)

Sample location no. SUP001 Verified during inspection ☒ Sampled ☐

Description This was the original sampling point (vent pipe) west of the building

Estimated volume/description of:

Regulated flow -0-

Unregulated flow -0-

Dilutional flow -0-

Projected process flow in 5 years _____

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Flow measurement approved ☐ Verified during inspection ☐

Flow meter calibrated ☐ Observed calibration ☐ Reviewed records ☐

Collection methods approved ☐ Verified during inspection ☐

Comments Repiped so no water & no pipes go to SUP001 per approved plan.

Sample location no. SUP002 Verified during inspection ☒ Sampled ☐

Description Manhole in parking lot in front of main office "L"

Estimated volume/description of:

Regulated flow ____

Unregulated flow ____

Dilutional flow 10,000 gpd, 5 days/week

Projected process flow in 5 years ____

Flow measurement approved ☐ Verified during inspection ☐

Flow meter calibrated ☐ Observed calibration ☐ Reviewed records ☐

Collection methods approved ☐ Verified during inspection ☐

Comments SUP002 discharges downstream of SUP005. (SUP002 is solely domestic waste) Rest of domestic waste meets discharge from 003 nearby 006 in manholes & continues to SUP 005.

Sample location no. SUP003 Verified during inspection ☒ Sampled ☐

Description 3" Parshall flume, 20 yrds from N. wall of clearcoat room

Estimated volume/description of:

Regulated flow 110,000 gpd, 5-6 days/week

Unregulated flow ____

Dilutional flow 10,000 gpd

Projected process flow in 5 years ____

Flow measurement approved ☐ Verified during inspection ☐

Flow meter calibrated ☐ Observed calibration ☐ Reviewed records ☐

Collection methods approved ☐ Verified during inspection ☐

Comments SUP003 discharges to SUP005 and includes some domestic waste. Tool crib washer discharges to SUP003, 300 gpd max, 5 days/week. Sanitary from manufacturing facility enters in manhole after SUP003, ~10,000 gpd.

Sample location no. SUP004 Verified during inspection ☒ Sampled ☐

Description 1" Parshall flume at west end of CN destruct at aisle in waste treat room at chrome plant has been removed as part of the chrome plaing decommisioning.

Estimated volume/description of:

Regulated flow NA

Unregulated flow ____

Dilutional flow ____

Projected process flow in 5 years ____

Flow measurement approved ☐ Verified during inspection ☐

Flow meter calibrated ☐ Observed calibration ☐ Reviewed records ☐

Collection methods approved ☐ Verified during inspection ☐

Comments ____

Sample location no. SUP005 Verified during inspection ☒ Sampled ☐

Description 3-inch Parshall flume in manhole 420 feet north of plating plant just south of sampling shed.

Estimated volume/description of:

Regulated flow 180,000 gpd, 5-6 days/week.

Unregulated flow ____

Dilutional flow 20,000 gpd, 5-6 days/week

Projected process flow in 5 years ____

Flow measurement approved ☒ Verified during inspection ☒

Flow meter calibrated ☒ Observed calibration ☐ Reviewed records ☒

Collection methods approved ☒ Verified during inspection ☐

Comments SUP002, 003, & 006 discharge to SUP005. SUP005 is the sampling point for metals and cyanide.

Sample location no. SUP006 Verified during inspection ☒ Sampled ☐

Description 3" Parshall flume, 8 ft north of plating plant

Estimated volume/description of:

Regulated flow 50,000 gpd, 5-6 days/week

Unregulated flow ____

Dilutional flow ____

Projected process flow in 5 years ____

Flow measurement approved ☐ Verified during inspection ☐

Flow meter calibrated ☐ Observed calibration ☐ Reviewed records ☐

Collection methods approved ☐ Verified during inspection ☐

Comments SUP006 discharges to SUP005.

F. **Industry Self-Monitoring Program**

Has the approved self-monitoring program been implemented? ☒
(If not, check ☐ and go to the next page.)

All regulated waste streams sampled ☒ Verified ☒
Sampling performed by: Industry ☒ Contract lab ☐
Analysis performed by: Industry ☐ Contract lab ☒ Both ☐

Industry personnel responsible for sampling and/or analysis trained to do so? ☒ by whom Lynn Pate, Corporate Environmental Manager

Name/address of contract lab(s) Environmental Services Co., Springdale

Lab(s) performing analyses by approved methods as per 40 CFR Part 136?
Industry ☐ Contract lab ☒
Verified during inspection ☒ Observed analysis ☐

Records kept of dates, times, locations, methods and names of persons taking samples? ☒ Verified during inspection ☒

Records kept of regulated production, continuous and batch discharge schedules, observations, etc. on sampling days? ☒ Verified ☒

Records kept of time and method of sample preservation? ☒ Verified during inspection ☒

Are refrigerated autosamplers and refrigerators used for sample storage at a temperature of 4□C or below but not freezing? ☐ Verified during inspection ☐ Is there an appropriate thermometer in each? ☐ Verified during inspection ☐

Records kept of dates, times, methods of sample delivery to contract lab, and names of persons receiving samples? ☒ Verified ☒

Chain-of-custody records being used? ☒ Verified ☒

Records on site of all analytical results for at least 3 years? ☒ Verified during inspection ☒

If production based standards apply, were records reviewed and discussed to verify production levels used in calculation of allowed pollutant mass discharge? ☐

Are reporting/certification/notification requirements being met? ☒
Reviewed prior to inspection ☒ Verified during inspection ☒

Comments Industry conducts process control sampling and analysis. Nitric acid used as preservative for metals samples. Cyanide is grabbed just before lab arrives to pick it up and lab ices grab for Superior so no refrigeration.

G. **Industrial User Compliance Schedule**

User on an approved pretreatment compliance schedule? ☐

Scheduled completion date _____

User meeting schedule? ☐ User submitting reports? ☐

User implementing approved interim compliance measures? ☐ Verified ☐

Comments _____

H. Pretreatment System

Is there a pretreatment system? ☒ Is it approved? ☒

Description Settling tanks, clarifiers, pH adjustment, drag chain in dust collectors to remove solids.

Contributing processes Wheel plant deox and etch tank are pH adjusted & discharged to the clarifiers, and 4-stage washers rinse overflows go straight to the clarifier & washers are discharged on weekends.

Is system operated per approved plans? ☒ Verified ☒

Is system operated per approved schedule? ☒ Verified ☒

Is there an assigned operator? ☒ Has the operator been trained? ☒

Is the system regularly maintained? ☒ Verified ☒

Are grease traps/waste pits routinely cleaned? ☒ Verified ☒

Are operational and maintenance records kept? ☒ Reviewed ☒

Can this system be bypassed by obvious means? ☒

If yes, who was this reported to? Lynn Pate or Bill Koch (pH is manually controlled & settling tanks & clarifier must be cleaned periodically)

Comments _____

I. Residuals Management

Describe volume produced, handling, storage, and disposal of residuals generated by pretreatment system, including names of haulers and disposal sites:

In-ground clarifiers: Usually pump out supernate to sewer. Rest is analyzed for metals then hauled by FCC Environmental to the Waste Management 2 Pines landfill in N. Little Rock. Approximately 20,000 gallons 2x/year each. Non-haz waste.

Coolant - See section D.

Grit from truck dock settling area is dewatered (liquid to clarifier), grit is shoveled into special waste to Tontitown Landfill. Approximately 3 cu yds per quarter.

Sludge from pit in paint room ships as reactive hazardous waste - will reprofile - may not be haz waste. One 55-gal drum/year by Strom Environmental.

Are residuals classified as hazardous wastes? ☒

Records kept? ☒ Reviewed during inspection ☒

Should handling, storage and/or disposal of wastes be discussed further with solid/hazardous waste

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specialist? ☐

If so, indicate what additional steps, if any, are required:

J. Waste Oil Management

Describe handling, storage and disposal of waste oils, including volume generated per year, frequency of disposal, and names of haulers and disposal sites:

Machine oil, hydraulic fluid, motor oil, way lubes, & tramp oil from coolant are drained to 5 gal buckets to 55 gal drums and IBC totes to non-haz storage and removed by FCC Environmental, 400 gal/month.

Chem Clean Station has been removed.

Are waste oils petroleum-based? ☒

Records kept? ☒ Reviewed during inspection ☒

Should handling, storage and/or disposal of wastes be discussed further with oil/hazardous waste specialist? ☐

If so, indicate what additional steps, if any, are required:

K. Solvent/Toxic Organics Management (STO)

Is there an approved STO Plan? ☒ Reviewed prior to inspection ☒
If so, is this plan being implemented? ☒ Verified ☒

Is there any evidence of discharge of solvents or defined toxic organics to sanitary sewer? ☐

Is there potential for discharge of solvents or defined toxic organics to sanitary sewer? ☒

Comments The plant processes were designed to severely restrict solvent use. Potential for discharge is low. All liquid waste must be pumped to discharge. Small amount of cleaning solvents from parts cleaners go into the waste oil. The waste lab solvents are shipped as hazardous waste. Need update.

L. Accidental Spill and Discharge Control

Are floor drains/manholes in proximity to: (if yes, where discharged to)

Chemical storage areas	☐		Verified ☒
Acid use areas	☐	NA ☐	Verified ☒
Caustic use areas	☐	NA ☐	Verified ☒
Raw materials storage areas	☐		Verified ☒
Maintenance shop areas	☐		Verified ☒

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Paint application areas ☐ NA ☐ Verified ☒

Are there spill facilities? ☒ Where discharged to? Depending on spill, treatment then sewer or collect & ship

Does User have an approved ASPP? ☒ Reviewed prior to inspection ☒

Are ASPP procedures being implemented including training and posting measures to take, contact names, and notification procedures? ☒
Verified ☒

Are ASPP records being maintained? ☒ Verified ☒

Does User have other spill plans or procedures? ☒ Reviewed ☐
Is there a need for an ASPP? ☐ If no, explain why ____

Comments Small spills are vacuumed into a 55 gal drum then tested and disposed of appropriately (discharged or shipped).

M. Defined Pollutants

List pollutants coming into direct contact with waste stream that discharges into POTW:

Soaps, caustics, acids, polishing liquid, aluminum, oil & grease, coolant; boiler & cooling tower blowdown with biocides, rust inhibitor, descaler. RO concentrate; regeneration solution from DI

List pollutants that have the potential to access the POTW collection system by spill, accidental discharge, machinery malfunction, etc.:

Same as above (all materials must be pumped). Premelt bermed area can be pumped to clarifier at SUP003 (coolant).

N. Close Out Interview

Attending Denise Georgiou, Bill Koch.

Findings:	OK	Not OK	NA	Comments
Waste stream schematic(s)	☒	☐	☐	____
Regulated process(es)	☒	☐	☐	____
Sample location(s)	☒	☐	☐	____
Self-monitoring program	☒	☐	☐	____
Compliance schedule	☐	☐	☒	____
Pretreatment system	☒	☐	☐	____
Residuals management program	☒	☐	☐	____
Waste oil management program	☒	☐	☐	____

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STO management program	☒	☐	☐	Provide update
ASPP procedures and postings	☒	☐	☐	____
Reporting	☒	☐	☐	____
Certification	☒	☐	☐	____
Notification	☒	☐	☐	____
Other (Specify: ____)	☐	☐	☐	____

O. Follow Up

Date and method of findings transmission to User if no close-out interview _____

Is a follow up inspection necessary? Yes ☐ No ☒

Have changes occurred in permitted activities, discharge locations, or sampling locations such that changes in the permit are necessary? ☐

Attach results of analysis of all samples collected during inspection. ☐

If applicable, was user classification determined? ☐

If yes, identify _____

Is a permit required? ☐

List noncompliances identified as a result of this inspection and corresponding enforcement responses taken or initiated: _____

Any other necessary follow up activities? _____

Other notes or comments on inspection activities

P2:

Storage tanks that were added to the paint product room to reduce chemical usage are used to neutralize and dump chemical when changing from paint to clearcoat and back again to utilize excess capacity in paint room.

Caustic tanks in Mold Cleaning area are now shipped for beneficial reuse instaed of neutralized and discharged. (3500 gallons & 2700 gallons)

Effluent flume flow printout 7am only - reduced paper use, saves $360/yr

Plan to remove lab and bathrooms in Bright Polish area in 2009

DI and RO units are regenerated and discharged to clarifier.

Chrome plant decommisioned second half 2006 and early 2007.

C-11/11

Fact Sheet Permit # FAY10
Marshalltown Tools

FILE COPY

	Neutralization Sedimentation			coolant.	
E.	**Effluent Limitations**				
E1.	**Categorical Limitations**		**E2.**	**Local Limitations**	
	40 CFR 433.17 (Using combined wastestream formula, 57% process water) Limits are in mg/l.			These are not applied to permitted Significant Industrial Users.	
	Parameter	Daily Max / Monthly Avg		Parameter	Instantaneous Max mg/l
	Cd	0.06 / 0.04		As	0.68
	Cr	1.58 / 0.98		Cd	0.02
	Cu	1.93 / 1.18		Cr	0.48
	Pb	0.39 / 0.25		Cu	0.23
	Ni	2.27 / 1.36		CN	0.01
	Ag	0.25 / 0.14		Pb	0.15
	Zn	1.49 / 0.85		Hg	0.0002
	CN	0.69 / 0.37		Ni	0.2
	TTO	1.22 / ---		Ag	1.23
				Zn	1.52
E3.	**Allocations (from TBLL0298 + allocations.xls)** Limits are in lb./day		**E4.**	**Other Limitations (specify, such as performance based, State limits, etc.):**	
	Parameter	Daily Max		Performance based limits were not calculated because this is a low flow industry with minimal treatment so they cannot optimize treatment.	
	Cd	0.001			
	Cr	0.261			
	Cu	0.121			
	Pb	0.046			
	Ni	0.095			
	Ag	0.640			
	Zn	2.295			
	CN	0.016			
	TTO	---			
E5.	**Rate & frequency of discharge; avg. & max. daily flow**				
	Location MTT001, typically discharge 24 hour/day, 5 days/week Avg. daily discharge = 0.006 MG Avg. monthly discharge = 0.121 MG Max. monthly discharge = 0.354 MG				
	Estimated discharge in 5 years (2013): 0.005 MGD				
E6.	**Discharge Location(s) – Location designation, description of discharge, specific location, and where to sample**				
	Location 001 shall consist of all facility combined wastestreams including wastestreams from dust collectors, etching neutralizer, washing, grinding, painting, the vibrating finisher, and from domestic waste. The permitted point of discharge shall be in the manhole located 221 feet east of the loading dock on the east side of the phase I building. The quality of the effluent discharged from Location 001 shall, at a minimum, meet the limitations set forth in Part E7 below.				

AMERICAN INTERPLEX CORPORATION
LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: CH2M Hill OMI
Project Reference: Fayetteville
~~Project~~ Manager: Bruce Richart
Sampled By: Donna McChristian
PO No.: credit card

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	SAMPLE MATRIX: WATER	SOIL	NO OF BOTTLES	Cd (cadmium)	Cr (chromium)	Cu (copper)	Pb (lead)	Ni (nickel)	Ag (silver)	Zn (zinc)	Remarks
6	AYR-001	091409 / 0910 → 1448		X	X		1	X	X	X	X	X	X	X	
7	EPC-004	091409 / 0855 → 1400		X	X		1		X	X	X	X		X	
8	KDT-001	0847 091509 → 0846 091609		X	X		1	X	X	X	X	X	X	X	
9	MTT-001	0908 091509 → 0903 091609		X	X		1	X	X	X	X	X	X	X	
10	CPC-001	091509 / 0934	X		X		1	X	X	X	X	X	X	X	
11	SUP-005	0910 091709 / 0908 091809		X	X		1	X	X	X	X	X	X	X	
		Container Type					P	P							
		Preservative					N	N							

ANALYSES REQUESTED

AIC CONTROL NO: 132455
AIC PROPOSAL NO:
Carrier: Fed-X
Received Temperature C: 2
Field pH calibration on _____ @ _____
Buffer:

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

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: Bruce Richart
Phone: 479-443-3292 Fax: _____
Report Attention to: Bruce Richart
Report Address to: 1400 N. Fox Hunter Rd Fayetteville AR 72701

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	092209 - 1200		
Relinquished By:	Date/Time	Received in Lab By: Angie Hopton	Date/Time 9-23-09 0830

Comments: Please analyze and report using detection limits as required by ADEQ

AMERICAN INTERPLEX CORPORATION
LABORATORIES

FILE COPY

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: CH2M Hill OMI
Project Reference: Fayetteville
~~Project~~ Manager: Bruce Richart
Sampled By: Bruce Richart, Donna Rochester

PO No.: credit card
SAMPLE MATRIX

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL	NO OF BOTTLES	ANALYSES REQUESTED: Oil & Grease	ANALYSES REQUESTED: CN-
1	EPC-004	091409/0857	X		X		1	X	
2	KDT-001	091509/0851	X		X		1		X
3	MTT-001	091509/0908	X		X		1		X
4	CPC-001	091509/0934	X		X		1		X
5	SUP-005	091709/0908	X		X		1		X
		Container Type						G	P
		Preservative						S	B

AIC CONTROL NO: 132455
AIC PROPOSAL NO:
Carrier: Fed-X
Received Temperature: 2 °C
Remarks

Field pH calibration
on _____ @ _____
Buffer:

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

Turnaround Time Requested: (Please circle)
(NORMAL) or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: Bruce Richart
Phone: 479-443-3292 Fax: _____
Report Attention to: Bruce Richart
Report Address to: 1400 N. Foxhunter Rd
Fayetteville AR 72701

Relinquished By:	Date/Time	Received By:	Date/Time
	092209 - 1200		
Relinquished By:	Date/Time	Received in Lab By: Lugra Hopton	Date/Time 9-23-09 0830

Comments:

Excerpt Pinnacle Foods

PART I - SPECIFIC CONDITIONS, LIMITATIONS, AND REQUIREMENTS

SECTION A. WASTESTREAM LOCATIONS

Location 001

This wastestream shall consist of the treated wastewater from all processes. The monitoring point shall be just upstream of the flume that is located in the southwest corner of the waste treatment building, which is on the north side of the property. The quality of the effluent discharged from Location 001 shall, at a minimum, meet the limitations as set forth in Table I-1.

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to discharge from **Location 001** except for flow usage, which applies as specified in the Table I-1 footnotes. The Permittee shall monitor the discharge from **Locations 001** and the incoming water usage, and shall be limited as specified below:

Table I-1

	LIMITATIONS[1]			MONITORING REQUIREMENTS	
Parameter	**Daily Maximum**	**7-Day Average[2]**	**Monthly Average[3]**	**Frequency[4]**	**Sample Type**
BOD	Report	Report	Report	3/week	24-hr composite
TSS	3,302 lb.	2,230 lb.	Report	1/Week	24-hr composite
Phosphorus	Report	NA	Report	1/Week	24-hr composite
Oil & Grease	NA	NA	Report	1/Month	Grab
pH	([5])	NA	NA	3/Week	Grab
Flow, Usage[6]	Report	NA	Report	Continuous	Totalizer[7]
Flow, Discharge	2.4 MGD	NA	2.0 MGD	Continuous	Totalizer[7]

[1] It is the Permittee's responsibility to ensure test detection levels are sufficiently low to demonstrate compliance with permit limitations. If an analytical result is below the laboratory detection limit, then the detection limit shall be used in the calculation of pounds unless permitted otherwise by the Control Authority.

[2] 7-Day Average is the average of all daily results in a calendar week, Sunday through Saturday, regardless of the number of samples analyzed.

[3] Monthly average is the average of all daily results in a calendar month regardless of the number of samples analyzed.

[4] Week means Sunday through Saturday. Month means calendar month. For composite samples, the date of the sample is the date that sample collection is started.

[5] Within the range 5.0 to 12.5 standard units.

[6] Usage flow (incoming water) shall be measured at the city water meter on the south side of the property.

[7] Measure continuously with a flow meter with a totalizer. Report daily flow for water usage and wastewater

Marshalltown Company
Arkansas Operations
Fayetteville, AR

Accidental Spill Prevention Plan
ASPP
(includes Stormwater Pollution Prevention Plan)

+ TOMP

Rec'd 3-10r-08 with application SS G-1/23

TABLE OF CONTENTS

SSUG Plan in this section

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1.0 INTRODUCTION

1.1 The Marshalltown Company, Fayetteville plant is located in Section 23, Township 16 North, Range 30 West, Washington County, Arkansas. The plant is on a 14 acre site with approximately 91,000 SF under roof. Figure 1 shows a vicinity map for the facility.

The Marshalltown Company operation is classified as a hand tool manufacturer (SIC 3423). This facility manufactures hand tools to supply various hardware retailers. Hand tools are subjected to various machining processes during the manufacturing cycle. Because certain water priority pollutant chemicals are included in solid components of products in their manufacturing process, the Marshalltown Company operation is considered to be a SARA Title III Section 313 facility. Because this facility is considered to be a SARA Title III facility, specific containment and spill prevention measures are required as part of the Accidental Spill Prevention Plan (ASPP) which encompasses storm water, toxic organic management, and the sanitary sewer. The ASPP will include, but is not limited to the following: 1) references to the list of the type and quantity of chemicals stored on site (information in annual report supplied by Vanguard Environmental), 2) the present and planned spill containment measures that have, and will be taken to confine them, and 4) all drainage areas and their direction of flow which are shown on the site map.

Marshalltown Company has an average daily discharge of water of approximately 6,000 gallons. The pretreatment standards applicable to this facility are 40 CFR 403-433 and Chapter 51 City of Fayetteville Code of Ordinances.

Marshalltown Company has four main production flows. These are the production of trowels, the production of taping knives, the assembly of rubber floats, and the assembly of magnesium floats. These production flows can be seen in Figure 2.

Marshalltown Company located at 2200 Industrial Drive, Fayetteville, AR 72701 operates 24 hours a day. There are 80 employees on 1st shift, 40 employees on 2nd shift, and 20 employees on 3rd shift.

1.2 Spill Prevention Plan

This Accidental Spill Prevention Plan (ASPP) is specifically designed for Marshalltown Company, located at 2200 Industrial Drive, Fayetteville, AR 72701. It is comprised of the elements necessary for a complete and comprehensive ASPP. The plan was developed using good engineering practices. It addresses potential pollutants entering the storm water discharge and the sanitary sewer as well as a best management plan to contain, reduce, and eliminate the contaminants at the source.

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2.0 PLANNING AND ORGANIZATION

2.1 Pollution Prevention Team

Marshalltown Company has a pollution prevention team that is comprised of representatives from plant management, production, engineering, and other relevant fields. The team is responsible for insuring the proper implementation of the Accidental Spill Prevention Plan. The members of this team will act as contacts and emergency response coordinators in the event of a spill. The functions of the team include, but are not limited to, the following:

- Coordination of plan development, implementation, annual evaluation, and revisions.
- Conduct training programs to all involved employees.
- Maintain proper record keeping.
- Identification of all process changes and revisions, and initiate notification to proper authorities (if applicable.)
- Implementation of preventative maintenance program.
- Spill response.
- Proper housekeeping.

The members of the team and their responsibilities have been defined to avoid any confusion or misunderstanding. If the need arises, these responsibilities will be modified and the ASPP changed accordingly. The team members and responsibilities are as follows:

Coordinator: Robert O'Connell **Title:** Manager of Manufacturing Engineering
Work Phone: (479) 521-8787, ext. 150 **After Hours Phone:** (479) 521-0188
Responsibilities: 1) Coordinate plan development and implementation. 2) All signature responsibilities. 3) Assure all reports are submitted and make sure all reports are updated when necessary. 4) Maintain the list of potential pollution sources and activities that risk their safe containment. 5) Assign duties to individual members of the team necessary for maintaining this Accidental Spill Prevention Plan and insuring its integrity. 6) Maintain the Waste Water Discharge permit including coordination of sampling and testing, reporting, recordkeeping and investigations. 7) Coordinate sampling, testing and reporting for Storm Water Industrial permit.

Member: Nick Palermo **Title:** Facility Engineer
Work Phone: (479) 521-8787, ext. 163 **After Hours Phone:** (479) 445-6702
Responsibilities: 1) Emergency contact in case of spill or condition that could lead to a spill. 2) Oversee facility conditions to prevent storm water pollution or spills from entering the sanitary sewer. 3) Accident investigation in the event of a spill. 4) Develop and update training programs and insure the annual training of all appropriate employees. 5) Maintain records of spill incidents, employee training, and site inspections.

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Member: Daryl Quinton **Title:** Factory/Maintenance Manager
Work Phone: (479) 521-8787, ext. 198 **After Hours Phone:** (479) 435-1538
Responsibilities: 1) Oversee facility conditions to prevent storm water pollution or spills entering the sanitary sewer. 2) Assure that proper maintenance procedures are followed and records maintained. 3) Inspect and maintain records of all hazardous material containment areas. 4) Oversee proper handling of hazardous material used in production.

Member: Russell Willits **Title:** Maintenance Lead
Work Phone: (479) 521-8787, ext. 107
Responsibilities: 1) Oversee material storage and disposal. 2) Responsible for conducting all storm water and drain testing that must be performed. 3) Assure that containers are the proper type and correctly labeled.

Member: Sabrina Mounce **Title:** Receiving Clerk
Work Phone: (479) 521-8787, ext. 155
Responsibilities: 1) Oversee incoming material. 2) Be sure proper labeling is applied and that proper handling practices are followed. 3) Oversee disposal of hazardous material shipment paperwork and preparation.

Member: Kenny Couch **Title**: Production Supervisor
Work Phone: (479) 521-8787, ext. 108
Responsibilities: 1) Oversee proper handling of hazardous material used in production.

2.2 Other Existing Environmental Management Plans

Marshalltown Company has other plans existing which have relevance to the Accidental Spill Prevention Plan. These plans include the following:

Emergency Response Contingency Plan. This plan will be referred to in the Accidental Spill Prevention Plan. It outlines what to do in the event of a spill. It lists all phone numbers of resources to contact for assistance with spill containment and a list who has to be notified in the event of a spill and the time when they have to be notified. This plan is found in Appendix B.

Hazard Communication Plan. This plan covers the OSHA requirement that all employees be aware of hazardous materials in the facility.

Hazardous Material Handling Training. All material handlers are trained in proper handling of hazardous materials. This training includes how to recognize hazardous labeling, special precautions to be taken when handling hazardous material, and what steps to take in the event of a spill.

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3.0 POLLUTION SOURCE ASSESSMENT

A site map containing all chemical storage locations, possible spill locations, existing spill containment measures, all fire alarm pulls, fire extinguishers, drains, phones, is included in Figure 3.

3.1 Drainage and Watershed Identification

The site drainage pattern and all structures such as buildings, parking areas, and parking decks have been incorporated into a site map (attached Figure 4). The surface runoff, as well as storm drains, are shown throughout the property boundary. As shown in Figure 4, the natural terrain of the property and existing structure divides the property into three watersheds. There is an out-fall associated with each watershed and the out-falls are designated as 001, 002, and 003 on the site map. Each watershed is unique with respect to its drainage pattern, industrial activity, and potential pollutants. The watersheds are described in detail in the following paragraphs.

1. Watershed WS-1: The area in this watershed primarily consists of grassy areas. The total acreage of the area is approximately 8.5 acres of which 1.3 acres is parking area. The remaining 7.2 acres is lawn and undeveloped lands. All runoff from this watershed drains into a ditch at the east end of the property designated as out-fall 001.

2. Watershed WS-2: The southern half of the main plant roof drains to this watershed area. The total acreage of the watershed is 0.887 acres. All runoff from this watershed drains into a ditch at the south end of the property designated as out-fall 002.

3. Watershed WS-3: This watershed consists of the northern half of the main plant, employee parking lot, as well as undeveloped land. The total area is 5.0 acres of which 2 acres is lawn and undeveloped land. All runoff from this watershed is drained into a storm sewer manhole located at the west side of the property and designated as out-fall 003.

The following table shows a summary of each watershed:

WATERSHED	OUT-FALL	PERVIOUS AREA (ACRES)	IMPERVIOUS AREA	TOTAL
WS-1	001	7.2	1.3	8.5
WS-2	002	0.07	0.80	0.87
WS-3	003	2.0	3.0	5.0
TOTAL		**9.77**	**4.6**	**14.37**

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3.2 Potential Storm Water and Sanitary Sewer Pollution Sources

The following is a list of potential pollution sources that was developed by close review of Marshalltown Company Material Safety Data Sheets:

- Flammable Materials Storage Building (Gas House)
  This is a masonry block structure specifically designed for storing flammable materials. Spills inside the building are contained by an 8 inch curb entirely along the building perimeter. The building capacity is sufficient for all expected flammable materials storage requirements, including empty drums waiting disposal. Dispensing into smaller FM approved safety containers for transfer into the manufacturing plant is also performed here.

- Courtyard
  Handling of hazardous liquid materials within the courtyard area creates the greatest potential for an accidental spill and the resulting runoff into the storm water discharge system. Access to the storm water system for spilled materials within the courtyard is by the storm water drains for the truck doors at the southwest corner of the manufacturing plant. This storm water discharge system off-falls to the surface on the east side of the manufacturing plant. Handling activities within the courtyard include:
  1. Transferring hazardous material containers between the gas house and the manufacturing plant.
  2. Transferring drums of hazardous wastes from the gas house to a truck operated by the hazardous waste receiver.
  3. Storage of magnesium chips in closed top barrels, magnesium sludge in closed top barrels, and scrap metal waiting disposal or recycling.

  This is not a significant contributor to storm water pollution if drums are covered, spilled material is promptly cleaned up, regular inspections are conducted, and all handlers are trained in proper handling and housekeeping (see training section for more information.) A spill response kit containing absorbent socks and mats is located inside the gas house. This provides rapid response for spills in the courtyard area.

- Truck Docks
  All truck docks on the west side of the manufacturing plant are served by drains connected to the storm water discharge system. A valve to close the drain exit pipe has been installed. The lever to operate the drain valve is located south of the truck dock approximately 3 feet from the guardrail and 6 feet from the building. The Maintenance Department PM program regularly tests this valve's operation. The training program emphasizes

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the extreme care that must be exercised while off-loading hazardous materials at the truck docks to minimize any risk of a spill (see training section for more information). The valve is for protection against a spill getting to surface water. Trained personnel would close this valve if a spill occurred.

- Employee Parking
  The employee parking lots drain to Watershed 1 and Watershed 3. These lots might have oil or other motor drainage caused by normal parking use. Small amounts of these products could run off from the parking area to the watersheds.

- Rooftop Air Conditioners
  Marshalltown Company has eleven air conditioning units on the roof that use lubricating oil in their compressors. Each unit holds one gallon of oil. Any non-storm water discharge that is observed in out-fall 002 or out-fall 003 could be from a leak on the roof. Regular checks and maintenance are performed on the units.

A spill in the following areas could only affect the sanitary sewer and would have no potential to affect the storm water runoff:

- Unheated storage warehouse
  The southwest area of the unheated storage warehouse has a rack 8 ft. wide by 15 ft. tall for combustible liquid drum storage. This rack has a 150 gallon capacity catch basin and the drain nearest the rack has been plugged to prevent spills from entering the sewer. The rack is grounded so transfer of liquid to smaller containers can take place.

- Maintenance
  The maintenance area is the location for another rack that contains combustible liquid drums. The rack is grounded so transfer of these liquids can take place here. A 150 gallon catch basin is located at the base of this rack to catch any spills. The nearest drain is over 20' away. Absorbent socks and absorbent material are located in the maintenance area.

- Vibratory Tumbler
  The vibratory tumbler is where Almco cleaning chemicals are used. There is a trench drain surrounding the tumbler. Operators at this machine are informed of proper handling procedures and the procedures to follow to prevent a spill from entering the sanitary sewer (see training section for more information) and warning signs are posted.

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- Wet Dust Collectors
  There are 9 wet dust collectors in use in the manufacturing facility. Under normal usage these do not pose any threat to the sanitary sewer. When the collectors are cleaned, caution is taken to assure than no metal particles are released to the sanitary sewer. Operators that clean the collectors are trained in proper cleaning procedures (see training section for more information), and records are kept of all cleaning and maintenance that takes place on the collectors.

- Glue Line
  Chemical containers at the glue line are placed inside sealed dispensing units which would prevent a spill from entering the drain. Operators at this station are trained in proper handling and material transfer procedures (see training section for more information). The trench drain in this area has been covered.

- CNC Machining Area
  The trench drain in this area has been covered. The operator has been trained in the methods to safely clean the area.

- Receiving:
  The two drains in the receiving area by the dock doors have been plugged to prevent spills when unloading materials. There is a spill kit located in this area and all receiving clerks and fork truck operators are trained in spill response and proper handling procedures (see training section for more information.)

All areas located in the plant where there is potential for spills to contact the sewer have been protected with appropriate best management procedures and engineering controls to prevent a spill or contain a spill if one should occur.

3.3 Material Inventory

The material inventory is compiled by a careful study of the Material Safety Data Sheets on an annual basis by Vanguard Environmental. This inventory lists all the material with the potential of coming in contact with the storm water or the sanitary sewer. Plant locations of hazardous material are marked on attached Figure 3. These locations are where the chemicals are stored and used. The maximum volume is always given in pounds. Chemicals are ordered so the period of storage is as short as possible. Many of the products used will be consumed in a period shorter than a year. No chemicals are stored longer than expiration dates on the containers. All SARA 313 reportable chemicals and the percent contained in the product are given as well as other chemicals contained in the product.

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3.3.1 Inventory of Toxic Organic Pollutants

Toxic organic pollutants are included in the annual report compiled by Vanguard Environmental.

3.4 Past Leaks and Spills

Figure 5 is provided for recording purposes of all significant spills.

3.5 Non-Storm Water Discharge

There are no cross connections between the non-storm water drain system and the storm water ditch or piping systems. All site generated water is drained into the sanitary sewer.

3.6 Existing Spill Prevention Equipment and Procedures

The gas house has an 8" curb entirely along the building perimeter. This building is sufficient to store all expected flammable materials including empty drums and waste waiting disposal.

The trench drain at the southwest truck docks is equipped with a shut-off valve. This valve allows the drain to be closed in the event of a spill when off loading trucks to allow the spill to be cleaned up before it enters the storm water.

The oil storage area of the unheated storage warehouse has a 150 gallon catch basin on the floor beneath the storage rack. The floor of the warehouse slopes to a sewer drain which has been plugged to prevent spills over 150 gallons from reaching the sewer.

The oil storage area at maintenance has a 150 gallon catch basin under the storage rack to contain spills. This rack is located over 20' from the nearest sewer drain. Absorbent socks and absorbent material are stored near this rack.

Appropriate drum handling equipment is provided at all areas where transfer of chemical drums takes place. Two wheel carts are provided for manual transfer. Drums are handled and stored on pallets in the plant before being placed in racks to prevent moisture from the ground or floor from reaching the drum. Pallets are not used in the gas house because of the fire hazard. Drums in the gas house are checked periodically for corrosion or damage.

Collision protection and base supports are located on all racks where chemicals are stored to prevent accidental collisions or spills.

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Warning signs are posted at the gas house, maintenance and receiving to inform handlers of precautions to be taken with chemical containers to prevent spills.

All chemicals are labeled with HMIS labels and warning labels when they are received.

All transfer of chemicals is performed by personnel that have received training in proper hazardous handling methods. See section on training for more information.

All dispensing drums located in the plant have drip pans preventing valve leaks from reaching drains.

All areas where liquids can splash onto the floor have absorbent material for operators to contain liquid and also to prevent slipping hazards.

Intersections with vision obstructions have overhead mirrors to prevent collisions.

All storage containers and valves are appropriate for the material that they contain. All containers are labeled with the material that is to be kept in them. (Thinner containers, jugs to transfer rust inhibitor, etc.)

All existing floor drains that do not drain to the sewer have been permanently sealed to avoid contaminants coming into contact with storm water.

All outside storage areas are fenced and/or locked when the facility is not operating. The facility has a security system to notify of unauthorized entry.

Signs are posted indicating proper pretreatment of process waste prior to discharge into the sanitary sewer.

3.7 Existing Spill Containment Equipment

Spill kits are located in the gas house, at receiving and throughout the facility.

Absorbent socks and absorbent material is located strategically throughout the plant and absorbent material is located at every machine that has the possibility of liquid spilling.

Brooms and dust pans are located at all stations to sweep any spills that may occur.

Absorbent material is available for use at the cooling tower and dikes of absorbent are always built around the area when ethylene glycol is added.

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Collected spills will be placed in appropriate containers to be disposed of properly.

Throughout the facility, potential pollutants are stored under roof.

3.8 Methods of Disposal

Marshalltown Company has 6 categories of waste that are picked up by waste disposal companies. The waste streams are divided as follows:
Waste Stream #1 is thinners including DAYCO LACQUER THINNER. Waste Stream #2 includes R66 and METALGUARD 170. Waste Stream #3 is coolants. Waste Stream #4 is oils including Mobil oils. Waste Stream #5 is SUPER AGITENE. Waste Stream #6 is Oily Absorbent and Debris. These waste streams are collected by Univar USA, Inc (EPA ID number OKD987071156)4500 N. Peoria, Tulsa OK 74106.

Waste products are stored in DOT approved steel drums in the gas house until they can be collected.

4.0 BEST MANAGEMENT PRACTICES

Best management practices (BMP) are measures used to prevent or mitigate pollution from any type of activity conducted at the facility. Management has identified those practices that will effectively reduce the potential for storm water pollution and spills reaching the sanitary sewer. These practices are discussed in detail below.

4.1 Good Housekeeping

Good Housekeeping practices are designed to maintain a clean and orderly work environment. A clean and orderly work area reduces the possibility of accidental spills caused by mishandling of chemicals and equipment in addition to reducing safety hazards to plant personnel. The removal of solid waste within the work area will reduce the potential of contact of these materials with storm water or sewer runoff. Outdoor areas are swept and picked up on a regular basis. Marshalltown's housekeeping policy follows:

- Every employee is responsible for housekeeping.
- Everything in our plant has a proper place, keep it there.
- Do not throw anything on the floor.
- Keep aisles clear at all times.
- Do not place materials where they block an exit, access to a fire extinguisher, electrical panel, or other emergency equipment.

- Dispose of your cigarette butts in a proper container, do not throw them on the ground.
- Keep you work area clean and orderly and leave it clean and orderly for the next shift.
- Immediately report to your supervisor any condition which could cause an accident and which you are not authorized to correct.
- Clean up spills, drips, or leaks immediately to avoid slips and falls.
- Help keep your break room and restrooms clean by properly disposing of trash.

This policy is included in initial employee training. Supervisors are responsible for seeing that the housekeeping policy is enforced.

4.2 Operation and Maintenance

Operation and maintenance practices ensure that processes and equipment are working well. Operation and maintenance procedures at the facility which are spill prevention oriented include the following activities:

- Dry and clean floors and ground surfaces are maintained by using brooms, dust pans and shovels.
- Garbage and waste materials are regularly picked up and placed in the solid waste containers.
- Supervisors and employees make sure all production equipment is working properly.
- Routine inspections for leaks or conditions that could lead to discharges of chemicals or contact of storm water with raw materials, intermediate materials, waste materials, or products is carried out.
- Ensure that spill cleanup procedures are understood by all employees.
- Procedures are established so individuals responsible for adding chemicals to operations are trained in proper handling procedures and the steps to follow in the event of a spill.

4.2.1 Record of Abnormal Discharges

Records are kept at all machines that could have an affect on the sanitary sewer. Discharges that are considered abnormal are dust collector cleanings, wash tank cleanings and changing the compressor cooling to city water. These records which show the date, the operation being performed, and the operator responsible for assuring that operations were done according to procedures are kept in the Maintenance area when completed.

4.2.2 Handling a Non Routine Discharge/Slug Load

A Slug Load is defined by City Ordinance as *Any discharge at a flow rate or concentration which could cause a violation of the prohibited discharge standards in this subchapter or any discharge of a* ***Non-Routine,*** *episodic nature, including but not limited to an accidental spill or non customary batch discharge.*

Put in Marshalltown terms this could be an accidental release of the glycol/water mix from the cooling tower, a spill of a concentrated chemical, or a drainage of a tank that is not done on a regular basis, (only once or twice a year) such as de-scaling the washer burner tubes.

In the case of a non customary discharge (not accidental) the POTW, (Sewer Plant) must be notified 48 hours, or more, before this discharge takes place if at all possible. The Facilities Engineer or his alternate will notify the proper people at the POTW, with estimated quantities, (Volume and Concentration), name of chemicals or process involved. Always check the pH value before discharge. It is to be between 6.0 and 9.0 pH.

In the case of an accidental discharge of the cooling tower glycol or a spill to a floor drain, the POTW must be notified immediately when the incident is discovered.

Determine if the spill is life or health threatening to employees and to take the necessary precautions to protect the employees. Employees dealing with a spill must remember to wear the proper PPE, (personal protective equipment), gloves, goggles, etc. and use the proper tools for spill clean up, such as non-sparking tools, proper type absorbents, neutralizers, etc..

The procedure to insure the incident is as short as possible and reported quickly is as follows:

- Stop the release as soon as possible by closing the valve on the equipment or blocking the drain that is receiving the spill. Drain blocking materials (plugs, or drain block sheeting) are located throughout the plant and in the maintenance department.
- Your immediate supervisor should be notified as quickly as possible.
- The supervisor is required to notify one of these employees:
  The Facilities Engineer
  The Manager of Manufacturing Engineering
- The supervisor must be able to report name of what was spilled or released and the quantity (Volume and Concentration) of the material that was spilled or released to one of these employees.

The POTW (Publicly Owned Treatment Works) is owned by the City of Fayetteville and operated under contract by Operations Management International, Inc. They are not City of Fayetteville employees. It is the responsibility of OMI to assure the plant is operating within the Federal Pollution Standards and thus anything that could bring the POTW out of compliance by entering the plant must be reported so that appropriate actions can be taken by OMI.

The Facilities Engineer or his alternate must report this information as soon as possible to the POTW by phone (443-3292) which is answered 24 hours a day. The regular contact between industry and the POTW is the Industrial Pretreatment Coordinator, Ms. Denise Georgiou.

If the incident occurs after hours the report can be made to the operator on duty. Be sure to get the operator's name.

The Facilities Engineer must make a report to the POTW in writing about the incident so details of the incident are important. While the details are still fresh in your mind write them down, note the time of day, the quantities involved, the type of release and the location, the chemical or chemicals involved and the length of time the incident occurred.

4.3 Material Storage Practices

Material storage practices can be implemented to reduce the possibility of spills or contamination to storm water. Marshalltown uses the following storage techniques:

- Adequate space to facilitate materials transfer and easy access for inspection has been provided.
- Containers, drums, and bags are stored away from direct traffic routes to prevent accidental spills.
- Containers are stacked according to manufacturers' instructions to avoid damaging the containers from improper weight distribution.
- Containers are stored on pallets or similar devices, when stored on the ground, to prevent corrosion of the containers which can result when containers come in contact with moisture on the ground.
- The responsibility of hazardous material inventory is assigned to a limited number of people who are trained to handle hazardous materials.
- Liquid storage racks have collision supports and are grounded for material transfer.
- All storage containers are the proper type for the chemicals contained in them and are labeled with all hazards.

- Material storage areas are routinely inspected for leaks or conditions that could cause a leak. Drums and containers are inspected for corrosion.

4.4 Material Inventory Procedures

Material inventory procedures are implemented to track how materials are stored and handled on site and identify what areas pose the greatest risk of a spill. The following procedures will be continuously adhered to at the facility:

- All existing materials have MSDS sheets available to all interested parties. MSDS sheets will be filed for all new materials when they are ordered. An inventory of all chemical substances, their storage locations, maximum amount on hand, container volume, and container type is included with this Accidental Spill Prevention Plan (report provided by Vanguard Environmental.)
- All containers will be labeled with HMIS standard information to show the name or type of substance and related health hazards.
- The chemical inventory will be clearly marked for hazardous materials that require special handling, storage, use, and disposal considerations.
- All inventory is tracked and all material moves will be entered into the tracking system. Location of all chemicals will be immediately available if needed. Oldest materials should be used first.
- Materials will be disposed of if they reach their expiration date.
- Materials will be ordered in appropriate quantities so they are not stored any longer than necessary and on hand inventory of chemicals is kept to a minimum.

4.5 Employee Training

Employee training is an important part of Marshalltown Company Spill Prevention Plan. The following are training methods and other ways used to encourage employee participation in spill prevention:

- Housekeeping Training
  1. Employees are informed of the housekeeping policy when they are hired.
  2. The policy is listed in the employee handbook and supervisors will cover specific housekeeping requirements when employees are assigned to a job.
  3. Supervisors encourage housekeeping practices.
  4. Periodical inspections of housekeeping practices are made and improvement needs are posted as well as given to the supervisors for correction purposes.
  5. Tool boards are provided at each area to organize needed tools.

6. Work Center boards show and keep all appropriate paper procedures and information, thus keeping papers out of the working area.
7. Proper disposal of waste is covered with all new employees and signs are posted at waste disposal areas.
8. Location of housekeeping equipment and absorbent materials is made known to all new employees.
9. Special housekeeping procedures are covered with employees at areas where there are possible sanitary sewer slug hazards.
10. Employees cleaning dust collectors use extreme caution to assure that metal particles don't contact the drain.

- Material Handling Training
  1. All employees that will be on a forklift must pass a comprehensive forklift training class and hands on certification as required by OSHA.
  2. This class will be given any time there is a new forklift operator.
  3. Records will be kept of the class and the score of the exam.
  4. Updates to the class will be administered as required by OSHA.
  5. All material handlers are given hazardous material handling training.
     - This class will cover all laws that govern hazardous materials including but not limited to RCRA, CWA, DOT, and OSHA regulations.
     - The class covers safety, how to recognize hazards, facility compliance requirements, accident prevention, exposure protection methods, drum sealing, emergency response measures, proper labeling, cautions to be taken when loading/unloading at the truck dock, reportable quantity of spills of hazardous materials, proper storage, spill prevention, minor spill procedure, and emergency spill procedure.
     - The class will be reviewed annually with all material handlers, receiving clerks, and supervisors.

- Special Operating Procedures
  1. All supervisors and operators who are involved with chemicals (washer operators, lacquer line operators, etc.) are trained in proper handling and operating methods.
  2. Covered in the training is proper transfer of hazardous liquid, container requirements, proper labeling, spill prevention, reporting requirements, personal protective equipment, first aid procedures, minor spill containment methods, and emergency spill procedure.
  3. Training is reviewed at least annually or more often if necessary.

4.6 Accident Investigation

Accident investigation is a method Marshalltown Company employees use to prevent future accidents. If there is a situation that has caused an accident or near accident it will be investigated and the findings will be reviewed by the safety committee. Figure 6 is the Incident Investigator Form. All spills will be investigated and a report written to prevent any further incidents. Figure 7 is the Chemical Incident Investigation Form that is to be filled out anytime an incident resulted in a significant release to the storm water or sewer, or an incident occurred that could have resulted in a significant release to the storm water or sewer. This form will be filled out within 48 hours of the incident by an incident investigation team that consists of at least one person knowledgeable in the process involved in the incident.

4.7 Preventative Maintenance

Preventative maintenance has been an important component of the Marshalltown Company scheme for many years. The Spill Prevention Plan expands these programs to include storm water and sanitary sewer considerations. Preventative maintenance involves the regular inspection and testing of plant equipment and operational systems. These inspections should uncover conditions such as cracks or slow leaks which could cause breakdowns or failures that result in discharge of chemicals. The program is designed to prevent breakdowns and failures by adjustment, repair, or replacement of equipment. The facility preventative maintenance program includes the following elements:

- Identification of equipment, systems, and facility areas that should be inspected (pipes, pumps, storage tanks, pressure vessels, pressure release valves, process and material handling equipment, and areas of the site that could generate potential contaminants such as sawdust or sediment.)
- Scheduled periodic inspections or tests of equipment, systems, or vulnerable site areas.
- Appropriate and timely adjustment, repair, or replacement of equipment, systems, or facilities.
- Maintenance of complete records on inspections, equipment, and systems.

4.8 Visual Inspections

Visual inspections are the responsibility of supervisors and lead personnel. The work site and all areas should be inspected on a regular basis. The inspection will include, at a minimum, each of the following areas:

- Areas around all of the equipment which contain or use any pollutants.

- Areas where spills and leaks have occurred in the past.
- Material storage areas.
- Material handling areas.
- Waste regeneration and storage areas.
- Storm water flow channels/concrete retention basin.
- Loading/unloading docks.

Where a visual inspection identifies a problem that could lead to or has led to storm water or sewer contamination, documentation of that event will be made. The documentation will note when the inspection was carried out, who conducted the inspection, what problems were identified, and steps taken to correct any problems, including who has been notified. The record of issue will be kept on file.

4.9 Sediment and Erosion Control

All drainage areas are vegetated with grasses to reduce sediment runoff from the site. Slopes at the site are very gentle, less than three percent (3%) over most of the surface. All runoff is strictly controlled to prohibit erosion.

4.10 Management of Runoff

The storm water runoff at this site is controlled by a drainage system. All open areas are landscaped for storm water management. Where possible, the exposed ground surface is revegetated where soil is exposed.

5.0 SPILL RESPONSE PROCEDURES

5.1 Overview

Establishing standard operating procedures such as safety and spill prevention procedures along with proper employee training can reduce accidental releases. Avoiding spills and leaks is preferable to cleaning them up after they occur. Spill response, however, may sometimes be necessary.

Marshalltown Company is prepared with spill response procedures to lessen the impact of a spill. Immediate spill response can prevent the spill from contacting storm water or entering the sanitary sewer. In place is Marshalltown Company Emergency Response Contingency Plan (Appendix B). This plan is incorporated into the Accidental Spill Prevention Plan. The following points of the plan are communicated to all employees:

5.2 Minor Spill Procedures

Minor Spills - A minor spill is one that poses no threat of escaping from the site. The amount spilled must be less than the reportable quantity (although this amount varies depending on the chemical, for our materials, use 10 gallons as a decision limit). Because of the urgency of any spill and the effectiveness of immediate response, it shall be the responsibility of the employee who causes or first discovers the spill to ensure that action is taken.

- The employee should first determine (possibly with the help of supervisors or trained personnel) if the spill is hazardous and what proper personal protective equipment should be used when containing the spill if it can be safely contained without any special equipment.
- The first step is to stop the leak and contain the spill.
- If the spill is on an impervious surface (concrete floor) the material will be contained with portable barriers or absorbent materials.
- If the spill is not on an impervious surface (the ground or graveled surface) the spill will be contained by means of berming the area with dirt handling equipment available at the site.
- Drains should be plugged or other methods used so material can not enter the sanitary sewer.
- When the spill is contained it should be reported to a supervisor and to the Spill Prevention Team Coordinator. The coordinator will determine if the spill can be diluted and flushed or if it should be contained and incinerated.

5.3 Emergency Spill Procedures

Emergency Spills - an emergency spill is one that poses a threat of escaping from the site. It is a spill that is over the reportable quantity. The Spill Prevention Coordinator will take responsibility for containing and reporting emergency spills.

- The first action should be to provide necessary personal protective equipment.
- The Spill Prevention Coordinator will determine if assistance is needed and contact any necessary help to contain the spill.
- Employees should be evacuated if necessary through the closest exit and they should gather in the parking lot where indicated on site map Figure 8.
- Stop the leak and prevent it from spreading with portable spill barriers or absorbent material.
- If the spill is a flammable material, all ignition sources should be removed from the area and all equipment that could cause a spark should be safely shut down.

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- Any incompatible materials in the area should be removed.
- If the spill is on an impervious surface (paved lot) the material will be contained with portable barriers or absorbent materials.
- If the spill is not on an impervious surface (the ground or graveled surface) the spill will be contained by means of berming the area with dirt handling equipment available on site.
- Determine requirements for disposal of the spill. If it is hazardous it should be treated and disposed of as a hazardous waste.
- If the spill is greater than the reportable quantity the appropriate authorities must be notified. The Spill Prevention Coordinator will contact the agencies listed in the Emergency Response Contingency Plan.

5.4 Spill Investigation and Documentation

After an accidental spill a complete investigation of the spill will be conducted to determine the cause and how it can be prevented in the future. The response to the spill will also be evaluated and any necessary changes made to the spill response procedures.

The investigation team will use the attached Figure 7 as a form to follow for their investigation. They should inspect all equipment involved for improper use or maintenance, they should talk to all the operators involved with the spill or the response, and they should assess the adequacy of the response methods.

Upon completion of the investigation and the form, the investigators will file a report detailing changes that need to be made to equipment, maintenance procedures, employee training, and spill response procedures. The report will be made available to all applicable agencies.

6.0 PLAN IMPLEMENTATION

6.1 Schedule of Implementation

A schedule will be developed for the implementation of the ASPP. The implementation schedule will be upgraded annually by the ASPP Team Coordinator. This update will include the ongoing employee training program and the establishment of specific training dates.

6.2 Employee Training Schedule

Employee training is essential to the effective implementation of the ASPP. The purpose of the training program is to teach personnel at all levels the responsibility, components, and goals of the ASPP. When properly trained,

personnel are more capable of preventing spills, responding safely and effectively to an accident if one occurs, and recognizing situations that could lead to storm water or sanitary sewer contamination.

A full employee training program for site safety and health is already in place. The ASPP will be instituted as a portion of this existing program. Figure 9 is a schedule of employee training that includes both health and safety as well as ASPP activities. This schedule will be upgraded annually by the ASPP Team Coordinator in conjunction with other personnel.

6.3 Sampling and Analysis

At present, Marshalltown Company conducts annual storm water sampling for the Discharge Monitoring Report (DMR). The results of the sampling are included in Appendix C.

7.0 PLAN EVALUATION

7.1 Record Keeping and Internal Reporting

The ASPP Team Coordinator will oversee an annual site compliance evaluation. The inspection forms used to conduct this evaluation are included in Appendix D. The purpose of this evaluation is to provide a basis for evaluating the overall effectiveness of the ASPP. In particular, the site evaluation will verify that the description of potential pollutant sources contained in the plan is accurate, and that the plan drainage map is accurate or has been updated to reflect current conditions, and that controls identified in the plan to reduce accidental spills are accurately identified, in place, and working. This evaluation will also identify where new controls are needed so they may be implemented and added to the ASPP. The ASPP Team Coordinator will keep records of each annual evaluation.

The site evaluation will follow the steps outlined below:

- Review the ASPP and draw up a list of those items which are part of materials handling, storage, and transfer areas covered by the plan.
- List all equipment and containment structures in the area covered in the plan.
- Review facility operations for the past year to determine if any more areas should be included in the original plan, or if any existing areas were modified so as to require plan modification. Change the plan as appropriate.
- Conduct inspection to determine (1) if all spill prevention measures are accurately identified in the plan, and (2) are in place and working properly.
- Document findings.
- Modify ASPP as appropriate.

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CITY OF FAYETTEVILLE, ARKANSAS
INDUSTRIAL WASTE DISCHARGE PERMIT

PERMIT NO. FAY03

Elkhart Products Corporation has been classified as an existing 40 CFR 468 Copper Former under Subpart A including parts 468.14 (c), (f), (h), (j), (p), and (q). In compliance with the provisions and conditions of the Discharge and Pretreatment Regulations in Chapter 51 of the Fayetteville Code, of 40 CFR 468, and with any applicable provisions of local, federal or State of Arkansas laws or regulations,

Elkhart Products Corporation
3265 Highway 71 South
Fayetteville, Arkansas 72701,

hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC Nos. 3498, 3351, 3366, and 3432 from premises located at the above address and through outfalls identified herein to the City of Fayetteville's POTW collection system in accordance with effluent limitations, monitoring requirements, compliance schedule, reporting requirements, and conditions set forth in this permit and in the Discharge and Pretreatment Regulations in Chapter 51 of the Fayetteville Code.

Noncompliance with any term or condition of this permit shall constitute a violation of the Fayetteville Code.

This permit shall become effective on **September 1, 2008** and authorization to discharge shall expire at midnight on **August 31, 2013**. The duration of this permit shall not exceed 5 years.

If the Permittee wishes to continue discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with requirements of the Discharge and Pretreatment Regulations subchapter of the Fayetteville Code, a minimum of 90 days prior to the expiration date.

Signed this 27th day of August, 2008

Approved By: DJurgens

David Jurgens, P.E.
Water and Wastewater Director
City of Fayetteville

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SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to discharge from **Location 004** except for flow usage, which applies as specified in the Table I-1 footnotes. The Permittee shall monitor the discharge from **Locations 004**, and the incoming water usage, and shall be limited as specified below:

Table I-1

Parameter	LIMITATIONS[1]				MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average[2]		Frequency[3]	Sample Type
	(mg/l)	(lb./day)	(mg/l)	(lb./day)		
Chromium, total	Report	0.02	Report	0.01	1/month in Apr & Oct	Composite
Copper, total	Report	0.09	Report	0.05	2/month	Composite
Lead, total	Report	0.07	Report	0.06	1/month in Apr & Oct	Composite
Nickel, total	Report	0.01	Report	0.01	1/month in Apr & Oct	Composite
Zinc, total	Report	0.48	Report	0.26	1/month in Apr & Oct	Composite
Oil and Grease	Report	8.96	Report	5.38	1/month in Apr & Oct	Grab
TTO, 40 CFR 468	Report	0.290	Report	0.151	NA	Certification[4]
Flow, Usage[5]	Report		Report		Continuous	Totalizer[6]
Flow, Discharge	Report		Report		Continuous	Totalizer[6]

[1] It is the Permittee's responsibility to ensure test detection levels are sufficiently low to demonstrate compliance with permit limitations. If an analytical result is below the laboratory detection limit, then the detection limit shall be used in the calculation of pounds unless permitted otherwise by the Control Authority. The EPA recommends the following detection limits in **micrograms** per liter (**ug/l**): 0.5 cadmium, 10 chromium, 0.5 copper, 0.5 lead, 0.005 mercury, 0.5 nickel, 0.5 silver, 20 zinc, 10 cyanide.

[2] Monthly average is the average of all daily results in a calendar month regardless of the number of samples analyzed.

[3] Week means Sunday through Saturday. Month means calendar month. The date and time of an individual grab sample is the date and time at which the sample is collected. The date of a composite sample is the date on which sample collection for the composite sample is started and stopped. The composite sample date will be one day if the composite sample is collected on one day, e.g. April 14, 2007, or two days if the composite sample is collected over two days, e.g. April 14-15, 2007. Monitoring by the Control Authority is not a substitute for monitoring required to be conducted by the Permittee in this permit unless the Control Authority notifies the Permittee in writing that specific monitoring by the Control Authority can be used to meet permit frequency requirements.

[4] Oil and Grease is analyzed as an alternative to TTO (Total Toxic Organics). The Permittee also has an approved Toxic Organics Management Plan (TOMP). Oil and grease monitoring as specified above and certification statements in each monitoring report are required in lieu of TTO monitoring. Any TTO analysis performed according to the methods in 40 CFR 136 must be submitted in the monitoring reports and is limited as specified in this table.

[5] Usage flow (incoming water) shall be measured at the city water meter in the northeast corner of the fenced area of the property.

[6] Measure continuously with a flow meter with a totalizer. Report daily flow for wastewater discharge on all

PART I - SPECIFIC CONDITIONS, LIMITATIONS, AND REQUIREMENTS

SECTION A. WASTESTREAM LOCATIONS

Location 001

This Location was previously a cleanout for sanitary wastewater from all domestic sources at the facility. This Location has been renovated and no access exists. There are no specific requirements in this permit regarding this wastestream.

Location 002

This wastestream shall consist of cooling tower wastewater. Location 002 shall be at the south end of the building in the waste treatment area after the sample tank. The specific point of discharge is at the connection of the cooling tower discharge pipe and the treated effluent pipe between the sample tank and the discharge to the sewer. There are no specific requirements in this permit regarding this wastestream.

Location 003

This wastestream shall consist of all process-generated wastewater, sanitary wastewater, and cooling tower system wastewater prior to mixing with the city wastewater collection system. Location 003 is outside the building in a manhole west of the west wall of the tube mill approximately 30 feet west of the pavement. This is the site of the old monitoring station. There are no specific requirements in this permit regarding this wastestream.

Location 004

This wastestream shall consist of the treated effluent of all process generated waste streams from the copper forming operations. Location 004 is at the south end of the building in the waste treatment area. The permitted point of discharge shall be in the sample tank after the v-notch weir at the end of the treatment process. The quality of the effluent discharged from Location 004 shall, at a minimum, meet the limitations as set forth in Table I-1.

Elkhart Products Corporation
1998
40 CFR 468 Copper Forming Point Source
40 CFR 468.14 Pretreatment Standards for Existing Sources

Updated Projected Average Daily off-lb from 70195 to 75,569 with information in letter postmarked 01-Mar-05 form Jerry Whieside of EPC.
70,569 Projected Average Daily off-lb in 5 years (Used for calculations)
55,000 Average Daily off-lb 63,000 Maximum Daily off-pounds
Increase of 5%/year over 5 years = 55000*1.05*1.05*1.05*1.05*1.05
= 70195

All data units are lb/day	Chromium		Copper		Lead		Nickel		Zinc		TTO		Oil & Grease	
	1 Day Max	Monthly Ave Max	1 Day Max	Monthly Ave Max	1 Day Max	Monthly Ave Max	1 Day Max	Monthly Ave Max	1 Day Max	Monthly Ave Max	1 Day Max	Monthly Ave Max	1 Day Max	Monthly Ave Max
(c) Drawing	0.037	0.015	0.161	0.085	0.012	0.011	0.163	0.107	0.124	0.051	0.055	0.028	1.700	1.020
(f) Annealing	0.545	0.223	2.356	1.240	0.186	0.161	2.380	1.574	1.810	0.756	0.806	0.421	24.800	14.880
(h) Alkaline Cleaning Rinses	1.854	0.758	8.006	4.214	0.632	0.547	8.090	5.351	6.152	2.570	2.739	1.432	84.280	50.568
(j) Alkaline Cleaning Bath	0.020	0.008	0.088	0.046	0.007	0.006	0.089	0.059	0.068	0.028	0.030	0.015	0.930	0.560
(p) Surface Coat	0.326	0.133	1.411	0.743	0.111	0.096	1.426	0.943	1.084	0.453	0.482	0.252	14.860	8.916
(q) Misc.	0.009	0.003	0.041	0.021	0.003	0.002	0.041	0.027	0.031	0.013	0.014	0.007	0.436	0.261
Total lb/1,000,000 off-lb	2.791	1.140	12.063	6.349	0.951	0.823	12.189	8.061	9.269	3.871	4.126	2.155	127.006	76.205
Total lb/Projected off-lb	0.197	0.080	0.851	0.448	0.067	0.058	0.860	0.569	0.654	0.273	0.291	0.152	8.963	5.378

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Elkhart Products Corporation *Projected growth = 5% per year = 1.05*1.05*1.05*1.05*1.05 = 1.28 Conversion Factor
Permit Limit Calculations Typical charge 20 days per month

Date	Total Flow gpd	Process Flow gpd	Process Flow g/month	TSS mg/l	TSS lb/day	pH s.u.	Cd lb./day	Cr lb./day	Cu lb./day	Pb lb./day	Ni lb./day	Zn lb./day	OG lb./day
01/04/96	10061	458	6581	173	0.660812	7.52			0.000382				
01/17/96		242		254	0.512643	7.63			0.000838				
02/01/96	9339	223	6527	203	0.377543	7.57			0.000166				
02/20/96		523		134	0.584484	7.63			0.000196				
03/01/96	11010	108	6059	72	0.064852	7.5			0.001020				
03/15/96		420		69	0.241693	7.58			0.000144				
03/21/96		198					0.000030	0.000050	0.000100	0.000200	0.001000	0.000300	0.063000
04/01/96	11135	130	6883	77	0.083483	7.51	0.000009	0.000079	0.000717	0.000423	0.008230	0.000556	0.071557
04/16/96		393		138	0.452312	7.58	0.000079	0.000088	0.000026	0.000524	0.001698	0.000528	0.121272
05/01/96	12994	354	11057	31	0.091523	7.94			0.000242				
05/15/96		244		66	0.134307	7.69			0.000016				
06/06/96	13427	495	12585	31	0.127977	7.72			0.000033				
06/25/96		564		58	0.272818	7.63			0.000136				
07/06/96	13316	581	12325	12	0.058146	7.53			0.001405				
07/17/96		348		20	0.058046	7.62			0.000636				
08/01/96	15700	410	12948	30	0.102582	8.32			0.000472				
08/19/96		496		24	0.099279	8.2			0.000476				
09/03/96	13094	720	15355	14	0.084067	8.45			0.000438				
09/17/96		882		52	0.382506	8.43			0.000294				
10/01/96	14677	740	9844	12	0.074059	7.65	0.000043	0.000093	0.000049	0.000494	0.001099	0.000592	0.117260
10/18/96		570		38	0.180644	8.45	0.000029	0.000071	0.000513	0.002044	0.001802	0.000723	0.199660
11/04/96	10913	702	6702	9.3	0.054449	8.03			0.000410				
11/19/96		272		64	0.145183	8.12			0.000286				
12/06/96	9184	601	6655	28	0.140346	7.52			0.000281				
12/16/96		131		22	0.024036	8.73			0.000096				
01/02/97	10758	299	8250	16	0.039899	8.23			0.000187				
01/20/97		392		32	0.104617	8.54			0.000157				
02/05/97	8542	521	9550	32	0.139044	9.02			0.000265				
02/17/97		537		28	0.1254	8.36			0.000300				
03/05/97	9010	370	6786	12	0.03703	8.26			0.000475				
03/20/97		332		8	0.022151	8.71			0.000091				
04/04/97	11242	335	8523	11	0.030733	8.63	0.000017	0.000042	0.000522	0.001109	0.001349	0.000671	0.153665
04/15/97		332		13	0.035995	8.92	0.000030	0.000042	0.000161	0.002218	0.001108	0.000327	0.091373
05/01/97	12484	557	8458	28	0.130071	8.7			0.000144				
05/19/97		386		44	0.141647	8.83			0.000235				
06/02/97	12197	344	13087	19	0.05451	8.63			0.000387				
06/16/97		942		17	0.133557	8.82			0.000668				
07/02/97	13748	598	9426	8.5	0.042392	8.74			0.000743				
07/18/97		328		10	0.027355	8.83			0.000129				
08/04/97	14406	278	6603	4	0.009274	8.85			0.000162				
08/19/97		314		23	0.060231	8.93			0.000558				
09/03/97	15029	185	7074	15	0.023144	8.3			0.000231				
09/16/97		412		1	0.003436	8.36			0.000027				
10/03/97	14239	438	6565	4.8	0.017534	9.13	0.000117	0.000117	0.000073	0.000365	0.000256	0.000146	0.091323
10/08/97		274					0.000011	0.000014	0.000114	0.002173	0.000754	0.000366	0.111973
10/16/97		480		7.3	0.029223	8.06	0.000120	0.000092	0.000560	0.000801	0.000160	0.000240	0.014011
11/04/97	15071	178	4816	30	0.044536	8.62			0.000448				
11/19/97		262		27	0.058997	7.78			0.000068				
12/01/97	11287	284	6718	13	0.030791	8.03			0.000019				
12/15/97		424		19	0.067187	7.58			0.000028				
Average	12203	412	8724	43		8.20	0.000049	0.000069	0.000322	0.001035	0.001746	0.000445	0.103509
Std Dev	2124	185	2799	53		0.52	0.000042	0.000031	0.000286	0.000806	0.002341	0.000195	0.050886
1.28 x (Avg+3StdDev)= Performance Monthly Limit*	23776	1237	21914	259	0	12.47	0.0002	0.0002	0.0015	0.0044	0.0112	0.0013	0.3279
Perf. Monthly Limit x 3.11/1.69 = Perf. Daily Limit								0.0004	0.0028	0.0081	0.0207	0.0024	0.6034
Allocation, lb/day							0.0013	0.0292	0.0925	0.0144	0.0108	0.0230	NA
Daily limit calc from from 40 CFR 468								0.1970	0.8513	0.0671	0.8602	0.6541	8.9627
Monthly limit calc from 40 CFR 468								0.0805	0.4480	0.0581	0.5689	0.2732	5.3777
Maximum, lb/day (historic)	15700	942	15355	254		9.13	0.0001	0.0001	0.0014	0.0022	0.0082	0.0007	0.1997
Permit Daily Limit**								0.0004	0.003	0.008	0.011	0.002	0.603
Permit Monthly Limit (Daily Lim x 1.69/3.11)***								0.0002	0.002	0.004	0.006	0.001	0.328
Verify Monthly Limit is less than or equal to Monthly limit calc from 40 CFR 468 (OK or Redo):								OK	OK	OK	OK	OK	OK
								Performance	Performance	Performance	Allocation	Performance	Performance

* Use the performance calculation as the monthly and back calculate daily because EPC is a small SIU with sampling required < 1/week. Also, 1.28 factor is projected growth of 5% per year for the next 5 years.
** The lesser of Performance Daily or Allocation or 40 CFR 468 calculation
*** Formula derived from State TBLL guidance dated 3/6/92, page 6
Those results that are equal to or greater than the calculated monthly avg limit are highlighted.

2005 Elkhart Product Corporation Permit Limits Calculations for modification request for new process and change in flow
Increasing number of tank change outs per day to ensure fresh chemical & efficient process
Changing rinse to continuous overflow
New alkaline cleaning process increase to full volume
Expect maximum volume of 9000 gpd
Because of these changes performance limits cannot be used until new data has been accumulated using the new treatment and the new processes.

	Cr	Cu	Pb	Ni	Zn	OG
Requested (by EPC) monthly average limits based on jar testing and a safety factor:	0.0100	0.0500	0.1500	0.1500	0.2600	7.5000
Requested monthly converted to daily lb/day	0.0184	0.0920	0.2760	0.2760	0.4785	13.8018
Allocation, lb/day	0.0292	0.0925	0.0144	0.0108	0.0230	NA
Categorical, lb/day	0.1970	0.8513	0.0671	0.8602	0.6541	8.9627
Most Stringent:	Requested	Requested	Allocation	Allocation	Allocation	Categorical
Daily Limit, lb/day (Most Stringent)	0.0184	0.0920	0.0144	0.0108	0.0230	8.9627
Monthly Average Limit, lb/day	0.0100	0.0500	0.0078	0.0059	0.0125	5.3777
Modification Permit Limits	Requested	Requested	Categorical	Allocation	Requested	Categorical
Daily Limit, lb/day Round to 2 decimals in permit	0.0184	0.0920	0.0671	0.0108	0.4785	8.9627
Monthly Average Limit, lb/day Round to 2 decimals in permit	0.0100	0.0500	0.0581	0.0059	0.2600	5.3777

Notes: Allocations based on original processes, so use part of safety factor for growth if needed where allocations are the most stringent limit.
Final limits (modification permit limits) cannot be greater than Categorical limits.
Pb - Some reserve pounds, allow categorical limits
Ni - No reserve pounds, only growth safety factor, use allocation (round all limits to 2 decimals to help here)
Zn - Good reserve pounds, allow requested amount
Include a reopener clause in the permit modifications to allow "...recalculate limitations after sufficient data..."

Historic flow from above table = 412 gpd Predicted max flow = 9000 gpd

less than	Cr	Cu	Pb	Ni	Zn	OG
EPC Demo TR 50 sample results from 1/19/05, mg/l	0.02	0.02	0.07	0.04	0.34	
EPC Demo Yarmet sample results from 1/19/05, mg/l	0.02	0.01	0.05	0.04	0.23	
TR 50 calculated pounds using new predicted flow, lb/day	0.0015	0.0015	0.0053	0.0030	0.0255	
Yarmet calculated pounds using new predicted flow, lb/day	0.0015	0.0008	0.0038	0.0030	0.0173	

City of Fayetteville P2 Activity*

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- In 1993, Fayetteville's Industrial Pretreatment Program Department began presenting Annual Industrial Awareness Seminars to educate users on Fayetteville's Biological Nutrient Removal plant, plant loadings, potential inhibition, watershed issues, and IPP issues and regulations.
- Pretreatment personnel were key players when City of Fayetteville and Washington County had its first Household Hazardous Waste Collection Event in 1994, which evolved into semi-annual events and eventually into permanent recycling facilities.
- In 1995, initiated a 30-day sample save program for critical industrial users and an in-house sample save program for POTW influent and effluent for investigative purposes in tracking pollutants.
- Began forwarding "Items of Interest" to IUs on regulations and pollution prevention in 1995.
- Added a requirement for pollution prevention assessments to SIU permits starting in 1996. Results from a first assessment spurred a permanent in-house pollution prevention group for one industrial user.
- Held specialty seminars, assisted with bringing other specialty seminars to the area, and worked on publicizing the events to a targeted audience to pull in large crowds – Photographers Options for Silver Recovery; ADEQ's Silver & Mercury Workshop; Carpet Cleaners' Discharge Issues, MPM Workshops, Hospitals for a Healthy Environment.
- Developed performance-based the industrial waste discharge permit limits to limit unnecessary pollutant load allowances.
- IPP personnel worked as part of a Pesticide Education Group to present pesticide issues to various civic groups. Presented pesticide issues to the City of Fayetteville Environmental Concerns Committee.
- Provide pollution prevention information, flyers, and education through POTW tours, booths at public events, and through a portable 9-hole miniature golf course with each hole representing a wastewater treatment process used at public events and at schools.
- Pollution prevention is discussed with SIUs during annual inspections and with other IUs during tours, inspections and industrial walk throughs.
- Pollution prevention presentation by Fayetteville pretreatment personnel at EPA Region VI Annual IPP Workshop in 2007

* Pretreatment Audit: October 2009

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- Notified industrial users of potential 40 CFR 503 regulations for molybdenum and two industrial users voluntarily eliminated molybdenum based lubricants.
- Metals loadings to the POTW have remained stable because of education, P2 assessments, and performance-based limits.
- Frozen Foods Producer, SIU
  Changed chill water to city water (reduced cooling energy), steam optimization, new fail-closed valves, put on quickwater units, solenoid valves on tray dispenser blow offs, square cooker chill water over flow reduction, solenoid valves/empty carton blow-offs, turning boiler off on non-production days, valves for the chill water supply system and changes in cleaning procedures. Also cleanup training, and changes in treatment and waste handling.
- Circuit Board Assembler, SIU
  Installed variable speed air compressor and intermittent run air dryer. These units replaced older continuous run, single-speed units.
- Metal Finisher, CIU
  Batch dryer to dewater filter cake.
  Recycling sludge from clarifier resulted in reduction of ferric chloride and sodium hydroxide use, a reduction in hazardous waste and a reduction in energy use.
  Three separate water reduction projects.
- Annual Industrial Awareness Seminars for SIUs have helped maintain metals loadings, stabilize organic loadings, and keep both industries and POTW personnel aware of pollutant changes and issues.

Excerpt "EPA Industrial User Permitting Guidance Manual"

TABLE 7-6. EXAMPLE OF FACT SHEET DOCUMENTING DETERMINING THE MOST STRINGENT DAILY MAXIMUM EFFLUENT LIMITS

Parameter	Daily PSES	Monthly PSES	Daily CWF	Monthly CWF	Local Daily Limit	Daily Final Limit	Monthly Final Limit
Cadmium	0.69	0.26	0.46	0.17	0.1	**0.1**	--
Chromium (Hex)	--	--	--	--	0.1	**0.1**	--
Chromium (Total)	2.77	1.71	1.85	1.14	1.0	**1.0**	--
Copper	3.38	2.07	2.26	1.38	5.0	**2.26**	**1.38**
Cyanide	1.20	0.65	*	*	2.0	**1.20 ***	**0.65 ***
Lead	0.69	0.43	0.46	0.29	0.1	**0.1**	--
Manganese	--	--	--	--	1.0	**1.0**	--
Mercury	--	--	--	--	0.005	**0.005**	--
Nickel	3.98	2.38	2.66	1.59	2.0	**2.0**	**1.59**
Silver	0.43	0.24	0.28	0.16	0.1	**0.1**	--
Zinc	2.61	1.48	1.74	0.99	5.0	**1.74**	**0.99**
TTO	2.13	--	1.42	--	1.0	**1.0**	--

Note: All concentrations are in mg/l unless otherwise noted.

Key:

PSES - *Pretreatment Standards for Existing Sources, metal finishing category [40 CFR Part 433.15(a)]*

CWF - *Alternative metal finishing standards after use of combined wastestream formula*

Local Limit - *Maximum pollutant concentrations established by the Control Authority*

Final Limit - *Final limits based on most stringent of local, State, and Federal standards*

* *Cyanide limits shall apply to the segregated cyanide wastestream of the cyanide destruct treatment process.*

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Excerpt from Chapter 51

(m) Sludges, screenings, or other residues from the pretreatment of industrial wastes;

(n) Medical wastes, except as specifically authorized by the Control Authority;

(o) Wastewater causing, alone or in conjunction with other sources, the POTW to violate its NPDES permit or the treatment plant's effluent to fail a toxicity test;

(p) Any substance which may cause the POTW's effluent or other product of the POTW such as residues, sludges or scums, to be unsuitable for normal landfill/land application, reclamation or reuse, or to interfere with the reclamation process;

(q) Detergents, surface-active agents, or other substances which may cause excessive foaming in the POTW;

(r) Any material into a manhole through its top unless specifically authorized by the Control Authority.

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.

(C) CATEGORICAL PRETREATMENT STANDARDS. The categorical pretreatment standards found at 40 C.F.R. Chapter I, Subchapter N, Parts 405-471 are hereby incorporated.

(1) Where a categorical pretreatment standard is expressed only in terms of either the mass or the concentration of a pollutant in wastewater, the Control Authority may impose equivalent concentration or mass limits in accordance with 40 C.F.R. 403.6(c).

(2) When wastewater subject to a categorical pretreatment standard is mixed with wastewater not regulated by the same standard, the Control Authority shall impose an alternate limit using the combined wastestream formula in 40 C.F.R. 403.6(e).

(3) A user may obtain a variance from a categorical pretreatment standard if the user can prove, pursuant to the procedural and substantive provisions in 40 C.F.R. 403.13, that factors relating to its discharge are fundamentally different from the factors considered by EPA when developing the categorical pretreatment standard.

(4) A user may obtain a net gross adjustment to a categorical standard in accordance with 40 C.F.R. 403.15.

(D) LOCAL LIMITS. The following pollutant limits are established to protect against pass through and interference. No person shall discharge wastewater containing in excess of the following instantaneous maximum allowable discharge limits except by permit from the Control Authority:

0.68 mg/l arsenic

0.02 mg/l cadmium
0.48 mg/l chromium
0.23 mg/l copper
0.01 mg/l cyanide
0.15 mg/l lead
0.0002 mg/l mercury
0.20 mg/l nickel
1.23 mg/l silver
1.52 mg/l zinc

The above limits apply at the point where the wastewater is discharged to the POTW. All concentrations for metallic substances are for "total" metal unless indicated otherwise. The Control Authority may impose mass limitations in addition to, or in place of, the concentration-based limitations above.

The City may revise or modify the local limits as required, or if deemed necessary to comply with the objectives presented in §51.070 of this Subchapter or the general and specific prohibitions in §51.075(B) of this Subchapter, or to insure compliance with Federal, State, or local law.

(E) RIGHT OF REVISION. The City reserves the right to establish, by ordinance or in wastewater discharge permits, more stringent standards or requirements on discharges to the POTW.

(F) DILUTION. No user shall ever increase the use of process water, or in any way attempt to dilute a discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a discharge limitation unless expressly authorized by an applicable pretreatment standard or requirement. The Control Authority may impose mass limitations on users which are using dilution to meet applicable pretreatment standards or requirements, or in other cases when the imposition of mass limitations is appropriate.

§51.076. PRETREATMENT OF WASTEWATER.

(A) PRETREATMENT FACILITIES. Users shall provide wastewater treatment as necessary to comply with this Subchapter and shall achieve compliance with all pretreatment standards, local limits, and the prohibitions set out in §51.075(B) of this Subchapter within the time limitations specified by EPA, the State, or the Control Authority, whichever is more stringent. Any facilities necessary for compliance shall be provided, operated, and maintained at the user's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the Control Authority for review, and shall be acceptable by the Control Authority before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the user from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the Control Authority under the provisions of this Subchapter.