

ADEQ

ARKANSAS
Department of Environmental Quality

January 31, 2007

David Jurgens, P.E.
Water and Wastewater Director
City of Fayetteville
113 W. Mountain Ave.
Fayetteville, Arkansas 72701

*pcs logged
AB*

Re: City of Fayetteville (NPDES #AR0020010) Pretreatment Program
Audit/Municipal Pollution Prevention Assessment

Dear Mr. Jurgens:

Please find enclosed the finished report for the audit/assessment conducted November 14 through 16, 2006. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the recommendations (special attention is drawn to the first recommendation to implement a formal grease trap program). Please respond in writing within thirty (30) days to the audit findings with proposed actions.

The City appears to have a staff genuinely interested in the Program and its implementation. This auditor was pleased with the personnel's knowledge and the status/evolution of the City's Program. The integration of your Pollution Prevention (P2) Program and partnerships with local environmental stakeholders into the Pretreatment Program seems to have made great headway.

It was a pleasure working with your staff during the audit and becoming more familiar with the City of Fayetteville, its industries, the Pretreatment and P2 Programs.

Feel free to contact this office with any questions.

Sincerely,



Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist & Attachments

cc: Lee Bohme/EPA/1445 Ross Avenue/St.1200/6WQPP/Dallas, TX 75202-2733
Frank Esry/NPDES Inspector Supervisor
Dennis Benson/NPDES Enforcement Branch Manager

NPDES PERMIT FILE	
NPDES #	<u>AR0020010</u>
AFIN #	<u>7200102</u>
	Permit PN
	Correspondence
	Technical Backup
<u>2/1/07</u>	Date Scanned
<input checked="" type="checkbox"/>	Report

**PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT
CITY OF FAYETTEVILLE, ARKANSAS
NPDES PERMIT #AR0020010**

January 31, 2007

Prepared by: Allen Gilliam

NPDES State Pretreatment Coordinator

Arkansas Department of Environmental Quality

TABLE OF CONTENTS

A) Introduction

B) Summary of Findings with Required Actions

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

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

LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation

A) INTRODUCTION

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

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

An audit/assessment was performed November 14th through the 16th, 2006, of the Pretreatment Program implemented by the City of Fayetteville, Arkansas. Participants included:

Allen Gilliam ADEQ / State Pretreatment Coordinator

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

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

The original Program was originally approved 4/26/84. Subsequent program modifications were submitted, approved and incorporated into their NPDES permit on 7/14/98. The modifications included legal authority and program narrative revisions, an Enforcement Response Plan and the development of Technically Based Local Limits. The Program will once again have to be modified to be current with the revised ("Streamlined") provisions of 40 CFR 403 (10/05).

The City's wastewater treatment plant is a biological nutrient removal/activated sludge system which includes primary clarification, aeration basins with RAS and anaerobic zones, secondary clarification, sand filtration and disinfection by ultraviolet light prior to discharge either into an unnamed tributary of Mud Creek or the West Fork of the White River.

There has been no pattern of aquatic toxicity observed in the POTW's effluent although in mid '04, there were isolated tests showing lethality and sublethality to both species. Subsequent retests passed.

The POTW has a design flow of 12.6 MGD and an average flow of 12.4 MGD. Approximately 13% of that is from 9 significant industrial contributors, 5 of which are categorical. Approximately 3000 dry tons of sludge per year is disposed to a landfill.

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. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the City's approved program will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1) Under 40 CFR 403.8(f)(1)(iii) "The POTW shall...control through permit...the contribution to the POTW by each IU to ensure compliance with applicable Pretreatment Standards and Requirements".

Custom Powder Coatings has a phosphatizing operation which falls under the core operations of the metal finishing pretreatment standards in 40 CFR 433. This facility must be permitted as a new source.

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

*1) It's **strongly** recommended the City develop and implement a formal grease trap program. Numerous cities across the U.S. have shown immense savings as well as fewer sanitary sewer overflows implementing a successful program. Model ordinance language and various grease trap forms (manifests, pump schedule logs, etc.) are available from this office upon request.*

2) Recommend sending a copy of the reporting requirements located in **40 CFR 403.12(p)** to the hazardous waste generators shown on ADEQ's list supplied to pretreatment personnel during the audit.

This notification should also be sent to the City's dentist offices/clinics, hospitals, photo shops, screenprinters, chiropractors, long term health clinics, pharmacies, veterinarians and machine shops. The last notification found and documented was dated '98. It's more than likely the City's hazardous waste family has changed somewhat since then and the groups mentioned in this paragraph may not even realize they're potential generators.

3) Recommend re-evaluating maximum allowable headworks loadings (and max. allowable industrial loadings, MAHLs & MAILs) based on current information. An additional forward thinking recommendation would be to take into account how the new West Side POTW will affect the current Noland POTW MAHLs.

4) Recommend re-visiting the interjurisdictional agreements with Greenland, Farmington and Elkins to verify "sunset" dates have not passed.

5) Recommend including pollution prevention (P2) questions in future industry/business surveys as well as in current SIU permit applications.

6) Since there are already P2 assessments required in existing permits, it's recommended those annual "assessment" reports include measurements of success. Water/energy savings, pounds of toxic pollutants reduced from the year before, money saved by implementing best management practices are a few "yardsticks" to consider asking for.

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.

8) Recommend issuing some form of control mechanism to the owners of the septage haulers currently discharging to the POTW. This document must include the discharge point at the POTW per **40 CFR 403.5(b)(8)** and should include the specific prohibitions in **40 CFR 403.5(a)(1) & (b)** and applicable semi-annual certification statements.

It's realized the city does have some form of control via "a plant operator taking grab samples" but, a written discharge permitting document with specific provisions is advisable.

9) Recommend including P2 audits as an enforcement option in current Program's Enforcement Response Guide.

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

11) Recommend including specific pollution prevention questions on inspection forms. Does the IU practice counterflow rinsing? Air knives? In-process recycling? Or other P2 options from EPA's Development Document (chapters 8 & 9) located at <http://www.epa.gov/waterscience/guide/mpm/rule.html> ?

Also recommend chemical handling (especially hazardous waste) procedures be discussed in more detail during the inspections.

**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**

Modify the City's Pretreatment Program (which will include the Ordinance) to be current with, at a minimum, the required Streamlining revisions in **40 CFR 403**.

* * * * *

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

PRETREATMENT AUDIT CHECKLIST

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I:	General Information	Pages 1- 4
Section II:	Pretreatment Program Analysis	Pages 5-21
Section III:	Industrial User File Evaluation	Pages 22-32

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 Title: Water & Wastewater Director
 Telephone: 479.575.8330 FAX NUMBER: 479.575.8257

Pretreatment Contact: Denise Georgiou Title: Ind. Pretreat. Coord.
 Address: OMI, 1400 N. Fox Hunter Road, 72701
 Telephone: 479.443.3292
 E-mail: dgeorgiou@arkansasusa.com

Pretreatment program approval date: 4/26/84

Dates of approval of any substantial modifications: 7/14/98

Month Annual Pretreatment Report Due: May

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 11/14 - 16/06
 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>*Denise Georgiou</u>	<u>Industrial Pret. Coord.</u>	<u>479.443.3292</u>
<u>Duyen Tran</u>	<u>Project Manager</u>	<u>"</u>

* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>11/04</u>	<u>None apparent</u>
<u>PCI</u>	<u>11/03</u>	<u>None apparent</u>
<u>PCI</u>	<u>5/03</u>	<u>None apparent</u>

YES NO

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

If yes, describe the required corrective action: _____

 ✓ Is the Control Authority currently in SNC or RNC?

.....

The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with an 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	6/1/06	5/31/11
AR0050288	West Side WWTP (under constr.)	12/1/05	11/30/10

* 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- 12.6 MGD; Actual (Average)- 12.4 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): 1.66 Industrial Flow (%) : 13.4 %

Level of Treatment

Type of Process(es):

Primary bar screen; primary clarifiers;
 Secondary aeration basins w/RAS and anaerobic & oxic chambers;
 Tertiary secondary clarification; alum precip. & sand filtration & post aeration
 Method of Disinfection: Ultraviolet
 Dechlorination YES NO

Effluent Discharge

Receiving Streams Names: W. Fork of White & unnamed trib. to Mud Creek

Receiving Streams Classification: 4K of White River & 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:

<input type="checkbox"/> Land Application	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Monofill	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Mun. Solid Waste Landfill	<u>3,000</u> dry metric tons/yr.
<input type="checkbox"/> Public Distribution	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Lagoon Storage	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Other (specify)	<input type="checkbox"/> dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals, NH3-N & T.Phos

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: 9/20/03
 Expiration Date: 9/19/08

List pollutants that are specified in current sludge permit:
40 CFR 503 referenced

YES NO N/A Has the Control Authority submitted results of whole effluent biological toxicity testing.

YES NO N/A 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?) 7/04 - Pimephales NOEC Lethal: 35%, sublethal: 35%; Ceriodaphnia NOEC Lethal: 100%, sublethal 94%. Passed both retests. 4/04 - Pimephales NOEC: sub-lethal: 70%. Passed retests. (Lindane and heptachlor were found present) during preliminary tests)

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>12</u>	<u>12</u>	<u>4</u>	<u> </u>
Priority **	<u>1</u>	<u>1</u>	<u> </u>	<u> </u>
Biomonitoring	<u> </u>	<u>4</u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u>1</u>	<u> </u>
Other: <u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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

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

BOD5 and TSS loadings have increased due to population growth.

YES NO N/A

YES NO N/A Has the POTW begun tracking the trends in the above samples?

YES NO N/A Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?
 If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>n/a</u>	<u> </u>

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

 Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]

 Have any substantial modifications been made or requested to any pretreatment program components since the last audit?
If yes, identify below.

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

Does the Control Authority's legal authority enable it to:

[403.8(f)(1)(i-vii)]

- | <u>YES</u> | <u>NO</u> | |
|-------------------------------------|--------------------------|-------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Deny or condition pollutant discharges |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Require compliance with standards |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Control discharges through permit or similar means |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Require compliance schedules and IU reports |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Carry out inspection and monitoring activities |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Obtain remedies for noncompliance |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Comply with confidentiality requirements |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Establish Pollution Prevention |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Has the city developed and adopted a Pollution Prevention policy? |

YES NO

- Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:
- No oversight authority
 - No inspection authority
 - No remedies for noncompliance
 - No "equivalent" standard
 - No clear delineation of responsibility for program implementation
 - Interjurisdictional agreements not entered into
 - Other, Specify: _____
- 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 (P²) policies by contributing jurisdictions?

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

Problems

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

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?

<u>IU Name</u>	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</u>
<u>None</u>	_____	_____	_____

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

- YES NO Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *"Ongoing but, wrapping up the '05 one" (See Attachment A-1 for example)*
- If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P² 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 P² activity and the distribution of P² reference materials to the IUs which qualify?

SECTION II: PROGRAM ANALYSIS AND PROFILE

What methods are used to update the IWS:

- Review of newspaper/phone book
- Review of plumbing/building permits
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) _____

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: none apparent

YES NO

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

<u>Name of IU</u>	<u>Type of Industry</u>	<u>Is the IU Permitted?</u>
<u>*Custom Powder Coatings was identified as a metal finisher during this audit.</u>		
_____	_____	_____

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. 7 Other regulated nonsignificant IUs (Describe) septage haulers
- 16 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: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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?

(See Attachment A-2 & A-3f for "assessment" & example permit requirement)

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:

<u>IU NAME</u>	<u>PERMIT EXPIRATION DATE</u>
<u>n/a</u>	

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:

<u>Pollutant</u>	<u>Limit</u>
<u>N/A</u>	

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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? "Letter of Authorization"

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

<u>Pollutant</u>	<u>Limit</u>
<u>1,4 dioxane</u>	<u>Drinking water MCLs</u>
_____	_____

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?

'92 & '98 Date Notified Letter Method of Notification

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

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

<u>Pollutant</u>	<u>Old</u>	<u>New</u>	<u>Reason</u>
<u>Changed</u>	<u>Limit</u>	<u>Limit</u>	<u>for Change</u>
<u>N/A</u>	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		SUO Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
	Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.02
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.48
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.23
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.01
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.15
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.0002
Molybdenum (Mo) *	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.20
Selenium (Se) *	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.23
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.52

* - If necessary for the sludge disposal option chosen.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

 ✓ Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

POLLUTANT	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
	Yes	No	Yes	No	Yes	No	
<u> n/a </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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)	<u> </u>	<u> </u>	<u> </u>
Cadmium (Cd)	<u> </u>	<u> </u>	<u> ✓ </u>
Chromium-Total	<u> </u>	<u> </u>	<u> ✓ </u>
Copper (Cu)	<u> </u>	<u> </u>	<u> ✓ </u>
Cyanide (CN)	<u> </u>	<u> </u>	<u> </u>
Lead (Pb)	<u> </u>	<u> </u>	<u> ✓ </u>
Mercury (Hg)	<u> </u>	<u> </u>	<u> </u>
Molybdenum (Mo)	<u> </u>	<u> </u>	<u> </u>
Nickel (Ni)	<u> </u>	<u> </u>	<u> ✓ </u>
Selenium (Se)	<u> </u>	<u> </u>	<u> </u>
Silver (Ag)	<u> </u>	<u> </u>	<u> ✓ </u>
Zinc (Zn)	<u> </u>	<u> </u>	<u> ✓ </u>

City uses either 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 an allocated mass limit based on flow.

SECTION II: PROGRAM ANALYSIS AND PROFILE

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants? _____
West Side POTW still under construction and the more stringent will apply

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
Inspections:			
CIUs	<u>1</u>	1/year	_____
Other SIUs	<u>1</u>	1/year	_____
Sampling:			
CIUs	<u>1</u>	1/year	_____
Other SIUs	<u>1</u>	1/year	_____
Reporting:			
CIUs	<u>6 - 12</u>	2/year	<u>Increased compliance</u>
Other SIUs	<u>12</u>	2/year	<u>assurance</u>
Self-Monitoring:			
CIUs	<u>6 - 12</u>	2/year	"
Other SIUs	<u>12</u>	2/year	"

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

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

Does the Control Authority routinely split samples with industrial personnel: Occasionally

YES NO

 If requested?

 To verify IU self-monitoring results?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

	<u>Analytical Method *</u>	<u>Name of Laboratory</u>
Metals	<u>flame or furnace</u>	<u>in-house</u>
Cyanide	<u>335.2</u>	<u>American Interplex</u>
Organics	<u>GC/MS</u>	<u>"</u>
Other	<u>Whole Effluent Toxicity</u>	<u>Univ. of Ark. Ecotoxicology</u>

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

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

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe: they have done splits and duplicates in the past with various contract labs and use EPA's DMR blind samples

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: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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)]

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

YES NO

Describe how the Control Authority will investigate instances of noncompliance

Describe the Control Authority's types of escalating enforcement responses and the periods for each response

Identify by Title the Official(s) responsible for implementing each type of enforcement response

Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

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

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

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

Imprisonment

Termination of Service

Other: _____

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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: See Attachment A-10 for example

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

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

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

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

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

Has the Control Authority experienced any of the following:

- | <u>YES</u> | <u>NO</u> | <u>EXPLAIN and ID Industrial User</u> |
|--------------------------|-------------------------------------|---------------------------------------------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Interference [WENDB]. _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Pass through [WENDB]. _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Fire or explosions? _____
(incl. flash point viol.) |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Corrosive structural damage? _____
(incl. pH <5.0). |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Flow obstructions? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Excessive flow _____
or pollutant
concentrations? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Heat problems? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Interference due to oil _____
or grease? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Toxic fumes? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Illicit dumping of _____
hailed wastes? _____ |

- | <u>YES</u> | <u>NO</u> | |
|-------------------------------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)] |
| <input type="checkbox"/> | <input type="checkbox"/> | How many SIUs are currently on compliance schedules? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)] |

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

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	\$ _____
Administrative	<u>0</u>	\$ _____
Total	<u>0</u>	\$ _____ [WENDB-IUPN]

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

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: Completion of their new West Side POTW will have an impact on their existing WW treatment plant's MAILS

Are all records maintained for at least 3 years?

SECTION II: PROGRAM ANALYSIS AND PROFILE

K. RESOURCES

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

1.5

YES NO

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

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

n/a

Percent of Total Funding

<input checked="" type="checkbox"/> POTW general operating fund	<u>100</u>
<input type="checkbox"/> IU permit fees	_____
<input type="checkbox"/> monitoring charges	_____
<input type="checkbox"/> industry surcharges	_____
<input type="checkbox"/> 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) _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>	<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment <u>3 automated Iscos and 2 Sigmas</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment <u>standard list</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles <u>2 Vans</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment <u>conventional equip and flame and furnace AA</u>

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):

See Attachment A-11 for City's own narrative of their P2 program(s).

2. Has the source of any toxic pollutants been identified? Yes
If yes, what was found?

As indicated before, traces of lindane and heptachlor was found around the July/August '04 testing. Subsequent testing showed non-detect.

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.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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 A-2 for example)

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No

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

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Superior Industries File/ID No. FAY 09
Industry Address 1901 Borick Drive, 72701
Industry Description Plating of aluminum wheels for the auto industry 3479,3398
Industrial Category Metal finishing 40 CFR 433 SIC Code: 3471,3363
Ave. Total Flow (gpd) 390,000 Ave. Process Flow (gpd) 330,000
Industry visited during audit: YES 479-443-7870

Comments: Aluminum casting of wheels also (no wastewater generated)

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) 21,000
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 the cement finishing business (trowels, floats)
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3423
Ave. Total Flow (gpd) 8,650 Ave. Process Flow (gpd) 5050
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) 1.0 Ave. Process Flow (mgd) 1.0
Industry visited during audit: NO

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) 9,000 Ave. Process Flow (gpd) 300 (batch)
Industry visited during audit: YES

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Is the IU considered "significant" by the Control Authority?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Is the user subject to categorical pretreatment standards?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
a. New source or existing source (NS or ES)?	<u>(2)NS</u>	<u>ES</u>	<u>ES</u>	<u>N/A</u>	<u>ES</u>
b. Is this IU one identified as having P ² potential?	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

B. Control Mechanism

1. Does the file contain an application for a control mechanism?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
If yes, what is the application date?	<u>11/02</u>	<u>5/06</u>	<u>8/03</u>	<u>3/05</u>	<u>5/03</u>
Does it ask for Pollution Prevention information?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>
2. Does the file contain a Permit?	<u>3</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Permit Expiration Date?	<u>2/08</u>	<u>8/11</u>	<u>11/08</u>	<u>5/10</u>	<u>8/08</u>
Is a fact sheet included?	<u>4</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) See Attachment A-3f for example permit requirement; 2) Chrome plating ops began in '94; 3) See Attach. A-3 for example; 4) See Attach. A-4 for example

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Appropriate discharge limitations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
e. Appropriate self-monitoring requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
g. Sampling locations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Civil and Criminal Penalty provisions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Revocation of permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
l. Compliance schedules/ progress reports	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
m. General/Specific Prohibitions?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>n/a</u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
D. <u>Compliance Monitoring</u>					
<u>Sampling</u>					
1. Does the file contain Control Authority sampling results for the industry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Sample date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Sample type?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Wastewater flow at the time of sampling?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
e. Sample preservation procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Chain-of-custody records?	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) See Attach. A-6 for example

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>n/a</u>	<u>2</u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>Batch</u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
<u>Inspections</u>					
7. Does the IU file contain inspection reports?	<u>3</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Date of last Inspection	<u>12/05</u>	<u>12/05</u>	<u>12/05</u>	<u>11/05</u>	<u>11/05</u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) See Attach. A-5 for example; 2) Facility chose the O&G alternative to the TTO limit; 3) See Attach. A-7 for example

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
d. Verification of production rates?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Evaluation of pretreatment facilities?	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
h. (Re)-Evaluation of slug discharge control plan & need to develop [403.8(f)(2)(v)]	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>
i. Manufacturing facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
j. Chemical handling and storage procedures?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>
k. Chemical spill prevention areas?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
l. Hazardous waste storage areas and handling procedures?	<u>n/a</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>
m. Sampling procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) City has assumed all SIUs have the potential, therefore, have required "contingency plans" (See Attachs A-3t for permit requirement & A-8 for example) to be submitted; 2) Could be more in depth, especially the "handling procedures"; 3) Periodically done when IU is sampling

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
n. Laboratory procedures?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>
o. Monitoring records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
p. Evaluation of Pollution Prevention opportunities?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>
q. Control Authority inspector signature?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
<u>IU Self-Monitoring and Reporting</u>					
10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
11. Does the file include:					
a. BMR?	<u>archived</u>	<u>arch.</u>	<u>arch.</u>	<u>arch.</u>	<u>arch.</u>
b. 90-Day Report?	<u>"</u>	<u>"</u>	<u>"</u>	<u>✓</u>	<u>"</u>
c. All periodic reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
12. Did the IU report on all required parameters?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
14. Did the IU report flow?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>batch</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) They verify the IU's lab is ADEQ certified; 2) Recommend including more questions regarding P2

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>1</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>
b. Did POTW respond to the spill?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
b. IU self-monitoring results?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>

Comments: 1) See Attach. A-9 for example

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>1</u>	<u>0</u>	<u>2</u>	<u>2</u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>1*</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>
5. Were all nondischarge violations identified in the file?	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>not necessary</u>		<u>n.n.</u>	<u>n.n.</u>	<u>n.n.</u>
8. Did the Control Authority follow its approved ERP?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>✓</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>

Comments: 1) See Attachs. A-10 for example violation(s)' correspondence between IU and City (these violations were in the NEW "pretreatment reporting year" ('06) and not reported as violations above).

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>
11. Were there any compliance schedule violations?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

During evaluation for SNC, did the CA consider each of the following criteria?

a. Chronic violations	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. TRC	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Pass through/Interference	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Spill/slug loads	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
e. Reporting	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Compliance schedule	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
g. others (specify)	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
13. Was the SIU published for SNC?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
Date of publication.	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Fayetteville NPDES #: AR0020010
 Date of Audit: 11/14 - 11/16/06 Date entered into QNCR: 1/31/07
 (ASSESSMENT)

		Level
NO	Failure to enforce against pass through and/or interference	I
NO	Failure to submit required reports within 30 days	I
NO	Failure to meet compliance schedule milestone date within 90 days	I
NO	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
NO	Failure to inspect or sample 80% of SIUs within the last reporting year	II
NO	Failure to enforce pretreatment standards and reporting requirements	II
YES	Other violations of concern (Failure to permit one [1] categorical metal finisher)	II

SIGNIFICANT NONCOMPLIANCE (SNC)

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

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Fayetteville NPDES #: AR0020010

Name, address and phone number of industry:

Elkhart Products, 3265 Hwy. 71 S., 479.527.8624

Type of industry: CFR 468

Date/Time of visit:

Mfg. Cu tubing & fittings

11/15/06 / 11:15 a.m.

Industry contacts: Jerry Whiteside - Sr. Plant Engineer &
David Bailey

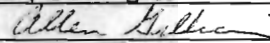
	Yes	No	N/A
1. Significant industrial user?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Classified correctly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Pretreatment equipment or procedures?	<input checked="" type="checkbox"/>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

Additional comments: Facility has not changed ops significantly since the last audit five (5) years ago. They have gone to a different cleaner from the old caustic which is much easier to treat and more "environmentally friendly" which the facility rep. described as a soap.

They still bring in raw copper cathodes/slabs (400 lbs) with end product being various pipe fittings such as Tees, elbows and tubing.

Approximately 50-60 thousand lbs/day is estimated production. This corresponds to the basis for the production-based limits in the IU's permit calculations.

Visit conducted by: Gilliam/Georgiou Date: 11/15/06


(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: Copper slabs are sent through an induction furnace where it is melted and then "up-cast" into basic tube forms through 14 dies in an impressive slow moving "fountain" of hot copper tubes which allows for air cooling. As the tubes move downward, straighteners (rollers) receive the tubes and straighten them onto work tables.

The tube is drawn anywhere from 2 to 6 times to achieve required diameters. Sizes range from ½" to 1 & ½" diameter. Lube/cooling process fluid is self contained.

Tubing is cut to length, oven annealed for desired strength properties followed by a small quench tank (consisting of water) which is continually recycled through filters.

Calcium stearate (discontinued the zinc stearate) bath is used for lubrication procedure follows with tube lengths either bent into elbows or extruded into Tees. The extrusion process utilizes "woods metal" (consisting of ~50% bismuth, 25% Pb and 25% tin). Tees are sent through a hot oil bath to remove the "woods metal" which is re-used.

Oil is removed in a hot water bath, belt skimmed and centrifuged for total oil and water recycle. Tees are alkaline cleaned and rinsed.

What little wastewater generated (~600 gpd) is pretreated by simple chem. precip. (pH controlled) w/bentonite clay flocculation, then neutralized before it's batch discharged. Sludge is further dewatered through a paper filter and is conveyed to a roll-off for disposal to the local landfill.

There's also a small room for chrome plating of some the tools they use internally. It's seldom used and its wastewater is hauled off-site.

Adequate sampling site.

Visit conducted by: Gilliam/Georgiou Date: 11/15/06



(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

Date/Time of visit:

Concrete finishing hand tools

11/15/06 / 2:10 p.m.


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

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

Additional comments: Facility hasn't substantially changed operations since the last audit five (5) years ago.

Facility's main product is cement finishing equipment: trowels, floats and taping knives. Raw material includes magnesium, cold rolled steel, plastic and aluminum.

Visit conducted by: Gilliam/Georgiou Date: 11/15/06



(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 sole core operation that captured this IU under CFR 433 is the 2 stage iron phosphatizing and subsequent rinsing of the product for preparing part of the tool surface for the hot melt glue to hold the rubber pads. These pieces are oven dried then (water-based) painted prior to assembly (includes riveting, then grinding smooth). The Al and mag. based tools are sent through an alkaline wash/rinse cycle prior to final assembly. For those products to be painted w/a solvent base, naphtha is used in hand wiping those surfaces.

Machining such as drilling and polishing uses a water based coolant. The polishing stations have a wet scrubber system for collection of dust.

They have a very small etching operation where they place their names on end products. No measurable wastewater generated from this process.

Total process flow is approximately 5,000 gpd. Pretreatment equip. is not necessary for this type wastewater to meet CFR 433.

Adequate sampling site.

Visit conducted by: Gilliam/Georgiou Date: 11/15/06



(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:

K-D (Danaher) Tool Group, 2900 City Lake Road, 479.442.7779

Type of industry: CFR 433

Date/Time of visit:

Specialty automotive hand tools 11/15/06 / 3:15 p.m.

Industry contacts: Richard Vaughan / Dwight Canfield

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

Additional comments: Facility hasn't changed basic operations since the last audit done five (5) years ago. Zinc plating and black oxidizing captures it under the CFR 433 regs.

It manufactures automotive tools mainly from medium hardness steel (1010,1080). Raw material also includes some Zn castings and Al. Products are stamped/blanked from sheet mtrl. Machining by lathe, broaching and is followed by heat treatment for desired properties.

Visit conducted by: Gilliam/Georgiou Date: 11/15/06

Allen Gilliam

(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:

After hot oil treated (recycled after spent) products are sent through either the black oxide process or Zn plated (barrel). Special note taken during site visit: Cleaning bath ops after heat treat oil was wasteful and would be considered dilution at that time. During time of visit, no product was being heat treated/quenched nor rinsed. But, (manual feed) overflow from rinse was still flowing. IU rep indicated he'd follow up on it. Pollution Prevention alternatives in use in the Zn plating operation include double and triple countercurrent flows. Black oxide process also includes countercurrent flow rinses. Schematics viewed on-site were not exactly as plant configured but showed a good representation of the tanks with the chemistry and sequence description for each. Non-contact cooling water is also used as make-up water in some rinses. They have been able to use ion exchange for reuse of Zn back to the plating bath.

Process tanks include caustic clean/rinse; muriatic acid/rinse; surfactant/rinse; muriatic acid/2 rinses; Zn chloride plate (4 tanks)/3 rinses; sealant bath/3 rinses and spin dry. Pretreatment includes batch treatment, chemical precipitation, clarification, sludge thickening, filter press, neutralized and then discharged to the city at an average flow of 21,000 gpd. Facility rep indicated some changes are in the plans for pretreatment because of excess soap suds in the clarifier.

Visit conducted by: Gilliam/Georgiou Date: 11/15/06



(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:

Superior Industries, 1901 Borick Dr., 479.443.7870

Type of industry: CFR 433

Date/Time of visit:

Mfg of Al wheels for the auto ind. 11/16/06 / 10:25 a.m.

Industry contacts: Garnett Wise - Env. Engineer

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

Additional comments: Facility has recently decommissioned its chrome plating line (with Zincate and CN) and is completing treatment of unused process chems to meet permit limits. Facility has also replaced its chrome "alodining" (conversion coating) ops with a non-chrome based product (trade name - Chemetall?) which will now be their lone core operation capturing them under CFR 433. Other process lines have not changed significantly since the audit five years ago although casting of Aluminum wheels will soon increase from 35,000/wk to over 55,000/wk. Raw material includes high grade aluminum in the form of "T bar" ingots which are melted by five (5) air flux furnaces.

Visit conducted by: Gilliam/Georgiou Date: 11/16/06

Allen Gilliam

(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: Low pressure casting (70 units total with only about 40 in operation right now) follows with rough product being air and then water cooled (for handling purposes) in an outside trough (~10,000 gal which is continually recycled and might be drained 1 to 2/yr). That wastewater is all that's associated with the casting operations. No hydraulic or mold cooling leakage observed around or under die casting "deck". Cooled castings are heat treated in an oven after which they're quenched (%100 recycle w/very infrequent discharge) prior to further machining. Robotics are mostly used for cutting, lathing, drilling, etc and has replaced most hand polishing. There are approximately 128 self-contained machining cells each of which perform as many as 36 different operations. 85,000 gallons of this fluid is continually recycled/filtered/low & high speed centrifuged for to help remove "tramp oil" and chips. UV is also used to disinfect fluids to help extend life. Helium leak testing waters are continually recycled also. An acrylic powder "clear coat" is applied to painted/polished product to preserve finish.

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: Gilliam/Georgiou Date: 11/16/06



(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:

11/16/06 / 12:30 p.m.

Industry contacts: Angela Stephans

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

Additional comments:

A site visit was conducted at this facility to verify its status as a categorical or not and whether it needed to be permitted as an SIU.

Visit conducted by: Gilliam/Georgiou Date: 11/16/06

Allen Gilliam

(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:

Facility does have a standard 3 stage Fe phosphatizing operation with an alkaline cleaning bath, fresh water rinse and a final Fe phosphatizing stage prior to drying off, then to the the powder coat booth.

Facility would be considered a "job shop" (CFR 413 no longer applicable) since it owns none of the material it processes. Nature of operations (with the phosphoric acid) which is conditioning a substrate prior to a subsequent operation (painting) falls under the core operation of "coating" in CFR 433 and will have to be permitted accordingly as a new source since it began operating around '99.

Facility rep had no knowledge of the Pretreatment regulations. A potential sampling point identified during the visit was the continual overflow pipe which discharged into a floor drain. Representative sampling will have to be determined.

Pretreatment, other than maybe a simple O&G removal system, may not be necessary for this type wastewater.

And, a TOMP or will probably "fit" this facility as there were no excess chemicals (toxic organics) observed during the brief walk through.

Visit conducted by: Gilliam/Georgiou Date: 11/16/06

Allen Gilliam

(signature of auditor conducting visit)



NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/> 3	AR0020010	11 12 06/11/14	18 <input type="checkbox"/> 6 <input type="checkbox"/>	19 <input type="checkbox"/> 5 <input type="checkbox"/>	20 <input type="checkbox"/> 1 <input type="checkbox"/>
Remarks Pretreatment Program Audit					
Reserved	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="checkbox"/> <input type="checkbox"/> 69 <input type="checkbox"/>	70 <input type="checkbox"/>	71 <input type="checkbox"/>	72 <input type="checkbox"/>	73 <input type="checkbox"/> 74 <input type="checkbox"/>	75 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 80 <input type="checkbox"/>

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/> 3	AR0020010	11 12 06/11/15	18 <input type="checkbox"/> 4 <input type="checkbox"/>	19 <input type="checkbox"/> 5 <input type="checkbox"/>	20 <input type="checkbox"/> 2 <input type="checkbox"/>
Remarks 04 SIA Site Visits Conducted					
Reserved	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="checkbox"/> <input type="checkbox"/> 69 <input type="checkbox"/>	70 <input type="checkbox"/>	71 <input type="checkbox"/>	72 <input type="checkbox"/>	73 <input type="checkbox"/> 74 <input type="checkbox"/>	75 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 80 <input type="checkbox"/>

Section B: Facility Data

Name and Location of Facility Inspected City of Fayetteville Pretreat Program 1400 N. Fox Hunter Rd. Fayetteville, AR 72701	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 11/14/06 7:30	Permit Effective Date 4/1/06
	Exit Time/Date 11/16/06 3:00 pm	Permit Expiration Date 5/31/14

CODE SHEET

Pretreatment Audit

Auditor's Name	<u>Gillian</u>	CODE
Permit Number	<u>AR0020010</u>	
Audit Date	<u>11/14-16/06</u>	DTIA
Date Permit Modified to require pretreatment	<u>4/26/84</u>	PTIM

PPETS WENDR DATA ELEMENTS

Significant IUs without Control Mechanisms	<u>0</u>	NOCM
Number of Significant IUs	<u>9</u>	SIUS
Number of Categorical IUs	<u>5</u>	CIUS
Technical Evaluation for Local Limits	<u>Y</u>	EVLL
Adoption of Technically-Based Local Limits	<u>Y</u>	ADLL
Significant IUs not inspected or sampled	<u>0</u>	NOIN*
Significant IUs in significant noncompliance with standards or reporting	<u>0</u>	PSNC*
Significant IUs in significant noncompliance with self-monitoring	<u>0</u>	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	<u>0</u>	SNIN*

Attachment A-1



WATER AND WASTEWATER DEPARTMENT

July 31, 2006

Dear Wastewater Customer:

Arkansas Department of Environmental Quality and Federal Regulations require the City of Fayetteville to conduct a Wastewater Survey every three years of the users within our service areas. The reason for this survey is to determine if your wastewater could have significant impact on the wastewater collection and treatment system and its processes, as well as to confirm compliance with the Industrial Pretreatment Program and the *Discharge and Pretreatment Regulations* in the Fayetteville Code.

Please fill out the attached questionnaire as accurately and completely as possible, and return the questionnaire by August 16, 2006 to the following address:

OMI, Inc.
ATTN: Industrial Pretreatment Coordinator
1400 N. Fox Hunter Road
Fayetteville, AR 72701

If you have any questions, please contact the Industrial Pretreatment Coordinator at the Fayetteville Wastewater Treatment Facility at 443-3292.

Thank you for your cooperation.

**City of Fayetteville
Wastewater Survey Questionnaire - Short Form**

For Office Use Only
Reference No. «No»

1. Company Name:

Mailing Address:

Telephone:

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

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

3. Contact Person:

Title: _____ Telephone:

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

5. List major products manufactured or services supplied:

6. Describe processes or practices involved in manufacturing products and/or applied services:

7. Number of employees:

- 8. Normal operating schedule: hours/day _____ days/week
- 9. Average monthly water usage in gallons
- 10. Is the building presently hooked to the sewer system? Y/N
- 11. Are there floor drains present at your facility? Y/N
- 12. Do you or will you use non-petroleum fats, oils or greases? Y/N
- 13. Do you or will you use petroleum oils or greases? Y/N
- 14. Grease trap present? Y/N
- 15. Do you or will you store or use chemicals on site in excess of household quantities? Y/N
- 16. Do you or will you discharge wastewater (other than domestic wastes from toilets, showers, etc.) to the sewer system? Y/N
- 17. Do you have an accidental spill prevention plan for your business? Y/N

I certify that the information in this questionnaire is to the best of my knowledge true and complete.
(This statement must be signed by an official authorized to sign for the company)

Name/Title:

Signature : _____

Date:

.....

Submit the completed questionnaire to:

OMI, Inc.
ATTN: Industrial Pretreatment Coordinator
1500 N. Fox Hunter Road
Fayetteville, AR 72701

.....

A-1c



WATER AND WASTEWATER DEPARTMENT

September 29, 2006

2nd Notice - No response to the Industrial Waste Survey Questionnaire is on file for your business. Even if you feel you should not be included in the survey, please fill out the attached questionnaire and return it to the address indicated on the back of the questionnaire. We must have a signed copy of the survey questionnaire on file.

Your prompt response will help save us the time and effort of conducting facility inspections to collect basic survey information.

Original notice you received in August:

Dear Wastewater Customer:

Arkansas Department of Environmental Quality and Federal Regulations require the City of Fayetteville to conduct a Wastewater Survey every three years of the users within our service areas. The reason for this survey is to determine if your wastewater could have significant impact on the wastewater collection and treatment system and its processes, as well as to confirm compliance with the Industrial Pretreatment Program and the *Discharge and Pretreatment Regulations* in the Fayetteville Code.

Please fill out the attached questionnaire as accurately and completely as possible, and return the questionnaire by August 16, 2006 to the following address:

OMI, Inc.
ATTN: Industrial Pretreatment Coordinator
1400 N. Fox Hunter Road
Fayetteville, AR 72701

If you have any questions, please contact the Industrial Pretreatment Coordinator at the Fayetteville Wastewater Treatment Facility at 443-3292.

Thank you for your cooperation.

A-1d.

)

)

)

Attachment A-2

FILE COPY



SUPERIOR INDUSTRIES INTERNATIONAL, INC.

1901 BORICK DRIVE • FAYETTEVILLE, AR 72701
(479) 443-7870 • FAX (479) 443-4522

By Certified Mail: 7000 1670 0010 1961 6465, Return Receipt Requested

October 29, 2004

Denise Georgiou
Industrial Pretreatment Coordinator
Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

Re: Discharge Permit No. FAY09, Superior Industries International, Inc.
Reevaluation of Pollution Prevention Assessment

Dear Denise,

Superior's ISO 14001-certified Environmental Management System (EMS) incorporates its permit-required pollution prevention assessment into ongoing plant procedures. Each critical operation and process at Superior has a documented work instruction that explains specific duties and responsibilities, including the identification of potential environmental impacts and aspects, which include wastewater discharges and other pollution prevention opportunities. I have included a copy of EMS procedure FENV-1004 for your review.

Our Environmental Management committee, made up of technical and management members, meets bi-monthly to evaluate and review "Objectives and Targets" which you'll see includes various pollution prevention opportunities among other projects (see attached EC-003 matrix, showing ongoing and historic projects).

Early each year, the EMS Committee also re-evaluates our "Aspects and Impacts" (see copy of EC-004 table), which was most recently updated 4/6/04.

Also, in accordance with our goal of continuous improvement, we recently modified our Material Safety Data Sheet submittal process to require the approval of a Wastewater representative in addition to Environmental and Safety, to help screen for chemicals of concern to our treatment plant and resulting discharge. The form also includes a preferred hierarchy that is used to screen MSDSs (see copy of EC-005 form).

I hope this serves to document our re-evaluation of pollution prevention assessment. If you need any additional information or have any questions, please contact me at 443-7870 x6331 or gwise@supind.com.

Sincerely,

Superior Industries International, Inc.

Garnett Wise
Environmental Manager

Attachments

Rec'd Deliver Postmark

29-OCT-04 Data Entry

NOV 16 - OCT - 04

Verbal Nov of

Sent EPA guidance manuals + copy of permit.

FILE COPY

	SUPERIOR INDUSTRIES INTERNATIONAL, INC. FAYETTEVILLE FACILITY	PLANT PROCEDURE NO.: FENV-1004 Rev: A Date: 11/22/02 Page 1 of 3
	TITLE: EMS PROCEDURE: ENVIRONMENTAL ASPECT IDENTIFICATION	

THE SIGNED-OFF/RELEASED DOCUMENT IS ON FILE. UNLESS OTHERWISE NOTED PRINTED COPY IS INFORMATION ONLY.

Manufacturing Plant Head : Leon Easton		Date	Manufacturing Plant Quality Systems Approval: Larry Dawson		Date
Chrome Plant Head APPROVAL		Chrome Plant Quality Systems APPROVAL		OTHER APPROVAL	
INITIALS:	DATE:	INITIAL	DATE	INITIAL	DATE
N/A		N/A			c.R.
CURRENT REV:	DATE:	SUPERSEDES REV:	DATED:	CHANGE DESCRIPTION:	
0	04/28/00			Initial release.	
A	11/22/02	0	4/28/02	Revision of EC-004 per ECR-2157.	

1.0 **PURPOSE:**

To identify the environmental aspects of Superior-Fayetteville's activities, products and services in order to determine those which may have a significant impact on the environment. This process will be an ongoing task to determine past, present and potential impacts (positive or negative) that our activities have on the environment.

2.0 **SCOPE:**

This procedure covers all activities, services and products of Superior-Fayetteville. For purposes of evaluation, activities, services and products with similar characteristics may be grouped.

A baseline evaluation will be conducted of existing products, activities and services. The need for follow-up evaluations is determined based on changes in evaluation methodology or significant changes in Superior's mission, products or processes.

3.0 **DEFINITIONS:**

Environmental aspects: Components of the organization's activities, products and services that are likely to interact with the environment.

Environmental committee: Cross-functional team to identify environmental aspects and impacts and facilitate the continuous improvement of the Environmental Management System.

Environmental impact: Any change to the environment, whether adverse or beneficial, wholly or partially resulting from the activities, products and services of the organization.

4.0 **GENERAL:**

This procedure covers those environmental aspects of activities, products and services that Superior-Fayetteville can control or over which it can be expected to have an influence. Significant environmental aspects identified through this process are considered in the setting of environmental objectives and targets.



TITLE: EMS PROCEDURE: ENVIRONMENTAL ASPECT IDENTIFICATION

The procedure consists of an initial screening of activities, products and services, based on available data from the Environmental Management Representatives. This team assesses the environmental aspects, determines which of these might result in significant impacts, then sets priorities for further analysis, as needed.

The Company reviews the information developed during the evaluation on a regular basis to ensure that it is up-to-date.

5.0 PROCEDURE:

A. The Environmental Engineer assembles a cross-functional team (Environmental Committee) to perform the evaluation. The team may include representatives from environmental, health and safety, product design, engineering, line management, maintenance and shipping / receiving or other functions as appropriate. Separate teams may be formed to evaluate particular groups of products, activities and services. The team may call upon other individuals in the organization, as needed.

B. The team considers each of the stages in the life cycle of the organization's products, services and activities, including (where appropriate):

- pre-production or service strategy (design, procurement, etc.)
- manufacturing
- production / distribution
- use / service and
- disposal / waste management

Each product, service or activity is evaluated for environmental impacts in each of these areas; however, products, services or activities may be "grouped" such that those with similar characteristics can be evaluated concurrently. The team rates the product, service or activity (or groups of same) against the factors shown on Aspects and Impacts Identification Table (EC-004) to identify those that may result in significant impacts.

C. For purposes of this evaluation, "activities" are those activities that are not directly linked to a specific product, service or activity (such as equipment maintenance). Activities that are directly linked to the manufacture of a particular product are evaluated when that product is evaluated.

D. Results of team findings are documented. If the team determines that additional information is needed to evaluate a particular product or activity, the Team Leader assigns the responsibility for collecting that information to an appropriate team member.

E. The Environmental Engineer is responsible for working with plant management to ensure that significant environmental aspects identified by the team are considered in setting environmental objectives and targets for the site. (See Procedure #FENV-1006.)

F. The results of the most recent environmental aspect / impact identification are reviewed as part of the Management Review process. Based on this review, the organization's management determines the need to update the environmental impact evaluation. Factors such as improved



**SUPERIOR INDUSTRIES
INTERNATIONAL, INC.
FAYETTEVILLE FACILITY**

PLANT PROCEDURE

NO.: FENV-1004

Rev: A Date: 11/22/02 Page 3 of 3

TITLE: EMS PROCEDURE: ENVIRONMENTAL ASPECT IDENTIFICATION

assessment methodologies or major changes to the organization's mission, products, and processes are considered in determining the need to update the assessment.

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

Champion: Garnett Wise/Lynn Pate
Responsible Management Representative: PS Reddy
Current Objective: Reduce Non-Hazardous Solid Waste by 2%

CC: PS Reddy
 Bob Bracy
 Buddy Hawkins
 Updated: 8/6/04
 Meeting: 8/6/04

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	Estimated COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
6	Ear Plugs	Carolyn O'Donnell	6/20/03	Order plugs and pass the out	Open	Ongoing	Reduce waste and cost	Will give cost saving end of Dec.
12	Reduce Water Usage	Dennis Cooper/ David Saul	09/11/02	Find and fix leaks in hoses & fittings	Ongoing	Will never be a completion date	Make copy of work orders for inspection	Reduce water usage
33	Clean up Plant Grounds and parking lots	PS Reddy, Butch Scruggs and John Newnan	11/26/02	Remove unused equipment and debris from plant grounds.	Ongoing For plant ground/parking lots	Ongoing	Cleaned Quarterly	Improve overall appearance.
51	Recycle plastic bottles and soft drink cans	Larry Goodall	3/31/04	Employees write their badge # on bottom of can/plastic bottle. Drawing for Casting and Cr Plant each month for \$25 cash/gift	Open	Ongoing	Need more containers to collect bottles/can	Donations will go to Care & Share. Also, to reduce landfill space.
53	PreMelt Filters	Bill Koch/ Dennis Cooper	4/5/04	Coolant PreMelt filters need to be pressed to remove excess coolant/oil. Filters don't drain well in hopper.	Open	Dec 04	Real problem with excess coolant leaking from dumpsters. Continual cleanup from going into ditch.	Liability/ environmental compliance.

A-2 e

OBJECTIVES AND TARGETS MATRIX EC-003

SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 CC: Bob Bracy
 Buddy Hawkins
 Updated: 8/6/04
 Meeting: 8/6/04

Champion: Milan Roy/ Garnett Wise/Lynn Pate
Responsible Management Representative: PS Reddy
Current Objective: Reduce Hazardous Waste by 10%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	ESTIMATED COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
40	Reclaim Primer during Shutdown	Milan Roy	5/16/03	Try recycle the primer instead of discarding it	Open	December 2004	Milan will report finding next meeting	Save on cost and this much more waste not going into landfill
45	Recycle Cotton Liners	Carolyn O'Donnell	6/20/03	Check on cleaning/washing on Casting Plant	On Hold	December 2004	Pending Tool crib expansion	\$?
46	Implement Metals recovery Program	Steve White Lynn Pate	6/19/03	Review Ecotect proposal for metals recovery	Open	December 2004	1 st V & E Project for the Chrome Plant	Recover nickel sulfate/chloride for use.
50	Reduce F006 <i>(wastewater sludge)</i>	Steve White	3/31/04	Run one Lamella faster Reduce Ferrous Sulfate Usage. Eliminate Calcium Chloride usage	Open	Dec 04	400 ton reduction by end of 2004	\$35,000 saving on F006 disposal

A-24

ENVIRONMENTAL MANAGEMENT SYSTEMS
OBJECTIVES AND TARGETS MATRIX EC-003
 SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins

Champion: Garnett Wise/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Air Emissions by 5%

CC:

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	Estimated COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
34	Reduce Non-HAPS Emissions	Allen Sloan	09/11/02	Low NOx Burners	Open	Ongoing	Burner Inventory completed 12-30-02. Purchase burners to replace as needed.	Reduced Emissions

A-29

ENVIRONMENTAL MANAGEMENT SYSTEMS
 OBJECTIVES AND TARGETS MATRIX EC-003
 SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins

Champion: Milan Roy/Garnett Wise/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Chromate Usage to 0%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	Estimated COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
10	Chromate Usage	Milan Roy John Beasley L.D. Lewis	09/11/02	Tests and Performance trials on Non-chromate conversion coatings completed	Ongoing testing	Will be implemented in 2005	Meeting to be determined	Appeals to European Market by customer request. Reduce the use of chrome

Azh

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 CC: Bob Bracy
 Buddy Hawkins

Champion: Garnett Wise/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Utilities by 4%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	Estimated COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
37	Reduce Electricity Usage	Bob Bracy	09/11/02	Need to install more capacitors for line loss in Casting Plant at Air Compressors	Ongoing	December 2004	Meters in place?	1 bank installed yielded 230,000 KWH \$9,000 annual savings. Saved 125 Amps
47	Reduce Water Usage	John Beasley	09/11/02	Investigate lowering Rinse water consumption Audit Line operations for usage	Closed		No Action Taken or reported	Reduce water usage by turning off when in non-production hrs. Add dual power washer, add pressure compensation control valve
52	Monitor water usage	Steve White	3/31/04	Monitor new meters	Open	Ongoing	Track water usage to determine how much usage. Install meters on Plating Line & BP area	Compare usage to determine how to cut cost

ENVIRONMENTAL MANAGEMENT SYSTEMS

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins
 Meeting 4/6/04
 Updated 4/5/04

Champion: Chris Roddam/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Hazardous Waste by 10%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
1	Reduce F006 by 3%	Steve White	09/11/02	Improve WWT Processes Review new treatment chemistry	SCRUB Project 5/16/03	Testing to be completed March 2003	Southern Water-study waste streams to reduce sludge. Cr reduction test	\$10000 (Project Dead)
2	Profile Hazardous & Non-Hazardous Waste Streams	Chris Roddam Lynn Pate	09/11/02	Catalog and review Hazardous Waste Streams	Closed 10/28/02		Haz & Non-Haz waste is current with what we send out with vendors.	COMPLIANCE
3	Implement Metals recovery program	Steve White Lynn Pate	09/11/02	Management has requested other options. Rinse water testing in progress.	Closed Project Dead 3/03		Hydromatix System CAR submitted. Waste Destruct System; samples sent out 2/10/03	1 st stage \$100,000 (Project Dead)
4	Reduce other Hazardous Waste	Steve White	Feb/02	Eliminate Sodium Hydro Sulfite.	Closed 2/02		3.4lbs hydrosulfite for 1lbs Chrome generates 6lbs sludge	\$30000

GRAY AREAS ARE CLOSED ISSUES

A-2;

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins

CC:

Champion: Chris Roddam/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Air Emissions by 5%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
7	Reduce HAPS Emissions Casting	Milan Roy	09/11/02	Review Flux Usage Review Non-HAPS Flux for Usage	Closed 5/16/03		Better documentation of flux usage by lbs used. Allocate out to furnace with a program to track accurate usage. Use smokeless flux.	Control compliance with air permit by reduced emissions and total annual max used
8	Reduce HAPS/VOC's Emissions Painting	John Beasley Milan Roy	09/11/02	Test & Switch to Low/No HAPS/VOC Paints	Closed 12-18-02		Report 100% for current paints used 11-27-02	Reduced Emission
9	Maintain Compliance with Air Permit Conditions Including MACT	Chris Roddam / Lynn pate	09/11/02	Develop system for managing changes to Permits	Closed 3/28/03		Contact Bill Kelley on this and get it straightened out as how to design a form.	COMPLIANCE
14	Air filtration projects in the Polish Dept)	Roy Pearson	1-16-03	Other air filtration projects	Closed 6/19/03	Ongoing	Air samples collected and sent to State. May install more Dust Collectors	Improve air quality in polishing area (VPP & OSHA requirements)

GRAY AREAS ARE CLOSED ISSUES

A-2K

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 CC: Bob Bracy
 Buddy Hawkins

Champion: Chris Roddam/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Air Emissions by 5%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
24	Addition of air doors	Roy Pearson	1-16-03	Install air doors on Rotary Room	Closed		Air Doors are installed Sand dollars are complete	Improve air quality in polishing area (VPP & OSHA requirements)

GRAY AREAS ARE CLOSED ISSUES

A-22

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins

CC:

Champion: Milan Roy/Chris Roddam/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Chromate usage and waste to 0%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
11	Chrome waste water treatment	Jesse Williams	09/11/02	Improve DI performance (Refurbish) (Improve operation)	Closed 3/03		No significant Change	Better control of Waste treatment process

GRAY AREAS ARE CLOSED ISSUES

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 CC: Bob Bracy
 Buddy Hawkins

Champion: Jeff Milford Chris Roddam/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Utility usage by 4%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
13	Reduce Water Usage	Jeff Milford	09/25/02	Heat Quench Water Recovery system	Complete Sept 03		Equipment is constructed in Fay. Plant	Reduce water usage by 16,000,000 gallons per yr savings est. at \$45617
15	Reduction in Wood Pallet use	PS Reddy	1-2002	Using superior purchased plastic returnable not used for the customer to cut down on pallet use.	Closed 1/2002		Pallets purchased in 2001 = 6200 Pallets purchased in 2002 = 850 Reduction of 5350 86% reduction	Reduction in landfill Annual cost savings of \$64,200.
17	Reduce Electricity Usage	Jeff Milford	09/25/02	U of A Lighting Study. Study done in Pac and Fluoroscope area	Closed 3/3/03	Have Report	Case study has been completed	Redistribute lighting based on actual need
18	Reduce water usage	Steve White	Jan/02	Conductivity controllers installed on the Zincate rinses	Closed Jan/02		Reduce Zincate rinses dumps from daily to weekly	\$40000 savings per year. Saved 2.2 million gallons/yr on water
20	Reduce Natural Gas Usage	Jeff Milford	09/25/02	CAR for Gas Meters (Monitoring) CAR approved Dec 02 They have been bought and ordered	Closed 2003		Melt & Heat Treat Furnace. 15 meters purchased for ALL Plants. Will be allocated out to each plant as upgrade	Point of usage monitoring of Natural Gas. Compliance and can tweak system to save gas

GRAY AREAS ARE CLOSED ISSUES

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins

Champion: Jeff Milford Chris Roddam/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Utility usage by 4%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
21	Reduce Natural Gas Usage	Jeff Milford	9/11/02	Install remote control doors on Melt Furnaces	Closed 2002		Remote control has been installed on #2 Melt Furnace MF 3 & 4 installation not completed	Est. annual savings of 12060 mcf or \$58129
22	Reduce Natural Gas Usage	Jeff Milford	9/11/02	Replace wet bath (MF1) with dry hearth	Closed 11/02		Installation complete, furnace is in production	Annual savings of 9615 mcf or \$46349
25	Wheel-a-brator Shot	Robbie Sikes Carolyn O' Donnell Jason Stark	09/11/02	Report on usage/lifecycle. Look for a possible recycler	Closed 12-18-02		Davis Iron & Metal Steel & SS shot in drums 40,000 lbs for load with steel shot and 10 loads for SS shot considered a load	Reduce Landfill usage by 1% SS shot \$0.01lb, C. O'Donnell fills out the recycle form
43	Gas meters in plant	Jeff Milford	5/16/03	Usage meter the gas meters on ovens and furnaces	Closed	Jul 2004	Meters Installed	Burner adj and monitor furnace efficiencies

GRAY AREAS ARE CLOSED ISSUES

A-20

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins

Champion: Jeff Milford Chris Roddam/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Utility usage by 4%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
36	Reduce Compressed Air Usage	Gary Baldridge	09/11/02	3 new Air Compressors Air Balancing System for Casting Operations and Machine Shop	Closed	July 2003	Cost Savings to be measured.	Reduce Scrap, Reduce energy cost by tweaking system and Air Compressors
54	Place compressors in standby mode	Brian Sotorske	3/31/04	Unused compressors are manually shut down during reduce load periods	Closed	July 04	When not in production, place compressors in reduced mode, leaving only one compressor in operation.	Energy cost saving

GRAY AREAS ARE CLOSED ISSUES

A-2 p

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

CC: PS Reddy
 Bob Bracy
 Buddy Hawkins

Champion: Prentice Meredith Chris Roddam/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Non-Hazardous Solid Waste

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
16	Battery Recycling (Small batteries)	Jessie Williams	12-05-02	Recycle program est. for Dry cell batteries.	Closed 12-18-02		P.O. started with Carolyn O. Bucket to go to tool cribs 12-9-02	Reduction in landfill use. Compliance
19	Cardboard recycling	Prentice M., Buddy Hawkins	9-11-02	Contacted Waste Management to get recycle containers	Closed 12-10-02		WM brought 2 - 30 yard containers for cardboard and plastic. WM to provide tons after pickup.	Reduction in landfill use
23	Recycling	Prentice Meredith Brian Tippet Clint Gill	09/11/02	Develop & Implement recycling program for Paper, Plastic, Aluminum Cans and Cardboard.	Closed 2/05/03		Care & Share (cans) WM boxes plastic 2-30yd containers for cardboard, Carolyn O check out shredded paper, go to animal shelter.	Reduce Landfill usage by 5%
26	Nickel/Copper Filter Waste	Pete Brown	09/11/02	Nikotech Unit for cleaning Bright Nickel Baths	Closed	Completed 6/03	In Operations Installed the resin beds that will remove organics	Reduce Landfill usage

GRAY AREAS ARE CLOSED ISSUES

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins

Champion: Prentice Meredith Chris Roddam/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Non-Hazardous Solid Waste

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
27	Used Oil/Coolant	Chris Roddam	09/11/02	Evaporator to reduce volume. Use totes more to use fewer drums. Use coolant totes.	Closed	Report on 6/27/03	Send samples to Poly Products. Not good results. Started using Totes, use less drums	Reduce Landfill usage \$ 10,000
28	Tires	Chris Roddam	09/11/02	Investigate current disposal Methods (Earthen Dam Filler)	Closed 11/06/02		Tires reused in earthen dam	Reduction to landfill
29	Wood Pallets	Dennis Cooper	09/11/02	Pallets Recycled and Broken Pallets turned into mulch	Closed 9/11/02		Good/broken pallet are being picked up for recycle by Hog Eye Pallet and Ace Pallet	Reduce Landfill usage
30	Totes replace 55 gallon drums where possible	Jesse Williams Lynn Pate	09/11/02	Bulk Totes Returnable Drums Non-Returnable Drums	Closed 12/18/02		Report on Monthly Recycling Report. Totes Replaced drums that could be replaced	Reduce Landfill usage by \$10000 per year

GRAY AREAS ARE CLOSED ISSUES

A-27

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

Champion: Chris Roddam/Lynn Pate
Responsible Management Representative: PS Reddy
CC: Bob Bracy
 Buddy Hawkins

Current Objective: Reduce Non-Hazardous Solid Waste

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	Remarks	SAVINGS AND/OR BENEFIT
31	Batteries	Alan Sloan	09/11/02	Vaughn Battery Company	Closed 12/18/02		Report on Monitoring	Compliance
32	Fluorescent Tubes and Halide Bulbs	Ruby Hall Carolyn Collins	09/11/02	Recycle through Mercury Waste Solutions Inc. (Centralize to Main Tool Crib)	Closed 12/18/02		Tubes and Bulbs will be reported on monthly Recycling Report 12-28-02	Compliance
35	Deteriorated steam lines	Steve White/ David Saul	8/15/03	Cooling coils will increase better efficient use of city water and in turn reduce water going to 005 outfall	Closed	Dec 2003	Cost saving on coils and a Safety concern	Save 1 million gallons per year on water use.
48	City of Fay. raised cost on water usage	Jeff Milford	9/19/03	Meeting with City to try to lower price per gallon of water	Closed	Dec 2003	50% increase in water cost	Reduced increase by \$135,000/yr

GRAY AREAS ARE CLOSED ISSUES

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins
 Updated: 8/6/04
 Meeting: 8/6/04

Champion: Garnett Wise/Lynn Pate
Responsible Management Representative: PS Reddy
Current Objective: Reduce Hazardous Waste by 10%

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
38	Reduce Natural Gas Usage	Jeff Milford	09/11/02	Smart Fire not feasible for burner controls R&D in Fayetteville	Closed	2003	Non economical	Reduce natural gas consumption, after installed will do study on cost saving
39	Clear Coat Powder and Primer 17/18 wheels per lb Going backward.	Milan Roy	09/11/02	Reclamation system in use. Looking for a Recycler	Closed No change	10/30/03	Recycle Clear Coat powder and primer. Recycler will not pay for this Corp wants to look at this	\$133,750 per year Reduce Waste disposal by 95%.
41	Foam packing on wheels	Carolyn O'Donnell	5/16/03	See if can recycle the used foam packing on wheels between pallets.	Closed	9/19/03	Carolyn will report finding next meeting	\$7,000 Quarterly saving by not being land filled
42	Gas usage on Heat Treat Oven	Tom Sargent	5/16/03	Track and determine why there is a saving on gas usage. Will have data 4 th quarter.	Closed	Dec 2003	Add pre-heat chamber.	\$?

GRAY AREAS ARE CLOSED ISSUES

A-2t

OBJECTIVES AND TARGETS MATRIX EC-003

SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

CC: PS Reddy
Bob Bracy
Buddy Hawkins

Champion: Garnett Wise/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Hazardous Waste by 10%

Updated: 8/6/04
Meeting: 8/6/04

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
44	Excess Compound from Rotary Polisher	Lynn Pate	1-16-03	Install a brush on Rotary Polisher to remove excess compound. Ck BP02 records to compare pass usage	Closed	09/2003	wheel count before dump and remake increased by 50%	\$26K annual savings

GRAY AREAS ARE CLOSED ISSUES

A-2u

OBJECTIVES AND TARGETS MATRIX EC-003
SUPERIOR INDUSTRIES – FAYETTEVILLE CASTING & PLATING PLANT

PS Reddy
 Bob Bracy
 Buddy Hawkins
CC:

Updated: 8/6/04
 Meeting: 8/6/04

Champion: Garnett Wise/Lynn Pate

Responsible Management Representative: PS Reddy

Current Objective: Reduce Non-Hazardous Solid Waste

No.	ISSUE	ASSIGNED TO	DATE ASSIGNED	ACTION REQUIRED	STATUS	COMPLETION DATE	REMARKS	SAVINGS AND/OR BENEFIT
49	MF Burner gas usage	Jeff Milford	11/21/03	Optimize Air/Gas Ratio	Closed	December 2003	Save 5%	\$63,160
55	Natural Gas Costs	Jeff Milford		Negotiate reduction in Natural Gas Transportation Costs	Closed	Oct 2003	Transport Rate 0.533/Mcf to 0.498/Mcf Fuel 5.17% to 4.62%	\$ 43,105
56	Water Usage	Lynn Pate	01/01/04	Dump Bright Polish Rinses once a week instead of daily	Closed	March 2004	No change in Rinse TDS	Annual Savings of 353,808 gallons

GRAY AREAS ARE CLOSED ISSUES

A-2v

SUPERIOR INDUSTRIES INT'L, INC.
FAYETTEVILLE CASTING AND PLATING PLANTS

ASPECTS AND IMPACTS IDENTIFICATION TABLE (EC-004)

Rank aspects using a scale of 1-5. Highest numbers will be the first aspects to address.

- Frequency (1 = infrequent; 5 = constant)
- Environmental Impact (1 = minor; 5 = severe)
- Noncompliance Issues (1 = minor fine; 5 = major fine)
- Feasibility (1 = Not feasible; 5 = very feasible)
- Company Cost Savings (1 =< \$1,000; 5 => \$100,000)
- Views of Interested Parties (1 = favorable; 5 = unfavorable)

Date: 4/6/2004

ASPECT	VIEWS OF INTERESTED PARTIES	FREQUENCY	ENVIRONMENTAL IMPACT	NON-COMPLIANCE	FEASIBILITY	COMPANY COST	TOTAL POINTS
Hexavalent Chrome	5	5	3	1	5	1	20
Air Emissions	5	5	3	3	3	1	20
Utilities	2	5	2	1	4	5	19
Non-Hazardous Solid Waste	3	5	2	1	3	5	19
Hazardous Waste	2	5	3	1	3	5	19
Indoor Air Quality	3	5	2	1	4	1	16

Signature/Date:

<u>[Signature]</u> 14-6-04	<u>[Signature]</u> 15/17/04
<u>[Signature]</u> 14/29/04	<u>[Signature]</u> 15-17-4
<u>[Signature]</u> 14/29/04	<u>[Signature]</u> 15/18/04
<u>[Signature]</u> 14/29/04	<u>[Signature]</u> 15/24/04
<u>[Signature]</u> 14/29/04	<u>[Signature]</u> 15/24/04
<u>[Signature]</u> 14/29/04	<u>[Signature]</u> 15/24/04
<u>[Signature]</u> 5/14/04	<u>[Signature]</u> 5-1-04

FENV-1004/1009

EC-004

FORM # FENV-0021

11/22/02

A-2w



SUPERIOR INDUSTRIES INTERNATIONAL, INC.

1901 Borick Drive • Fayetteville, AR 72701

Phone 479-443-7870 • Fax 479-442-4219

Fayetteville EC-005

ISO 14000

MSDS SUBMITTAL FORM

		EC-005 Origination Date: _____	
Environmental Approval	Signed by: _____	Date: _____	
Safety Approval	Signed by: _____	Date: _____	
Wastewater Approval	Signed by: _____	Date: _____	
Purchasing Acknowledgement	Signed by: _____	Date: _____	
Return completed approved or denied form to the Environmental office			

MSDS PRODUCT NAME: _____

MSDS ID NUMBER/REVISION DATE: _____

VENDOR/MANUFACTURER NAME: _____

MAJOR CHEMICAL INGREDIENTS: _____

PRODUCT REQUESTED BY: _____

PURPOSE/USE/COMMENTS: _____

DEPARTMENT(S) TO BE USED IN: _____

IS THIS AN EXPERIMENTAL TRIAL: YES NO (If YES, 1 Month Safety Follow-up)

BUY CARD NUMBER (if applicable): _____

PRODUCT REPLACED (if any): _____

REFER TO SAF-1004 FOR PROCEDURE METHOD

PURCHASING HEIRARCHY	PURCHASING GUIDELINES
Prevention	Environmentally friendly options
Reuse	Lower energy consumption
Recycle	Recyclable
Treatment	Best environmental option
Disposal	Design for the environment

Attachment A-3

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 alodine coating and chrome plating 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 also with any applicable provisions of local, federal or State of Arkansas laws or regulations,

**Superior Industries International, Inc.
1901 Borick Drive
Fayetteville, AR 72701,**

hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC Nos. 3363, 3398, 3471, and 3479 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.

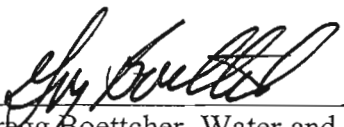
Noncompliance with any term or condition of this permit shall constitute a violation of the Fayetteville Code.

This permit shall become effective on **October 1, 2003** and authorization to discharge shall expire at midnight on **February 29, 2008**. 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 16th day of September, 2003

Approved By: _____


Gregg Boettcher, Water and Wastewater Director
City of Fayetteville

FILE COPY

TABLE OF CONTENTS

PART I - SPECIFIC CONDITIONS, LIMITATIONS, AND REQUIREMENTS I-1

SECTION A. WASTESTREAM LOCATIONS I-1

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS I-2

SECTION C. COMPLIANCE SCHEDULE I-3

SECTION D. OTHER SPECIFIC REQUIREMENTS I-3

 1. *Sample Storage Program* I-3

 2. *Pollution Prevention* I-3

PART II - STANDARD MONITORING, RECORD KEEPING & REPORTING REQUIREMENTS... II-1

SECTION A. MONITORING II-1

 1. *Monitoring by Approved Methods* II-1

 2. *Sampling Facility and Monitoring Equipment* II-1

 3. *Representative Sampling* II-1

 4. *24-Hour Reporting and Automatic Resampling* II-2

 5. *Flow Measurement Devices and Method* II-2

SECTION B. RECORD KEEPING II-2

 1. *Retention of Records* II-2

 2. *Record Contents* II-3

 3. *Manifest of Wastes Removed* II-3

 4. *Duty to Provide Information* II-3

 5. *Availability of Data* II-3

SECTION C. REPORTING II-3

 1. *Discharge Monitoring Report* II-3

 2. *Compliance Schedule Reporting* II-4

 3. *Averaging Measurements and Detection Limits* II-5

 4. *Notification of Unusual Loadings* II-5

 5. *Planned Changes* II-5

 6. *Notification of Shutdown* II-5

 7. *Anticipated Noncompliance* II-6

 8. *Twenty-four Hour Reporting (Bypass, Upset, Spill, Slug, or Noncompliance)* II-6

 9. *Other Noncompliance* II-6

 10. *Certification in Lieu of Monitoring* II-6

 11. *Signatory Requirements* II-7

 12. *Address for Report Submissions* II-7

PART III - STANDARD CONDITIONS III-1

SECTION A. GENERAL CONDITIONS III-1

 1. *State Laws* III-1

 2. *Limitations Subject To Revision* III-1

 3. *Property Rights* III-1

 4. *Regulatory Changes* III-1

 5. *Toxic Pollutants* III-2

 6. *Severability* III-2

 7. *Permit Modification, Revocation, Suspension, Termination* III-2

 8. *Permit Transfer* III-2

 9. *Duty to Reapply* III-2

 10. *Continuation of Expired Permits* III-3

SECTION B. OPERATION AND MAINTENANCE III-3

 1. *Proper Operation and Maintenance* III-3

 2. *Need to Halt or Reduce Not a Defense* III-3

 3. *Duty to Mitigate* III-3

 4. *Bypass of Treatment System* III-3

 5. *Affirmative Defense* III-4

6.	<i>Removed Substances and RCRA Requirements</i>	III-4
7.	<i>Disposal of Sludges and Spent Chemicals</i>	III-4
8.	<i>Emergency Action</i>	III-4
9.	<i>Dilution Not Permitted</i>	III-5
SECTION C. RESULTS OF NONCOMPLIANCE		III-5
1.	<i>Duty to Comply</i>	III-5
2.	<i>Penalties for Violations of Permit Conditions</i>	III-5
3.	<i>Permit Suspension, Revocation and Termination</i>	III-5
4.	<i>Tampering</i>	III-5
5.	<i>Falsification of Reports</i>	III-5
6.	<i>Publication in Newspaper for Significant Noncompliance</i>	III-6
7.	<i>Civil and Criminal Liability</i>	III-6
PART IV - OTHER REQUIREMENTS		IV-1
SECTION A. RIGHT OF ENTRY		IV-1
SECTION B. BOILER SYSTEM		IV-1
SECTION C. ACCIDENTAL SPILL/SLUG PREVENTION PLAN		IV-1
PART V - DEFINITIONS		V-1
PART VI - OMI AUTHORIZATION		VI-1
ATTACHMENT A - SIGNATORY AUTHORIZATION		1

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 treated paint room and treated alodine 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 treated wastewater from the paint room, premelt, heat treat, and clear coat room process-generated wastestreams. 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

This wastestream shall consist of the treated wastewater from the cyanide destruct unit before mixing with other wastestreams. Location 004 shall be a valve on a support column in the waste treatment area just east of the overhead door on the south side of the room. The quality of the effluent discharged from Location 004 shall, at a minimum, meet the cyanide limitations as set forth in Table I-1.

Location 005

This wastestream shall consist of the treated wastewater from all processes and shall include wastestreams from Locations 003 and 006. Location 005 shall be in the Parshall flume in the manhole approximately 420 feet north of the plating plant. 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

This wastestream shall consist of the treated wastewater from all electroplating process-generated

wastestreams including wastewater from Location 004. 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 cyanide and flow usage, which apply as specified in the Table I-1 footnotes. The Permittee shall monitor the discharge from **Locations 004** and **005**, and the incoming water usage, and be limited as specified below:

Table I-1						
Parameter	LIMITATIONS ¹				MONITORING REQUIREMENTS ²	
	Daily Maximum		Monthly Average ³		Frequency ⁴	Sample Type
	(mg/l)	(lb./day)	(mg/l)	(lb./day)		
Cadmium, total	0.11	0.056	0.07	0.030	2/week	24-hr composite
Chromium, total	2.77	1.262	1.71	0.686	2/week	24-hr composite
Copper, total	3.38	2.345	2.07	1.274	2/week	24-hr composite
Lead, total	0.69	0.236	0.43	0.128	2/week	24-hr composite
Nickel, total	3.98	3.048	2.38	1.656	2/week	24-hr composite
Silver, total	0.43	0.212	0.24	0.115	2/week	24-hr composite
Zinc, total	2.61	3.279	1.48	1.782	2/week	24-hr composite
Cyanide, total ⁵	1.20	0.224	0.65	0.122	3/week	Grab
TTO, 40 CFR 433	2.13	-	-	-	NA	Certification ⁶
Flow, Usage ⁷	Report		Report		Continuous	Totalizer ⁸
Flow, Discharge	Report		Report		Continuous	Totalizer ⁸

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 (mg/l): 0.001 cadmium, 0.01 chromium, 0.01 copper, 0.005 lead, 0.0002 mercury, 0.04 nickel, 0.002 silver, 0.02 zinc, 0.01 cyanide.

² The Permittee shall perform daily process control analysis and maintain documentation for copper, chromium, and nickel samples collected at Location 005 on all discharge days.

³ Monthly average is the average of all daily results regardless of the number of samples analyzed.

⁴ Week means Sunday through Saturday. Month means calendar month.

⁵ Cyanide samples must be collected from Location 004 unless no process water has flowed through Location 004 during the monitoring day.

⁶ 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.

- ⁷ 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.
- ⁸ 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. Sample Storage Program

The Permittee will collect a daily composite sample of the discharge from Location 005 on all discharge days in accordance with sampling practices in this permit. The Permittee may use samples for analyses required in this permit. Any samples not used for required analysis must be preserved and stored for a minimum of 30 days. The Industrial Pretreatment Coordinator may collect and/or analyze these samples at the Control Authority's discretion.

2. 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.

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.

A-3g

4. 24-Hour Reporting and Automatic Resampling

If the results of the Permittee's analysis indicates that a violation of this permit has occurred, 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
- l. Compliance statement
- m. TTO certification statement if a TTO 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 to 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

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 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 written 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 contain the following:

1. General information
2. Facility layout and flow diagram
3. Chemical and materials inventory
4. Spill/slug prevention equipment and procedures
5. Emergency response equipment and procedures
6. Spill/slug reporting and plan modification procedures
7. Training program
8. 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

23092
2003
M

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. 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.

Effective Date

If authorized signatory at left is a (3) above,
she/he is authorized by:

Authorized Signatory (Print)

Name (Print)

Authorized Signature

Signature

Title

Title

Authorization Revoked by:

Signature of a Current Authorized Signatory

Date Revoked

Fact Sheet For Superior Industries International, Inc.			
Part I. Industry Specific Information			
A1.	Company Name, Facility Address, Telephone	A2.	Company Name, Mailing Address
	Superior Industries International, Inc. 1901 Borick Drive Fayetteville, AR 72701 (479) 443-7870		Superior Industries International, Inc. 1901 Borick Drive Fayetteville, AR 72701
B1.	Primary Contact Name, Title, Telephone, Fax, E-mail		
	Robert D. Bracy Vice President Facilities Engineering (479) 443-7870 ext. 6222 (479) 442-4219 Fax bbracy@supind.com		
B2.	Secondary Contact Name, Title, Telephone, Fax, E-mail		
	Chris Roddam Environmental Engineer (479) 443-7870 x 6286 (479) 442-4219 Fax croddam@supind.com		
C1.	Company Owner	C2.	Company Operator
	Superior Industries International, Inc.		Superior Industries International, Inc.
D1.	SIC Code(s) and Description	D2.	Categorical Determination
	3363 Aluminum Die Casting 3479 Coating, Engraving, and Allied Services, Not Elsewhere Classified 3471 Electroplating, Plating, Polishing, Anodizing, and Coloring 3398 Metal Heat Treating		CIU: 40 CFR 433 SIU: CIU and potential for metals New Source Determination Date: New Source, 433.17, 8/32/82 SUP New Source 10/94 (Chrome plant went on-line)
D3.	Description of Operations	D4.	Production Data
	Cast Aluminum Automobile Wheels. Chrome Plate Aluminum Automobile Wheels. Plating pretreatment, copper plating, polishing, nickel and chrome plating, final polishing. Stripping of flawed coatings.		NA Cast aluminum wheels: 60,000 – 80,000/week Chrome plated wheels: 16,000/week Bright polished aluminum wheels: 16,000/week
D5.	Description of Existing Pollution Abatement Facilities	D6.	Description of Existing Pollution Abatement Programs
	Pretreatment plant: Chemical precipitation, chlorination, filtration, ion exchange, neutralization/pH correction, and sedimentation.		Toxic Organic Management Plan. Contingency Plan (ASPP).

E. Effluent Limitations (Permit Limits chosen are highlighted below)						
E1. Categorical Limitations			E2. Local Limitations			
40 CFR 433.17 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	0.11	0.07	As	0.68		
Cr	2.77	1.71	Cd	0.02		
Cu	3.38	2.07	Cr	0.48		
Pb	0.69	0.43	Cu	0.23		
Ni	3.98	2.38	CN	0.01		
Ag	0.43	0.24	Pb	0.15		
Zn	2.61	1.48	Hg	0.0002		
CN	1.2	0.65	Ni	0.2		
TTO	2.13		Ag	1.23		
			Zn	1.52		
E3. Allocations (from TBL0298 + allocations.xls)			E4. Other Limitations (specify, such as performance based, State limits, etc.):			
Limits are in lb./day			Performance-based (1995 data). Limits are in lb./day			
Parameter	Daily Max	Monthly Avg.	Parameter	Daily Max	Monthly Avg.	
Cd	0.1707	= (Daily Max * 1.69/3.11)	Cd	0.0560	= (Daily Max * 1.69/3.11)	
Cr	5.2861		Cr	1.1219		
Cu	2.5666		Cu	2.3454		
Pb	0.9113		Pb	0.2363		
Ni	3.0478		Ni	6.7486		
Ag	8.9196		Ag	0.2115		
Zn	5.9626		Zn	1.5126		
CN	0.2243	CN	0.4384			
<p>1998: Superior comments on the permit effective 3/1/98 included a request to increase their Zn daily mass limits to 2.915 lb./day and monthly average mass limits to 1.583 lb./day. This was approved, but the 2.875 limit was written based on a factor at the end of the request letter. Use 2.915 lb./day as the daily mass limit and 1.584 lb./day (formula from E3 & E4 above) as the monthly average mass limit for Zn in the next permit. These changes are an increase in performance limits based on an expected change and are still more stringent than allocated levels.</p> <p>2003: Superior requested a 12.5 % mass limit increase in Cr, Cu, Ni, Zn, & CN in a letter dated 4/4/2003. The following allows at least a 12.5% increase: Raised performance based Cr 12.5% to 1.2621 lb./day daily max. Raised Cu from original TBL0 to original performance-based (<2/98 TBL0, but >12.5%). Raised Ni & CN limits from original TBL0 to 2/98 TBL0 allocations. Raised Zn 12.5% from 2.915 intended 1998 limit to 3.279 lb./day. Monthly average mass limits are calculated from daily max. These increased limits are based on an updated TBL0 and expected change applied to performance based limit, and are equal to or more stringent than TBL0 allocated levels.</p>						
E5. Rate & frequency of discharge; avg. & max. daily flow						
Location: SUP004 Avg. daily discharge = 0.024 MGD Max daily discharge = 0.024 MGD			Location: SUP005 Avg. daily discharge = 0.600 MGD Max daily discharge = 0.791MGD			

A-4

	Estimated discharge in 5 years (in 2008) at SUP005 is 0.720 MGD. Plan to increase wheel production by 12% over year 2003 by adding additional equipment.
E6.	Discharge Location(s) – Location designation, description of discharge, specific location, and where to sample
	<p>Location 001 Location 001 was re-piped so no wastewater goes through it. The treated paint room and treated alodine 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.</p>
	<p>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.</p>
	<p>Location 003 This wastestream shall consist of the treated wastewater from the paint room, chromium waste destruct system (alodine), premelt, heat treat, and clear coat room process-generated wastestreams. Location 003 shall be after the throat of the 3” Parshall flume which 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.</p>
	<p>Location 004 This wastestream shall consist of the treated wastewater from the cyanide destruct unit before mixing with other wastestreams. Location 004 shall be a valve on a support column in the waste treatment area just east of the overhead door on the south side of the room. The quality of the effluent discharged from Location 004 shall, at a minimum, meet the cyanide limitations as set forth in Table I-1.</p>
	<p>Location 005 This wastestream shall consist of the treated wastewater from all processes and shall include wastestreams from Locations 003 and 006. Location 005 shall be in the Parshall flume in the manhole approximately 420 feet north of the plating plant. The quality of the effluent discharged from Location 005 shall, at a minimum, meet the limitations as set forth in Table I-1.</p>
	<p>Location 006 This wastestream shall consist of the treated wastewater from all electroplating process-generated wastestreams including wastewater from Location 004. Location 006 shall be after the throat of the 3” Parshall flume which 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.</p>

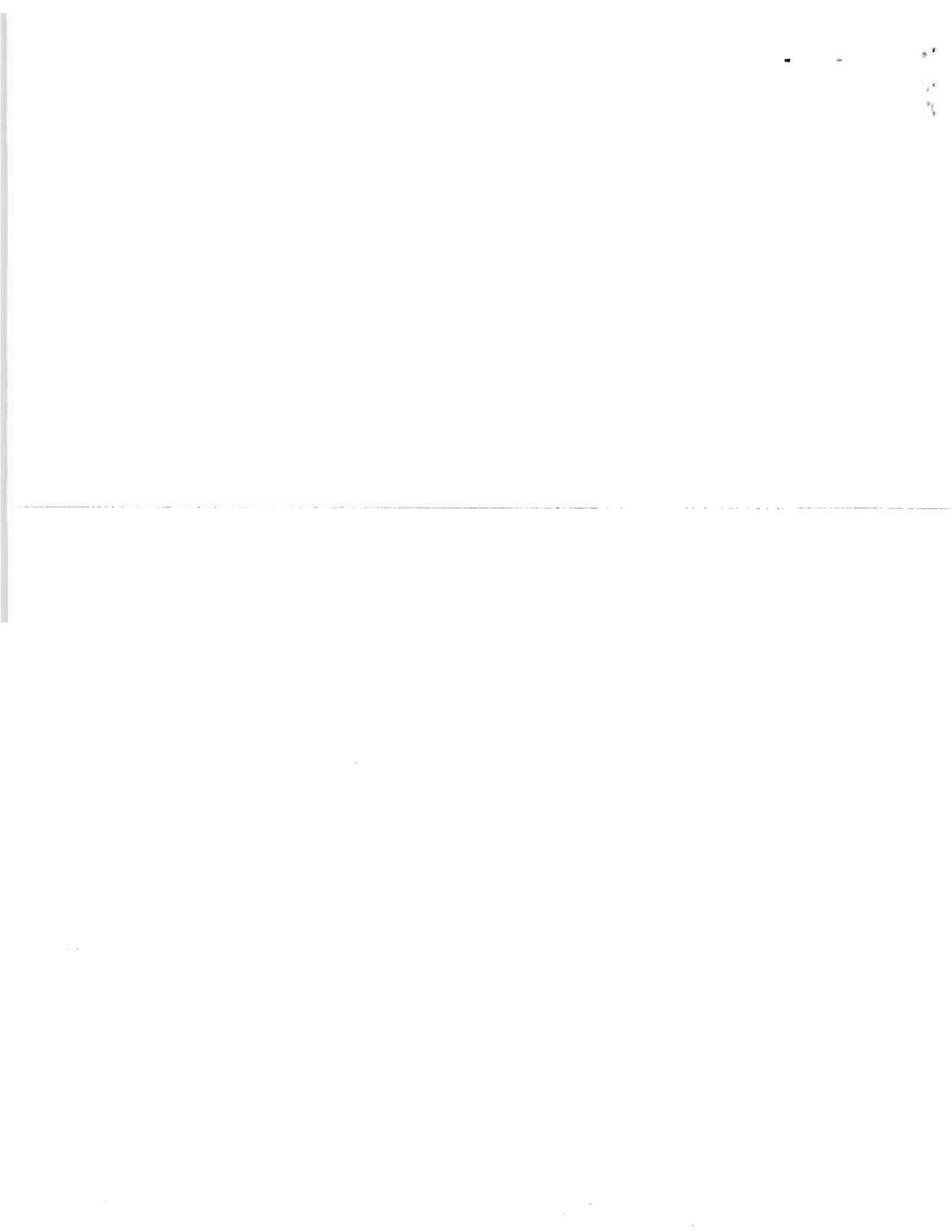
A-4c

E7. & E8.	Permit Limitations & Monitoring Requirements (Table I-1)						
	Rationale for selecting limits: selected most stringent.						
	Concentration limits are from 40CFR433.17 because no other limits are concentration limits. Mass limits are the most stringent of performance limits and allocations. Ni and CN mass limits are from allocations. Cd, Cu, Pb, and Ag mass limits are performance limits (1995 data). Cr mass limits are from 1995 performance based times a projected 2003 increase. Zn mass limits are from 1995 performance based with a 1998 requested increase and 2003 requested increase – see E4.						
	Rationale for monitoring frequencies: 2/week for metals because of demonstrated control of metals, required process control analysis (Table footnote), and required sample storage program (Part I, Section D, 1.) at SUP005. 3/week for CN because of intermittent problems controlling CN. No actual or suspected TTO problems. Use standard TTO certification language.						
	Location 005 except CN is Location 004						
	Parameter	Daily Max mg/L	Monthly Avg. Mg/L	Daily Max lb./day	Monthly Avg. lb./day	Monitoring Freq.	Type Sample
	Cd	0.11	0.07	0.056	0.030	2/week	24-hour comp
	Cr	2.77	1.71	1.122	0.610	2/week	24-hour comp
	Cu	3.38	2.07	2.345	1.274	2/week	24-hour comp
	Pb	0.69	0.43	0.236	0.128	2/week	24-hour comp
	Ni	3.98	2.38	3.048	1.656	2/week	24-hour comp
	Ag	0.43	0.24	0.212	0.115	2/week	24-hour comp
	Zn	2.61	1.48	2.915	1.584	2/week	24-hour comp
	CN	1.2	0.65	0.224	0.122	3/week	24-hour comp
	TTO	2.13	----	----	----	NA	Certification
E9.	Reporting Requirements						
	Once per month a summary of monitoring data is required for the previous calendar month. Other standard reporting requirements will be included.						
E10.	Standard Conditions						
	The industrial permit will include all of the standard conditions listed in the City's standard significant industrial users permit.						
E11.	Special Requirements						
	Table footer to require process control analysis for metals at SUP005 Sample Storage Program Pollution Prevention Reassessment						
E12.	Attachments						
	Standard signatory authorization form.						
E13	Permit:						
	Permit Number FAY09 Latest renewal permit draft effective March 1, 2003 – February 29, 2008						

A-4-d

Part II. Publicly Owned Treatment Works (POTW) Specific Information			
A1.	Name, Address and Telephone of POTW Receiving Wastewater	POTW Mailing Address	
	Paul R. Noland Wastewater Treatment Facility 1400 N. Fox Hunter Road Fayetteville, AR 72701 (479) 443-3292	Paul R. Noland Wastewater Treatment Facility 1400 N. Fox Hunter Road Fayetteville, AR 72701 (479) 443-3292	
B1.	Industrial Pretreatment Primary Contact, Title, Telephone, Fax, E-Mail		
	Denise Georgiou Industrial Pretreatment Coordinator (479) 443-3292 Tele (479) 443-5613 Fax dgeorgiou@arkansasusa.com		
C1.	Name, Address, and Telephone of POTW Owner	C2.	Name, Address, and Telephone of POTW Contract Operator
	City of Fayetteville 113 W. Mountain Street Fayetteville, AR 72701 (479) 575-8330		OMI 1400 N. Fox Hunter Road Fayetteville, AR 72701 (479) 443-3292
			Operation and maintenance of the City of Fayetteville POTW is performed by a private contractor. The contractor also provides technical assistance to City staff and acts as the City's agent in the day to day contact and interface with industrial, commercial, and private users of the POTW.

A-4e





SUPERIOR INDUSTRIES INTERNATIONAL, INC.

1901 BORICK DRIVE • FAYETTEVILLE, AR 72701
(501) 443-7870 • FAX (501) 443-4522

CERTIFIED MAIL RETURN RECEIPT REQUESTED: 7099 3400 0006 5304 1573

January 2, 2001

Denise Georgiou
Industrial Pretreatment Coordinator
OMI, Inc.
1500 North Fox Hunter Road
Fayetteville, AR 72701

Dear Denise,

Enclosed is the Toxic Organic Management Plan for Superior Industries in Fayetteville.

If you have any questions, please feel free to call me.

Sincerely,

V. Lynn Pate
Environmental Engineer

Fax
Delivery
Rec'd Postmark 010301 Data Entry DS NOV DS

FILE 689A

**TOXIC ORGANIC MANAGEMENT PLAN
SUPERIOR INDUSTRIES INTERNATIONAL, INC.
1901 BORICK DRIVE
FAYETTEVILLE, ARKANSAS 72701**

I. DESCRIPTION OF FACILITIES AND SOLVENT USE

A. Process Description

Superior Industries International, Inc. is a major supplier of automotive products. The Fayetteville Division manufacture aluminum wheels for the automotive manufacturers. Aluminum ingots are melted and cast in low-pressure permanent casting machines to form wheel castings. Wheel casting are heat treated, washed, and then either a) chromated, painted, machined, clear-coated, or b) polished and chrome plated prior to shipping.

Wastewater types and volumes are depicted in Figure 1, and the current wastewater treatment systems are depicted in Figure 2. The primary waste stream is generated in the plating operations and paint department operations. In the plating department all plating rinses are processed through the waste treatment system to reduce chrome to trivalent, destruct cyanide, and the processed through metal hydroxide precipitation. The treated water is then tested and released to the POTW. The metal hydroxide sludge is filter pressed, dried, and shipped as Regulated F006 waste to approved recycling/disposal sites.

In the paint department, contaminated chromate acid rinse is recirculated through a Deionization unit to remove the hexavalent chromium. The rinse water is reused. Every 6 months, the chromate dip and rinse tanks are dumped and recharged. Regenerate wastes from the DI units and the waste chromate dip and rinses are transferred to two above ground storage tanks in the chrome plating plant. This waste is also treated through a metal hydroxide precipitation system, tested, and then released to the POTW.

Secondary waste streams are acids and alkalis used in the cleaning of molds and mold parts. In the event these chemicals are disposed of, the materials are neutralized to an acceptable pH range and discharged into the sanitary sewer. Any residue from the neutralization is placed in proper container and is sent to a certified recycling center.

All coolants used in the machining process are now being sent to a certified recycling center for recycling.

A-56

Fax
Deliver
Rec'd Postmark 010301 *DB* Data Entry — *DB* NOV — *DB*

B. Identification of Toxic Organic Chemicals Entering the Plant Wastewater

Chemical Analysis of Treated Waste streams

Samples were taken of the plants treated waste streams for analysis for the 110 toxic organics regulated under the metal finishing categorical pretreatment standards. Samples collected were 24-hour flow proportioned composite samples for acid extraction and base/neutral compounds. Grab samples for volatile organics were taken every four hours and were composited before analysis. Samples were taken over a period when all production lines were operating at peak production rates. Samples were analyzed by gas chromatography with compound identification and quantification by mass spectrophotometer (GC/MS). EPA procedures 624 and 625 were followed for GC/MS analysis. Toxic organic compounds were not detected at concentrations greater than 0.01 mg/l.

C. Identification of Solvent used in Manufacturing Operations.

The primary manufacturing operations used by Superior does not contain solvents. A listing of process chemicals is attached as "Exhibit 1". Secondary operations using solvent and other toxic organics are reviewed below.

1. Miscellaneous solvents are used in small quantities in the laboratory. Spent solvents are collected in the lab and are removed by Used Oil Services.
2. Solvent Storage Areas - The primary storage area for solvents is the tool crib area. The tool crib is a controlled area with a 6-foot fence and an attendant 24 hours a day. All materials are logged in and out of the tool crib. Materials are released only to authorized personnel. There are no floor drains in the tool crib area.

II DESCRIPTION OF CONTROL OPTIONS EXPLORED

The manufacturing operation at Superior was designed for limited use of solvents and toxic organic compounds. Based on the current facility design, manufacturing processes and the wastewater analysis, no additional control options are considered necessary at this time. In the event that additional controls are needed every effort will be made to explore and implement additional controls. The introduction of new processes and facility changes will be carefully reviewed to maintain and improve the control of Toxic Organic compounds at Superior.

III TOXIC ORGANIC MANAGEMENT PLAN

Superior believes that all of its toxic organic pollutant discharge can be controlled by a toxic organic management plan in lieu of routine toxic organic monitoring.

IV. CERTIFICATION

"Based on my inquiry of the person or persons directly responsible of managing compliance with the TTO limitations, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing of the last report. I further certify that this facility is implementing this toxic organic pollutant management plan submitted to the Control authority on December 12, 1997."



Robert D. Bracy
Vice-President of Facilities Engineering
Superior Industries International, Inc.
Telephone: (501) 443-7870

Figure 2. Waste Treatment Systems

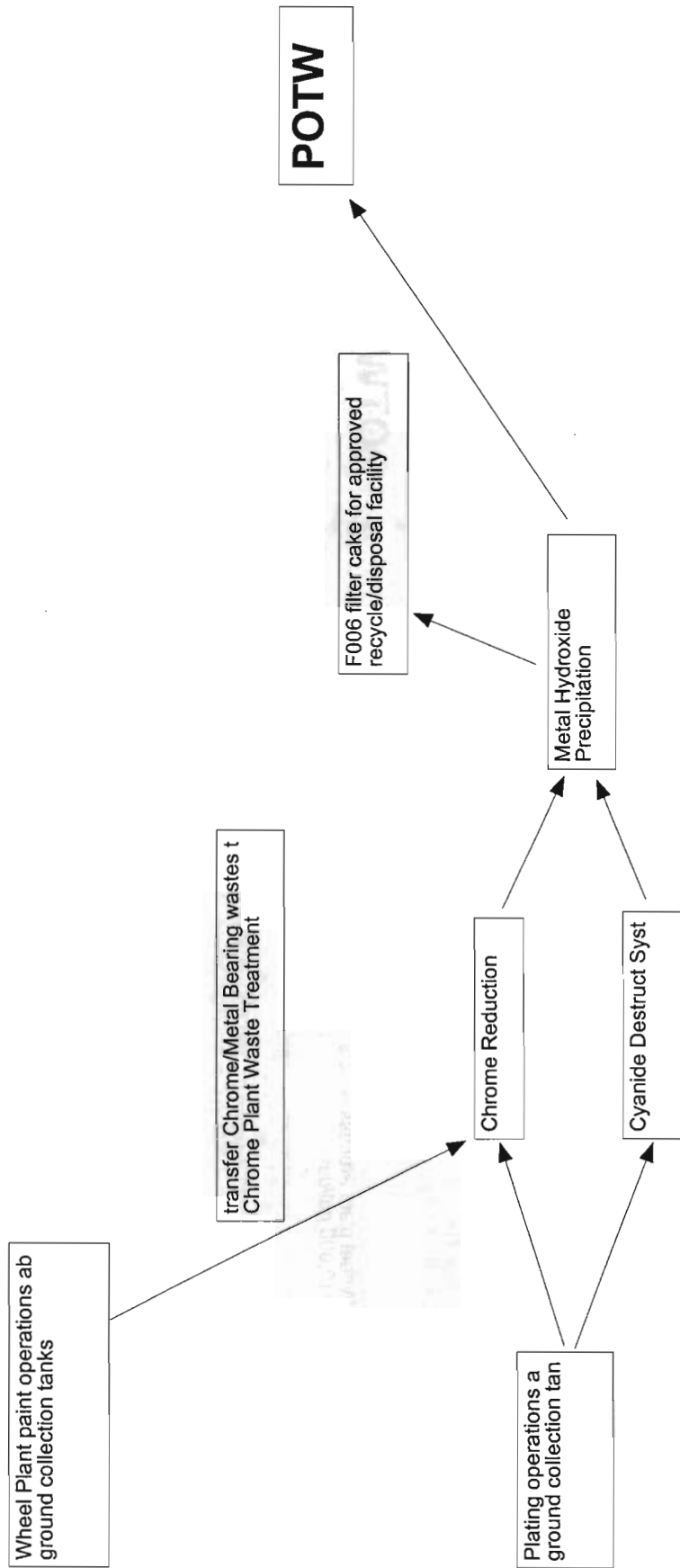
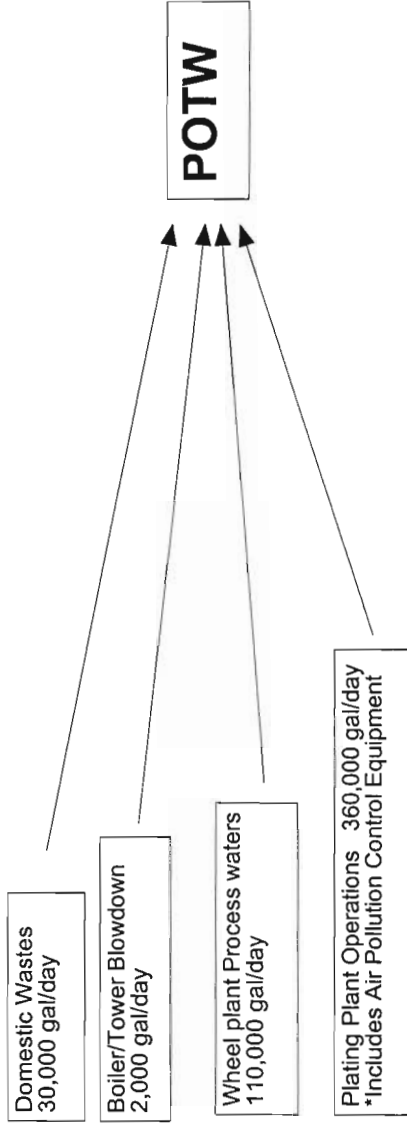


Figure 1. Waste Water Types and Volumes





Operations Management International, Inc.
ATTN: Mr. Bruce Richart
1400 North Fox Hunter Road
Fayetteville, AR 72701

Dear Mr. Bruce Richart:

Project Description: Nine (9) water sample(s) received on October 14, 2005

This report is the analytical results and supporting information for the samples submitted to American Interplex Corporation (AIC) on October 14, 2005. The following results are applicable only to the samples identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the appropriate laboratory director or a qualified designee.

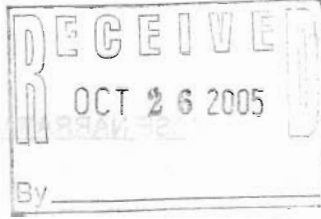
Data has been validated using standard quality control measures (blanks, laboratory control samples, spike and spike duplicates) performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

Enclosure(s): Chains of Custody

Attachment A-6

FILE COPY

October 24, 2005
Control No. 94492
Page 1 of 8



OCT 05
INF }
EFF } CN PHENOLS
MTI, SUP - METALS, CN
INF } METALS
MC }
WR }

AMERICAN INTERPLEX CORPORATION

By John Overbey
John Overbey
Laboratory Director

Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 1°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

COMMENTS

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

"Standard Methods for the Examination of Water and Wastewaters", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

A-6 b

Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

ANALYTICAL RESULTS

AIC No. 94492-1

Sample Identification: Effluent 101005 1600 -> 101105 0800

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	EPA 335.2	< 0.005	0.005	mg/l	W15007	
Total Recoverable Phenolics	EPA 420.1	0.011	0.005	mg/l	W14949	✓

AIC No. 94492-2

Sample Identification: Influent 101005 1001 -> 101105 0210

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	EPA 335.2	< 0.005	0.005	mg/l	W15007	✓
Total Recoverable Phenolics	EPA 420.1	0.038	0.005	mg/l	W14949	

AIC No. 94492-3

Sample Identification: SUP-004 101005/0955

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	EPA 335.2	< 0.005	0.005	mg/l	W15082	✓

AIC No. 94492-4

Sample Identification: MTT-001 101205/0957

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	EPA 335.2	0.026	0.005	mg/l	W15082	✓

AIC No. 94492-5

Sample Identification: SUP-005 101005 0935 -> 101105 0932

Analyte	Method	Result	RL	Units	Batch	Qualifier
Cadmium	EPA 200.8	0.00017	0.0001	mg/l	S16869	
Chromium	EPA 200.8	0.088	0.001	mg/l	S16869	
Copper	EPA 200.8	0.33	0.001	mg/l	S16869	
Lead	EPA 200.8	0.0054	0.001	mg/l	S16869	✓
Nickel	EPA 200.8	0.35	0.001	mg/l	S16869	
Silver	EPA 200.8	< 0.0002	0.0002	mg/l	S16869	
Zinc	EPA 200.8	0.065	0.002	mg/l	S16869	

AIC No. 94492-6

Sample Identification: MTT-001 101205 0957 -> 101305 0940

Analyte	Method	Result	RL	Units	Batch	Qualifier
Cadmium	EPA 200.8	0.00051	0.0001	mg/l	S16869	
Chromium	EPA 200.8	0.022	0.001	mg/l	S16869	
Copper	EPA 200.8	0.098	0.001	mg/l	S16869	
Lead	EPA 200.8	0.018	0.001	mg/l	S16869	
Nickel	EPA 200.8	0.012	0.001	mg/l	S16869	✓
Silver	EPA 200.8	0.0010	0.0002	mg/l	S16869	
Zinc	EPA 200.8	0.65	0.002	mg/l	S16869	

A-6c

Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

ANALYTICAL RESULTS

AIC No. 94492-7

Sample Identification: WR (EFF) 101005 0808 -> 101105 0552

Analyte	Method	Result	RL	Units	Batch	Qualifier
Antimony	EPA 200.8	< 0.003	0.003	mg/l	S16869	
Arsenic	EPA 200.8	< 0.001	0.001	mg/l	S16869	
Beryllium	EPA 200.8	< 0.0003	0.0003	mg/l	S16869	
Cadmium	EPA 200.8	< 0.0001	0.0001	mg/l	S16869	
Chromium	EPA 200.8	< 0.001	0.001	mg/l	S16869	✓
Copper	EPA 200.8	0.0023	0.001	mg/l	S16869	
Lead	EPA 200.8	< 0.001	0.001	mg/l	S16869	
Nickel	EPA 200.8	0.014	0.01	mg/l	S16869	
Selenium	EPA 200.8	< 0.002	0.002	mg/l	S16869	
Silver	EPA 200.8	< 0.0002	0.0002	mg/l	S16869	
Thallium	EPA 200.8	< 0.001	0.001	mg/l	S16869	
Zinc	EPA 200.8	0.023	0.002	mg/l	S16869	
Mercury	EPA 245.2	< 0.0002	0.0002	mg/l	S16868	

AIC No. 94492-8

Sample Identification: MC (EFF) 101005 0808 -> 101105 0552

Analyte	Method	Result	RL	Units	Batch	Qualifier
Antimony	EPA 200.8	< 0.003	0.003	mg/l	S16869	
Arsenic	EPA 200.8	< 0.001	0.001	mg/l	S16869	
Beryllium	EPA 200.8	< 0.0003	0.0003	mg/l	S16869	
Cadmium	EPA 200.8	< 0.0001	0.0001	mg/l	S16869	
Chromium	EPA 200.8	< 0.001	0.001	mg/l	S16869	
Copper	EPA 200.8	0.0015	0.001	mg/l	S16869	
Lead	EPA 200.8	< 0.001	0.001	mg/l	S16869	✓
Nickel	EPA 200.8	0.015	0.01	mg/l	S16869	
Selenium	EPA 200.8	< 0.002	0.002	mg/l	S16869	
Silver	EPA 200.8	< 0.0002	0.0002	mg/l	S16869	
Thallium	EPA 200.8	< 0.001	0.001	mg/l	S16869	
Zinc	EPA 200.8	0.024	0.002	mg/l	S16869	
Mercury	EPA 245.2	< 0.0002	0.0002	mg/l	S16868	

AIC No. 94492-9

Sample Identification: Influent 100905 1950 -> 101005 1807

Analyte	Method	Result	RL	Units	Batch	Qualifier
Antimony	EPA 200.8	< 0.003	0.003	mg/l	S16869	
Arsenic	EPA 200.8	< 0.001	0.001	mg/l	S16869	
Beryllium	EPA 200.8	< 0.0003	0.0003	mg/l	S16869	
Cadmium	EPA 200.8	0.00035	0.0001	mg/l	S16869	
Chromium	EPA 200.8	< 0.001	0.001	mg/l	S16869	
Copper	EPA 200.8	0.040	0.001	mg/l	S16869	
Lead	EPA 200.8	0.0026	0.001	mg/l	S16869	✓
Nickel	EPA 200.8	< 0.01	0.01	mg/l	S16869	
Selenium	EPA 200.8	< 0.002	0.002	mg/l	S16869	
Silver	EPA 200.8	0.0018	0.0002	mg/l	S16869	
Thallium	EPA 200.8	< 0.001	0.001	mg/l	S16869	
Zinc	EPA 200.8	0.087	0.002	mg/l	S16869	
Mercury	EPA 245.2	< 0.0002	0.0002	mg/l	S16868	

Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

SAMPLE PREPARATION REPORT

AIC No. 94492-1	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Analyte					
Total Cyanide	-	19OCT05 0819 07		W15007	
Total Recoverable Phenolics	-	17OCT05 0911 93		W14949	

AIC No. 94492-2	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Analyte					
Total Cyanide	-	19OCT05 0819 07		W15007	
Total Recoverable Phenolics	-	17OCT05 0911 93		W14949	

AIC No. 94492-3	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Analyte					
Total Cyanide	-	19OCT05 0819 07		W15082	

AIC No. 94492-4	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Analyte					
Total Cyanide	-	19OCT05 0819 07		W15082	

AIC No. 94492-5	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Analyte					
Metals	17OCT05 1025 117	17OCT05 1511 117		S16869	

AIC No. 94492-6	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Analyte					
Metals	17OCT05 1025 117	17OCT05 1518 117		S16869	

AIC No. 94492-7	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Analyte					
Metals	17OCT05 1025 117	17OCT05 1318 117		S16869	
Mercury	17OCT05 1019 256	17OCT05 1339 256		S16868	

AIC No. 94492-8	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Analyte					
Metals	17OCT05 1025 117	17OCT05 1525 117		S16869	
Mercury	17OCT05 1019 256	17OCT05 1343 256		S16868	

AIC No. 94492-9	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Analyte					
Metals	17OCT05 1025 117	17OCT05 1532 117		S16869	
Mercury	17OCT05 1019 256	17OCT05 1346 256		S16868	

A-6 e

Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	104/100	85-115	4.40	20	W15007	
Cyanide	0.2 mg/l	98.5/95.5	85-115	3.09	20	W15082	
Total Recoverable Phenolics	0.146 mg/l	97.3/93.8	85-115	3.58	10	W14949	
Antimony	0.05 mg/l	99.0/97.2	85-115	1.90	20	S16869	
Arsenic	0.05 mg/l	93.7/91.6	85-115	2.23	20	S16869	
Beryllium	0.05 mg/l	95.7/93.9	85-115	1.85	20	S16869	
Cadmium	0.05 mg/l	102/101	85-115	0.963	20	S16869	
Chromium	0.05 mg/l	95.8/93.4	85-115	2.58	20	S16869	
Copper	0.05 mg/l	99.5/96.2	85-115	3.37	20	S16869	
Lead	0.05 mg/l	98.5/97.8	85-115	0.767	20	S16869	
Nickel	0.05 mg/l	96.0/93.6	85-115	2.56	20	S16869	
Selenium	0.05 mg/l	99.3/99.7	85-115	0.367	20	S16869	
Silver	0.02 mg/l	95.4/95.1	85-115	0.324	20	S16869	
Thallium	0.05 mg/l	108/107	85-115	0.106	20	S16869	
Zinc	0.05 mg/l	98.9/97.3	85-115	1.63	20	S16869	
Mercury	0.0025 mg/l	106/104	85-115	1.91	20	S16868	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	98.5/98.0	75-125	0.509	20	W15007	
Cyanide	0.2 mg/l	97.0/98.0	75-125	1.03	20	W15082	
Total Recoverable Phenolics	0.146 mg/l	97.3/98.6	80-120	1.40	10	W14949	
Antimony	0.05 mg/l	97.8/97.7	70-130	0.142	20	S16869	
Arsenic	0.05 mg/l	93.1/92.3	70-130	0.888	20	S16869	
Beryllium	0.05 mg/l	95.6/95.3	75-125	0.327	20	S16869	
Cadmium	0.05 mg/l	99.3/99.9	70-130	0.643	20	S16869	
Chromium	0.05 mg/l	92.9/93.1	70-130	0.208	20	S16869	
Copper	0.05 mg/l	96.2/95.9	70-130	0.273	20	S16869	
Lead	0.05 mg/l	97.5/96.6	70-130	0.943	20	S16869	
Nickel	0.05 mg/l	92.2/92.1	75-125	0.0871	20	S16869	
Selenium	0.05 mg/l	97.6/97.3	70-130	0.337	20	S16869	
Silver	0.02 mg/l	91.9/90.6	70-130	1.44	20	S16869	
Thallium	0.05 mg/l	106/104	70-130	1.76	20	S16869	
Zinc	0.05 mg/l	95.6/93.3	75-125	2.28	20	S16869	
Mercury	0.0025 mg/l	101/95.5	70-130	2.97	20	S16868	

A-6 f

Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	QC Sample	Qualifier
Cyanide	EPA 335.2	< 0.01	mg/l	0.01	W15007-8	
Cyanide	EPA 335.2	< 0.01	mg/l	0.01	W15082-1	
Total Recoverable Phenolics	EPA 420.1	< 0.005	mg/l	0.005	W14949-6	
Antimony	EPA 200.8	< 0.003	mg/l	0.003	S16869-1	
Arsenic	EPA 200.8	< 0.001	mg/l	0.001	S16869-1	
Beryllium	EPA 200.8	< 0.0003	mg/l	0.0003	S16869-1	
Cadmium	EPA 200.8	< 0.0001	mg/l	0.0001	S16869-1	
Chromium	EPA 200.8	< 0.001	mg/l	0.001	S16869-1	
Copper	EPA 200.8	< 0.001	mg/l	0.001	S16869-1	
Lead	EPA 200.8	< 0.001	mg/l	0.001	S16869-1	
Nickel	EPA 200.8	< 0.01	mg/l	0.01	S16869-1	
Nickel	EPA 200.8	< 0.001	mg/l	0.001	S16869-1	
Selenium	EPA 200.8	< 0.002	mg/l	0.002	S16869-1	
Silver	EPA 200.8	< 0.0002	mg/l	0.0002	S16869-1	
Thallium	EPA 200.8	< 0.001	mg/l	0.001	S16869-1	
Zinc	EPA 200.8	< 0.002	mg/l	0.002	S16869-1	
Mercury	EPA 245.2	< 0.0002	mg/l	0.0002	S16868-1	

A-62

Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

QUALITY CONTROL PREPARATION REPORT

LABORATORY CONTROL SAMPLES

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Cyanide	-		14OCT05 0658 07			W15007-3	
Cyanide	-		19OCT05 1201 07			W15007-9	
Cyanide	-		19OCT05 1209 07			W15082-2	
Cyanide	-		19OCT05 1209 07			W15082-3	
Total Recoverable Phenolics	-		10OCT05 1439 93			W14949-3	
Total Recoverable Phenolics	-		17OCT05 0911 93			W14949-7	
Metals	17OCT05 1025	117	17OCT05 1251	117		S16869-2	
Metals	17OCT05 1025	117	17OCT05 1258	117		S16869-3	
Mercury	17OCT05 1020	256	17OCT05 1257	256		S16868-2	
Mercury	17OCT05 1020	256	17OCT05 1300	256		S16868-3	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Cyanide	-		19OCT05 1201 07			W15007-6	
Cyanide	-		19OCT05 1201 07			W15007-7	
Cyanide	-		19OCT05 1436 07			W15082-4	
Cyanide	-		19OCT05 1436 07			W15082-5	
Total Recoverable Phenolics	-		10OCT05 1439 93			W14949-4	
Total Recoverable Phenolics	-		10OCT05 1439 93			W14949-5	
Metals	17OCT05 1025	117	17OCT05 1305	117		S16869-4	
Metals	17OCT05 1025	117	17OCT05 1312	117		S16869-5	
Mercury	17OCT05 1020	256	17OCT05 1304	256		S16868-4	
Mercury	17OCT05 1020	256	17OCT05 1308	256		S16868-5	

LABORATORY BLANKS

Analyte	Date/Time Prepared By		Date/Time Analyzed By		Dilution	QC Sample	Qualifier
Cyanide	-		19OCT05 1201 07			W15007-8	
Cyanide	-		19OCT05 1209 07			W15082-1	
Total Recoverable Phenolics	-		17OCT05 0911 93			W14949-6	
Metals	17OCT05 1025	117	17OCT05 1245	117		S16869-1	
Mercury	17OCT05 1020	256	17OCT05 1253	256		S16868-1	

A-6h



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE 1 OF 2

AIC Project (1204MONTHLY)

AIC No.	Sample Identification	Date/Time Collected	GRA B			WATER			NO OF BOTTLES	ANALYSES REQUESTED	Remarks	
			G	R	A	B	W	A				S
①	Effluent	1600 → 0800 101005 → 101105	X	X	X	X	X	2	T:CN (MDL=<0.005mg/l) Cd (Cadmium) Cr (Chromium) Cu (Copper) Pb (Lead) Zn (Zinc) Zn (Nickel) Zn (Silver) Zn (Zinc)	please use lower detection limits for metals (EPA 200.8)		
②	Influent	1001 → 0210 101005 → 101105	X	X	X	X	X	2	T:CN (MDL=<0.005mg/l) Cd (Cadmium) Cr (Chromium) Cu (Copper) Pb (Lead) Zn (Nickel) Zn (Silver) Zn (Zinc)			
③	SUP-004	101005/0955	X	X	X	X	X	1	T:CN (MDL=<0.005mg/l) Cd (Cadmium) Cr (Chromium) Cu (Copper) Pb (Lead) Zn (Nickel) Zn (Silver) Zn (Zinc)			
④	MTT-001	101205/0957	X	X	X	X	X	1	T:CN (MDL=<0.005mg/l) Cd (Cadmium) Cr (Chromium) Cu (Copper) Pb (Lead) Zn (Nickel) Zn (Silver) Zn (Zinc)			
⑤	SUP-005	0935 → 0932 101005 → 101105	X	X	X	X	X	1	T:CN (MDL=<0.005mg/l) Cd (Cadmium) Cr (Chromium) Cu (Copper) Pb (Lead) Zn (Nickel) Zn (Silver) Zn (Zinc)			
⑥	MTT-001	0957 → 0940 101205 → 101305	X	X	X	X	X	1	T:CN (MDL=<0.005mg/l) Cd (Cadmium) Cr (Chromium) Cu (Copper) Pb (Lead) Zn (Nickel) Zn (Silver) Zn (Zinc)			
Container Type			Preservative			NO = none			Field pH calibration on @			
G = Glass			P = Plastic			V = VOA vials			T = Sodium Thiosulfate			
NO = none			S = Sulfuric acid pH2			N = Nitric acid pH2			Z = Zinc acetate			
Turnaround Time Requested: (Please circle)			Relinquished			Relinquished			Received			
NORMAL or EXPEDITED IN _____ DAYS			By: <i>Paula...</i>			Date/Time: 10/30/1400			By: <i>Jimmy Pappas</i>			
Expedited results requested by: _____			By: _____			Date/Time: _____			Received in Lab: _____			
Who should AIC contact with questions: <u>Bruce</u>			Phone: (479)443-3292			Fax: (479)443-5613			Date/Time: 11/05/05			
Report Attention to: <u>Mrs. Donna McChristian</u>			Report Address to: 1400 North Fox Hunter Rd.			Fayetteville, AR 72701			Comments: Please use lower detection limits for metals EPA 200.8; and 0.005 mg/L for CN			
e-mail: <u>dmcchristian@arkansasUSA.com</u>			9/16/2004			FORM 0060						

A-61



LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

AIC Project: (1204MONTHLY)

PAGE 2 OF 3

Client: Operations Management International-Fayetteville		Credit Card		NO		ANALYSES REQUESTED		AIC CONTROL NO:	
Project Reference:		SAMPLE MATRIX		OF				84492	
Project # 4		WATER		BOTTLES				AIC PROPOSAL NO:	
Manager: Bruce Richard		S O I L						Carrier: Fed Ex	
Sampled By: Ops Staff		G R A B						Received Temperature C	
AIC Sample Identification		C O M P						1 C	
Date/Time Collected		X		1				Remarks	
0808 → 0552 101005 → 101105		X		1					
0808 → 0552 101005 → 101105		X		1					
1950 → 1807 100905 → 101005		X							
White River									
Mud Creek									
Influent									
Container Type									
Preservative									
G = Glass									
NO = none									
P = Plastic									
S = Sulfuric acid pH2									
V = VOA vials									
N = Nitric acid pH2									
H = HCl to pH2									
B = NaOH to pH12									
T = Sodium Thiosulfate									
Z = Zinc acetate									
Turnaround Time Requested: (Please circle)									
NORMAL or EXPEDITED IN _____ DAYS									
Expedited results requested by:									
Who should AIC contact with questions: Donna McChristian									
Phone: (479)443-3292									
Fax: (479)4435613									
Report Attention to: Donna McChristian									
Report Address to: 1400 North Fox Hunter Road									
Fayetteville, AR 72701									
e-mail: dmccchristian@arkansasUSA.com									
Relinquished									
By: <i>Donna McChristian</i>									
Date/Time: 10/30/05 11:40									
Received									
By: <i>Jimmy Day</i>									
Date/Time: 11/6/05 0950									
Comments:									

9/16/04

FORM 0060

A-6

Industrial Pretreatment Program Inspection Report - Long Form
City of Fayetteville

Date 12/22/05

Reported by Bruce Richart

A. Facility Description

Name Superior Industries International Contact Name Garnett Wise
 Location address 1901 Borick Drive, Fayetteville, AR 72701
 Mailing address 1901 Borick Drive, Fayetteville, AR 72701
 Principal product/service Aluminum Wheels - cast, coat, paint, & plate
 Permit No. FAY09 n/a SIC Code(s) 3365, 3398, 3471, 3714
 Categorical 433 Significant noncategorical Undetermined
 Operating schedule: Hours/day 24 Days/week 6 Weeks/year 50
 Shift schedule: 1st 7am-3pm 2nd 3pm-11pm 3rd 11pm-7am; Paint,
masking 6am-4pm 4pm-2am
 Scheduled plant shutdown periods 1 week in July & 1 wk in
December
 Plant activities during shutdown Maint, cleanup (1st 3 days),
pump out soap, deoxidizer tanks, & clarifiers
 Discharge schedule: Hours/day 24 Days/week 7 Weeks/year 52
 Employees per shift: 1st 930 2nd 300 3rd 300

B. Inspection DescriptionEntry time 09:00 hours Exit time 10:30 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
Bruce Richart / Lab Coordinator	OMI	443-3292
Garnett Wise/Environmental Manager	Superior Industries	443-7870x6331
Bill Koch / Environmental Technician	Superior Industries	

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

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, 6 days/week
 Discharge type: Continuous Batch Both
 Volume/frequency: Continuous -0- Batch -0-
 Sample location(s) receiving these wastewaters NA
 Comments No discharge from this process

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, 6 days/week
 Discharge type: Continuous Batch Both
 Volume/frequency: Continuous ~70,000 gpd Batch _____

Sample location(s) receiving these wastewaters SUP003
Comments Untreated at SUP003 except clarifier; SUP003 goes to SUP005.

Regulated process description Paint and clear coat
Federal category/subcategory 40 CFR 433 Metal Finishing
Average production (if production based limits) NA
Operating schedule 20 hrs/day, 6 days/week
Discharge type: Continuous Batch Both
Volume/frequency: Continuous 60,000 gpd Batch _____
Sample location(s) receiving these wastewaters SUP003
Comments Discharge volume is 50% paint processs and 50% clear coat process (Down 4 hrs for Maintenance)

Regulated process description Alodine
Federal category/subcategory 40 CFR 433 Metal Finishing
Average production (if production based limits) NA
Operating schedule 20 hrs/day, 6 days/week
Discharge type: Continuous Batch Both
Volume/frequency: Continuous _____ Batch 1,000 gpd, 5,000 gpd max
Sample location(s) receiving these wastewaters SUP006
Comments Alodine rinses to DI unit to reuse. 1/mo DI regeneration to holding tank. 1/mo rinse tank discharged to holding tank. Alodine tank discharged to holding tank 1/6 mo(9,000 gal over 3 weeks). Holding tank goes to clarifier.

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 -0-
Sample location(s) receiving these wastewaters NA
Comments 80,000 gal system is trucked out once every 2-5 years. Changed out July 04. A pilot study using a diatomaceous earth filter is being conducted to treat and recycle the water in the tank. The premelt wash tank is surrounded by a pit with a sump that pumps air compressor condensate and mop rinse water to SUP 003. It would be possible by tank failure, spill, or intentional means that the coolant could be pumped to SUP 003.

Regulated process description Chrome plating and Bright polish
Federal category/subcategory 40 CFR 433 Metal Finishing
Average production (if production based limits) NA
Operating schedule 20 hrs/day, 6 days/week

Discharge type: Continuous Batch Both
Volume/frequency: Continuous 400,000 - 500,000 gpd Batch _____
Sample location(s) receiving these wastewaters SUP006
Comments Cyanide from plating is treated and continuous discharge to SUP004, which goes to SUP006 then to SUP005 then to sewer. 24,000 gpd

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 _____
Flow measurement approved Verified during inspection
Flow meter calibrated Observed calibration Reviewed records
Collection methods approved Verified during inspection
Comments Re-piped 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 25,000 gpd, 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 discharges to SUP006. (SUP002 is solely domestic waste) Rest of domestic waste meets discharge from 003 near guard shack & continues to SUP 005.

Sample location no. SUP003 Verified during inspection Sampled
Description 3" Parshall flume, 20 yds from N. wall of clearcoat room
Estimated volume/description of:
Regulated flow 130,000 gpd, 7 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 SUP003 discharges to SUP005.

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.

Estimated volume/description of:

Regulated flow 24,000 gpd, 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 SUP004 discharges to SUP006. SUP004 is the sampling point for CN. Runs 20 hrs/day; down in wee hrs of A.M.

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 400,000-600,000 gpd, 6-7 days/week.

Unregulated flow _____

Dilutional flow 25,000 gpd, 6-7 days/week

Projected process flow in 5 years Goal of 25% less than now, reduction in chrome plating water.

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.

Sample location no. SUP006 Verified during inspection Sampled
Description 3" Parshall flume, 8 ft north of plating plant

Estimated volume/description of:

Regulated flow 300,000 to 500,000 gpd, 6-7 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 SUP004 discharges to SUP006 which 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, Lab 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.

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 (Wheel Plant metal hydroxide ppt was closed down and alodine waste is piped to the chrome plant for treatment) Chrome Plant - various pH adjustments, bisulfite chrome reduction, CN destruct, metal hydroxide ppt (lamellas), settling tanks, clarifiers.

Contributing processes Alodine & rinses, and all chrome plant waste except wheel plant deoxidizer rinses go straight to treatment; wheel plant deox and plating deoxidizer are pH adjusted & discharged to the clarifiers, Rampe (soap) waste is filter pressed and then goes directly to clarifier, and 2- & 4-stage washers rinse overflows go straight to the clarifier.

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? _____

Comments A nickel recovery ion exchange process has been added, it recovers 95% of the nickel in the plating rinse water, and thereby reduces sludge volume from the facility.

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: Pump out supernate to sewer. Rest is analyzed for metal then hauled by US Filter to the Waste Management 2 pines landfill in Louisiana. Approximately 35,000 2x/year each. Non-haz waste.

F006 chrome & nickel sludge to cu yrd bags to storage to Strong Environmental, 2 bags/day for recycling as haz waste.

Nickel filter pads, non-haz to 55 gal drums to storage to Agmet metals for recycle, 12 drums/week. Bright Nickel & semi-bright Ni: Filter press non-haz : 500 lbs 1x/yr. Nitric acid/phosphoric acid pumped to 4,000 g storage tank. pH adjusted & slowly discharged to sewer. (Used to be hauled.)

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 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 & coolant are drained to 5 gal buckets to 55 gal drums to non-haz storage and removed by US Filter to Conroy TX, 700 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 ZEP abd safety kleen parts cleaners go into the waste oil. The waste lab solvents are put in a fume hood and evaporated.

L. Accidental Spill and Discharge Control

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

Chemical storage areas	<input type="checkbox"/>	Verified <input checked="" type="checkbox"/>
Acid use areas	<input type="checkbox"/>	Verified <input checked="" type="checkbox"/>
Caustic use areas	<input type="checkbox"/>	Verified <input checked="" type="checkbox"/>
Raw materials storage areas	<input type="checkbox"/>	Verified <input checked="" type="checkbox"/>
Maintenance shop areas	<input type="checkbox"/>	Verified <input checked="" type="checkbox"/>
Paint application areas	<input type="checkbox"/>	<input type="checkbox"/> NA Verified <input checked="" type="checkbox"/>

Are there spill facilities? Where discharged to? Treatment then sewer

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 Contingency Plan and Emergency Response Plan. Small spills are vacuumed into a 55 gal drum then transported to the waste treatment area for testing and treatment.

M. Defined Pollutants

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

Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN, soaps, caustics, acids, polishing liquid, Phosphoric acid.

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

Same as above (all other materials must be pumped). Premelt bermed area can be pumped to clarifier at SUP003, but it never should be (coolant).

N. Close Out Interview

Attending Bruce Richart, Garnett Wise, Bill Koch.

Findings:	OK	Not OK	NA	Comments
Waste stream schematic(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Regulated process(es)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Sample location(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Self-monitoring program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Compliance schedule	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
Pretreatment system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Residuals management program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Waste oil management program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
STO management program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
ASPP procedures and postings	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Reporting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Certification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Notification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Other (Specify: _____)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

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 Storage tanks have been added to the paint product room to reduce chemical usage. The waste water treatment area was very clean and organized.

FILE COPY

Contingency Plan For Superior Industries International, Inc. Fayetteville Facility

Approved by

Signature

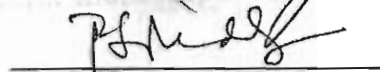
Date

VP of Facilities Engineering



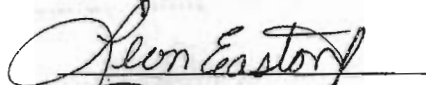
9/26/02

General Manager



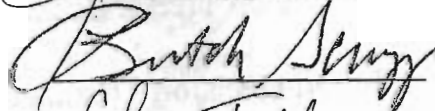
12/2/02

Wheel Plant Manager



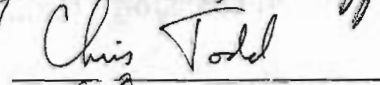
10/28/02

Plating Plant Manager



10/28/02

Safety Manager (Wheel)



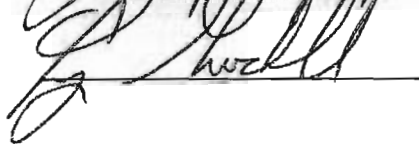
10/21/02

Safety Manager (Plating)



10/23/02

Human Resource Manager



10/5/02

Previous Revisions:

1. Rewritten: March 30, 1998
2. Revised: January 15, 2001
3. Revised: September 4, 2002

RECEIVED
SEP 16 2002

FACILITIES ENGINEERING
SUPERIOR INDUSTRIES

FILE COPY

Table of Contents

Emergency Telephone Numbers.....	Page 3
Figure 1 – Site Map.....	Page 3-1
I Introduction ..	Page 4
II Facility Layout.....	Page 4
III Emergencies Planned For..	Page 4 & 5
IV Environmental Response Team...	Page 5
V Emergency Response Equipment	Page 6
VI Emergency Procedures	Page 7
Figure 2 – Discharge Decision Tree ...	Page 7-1
Figure 3 – Potential Flood Decision Tree.....	Page 7-2
Figure 4 – Fire Decision Tree ...	Page 7-3
VII Reporting Obligations	Page 8
VIII Emergency Preparedness.....	Page 8 & 9
IX Communication with Local Authorities	Page 9
Appendix ‘A’ – Incident Commanders List ..	Page A-1
Appendix ‘B’ – 40 CFR 265.56 Emergency procedures For emergency coordinator	Page B-1
Appendix ‘C’ – Plant Evacuation Maps Casting Plant ..	Page C-1
Chrome Plant.....	Page C-2
Appendix ‘D’ – HAZMAT Responders.....	Page D-1
EMTs and First Responders.....	Page D-2

A-96

**Contingency Plan for
Superior Industries International Inc.
Fayetteville Facility
1901 Borick Drive
Fayetteville, AR 72701
EPA ID #: ARD 000 709 584**

Emergency Telephone Numbers:

Fayetteville Fire Department.
303 West Center Street
Fayetteville, AR 72701
Ph: (479) 442-3161

OMI
1500 N. Foxhunter Road
Fayetteville, AR 72701
Ph: (479) 443-3292
Atten: Denise Georgiou

State Emergency Phone
Ph: (479) 562-7444

National Response Center
Ph: (800) 424-8802

ChemTrec
Ph: (800) 424-9300

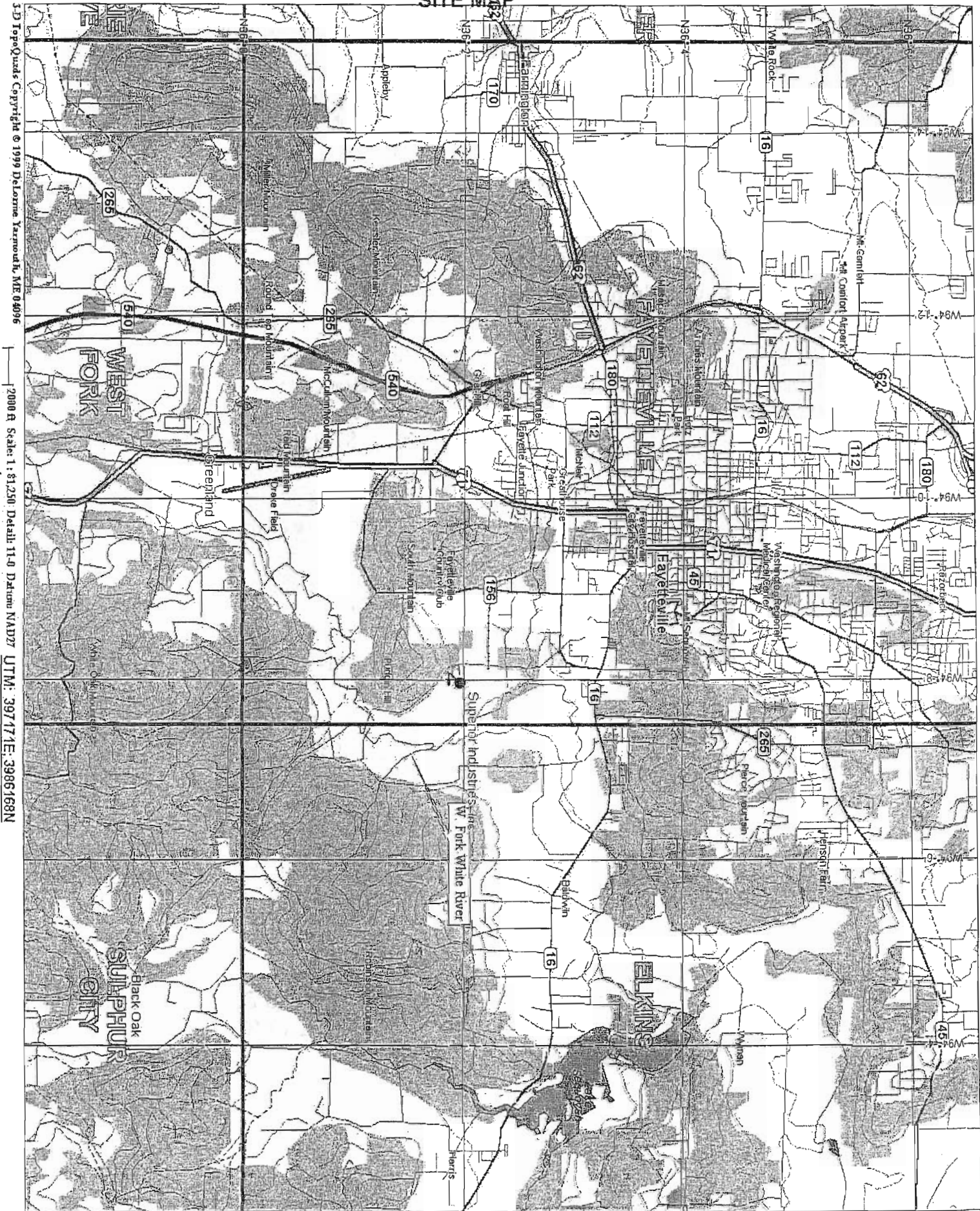
Fayetteville Police Dept.
100 West Rock Street
Fayetteville, AR 72701
Ph: (479) 587-3555

Bob Bracy, VP of Facilities Engr.
Superior Industries Int'l Inc.
1901 Borick Drive
Fayetteville, AR 72701
Work: (479) 443-7870
Home: (479) 925-7030
Cell: (479) 841-6083

Washington County Hazardous
Spill Response
Emergency # 911
(Relay Specific Information
for type & extent of spill)

COPIES OF THIS PLAN ARE ON FILE IN THE FACILITIES ENGINEERING
OFFICE AND IN THE LOCATIONS INDICATED IN FIGURE 1.

Superior Industries Int'l Inc.
SITE MAP



© 1999 DeLorme, Copyright © 1999 DeLorme, Yarmouth, ME 04096

2000 A Scale: 1:81,250 Detail: 1:4 Datum: NAD83 UTM: 39T 177E: 3986168N

Contingency Plan for Superior Industries International Inc.
Fayetteville Facility
1901 Borick Drive
Fayetteville, AR 72701
Telephone: (479) 443-7870

I INTRODUCTION:

Superior Industries Fayetteville facility manufactures and electroplates aluminum wheels for the automotive industry. This plant employs about 1250 people and operates 24 hours a day Monday through Friday and occasionally on Saturday.

This company is situated at 1901 Borick Drive on a dead end road. Arkansas Western Gas Company borders Superior on the west. Two paved loading zones and a parking lot are located on the north and east sides. An 8 foot, chain-link fence encompasses the east, south & west sides of the building.

Production processes at the Superior plant generate hazardous waste, F006, F019, D002, & D007.

II FACILITY LAYOUT:

All waste materials are stored in a designated area of the plating plant and the wheel plant. The facilities waste storage area typically contains from 0 to 40 bags in the plating plant and 0 to 10 drums in the wheel plant. Phones to access the paging system are located in the plating lab, offices, waste treatment office, and at other appropriate locations throughout the facility. Spill response & emergency equipment is stored in close proximity to the storage areas. Arrows on the site map indicate evacuation routes. The #1 signifies the primary route; the #2 signifies the secondary route. All chemicals stored are in compliance with all current fire code regulations.

III EMERGENCIES PLANNED FOR:

This plan is intended to deal with three basic types of emergencies.

FIRE: The hazardous wastes managed at this facility are not ignitable.

FLOOD: This facility is not located in a 100-year flood plain.

DISCHARGE: A spill could present a threat of exposure or contamination to facility personnel, while a large-scale discharge could result in the release of toxic constituents to the environment.

In the event of an emergency, the local fire and police departments are approximately 2½ miles & 4 minutes driving time. The hospital is located within 3½ miles, approximately 5 minutes driving time.

IV ENVIRONMENTAL REPOSE TEAM:

Training:

Employees assigned to perform Emergency Response operations are required to be trained in those actions and procedures necessary to provide required emergency response. This training shall include location and activation of process controls and other prevention techniques required to prevent the loss of life, reduce property damage, and protect the environment.

Standard operating procedures, protocol, and site specific training is provided to designate employees through certified 40 hour Haz-Mat training. Incident Commanders (see attached a list of employees in Appendix "A") coordinate personnel and resources to contain or prevent chemical releases into the environment during an emergency. Incident Commanders are the first level of supervision for incident operations. Incident Commanders are assigned based on the level or type of incident. If an Incident Commanders determines that the incident or emergency exceeds his level of authority, he must contact the next level of Incident Commanders.

Departmental supervision is required to establish standard shutdown procedures and provide such written documentation to the Safety Department and Department Managers.

Where employees are in need of supplemental training, the department managers and the safety department will provide training.

The names and phone numbers of those employees who are assigned specific tasks under the Emergency Response Plan are made readily available to Security personnel. Home phone numbers are to be held in confidence. Security is required to make the phone call if necessary.

Emergency Coordinator: -- to be contacted immediately in the event of an accident. This person will be responsible for notifying the appropriate emergency response authorities, directing emergency response procedures, and determining if a facility evacuation is necessary.

Mr. Bob Bracy

(479) 925-7030 (Home Phone) (479) 443-7870 (Plant Phone)

Alternate Emergency Coordinator: -- will assume all the responsibilities of the emergency coordinator when the primary coordinator is unable to perform his/her duties.

Mr. Chris Roddam:

(479) 267-5451 (Home Phone) (479) 443-7870 ex. 6286 (Plant Phone)

V **EMERGENCY RESPONSE EQUIPMENT:**

Superior maintains emergency response equipment, response plans, spill kits and first aid kits in the facility in the areas marked on the site map (see figure 1). This equipment includes the following:

1. Fire Prevention Equipment – stored on walls
 - 150 ABC fire extinguishers

2. Protective Equipment – stored in the:
 - a) 55-gallon overpack located in both hazardous waste storage areas in the wheel & plating plants. PPE includes gloves, boots, apron, goggles, & respirators.
 - b) A crash cart for major incidents. Emergency response PPE includes SCBA & confined space equipment.
 - c) Tool cribs in both the wheel plant & plating plant retain the following equipment: rubber gloves, rubber boots, full face shields, combination organic vapor/acid gas respirators, poly-laminated tyvek suits, impervious aprons, and spill absorbent materials for collection of spilled material. In addition to the above material, empty containment drums, hand pumps, air pumps, brooms, scoops, and shovels are made available at the Tool Cribs. Also stored are neutralizers for acids and bases.

3. Health/Safety Equipment
 - Eye Washes
 - Showers

4. Communication Equipment
 - Intercom System

In the event that employees are required to evacuate, the following procedures are to be used:

- 1) The paging system will be used to signal employees of the necessity to evacuate. Security will give three short blasts on the paging system and announce the

evacuation, i.e. "ATTENTION, ATTENTION, ATTENTION, EMPLOYEES ARE REQUIRED TO EVACUATE THE FACILITY" or in cases where only a portion of the facility is required to evacuate, evacuation will be announced for those areas.

- 2) When the evacuation announcement has been sounded, employees are required to turn off machines, perform assigned emergency shutdown procedures, and proceed to the nearest exit (primary exit where possible) or use a secondary exit (where necessary). The primary exit for all departments is the main employee entrance. Secondary exits are marked on the Emergency Evacuation Plan.
- 3) Employees are required to assemble in the designated area, by department, to be accounted for by the department supervisor. Employees are to remain in the designated assembly area until management allows entry into the plant.

VI EMERGENCY PROCEDURES:

All employees who handle, or are potentially exposed to hazardous material/waste receive general emergency response training. Workers who handle hazardous waste receive annual RCRA training (outside qualified sources may be utilized for training) at which time specific responsibilities under the contingency code are discussed.

Figure 2, 3, and 4 are "decision trees", which illustrate the general procedures that workers and the Incident Commander should follow in the event of a spill, and general procedures that workers of the Emergency Coordinator should follow in the event of a fire or flood.

A-8h

Figure 2

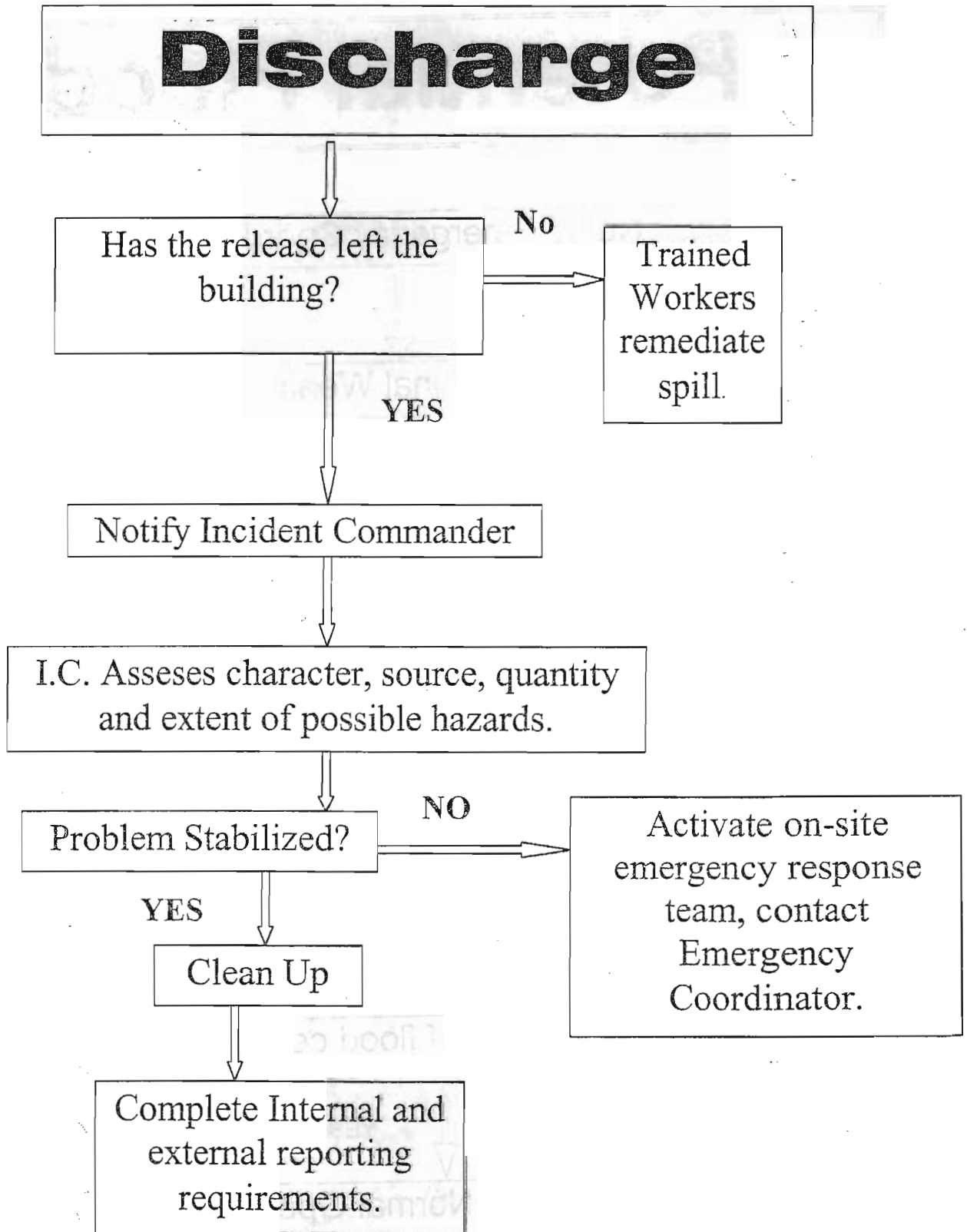


Figure 3

Potential Flood

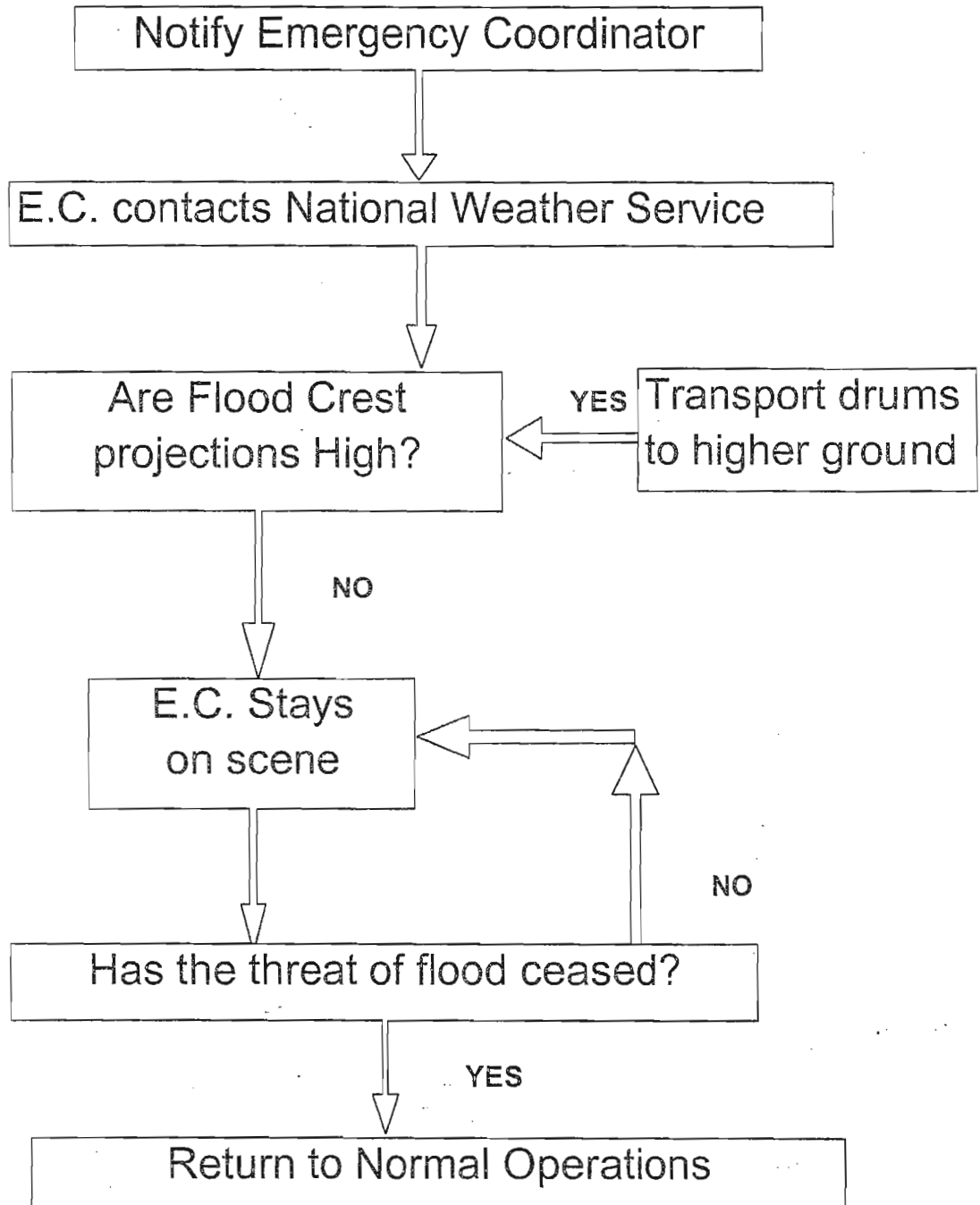
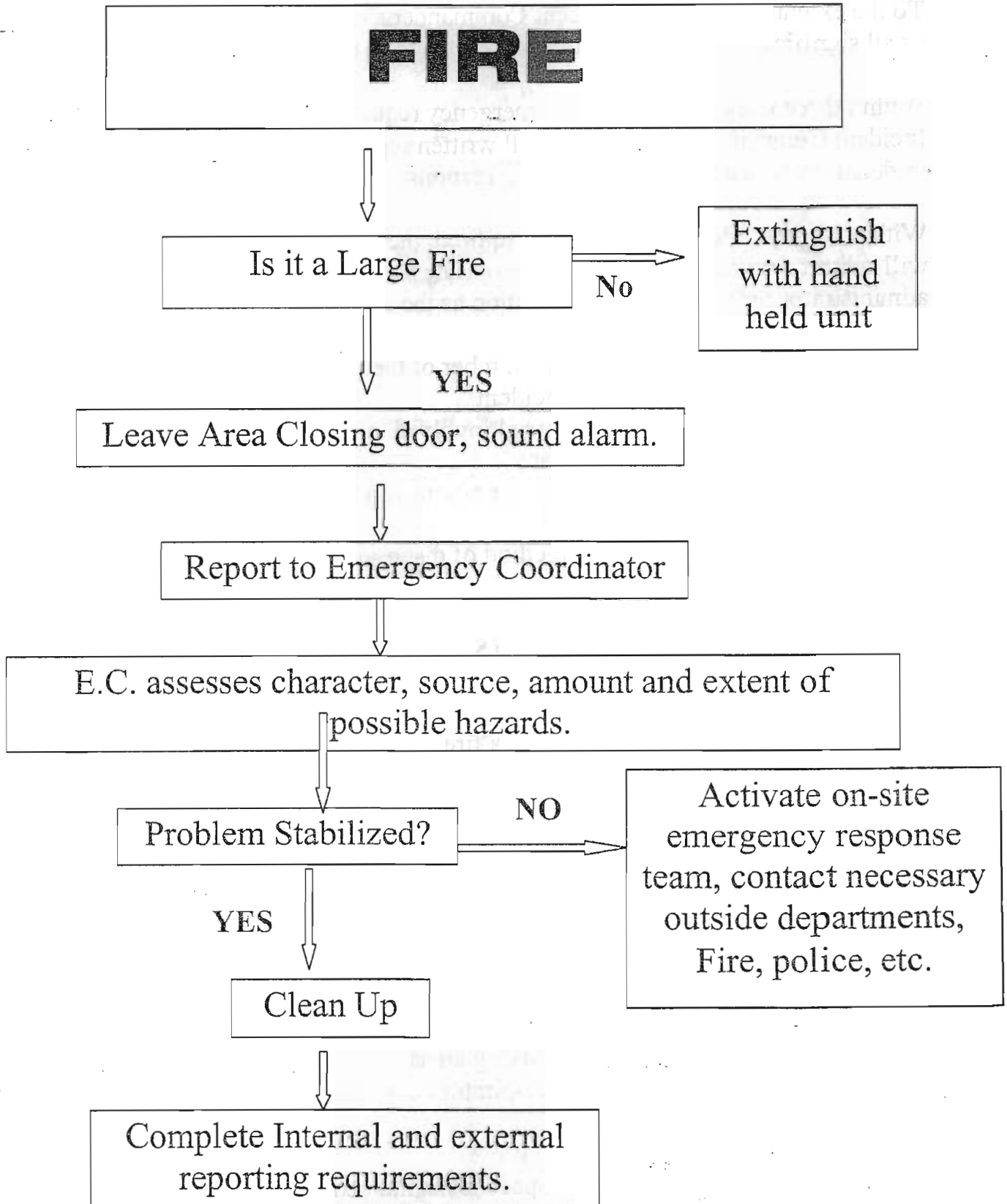


Figure 4



VII REPORTING OBLIGATIONS:

To the extent possible, the Incident Commander shall make a contemporaneous record of all significant events and of the actions taken in response.

Within three working days of any emergency requiring implementation of this plan, the Incident Commander shall make a full written report to Superior describing the incident in detail, as well as all actions taken in response.

Within 15 days after the incident, if required, the Emergency Coordinator, Bob Bracy will submit a written report to the appropriate state agency and the regional administrator providing such information as the following:

- ❖ Name, address, and phone number of the facility and the owner/operator.
- ❖ Date, time, and type of incident.
- ❖ Type and quantity of material involved in the accident.
- ❖ The extent of injuries, if any.
- ❖ An assessment of the actual or potential hazard to human health or the environment, if applicable.
- ❖ Estimated quantity and method of disposal of wastes resulting from the incident.

VIII EMERGENCY PREPAREDNESS:

Emergency preparedness inspections are standard operating procedures at Superior. Inspections minimize the possibility of a fire, explosion, or flood, and provide assurance that emergency response equipment will be operational at the time of an accident. The following inspections will be performed on a routine basis.

Daily:

1. Check access clearance to fire exits
2. Check storage room:
 - Are bungs tight on drums?
 - Are grounds attached?
 - Any spills?
3. Check proper use of no-smoking areas
4. Check eye protection and respiratory devices for general cleanliness
5. Check ventilation system
6. Check monitoring equipment
7. Check that adequate aisle space is maintained

Weekly:

1. Check sprinkler clearance

A-82

2. Check drum storage:
Rust?
Dents?
Safe stacking?
3. Are all container locked?
4. Check supply of absorbents
5. Check alarm/communication system
6. Check hazardous waste labels
7. Weekly Hazardous Waste Inspection Reports
8. Weekly Waste Inventory Report

Monthly:

1. Check condition of eye wash stations
2. Check posting signs, and no-smoking signs
3. Check fire extinguishers
4. Test fire alarm
5. Check respirators
6. Check spill control and decontamination equipment

Semi-annually:

1. Check generators, boilers, furnaces
2. Review emergency response procedures with emergency response team

Annually:

1. Facility audit
2. RCRA training
3. Fire Drill

IX COMMUNICATION WITH LOCAL AUTHORITIES:

Superior has made every effort to inform local fire, police, and medical authorities of the potential hazardous materials that exist at the facility and of the existence of a facilities contingency plan.

The local fire department visits Superior's facility annually. All three shifts (that may respond to our facility) have conducted a walk through of our facility.

The company physician conducts an annual walk through within our facility.

Superior has also made every effort to make arrangements with state emergency response agencies by sending copies of the contingency plan to the appropriate officials.

State and local agencies are immediately appraised of any amendments to the contingency plan. Certified letters documenting communication with these agencies are available.

A-82



Superior Industries International, Inc.

Appendix "A"

INCIDENT COMMANDERS LISTING (for Chemical Spill Response)

LEVEL 4 INCIDENT COMMANDERS

First Line Supervisors:

Department Supervisors, Foremen, Team Leaders

LEVEL 3 INCIDENT COMMANDERS

Department Supervisors
Safety Officers

LEVEL 2 INCIDENT COMMANDERS

Safety Officers
Maintenance Managers

LEVEL 1 INCIDENT COMMANDERS

Environmental Engineer
General Manager
Vice-President, Facilities Engineering

A-80

INCIDENT DEFINITIONS

The determination of the type of incident which has occurred will be made by the Incident Commander.

LEVEL 4 INCIDENT

INCIDENTAL SPILLS, CONTAINED WITHIN THE BUILDING, WHICH CAN BE CLEANED UP BY ONE OR TWO DEPARTMENT PERSONNEL.

MINOR INJURIES REQUIRING MINIMAL FIRST AID.
INCIDENT AND CORRECTIVE ACTION TAKES A SHORT AMOUNT OF TIME.

- VERBAL NOTIFICATION TO DEPARTMENT SUPERVISOR
- VERBAL (OR WRITTEN) NOTIFICATION OF ENVIRONMENTAL ENGINEERING DEPARTMENT MAY BE GIVEN BY OR AT THE DIRECTION DEPARTMENT SUPERVISOR.

LEVEL 3 INCIDENT

A SPILL, CONTAINED WITHIN THE BUILDING, WHICH REQUIRES MORE THAN TWO OR MORE DEPARTMENT PERSONNEL TO CLEAN UP.

MINOR EQUIPMENT FIRE

MINOR INJURIES REQUIRING TREATMENT BY EMT. INJURY COULD RESULT IN LOST TIME.
INCIDENT AND CORRECTIVE ACTION IS COMPLETE IN LESS THAN 8 HOURS.

- VERBAL NOTIFICATION OF SECURITY TO ENTER IN Spill Log.
- TELL SECURITY TO NOTIFY THE FOLLOWING (IN THE SAME ORDER):
 - SAFETY OFFICER
 - PLANT MANAGER
 - ENVIRONMENTAL ENGINEER
 - MAINTENANCE MANAGER
- WRITTEN NOTIFICATION WILL BE FORWARDED THROUGH SAFETY AND THE PLANT MANAGEMENT TO THE ENVIRONMENTAL ENGINEER.

LEVEL 2 INCIDENT

ANY SPILL WHICH, ALTHOUGH CONTAINED WITHIN THE BUILDING, THAT REQUIRES THE RESOURCES OF MORE THAN ONE DEPT OR OF THE A HAZ-MAT RESPONSE TEAM IN ORDER TO COMPLETE THE CLEAN UP, AND/OR REQUIRES THE USE OF THE HAZARDOUS RESPONSE "CRASH CART";

ANY SPILL OR ACCIDENT WHICH REQUIRES THE EVACUATION OF A SIGNIFICANT AREA OF THE PLANT.

ANY INJURY THAT REQUIRES TREATMENT BY AN EMT AND TRANSPORT BY AMBULANCE TO THE LOCAL EMERGENCY ROOM

ANY INCIDENT THAT TAKES MORE THAN 8 HOURS TO RESOLVE

- VERBAL NOTIFICATION OF SECURITY TO ENTER IN Spill Log.
- TELL SECURITY TO NOTIFY THE FOLLOWING (IN THE SAME ORDER):
 - SAFETY OFFICER
 - PLANT MANAGER
 - GENERAL MANAGER
 - VICE PRESIDENT, FACILITIES ENGINEERING
 - ENVIRONMENTAL ENGINEER
 - MAINTENANCE MANAGER
- WRITTEN EXPLANATION OF EVENTS WILL BE REQUIRED FROM THE INCIDENT COMMANDER AND DEPARTMENT SUPERVISOR WITHIN 3 WORKING DAYS FOLLOWING INCIDENT WILL BE FORWARDED THROUGH MANAGEMENT TO THE EMERGENCY COORDINATOR OR HIS ALTERNATE.

LEVEL 1 INCIDENT

ANY SPILL NOT CONTAINED WITHIN THE BUILDING; OR REQUIRES OUTSIDE EMERGENCY RESPONSE TEAMS TO CONTAIN.

ANY SPILL OR ACCIDENT WHICH REQUIRES THE EVACUATION OF THE ENTIRE PLANT.

SEVERE INJURIES TO MORE THAN ONE OR TWO PERSONNEL. THAT REQUIRES TREATMENT BY AN EMT AND TRANSPORT BY AMBULANCE TO THE LOCAL EMERGENCY ROOM

A NATURAL OR MAN-MADE DISASTER THAT DAMAGES OR COULD POTENTIAL DAMAGE THE PLANT OPERATIONS. (Major Fire, Flood, Tornado)

ANY INCIDENT THAT TAKES MORE THAN 24 HOURS TO RESOLVE OR REQUIRES THE ASSISTANCE OF GOVERNMENT AGENCIES.

- VERBAL NOTIFICATION OF SECURITY TO ENTER IN Spill Log.
- TELL SECURITY TO NOTIFY THE FOLLOWING (IN THE SAME ORDER):
 - SAFETY OFFICER
 - PLANT MANAGER
 - GENERAL MANAGER
 - VICE PRESIDENT, FACILITIES ENGINEERING
 - ENVIRONMENTAL ENGINEER
 - MAINTENANCE MANAGER
- WRITTEN EXPLANATION OF EVENTS WILL BE REQUIRED FROM THE INCIDENT COMMANDER AND DEPARTMENT SUPERVISOR WITHIN 3 WORKING DAYS FOLLOWING INCIDENT WILL BE FORWARDED DIRECTLY TO THE EMERGENCY COORDINATOR OR HIS ALTERNATE.

§ 265.54

- (a) Maintained at the facility; and
- (b) Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

[45 FR 33232, May 19, 1980, as amended at 50 FR 4514, Jan. 31, 1985]

§ 265.54 Amendment of contingency plan.

The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

- (a) Applicable regulations are revised;
- (b) The plan fails in an emergency;
- (c) The facility changes—in its design, construction, operation, maintenance, or other circumstances—in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- (d) The list of emergency coordinators changes; or
- (e) The list of emergency equipment changes.

[45 FR 33232, May 19, 1980, as amended at 50 FR 4514, Jan. 31, 1985]

§ 265.55 Emergency coordinator.

At all times, there must be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person must have the authority to commit the resources needed to carry out the contingency plan.

[Comment: The emergency coordinator's responsibilities are more fully spelled out in § 265.56. Applicable responsibilities for the emergency coordinator vary, depending on factors such as type and variety of waste(s) handled by the facility, and type and complexity of the facility.]

40 CFR Ch. I (7-1-99 Edition)

§ 265.56 Emergency procedures.

- (a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately:

- (1) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

- (2) Notify appropriate State or local agencies with designated response roles if their help is needed.

- (b) Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and a real extent of any released materials. He may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.

- (c) Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

- (d) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows:

- (1) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and

- (2) He must immediately notify either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under part 1510 of this title), or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:

- (i) Name and telephone number of reporter;
- (ii) Name and address of facility;

(iii) Time and type of incident (e.g., release, fire);

(iv) Name and quantity of material(s) involved, to the extent known;

(v) The extent of injuries, if any; and

(vi) The possible hazards to human health, or the environment, outside the facility.

(e) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

(f) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(g) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

[Comment: Unless the owner or operator can demonstrate, in accordance with §261.3(c) or (d) of this chapter, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of parts 262, 263, and 265 of this chapter.]

(h) The emergency coordinator must ensure that, in the affected area(s) of the facility:

(1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and

(2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

(i) The owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that the facility is in compliance with paragraph (h) of this section before operations are resumed in the affected area(s) of the facility.

(j) The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:

(1) Name, address, and telephone number of the owner or operator;

(2) Name, address, and telephone number of the facility;

(3) Date, time, and type of incident (e.g., fire, explosion);

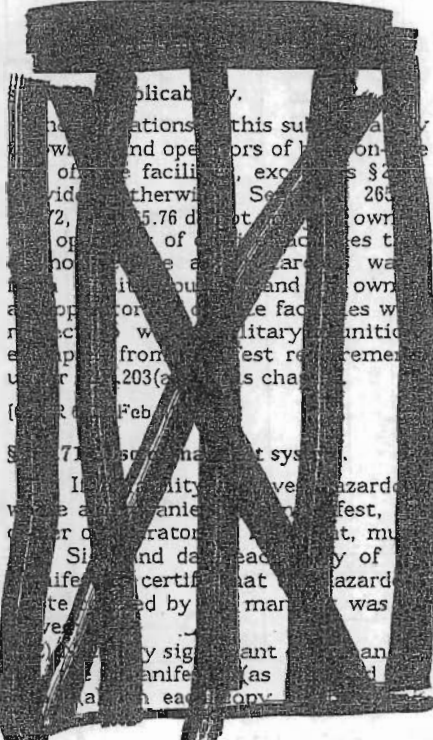
(4) Name and quantity of material(s) involved;

(5) The extent of injuries, if any;

(6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(7) Estimated quantity and disposition of recovered material that resulted from the incident.

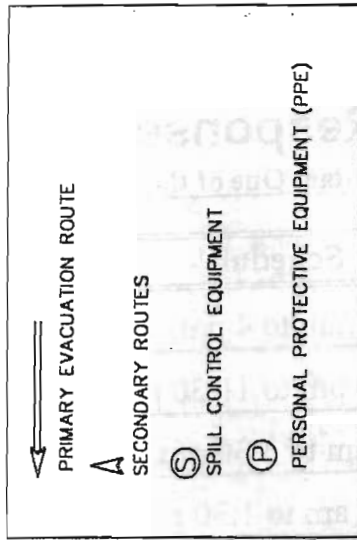
[45 FR 33232, May 19, 1980, as amended at 50 FR 4514, Jan. 31, 1985]



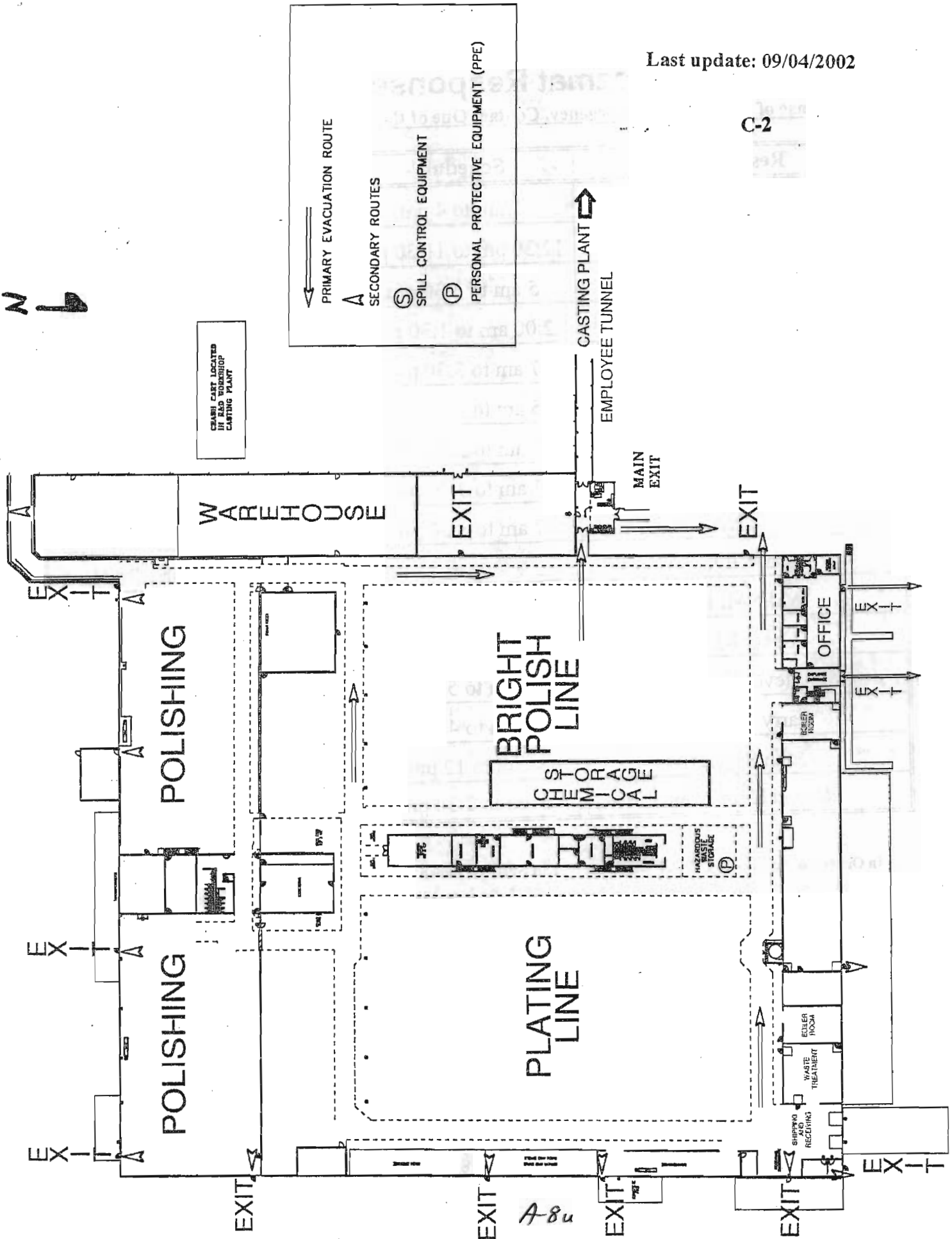
PLATING PLANT EVACUATION ROUTE

Last update: 09/04/2002

C-2



CRASH CART LOCATED IN R&D WORKSHOP CASTING PLANT



A-8u

Hazmat Response Team

In Case of a HAZMAT Emergency, Contact One of the Following HAZMAT Responders:

Responder	Schedule	Department	Supervisor
Chris Todd	7 am to 4 pm	56	Larry Goodall
Brad Alvarez	12:30 pm to 11:30 pm	18	Joannie Kirk
Joyce Reiner	5 am to 3:30 pm	18	John Beasley
Bobby Stilwell	2:00 am to 1:30 pm	18	John Beasley
Mike Hutchens	7 am to 3:30 pm	78	John Adams
Jerry Dyke	5 am to 3:30 pm	18	John Beasley
Rhonda Taylor	5 am to 3:30 pm	18	John Beasley
Moe Mandrell	7 am to 3:30 pm	49	Allen Sloan
Scottie Hudson	7 am to 3:30 pm	78	John Adams
Jesse Williams		78	Chris Roddam
Mike Miller	8 am to 5 pm	57	Buddy Hawkins
Oscar Rice		318	Willie Jennings
Steve White	8 am to 5 pm	360	Butch Scruggs
Larry Massey	7 am to 4 pm	356	Larry Goodall
John Snyder	4 am to 12 pm	333	Lynn Pate
Roland Hohnerlein	5 am to 2:30 pm	349	David Sauls

In Order To Page the HAZMAT Responders, You Need To Punch (*62 for the Cast plant, * 63 for Chrome plant, *61 for Administration) On The Telephone And Announce Over The Paging System .

In Case of a Medical Emergency, Contact One of the Following EMT's / First Responders:

Name of EMT / First Reponder	Schedule	Dept/Supervisor	Location
Ken Bohannon	Various	Mold Shop / Preston Lougee	Mold Shop
Chris Todd	8 am to 5 pm	Safety / Larry Goodall	Safety Office
Colin Olson	6AM to 4:30PM	Machine Shop / Bob McCarn	Machine Shop
Maurice Colpitts	8AM to 5PM	Engineering / Gary Baldridge	Front Office
Donna Crawford	Various	Fluoroscope / Sam Samavati	Fluoroscope
Matt Akin	4:30 pm to 3 am	Packline / Prentice Meredith	Quality
Alan Christman	7 am to 4 pm	Mold Shop / Preston Lougee	Mold Shop
Charles Scheille	6 am to 4:30 pm	Packline / Prentice Meredith	Quality
Will Barton	5 am to 3 pm	Safety Office / Leon Easton	Administration
Jorge Martinez	7 am to 4 pm	Lot Development / Todd McGee	Lot Development
Jeff West	4:30 pm to 11 pm	Lot Development / Todd McGee	Lot Development
Patti Perez	8 am to 4pm	Human Resources / Lance Gaston	Human Resources
Ken Terry	11 pm to 7 am	Fettling / Robbie Sikes	Foundry

EMT / First Responders for Chrome

Saul Sosa	6 am to 4:30 pm	Administration / Butch Scruggs	Polishing
Brian Sotorske	7am to 3:30 pm	Maintenance / Don Nickell	Maintenance
Roland Hohnerlein	5 AM to 1:30 PM	Maintenance / Don Nickell	Maintenance
Mark Pennington	6 am to 2:30 pm	Packline / J.R. Cline	Packline
Ray Howell	6 am to 6:30 pm	Sol. Maintenance / Pete Brown	Solution Maintenance
Jose Montano	5 AM to 5 PM	Polishing / Isaias Sosa	Polishing
Joseph Jerabeck	2 pm to 10:30 pm	Waste Treatment/Steve White	Waste Treatment
Freddi Valle	Rotates Shifts	Polishing / Isaias Sosa	Polishing
David Sauls	8AM to 5PM	Maintenance / Butch Scruggs	Maintenance

In Order To Page One Of The EMT's, You Need To Punch (*62 for the Cast plant, * 63 for Chrome plant, *61 for Administration) On The Telephone And Announce Over The Paging System "The EMT On Duty To Respond To (Give Your Location)"

**Also, For Emergency Medical Services, You Need To Contact Security AT EXT. 1200
To Contact An Ambulance Or The Fire Department.
In Case You Need Further Assistance, First Care Family Doctors South Telephone # (479) 442-2822**

Attachment A 9

FILE COPY



SUPERIOR INDUSTRIES INTERNATIONAL, INC.

1901 BORICK DRIVE • FAYETTEVILLE, AR 72701
(479) 443-7870 • FAX (479) 443-4522

By Certified Mail: 7002 2030 0000 8731 1374, Return Receipt Requested

July 20, 2006

Denise Georgiou
Industrial Pretreatment Coordinator
Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

Re: Wastewater Discharge Permit #FAY09
Notification of Superior Plating Line Decommission

Dear Denise,

This letter is the formal notification to follow-up our telephone conversations of the past several weeks, regarding the upcoming permanent shutdown of Superior's Fayetteville chrome plating operation. As you'll recall, my first telephone notification to you was on 6/16/06 when the public press release went out to the media.

As we discussed in our meeting at the Chrome Plant on 7/18/06 with you, Lynn Pate, and myself, the final day of electroplating and painting production is scheduled for Friday 7/28/06. Casting-related operations will not be affected, and the bright polish and clearcoating operations will also continue.

The plating plant waste treatment operation will continue operating 24 hours/day, and will be utilized to treat spent solutions over the next 2-3 weeks after production ends. The Chrome Lab will also continue operating as needed during this decommissioning process. The solutions to be treated are the same as are routinely/periodically treated on weekends. All internal process control, discharge monitoring, and reporting, as required by our permit will continue. Certain other plating solutions will be shipped off-site in bulk for reuse, recycling or treatment.

After all solutions have been treated or shipped off, the decommissioning process of pressure washing and cleaning associated tanks, filters, pumps, piping, structure/floors/secondary containment, etc., will continue for some time. During that time the plating-related equipment will be removed and sold, scrapped or disposed of as appropriate. This relatively low volume of wastewater will also be waste-treated and discharged, probably for several months. The waste treatment system itself will be the last thing to go.

Fax PDF 21-JUL-06
Data Entry _____ NOV _____

FILE COPY

A copy of the spreadsheet we provided you at our last meeting is attached. It shows the actual water usage and discharge flow for the previous 6 months, and projects the estimated wastewater discharge flow after the plating operation is shut down. We project a reduction in wastewater discharge of over 6,000,000 gallons/month.

As a result of the removal of the plating operation, Superior projects greatly reduced levels of nickel, copper, chromium, cyanide, and less phosphorus in our wastewater.

If you have any questions or need more information, please contact me at 443-7870 x6331 or gwise@supind.com, or Lynn Pate at 443-7870 x4842 or lpate@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
Environmental Manager

Attachment

Attachment A-10

Denise Georgiou

FILE COPY

From: "Garnett Wise" <gwise@supind.com>
To: "Denise Georgiou" <dgeorgiou@arkansasusa.com>
Cc: "Butch Scruggs" <bscruggs@supind.com>; "Lynn Pate" <LPate@supind.com>; "Steve White" <swhite@supind.com>; "PS Reddy" <psreddy@supind.com>; "Tim Barry" <tbarry@supind.com>
Sent: Thursday, May 18, 2006 3:57 PM
Subject: Permit #FAY09, follow-up to 24-hour reports

Denise,

This e-mail is to follow up on the 24-hour report I made to you by telephone yesterday afternoon, as required by permit. Based on certified lab results received from ESC Labs, a brief summary of the issues follows:

- The monthly average pound/day of Chromium was exceeded for the month of April.
- The pound/day permit limits for Chromium, Copper and Nickel were exceeded on May 3rd.
- The pound/day permit limits for Chromium, Copper and Nickel were exceeded on May 4th.

In each of these occurrences, the daily concentrations and monthly average concentrations were within permit limits. Through the process of investigating possible root causes, we now question the accuracy of the high discharge flowmeter readings, and believe there is a possibility that the readings may have been artificially elevated due to a partial blockage. Roto-Rooter is scheduled to clean the piping adjacent to the SUP005 flume tomorrow. We will review the water level in the flume before and after this procedure, relative to production and water usage, to determine what affect this has.

Meanwhile, our internal lab analyses were reviewed and split samples were retested for May 3 & 4, indicating that ESC's concentration results were higher than expected. We have asked ESC to re-run their own split samples to verify their results.

Our review of the situation is ongoing, and I'll provide more information as it becomes available. Please feel free to contact me if I can provide any additional information.

Garnett Wise
Environmental Manager
Superior Industries Int'l Inc. - Fayetteville, AR
443-7870 x6331

Superior's EMS Policy is the "Circle of Commitment": Compliance → Continuous Improvement → Pollution Prevention

5/18/2006



SUPERIOR INDUSTRIES INTERNATIONAL, INC.

1901 BORICK DRIVE • FAYETTEVILLE, AR 72701
(479) 443-7870 • FAX (479) 443-4522

Certified Mail Return Receipt: 7002 2030 0000 8728 9093

May 19, 2006

Denise Georgiou
Industrial Pretreatment Coordinator
Operations Management International, Inc.
1400 North Fox Hunter Road
Fayetteville, AR 72701

Re: April 2006 DMR Report

Dear Denise,

Please find enclosed the monthly discharge report for the month of April 2006. Superior had no mg/l limit exceedence, however one lbs/day limit exceedence of chromium at 1.3348 lb/day which is .0728 lb/day over the permit limits. This also put our monthly average at .7001 lb/day, which is .0141 lb/day over the permit average limit. Since the concentrations were within permit limits, we are monitoring our discharge flow rate and have scheduled Roto-Rooter to clean out the pipe downstream again. We will evaluate if the discharge rates have been artificially elevated due to obstructions in the pipe. If you have any questions, please feel free to call me at 443-7870 and/or fax me at 442-4219.

TTO Certification for the month of April 2006.

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 the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority.

Garnett Wise
Environmental Manager

*20-May-06 permit wise/sup
called to say Roto Rooter cleaned
their pipes and the difference
in flow is not significant
in 4% lower, so no
change in their
results. - JS*

A-106

Fax
Deliver
Postmark
19-MAY-06 Data Entry

NOV 27 2006

1 Daily Cr 16.7
1 Monthly avg Cr 16.7

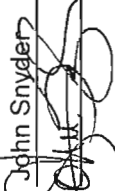


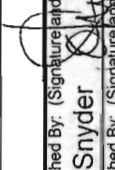
Environmental Services Company, Inc.
 Corporate Office
 13715 West Markham P.O. Box 55146
 Little Rock, AR 72211 Little Rock, AR 72215
 website: www.esclabs.com

Environmental Services Company, Inc.
 Northwest Branch
 1107 Century
 Springdale, AR 72764

Phone: 501-221-2565 Fax: 501-221-1341

Phone 501-750-1170 Fax: 501-750-1172

CHAIN OF CUSTODY

Client Information				Project Information				Requested Parameters					
Company Name: Superior Industries				Permit/Project #: Fayetteville Plating Plant									
Address: 1901 Borick Dr. Building #2				Purchase Order #: 706082									
Fayetteville Ar 72701													
Telephone: (479) 443-7870 ext. 842				Sampler Name(s): John Snyder									
FAX: (479) 443-6652				and Signature(s): 									
ESC Client Number: 1429													
Sample Identification		Sample Collection		Sample Containers									
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#				
Outfall 004	0604020198	4/10/2006	9:00	G	Water	Plastic	1 qt.	*NaOH, pH > 12	1	X			
Outfall 004	0604020199	4/11/2006	9:00	G	Water	Plastic	1 qt.	*NaOH, pH > 12	1	X			
Outfall 004	0604020200	4/12/2006	9:00	G	Water	Plastic	1 qt.	*NaOH, pH > 12	1	X			
Total Cyanide													
Relinquished By: (Signature and Printed Name) John Snyder 				Received By: (Signature and Printed Name) Sam Isaacs 				Date: 4/17/2006		Time: 11:50		Custody Seals: Used? <input checked="" type="checkbox"/> Intact? <input type="checkbox"/>	
Relinquished By: (Signature and Printed Name) Sam Isaacs 				Received By: (Signature and Printed Name) Alice Anne Alice Anne				Date: 4/17/2006		Time: 19:20		Turnaround: Regular <input checked="" type="checkbox"/> Special <input type="checkbox"/>	
Relinquished By: (Signature and Printed Name)				Received for Lab By: (Signature and Printed Name)				Date: 4/17/2006		Time: 19:20		Were samples properly preserved: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments:													
* Ascorbic Acid added to remove residual chlorine													
FLOW DATA													
pH: _____													
Temp.: _____ °C _____ °F													
DO: _____													
HS: _____													
Chlorinated? Yes No													
Cool all samples to 4 degrees C.													
F:\Users\Plating\Chomship\Shipping\Coc_004													
This Document is Page 1 of 1													

A-10d

Environmental Services Company, Inc.

Corporate Office
 13715 West Markham
 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (501)750-1170 Fax (501)750-1172

Control Number: 0604020198
 Customer Name: SUPERIOR INDUSTRIES INTL INC
 Customer Number: 1429
 Report Date: 04/24/06

Sample Date: 04/10/06
 Sample Time: 0900
 Sample Type: GRAB
 Sample From: OUTFALL 004

Collected By: J. SNYDER
 Delivery By: SJI
 Work Order:
 Purchase Order:

Laboratory Analysis

Analysis	Parameter	Result	Notes	Quantity	Method	Quality Assurance
Date: 04/24 0900 ARH	Cyanide Total (as CN)	0.1150 mg/L			EPA 335.2	Precision % RPD: 0.00
						Accuracy % Recovery: 80.8 *

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Richard Brown
 Environmental Services Co., Inc.

Environmental Services Company, Inc.

Corporate Office
 13715 West Markham
 Little Rock, AR 72211
 Tel. (501) 221-2565 Fax (501) 221-1341

Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (501) 750-1170 Fax (501) 750-1172

Control Number: 0604020199
 Customer Name : SUPERIOR INDUSTRIES INTL INC
 Customer Number : 1429
 Report Date : 04/24/06

Sample Date : 04/11/06
 Sample Time : 0900
 Sample Type : GRAB
 Sample From : OUTFALL 004

Collected By: J.SNYDER
 Delivery By : SJI
 Work Order :
 Purchase Order :

Analysis		Laboratory Analysis		Quality Assurance					
Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision	Accuracy
								% RPD	% Recovery
04/24	0900	ARH	Cyanide Total (as CN)	0.1439	mg/L		EPA 335.2	0.00	80.8 *

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Richard Brown

Signature _____
 Environmental Services Co., Inc.

Environmental Services Company, Inc.

Corporate Office
 13715 West Markham
 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (501)750-1170 Fax (501)750-1172

Control Number: 0604020200 Sample Date : 04/12/06 Collected By: J. SNYDER
 Customer Name : SUPERIOR INDUSTRIES INTL INC Sample Time : 0900 Delivery By : SJI
 Customer Number : 1429 Sample Type : GRAB Work Order :
 Report Date : 04/24/06 Sample From : OUTFALL 004 Purchase Order :

Laboratory Analysis			
Analysis Date	Time	By	Parameter
04/24	0900	ARH	Cyanide Total (as CN)
			Result
			0.0726 mg/L
			Notes
			Quantity
			Method
			EPA 335.2

Quality Assurance
 Precision Accuracy
 % RPD % Recovery
 0.00 80.8 *

A 10.9

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Richard Brown
 Environmental Services Co., Inc.

Environmental Services Company, Inc.

Corporate Office
 13715 West Markham
 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (501)750-1170 Fax (501)750-1172

Control Number: 0604020201 Composite Date: 04/11/06 -04/11/06 Collected By: J. SNYDER
 Customer Name: SUPERIOR INDUSTRIES INTL INC Sample Time: 1200-1200 Delivery By: SJI
 Customer Number: 1429 Sample Type: FPC Work Order:
 Report Date: 04/21/06 Sample From: EFFLUENT Purchase Order:

Analysis				Laboratory Analysis			Quality Assurance		
Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
04/21	0944	BGW	Chromium	0.1500 mg/L			EPA 200.7	1.01	99.5 *
04/21	0944	BGW	Nickel	0.3690 mg/L			EPA 200.7	0.20	99.9 *
04/21	0944	BGW	Copper	0.3700 mg/L			EPA 200.7	0.98	101.3 *
04/21	0944	BGW	Zinc	0.0840 mg/L			EPA 200.7	2.93	101.4 *
04/21	0944	BGW	Silver	< 0.0010 mg/L			EPA 200.7	1.89	106.0 *
04/21	0944	BGW	Cadmium	< 0.0040 mg/L			EPA 200.7	1.03	96.7 *
04/21	0944	BGW	Lead	< 0.0100 mg/L			EPA 200.7	1.15	95.9 *

A-101

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Richard Brown
 Environmental Services Co., Inc.

Environmental Services Company, Inc.

Corporate Office
 13715 West Markham
 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (501)750-1170 Fax (501)750-1172

Control Number: 0604020202 Composite Date: 04/11/06 -04/12/06 Collected By: J. SNYDER
 Customer Name : SUPERIOR INDUSTRIES INTL INC Sample Time : 1200-1200 Delivery By : SJI
 Customer Number : 1429 Sample Type : FPC Work Order :
 Report Date : 04/21/06 Sample From : EFFLUENT Purchase Order :

Laboratory Analysis

Analysis		Laboratory Analysis			Quality Assurance				
Date	Time	BY	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
04/21	0944	BGW	Chromium	0.2580 mg/L			EPA 200.7	1.01	99.5 *
04/21	0944	BGW	Nickel	0.3510 mg/L			EPA 200.7	0.20	99.9 *
04/21	0944	BGW	Copper	0.3020 mg/L			EPA 200.7	0.98	101.3 *
04/21	0944	BGW	Zinc	0.0720 mg/L			EPA 200.7	2.93	101.4 *
04/21	0944	BGW	Silver	< 0.0010 mg/L			EPA 200.7	1.89	106.0 *
04/21	0944	BGW	Cadmium	< 0.0040 mg/L			EPA 200.7	1.03	96.7 *
04/21	0944	BGW	Lead	< 0.0100 mg/L			EPA 200.7	1.15	95.9 *

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Richard Brown
 Environmental Services Co., Inc.



SUPERIOR INDUSTRIES INTERNATIONAL, INC.

1901 BORICK DRIVE • FAYETTEVILLE, AR 72701
(479) 443-7870 • FAX (479) 443-4522

Certified Mail Return Receipt: 7002 2030 0000 8731 1367

July 14, 2006

Attn: Denise Georgiou, Industrial Pretreatment Coordinator
City of Fayetteville Wastewater Treatment Facility
1400 North Fox Hunter Road
Fayetteville, AR 72701

Re: NOV Response for April & May 2006

Dear Denise,

Attached are the two signed Notice of Violation forms as required. As you and I have discussed on the telephone, Superior has investigated the incidents in question and have identified the suspected causes, taken corrective action, and a process change is pending that should prevent reoccurrence.

CAUSES: Drag-out of trace solids/sludge through the Plating Plant clarifier has been identified as the likely cause on the high-flow days in question. The sludge contains some trace metal constituents. This determination was reached by verifying the lab results on split samples, verifying internal process control results for the Waste Treatment discharges were within acceptable limits, measuring the sludge levels in the "4-Stage Pit" and "Clarifier", and ensuring that there were no obstructions in the discharge flume or piping that could have artificially elevated flow meter readings.

CORRECTIVE ACTIONS: Corrective actions that have been taken since identification of the causes include pumping off the settled sludge from the internal "4-stage pit" for off-site disposal on 5/21/06, and pumping off the clarifier sludge for off-site disposal on 7/3/06. By taking these steps to lower the sludge levels, there is less opportunity for potential "drag-out" of trace solids in the discharge water.

PREVENTION: Sludge levels will continue to be periodically monitored to help ensure they do not exceed a reasonable level, and will be pumped out for off-site disposal as-needed. As you know, due to business conditions, Superior's Fayetteville Plating Operation will be shut down in the near future. Once closure of this process is complete, there will no longer be copper, nickel or chrome in wastewater discharges and the Waste Treatment system will be decommissioned.

For Deliver 14-JUL-06
Rec'd Postmark _____ Data Entry _____ NOV _____
A-10K

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.

Please feel free to contact me if you need any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Garnett Wise".

Garnett Wise
Environmental Manager

Attachments

RECEIVED JUL 10 2006

ATTN: Garnett Wise

City of Fayetteville Industrial Pretreatment Program
Notice of Violation

In accordance with Part 51.083(A) of the Fayetteville Code of Ordinances, this instrument serves as a written notice of violation of the industrial wastewater discharge permit and/or requirements of federal, state, or local regulations pertaining to wastewater discharge. Notice of violation shall not be a bar against, or prerequisite for, taking any other action against the user.

Discharger: Superior Industries International, Inc. Address of Discharge: 1901 Borick Drive
Permit #: FAY09 Date Notice Issued: June 27, 2006

Date Violation Occurred	In Violation of: (permit, Ord., other)	# of Violations	Nature of Violation (Violation result)	Source of Data	% violations*
03-May-06 & 04-May-06	Permit # FAY09	2	Daily Chromium > 1.262 lb./day (3.582, 1.778)	Self-Monitoring Report	22%
03-May-06 & 04-May-06	Permit # FAY09	2	Daily Copper > 2.345 lb./day (3.570, 2.516)	Self-Monitoring Report	22%
03-May-06 & 04-May-06	Permit # FAY09	2	Daily Nickel > 3.048 lb./day (4.731, 3.730)	Self-Monitoring Report	22%
May 2006	Permit # FAY09	1	Monthly Average Chromium > 0.686 lb./day (1.154)	Self-Monitoring Report	100%
May 2006	Permit # FAY09	1	Monthly Average Copper > 1.274 lb./day (1.662)	Self-Monitoring Report	100%
May 2006	Permit # FAY09	1	Monthly Average Nickel > 1.656 lb./day (2.391)	Self-Monitoring Report	100%

* % violations = (# violations in the month/# measurements)x100

Receipt of Notice Acknowledged by:

GARNETT WISE
Authorized Signatory (Print)
Garnett Wise
Signature

Environmental Manager
Title
7/19/06
Date Signed

Within 5 business days of receipt of this notice, return the signed form with a written response identifying the suspected cause of the violation(s), and a plan for correction and prevention to include specific required actions to:

City of Fayetteville Wastewater Treatment Facility
1400 N. Fox Hunter Rd.
Fayetteville, AR 72701
ATTN: Industrial Pretreatment Coordinator

(phone) 443-3292
(fax) 443-5613
if fax is used to meet 5 day requirement,
original must be mailed.

Authorized Representative:

David Jurgens
David Jurgens, Water and Wastewater Director

A-102

ATTN: Garnett Wise

City of Fayetteville Industrial Pretreatment Program
Notice of Violation

In accordance with Part 51.083(A) of the Fayetteville Code of Ordinances, this instrument serves as a written notice of violation of the industrial wastewater discharge permit and/or requirements of federal, state, or local regulations pertaining to wastewater discharge. Notice of violation shall not be a bar against, or prerequisite for, taking any other action against the user.

Discharger: Superior Industries International, Inc. Address of Discharge: 1901 Borrick Drive
Permit #: FAY09 Date Notice Issued: June 27, 2006

Date Violation Occurred	In Violation of: (permit, Ord., other)	# of Violations	Nature of Violation (Violation result)	Source of Data	% violations*
19-Apr-06	Permit # FAY09	1	Daily Chromium > 1.262 lb./day (1.335)	Self-Monitoring Report	13%
April 2006	Permit # FAY09	1	Monthly Average Chromium > 0.686 lb./day (0.700)	Self-Monitoring Report	100%

* % violations = (# violations in the month/# measurements)x100

Receipt of Notice Acknowledged by: GARNETT WISE Title: Environmental Manager
 Signature: *Garnett Wise* Date Signed: 7/14/06

Within 5 business days of receipt of this notice, return the signed form with a written response identifying the suspected cause of the violation(s), and a plan for correction and prevention to include specific required actions to:

City of Fayetteville Wastewater Treatment Facility (phone) 443-3292
 1400 N. Fox Hunter Rd. (fax) 443-5613
 Fayetteville, AR 72701
 ATTN: industrial Pretreatment Coordinator

Authorized Representative: *David Jurgens*
 David Jurgens, Water and Wastewater Director

FILE COPY

Denise Georgiou

From: "Garnett Wise" <gwise@supind.com>
To: "Denise Georgiou" <dgeorgiou@arkansasusa.com>
Cc: "Butch Scruggs" <bscruggs@supind.com>; "Lynn Pate" <LPate@supind.com>; "Tim Barry" <tbarry@supind.com>; "Bill Kelley" <bkelley@supind.com>; "Carolyn Collins" <ccollins@supind.com>
Sent: Thursday, August 17, 2006 2:04 PM
Subject: Permit #FAY09, follow-up to 24-hour report

Denise,

This e-mail is to follow up on the permit-required 24-hour report I made to you by telephone around 12:15 pm today, that based on certified lab results received from ESC Labs received by fax at 3:56 pm yesterday, Superior exceeded copper discharge permit limits in late July:

- The pound/day permit limit of 2.345 for Copper was exceeded on July 26 (4.5734 lb/day) and July 27 (3.2728 lb/day).
- The monthly average pound/day permit limit of 1.274 for Copper was exceeded for the month of July (1.8558 lb/day avg.).

In each of these occurrences, the daily concentrations and monthly average concentrations were within permit limits. These results will be included in the Discharge Monitoring Report for the month of July. Meanwhile, two other retained samples from the week of July 24th will be submitted to ESC for analyses, and the results will be furnished to OMI in a revised DMR.

Our review of the cause indicates that the copper soak tank overflowed, which was designed to discharge straight to the clarifier without going through waste treatment. Since that time, the copper soak operation has been taken out of service as part of the Plating Plant decommission project. Please feel free to contact me if I can provide any additional information.

Garnett Wise
Environmental Manager
Superior Industries Int'l Inc. - Fayetteville, AR
443-7870 x6331

Superior's EMS Policy is the "Circle of Commitment": Compliance → Continuous Improvement → Pollution Prevention

8/17/2006

A-10.2

FILE COPY

Denise Georgiou

From: "Garnett Wise" <gwise@supind.com>
To: "Denise Georgiou" <dgeorgiou@arkansasusa.com>
Sent: Thursday, August 24, 2006 3:27 PM
Subject: RE: Permit #FAY09, follow-up to 24-hour report of 8/18/06

Thanks. I understand. We'll take our lumps.

From: Denise Georgiou [mailto:dgeorgiou@arkansasusa.com]
Sent: Thursday, August 24, 2006 3:26 PM
To: Garnett Wise
Subject: Re: Permit #FAY09, follow-up to 24-hour report of 8/18/06

Garnett,

Unfortunately without any better evidence that the samples were tampered with, we can't just eliminate them.

You can run more samples from August to show these two days were not representative of the discharge for the month.

Denise Georgiou
 Industrial Pretreatment Coordinator
 OMI
 1400 N. Fox Hunter Road
 Fayetteville, AR 72701
 479.443.3292 Tele
 479.443.5613 Fax
dgeorgiou@arkansasusa.com

----- Original Message -----

From: Garnett Wise
To: Denise Georgiou
Cc: Butch Scruggs ; Lynn Pate ; Tim Barry ; Bill Kelley ; Carolyn Collins
Sent: Monday, August 21, 2006 3:07 PM
Subject: Permit #FAY09, follow-up to 24-hour report of 8/18/06

Denise,

This e-mail is to follow up on the permit-required 24-hour report I made to you by telephone early in the afternoon of Friday 8/18/06, that based on certified lab results received from ESC Labs by fax at 3:33 pm on 8/17/06, Superior exceeded wastewater discharge permit limits in early August. As you and I discussed, we feel the samples appear to have been tainted. Steve Woosley of ESC Labs made a point of calling me before faxing the results, stating that their lab technician noted "floaties" in the samples that were not characteristic of Superior's typical discharge samples, and that the lab results indicated numbers that seemed to be impossibly high. Your indication that the City did not experience any inhibition of its biological treatment system on the dates in question, supports my feeling that the samples were not representative of actual discharges. The lab results were as follows:

- On August 1st and 2nd, the pound/day permit limit for chromium (1.262 lb/day) was exceeded; results showed 10.7783 lb/day and 3.6580 lb/day.
- On August 1st and 2nd, the pound/day permit limit for copper (2.345 lb/day) was exceeded; results showed 4.2403 lb/day and 5.3039 lb/day.
- On August 1st and 2nd, the pound/day permit limit for nickel (3.048 lb/day) was exceeded; results showed 6.1110 lb/day and 3.5757 lb/day.
- The "month-to-date" monthly average pound/day permit limits for chromium, copper and nickel are over their respective limits, but these will averages will of course change as the month progresses.

A-100

8/24/2006

The timing of these particular samples in question was at the end of the Plating Plant's production run. This was a time when some employees were upset due to the impending loss of their jobs, and there is possible that the sample may have been tampered with. We are submitting additional retained samples from the first week of August to hopefully provide a more representative picture of our actual operations. If possible, Superior would like seek your permission to strike the two tainted samples from our DMR records. Please let me know if this would be possible, or if you need additional information to allow this.

Thank you for your consideration.

Garnett Wise
Environmental Manager
Superior Industries Int'l Inc. - Fayetteville, AR
443-7870 x6331

Superior's EMS Policy is the "Circle of Commitment": Compliance → Continuous Improvement → Pollution Prevention

Attachment A 11

P2 Projects for Fayetteville, AR

- The Wastewater System Improvement Project (WSIP) is a system wide project that significantly increases the capacity of the City's wastewater system. This project addresses capacity shortfalls in the wastewater collection and treatment systems; the design is expected to treat the wastewater for 115,000 people. This project will increase the City's wastewater treatment capacity from 12.6 to 21.4 million gallons per day, and will reduce the number of sewer system overflows due to rain entering the system. It also improves odor control facilities system wide. The west side wastewater treatment plant will start treating wastewater in mid 2008.
- Beaver Water District and City of Fayetteville signed an agreement including a nutrient reduction plan to address total phosphorus (TP), optimization of the Noland WWTP for a discharge at or below 0.5 mg/l TP on an annual average, plus TP loading, reporting, spending, and other watershed protection activities.
- Pinnacle Foods switched to non-phosphate soaps and sanitizers.
- The Industrial Pretreatment Program (IPP) Department presents 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. From these meetings, a group formed to discuss a possible industrial park equalization pond. No pond was built.
- Added a requirement for pollution prevention assessments to SIU permits starting in 1996. Results from a first assessment spawned a permanent in-house pollution prevention group for one industrial user.
- A "sample save" program is included in the industrial waste discharge permits of two large metal platers that requires daily composite samples be held for 30 days. In the event of an upset or other indication of potential metals contamination, these saved samples can be collected by the POTW and analyzed. Because turnaround times is 1 to 2 weeks for metals analysis, the industrial user can also send saved samples in after noting a violation, to show the violation was not a continuing problem.
- Performance-based the industrial waste discharge permit limits are used to limit unnecessary pollutant load allowances.
- Two industrial users voluntarily eliminated molybdenum based lubricants when industrial users were notified of the potential 40 CFR 503 regulations.
- Metals loading to the POTW has remained stable because of education, P2 assessments, and performance-based limits.
- Superior Industries is ISO 14001 certified.
- Fayetteville Industrial Pretreatment Program personnel were active and instrumental in the Household Hazardous Waste Task Force that resulted in collections twice per year and eventually led to the Tri-County Solid Waste District permanent household hazardous waste collection site in Fayetteville.
- Information on Metal Products and Machinery was disseminated through IPP seminars, email, telephone calls, and during inspections while the regulation was being developed and proposed. IPP personnel designed and sent a reminder postcard for ADEQ's seminar in Springdale, AR to a Northwest Arkansas mailing list that resulted in a large turnout.

- The IPP Department held a special seminar for local photographers to present options for silver recovery.
- IPP personnel assisted in coordinating ADEQ's silver and mercury workshop in Springdale, AR and sent a separate invitation to a targeted audience to pull in a large crowd.
- Fayetteville IPP teamed up with ADEQ, UALR, and other Northwest Arkansas Water Utilities to present a seminar on carpet cleaners discharge issues. Also worked with Washington County Extension Service and HAZMert.
- IPP personnel worked as part of a Pesticide Education Group to present pesticide issues to various civic groups.
- IPP personnel sent invitations to local hospitals and clinics for two of the hospitals for a healthy environment seminars in Arkansas.
- The IPP Department has provided Industrial Materials Exchange information and more recently Arkansas Materials Exchange (ARMAX) information to industrial users.
- Fayetteville's IPP library of EPA guidance including the EPA *Guides to Pollution Prevention* series is available to industrial users and recommended for pollution prevention assessments.
- Fayetteville's Adopt a Park and Curb-the-Clutter programs assist volunteers with materials and supplies for litter collection. In 2004, the Curb the Clutter program collected 85.82 tons of litter from 40 miles of city streets.
- Fayetteville wards are eligible for 4 clean up events throughout the year to give residents a chance to remove large trash items from their neighborhoods.
- Each year to honor and showcase the importance of Earth Day, the City hosts a Bulky Waste Round-Up on a Saturday before or after Earth Day. This clean-up event is for customers to dispose of large bulky items at the Solid Waste and Recycling facility free of charge.
- Fayetteville Solid Waste and Recycling Division provides for the collection of commercial and residential waste for the City of Fayetteville. Composting and Recycling programs are operated jointly to divert the maximum amount of material from the landfill to productive use. Residential trash is collected under a Pay-As-You-Throw program. In 2005 the following percentages made up the waste stream collected by the Division: Residential Waste 20%; Commercial Waste 46%, Recycling 10%, Yard waste and Composting 11% and Drop Box Waste (typically construction waste) 13%.
- City of Fayetteville's web site has reminders, education, information, and links for reduce, reuse and recycle, and other environmental issues.
- Fayetteville Public Library registered for LEED (Leadership in Energy and Environmental Design) certification on July 5, 2001. It is the first project registered in Arkansas.
- The City of Fayetteville has a Waste Reduction Coordinator available for talks on recycling and solid waste programs. If your organization, civic group, or school would like to schedule a presentation please call (479) 718-7685 or e-mail solidwaste@ci.fayetteville.ar.us

A-116

- Each spring, Fayetteville partners with Keep Arkansas Beautiful to help sponsor the Great American Cleanup. This effort typically runs from March through May and works to gather volunteers to clean area streets, creeks and other places.
- The Fayetteville School Resource Officers along with the Fayetteville Police Department support the Fayetteville Public School System's S.T.O.P.S. Program. The S.T.O.P.S. Program is a plan that allows students to make a difference in their schools and communities by improving the maintenance and control of litter on campus.
- In 2006, for the 5th consecutive year, Fayetteville was recognized by the America in Bloom/Communities in Bloom program.
- The Fayetteville Downtown Master Plan envisions the continued growth of Dickson Street and identifies the need for one or more parking decks to support that growth. In 2005, the University of Arkansas and the City of Fayetteville partnered together and hired Martin, Alexiou, and Bryson to complete a Dickson Street Parking Deck Feasibility Study.
- The Fayetteville Natural Heritage Association (FNHA) has received a grant from the Urban and Community Forestry Assistance Grant Funds to identify the highest priority areas in and around Fayetteville for conservation before they disappear due to population growth. Benefits of land conservation will include cleaner water, saving natural areas, and increased opportunities for recreational use of trails. FNHA will also use the information to help landowners identify and preserve valuable natural areas for the future.
- The City of Fayetteville determined that its Hillside/Hilltops need additional protection and preservation enhancements to lessen grading, drainage, and storm water problems, and to preserve Fayetteville's beauty, clean water, and clean air. Hillside Overlay District regulations were approved by the City Council. The Hillside Overlay District is comprised of three elements; the Unified Development Code Ordinance Amendments, the Hillside Overlay District Best Management Practices Manual, and the Hillside Overlay District Map.
- Mayor Coody has introduced a Tree Preservation and Protection Ordinance for consideration by the City Council. This item was referred to the Ordinance Review Committee and will be heard when the committee has returned it to City Council. (2006)
- In 2005, the City of Fayetteville reviewed their trails program and decided it was more efficient and quicker to begin building the trails system in house. Now with a collaborative effort between Parks and Recreation, Transportation and the Engineering Divisions, approximately 5 miles of trails are constructed annually. These trails provide safe and accessible recreation for citizens while providing alternative transportation opportunities for citizens and visitors.
- With the help of the Urban and Community Forestry Grant Assistance Program, sponsored by the Arkansas Forestry Commission, the City of Fayetteville has been able to do great things. Some of which include contracting for a tree inventory, creating planters and medians down Dickson Street and purchasing an aerial bucket truck with chipper. All of these projects directly correlate to preserving a healthy urban forest. Not only do trees add to the aesthetics of our city, shade our trails, and give good homes to wildlife; trees also provide

economical, environmental, and behavioral benefits. Using trees as wind blocks or as shade producers will decrease your utility bill substantially. Trees also remove huge quantities of pollutants from the air and aid in erosion control and storm water runoff.

