

# ADEQ

ARKANSAS  
Department of Environmental Quality

September 21, 2012

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

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

Dear Mr. Jurgens:

Please find enclosed the finished report for the audit/assessment conducted August 21 through August 23, 2012. The report should be made available for review to appropriate industrial officials. Your staff should discuss and evaluate the findings in this report. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

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

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

Sincerely,



Rufus J. Torrence, Water Division Engineer

Encl: Audit/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)  
Eric Flemings / ADEQ Branch Manager-Field Services (w/o attmt)  
Craig Uyeda / ADEQ Branch Manager-Enforcement (w/o attmt)

*PRETREATMENT PROGRAM AUDIT/  
POLLUTION PREVENTION ASSESSMENT  
CITY OF FAYETTEVILLE, ARKANSAS*

*NPDES PERMIT #AR0020010*

*September 21, 2012*

*Prepared by: Rufus Torrence*

*Water Division Engineer*

*ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY*

*5301 Northshore Drive*

*North Little Rock, Arkansas 72118*

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**LIST OF ATTACHMENTS**

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachments: Supporting Documentation

- A - Tyson Permit Application
- B - Tyson Industrial Waste Discharge Permit No. FAY07
- C - Excerpt from Hiland Permit No. FAY05
- D - Excerpt from Elkhart Permit No. FAY03 & Fact Sheet
- E - Excerpt from Superior Permit No. FAY09
- F - Excerpt from Ayrshire Permit No. FAY15
- G - Tyson Compliance Evaluation Report
- H - Tyson DMR
- I - Ayrshire STOMP
- J - Local Limits [City Codes; §51.075(D)]
- K - Typical Characteristics of Domestic Sewage

## A) INTRODUCTION

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

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

The Water Division Engineer performed an audit from August 21<sup>st</sup> through the 23<sup>rd</sup>, 2012 on the Pretreatment Program implemented by the City of Fayetteville, Arkansas.

Participants included:

Rufus Torrence	ADEQ / Water Division Engineer / Auditor
Denise Georgiou	City / Industrial Pretreatment Coordinator
Duyen Tran	City / CH2M Hill Project Manager

The goals of the audit/assessment were:

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

The original City of Fayetteville Pretreatment Program was approved on April 26, 1984. The City modified the original Program and ADEQ incorporated the modification into the NPDES permit on July 14, 1998. The City must modify the program again to include recent revisions to 40 CFR Part 403 commonly referred to as the “Streamlining Revisions” promulgated on October 5, 2005. The program is administered and implemented by CH2M-Hill Engineering, Inc. under a multi-year operations contract.

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

There has been no pattern of aquatic toxicity observed in either POTW’s effluent. In January 2012, the Noland POTW effluent had sub-lethal effects on the *Pimephales promelas* (Fathead minnow). The two required subsequent retests passed both lethal and sub-lethal endpoints.

The Noland POTW has a design flow of 12.6 MGD (permit limits were based on 11.2 MGD) and an average influent flow of 6.2 MGD. Approximately 15% of the Noland flow is from eight (8) significant industrial users (SIUs). Four (4) of these SIUs are categorical. The West Side POTW has a design flow of 10 MGD and an average influent flow of 6.3 MGD. The West Side POTW currently has no SIUs.

The City recently started processing the sludge from both POTWs in a drying complex (solar and gas-fired) located at the Biosolids Management Site adjoining the Noland treatment plant. Class A sludge from the site is sold locally as fertilizer. The Class B sludge is land applied in Kansas. Sludge which does not meet Class A or B standards is hauled to a landfill in Arkansas or Missouri.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of their industrial user files, pretreatment records, site visits to five (5) of their permitted industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included in Attachments.

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

**B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS**

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

1) Under **40 CFR 403.4** The City cannot have any local regulations (ordinance/code) that are "*less stringent than any set forth in National Pretreatment Standards, or any other requirements or prohibitions established under the Act...*".

On October 14, 2005 EPA promulgated revisions to 40 CFR 403. These revisions are commonly referred to as the "Streamlining" revisions. Each POTW with an approved pretreatment program must review the local legal authority to ensure that local ordinances/codes are not less stringent than the Streamlining revisions.

The City's last revision to the legal authority was incorporated into the NPDES permit on July 14, 1998. For national consistency, the Department decided to wait for EPA to develop guidance before reviewing ordinances and approving modifications to Arkansas approved pretreatment programs. In January 2007 EPA published a "Model Pretreatment Ordinance" with the recent Streamlining Revisions. In reference to Part II in the City's NPDES permit number AR0020010 currently on hold pending third-party rulemaking, find in section 7.a, "*The Sewer Use Ordinance and the Pretreatment Program have not been modified to come into compliance with the current 40 CFR 403 regulations [Streamlining Revisions]. The permittee shall submit the Ordinance revisions to ADEQ within twelve (12) months of the effective date of this permit.*"

2) Under **40 CFR 403.5(c)** "*Each POTW with an approved pretreatment program shall continue to develop [local] limits as necessary...*" Under **40 CFR 122.44(j)(2)(ii)**, the City must update or assess local limits at least every permit cycle. In reference to NPDES permit number AR0020010 (section 7.b on page 5 of Part II), find this tentative language (at this time the permit has not been issued):

*The permittee shall submit, within sixty (60) days of the effective date of this permit, (1) a **WRITTEN CERTIFICATION** that a technical evaluation has demonstrated that the existing technically based local limits (TBLL) are based on current state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment facility, worker health and safety problems, and sludge contamination, (2) a **WRITTEN NOTIFICATION** that a technical evaluation revising the current TBLL will be submitted within 12 months of the effective date of this permit, OR (3) within sixty (60) days of the effective date of this permit, submit a **WRITTEN NOTIFICATION** that local limits are not necessary for any pollutant at this time.*

Note that in accordance with 40 CFR 403.8(f)(4), the City "*shall develop local limits as required in 403.5(c)(1), or demonstrate that they are not necessary*". See Recommendation #6 below for more details.

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

- 1) The currently approved program document does not have a comprehensive narrative. In conjunction with the requirement in Section D below, the Department has provided the City with guidance which the City may use to develop a narrative.
  
- 2) The City should develop a comprehensive Enforcement Response Plan to include a narrative with at least the eight criteria for Significant Non-Compliance. The Department has provided the City with guidance for the plan, too.
  
- 3) The City should add an additional column to the Enforcement Response Guide to show which official is responsible for each type of enforcement action.
  
- 4) The City should consider not showing numerical limits in the new Streamlining ordinance. Referring to attachment J-7/8, the City has listed numerical limits in the ordinance/code. When the City updates the pretreatment program to comply with the Streamlining revisions, the City should consider revising the language in the ordinance to show the following:

#### Local Limits

*To protect against pass through and interference, no Industrial User may discharge or cause to be discharged into the POTW any wastewater pollutant concentration exceeding the Technically Based Local Limits (TBLLs) developed from time to time by the Utilities Director of City of \_\_\_\_\_ Utilities as required by Part III in City of \_\_\_\_\_ NPDES permits No. AR00\_\_\_\_\_, authorized by 40 CFR 403.5 (c) and approved by the Approval Authority. TBLLs based on calculated Maximum Allowable Industrial Loadings are located in the City's Pretreatment Program, Section \_\_\_\_\_. At the discretion of the Utilities Director, TBLLs may be imposed and shall apply at the "monitoring point" described in the individual industrial wastewater discharge permits. All concentration limits for metals shall be in terms of "total" metals unless otherwise indicated. At the discretion of the Utilities Director, mass limitations may be imposed in addition to or in place of concentration based TBLLs. The Utilities Director may also develop BMPs in individual wastewater discharge permits, to implement specific pollutant limitations. Such BMPs shall be considered Local Limits and Pretreatment Standards. When new Local Limits are implemented or revised, the Utilities Director will provide individual notice to parties who have requested such notice and an opportunity to respond, as set forth by 40 CFR 403.5 (c) (3). This requirement of notice also applies when Local Limits are set on a case-by-case basis.*

6) The actual headworks loadings (metals, cyanide, CBOD<sub>5</sub>, TSS and NH<sub>3</sub>-N) are consistently less than 50% of the MAHLs. The current actual headworks loadings for minerals (TDS, Cl & SO<sub>4</sub>) are approaching the interim MAHLs for these parameters and may exceed the final MAHLs. The Department recommends asking the point sources (food processors) of minerals to voluntarily develop BMPs for at least TDS. For the scenario describe here, the City does not need local limits and may elect to demonstrate that local limits are not necessary at this time. The department recommends that the City elect this option to satisfy the requirement in section 7.b of Part II of the NPDES permit by submitting a letter to ADEQ stating that local limits are not necessary at this time. If the City elects this option, the Department will make at least an annual review (in May after receipt of the annual report) to verify that local limits are still not necessary. Finally, in reference to this option, in the future after proper notification to the Department, the City may elect to implement local limits again (including placing BMPs for TDS in SIU permits).

7) The City should include a schematic diagram in the folder of each permittee which has an alternative limit based on 40 CFR 403.6(e). See Fig 3.4 on page 3-22 in EPA Guidance on Production Based Standards and the CWF. In accordance with 40 CFR 403.12(b)(3), a schematic process diagram is required for all CIU folders.

8) In reference to paragraph number six (6) above, the City should request point sources of Chlorides, Sulfates and TDS to develop BMPs. The BMPs should have the following goals:

a. Concentrations: Interim limits for **Cl/SO<sub>4</sub>/TDS** of **100/20/500** and final limits of **20/20/160** mg/l. Note that the interim limits are based on the average values in Table 2-2 Typical Characteristics of Domestic Sewage (Attachment K-1/1) in *EPA Design of Wastewater Treatment Facilities Major Systems (430979008)*. The City should test the actual domestic concentrations for these parameters and use the more stringent value for the interim limit goals. The final limit goals may change pending third party rulemaking.

b. Flow Reduction or “Equivalent Mass Reduction”: The SIUs may have difficulty reaching the concentration goals. However, by significantly reducing their flows, the SIUs may be able to achieve an equivalent reduction in mass rate to the POTW. In other words, the concentration can be higher than the goals above if the flow is significantly reduced.



9) In reference to local limits and BMPs:

- a. The monitoring data in the 2011 Annual Report show that the POTWs are not within 60% of the MAHLs for any pollutants except for minerals. Since no firm guidance is available on BMPs for food processors to control TDS, the City should not place BMPs in SIU permits at this time (ask for voluntary efforts only).
- b. If the City elects to demonstrate that local limits are not necessary at this time, the City must ask for voluntary efforts and cannot place BMPs in permits. In accordance with 40 CFR 403.5(c)(4), BMPs (when approved by ADEQ and placed in SIU permits) are local limits and Pretreatment Standards.
- c. The City may place a BMP in Ayrshire's permit to control metals and cyanide without the Department's oversight if the City designates Ayrshire as a Non-SIU.

Therefore, based on these three observations above, the Department recommends that the City elect to demonstrate that local limits are not necessary at this time.

**10)** In reference to paragraph 9.c above, the City should designate Ayrshire as a Non-Significant Industrial User (Non-SIU). Non-SIUs are not subject to oversight by the Approval Authority. Nonetheless, the City can continue to permit and inspect Non-SIUs but Non-SIUs must not be included in annual reports to the Department.

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

The City's Pretreatment Program must be modified to be current with the newly revised **40 CFR 403**. NPDES permit number AR0020010 requires the City to submit the ordinance revision to the Department within twelve (12) of the effective date of the permit. The City must comply with these changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). The City must also review the existing approved program and make all necessary modifications to comply. Some of the streamlining changes are less stringent than the previous pretreatment regulations and the City may at its option elect to include these changes in the program modification. However, thirteen (13) elements are more stringent than the previous pretreatment regulations and the City must ensure that the approved program contains all applicable more stringent streamlining changes. The City should note that some of the elements may not be applicable to the City's approved program.

The auditor has made a preliminary and cursory review of the City's program and at this time the following summary contains the applicability of the thirteen elements to the City's existing program. The City has satisfied some elements while additional efforts are required on other elements.

1. *Updated removal credits provisions relating to Overflows [§ 403.7(h)]*

Not Applicable: The City currently does not grant removal credits.

2. *Slug control requirements must be included in SIU control mechanisms [§403.8(f)(1)(iii)(B)(6)]*

Required: The City has included slug control language in the City Codes [§51.076(C)] and the inspection form (Attachment G-9/11) but the City currently does not have the proper legal authority to fully implement this requirement in permits.

3. *SIUs must be evaluated for the need for a plan or other action to control slug discharges within a year from the final rule's effective date or from becoming an SIU [§403.8(f)(2)(vi)]*

Satisfied: The City is presently in compliance with this requirement.

4. *SIUs are required to notify the POTW immediately of any changes at its facility affecting the potential for a slug discharge [§403.8(f)(2)(vi)]*

Required: The City has included notification language in permits but does not have the proper legal authority.

5. *Significant Noncompliance (SNC) definition is expanded to include additional types of Pretreatment Standards and Requirements [§403.8(f)(2)(viii)(A-C)]*

Required: The City Codes currently do not have the expanded definition of SNC.

6. *SIU reports must include BMP compliance information [§ 403.12(b), (e), (h)]*

Required: The City must update the legal authority to require BMP compliance information.

7. *SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law [§ 403.8(f)(1)(iii)(B)(3)]*

Required: The City must update the legal authority to require BMPs in SIU permits.

8. *Documentation of compliance with BMP requirements must be maintained as part of the SIU's and POTW's record-keeping requirements [§ 403.12(o)]*

Required: The City must update the legal authority to require documentation of BMPs.

9. *Control Authorities which perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation [§ 403.12(g)(2)]*

Satisfied: The City presently has "Right of Entry" for inspection and sampling.

10. *Require periodic compliance reports to comply with sampling requirements, require Control Authority to specify the number of grab samples necessary in periodic and non-categorical SIU reports, and require non-categorical SIUs to report all monitoring results [§ 403.12(g)(3),(4), (6)]*

Satisfied: The City Codes presently specifies grab samples for all SIUs and reporting of all monitoring results.

11. *Non-Categorical SIUs are required to provide representative samples in their periodic monitoring reports [§ 403.12(g)(3)]*

Satisfied.

12. *Require notifications of changed discharge to go to the Control Authority and the POTW, where the POTW is not the Control Authority [§ 403.12(j)]*

Not Applicable:

13. *How and when the POTW can designate a "duly authorized employee" to sign POTW reports [§ 403.12(m)].*

Not Applicable:

Finally, the City may adopt the EPA Model Pretreatment Ordinance (January 2007) to ensure that all required updates are included in the new legal authority.

**E) CONCLUSIONS**

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

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SECTION I: GENERAL INFORMATION

# 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: Utilities Department Director  
  
Telephone: (479) 575-8330 FAX NUMBER: (479) 575-8257  
  
Pretreatment Contact: Denise Georgiou Title: CH2M HILL Ind. Pretreat. Coord.  
Address: 1400 N. Fox Hunter Road, 72701  
Telephone: (479) 443-3292  
E-mail: denise.georgiou@CH2M.com  
Pretreatment program approval date: April 26, 1984  
  
Dates of approval of any substantial modifications: July 14, 1998  
  
Month Annual Pretreatment Report Due: May  
  
Pretreatment Year Dates: Jan 1 - Dec 31 Date(s) of Audit: Aug 21-23, 2012  
(ASSESSMENT)  
  
Inspector(s):

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
<u>Rufus Torrence</u>	<u>Engineer/ ADEQ</u>	<u>(501) 682-0626</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>(479) 443-3292</u>

\* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>Oct 2010</u>	<u>No Major Deficiencies</u>

## SECTION I: GENERAL INFORMATION

YES   NO

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

                    If yes, describe the required corrective action:

         ✓   Is the Control Authority currently in SNC or RNC?

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	Jun 1, 06	May 31, 11**
AR0050288	West Side WWTP	Dec 1, 05	Nov 30, 10**

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

\*\* Both permits have expired and renewal permits are currently on hold pending TMDL and UAA.

#### 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)- 6.2 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 8 # of CIUs : 4  
 Industrial Flow (mgd): 0.92 Industrial Flow (%) : 14.8 %

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

Receiving Streams Classification: 4K of White River

Receiving Streams Use: primary contact; fishable/swimmable

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

Method of Sludge Disposal:

Quantity of Sludge:

<input checked="" type="checkbox"/> Land Application*	<u>130</u> dry metric tons/yr.
<input type="checkbox"/> Incineration	<u>      </u> dry tons/yr.
<input type="checkbox"/> Monofill	<u>      </u> dry tons/yr.
<input checked="" type="checkbox"/> Mun. Solid Waste Landfill*	<u>1,669</u> dry metric tons/yr.
<input type="checkbox"/> Public Distribution	<u>      </u> dry metric tons/yr.*
<input type="checkbox"/> Lagoon Storage	<u>      </u> dry tons/yr.
<input type="checkbox"/> Other (specify)	<u>      </u> dry tons/yr.

\*City operates its Biosolid Management Facility where it uses solar and natural gas to dewater the sludge from both WWTPs. Part of the sludge is land applied and the rest is sold as fertilizer. Rates provided by Denise Georgiou during audit.

List of toxic pollutant limits in NPDES permit: None

## SECTION I: GENERAL INFORMATION

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

YES NO Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:  
  \_\_\_\_\_

Issuing Authority: ADEQ  
 Effective Date: June 1, 2006  
 Expiration Date: May 31, 2011

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

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

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) During the period from July 2009 to July 2012 the City performed 20 tests on the Pimephales promelas (Fathead Minnow) and 16 tests on the Ceriodaphnia dubia (Water Flea). During this period there were no Lethal failures but one Sub-lethal failures for the minnows in Jan 2012; however, the facility passed the retests during Feb and Mar 2012.

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

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

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

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

At first the BOD5 and TSS loadings decreased with start-up of West WWTP; but has recently started to increase.

YES NO N/A

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

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

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>FCB</u>	<u>O&amp;M</u>

YES NO

Has the treatment plant sludge violated the TCLP Test?



# SECTION I: GENERAL INFORMATION

## B. TREATMENT PLANT INFORMATION

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

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

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

### 2. Individual Treatment Plant Information

a. Name of Treatment Plant: West Side WWTP  
Location Address: 15 S. Broyles Ave.

Expiration Date of NPDES Permit: Nov 30, 2010

Treatment Plant Wastewater Flow: Design- 10 MGD; Actual (Average)- 6.3 MGD

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

#### Industrial Contribution to this Treatment Plant

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

#### Level of Treatment

#### Type of Process(es):

Primary	<input checked="" type="checkbox"/>	<u>bar screen; primary clarifiers;</u>
Secondary	<input checked="" type="checkbox"/>	<u>three stage biological treatment system;</u>
Tertiary	<input checked="" type="checkbox"/>	<u>secondary clarification; sand filtration; post aeration</u>

Method of Disinfection: Ultraviolet

Dechlorination  YES  NO

#### Effluent Discharge

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

Receiving Streams Classification: 3J of Ark. River Basin

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

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

#### Method of Sludge Disposal:

#### Quantity of Sludge:

<input checked="" type="checkbox"/> Land Application*	<u>130</u> dry metric tons/yr.
<input type="checkbox"/> Incineration	<u>      </u> dry tons/yr.
<input type="checkbox"/> Monofill	<u>      </u> dry tons/yr.
<input checked="" type="checkbox"/> Mun. Solid Waste Landfill*	<u>941</u> dry metric tons/yr.
<input type="checkbox"/> Public Distribution	<u>      </u> dry metric tons/yr.
<input type="checkbox"/> Lagoon Storage	<u>      </u> dry tons/yr.
<input type="checkbox"/> Other (specify)	<u>      </u> dry tons/yr.

\*City operates its Biosolid Management Facility where it uses solar and natural gas to dewater the sludge from both WWTPs. Part of the sludge is land applied and the rest is sold as fertilizer. Rates provided by Denise Georgiou during audit.

List of toxic pollutant limits in NPDES permit: none

## SECTION I: GENERAL INFORMATION

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

YES NO

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

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

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

YES NO N/A

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

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There is no ongoing TRE. During the period from July 2009 to July 2012 the facility had no lethal or sub-lethal failures for either test specie (Pimephales promelas & Ceriodaphnia dubia).

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

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

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

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

Stayed the Same

YES NO N/A

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

Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

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

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

YES NO

Has the treatment plant sludge violated the TCLP Test?

## SECTION I: GENERAL INFORMATION

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

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

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

1. Modifications:

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

2. Modifications in Progress: **None**

Date Requested	Nature of Modification
N/A	

YES NO

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

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

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

Date of original Pretreatment Program approval: 4/26/84 [WENDB-PTIM]

Date of most recent Ordinance approved by the Control authority: 4/7/98

Date of most recent Pretreatment Program modification approval: 7/14/98

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

YES NO

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

## SECTION I: GENERAL INFORMATION

- YES NO  
  Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:  
 No oversight authority  
 No inspection authority  
 No remedies for noncompliance  
 No "equivalent" standard  
 No clear delineation of responsibility for program implementation  
 Interjurisdictional agreements not entered into  
 Other, Specify:
- Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no:
- Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?
- Have provisions been made for the incorporation of Pollution Prevention (P<sup>2</sup>) policies by contributing jurisdictions?

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	<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>

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 <sup>2</sup> 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?

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

## SECTION II: PRETREATMENT PROGRAM ANALYSIS

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

YES NO Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

      If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> activity?

     Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

      If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P<sup>2</sup> activity and the distribution of P<sup>2</sup> reference materials to the IUs which qualify?

What methods are used to update the IWS:

- Review of newspaper/phone book
- Review of plumbing/building permits (*Not used*)
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify)

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

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

YES NO

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

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

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

- |    |           |  |
|----|-----------|--|
| a. | <u>8</u>  | SIUs (As defined by the Control Authority) [WENDB-SIUS]              |
| b. | <u>4</u>  | Categorical Industrial Users (CIUs) [WENDB-CIUS]                     |
| c. | <u>4</u>  | Noncategorical SIUs  |
| d. | <u>3</u>  | Other regulated nonsignificant IUs (Describe) <u>septage haulers</u> |
|    | <u>11</u> | TOTAL of a. + d.   |

YES NO

     Has the POTW identified any IUs with Pollution Prevention opportunities?

     Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1)(i-ii)]

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

---

**SECTION II: PRETREATMENT PROGRAM ANALYSIS**

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

YES    NO     
      

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

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

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

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

IU NAME	PERMIT EXPIRATION DATE
<u>N/A</u>	<u>  </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:

Pollutant	Limit
<u>N/A</u>	<u>  </u>

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

YES    NO     
        
      

Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes? Traces of 1,4 dioxane coming from the U of A remediation site. Max of 4 -4000 gallon truckloads on a rainy day.  
Does the Control Authority have a control mechanism for regulating wastes from UST sites? "Letter of Authorization"

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

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

## SECTION II: PRETREATMENT PROGRAM ANALYSIS

### G. Application of Pretreatment Standards and Requirements

YES      NO     

     Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

Date Notified '92, '98, 2008, 2011 Method of Notification Letter  
 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	<u>    </u> Other

YES      NO     

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

If yes, complete the information below:

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

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)	✓			✓	✓		<u>0.68</u>
Cadmium (Cd)	✓			✓	✓		<u>0.02</u>
Chromium-Total	✓			✓	✓		<u>0.48</u>
Copper (Cu)	✓			✓	✓		<u>0.23</u>
Cyanide (CN)	✓			✓	✓		<u>0.01</u>
Lead (Pb)	✓			✓	✓		<u>0.15</u>
Mercury (Hg)	✓			✓	✓		<u>0.0002</u>
Molybdenum (Mo) *	✓			✓			<u>0.20</u>
Nickel (Ni)	✓			✓	✓		<u>0.20</u>
Selenium (Se) *	✓			✓			
Silver (Ag)	✓			✓	✓		<u>1.23</u>
Zinc (Zn)	✓			✓	✓		<u>1.52</u>
CBOD5				✓			
TSS				✓			
NH3-N				✓			
TP				✓			
Cl				? **			
Sulfates				? **			
TDS				? **			

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

\*\* - At this time local limits for minerals appear unnecessary pending the results of the UAA and "voluntary" BMPs by SIUs to control minerals discharged to the POTW.

## SECTION II: PRETREATMENT PROGRAM ANALYSIS

YES  NO

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

POLLUTANT	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
<u>Chlorides</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> *	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>
<u>Sulfates</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> *	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>
<u>TDS</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> *	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>

\*See Note Above

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

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants?  
West Side POTW is currently operating with no SIUs at this time



## SECTION II: PRETREATMENT PROGRAM ANALYSIS

### H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

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

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

	Analytical Method *	Name of Laboratory
Metals	<u>200.7 &amp; 200.8</u>	<u>American Interplex</u>
Cyanide	<u>335.2</u>	<u>American Interplex</u>
Organics	<u>GC/MS</u>	<u>"</u>
Other	<u>Whole Effluent Toxicity</u>	<u>ASU Ecotoxicology Research Facility</u>

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

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

## SECTION II: PRETREATMENT PROGRAM ANALYSIS

YES NO  
  Does the POTW use QA/QC for sampling and analysis? If yes, describe:  
The City has done splits and duplicates in the past with various contract labs 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?

<u>YES</u>	<u>NO</u>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Scheduled compliance monitoring
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Unscheduled compliance monitoring
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Demand monitoring for IU compliance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	IU self-monitoring
<input type="checkbox"/>	<input type="checkbox"/>	Other:

YES NO

Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below. **NONE**

### I. ENFORCEMENT

YES NO  
  Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(viii)]  
The Control Authority program does not have Streamlining updates.

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

<u>YES</u>	<u>NO</u>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Describe how the Control Authority will investigate instances of noncompliance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Describe the Control Authority's types of escalating enforcement responses and the periods for each response
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Identify by Title the Official(s) responsible for implementing each type of enforcement response
<input checked="" type="checkbox"/>	<input type="checkbox"/>	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)]

## SECTION II: PRETREATMENT PROGRAM ANALYSIS

YES      NO     

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

Has the Control Authority experienced any of the following:

YES      NO     

EXPLAIN and ID Industrial User

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

YES      NO     

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

     0 How many SIUs are currently on compliance schedules?

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

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

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

## SECTION II: PRETREATMENT PROGRAM ANALYSIS

<input checked="" type="checkbox"/> Notice or letter of violation <input checked="" type="checkbox"/> Setting of compliance schedule <input checked="" type="checkbox"/> Injunctive relief	<input checked="" type="checkbox"/> Administrative Order <input checked="" type="checkbox"/> Revocation of permit <input checked="" type="checkbox"/> Fines (maximum amount):
civil criminal administrative	\$ <u>1000</u> /day/violation \$ _____ /day/violation \$ <u>1000</u> /day/violation
<input type="checkbox"/> Imprisonment <input checked="" type="checkbox"/> Termination of Service <input type="checkbox"/> Other: _____	

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

<u>YES</u>	<u>NO</u>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
<input checked="" type="checkbox"/>	<input type="checkbox"/>	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:
<input type="checkbox"/>	<input checked="" type="checkbox"/>	If no, does the Control Authority conduct all of the monitoring?

<u>YES</u>	<u>NO</u>	<u>N/A</u>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

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

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 [ICIS-NPDES] (Local Limits/Categorical Standards)
<u>0</u>	<u>0</u>	Self-monitoring requirements [ICIS-NPDES]
<u>0</u>	<u>0</u>	Reporting requirements [ICIS-NPDES]
<u>0</u>	<u>0</u>	Pretreatment compliance schedule [ICIS-NPDES]
<u>0</u>		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [ICIS-NPDES]

## SECTION II: PRETREATMENT PROGRAM ANALYSIS

### J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

YES NO

computerized

hard copy

OTHER:

Are the following files computerized:

YES NO

Control Mechanism Issuance (*Word File*)

Inspection and Sampling schedule (*Word File*)

Monitoring Data (*Operator10 WW Data Management*)

IU Compliance Status Tracking (*Excel File*)

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

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: Illinois River Basin Nutrient Control

Are all records maintained for at least 3 years?

## SECTION II: PRETREATMENT PROGRAM ANALYSIS

K. RESOURCES

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

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

<input checked="" type="checkbox"/>	Legal assistance	
<input checked="" type="checkbox"/>	Permitting	
<input checked="" type="checkbox"/>	IU inspections	
<input checked="" type="checkbox"/>	Sample collection	
<input checked="" type="checkbox"/>	Sample analyses	
<input checked="" type="checkbox"/>	Data analysis, review and response	
<input checked="" type="checkbox"/>	Enforcement	
<input checked="" type="checkbox"/>	Administration (inc. record keeping /data management)	

Does the Control Authority have access to adequate:

YES    NO

If yes then list and if no, explain

<input checked="" type="checkbox"/>	Sampling equipment	<u>3 automated Iscos</u>
<input checked="" type="checkbox"/>	Safety equipment	<u>standard list</u>
<input checked="" type="checkbox"/>	Vehicles	<u>1 Van and 1 pickup truck</u>
<input checked="" type="checkbox"/>	Analytical equipment	<u>conventional equip and flame AA</u>

## SECTION II: PRETREATMENT PROGRAM ANALYSIS

### 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.):  
City has narrative of their P2 program(s). Over the last couple years, the City has worked with a group collecting drugs on DEA National Drug Take Back Days and the County Sheriff installed 2 permanent drug drop boxes for unneeded drugs in Fayetteville.
  
2. Has the source of any toxic pollutants been identified?  
If yes, what was found?  
\_\_\_\_\_
  
3. Has the POTW implemented any kind of public education program? If yes, describe:  
Presentations at local grade schools and university;  
periodic plant tours.
  
4. Does the POTW have any pollution prevention success stories for industrial users documented? Yes. If yes, please attach.
  
5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?  
Yes, permits have required a pollution prevention assessment since 1996
  
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. FAY09  
Industry Address 1901 Borick Drive, 72701  
Industry Description Plating of aluminum wheels for the auto industry  
Industrial Category Metal finishing 40 CFR 433 SIC Code: 3471, 3363, 3479, 3398  
Ave. Total Flow (gpd) 228,000 Ave. Process Flow (gpd) 190,800  
Industry visited during audit: YES

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

FILE #: 2 Industry Name Hiland Dairy File/ID No. FAY05  
Industry Address 301 East 15th St.  
Industry Description Fluid Milk Mfg  
Industrial Category N/A 40 CFR N/A SIC Code: 2026, 2086  
Ave. Total Flow (gpd) 65,500 Ave. Process Flow (gpd) 46,900  
Industry visited during audit: YES

Comments: Source of Minerals

FILE #: 3 Industry Name Tyson File/ID No. FAY07  
Industry Address 2615 South School Ave.  
Industry Description Food Processor  
Industrial Category N/A 40 CFR N/A SIC Code: 2038, 2099  
Ave. Total Flow (gpd) 236,000 Ave. Process Flow (gpd) 175,400  
Industry visited during audit: YES

Comments: Source of Minerals

FILE #: 4 Industry Name Ayrshire File/ID No. FAY15  
Industry Address 1101 South Beechwood Ave.  
Industry Description Electronics  
Industrial Category \_\_\_\_\_ 40 CFR N/A SIC Code: 3672  
Ave. Total Flow (mgd) 5,000 Ave. Process Flow (mgd) <5000 gpd\*  
Industry visited during audit: YES

Comments: Printed Circuit Board Assembly, Testing and Repairing  
\*Industry has batch discharge which flows around 12,110 gpd to POTW

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) 15,000 Ave. Process Flow (gpd) 700  
Industry visited during audit: YES

Comments:



## SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes    N => N    N/A => Not Applicable

	<u>Superior</u>	<u>Hiland</u>	<u>Tyson</u>	<u>Ayrshire</u>	<u>Elkhart</u>
<b>A. <u>Industrial User Characterization</u></b>					
1. Is the IU considered "significant" by the Control Authority?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Is the user subject to categorical pretreatment standards?	<u>Y</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>Y</u>
a. New source or existing source (NS or ES)?	<u>NS</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>ES</u>
b. Is this IU one identified as having P <sup>2</sup> potential?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
<b>B. <u>Control Mechanism</u></b>					
1. Does the file contain an application for a control mechanism?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
If yes, what is the application date?	<u>11/30/07</u>	<u>11/20/09</u>	<u>11/10/09</u>	<u>11/19/07</u>	<u>04/16/08</u>
Does it ask for Pollution Prevention information?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>
2. Does the file contain a Permit?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Permit Expiration Date?	<u>10/31/13</u>	<u>2/28/15</u>	<u>2/28/15</u>	<u>2/28/13</u>	<u>8/31/13</u>
Is a fact sheet included?	<u>Y<sup>1</sup></u>	<u>Y<sup>1</sup></u>	<u>Y<sup>1</sup></u>	<u>Y<sup>1</sup></u>	<u>Y<sup>1</sup></u>

**Comments:**

1. Fact sheet attached to permit; see Tyson Fact Sheet (Attachment B-26/29).
2. CP => "Cover Page" of permit.
3. Part III; Section A; para 8
4. The City has issued a permit to Superior with Categorical standards (see Attachment E-3/4) even though the local limits in the Codes [Title V; Chapter 51; 51.075 (D)] are more stringent; see Attachment J-7/8. The Codes have an exception ("except by permit from the Control Authority"). If the City elects to demonstrate that local limits are not necessary at this time and removes the numerical limits from Chap 51, then the Categorical standards will be appropriate without further justification.
5. The City did not include MAHLs (lbs/day) in Chapter 51 but elected to enact Uniform Concentration limits; therefore, at this time, Ayrshire permit (see Attachment F-2/2) must contain the local concentration-based limits in Chapter 51, equivalent mass limits (based on ave flow) or no limits. The City appears to have allocated the MAIL instead of calculating equivalent mass limits based on average flow. The Department recommends using a BMP for Ayrshire in lieu of numerical local limits. Finally, Ayrshire is not a CIU nor has the City developed local limits for TTOs; nonetheless, the City has included a "40 CFR 433" TTO limit of 2.13 mg/l.
6. Part II; Section C

## SECTION III: INDUSTRIAL USER FILE REVIEW

		<i>Y =&gt; Yes</i>	<i>N =&gt; N</i>	<i>N/A =&gt; Not Applicable</i>		
		<u><i>Superior</i></u>	<u><i>Hiland</i></u>	<u><i>Tyson</i></u>	<u><i>Ayshire</i></u>	<u><i>Elkhart</i></u>
3.	Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a.	Legal Authority Cite?	<u><i>CP<sup>2</sup></i></u>	<u><i>CP<sup>2</sup></i></u>	<u><i>CP<sup>2</sup></i></u>	<u><i>CP<sup>2</sup></i></u>	<u><i>CP<sup>2</sup></i></u>
b.	Expiration date?	<u><i>CP<sup>2</sup></i></u>	<u><i>CP<sup>2</sup></i></u>	<u><i>CP<sup>2</sup></i></u>	<u><i>CP<sup>2</sup></i></u>	<u><i>CP<sup>2</sup></i></u>
c.	Statement of nontransferability?	<u><i>III.A.8<sup>3</sup></i></u>	<u><i>III.A.8<sup>3</sup></i></u>	<u><i>III.A.8<sup>3</sup></i></u>	<u><i>III.A.8<sup>3</sup></i></u>	<u><i>III.A.8<sup>3</sup></i></u>
d.	Appropriate discharge limitations?	<u><i>N<sup>4</sup></i></u>	<u><i>Y</i></u>	<u><i>Y</i></u>	<u><i>N<sup>5</sup></i></u>	<u><i>Y</i></u>
e.	Appropriate self-monitoring requirements?	<u><i>II.C<sup>6</sup></i></u>	<u><i>II.C<sup>6</sup></i></u>	<u><i>II.C<sup>6</sup></i></u>	<u><i>II.C<sup>6</sup></i></u>	<u><i>II.C<sup>6</sup></i></u>
f.	Sampling frequency?	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>
g.	Sampling locations?	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>
h.	Requirement for flow monitoring?	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>
i.	Types of samples (grab or composite) for self-monitoring?	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>	<u><i>I.B</i></u>
j.	Applicable IU reporting requirements?	<u><i>II.C</i></u>	<u><i>II.C</i></u>	<u><i>II.C</i></u>	<u><i>II.C</i></u>	<u><i>II.C</i></u>
k.	Standard conditions for:					
	Right of Entry?	<u><i>IV.A</i></u>	<u><i>IV.A</i></u>	<u><i>IV.A</i></u>	<u><i>IV.A</i></u>	<u><i>IV.A</i></u>
	Records retention?	<u><i>II.B.1</i></u>	<u><i>II.B.1</i></u>	<u><i>II.B.1</i></u>	<u><i>II.B.1</i></u>	<u><i>II.B.1</i></u>
	Civil and Criminal					
	Penalty provisions?	<u><i>III.C.2</i></u>	<u><i>III.C.2</i></u>	<u><i>III.C.2</i></u>	<u><i>III.C.2</i></u>	<u><i>III.C.2</i></u>
	Revocation of permit?	<u><i>III.C.3</i></u>	<u><i>III.C.3</i></u>	<u><i>III.C.3</i></u>	<u><i>III.C.3</i></u>	<u><i>III.C.3</i></u>
l.	Compliance schedules/ progress reports	<u><i>II.C.2</i></u>	<u><i>II.C.2</i></u>	<u><i>II.C.2</i></u>	<u><i>II.C.2</i></u>	<u><i>II.C.2</i></u>
m.	General/Specific Prohibitions?	<u><i>N</i></u>	<u><i>N</i></u>	<u><i>N</i></u>	<u><i>N</i></u>	<u><i>N</i></u>
n.	Where technologically and economically achievable, are P <sup>2</sup> aspect included?	<u><i>I.D.1</i></u>	<u><i>I.D.1</i></u>	<u><i>I.D.1</i></u>	<u><i>I.D.1</i></u>	<u><i>I.D.1</i></u>

## SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes    N => N    N/A => Not Applicable

Superior    Hiland    Tyson    Ayshire    Elkhart

C.    Application of Standards

1. Has the IU been properly categorized?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>N<sup>4</sup></u>	<u>N/A</u>	<u>N/A</u>	<u>N<sup>5</sup></u>	<u>Y</u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>Y<sup>7</sup></u>	<u>Y<sup>7</sup></u>	<u>Y<sup>7</sup></u>	<u>Y<sup>7</sup></u>	<u>Y<sup>7</sup></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>Y</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>Y</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>

D.    Compliance Monitoring Sampling

1. Does the file contain Control Authority sampling results for the industry?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>

Comments:

7. The City conducts annual Industrial Awareness Seminars.

## SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>Y =&gt; Yes</u>	<u>N =&gt; N</u>	<u>N/A =&gt; Not Applicable</u>		
	<u>Superior</u>	<u>Hiland</u>	<u>Tyson</u>	<u>Ayrshire</u>	<u>Elkhart</u>
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
b. Sample date and time?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
c. Sample type?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
d. Wastewater flow at the time of sampling?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
e. Sample preservation procedures?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
f. Chain-of-custody records?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>Y</u>	<u>N/A</u>	<u>N/A</u>	<u>N<sup>8</sup></u>	<u>Y</u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>

Comments:

8. Ayrshire has developed a STOMP (See Attachment I-1/31) to control TTOs. Since Ayrshire is not a 40 CFR 433 CIU, the STOMP is actually a BMP to control TTOs which the City has the authority to do under 40 CFR 403(c)(4). BMPs pre-empt numerical limits. Therefore, the City must remove the "2.13 mg/l" limit from Ayrshire's permit for the two reasons listed here.

9. "B" => Section B in the inspection report (Compliance Evaluation); see Attachment G-3/11.

10. The Inspection Form does not contain a dedicated section for P2 but the CA may include a discussion in the "Follow-UP" section; see Attachment G-11/11.

## SECTION III: INDUSTRIAL USER FILE REVIEW

	<i>Y =&gt; Yes</i>	<i>N =&gt; N</i>	<i>N/A =&gt; Not Applicable</i>		
<u>Inspections</u>	<u>Superior</u>	<u>Hiland</u>	<u>Tyson</u>	<u>Ayshire</u>	<u>Elkhart</u>
7. Does the IU file contain inspection reports?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</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>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
b. Date of last Inspection	<u>12/8/11</u>	<u>12/16/11</u>	<u>12/16/11</u>	<u>12/16/11</u>	<u>12/6/11</u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u>B<sup>9</sup></u>	<u>B<sup>9</sup></u>	<u>B<sup>9</sup></u>	<u>B<sup>9</sup></u>	<u>B<sup>9</sup></u>
b. Inspection date and time?	<u>B</u>	<u>B</u>	<u>B</u>	<u>B</u>	<u>B</u>
c. Name and title of IU official contacted?	<u>B</u>	<u>B</u>	<u>B</u>	<u>B</u>	<u>B</u>
d. Verification of production rates?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>D</u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>E</u>	<u>E</u>	<u>E</u>	<u>E</u>	<u>E</u>
f. Evaluation of pretreatment facilities?	<u>H</u>	<u>N/A</u>	<u>H</u>	<u>N/A</u>	<u>H</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	<u>L</u>	<u>L</u>	<u>L</u>	<u>L</u>	<u>L</u>
i. Manufacturing facilities?	<u>A &amp; D</u>	<u>A &amp; D</u>	<u>A &amp; D</u>	<u>A &amp; D</u>	<u>A &amp; D</u>
j. Chemical handling and storage procedures?	<u>I, J&amp;K</u>	<u>I, J&amp;K</u>	<u>I, J&amp;K</u>	<u>I, J&amp;K</u>	<u>I, J&amp;K</u>
k. Chemical spill prevention areas?	<u>L</u>	<u>L</u>	<u>L</u>	<u>L</u>	<u>L</u>
l. Hazardous waste storage areas and handling procedures?	<u>I, J&amp;K</u>	<u>I, J&amp;K</u>	<u>I, J&amp;K</u>	<u>I, J&amp;K</u>	<u>I, J&amp;K</u>
m. Sampling procedures?	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>
n. Laboratory procedures?	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>
o. Monitoring records?	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>	<u>F</u>
p. Evaluation of Pollution Prevention opportunities?	<u>O<sup>10</sup></u>	<u>O<sup>10</sup></u>	<u>O<sup>10</sup></u>	<u>O<sup>10</sup></u>	<u>O<sup>10</sup></u>
q. Control Authority inspector signature?	<u>Page 1</u>	<u>Page 1</u>	<u>Page 1</u>	<u>Page 1</u>	<u>Page 1</u>

## SECTION III: INDUSTRIAL USER FILE REVIEW

	<i>Y =&gt; Yes</i>	<i>N =&gt; N</i>	<i>N/A =&gt; Not Applicable</i>		
	<u><i>Superior</i></u>	<u><i>Hiland</i></u>	<u><i>Tyson</i></u>	<u><i>Ayshire</i></u>	<u><i>Elkhart</i></u>
<u>IU Self-Monitoring and Reporting</u>					
10. Does the file contain self-monitoring reports?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
11. Does the file include:					
a. BMR?	<u>Y</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>
b. 90-Day Report?	<u>Y</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>
c. All periodic reports?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</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>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
14. Did the IU report flow?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>Y<sup>11</sup></u>	<u>Y<sup>11</sup></u>	<u>Y<sup>11</sup></u>	<u>Y<sup>11</sup></u>	<u>Y<sup>11</sup></u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
b. Did POTW respond to the spill?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

**Comments:**

11. *The City has included slug plans as part of the inspection report; see Section N (Attachment G-9/11).*

## SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes    N => N    N/A => Not Applicable

Superior    Hiland    Tyson    Ayshire    Elkhart

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

Y => Yes    N => N    N/A => Not Applicable

Superior    Hiland    Tyson    Ayshire    Elkhart

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

a. Chronic violations	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
b. TRC	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
c. Pass through/Interference	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
d. Spill/slug loads	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
e. Reporting	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
f. Compliance schedule	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
g. others (specify)	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</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>



SECTION III: INDUSTRIAL USER FILE REVIEW  
**REPORTABLE NONCOMPLIANCE (RNC)**  
**for the Pretreatment Audit Checklist**

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Fayetteville NPDES #: AR0020010  
 Date of Audit: Aug 21-23, 2012 Date entered into QNCR: Sep 4, 2012  
 (ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

**Compliance Monitoring Information**

Compliance Activity Type: Inspection/Evaluation  
 \* State: AR  
 Compliance Monitoring Activity Name: City of Fayetteville AR 0020010  
 If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method:  
 Compliance Monitoring Type: AFO Defined  
 AFO Designation  
 Aerial Photography  
 Audit  
 Audit (IU)

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	AR 0020010			

**Compliance Monitoring Dates**

Planned Start Date: 08/21/2012  
 Actual Start Date: 08/21/2012  
 Planned End Date: 08/23/2012  
 Actual End Date: 08/23/2012

**Statutes and Sections Information**

Federal Statutes: CWA - Clean Water Act  
 \* Programs:  
 NPDES - Post Administrative Penalty Case (Settlement)  
 NPDES - Pretreatment  
 NPDES - Sanitary Sewer Overflow (SSO)  
 NPDES - Section 308 Information Requests  
 NPDES - Sludge/Biosolids  
 State Statute:

\* Compliance Monitoring Action Reason:  
 Agency Priority  
 Citizen Complaint/Tip  
 Core Program  
 For Cause  
 Random Inspection  
 Compliance Monitoring Agency Type:  
 State Contractor  
 State - Using Federal Credential  
 State  
 Regional  
 Other Federal  
 Compliance Monitoring Agency Name:  
 If State, Local or Tribal lead, did EPA Assist?: No  
 Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity?: State  
 If Joint, what was the purpose of the participation of the other party?  
 Which party had the lead?

**Government Contacts**

Affiliation Type	First Name	Last Name	Phone	Office	Organization
SIC Codes:	4952 Sewerage System				
NAICS Codes:					
OECA National Priority:	2009 - (CA Only) - Air Toxics - Flares 2009 - (CA Only) - Air Toxics - LDAR 2009 - (CA Only) - Air Toxics - Surface Coating 2009 - (CA Only) - Financial Assurance 2009 - (CA Only) - MP - Mining				
Regional Priority:	2009 - Region 06 - Air Toxics Major Sources (O & G) 2009 - Region 06 - Brine Spills from Oil & Gas Operations 2009 - Region 06 - CD Implementation 2009 - Region 06 - Minor Wastewater Collection & Treatment System 2009 - Region 06 - Petroleum Refining				

**Media Monitored**  
 Media Monitored:  
 Compliance Monitoring Media Indicator:  
 Multimedia Indicator:  
**Compliance Monitoring Information**  
 Number of Days Physically Conducting Activity: 3  
 Number of Hours Physically Conducting Activity:  
 Compliance Monitoring Action Outcome: No Violations  
 Compliance Monitoring Rating Code: Satisfactory

**Compliance Monitoring Comments**  
 Compliance Monitoring Comments:  
 005: Significant Industries Site Visits Conducted



Special Programs  
Pretreatment

Significant Industrial Users (SIUs)

SIUs:

SIUs Without Control Mechanism:

SIUs Not Inspected:

SIUs Not Sampled:

SIUs in SNC with Pretreatment Standards:

SIUs in SNC with Reporting Requirements:

SIUs in SNC with Pretreatment Schedule:

SIUs in SNC Published in Newspaper:

SIUs on Schedules:

Violation Notices Issued to SIUs:

Administrative Orders Issued to SIUs:

Civil Suits Filed Against SIUs:

Criminal Suits Filed Against SIUs:

Local Limits

Date of Most Recent Technical Evaluation for Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

POLLUTANTS

Removal Credits

Removal Credits Application Status:

Date of Most Recent Removal Credits Approval:

Removal Credits:

POLLUTANTS

Categorical Industrial Users (CIUs)

CIUs:

CIUs in SNC:

Acceptance of Waste

Acceptance of Hazardous Waste:

Acceptance of Non-Hazardous Industrial Waste:

Acceptance of Hauled Domestic Wastes:

Penalties

Dollar Amount of Penalties Collected: \$

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

Deficiencies

Deficiencies Identified During IU File Review:

Control Mechanism Deficiencies:

Legal Authority Deficiencies:

Deficiencies in Data Management and Public Participation:

Deficiencies in Interpretation and Application of Pretreatment Standards:

Inadequacy of Sampling and Inspections:

Adequacy of Pretreatment Resources:

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Violation of IU Schedule for Remedial Measures:

Formal Response to Violation of IU Schedule for Remedial Measures:

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling:

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

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Control Authority: City of Fayetteville NPDES #: AR0020010

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

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

Date/Time of visit: August 22, 2012 @ 8:30 am

Industry contacts: Lynn Pate - Corp Environmental Mgr  
Bill Koch - Environmental Technician

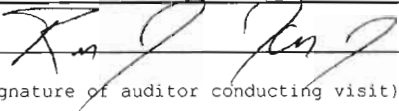
	Yes	No	N/A
1. Significant industrial user?	<u>✓</u>	_____	_____
2. Classified correctly?	<u>1</u>	_____	_____
3. Pretreatment equipment or procedures?	<u>✓</u>	_____	_____
4. Pretreatment equipment maintained and operational?	<u>✓</u>	_____	_____
5. Hazardous waste generated or stored?	<u>✓</u>	_____	_____
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>	_____	_____

Comments:

*1. The City was to place confirmation in Superior's pretreatment file that 40 CFR 464 wastewater does not enter and will not enter the POTW.*

Visit conducted by: Torrence/Georgiou

Date: 9-10-12

  
\_\_\_\_\_  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Control Authority: City of Fayetteville NPDES #: AR0020010

Industry name: Superior

Additional comments:

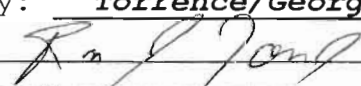
*Superior (User) performs a non-chrome coating operation on this site which falls under 40 CFR 433.*

*This User also performs aluminum die casting on site. The User melts ingots in furnaces and pours the molten metal into dies to form the rough cast wheel.*

*Pretreatment consists of oil skimming. Most of the wastewater generated at this time comes from the clean/rinse waters from the post-polishing operations.*

Visit conducted by: Torrence/Georgiou

Date: 9-10-12

  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Control Authority: City of Fayetteville NPDES #: AR0020010

Name, address and phone number of industry:

Hiland Dairy Foods 301 East 15<sup>th</sup> Street 72701

(479) 521-1707 dschoen@hilanddairy.com

Type of industry: Bottling Milk and Fruit Juices

Date/Time of visit: August 23, 2012 @ 10:00 am

Industry contacts: Ray Arnold - QAQC Manager

Dale Schoen - Plant Manager

	Yes	No	N/A
1. Significant industrial user?	<u>✓</u>	_____	_____
2. Classified correctly?	<u>✓</u>	_____	_____
3. Pretreatment equipment or procedures?	_____	<u>1</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>	_____	_____

Comments:

1. *Currently, Hiland has no procedures in place to control TDS (1410 mg/l) entering the POTW.*

Visit conducted by: Torrence/Georgiou

Date: 9-18-12

\_\_\_\_\_  
(signature of auditor conducting visit)

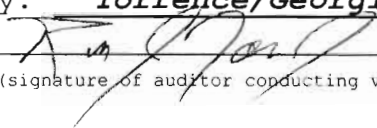
SECTION III: INDUSTRIAL USER FILE REVIEW  
**PRETREATMENT AUDIT**  
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)  
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Fayetteville NPDES #: AR0020010  
Industry name: Hiland

Additional comments:

2. *Hiland loses about ½% of milk entering the facility. Most of the lost milk enters the POTW.*
3. *Hiland processes about 400,000 gallons per week of milk.*
4. *Hiland is encourages to develop a BMP to control TDS entering the POTW which may consist of capturing truck wash and pre-rinse wastewater.*

Visit conducted by: Torrence/Georgiou Date: 9-10-12

  
\_\_\_\_\_  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Control Authority: City of Fayetteville NPDES #: AR0020010

Name, address and phone number of industry:

Tyson Foods, Inc. 2615 South School 72701

Type of industry: Food Processor: Chips and Tortillas

Date/Time of visit: August 23, 2012 @ 11:30 am

Industry contacts<sup>1</sup>: Richard Stockton - Refrigeration Supt  
(479) 757-7828 richard.stockton@tyson.com  
Ben Gasca, Plant Manager  
(479) 521-0677 ben.gasca@tyson.com

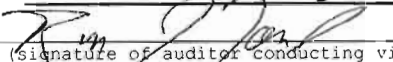
	Yes	No	N/A
1. Significant industrial user?	<u>✓</u>	<u>    </u>	<u>    </u>
2. Classified correctly?	<u>✓</u>	<u>    </u>	<u>    </u>
3. Pretreatment equipment or procedures?	<u>    </u>	<u>  2  </u>	<u>    </u>
4. Pretreatment equipment maintained and operational?	<u>✓</u>	<u>    </u>	<u>    </u>
5.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

Comments:

1. Other Tyson employees present for the pre-inspection meeting were:  
Michael Terry, Env. Area Mgr. (479) 290-7238  
Carla Bray, Complex Env Mgr. (479) 986-3216

Visit conducted by: Torrence/Georgiou

Date: 9-10-12

  
(signature of auditor conducting visit)



SECTION III: INDUSTRIAL USER FILE REVIEW  
**PRETREATMENT AUDIT**  
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)  
INDUSTRIAL SITE VISIT (CONTINUED)

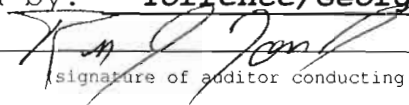
Control Authority: City of Fayetteville NPDES #: AR0020010  
Industry name: Tyson

Additional comments:

2. Presently, Tyson has no procedures in place to control TDS (3100 mg/l) entering the POTW.
  
3. Tyson is encouraged to implement a BMP to control food particles entering the POTW.

Visit conducted by: Torrence/Georgiou

Date: 9-10-12

  
\_\_\_\_\_  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

**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: 40 CFR 468 - Mfg. Cu tubing & fittings

Date/Time of visit: August 23, 2012 @ 2:00 pm

Industry contacts: Rob Baily - Tube Mill & Environmental Mgr  
(479) 443-2368 rob.bailey@elkhartproducts.com

Flint Green QA Tech and WWT Operator  
(479) 643-2580

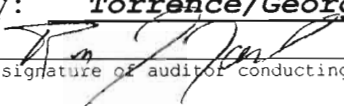
	Yes	No	N/A
1. Significant industrial user?	<u>✓</u>	<u>    </u>	<u>    </u>
2. Classified correctly?	<u>1</u>	<u>    </u>	<u>    </u>
3. Pretreatment equipment or procedures?	<u>✓</u>	<u>    </u>	<u>    </u>
4. Pretreatment equipment maintained and operational?	<u>✓</u>	<u>    </u>	<u>    </u>
5. Hazardous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

Comments:

**1. Elkhart has both 40 CFR 464 and 468 operations but the City regulates the User as a Copper Former only.**

Visit conducted by: Torrence/Georgiou

Date: 9-10-12

  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW  
**PRETREATMENT AUDIT**  
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)  
INDUSTRIAL SITE VISIT (CONTINUED)

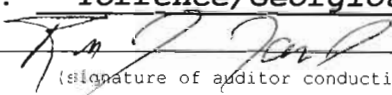
Control Authority: City of Fayetteville NPDES #: AR0020010  
Industry name: Elkhart

Additional comments:

*Elkhart melts 500 lb copper plates to cast, form and draw copper tubing. If no wastewater (that enters or will enter the POTW) is associated with the Copper Casting operations, the City may continue to consider only copper forming operations when calculating allowable limits for this User.*

Visit conducted by: Torrence/Georgiou

Date: 9-10-12

  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Control Authority: City of Fayetteville NPDES #: AR0020010

Name, address and phone number of industry:  
Ayrshire Electronics Arkansas 1101 S Beechwood Ave 72701

Type of industry: Printed Circuit Board Assembly

Date/Time of visit: August 23, 2012 @ 3:30 pm

Industry contacts: Tim Pearce - VP of Engineering  
(479) 684-2313 tpearce@ayrshireusa.com

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

Comments:

**The boards are manufactured off-site, soldered and assembled.**

Visit conducted by: Torrence/Georgiou

Date: 9-10-12

  
(signature of auditor conducting visit)

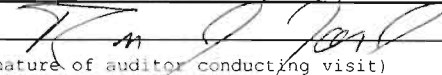
SECTION III: INDUSTRIAL USER FILE REVIEW  
**PRETREATMENT AUDIT**  
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)  
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Fayetteville NPDES #: AR0020010  
Industry name: Ayrshire

Additional comments:

*In accordance with 40 CFR 403.3(v)(3), the City may consider Ayrshire as a Non-Significant Industrial User (Non-SIU). Non-SIUs can be permitted by the City but must not be listed as a SIU in annual reports to the Approval Authority.*

Visit conducted by: Torrence/Georgiou Date: 9-16-12

  
\_\_\_\_\_  
(signature of auditor conducting visit)

City of Fayetteville  
Wastewater Survey Questionnaire - Long Form

For Office Use Only  
No. TYS2009  
Use as application  Y  N

1. Company Name: Tyson Foods, Inc. - Tyson of Fayetteville  
Mailing Address: 2615 S. School Street Fayetteville 72701  
Telephone: 479-521-0677

2. Address of Facility (if same as above, check ):  
\_\_\_\_\_  
\_\_\_\_\_  
Telephone: (if same as above, check ): \_\_\_\_\_

3. Contact Person: RICHARD STOCKTON  
Title: REFRIGERATION MGR. Telephone: 479-718-0620  
Email: RICHARD.STOCKTON@TYSON.COM

4. Operator(s): TYSON FOODS, INC.

5. Owner(s): TYSON FOODS, INC.

6. Identify type of business conducted or product(s) manufactured:  
FOOD PROCESSING OF MEXICAN CORN AND FLOUR TORTILLAS AND CHIPS.  
MANUFACTURING MEAL KITS FOR RETAIL CONSUMPTION.

7. Does this company have an industrial waste discharge permit with the City of Fayetteville or has it had one previously? Check one:  Yes  No

If yes, permit number/expiration date: FAY07 / FEB. 28, 2010

8. List other discharge or environmental permits (NPDES, Air, etc.): NPDES - GENERAL  
STORMWATER PERMIT / CESQG - HAZARDOUS WASTE - STATE / EPA  
10

9. Standard Industrial Classification (SIC) Code Number(s) and Classification(s):  
2099, 2038

- Process discharge is  batch  continuous  both.  
If both, \_\_\_\_\_ % batch \_\_\_\_\_ % continuous.  
Average number of batches per 24-hour day \_\_\_\_\_

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

1<sup>ST</sup> SHIFT - 7am - 3pm - 298 TEAM MEMBERS

2<sup>ND</sup> SHIFT - 3pm - 11pm - 183 TEAM MEMBERS; 3<sup>RD</sup> SHIFT - 11pm - 7am  
170 TEAM MEMBERS

18. Describe hours of operation of actual or proposed pretreatment facility. Specify discharge hours.

24 HOURS A DAY / SEVEN DAYS A WEEK / 365 DAYS A YEAR

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

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

REMOVING POST PAST LINE AND OVEN LINE - THIS WILL

ELIMINATE THE MEAL KITS - ESTIMATED TIMELINE IS FEB. 2010

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

**Industrial Categories**

- Adhesives
- Aluminum Forming
- Auto & Other Laundry
- Battery Manufacturing
- Coal Mining
- Coil Coating
- Copper Forming
- Electrical/Electronic Components
- Electroplating
- Explosives Manufacturing
- Foundries
- Gum & Wood Chemicals
- Inorganic Chemicals
- Iron and Steel Manufacturing

**Other Business Activities**

- Animal/Vegetable Fats/Oils Blending
- Asbestos Manufacturing
- Auto Garage/Repair
- Beverage Bottler
- Breads/Baked Goods Mfg.
- Brewery/Winery
- Builder's Paper
- Carbon Black
- Car Wash/Transport Truck Wash
- Cement Manufacturing
- Dairy Products Processing
- Feedlots
- Ferroalloy Manufacturing
- Fertilizer Manufacturing

**Industrial Categories**

- Leather Tanning and Finishing
- Mechanical Products
- Metal Finishing
- Metal Products & Machinery
- Nonferrous Metals
- Ore Mining
- Organic Chemicals
- Paint & Ink
- Pesticides
- Petroleum Refining
- Pharmaceuticals
- Photographic Supplies
- Plastic & Synthetic Materials
- Plastics Processing
- Porcelain Enameling
- Printing & Publishing
- Pulp and Paper
- Rubber Processing
- Soaps/Detergents Mfg.
- Steam Electric
- Textile Mills
- Timber Products Mfg.

**Other Business Activities**

- Fruits and Vegetables
- Glass Manufacturing
- Grain Mills Manufacturing
- Hospital/Health Care
- Ink Formulating
- Meat Processing
- Metal Molding and Casting
- Paint and Body Shop
- Paint Formulating
- Phosphate Manufacturing
- Paving and Roofing (Tars and Asphalt)
- Poultry Processing
- Radiator Shop
- Rendering
- Slaughter/Meat Packing
- Seafood Processing
- Sugar Processing
- Other Food/Edible Products Processor

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

- Air flotation
- Biological treatment
- Centrifuge
- Chemical precipitation
- Chlorination
- Cyclone
- Filtration
- Flow equalization
- Grease or oil separation
- Grease trap
- Grit removal
- Ion exchange
- Neutralization/pH correction
- Ozonation
- Rainwater diversion or storage
- Reverse Osmosis
- Screen
- Sedimentation
- Septic tank
- Solvent separation

Describe: \_\_\_\_\_

Describe: \_\_\_\_\_

Frequency of cleaning: \_\_\_\_\_

Describe: \_\_\_\_\_

Describe: \_\_\_\_\_



- Sump
- Other chemical treatment Describe: \_\_\_\_\_
- Other physical treatment Describe: \_\_\_\_\_
- Other Describe: \_\_\_\_\_
- No pretreatment provided.

Other remarks as needed to describe any of the above:

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22. If any wastewater analyses have been performed on the wastewater discharge(s) from your facilities, attach a copy of the most recent data to this questionnaire. Include the date of the sample collection and analysis, name of laboratory performing the analysis, and location(s) from which samples(s) were taken (attach sketches, plans, etc., as necessary).
23. Are any liquid wastes or sludges from this facility disposed of by means other than discharge to the POTW collection system? Check one:  yes  no

If yes, these wastes may be best described as:

Estimated gallons/pounds per year (specify)

- Acids and alkalis \_\_\_\_\_
- Heavy metal sludges \_\_\_\_\_
- Inks/dyes 25 GAL/YR
- Non-petroleum oil and/or grease COOKING OIL - NONC FY09
- Organic compounds \_\_\_\_\_
- Paints 506 GAL/YR.
- Pesticides \_\_\_\_\_
- Petroleum oil and/or grease 1000 GAL/YR.
- Plating wastes \_\_\_\_\_
- Pretreatment sludges \_\_\_\_\_
- Radiator fluid wastes \_\_\_\_\_
- Solvents/thinners \_\_\_\_\_
- Other hazardous wastes  
Specify: FFA Residue 30 GAL/YR.
- Other non-hazardous wastes  
Specify: UNIVERSAL WASTE 173 lbs/YR.

For the above checked wastes, does your company practice:

on-site storage. Describe: USED OIL TANK; HAZAROUS WASTE ROOM

off-site storage. Describe: \_\_\_\_\_

on-site disposal. Describe: \_\_\_\_\_

off-site disposal. Describe: RINECO, LAMP TRACKER, USED OIL SERVICES

24. Is there an Accidental Spill/Slug Prevention Plan prepared for this facility?

Check one:  yes  no If yes, attach a copy to this application.

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

Item No.	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present	Max Daily Concentration
1	ammonia				X	
2	asbestos (fibrous)	X				
3	cyanide (total)	X				
4	antimony (total)	X				
5	arsenic (total)	X				
6	beryllium (total)	X				
7	cadmium (total)	X				
8	chromium (total)	X				
9	copper (total)	X				
10	lead (total)	X				
11	mercury (total)	X				
12	nickel (total)	X				
13	selenium (total)	X				
14	silver (total)	X				
15	thallium (total)	X				
16	zinc (total)	X				
17	acnaphthene	X				
18	acnaphthylene	X				
19	acrolein	X				
20	acrylonitrile	X				
21	aldrin	X				
22	anthracene	X				
23	benzene	X				
24	benzidine	X				
25	benzo(a)anthracene	X				
26	benzo(a)pyrene	X				
27	benzo(b)fluoranthene	X				
28	benzo(g,h,i)perylene	X				
29	benzo(k)fluoranthene	X				
30	a-BHC(alpha)	X				
31	b-BHC(beta)	X				
32	d-BHD(delta)	X				
33	g-BHC(gamma)	X				
34	bis(2-chloroethyl)ether	X				
35	bis(2-chloroethoxy)methane	X				
36	bis(2-chloroisopropyl)ether	X				
37	bis(chloromethyl)ether	X				

Item No.	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present	Max Daily Concentration
38	bis(2-ethylhexyl)phthalate	X				
39	bromodichloromethane	X				
40	bromoform	X				
41	bromomethane	X				
42	4-bromophenylphenyl ether	X				
43	butylbenzyl phthalate	X				
44	carbon tetrachloride	X				
45	chlordane	X				
46	4-chloro-3-methylphenol	X				
47	chlorobenzene	X				
48	chloroethane	X				
50	chloroform	X				
51	chloromethane	X				
52	2-chloronaphthalene	X				
53	2-chlorophenol	X				
54	4-chlorophenylphenyl ether	X				
55	chrysene	X				
56	4,4'-DDD	X				
57	4,4'-DDE	X				
58	4,4'-DDT	X				
59	dibenzo(a,h)anthracene	X				
60	dibromochloromethane	X				
61	1,2-dichlorobenzene	X				
62	1,3-dichlorobenzene	X				
63	1,4-dichlorobenzene	X				
64	3,3-dichlorobenzidine	X				
65	dichlorodifluoromethane	X				
66	1,1-dichloroethane	X				
67	1,2-dichloroethane	X				
68	1,1-dichloroethene	X				
69	trans-1,2-dichloroethene	X				
70	2,4-dichlorophenol	X				
71	1,2-dichloropropane	X				
72	(cis & trans) 1,3-dichloropropene	X				
73	dieldrin	X				
74	diethyl phthalate	X				
75	2,4-dimethylphenol	X				
76	dimethyl phthalate	X				
77	di-n-butyl phthalate	X				
78	di-n-octyl phthalate	X				
79	4,6-dinitro-2-methylphenol	X				
80	2,4-dinitrophenol	X				
81	2,4-dinitrotoluene	X				
82	2,6-dinitrotoluene	X				
83	1,2-diphenylhydrazine	X				
84	endosulfan I	X				
85	endosulfan II	X				
86	endosulfan sulfate	X				
87	endrin	X				
88	endrin aldehyde	X				
89	ethylbenzene	X				
90	fluoranthene	X				
91	fluorene	X				
93	heptachlor epoxide	X				
94	hexachlorobenzene	X				
95	hexachlorobutadiene	X				
96	hexachlorocyclopentadiene	X				
97	hexachloroethane	X				
98	indeno (1,2,3-d)pyrene	X				
99	isophorone	X				
100	methylene chloride	X				
101	naphthalene	X				

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Item No.	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present	Max Daily Concentration
102	nitrobenzene	X				
103	2-nitrophenol	X				
104	4-nitrophenol	X				
105	n-nitrosodimethylamine	X				
106	n-nitrosodipropylamine	X				
107	n-nitrosodiphenylamine	X				
108	PCB-1016	X				
109	PCB-1221	X				
110	PCB-1232	X				
111	PCB-1242	X				
112	PCB-1248	X				
113	PCB-1254	X				
114	PCB-1260	X				
115	pentachlorophenol	X				
116	phenanthrene	X				
117	phenol	X				
118	pyrene	X				
119	2,3,7,8-tetrachlorodibenzo-p-	X				
120	1,1,2,2-tetrachloroethane	X				
121	tetrachloroethane	X				
122	toluene	X				
123	toxaphene	X				
124	1,2,4-trichlorobenzene	X				
125	1,1,1-trichloroethane	X				
126	1,1,2-trichloroethane	X				
127	trichloroethene	X				
128	trichlorofluoromethane	X				
129	2,4,6-trichlorophenol	X				
130	vinyl chloride	X				

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

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

Signed: Date: 11-2-09 Signature: Ben Gasco

Name/Title: 11-3-09<sup>PM</sup> Plant Manager

Certified: Date: 11-10-09 Signature: [Signature]

Name/Title: Sc. Environmental Manager

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

**CITY OF FAYETTEVILLE, ARKANSAS  
INDUSTRIAL WASTE DISCHARGE PERMIT**

**PERMIT NO. FAY07**

The Tyson Foods, Inc. - Tyson of Fayetteville facility has been classified as a significant industrial user because of an average process discharge of 25,000 gallons per day or more, organic loading, and the reasonable potential for adversely affecting the POTW's operation. In compliance with the provisions and conditions of the Discharge and Pretreatment Regulations in Chapter 51 of the Fayetteville Code, and with any applicable provisions of local, federal or State of Arkansas laws or regulations,

**Tyson Foods, Inc.**  
2615 S. School  
Fayetteville, Arkansas 72701,

hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC Nos. 2038 and 2099 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.

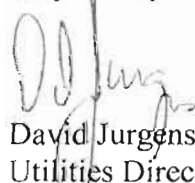
Noncompliance with any term or condition of this permit shall constitute a violation of the Fayetteville Code.

This permit shall become effective on **March 1, 2010** and authorization to discharge shall expire at midnight on **February 28, 2015**. 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 24<sup>th</sup> day of February, 2010

Approved By: **City of Fayetteville**

  
David Jurgens, P.E.  
Utilities Director

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

**SECTION A. WASTESTREAM LOCATIONS**

Location TYS001

This wastestream shall consist of process and cleanup wastewaters. The permitted point of discharge is the 3" Parshall flume in the waste building located north of the freezer plant. The quality of effluent discharged from Location TYS001 shall, at a minimum, meet the limitations set forth in Part I, Section B, Table I-1 of this permit.

**SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS**

The following limitations and monitoring requirements shall apply to discharge from **Location TYS001** except for flow usage, which applies as specified in the Table I-1 footnotes. The Permittee shall monitor the discharge from **Location TYS001**, and the incoming water usage, and shall be limited as specified below:

Table I-1						
Parameter	LIMITATIONS <sup>1</sup>				MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average <sup>2</sup>		Frequency <sup>3</sup>	Sample Type
	(mg/l)	(lb./day)	(mg/l)	(lb./day)		
Biochemical Oxygen Demand (BOD <sub>5</sub> )	Report	Report	Report	Report	3/week	24-hr composite
Oil & Grease	Report	Report	Report	Report	1/week	Grab
Phosphorus, Total	Report	Report	Report	Report	1/week	24-hr composite
Total Suspended Solids (TSS)	Report	Report	Report	10,445	3/week	24-hr composite
pH	(4)		NA		1/day	Grab
Flow, Usage <sup>5</sup>	Report		Report		Continuous	Totalizer <sup>6</sup>
Flow, Discharge	Report		Report		Continuous	Totalizer <sup>6</sup>

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

<sup>2</sup> Monthly average is the average of all daily results in a calendar month regardless of the number of samples analyzed.

<sup>3</sup> Week means Sunday through Saturday. Month means calendar month. The date and time of an individual grab sample is the date and time at which the sample is collected. The date of a composite sample is the date on which sample collection for the composite sample is started and stopped. The composite sample

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date will be one day if the composite sample is collected on one day, e.g. April 14, 2007, or two days if the composite sample is collected over two days, e.g. April 14-15, 2007. Monitoring by the Control Authority is not a substitute for monitoring required to be conducted by the Permittee in this permit unless the Control Authority notifies the Permittee in writing that specific monitoring by the Control Authority can be used to meet permit frequency requirements.

<sup>4</sup> Within the range 5.0 to 12.5 standard units.

<sup>5</sup> Usage flow (incoming water) shall be measured at the city water meter in the field outside the fence on the west side of the freezer plant.

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

## **SECTION C. COMPLIANCE SCHEDULE**

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

## **SECTION D. OTHER SPECIFIC REQUIREMENTS**

### **1. Pollution Prevention**

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

### **2. Specific Reopener Clause**

This permit may be reopened to determine BOD<sub>5</sub> and/or TSS loading limits when the daily BOD<sub>5</sub> loading exceeds 9,500 pounds per day for more than 2 days per month for two consecutive months or the BOD<sub>5</sub> monthly average exceeds 6,400 pounds per day for 2 consecutive months.

### **3. Accidental Spill/Slug Prevention Plan Requirement**

The Permittee is required to have an Accidental Spill/Slug Prevention Plan in accordance with Part IV, Section C.

### **4. Toxic Organic Management Plan Requirement**

The Permittee is not required to have a Toxic Organic Management Plan.

**PART II - STANDARD MONITORING, RECORD KEEPING & REPORTING REQUIREMENTS**

**SECTION A. MONITORING**

**1. Monitoring by Approved Methods**

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

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

**2. Sampling Facility and Monitoring Equipment**

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

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

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

**3. Representative Sampling**

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

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

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

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

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

## **5. Flow Measurement Devices and Method**

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

## **SECTION B. RECORD KEEPING**

### **1. Retention of Records**

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

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

### **2. Record Contents**

Records and monitoring information shall include:

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

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

### **3. Manifest of Wastes Removed**

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

### **4. Duty to Provide Information**

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

### **5. Availability of Data**

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

## **SECTION C. REPORTING**

### **1. Discharge Monitoring Report**

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

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

- k. Daily flow for wastewater discharge on all monitoring days, and average daily and total monthly flow for water usage and wastewater discharge and units;
- l. Compliance statement;
- m. TTO certification statement if a TOMP plan has been approved:  
"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority."
- n. Certification statement:  
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
- o. Signature of authorized signatory (See Attachment A).

## 2. Compliance Schedule Reporting

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

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

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

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

## 3. Averaging Measurements and Detection Limits

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

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

**4. Notification of Unusual Loadings**

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

**5. Planned Changes**

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

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

**6. Notification of Shutdown**

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

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

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

**7. Anticipated Noncompliance**

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

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

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

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

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

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

#### **9. Other Noncompliance**

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

#### **10. Certification in Lieu of Monitoring**

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

#### **11. Signatory Requirements**

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

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

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



*violations.*

**12. Address for Report Submissions**

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

CH2M HILL  
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. Limitations on Permit Transfer**

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

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

## **9. Duty to Reapply**

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

## **10. Continuation of Expired Permits**

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

## **SECTION B. OPERATION AND MAINTENANCE**

### **1. Proper Operation and Maintenance**

The Permittee shall at all times maintain in good working order and operate as efficiently as

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

**2. Need to Halt or Reduce Not a Defense**

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

**3. Duty to Mitigate**

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

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

**4. Bypass of Treatment System**

Bypass of the treatment system is prohibited, unless:

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

**5. Affirmative Defense**

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

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

- a. An upset occurred and that the Permittee can identify the specific cause of the upset;
- b. The permitted facility was at the time being properly operated; and
- c. The Permittee submitted notice of the upset as required.

#### **6. Removed Substances and RCRA Requirements**

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

#### **7. Disposal of Sludges and Spent Chemicals**

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

#### **8. Emergency Action**

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

#### **9. Dilution Not Permitted**

The Permittee shall not increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

### **SECTION C. RESULTS OF NONCOMPLIANCE**

#### **1. Duty to Comply**

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

#### **2. Penalties for Violations of Permit Conditions**

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

### **3. Permit Suspension, Revocation and Termination**

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

### **4. Tampering**

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

### **5. Falsification of Reports**

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

### **6. Publication in Newspaper for Significant Noncompliance**

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

- a. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent or more of all of the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter;
- b. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH);
- c. Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the Control Authority determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public);
- d. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of this section to halt or prevent such a discharge;

- e. Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;
- f. Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- g. Failure to accurately report noncompliance;
- h. Any other violation or group of violations which the Control Authority determines will adversely affect the operation or implementation of the local pretreatment program.

## **7. Civil and Criminal Liability**

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

## **PART IV - OTHER REQUIREMENTS**

### **SECTION A. RIGHT OF ENTRY**

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

1. To enter upon the Permittee's premises where a real or potential discharge is located or records are required to be kept under the terms and conditions of this permit;
2. To have access to and copy records required to be kept under the terms and conditions of this permit; to inspect any facility, materials storage or monitoring equipment; to observe monitoring practices, process or facility operations; to sample any discharge; and
3. Where the Permittee has security measures in force which require proper identification and/or clearance before entry onto said Permittee's premises is granted, such Permittee shall make the necessary arrangements with the security guards that upon presentation of proper identification, the IPC shall be permitted to enter without delay. The Industrial Pretreatment Coordinator shall have access to production, materials storage, and wastewater pretreatment areas as well as operating, monitoring, and pretreatment records of the Permittee Plant. Access shall be granted immediately upon request at any time deemed necessary provided proper identification is provided by the entrant.

### **SECTION B. BOILER SYSTEM**

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

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

### **SECTION C. ACCIDENTAL SPILL/SLUG PREVENTION PLAN**

If the Permittee is required to have one, an Accidental Spill/Slug Prevention Plan (ASPP) shall be developed and submitted for approval. The Permittee shall notify the POTW immediately of any changes at its facility affecting potential for a slug discharge.

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

At a minimum, the ASPP must address the following:



1. Description of discharge practices, including non-routine batch discharges;
2. Description of stored chemicals;
3. Procedures for immediately notifying the POTW of slug discharges or spills, including any discharge that would violate a prohibition under 40 CFR 403.5(b) with procedures for follow-up written notification within five days;
4. If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response;

The ASPP must provide for notification of slug discharges or 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:

CH2M HILL  
(Paul R. Noland Wastewater Treatment Facility)  
1400 N. Fox Hunter Road  
Fayetteville, Arkansas 72701

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

**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, which has a reasonable potential to cause interference or pass through, or in any other way violate the POTW's regulations, local limits or permit conditions.
- 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 - CH2M HILL AUTHORIZATION**

CH2M HILL Engineers, Inc. (CH2M HILL) 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 CH2M HILL will be the authorized representative of the City of Fayetteville.

**ATTACHMENT A - SIGNATORY AUTHORIZATION**

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

- (1) A responsible corporate officer, if the industrial user is a corporation; a responsible corporate officer means (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;
- (2) A general partner or proprietor if the industrial user is a partnership or sole proprietorship respectively; or
- (3) A duly authorized representative of the individual designated in (1) or (2) of this definition if (i) the authorization is made in writing by the individual described in (1) or (2) of this definition, and (ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company, and (iii) the written authorization is submitted to the Control Authority.

**Authorized Signatory**

\_\_\_\_\_  
Effective Date

\_\_\_\_\_  
**Authorized Signatory Name (Print)**

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Title

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

\_\_\_\_\_  
Name (Print)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Authorization Revoked by:

\_\_\_\_\_  
Signature of a Current Authorized Signatory

\_\_\_\_\_  
Date Revoked

B-25/29

<b>Fact Sheet for Tyson Foods, Inc.</b>			
<b>Part I. Industry Specific Information</b>			
<b>A1.</b>	<b>Company Name, Facility Address, Telephone</b>	<b>A2.</b>	<b>Company Name, Mailing Address</b>
	Tyson Foods, Inc. - Tyson of Fayetteville 2615 S. School Fayetteville, AR 72701 479-521-0677		Tyson Foods, Inc. - Tyson of Fayetteville 2615 S. School Fayetteville, AR 72701
<b>B1.</b>	<b>Primary Contact Name, Title, Telephone, Fax, E-mail</b>		
	Richard Stockton, Refrigeration Manager, 479-718-0620 Tele, 479-521-2206 Fax, Richard.Stockton@Tyson.com		
<b>B2.</b>	<b>Secondary Contact Name, Title, Telephone, Fax, E-mail</b>		
	Brad Walker, Maintenance Engineer, 479-521-0677 Tele, 479-521-2206 Fax, Brad.Walker@Tyson.com		
<b>C1.</b>	<b>Company Owner</b>	<b>C2.</b>	<b>Company Operator</b>
	Tyson Foods, Inc.		Tyson Foods, Inc.
<b>D1.</b>	<b>SIC Code(s) and Description</b>	<b>D2.</b>	<b>Categorical Determination</b>
	2038 (Frozen specialties) 2099 (Food prep.)		CIU: Non-categorical SIU: Flow, BOD Loading, pH potential New Source Determination Date: NA, non-categorical New Source, Existing Source
<b>D3.</b>	<b>Description of Operations</b>	<b>D4.</b>	<b>Production Data</b>
	Food Processing of Mexican corn and flour tortillas and chips. Manufacturing frozen meal kits for retail consumption. Cooking & grinding of corn; forming & baking of product. Blending of flour & water; forming & baking of product. Produce meal kits. Cook poultry as component. Plan to eliminate meal kits Feb 2010.		3.5 Million pounds per week.
<b>D5.</b>	<b>Description of Existing Pollution Abatement Facilities</b>	<b>D6.</b>	<b>Description of Existing Pollution Abatement Programs</b>
	Solids screening at plant floor trenches, in the onsite Tyson pump station, and at the wastewater building drain and rotating fine screen before discharge.		Screenings and condemned foods are removed and used for pet & chicken food. Some tortilla waste reprocessing. Tortilla waste solids to Tyson River Valley Byproducts. Medical waste is hauled off. Bulbs, aerosols, & waste oil are hauled off. Emergency Action Plan contains Spill Plan. Ammonia is addressed in their Process Safety Management Program.

<b>E. Effluent Limitations</b>						
<b>E1. Categorical Limitations</b>				<b>E2. Local Limitations</b>		
NA (Non-categorical)				These are not applied to permitted Significant Industrial Users.		
	Parameter	Daily Max	Monthly Avg		Parameter	Instantaneous Max mg/l
					As	0.68
					Cd	0.02
					Cr	0.48
					Cu	0.23
					CN	0.01
					Pb	0.15
					Hg	0.0002
					Ni	0.2
					Ag	1.23
					Zn	1.52
<b>E3. Allocations (MAHL calc from design. MAIL Mass allocation.)</b> Limits are in lb./day				<b>E4. Other Limitations (specify, such as performance based, State limits, etc.):</b>		
	Parameter	Monthly Average		pH 5-12.5 from ordinance prohibition in 51.075(B)(2)(b).		
	TSS	10,445				
<b>E5. Rate &amp; frequency of discharge; avg. &amp; max. daily flow</b>						
Location TYS001 Avg. daily discharge = 0.280 MG Max daily discharge = 0.471 MG Max monthly average discharge = 0.359 MG						
Estimated discharge in 5 years (2014): 0.300 MGD						
<b>E6. Discharge Location(s) – Location designation, description of discharge, specific location, and where to sample</b>						
Location TYS 001. This wastestream shall consist of process and cleanup wastewaters. The permitted point of discharge is the 3" Parshall flume in the waste building located north of the freezer plant. The quality of effluent discharged from Location TYS001 shall, at a minimum, meet the limitations set forth in Part E7 & E8 below.						
<b>E7. Permit Limitations &amp; Monitoring Requirements (indicate which limitations above, &amp; each of the permit limits below are based on and indicate units)</b>						
<b>E8.</b> Rationale for selecting limits below: selected most stringent. Rationale for monitoring frequencies below: EPA guidance, history, POTW needs						

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Location TYS001						
Parameter	Daily Max mg/l	Daily Max lb./day	Monthly Avg. mg/l	Monthly Avg. lb./day	Monitoring Frequency	Sample Type
BOD5	Report	Report	Report	Report	3/week	24-hour comp
O&G	Report	Report	Report	Report	1/week	Grab
Phos	Report	Report	Report	Report	1/week	24-hour comp
TSS	Report	Report	Report	10,445	3/week	24-hour comp
pH	(*)	NA	NA	NA	1/day	Grab
Flow, Use	Report	Report	Report	Report	Continuous	Totalizer
Flow, Eff	Report	Report	Report	Report	Continuous	Totalizer
(*) 5-12.5 S.U.						
<b>E9.</b>	<b>Reporting Requirements</b>					
	Once per month a summary of monitoring data is required for the previous calendar month. Other standard reporting requirements will be included.					
<b>E10.</b>	<b>Standard Conditions</b>					
	The industrial permit will include all of the standard conditions listed in the City's standard significant industrial users permit.					
<b>E11.</b>	<b>Special Requirements</b>					
	Reevaluate pollution prevention assessment and submit within 1 year. Reopener clause for BOD and/or TSS if BOD > 9,500 lb/day for 2 days/month for two consecutive months or > 6,400 lb./day monthly average for 2 consecutive months. Accidental Spill/Slug Plan is required. Toxic Organic Management Plan is not required.					
<b>E12.</b>	<b>Attachments</b>					
	Standard signatory authorization form.					
<b>E13.</b>	<b>Permit History</b>					
	Permit #FAY07 Latest renewal permit effective date March 1, 2010 – February 28, 2015					
<b>Part II. Publicly Owned Treatment Works (POTW) Specific Information</b>						
<b>A1.</b>	<b>Name, Address and Telephone of POTW Receiving Wastewater</b>			<b>POTW Mailing Address</b>		
	Paul R. Noland Wastewater Treatment Facility 1400 N. Fox Hunter Road Fayetteville, AR 72701 (479) 443-3292			Same		
<b>B1.</b>	<b>Industrial Pretreatment Primary Contact, Title, Telephone, Fax, E-Mail</b>					
	Denise Georgiou Industrial Pretreatment Coordinator (479) 443-3292 Tel (479) 443-5613 Fax Denise.Georgiou@ch2m.com					

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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		CH2M HILL 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

**CITY OF FAYETTEVILLE, ARKANSAS  
INDUSTRIAL WASTE DISCHARGE PERMIT**

**PERMIT NO. FAY05**

Hiland Dairy Foods, Inc. has been classified as a significant industrial user because of an average process discharge of 25,000 gallons per day or more, and the reasonable potential for adversely affecting the POTW's operation. In compliance with the provisions and conditions of the Discharge and Pretreatment Regulations in Chapter 51 of the Fayetteville Code and with any applicable provisions of local, federal or State of Arkansas laws or regulations,

**Hiland Dairy Foods, Inc., Prairie Farms Dairies & Dairy Farmers of America**  
301 E. 15<sup>th</sup> Street  
Fayetteville, Arkansas 72701,

hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC Nos. 2026 and 2028 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.

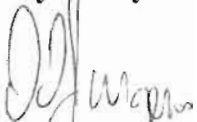
Noncompliance with any term or condition of this permit shall constitute a violation of the Fayetteville Code.

This permit shall become effective on **March 1, 2010** and authorization to discharge shall expire at midnight on **February 28, 2015**. 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 24<sup>th</sup> day of February, 2010

Approved By: **City of Fayetteville**

  
David Jurgens, P.E.  
Utilities Director

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

**SECTION A. WASTESTREAM LOCATIONS**

Location HD001

This wastestream shall consist of all process and cleanup wastewaters. The permitted point of discharge is in a Parshall flume in the manhole located approximately ten (10) feet east of the monitoring room, which is at the southeast corner of the plant. The quality of effluent discharged from Location HD001 shall, at a minimum, meet the limitations as set forth in Section B, Table I-1 of this Part.

**SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS**

The following limitations and monitoring requirements shall apply to discharge from **Location HD001** except for flow usage which applies as specified in the Table I-1 footnotes. The Permittee shall monitor the discharge from **Location HD001**, and the incoming water usage, and shall be limited as specified below:

Table I-1						
Parameter	LIMITATIONS <sup>1</sup>				MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average <sup>2</sup>		Frequency <sup>3</sup>	Sample Type
	(mg/l)	(lb./day)	(mg/l)	(lb./day)		
Biochemical Oxygen Demand (BOD <sub>5</sub> )	Report	Report	Report	Report	2/week	24-hr composite
Oil & Grease	Report	Report	Report	Report	1/week	Grab
Phosphorus, Total	Report	Report	Report	Report	1/week	24-hr composite
Total Suspended Solids (TSS)	Report	Report	Report	1,988	2/week	24-hr composite
pH	(4)		NA		1/day	Grab
Flow, Usage <sup>5</sup>	Report		Report		Continuous	Totalizer <sup>6</sup>
Flow, Discharge	Report		Report		Continuous	Totalizer <sup>6</sup>

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

<sup>2</sup> Monthly average is the average of all daily results in a calendar month regardless of the number of samples analyzed.

<sup>3</sup> Week means Sunday through Saturday. Month means calendar month. The date and time of an individual grab sample is the date and time at which the sample is collected. The date of a composite sample is the

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date on which sample collection for the composite sample is started and stopped. The composite sample date will be one day if the composite sample is collected on one day, e.g. April 14, 2007, or two days if the composite sample is collected over two days, e.g. April 14-15, 2007. Monitoring by the Control Authority is not a substitute for monitoring required to be conducted by the Permittee in this permit unless the Control Authority notifies the Permittee in writing that specific monitoring by the Control Authority can be used to meet permit frequency requirements.

<sup>4</sup> Within the range 5.0 to 12.5 standard units.

<sup>5</sup> Usage flow (incoming water) shall be measured at the city water meter north of the parking lot north of the facility.

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

## **SECTION C. COMPLIANCE SCHEDULE**

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

## **SECTION D. OTHER SPECIFIC REQUIREMENTS**

### **1. Pollution Prevention**

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

### **2. Specific Reopener Clause**

This permit may be reopened to determine BOD<sub>5</sub> and/or TSS loading limits when the daily BOD<sub>5</sub> loading exceeds 3,300 pounds per day for more than 2 days per month for two consecutive months or the BOD<sub>5</sub> monthly average exceeds 2,200 pounds per day for 2 consecutive months.

### **3. Accidental Spill/Slug Prevention Plan Requirement**

The Permittee is not required to have an Accidental Spill/Slug Prevention Plan in accordance with Part IV, Section C.

### **4. Toxic Organic Management Plan Requirement**

The Permittee is not required to have a Toxic Organic Management Plan.

**CITY OF FAYETTEVILLE, ARKANSAS  
INDUSTRIAL WASTE DISCHARGE PERMIT**

**PERMIT NO. FAY03**

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

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

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

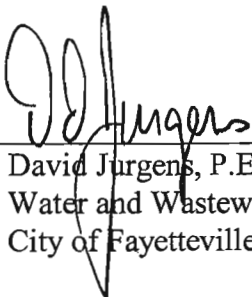
Noncompliance with any term or condition of this permit shall constitute a violation of the Fayetteville Code.

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

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

Signed this 27<sup>th</sup> day of AUGUST, 2008

Approved By: \_\_\_\_\_

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

D-1/3

**SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS**

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

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

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

<sup>2</sup> Monthly average is the average of all daily results in a calendar month regardless of the number of samples analyzed.

<sup>3</sup> Week means Sunday through Saturday. Month means calendar month. The date and time of an individual grab sample is the date and time at which the sample is collected. The date of a composite sample is the date on which sample collection for the composite sample is started and stopped. The composite sample date will be one day if the composite sample is collected on one day, e.g. April 14, 2007, or two days if the composite sample is collected over two days, e.g. April 14-15, 2007. Monitoring by the Control Authority is not a substitute for monitoring required to be conducted by the Permittee in this permit unless the Control Authority notifies the Permittee in writing that specific monitoring by the Control Authority can be used to meet permit frequency requirements.

<sup>4</sup> Oil and Grease is analyzed as an alternative to TTO (Total Toxic Organics). The Permittee also has an approved Toxic Organics Management Plan (TOMP). Oil and grease monitoring as specified above and certification statements in each monitoring report are required in lieu of TTO monitoring. Any TTO analysis performed according to the methods in 40 CFR 136 must be submitted in the monitoring reports and is limited as specified in this table.

<sup>5</sup> Usage flow (incoming water) shall be measured at the city water meter in the northeast corner of the fenced area of the property.

<sup>6</sup> 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. Non-discharge Process**

Discharge of wastewater from the chrome plating process is prohibited. All chrome plating wastewater shall be hauled off-site for treatment, disposal, or recycling

#### **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.

#### **3. Specific Reopener Clause**

This permit may be reopened to recalculate discharge limitations.

**CITY OF FAYETTEVILLE, ARKANSAS  
INDUSTRIAL WASTE DISCHARGE PERMIT**

**PERMIT NO. FAY09**

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

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

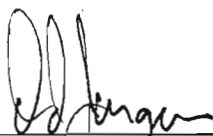
hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC No. 3714 from premises located at the above address and through outfalls identified herein to the City of Fayetteville's POTW collection system in accordance with effluent limitations,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

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

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

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

Signed this 29th day of December 2008

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

*Note: Superior requested a transfer of the permit to this new name before the effective date so effective date is the same as on the original permit issued in October.*

*- JB*

*E-1/4*



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

## SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

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

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

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

<sup>2</sup> Monthly average is the average of all daily results in a calendar month regardless of the number of samples analyzed.

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

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

- <sup>4</sup> 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.
- <sup>5</sup> 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.
- <sup>6</sup> Measure continuously with a flow meter with a totalizer. Report daily flow for wastewater discharge on all monitoring days, and average daily and total monthly flow for water usage and wastewater discharge.

### **SECTION C. COMPLIANCE SCHEDULE**

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

### **SECTION D. OTHER SPECIFIC REQUIREMENTS**

#### **1. Pollution Prevention**

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

**CITY OF FAYETTEVILLE, ARKANSAS  
INDUSTRIAL WASTE DISCHARGE PERMIT**

**PERMIT NO. FAY15**

Ayrshire Electronics, LLC has been classified as a significant industrial user because of the wave solder process, and the solvents used at the permitted plant site. In compliance with the provisions and conditions of the Discharge and Pretreatment Regulations in Chapter 51 of the Fayetteville Code and with any applicable provisions of local, federal or State of Arkansas laws or regulations,

**Ayrshire Electronics, LLC  
1101 South Beechwood Avenue  
Fayetteville, Arkansas 72701,**

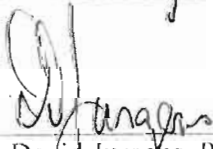
hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC Nos. 3672 from premises located at the above address and through outfalls identified herein to the City of Fayetteville's POTW collection system in accordance with effluent limitations, 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 **March 1, 2008** and authorization to discharge shall expire at midnight on **February 28, 2013**. The duration of this permit shall not exceed 5 years.

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

Signed this 27<sup>th</sup> day of February, 2008

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

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**SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS**

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

Table I-1				
Parameter	LIMITATIONS <sup>1</sup>		MONITORING REQUIREMENTS	
	Daily Maximum		Frequency <sup>2</sup>	Sample Type <sup>3</sup>
	(mg/l)	(lb./day)		
Copper, total	Report	0.339	1/month	Grab
Lead, total	Report	0.188	1/month	Grab
Zinc, total	Report	0.038	1/month	Grab
TTO, 40 CFR 433	2.13	-	NA	Certification <sup>4</sup>
Flow, Usage <sup>5</sup>	Report	Report	Continuous	Totalizer <sup>6</sup>
Flow, Discharge	Report	Report	Continuous	Totalizer <sup>6</sup>

<sup>1</sup> 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 (ug/l): 0.5 cadmium, 10 chromium, 0.5 copper, 0.5 lead, 0.005 mercury, 0.5 nickel, 0.5 silver, 20 zinc, 10 cyanide.

<sup>2</sup> Week means Sunday through Saturday. Month means calendar month. The date and time of an individual grab sample is the date and time at which the sample is collected. The date of a composite sample is the date on which sample collection for the composite sample is started and stopped. The composite sample date will be one day if the composite sample is collected on one day, e.g. April 14, 2007, or two days if the composite sample is collected over two days, e.g. April 14-15, 2007. Monitoring by the Control Authority is not a substitute for monitoring required to be conducted by the Permittee in this permit unless the Control Authority notifies the Permittee in writing that specific monitoring by the Control Authority can be used to meet permit frequency requirements.

<sup>3</sup> Where Grab is specified as the sample type, the mixers in the tank west of the treatment building must be running when the grab sample is collected. If the mixers are not running, a composite sample must be collected comprised of a minimum of (4) aliquots per day at collected at equal time intervals.

<sup>4</sup> 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.

<sup>5</sup> Usage flow (incoming water) shall be measured at the city water meter located approximately 8 feet south of the guard shack, which is approximately 80 feet north of the main entrance to the office building

<sup>6</sup> 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.



CH2M HILL  
1400 N. Fox Hunter  
Fayetteville, AR 72701  
Tel 479.443.3292  
Fax 479.443.5613

April 27, 2012

Mr. Ben Gasca  
Tyson Foods, Inc.  
2615 S. School  
Fayetteville, AR 72701

Subject: Compliance Evaluation of Tyson Foods, Inc.  
Industrial Waste Permit # FAY07

Dear Mr. Gasca:

On December 16, 2011, a compliance evaluation was conducted at Tyson Foods, Inc., 2615 S. School, Fayetteville, Arkansas. The purpose of this evaluation was to determine compliance status with the industrial waste discharge permit, City of Fayetteville Code, and 40 Code of Federal Regulations (CFR) Part 403. Participants included:

Richard Stockton, Tyson Foods Refrigeration Superintendent  
Denise Georgiou, CH2M HILL Industrial Pretreatment Coordinator

A copy of the field inspection report is enclosed for your records. Based on evaluation observations, Tyson Foods, Inc. was found in compliance. The following improvements, however, are necessary:

1. Ensure in-house pH is analyzed in accordance with a method listed in 40 CFR 136.
2. Please submit an updated waste stream schematic for the facility.

Please respond in writing within thirty (30) days of the date on this letter in answer to the evaluation results with proposed actions and projected dates of completion where necessary.

I appreciate the cooperation and courtesy of your staff during this evaluation. Please contact me at 443-3292 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Denise Georgiou".

Denise Georgiou  
Industrial Pretreatment Coordinator  
Fayetteville Wastewater Treatment Facilities

Enclosure: Inspection Report Form

G-1/11

**Industrial Pretreatment Program Inspection Report - Long Form  
City of Fayetteville**

Date 12/16/11

Reported by Denise Georgiou  
signature

**A. Facility Description**

Name Tyson Foods, Inc. (Fayetteville) Contact Name Richard Stockton, Ben Gasca

Location address 2615 South School, Fayetteville AR 72701

Mailing address Same

Principal product/service Manufacture frozen cheesecake, corn cooking, chips, oven lines, and flour tortillas, and have freezer storage.

Permit No. FAY07 n/a  SIC Code(s) 2038 (Frozen specialties) 2099 (Food prep.)

Categorical  Significant noncategorical  Undetermined

Operating schedule: Hours/day 16 -24 production, 8 clean-up during day rotate through lines, 24 maint.

Days/week 6-7 Weeks/year 52

Shift schedule: 1<sup>st</sup> 6am-3:30pm 2<sup>nd</sup> 4pm-12:30am /2pm-10pm maint. 3<sup>rd</sup> 8pm-5:30am /10pm-6:30am maint. MOS 7days, 24hrs prod; 1/wk cleanup each production unit

Scheduled plant shutdown periods Memorial Day, July 4th, Labor Day, Thanksgiving Day & Day after, Christmas Day, New Year's Day

Plant activities during shutdown Maintenance; warehouse cleanup; fog plant sometimes; in winter months - trickle out cooling towers

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

Employees per shift: 1st 249 2nd 129 3rd 140

**B. Inspection Description**

Entry time 09:05 hours Exit time 11:35 hours

Type inspection (check all that apply):

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Scheduled                | <input type="checkbox"/> Partial                                   |
| <input type="checkbox"/> Unscheduled (2 hrs. notice or less) | <input type="checkbox"/> User Classification                       |
| <input type="checkbox"/> Demand                              | <input type="checkbox"/> Pre-permit                                |
| <input type="checkbox"/> Initial                             | <input type="checkbox"/> Compliance follow-up                      |
| <input checked="" type="checkbox"/> Comprehensive            | <input checked="" type="checkbox"/> Other <u>Annual Compliance</u> |

Attendance:

Name/Title	Facility/Agency	Telephone
Richard Stockton/Refrigeration Superintendent	Tyson	521-0677 x 620
Denise Georgiou/ IPC	CH2M HILL	443-3292

**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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Unregulated wastestream(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Good</u>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
(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 checked="" type="checkbox"/>	_____
cooling systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
dehumidifier(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
air pollution control equip.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Good</u>

Comments Chemical storage area has containment trenches that do not drain. The cooling towers on the roof drain into a tank, then into a trench in the engine room. Details on 2004 schematics. Also have 2009 schematics. Received schematic for 2 new taco lines planning to go online Feb 2012

D. **Regulated Processes (Each)**

Regulated process description Baked tortillas and chips from raw corn

Federal category/subcategory NA

Average production (if production based limits) NA

Operating schedule 6-7 days, 24 hours

Discharge type: Continuous  Batch  Both

Volume/frequency: Continuous 190,000 gpd. Batch \_\_\_\_\_

Sample location(s) receiving these wastewaters TYS001

Comments The corn steeping and washing process is the primary source of BOD in the wastewater.

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Regulated process description Frozen Cheesecake

Federal category/subcategory NA

Average production (if production based limits) NA

Operating schedule \_\_\_\_\_

Discharge type: Continuous  Batch  Both

Volume/frequency: Continuous \_\_\_\_\_ Batch \_\_\_\_\_

Sample location(s) receiving these wastewaters TYS001

Comments No water in process. Just sanitation.

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Regulated process description Tortillas (MO South)

Federal category/subcategory NA

Average production (if production based limits) NA

Operating schedule 24hr./day, 7days/wk.

Discharge type: Continuous  Batch  Both

Volume/frequency: Continuous < 10,000 gpd Batch \_\_\_\_\_

Sample location(s) receiving these wastewaters TYS001

Comments Weekly wash-down of one unit per day and daily clean up using air. Blender jacket flow is continuous non-contact cooling with closed-loop glycol.

G-5/11



**E. Sample Location(s) (Each)**

Sample location no. TYS001 Verified during inspection  Sampled

Description Flume in the wastewater building west of the plant

Estimated volume/description of:

Regulated flow 0  
Unregulated flow 200,000 gpd  
Dilutional flow 6,000 gpd ( 5 cooling towers & 2 boilers)

Projected process flow in 5 years Stable discharge. Was reduced in 2010 with removal of post pastuerization USDA lines.

Flow measurement approved  Verified during inspection

Flow meter calibrated  Observed calibration  Reviewed records

Collection methods approved  Verified during inspection

Comments Weekly verification of flow meter accuracy. Last annual calibration November 2011.

**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  Both   
Analysis performed by: Industry  Contract lab  Both

Industry personnel responsible for sampling and/or analysis trained to do so?  by whom Environmental Sevices Company (Sam Isaacs), Richard Stockton (annual retraining)

Name/address of contract lab(s) Environmental Services Company, 1107 Century Ave., Springdale AR 72762 750-1170

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 6°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

trenches have screens. There is a trench near the residuals loading containment pad to help prevent storm water from entering.

**I. Residuals Management**

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

Screenings and condemned food are removed to Tyson River Valley By-products facility in Scranton AR and to Bakery feeds. About 6 totes/day are generated, 10,000-20,000 lb./day. (becomes pet food)

Medical waste generated at the first aid station is a biohazard and is removed by Rineco.

Fluorescent bulbs, mercury switches, batteries, and aerosols (solvents) are removed by WM Lamp Tracker for recycling.

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:

Waste machine oil is taken to the 300gal storage tank and is removed by Used Oil Services as needed. Reduced volume of oil disposal due to in-house recycling of compressor oil for reuse. Approximatley 200 gallons every other month.

\_\_\_\_\_

\_\_\_\_\_

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

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 Sample refrigerator is checked daily and documented on wastewater ratio check sheet. Tyson does pH on Tues, Thurs, Sat, Sun.; commercial lab does all composite sampling and analysis and the rest of the pH.

**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 In-plant corn washer screens/ Rotating fine screen in wastewater building located at the N.W. corner of the facility.

Contributing processes Corn washer/ All food prep. processes, clean-up, cooling towers, and boiler blowdown.

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? Brad Walker and Richard Stockton. If system is shut off, it'll all go down the floor drain.

Comments Floor drains in wastewater building have screens to catch floor clean-up residuals. All plant

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 One Super Agitene parts washer in the maintenace shop.

**L. Accidental Discharge, Slug Control**

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

- Chemical storage areas  \_\_\_\_\_ Verified
- Acid use areas  TYS001 (cleaner) NA  Verified
- Caustic use areas  TYS001 (cleaner, lime) NA  Verified
- Raw materials storage areas  TYS001 Verified
- Maintenance shop areas  \_\_\_\_\_ Verified
- Paint application areas  \_\_\_\_\_ NA  Verified

Are there spill facilities?  Where discharged to? Berm at diesel tank. New in-plant chemical storage area and oil storage area have no drains. Liquid shortening contained in building with no drain. Bermed drain at emergency shower in chem building. Spill supplies at hazmat supply shed near SE corner of facility building and at NW corner of facility.

Is there a potential for a slug discharge?

Does User have an approved Accidental Discharge/Slug Control Plan (ADSCP)?

Discharge  Slug  Both Reviewed prior to inspection

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

Are ADSCP records being maintained?  Verified

Does User have other spill plans or procedures?  Reviewed

Is there a need for an ADSCP?  Discharge  Slug  Both

If no, explain why Spill response is also the Emergency Action Plan. Process Safety Mangement (PSM) and RMP programs also address ammonia. SPCC for oils. Separate Stormwater program and Pollution Prevention Plan, and ASPP. Changed from plastic to metal piping for dyes and added secondary containment.

Comments \_\_\_\_\_

**M. Defined Pollutants**

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

Flour, corn, meat, spices, acidic and caustic cleaners, quaternary ammonia in hand and boot sanitizer , soaps, cooking oil, food dyes, lime, boiler chemicals, and 1/yr cooling tower chemicals and periodic tower and boiler blowdown (trickled in).

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

All of the above plus machine oil, ammonia, parts cleaner, inks, and glycol (biodegradable).

**N. Close Out Interview**

Attending Denise Georgiou, Richard Stockton

Findings:	OK	Not OK	NA	Comments
Waste stream schematic(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please send update
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ensure pH method is in 40 CFR <u>136. In-house method listed</u> <u>as 150.1</u>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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

P2 - Switched from eye-actuated whole sink hand wash to knee activated individual faucet sensors for water conservation.

- Reduced volume of oil disposal due to in-house recycling compressor oil for reuse.

- Blender jacket flow is continuous non-contact cooling with closed loop glycol.

- Lamps, ballasts, and batteries are shipped for recycling/disposal.

- 10,000-20,000 lb./day of screenings and condemned food becomes pet food. (See Section 1)

- Recycle scrap metal.

- Looking at pH controller for acid feed to reduce pH at outfall from 10-11 to around 7.

- Waste oil is reused/recycled so no fee for pickup.

- Automatic scan of tortillas pushes non-perfect tortillas to a can for reuse.

1/yr entire cooling towers (2) are emptied to clean tanks.

USDA line gone early 2010 (post pasteurizing) which resulted in less discharge flow.

Permit No. FAY07

Tyson Foods - Entrée' Facility

Location TYS001

2615 S. School Avenue

Reporting Period:

Fayetteville, AR 72701

Industry Contact: Richard Stockton

July-12

Para.	pH-S.U.	O&G-mg/l	O&G-lbs	Phos-mg/l	Phos-lbs	BOD(mg/l)5D	BOD(#/d)5D	TSS(mg/l)	TSS(#/d)	Flow (Inf.)-gpd	Flow (Eff)-gpd
Freq.	1/day	1/wk	1/wk	1/wk	1/wk	3/wk	3/wk	3/wk	3/wk	cont.	cont.
Limit	5-12.5	report	N/A	report	N/A	report	report	report	report	report	report
D 1	9.41					2768	3972.93	2360	3387.32	231,000	172,099
2	11.50									284,000	215,689
3	11.12									241,000	263,195
4	7.99	29.60	14.53	4.80	2.36	1063	702.85	1310	866.17	153,000	79,280
5	11.50					2159	3694.43	1920	3285.46	285,000	205,177
6	11.20									284,000	210,036
7	11.32									215,000	190,104
8	11.12					1196	1476.40	2040	2518.27	209,000	148,015
9	11.40									305,000	217,997
A 10	11.17					2361	4616.00	2330	4555.39	282,000	234,425
11	11.50	35.40	68.50	5.20	10.06					280,000	201,134
12	11.34					2250	3635.29	2070	3344.46	274,000	193,727
13	11.00									255,000	179,430
T 14	10.91									213,000	171,398
15	12.15					1856	2555.22	2060	2836.07	225,000	165,076
16	10.90									283,000	205,991
17	11.11					1661	2552.53	2270	3488.41	267,000	184,262
E 18	10.80	39.80	65.35	2.60	4.27					277,000	193,986
19	10.53					2,674	4,037	2020	3049.93	276,000	181,039
20	10.70									255,000	195,006
21	10.99									262,000	296,052
22	10.94					2213	4390.47	2560	5078.90	287,000	237,883
23	10.90									267,000	186,969
24	11.06					1681	3608.38	2720	5838.66	312,000	257,382
25	11.10	30.60	64.29	4.70	9.87					304,000	229,636
26	11.25					2290	4534.56	2450	4851.39	287,000	237,429
27	11.00									305,000	322,257
28	11.15									233,000	185,675
29	6.41					2236	2330.53	1640	1709.33	202,000	124,973
30	11.10									327,000	223,931
31	11.23					2192	4884.05	1920	4278.00	352,000	267,161
Mo. Avg.	10.83	33.85	53.17	4.33	6.64	2042.86	3356.50	2119.29	3506.27	265,548	205,691
Mo. Total	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8,232,000	6,376,414

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 the 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.

Signature Richard Stockton Title Refrig. Superintendent Date 8-18-2012

Rec'd Postmark 17-AUG-12 DB Data Entry NOV - 20

14-1/6

July 2012

Industrial User Response to Violation

Discharger: Tyson's Entrée/Mexican Originals South

Address of Discharger: 2615 South School, Fayetteville, AR 72701

Permit#: 59001N

Date Occurred	Nature of Violation	Suspected Cause	Corrective Measure(s)	Date of Abatement	Measure(s) to Prevent Recurrence
	None				

17-2/6 ✓

(Attach additional pages if necessary)

Richard Stockton Richard Stockton Refrig Superintendent Richard Stockton 18-Aug-12  
 Authorized Signatory (Print) Title Signature Date Signed

Following 24-hour notice, return this completed form within 5 days of becoming aware of the violation to:

City of Fayetteville  
 1500 N. Fox Hunter Rd.  
 Fayetteville, AR 72701  
 Attn: Industrial Pretreatment Coordinator  
 (phone) 443-3292, (fax) 443-5613 Fax may be used to meet 5 day requirement. Original may be included with next monthly report.



# 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. (479)750-1170 Fax (479)750-1172

Control Number: 1207020418  
 Customer Name : TYSON ENTREE/MEXICAN ORIG SOUTH  
 Customer Number : 785  
 Report Date : 08/01/12  
 Composite Date: 07/24/12 -07/25/12  
 Sample Time : 0715-0744/0744  
 Sample Type : FPC/GRAB  
 Sample From : TYS001  
 Collected By: RHB  
 Delivery By : RHB  
 Work Order :  
 Purchase Order :

Analysis				Laboratory Analysis				Quality Assurance	
Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
07/25	1340	MNM	BOD, 5-day	1681.0 mg/L	(b)	3531.82 #/day	SM 18th 5210B	5.95	104.5 *
07/30	0800	MNM	Oil & Grease, Total	30.6 mg/L		64.29 #/day	EPA 1664A	16.48	112.3 *
07/25	0744	RHB	pH	11.1 S.U.			SM 18th 4500-H+ B	0.00	N/A *
07/30	0845	KIK	Phosphorous, Total (as P)	4.7 mg/L		9.87 #/day	EPA 365.3	2.90	95.9 *
07/26	1400	MNM	Solids, Total Suspended	2720.0 mg/L	(b)	5714.79 #/day	SM 18th 2540D	13.33	N/A *

Flow 0.252123 MGD

\* QA data shown is from a different sample or standard on the same date.  
 (b) Exceeds Permit Limits for Maximum Concentration

All equipment used is checked and/or calibrated daily. All NPDES 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.

H-3/6



# 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. (479)750-1170 Fax (479)750-1172

Control Number: 1207020026  
 Customer Name : TYSON ENTREE/MEXICAN ORIG SOUTH  
 Customer Number : 785  
 Report Date : 07/11/12  
 Composite Date: 07/04/12 -07/05/12  
 Sample Time : 0730-0740/0740  
 Sample Type : FPC/GRAB  
 Sample From : TYS 001  
 Collected By: SJI  
 Delivery By : SJI  
 Work Order :  
 Purchase Order :

### Laboratory Analysis

Analysis Date	Time	BY	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
07/06	1400	SJI	BOD, 5-day	1063.0 mg/L	(b)	521.82 #/day	SM 18th 5210B	3.86	87.5 *
07/09	0800	KIK	Oil & Grease, Total	29.6 mg/L		14.53 #/day	EPA 1664A	1.42	106.0 *
07/05	0745	SJI	pH	11.5 S.U.			SM 18th 4500-H+ B	0.00	N/A
07/06	1030	KIK	Phosphorous, Total (as P)	4.8 mg/L		2.36 #/day	EPA 365.3	9.66	109.2 *
07/05	1000	SJI	Solids, Total Suspended	1310.0 mg/L	(b)	643.07 #/day	SM 18th 2540D	7.69	N/A *

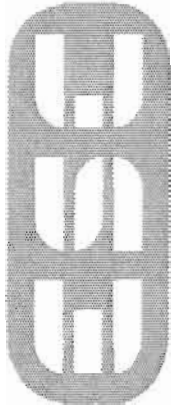
Flow 0.058907 MGD

\* QA data shown is from a different sample or standard on the same date.  
 (b) Exceeds Permit Limits for Maximum Concentration

All equipment used is checked and/or calibrated daily. All NPDES 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.

17-5/6



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](http://www.esclabs.com)

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

# CHAIN OF CUSTODY

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

Phone 479-750-1170 Fax: 479-750-1172

Client Information				Project Information				Requested Parameters			
Company Name: Tyson's Entrée/ Mexican Original				Permit/Project #: 59001N/MOS-001							
Address: 2615 So. School Fayetteville AR 72701				Purchase Order #:							
Telephone: (479) 521-0677				Sampler Name(s): Sam. FRACKL							
FAX: (479) 521-0065				and Signature(s):							
ESC Client Number: 785											
Sample Identification		Sample Collection		Sample Containers							
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	☒ Grease	☒ BOD, TSS
TYS001	120702626	7/5/12	0740	Grab	Water	teflon	150 ml	none	1	X	
		7/5/12	0730	Grab	Water	glass	1 qt.	H <sub>2</sub> SO <sub>4</sub> , pH<2/ice*	1	X	
		7/5/12	0730	FPC	Water	plastic	1 qt.	H <sub>2</sub> SO <sub>4</sub> , pH<2/ice*	1		X
		7/5/12	0730	FPC	Water	plastic	1 qt.	none/ice*	1		X
Relinquished By: (Signature and Printed Name) <i>Sam Frackl</i> Date: 7/5/12 Time: 0930 Received By: (Signature and Printed Name) _____ Date: _____ Time: _____ Relinquished By: (Signature and Printed Name) _____ Date: _____ Time: _____ Received By: (Signature and Printed Name) _____ Date: _____ Time: _____ Relinquished By: (Signature and Printed Name) _____ Date: _____ Time: _____ Received By: (Signature and Printed Name) _____ Date: _____ Time: _____											
Comments: FLOW DATA Analyst: SDB Time: 0740 Reading: 088907 Units: MGD Field Test: pH: 8.2 Temp.: 70.5 DO: 3.0 Debris:											
Custody Seals: Used? <input type="checkbox"/> Intact? <input type="checkbox"/> Turnaround: Regular <input type="checkbox"/> Special <input type="checkbox"/> Were samples properly preserved: Yes <input type="checkbox"/> No <input type="checkbox"/> Result: 16.5 Result: 30.9 Units: °C Units: °F											

\* All samples cooled to ≤ 6° C in accordance with 40 CFR 136.

9/9-6/6

**SOLVENTS/TOXIC  
ORGANICS  
MANAGEMENT  
PLAN / BMP**

Revised Edition April 2002  
By: Gerardo Gonzalez



Peter West  
Ayrshire Electronics, LLC  
1101 South Beechwood Avenue  
Fayetteville, Arkansas 72701

May 8, 2002

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

Dear Ms. Georgiou,

The purpose of this letter is to provide you with a copy our STOMP program.

**If I can answer any questions please do not hesitate to call. I can be reached at a direct phone number 684-2389. The main plant phone number remains 442-5356.**

*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."

Contact Person: Peter West

Phone: (501) 442-5356

Title: Process Engineering Manager

Signed: Peter West

Date: 5/8/02

Sincerely,  
Peter West

cc: file  
Tim Pearce

For  
Deliver  
Rec'd Postmark 051302  Data Entry \_\_\_\_\_ NOV \_\_\_\_\_

AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

**SOLVENTS/TOXIC ORGANIC MANAGEMENT PLAN (STOMP)**

**FACILITY:**

AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72071

GARY LEHREN, PRESIDENT

**OWNER:**

MILO D. BRYANT  
P.O. BOX 22528  
LOUISVILLE, KY 40252

**ENVIRONMENTAL PERMITS HELD:**

CITY OF FAYETTEVILLE INDUSTRIAL WASTE DISCHARGE  
PERMIT NO. C9001R-M

ARKANSAS D.P.C. & E AIR DISCHARGE PERMIT NO. 686-AR-5

Attached are documents outlining the various processes involved in the manufacture of printed circuit boards at the Fayetteville plant of Ayrshire Electronics, LLC.

The processes are broken into two general categories, those that discharge into the Fayetteville City sewer system and those that do not.

Hazardous waste from the Fayetteville plant is handled as stipulated in the AYRSHIRE ELECTRONICS, LLC policy "Guideline for Handling, Storing, shipping and Disposal of Hazardous Waste", adapted from the Baldwin issued June 1, 1981 and revised May 29, 1985.

I-3/81

AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

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*I-4/31*



AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

## PROCESS ANALYSIS

The Fayetteville, Arkansas Plant of Ayrshire Electronics, LLC is engaged in the manufacture of printed circuit board assemblies. The printed circuit boards are principally manufactured for other companies.

Processes involved in the production of the electronic instruments and printed circuit board assemblies are as follows:

1. Inserting (stuffing) electronic components into the bare printed circuit boards and soldering and inspection and testing of the stuffed printed circuit boards.
2. Assembling of the completed printed circuit boards and painted metal parts into subassemblies.
3. Assembling subassemblies and cabinets and testing to produce the finished product.
4. Packaging and shipping of the finished product.

AYRSHIRE ELECTRONICS, LLC  
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FAYETTEVILLE, AR 72701

### **PROCESS WITH DRAINAGE TO THE CITY SEWER SYSTEM**

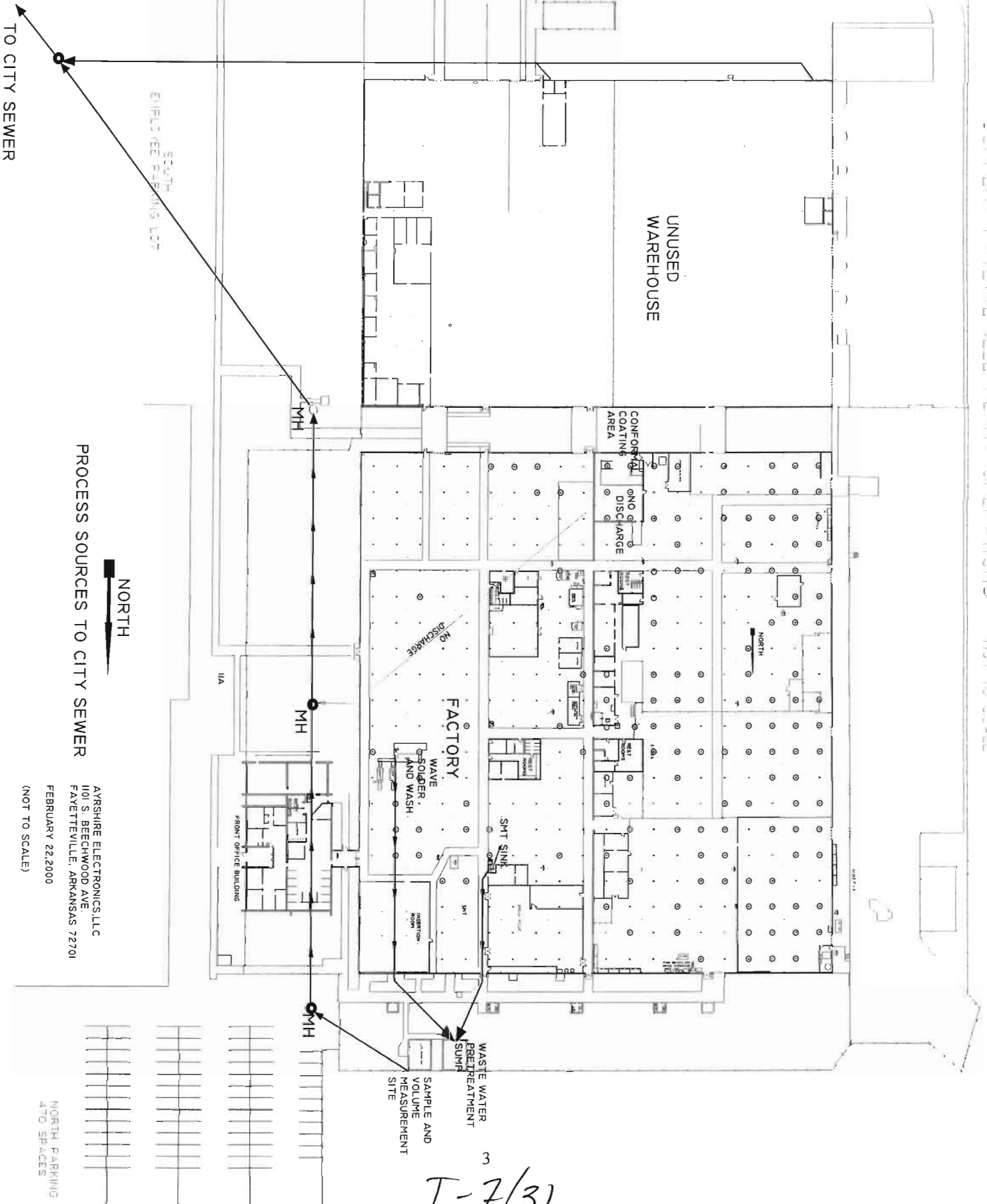
Flow diagrams of the processes used in the manufacturing at this facility, having drainage to the Fayetteville City sewer system are attached to and form a part of this document.

The first flow diagram shows the whole of the plant processes having drainage to the city sewer system. The remaining flow diagrams show the product flow, points where materials are introduced into the processes, and the by-product and/or wastewater outflows and are as follows:

1. SMT stencil cleaning sink
2. Wave Solder Department
3. Wastewater Treatment System

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CURRENT FAYETTEVILLE PLUMT SPECIFICATIONS 1/18/17 TO SCALE



PROCESS SOURCES TO CITY SEWER

NORTH

AYRSHIRE ELECTRONICS, LLC  
1101 S. BEECHWOOD AVE  
FAYETTEVILLE, ARKANSAS 72701  
FEBRUARY 22, 2000  
(NOT TO SCALE)

NORTH PARKING  
470 SPACES

3  
I-7/31

## PROCESS DESCRIPTION

### WAVE SOLDER AND WASH OPERATION

1. The assemblies that have had parts inserted into them are staged near the wave solder machine.
2. The assemblies are then loaded into the wave solder machine conveyor.
3. The conveyor carries the boards over the foam flux and through the IR pre-heater and then through the solder wave.
4. After exiting the solder wave the boards travel in the cleaning machine conveyor.
5. The boards travel through four stages of hot water rinse and then through hot air blow-off.
6. The soldered and cleaned panel are unloaded from the wash unit conveyor and placed into totes.
7. The rinse water from the cleaning machine is piped to the wastewater sedimentation tank.

### II. SMT SINK USED FOR CLEANING SMT SCREENS

1. The SMT (Surface Mount Technology) screen printer uses stainless steel screens to screen print solder paste onto the printed circuit boards.
2. After completion of the screen printing process the excess solder paste is removed from the screen with a spatula and then wiped with a paper towel. The excess solder paste and contaminated paper towels are placed in a container for recycling.
3. The stainless steel screen is then taken to the SMT sink for a final wash to clear the small apertures in the screen of any remaining solder paste.
4. The SMT sink empties into a small sump located under the sink. This sump is cleaned as required. Solids removed from this sump are placed into recycling container.
5. The water from the sink is piped to the main wastewater sedimentation tank.

### III. WASTE WATER TREATMENT SYSTEM

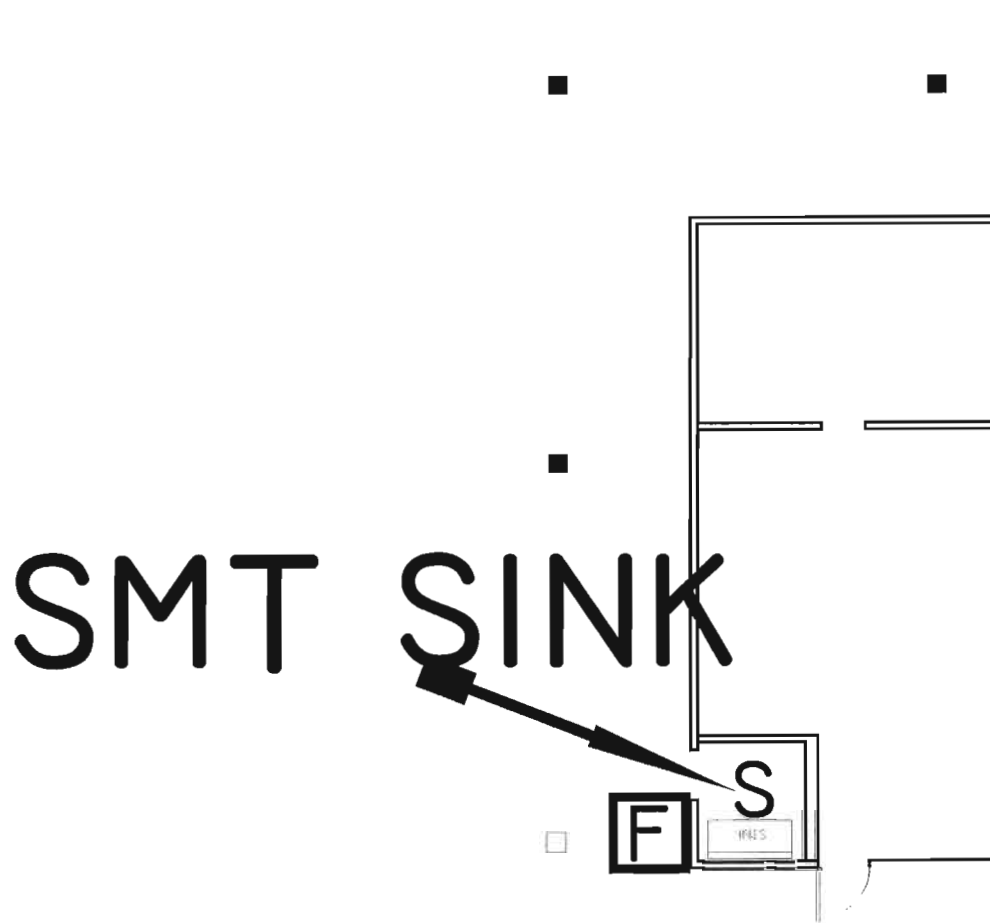
1. Wastewater from the wave/wash machine and surface mount area sink are routed to the sedimentation tank for collection.
2. This water is held as a batch during which time any solids present settle to the bottom of the tank.
3. Once per day at about noon the holding tank is pumped through a volume meter into the city sewer system. During the pumping the tank is agitated.
4. The discharge volume is recorded and weekly samples are taken for analysis.

The results of the weekly sample analysis are submitted in monthly reports to OMI.

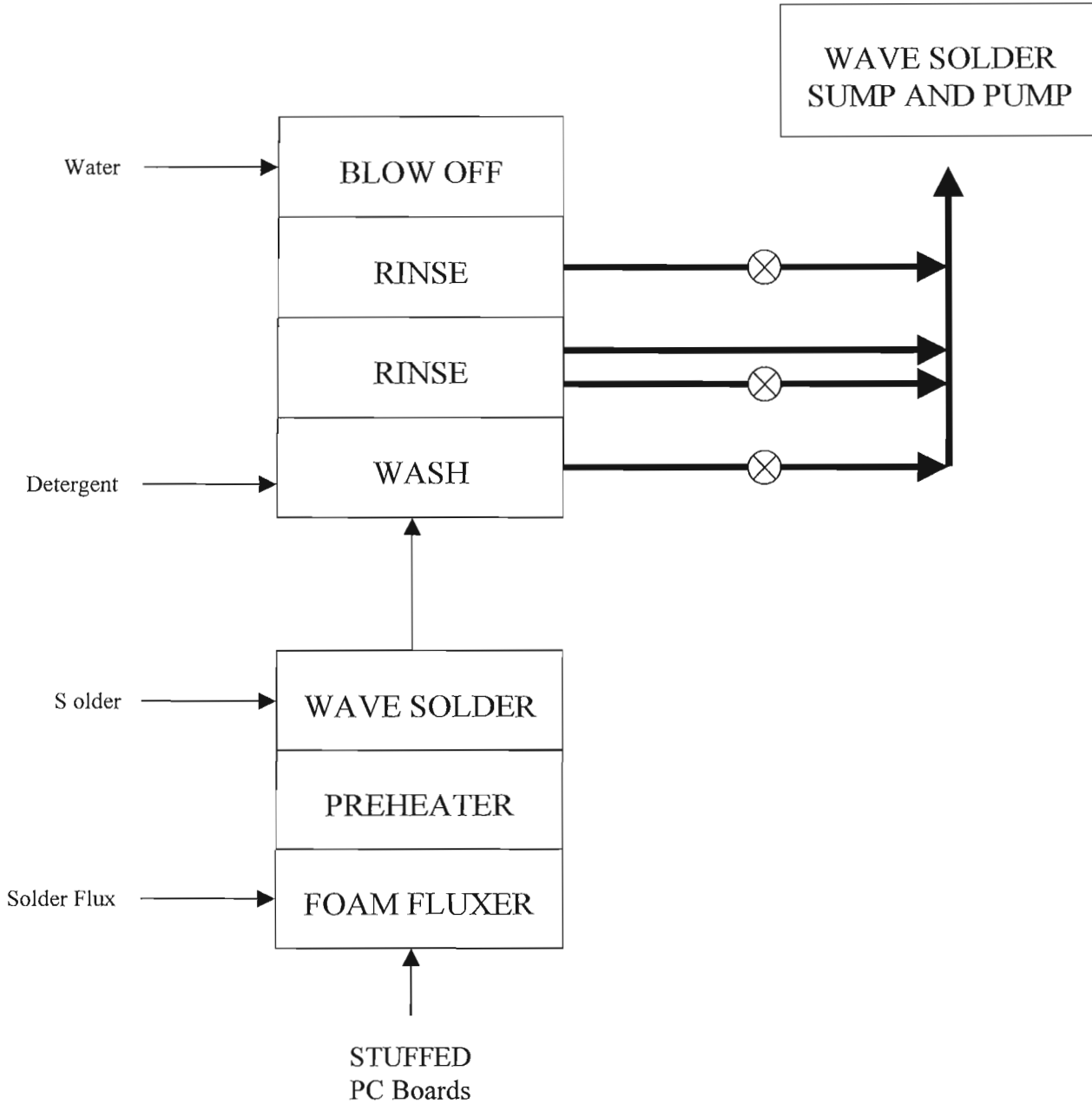
AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

To Wastewater  
Treatment  
System

SMT SCREEN CLEANING AREA:



I-9<sup>5</sup> (31)



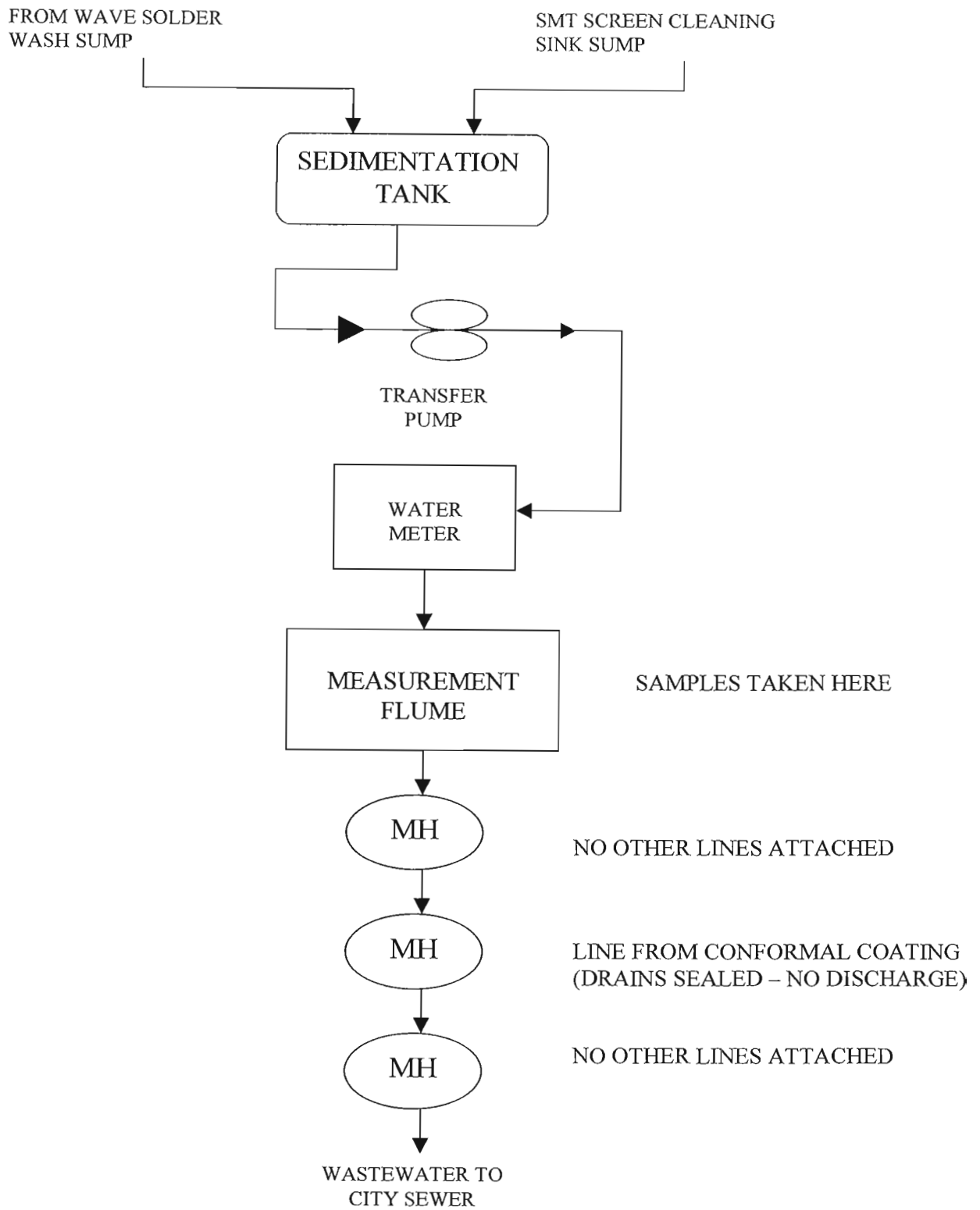
Typical of Two  
Wave Solder Systems

WAVE SOLDER DEPARTMENT FLOW DIAGRAM

<sup>6</sup>  
I-10/31

AYRSHIRE ELECTRONICS, LLC  
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FAYETTEVILLE, AR 72701

Waste-Water Flow Diagram



I-11<sup>7</sup>/31

**RAW MATERIALS USED IN THE PROCESSES**

1. WAVE SOLDER:

KESTER SOLDER FLUX  
KESTER 5760 ACID NEUTRALIZER  
KESTER 5768 SAPONIFIER  
ISOPROPYL ALCOHOL  
SOLDER (BAR STOCK)

2. COATING ROOM

XYLENE  
CONAP/CYTEC CONFORMAL COATING  
CONAP/CYTEC THINNER  
HUMISEAL CONFORMAL COATING  
HUMISEAL THINNER  
HYSOL CONFORMAL COATING  
DOW CORNING 1-4105 COATING  
DOW CORNING 3-1753 COATING  
DOW CORNING OS0120 THINNER  
SHIN ETSU KE3421 CONFORMAL COATING  
START INTERNATIONAL CONFORMAL COATING AND THINNER

3. OTHER MATERIALS

Various electronic components (capacitors, resistors, relays, connectors)  
Pre-manufactured metal housings (pre-painted)  
Wire cables for connections  
Cardboard  
Plastic parts and packaging



AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

**PROCESSES WITHOUT DISCHARGE TO CITY SEWER**

The processes, without discharge to the city sewer system, involved in the production of printed circuit assemblies in the plant are as follows:

1. Assembly of completed printed circuit boards into subassemblies.
2. Assembling cabinets using finished parts from outside sources and printed circuit boards from above described process.
3. Final assembly of the finished product.
4. Packaging and shipping.
5. Conformal Coating

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FAYETTEVILLE, AR 72701  
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FAYETTEVILLE, AR 72701

**FINISHING MATERIALS, SOLVENTS AND ADHESIVES USED IN THE PROCESS**

WAVE SOLDER:

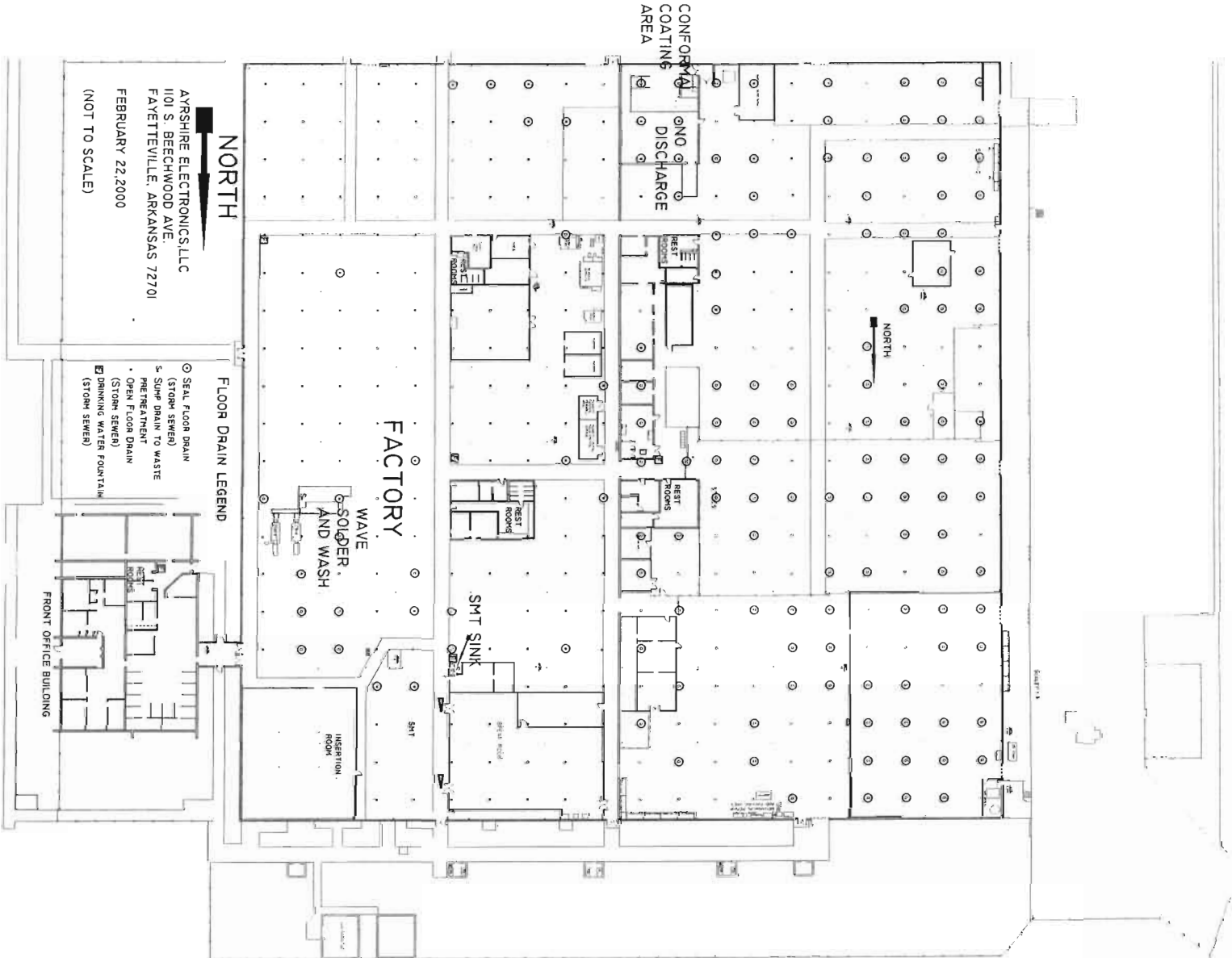
- A KESTER SOLDER/FLUX
- A KESTER 5760 ACID NEUTRALIZER
- A KESTER 5768 SAPONIFIER
- A ISOPROPYL ALCOHOL

COATING ROOM:

- B XYLENE
- B CONAP CONFORMAL COATING
- B CONAP THINNER
- B HUMISEAL CONFORMAL COATING
- B HUMISEAL THINNER
- B DOW CORNING COATING
- B DOW CORNING SOLVENT
- B HYSOL CONFORMAL COATING
- B SHIN ETSU CONFORMAL COATING
- B START INTERNATIONAL CONFORMAL COATING AND THINNERS

- A EXPECTED TO BE DISCHARGED TO THE SEWER WITH TREATMENT  
(OUTPUT CHECKED REGULARLY TO ASSURE APPROPRIATE LIMITS)
- B USED, BUT NOT DISCHARGED
- C ON SITE, BUT NOT USED
- D NO LONGER IN STOCK

AYRSHIRE ELECTRONICS, LLC  
 1101 SOUTH BEECHWOOD AVENUE  
 FAYETTEVILLE, AR 72701



AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

**WATER USAGE FROM MARCH 2001 TO MARCH 2002**

<b>MONTH</b>	<b>YEAR</b>	<b>GALLONS</b>
March	2001	430,060
April	2001	348,240
May	2001	361,340
June	2001	301,905
July	2001	306,298
August	2001	389,602
September	2001	427,320
October	2001	441,815
November	2001	313,710
December	2001	268,880
January	2002	243,070
February	2002	158,503
March	2002	164,867
<b>TOTAL (AVG) = 319,662</b>		

For the period from March 2001 to March 2002 the total water usage was 4,155,610 gallons.

JANUARY 4, 2000

**PROCEDURE FOR HANDLING SOLVENTS AND FLAMMABLE LIQUIDS**

**1 STORAGE OF SOLVENTS AND FLAMMABLE LIQUIDS:**

- 1.1 Solvents and flammable liquids are to be stored only in designated areas, approved flammable storage cabinets and/or containers.
- 1.2 Containers must be inspected regularly for wear and leaks. If any are found report them immediately.
- 1.3 Containers are to be kept tightly closed.
- 1.4 Only a one-day supply of a solvent or flammable liquid is to be at a job site except in some cases where one container (e.g. 55-gallon drum) is permitted.
- 1.5 Only authorized personnel are to be permitted in the flammable storage areas.
- 1.6 All containers of solvents and flammable liquids must be labeled with their contents.
- 1.7 Do not store any easily ignitable materials (e.g. paper and rags) in the flammable storage areas.

**2 DISPENSING OF SOLVENTS AND FLAMMABLE LIQUIDS:**

- 2.1 Dispensing of solvents and flammable liquids is to be done only in well-ventilated areas.
- 2.2 Dispensing of solvents and flammable liquids is to be done into approved containers. No glass containers are to be used.
- 2.3 When dispensing flammable liquids the receiving container must be electrically bonded to the dispensing container.
- 2.4 The container used for solvents and flammable liquids are to be properly colored coded and or labeled. Flammable liquid containers are to be painted red or red and yellow and/or labeled FLAMMABLE.

**3 USING SOLVENTS AND FLAMMABLE LIQUIDS:**

- 3.1 Any person having cause to dip their hands in solvent or other chemical must wear gloves to protect their hands.
- 3.2 Employees must not wash their hands in solvent.
- 3.3 Persons handling corrosive chemicals must wear the proper safety equipment.
- 3.4 Only a one-day supply of a solvent or flammable liquid is to be at a job site except as noted in paragraph 1.2, above.
- 3.5 Only approved containers are to be used for solvents and flammable liquids.
- 3.6 Containers of solvents and liquids must be properly identified (2.4, above).
- 3.7 Use solvents and flammable liquids in well ventilated areas.
- 3.8 Do not use flammable liquids near any possible ignition sources.
- 3.9 Rags and other absorbent materials used for flammable liquids are to be discarded into approved safety cans.
- 3.10 Waste cans are to be emptied every evening.
- 3.11 Do not mix chemicals unless you know what will result. When in doubt, don't.
- 3.12 In case of minor spills, clean up the spilled material as soon as possible and dispose of any rags or other material used for the clean up in approved waste cans.
- 3.13. Dispose of excess, out dated or contaminated chemical before they become a problem. Contact the hazardous materials coordinator (Peter West) for disposal of these items.

AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

**4. DISPOSAL OF SOLVENTS AND FLAMMABLE LIQUIDS:**

- 4.1 No solvents, flammable liquids or other chemicals are to be dumped into any drain. This includes, but is not limited to, floor drains, slop sinks, lavatories, drinking fountains, and toilets.
- 4.2 All solvents and flammable liquids that must be disposed of are to be put into approved drums for shipment to an authorized disposal facility.
- 4.3 The barrels of waste solvents and flammable liquids are located outside the factory at the north end of the building in a covered building.
- 4.4 Disposal of the waste materials must be done as stipulated in AYRSHIRE ELECTRONICS, LLC "Guidelines for Handling, Storing, Shipping and Disposal of Hazardous Waste."

**SPILL AND LEAK PREVENTION**

The following steps have been taken to assure that organic pollutants do not get into ground water, surface water or sewage:

1. All drain covers in areas where solvents are stored or used in quantity have been sealed using solid metal plates cemented in silastic.
2. A procedure has been written to cover the handling and disposal of solvents and flammable liquids. The procedure stipulates, among other items, the following:
  - Maximums of one day supplies of solvents at a job site (unless otherwise specifically stated).
  - Approved containers only.
  - No glass containers to be used.
  - Regular inspection of containers for wear and leaks.
  - Proper disposal of solvents.
3. A letter has been distributed to all department supervisors to caution their people about the disposal of solvents.
4. Signs have been posted at all sinks in the factory, (not in restrooms) regarding solvent disposal.



AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

Revision No.: 4  
4-5-2002

AYRSHIRE ELECTRONICS, LLC

Guidelines for Handling, Storing, Shipping and Disposal of Hazardous Waste.

Issued June 1, 1981

Revisions: No. 2 - May 29, 1985  
No. 3 - February 3, 2000  
No. 4 - April 5, 2002

Waste Solvents, Oil and Finishing Material: All plants:

Even though we send our spent solvents to a reclamation facility, EPA still considers them a hazardous waste and we must comply with their regulations for reporting, storage, and transporting.

Arkansas plants will ship their spent solvents, oil and or finishing materials to a proper disposal facility approved by corporate engineers.

Arkansas plants cannot sell their spent solvents or oil to local reclaimers, unless approved by corporate engineers. It is too burdensome to ensure that each local reclaimer is complying with all applicable regulations.

The spent solvent must be shipped in a proper 55-gallon drum (see below for requirements) and D.O.T. requirements must be followed.

Arkansas plants should ship the hazardous waste within a 180 day holding period. This means that once a drum is full the drum should be shipped to a proper disposal facility before 180 days is up.

Before any hazardous waste is shipped, notify Peter West. The penalties for non-compliance with EPA or D.O.T. regulations can be very severe - up to \$25,000.00 per day.

Drum Requirements for Shipping Hazardous Waste:

Before a hazardous waste can be shipped in a drum, the following requirements must be met.

1. It must be an approved metal drum for liquid flammable hazardous Material -bung type (no plastic bungs) or open type with metal lid, metal rim and 5/8" bolt (no Snap-On or light duty bolt on rims) and an approved plastic drum for other hazardous waste material such as solder/adhesive tubes and rags.
2. The drum must be in good condition - not dented, puffed out and/or rusty. If necessary, the drum must be painted to make it look good.

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FAYETTEVILLE, AR 72701

Revision No.: 4  
4-5-2002

3. A 6" x 6" yellow and red hazardous waste label must be affixed to the drum and properly filled in with a waterproof marker.

A. Proper D.O.T shipping name examples:

- (1) Spent solvents: Waste flammable liquid, N.O.S.
- (2) Caustic soda or solvent sludge: Waste flammable liquid, corrosive, N.O.S.

B. UN or NA:

- (1) Spent solvents: UN 1993
- (2) Caustic soda or solvent sludge: UN 2924

C. Generator information:

Fill in name and address of shipping plant

D. EPA I.D. No.: (of generator)

- (1) Fayetteville: ARD006337620

E. EPA waste No. examples:

- (1) Spent solvents: D001, F003, F005
- (2) Caustic soda: D001, D005 (list both)
- (3) Waste with Pb: D008

F. Accumulation start date:

List the date the drum was filled and moved to storage. This date should not be more than 180 days before the shipping date of the drum.

G. Manifest document No.:

List the number of the hazardous waste manifest.  
(This will not be completed until the waste is shipped).

4. A 4" X 4" D.O.T. vinyl label (diamond shape) must be affixed to the drum.

A. Spent solvents: Flammable liquid (red)

B. Caustic soda or solvent sludge: Flammable liquid (red) and corrosive (black and white). Two labels total

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FAYETTEVILLE, AR 72701

Revision No.: 4  
4-5-2002

5. Banding and palletizing requirements for drums:
  - A. All drums, except as stated below, must be palletized and banded with metal bands. A single drum does not have to be palletized, but, multiple drum shipments on common carriers must be palletized and banded. If the treatment/disposal facility sends its own truck, then their driver will supervise the loading of the truck.
  - B. Each palletized load cannot exceed six feet in height. (Three pails high limit on 5-gallon pails).

AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

# REFERENCE



April 16, 2002

Denise Georgiou  
Operations Management International, Inc.  
1500 Fox Hunter Road  
Fayetteville, AR 72701

RE: Wastewater Analysis Report for March 2002

Dear Ms. Georgiou:

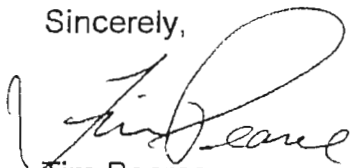
Enclosed is the Wastewater Analysis report for our site for the month of March.

These results are from unfiltered samples. The parameters covered in this report are within the specified limits of our permit. We plan to continue with unfiltered discharge at this time.

Also included are copies of laboratory results and the chain of custody.

Call me if you have any questions regarding this report.

Sincerely,



Tim Pearce  
Engineering Manager

cc: Peter West

AYRSHIRE ELECTRONICS, LLC  
1101 SOUTH BEECHWOOD AVENUE  
FAYETTEVILLE, AR 72701

Discharge Location: AYR001  
Permit Number: FAY 15

REPORT OF WASTEWATER FOR THE MONTH OF:

March 2002

PARAMETER	LIMITATIONS, DAILY MAXIMUM	DATE OF SAMPLE:	RESULTS:		WITHIN LIMITS: (YES/NO)
			(mg/l)	(lbs)	
Cadmium, T (lbs)	0.004	03/15/02			YES
Chromium, T (lbs)	0.011	03/15/02			YES
Copper, T (lbs)	0.339	03/15/02	0.06	0.004	YES
Lead, T (lbs)	0.188	03/15/02	0.13	0.009	YES
Nickel, T (lbs)	0.005	03/15/02			YES
Silver, T (lbs)	0.036	03/15/02			YES
Zinc, T (lbs)	0.038	03/15/02			YES
Total Toxic Organics (mg/l)	2.13				

WASTEWATER FLOW (gallons):

MONTHLY TOTAL: 61,004  
MONITORING DAY: 8,212  
DAILY AVERAGE: 3,050

WATER USAGE (gallons):

MONTHLY TOTAL: 164,867  
MONTHLY AVG: 8,243

*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."

Contact Person: Tim Pearce  
Title: Engineering Manager

Phone: (501) 442-5356

Signed: \_\_\_\_\_



Date: \_\_\_\_\_

4/16/02

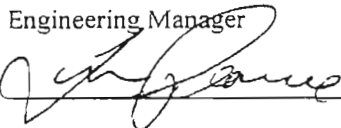
*TTO Certification Statement:*

"Based on my inquiry of the persons directly responsible for managing compliance with the permit limitations for total toxic organics (TTO), 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 discharge monitoring report. I further certify that this facility is implementing the toxic organics management plan submitted to the control authority."

Contact Person: Tim Pearce  
Title: Engineering Manager

Phone: (501) 442-5356

Signed: \_\_\_\_\_



Date: \_\_\_\_\_

4/16/02

I-29/31



# LNS ENVIRONMENTAL SERVICES, INC.

903 North Bowser, Suite 230  
Richardson, Texas 75081  
(972) 699-3772

Visit us at [www.lnsenv.com](http://www.lnsenv.com)

Environmental  
Specialist  
Fax: (972) 669-3575

## McCLELLAND CONSULTING ENGINEERS

P.O. BOX 1229  
FAYETTEVILLE, AR 72702  
ATTN: MR. FRED STEPHENS

DATE RECEIVED : 03/20/02  
DATE REPORTED : 03/28/02  
REPORT NUMBER : 0261-02

SAMPLE ID: AYRESHIRE ELECTRONICS – FY904518

3/15/02

### TOTAL METALS

PARAMETERS	EPA METHOD	DETECTION LIMIT mg/L	RESULTS mg/L	ANALYST	DATE ANALYZED
Copper	200.7	0.01	0.06	DKB	03/21/02
Lead	200.7	0.01	0.13	DKB	03/21/02

### QUALITY CONTROL DATA

Parameter	Analyst	Analysis Date	EPA Method	% Spike Recovery	% RPD
Copper	DKB	03/21/02	200.7	97	1
Lead	DKB	03/21/02	200.7	91	1

  
Niranjana Shah

LNS ENVIRONMENTAL SERVICES, INC.

I-29/B

CHAIN OF CUSTODY

Company Name: Ayshire Electronics Contact: Tim Pearce  
Address: 1101 S. Beechwood Ave Telephone: 442-5356  
Fayetteville Ar. Sampler(s): Stan Sumter  
72701 Grab:   
Composite:

Date/Time Composite Taken: 3-15-02 9:20 AM TO 1:45 PM  
Date/Time Grab Taken:   
Sample ID/Location: Flume

Flow 8212 DO   
Number of Containers: 1

Reservation Occurred:  At Collection  At Lab

Container	Plastic/Glass	Preservation
1	Plastic	HNO3
2		
3		
4		
5		
6		

Relinquished By: [Signature] Date/Time: 3/19/02 9:50am  
 Received By: [Signature] Date/Time: 3/19/02 0950  
 Relinquished By: [Signature] Date/Time: 3/19/02 1410  
 Received By: [Signature] Date/Time: 3/19/02 1410

Comments:

Calibration: actual/observed  actual observed   
Dissolved Oxygen calibration: Zero  Full Scale  Elevation



I-30/31

# CHAIN OF CUSTODY

261-2

McClelland Consulting Engineers, Inc.

Contact: Fred Stephens

P.O. Box 1229

Telephone: 501-443-2377

Fayetteville, AR 72702

Fax: 501-443-9241

Sampler(s): Stan Sumner

Grab: \_\_\_\_\_

Composite: X

Date/Time Composite Taken: 03/15/02 0920 - 1345

Date/Time Grab Taken: \_\_\_\_\_

Sample ID/Location: Ayreshire Electronics - FY904518

pH \_\_\_\_\_

DO \_\_\_\_\_

Flow \_\_\_\_\_

Number of Containers: 1

Preservation Occurred: X At Collection \_\_\_\_\_ At Lab

Container

Plastic/Glass

Preservation

1

One Plastic 250 mL

HNO<sub>3</sub>

2

3

4

5

6

Relinquished By: Fred Stephens

Date/Time: 3/19/02 1500

Received By: R M PATEL R M Patel

Date/Time: 3-20-02 9:45 AM

Comments: PLEASE FAX RESULTS!!! Please analyze for Pb, Cu.

Thank you! Please use 0.01 mg/L detection limits.

1780329



**TITLE V PUBLIC WORKS  
CHAPTER 51: WATER AND SEWERS**

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## CHAPTER 51: WATER AND SEWERS

### ARTICLE I WATER USAGE REGULATIONS

#### 51.001 Water Shortages

(A) *Definitions.* For the purpose of this section the following definitions shall apply unless the context clearly indicates or requires a different meaning.

*Person.* Any person, firm, partnership, association, corporation, company, or organization of any kind.

*Water.* Water from the city water supply system.

(B) The provisions of this section shall apply to all persons using water both in and outside the city.

(C) The mayor, or his/her duly authorized representative, is hereby authorized to prohibit the use and withdrawal of water by any person when there is an impending shortage of water for any one or more of the following purposes:

(1) *Watering yards.* The sprinkling, watering, or irrigation of lawns, grass, or ground cover.

(2) *Watering other vegetation.* The sprinkling, watering, or irrigation of shrubbery, trees, plants, vines, gardens, vegetables, flowers, or any other vegetation.

(3) *Washing mobile equipment.* The washing of automobiles, trucks, trailers, trailer-houses, railroad cars, or other types of mobile equipment.

(4) *Cleaning outdoor surfaces.* The washing of sidewalks, driveways, filling station aprons, porches, and other outdoor surfaces.

(5) *Cleaning buildings.* The washing of the outside of dwellings; the washing of the inside and outside of office buildings.

(6) *Ornamental fountains.* The operation of any ornamental fountain or other structure making a similar use of water.

(7) *Swimming pools.* Swimming and wading

pools not employing a filter and recirculating system.

(D) Notice of prohibitions shall be published once in a newspaper of general circulation in the city.

(E) The county sanitarian shall have the authority to permit a reasonable use of water in any case necessary to maintain adequate health and sanitation standards.

(F) The water and wastewater director shall have available and furnish all records necessary to determine the usages of water restricted under the terms of this section.

(G) Every police officer of the city shall, in connection with his duties imposed by law, diligently enforce the provisions of this section.

(H) The mayor or his/her duly authorized representative shall have the authority to enforce the provisions of this section by the discontinuance of water service in event of violation hereof.

(Code 1965, §§21-1.1--21-1.8; Ord. No. 1757, 8-17-70; Code 1991, §51.001)

**Cross reference(s)--Penalty, §51.999.**

**State law reference(s)--**Cities of the first class--Operation by city in governmental capacity, A.C.A. §14-234-107; Powers of municipalities, A.C.A. §14-42-307; Public utilities and carriers, A.C.A. §14-43-609.

#### 51.002 Water Meters

(A) *Installation.* Meters shall be installed at each connection with the city's water works system. The city shall operate and maintain all meters, whether owned by it or privately owned.

(B) *Tampering with meters.*

(1) It shall be unlawful for any person to tamper with any water meter furnished by the city, by breaking the seal of same with the intention of changing or altering the mechanism of such meter, or by changing or altering in any manner the mechanism of such meter. Nothing in this section shall be so construed as to prevent any employee of

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- (1) A user subject to categorical pretreatment standards; or
- (2) A user that:
  - (a) Discharges an average of 25,000 gpd or more of process wastewater to the POTW (excluding sanitary, noncontract cooling, and boiler blowdown wastewater); or
  - (b) Contributes a process wastestream which makes up 5% or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or
  - (c) Is designated as such by the control authority on the basis that it has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement.
- (3) Upon a finding that a user meeting the criteria in (2) has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the control authority may at any time, on its own initiative or in response to a petition received from a user (and in accordance with procedures in 40 C.F.R. pt. 403.8(f)(6)) determine that such user should not be considered a significant industrial user.

*Slug load or slug.* Any discharge at a flow rate or concentration which could cause a violation of the prohibited discharge standards in this article or any discharge of a nonroutine, episodic nature, including but not limited to, an accidental spill or a noncustomary batch discharge.

*Standard Industrial Classification (SIC) Code.* A classification pursuant to the *Standard Industrial Classification Manual* issued by the United States Office of Management and Budget.

*State.* State of Arkansas.

*Storm water.* Any flow occurring during or following any form of natural precipitation, and resulting from such precipitation, including snowmelt.

*Surcharge.* A service charge in addition to the normal monthly rate which shall be assessed to the significant industrial users who discharge into the city system wastewater having an average BOD concentration in excess of 300 milligrams per liter or an average TSS concentration in excess of 300 milligrams

per liter.

*Total suspended solids.* The total suspended matter that floats on the surface of, or is suspended in, water, wastewater, or other liquid, and which is removable by laboratory filtering.

*Toxic pollutant.* Any pollutant or combination of pollutants listed as toxic in regulations promulgated by EPA under §307 (33 U.S.C. §1317) of the Act.

*Treatment plant's effluent.* The discharge from the POTW into the receiving stream.

*User.* Any person who contributes or permits the contribution of wastewater into the POTW.

*Wastewater.* Liquid and water-carried industrial wastes and sewage from residential dwellings, commercial buildings, industrial and manufacturing facilities, and institutions.

*Wastewater treatment plant.* That portion of the POTW which is designed to provide treatment of municipal sewage and industrial waste.

(Ord. No. 3965, §§2, 3 (Exh. A), 5-7-96; Ord. No. 4088, §2, 4-7-98; Code 1991, §51.074)

### 51.075 General Sewer Use Requirements

(A) Wastewater generated by development located in 100-year floodplain not to be transported or treated by facilities constructed under EPA Project No. C-050366-01 for 50 years.

(1) For the purpose of this section area of existing development shall mean an area which, at the EPA issued a finding of no significant impact for EPA Project No. C-050366-01 was:

(a) Occupied by existing structures or facilities;

(b) Substantially surrounded by existing structures or facilities and which serves no significant independent natural floodplain function; or

(c) Characterized by substantial investment in public infrastructure but which is only partially occupied by structures or facilities.

(2) No wastewater generated by development located in the 100-year floodplain shall be transported or treated by facilities



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constructed under EPA Project No. C-050366-01 for a period of 50 years from January 1, 1987, except that service may be provided to:

- (a) Areas of existing development in a floodplain;
- (b) Commercial or public facilities which by nature must be located in a floodplain;
- (c) Areas of projected growth if the environmental information document for EPA Project No. C-050366-01 demonstrates that proposed development will be consistent with the floodplain management criteria for flood-prone areas (44 C.F.R. pt. 60.3) of the Federal Emergency Management Agency (FEMA) and will have no significant impacts on natural functions and values of the floodplain; or
- (d) An area of projected growth if an environmental impact statement demonstrates that there is no practicable alternative to such growth, that such growth will be consistent with the floodplain management criteria for flood-prone areas (44 C.F.R. pt. 60.3) of FEMA, and that the benefits of such growth outweigh its environmental costs.

(B) *Prohibited discharge standards.*

(1) *General prohibitions.* No person shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes pass through or interference. These general prohibitions apply to all users of the POTW whether or not they are subject to categorical pretreatment standards or any other federal, state, or local pretreatment standards or requirements.

(2) *Specific Prohibitions.* No person shall introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:

- (a) Pollutants which create a fire or explosive hazard in the POTW, including, but not limited to, ~~wastestreams with a closed-cup flashpoint of less than 140° Fahrenheit (60° C) using the test methods specified in 40 C.F.R. pt. 261.21;~~
- (b) Wastewater having a pH less than 5.0 or

more than 12.5, or otherwise causing corrosive structural damage to the POTW or equipment;

- (c) Solid or viscous substances including, but not limited to, fats, oil or grease of animal or vegetable in amounts which will cause obstruction of the flow in the POTW resulting in interference but in no case solids greater than one-half inch in any dimension;
- (d) Pollutants, including oxygen-demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW;
- (e) Wastewater having a temperature greater than 150° Fahrenheit (65° C), or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104° Fahrenheit (40° C);
- (f) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass through;
- (g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- (h) Trucked or hauled pollutants, except at discharge points designated by the control authority in accordance with §51.076(D) of this article;
- (i) Any liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or a hazard to life, or to prevent entry into the sewers for maintenance or repair;
- (j) Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, dye, wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating the city's NPDES permit;

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- (k) Wastewater containing any radioactive wastes or isotopes except in compliance with applicable federal or state regulations and approved by the control authority;
- (l) Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, condensate, deionized water, noncontact cooling water, and unpolluted wastewater, unless specifically authorized by the control authority;
- (m) Sludges, screenings, or other residues from the pretreatment of industrial wastes;
- (n) Medical wastes, except as specifically authorized by the control authority;
- (o) Wastewater causing, alone or in conjunction with other sources, the POTW to violate its NPDES permit or the treatment plant's effluent to fail a toxicity test;
- (p) Any substance which may cause the POTW's effluent or other product of the POTW such as residues, sludges or scums, to be unsuitable for normal landfill/land application, reclamation or reuse, or to interfere with the reclamation process;
- (q) Detergents, surface-active agents, or other substances which may cause excessive foaming in the POTW;
- (r) Any material into a manhole through its top unless specifically authorized by the control authority.

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

(C) *Categorical pretreatment standards.* The categorical pretreatment standards found at 40 C.F.R. Chapter I, Article N, pts. 405-471 are hereby incorporated.

- (1) Where a categorical pretreatment standard is expressed only in terms of either the mass or the concentration of a pollutant in wastewater, the control authority may impose equivalent concentration or mass limits in accordance

with 40 C.F.R. pt. 403.6(c).

- (2) When wastewater subject to a categorical pretreatment standard is mixed with wastewater not regulated by the same standard, the control authority shall impose an alternate limit using the combined wastestream formula in 40 C.F.R. pt. 403.6(e).
  - (3) A user may obtain a variance from a categorical pretreatment standard if the user can prove, pursuant to the procedural and substantive provisions in 40 C.F.R. pt. 403.13, that factors relating to its discharge are fundamentally different from the factors considered by EPA when developing the categorical pretreatment standard.
  - (4) A user may obtain a net gross adjustment to a categorical standard in accordance with 40 C.F.R. pt. 403.15.
- (D) *Local limits.* The following pollutant limits are established to protect against pass through and interference. No person shall discharge wastewater containing in excess of the following instantaneous maximum allowable discharge limits except by permit from the control authority:
- 0.68 mg/l arsenic
  - 0.02 mg/l cadmium
  - 0.48 mg/l chromium
  - 0.23 mg/l copper
  - 0.01 mg/l cyanide
  - 0.15 mg/l lead
  - 0.0002 mg/l mercury
  - 0.20 mg/l nickel
  - 1.23 mg/l silver
  - 1.52 mg/l zinc

The above limits apply at the point where the wastewater is discharged to the POTW. All concentrations for metallic substances are for "total" metal unless indicated otherwise. The control authority may impose mass limitations in addition to, or in place of, the concentration-based limitations above.

The city may revise or modify the local limits as required, or if deemed necessary to comply with the objectives presented in §51.070 of this article or the general and specific prohibitions in §51.075(B) of this article, or to insure compliance with federal, state, or local law.

(E) *Right of revision.* The city reserves the right to establish, by ordinance or in wastewater

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discharge permits, more stringent standards or requirements on discharges to the POTW.

wastewater discharge permit may be issued solely for flow equalization.

- (F) *Dilution.* No user shall ever increase the use of process water, or in any way attempt to dilute a discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a discharge limitation unless expressly authorized by an applicable pretreatment standard or requirement. The control authority may impose mass limitations on users which are using dilution to meet applicable pretreatment standards or requirements, or in other cases when the imposition of mass limitations is appropriate.

- (3) Grease, oil, and sand interceptors shall be provided when, in the opinion of the control authority, they are necessary for the proper handling of wastewater containing excessive amounts of grease and oil, or sand; except that such interceptors shall not be required for residential users. All interception units shall be of type and capacity approved by the control authority and shall be so located to be easily accessible for cleaning and inspection. Such interceptors shall be inspected, cleaned, and repaired regularly, as needed, by the user at the user's expense.

(Ord. No. 3965, §§2, 3, Exh. A, 5-7-96; Ord. No. 4088, §3, 4-7-98; Code 1991, §51.075)

### 51.076 Pretreatment Of Wastewater

- (A) *Pretreatment facilities.* Users shall provide wastewater treatment as necessary to comply with this article and shall achieve compliance with all pretreatment standards, local limits, and the prohibitions set out in §51.075(B) of this article within the time limitations specified by EPA, the state, or the control authority, whichever is more stringent. Any facilities necessary for compliance shall be provided, operated, and maintained at the user's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the control authority for review, and shall be acceptable by the control authority before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the user from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the control authority under the provisions of this article.

- (4) Users with the potential to discharge flammable substances may be required to install and maintain an approved combustible gas detection meter.

- (C) *Accidental discharge/slug control plans.* At least once every two years the control authority shall evaluate whether each significant industrial user needs an accidental discharge/slug control plan. The control authority may require any user to develop, submit for approval, and implement such a plan. An accidental discharge/slug control plan shall address, at a minimum, the following:

- (B) *Additional pretreatment measures.*

- (1) Whenever deemed necessary, the control authority may require users to restrict their discharge during peak flow periods, designate that certain wastewater be discharged only into specific sewers, relocated and/or consolidate points of discharge, separate sewage wastestreams from industrial wastestreams, and such other conditions as may be necessary to protect the POTW and determine the user's compliance with the requirements of this article.

- (1) Description of discharge practices, including nonroutine batch discharges;  
(2) Description of stored chemicals;  
(3) Procedures for immediately notifying the control authority of any accidental or slug discharge, as required by §51.079(F) of this article. Such notification must also be given for any discharge which would violate any of the prohibited discharges in §51.075(B) of this article; and

- (2) The control authority may require any person discharging into the POTW to install and maintain, on their property and at their expense, a suitable storage and flow-control facility to ensure equalization of flow. A

- (4) Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.

- (D) *Hauled wastewater.*

Table 2-1. Residential Sewage Flows  
 as Ratios to the Average

Flow	Ratio
Maximum daily	2.25 to 1
Maximum hourly	3.00 to 1
Minimum daily	0.67 to 1
Minimum hourly	0.33 to 1

Table 2-2. Typical Characteristics of Domestic Sewage  
 (mg/l unless noted otherwise)

Parameter	Amount		
	High	Average	Low
BOD <sub>5</sub>	350	200	100
COD	800	400	200
TOC	300	200	100
pH (units)	7.5	7.0	6.5
Total solids	1200	700	400
Suspended, total	350	200	100
Fixed	100	50	25
Volatile	250	150	75
Dissolved, total	850	500	300
Fixed	500	300	200
Volatile	350	200	100
Settleable solids (ml/l)	20	10	5
Total nitrogen (as N)	60	40	20
Free ammonia (as NH <sub>3</sub> )	30	15	10
Total phosphorus (as P)	20	10	5
Chlorides (as Cl)	150	100	50
Sulfates (as SO <sub>4</sub> )	40	20	10
Alkalinity (as CaCO <sub>3</sub> )	350	225	150
Grease	150	100	50

K-1/1