ADEQ

ARKANSAS
Department of Environmental Quality

JUL 10 2013

Tom Meyer, Pretreatment Coordinator
City of Siloam Springs
P O Box 80
Siloam Springs, AR 72761

Re: City of Siloam Springs (AFIN 04-00106 NPDES #AR0020273) Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Meyers:

Please find enclosed the finished report for the audit/assessment conducted June 18 through June 20, 2013. The report should be made available for review to appropriate industrial officials. The City of Siloam Springs 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 staff's assistance. The staff 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 Siloam Springs pretreatment program with achieving the objectives of the Clean Water Act.

If the City has questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us .

Sincerely,

Rufus J. Torrence, Water Division Engineer

Encl: Audit/Assessment Checklist

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

PRETREATMENT PROGRAM AUDIT

POLLUTION PREVENTION ASSESSMENT

SILOAM SPRINGS, ARKANSAS

NPDES PERMIT #AROO22039

JULY 15, 2013

AUDITOR: RUFUS TORRENCE

WATER DIVISION ENGINEER II

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 Northshore Drive

NORTH LITTLE ROCK, ARKANSAS 72118

TABLE OF CONTENTS

A) Introduction

B) Summary of Findings with Required Actions

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

D) Required Program Modifications to the Approved Pretreatment Program Necessary to Bring the Program Into Compliance with the Letter or Intent of the Current Regulatory Requirements

LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summary

Attachments: Supporting Documentation

A - Application for Industrial Waste Permit-Simmons
B - Permit (Simmons) & Permit Excerpts (Gates/Cobb)
C - Monitoring Report-Simmons
D - Inspection Report-Simmons
E - Loadings-Influent Conv Pollutant Monthly Report for April 2013
F - ICIS Violation Report
G - WET Summary
H - Fact Sheet-Simmons Permit
I - Design Criteria for WWTP by Garver Engineers
J - Application-Sample from 2012 IU Permit Guidance Manual

A) INTRODUCTION

Synopsis: Under Arkansas Department of Environmental Quality (ADEQ or Department) responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

With Pollution Prevention (P2) being integrated into Pretreatment Programs, the auditor also assessed the city's P2 projects.

The auditor performed from June 18 through 20, 2013 an assessment of the Pretreatment Program implemented by the City of Siloam Springs, Arkansas.

Participants included:

Rufus Torrence	ADEQ/Engineer & Auditor
Tom Meyers	WWTP Superintendent / Pretreatment Coordinator

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Siloam Springs' 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

Discussion: EPA originally approved the City of Siloam Springs Pretreatment Program on August 22, 1984. The Department approved two modifications and incorporated the first modification into the City's NPDES permit on March 3, 2000. The last modification upgraded the pretreatment program to comply with the Streamlining Rule to 40 CFR Part 403 promulgated on October 14, 2005. The Department is currently holding the City's expired NPDES permit pending the development of TMDLs for nutrients. When the new permit is issued, the Department will incorporate the streamlining modification into the new permit.

The existing treatment plant processes were recently updated and, presently, include clarifiers, activated sludge with biological/chemical nutrient removal, final clarifiers and chlorine disinfection. The effluent is discharged into Sager Creek in Segment 3J of the Arkansas River Basin, thence into Flint Creek and thence into the Illinois River. The POTW effluent has had no biomonitoring failures since the last pretreatment audit in June 2010.

The plant design flow is 5.3 MGD but the average flow was about 2.7 MGD for the previous year. A poultry facility (Simmons) contributes about half of the average daily flow while the other SIUs contribute less than 1 % of the average daily flow. All the metals and cyanide concentrations in the influent appear to be at typical domestic levels (including copper). The City's Water Department is using Copper Sulfate to control algae in the distribution system. An inadvertent slug of Copper Sulfate entered the POTW in June 2012 which pass-through the treatment plant. Numerical local limits for metals and cyanide appear unnecessary for the SIUs at this time, but the City should consider BMPs instead. BMPs can not only preserve SIU pollutant loadings to the POTW at current levels but also help reduce pollutant loadings in the future. Even though Total Phosphorus (TP) appears to be entering the POTW at typical domestic levels (around 6 mg/l), the City may currently have to consider additional methods to reduce the TP headworks loading. Finally, the POTW has "local limits" for BOD and TSS in the current SIU permits. The Department cannot find a firm technical basis for these "local limits".

The audit consisted of informal discussions with the City's Pretreatment personnel, examination of SIU files, the pretreatment records at the treatment plant and, finally, site visits to the SIUs. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachments A through J.

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 Siloam Springs. Section C includes recommendations to help improve the City's implementation and enforcement of the Pretreatment and Pollution Prevention Programs. Finally, Section D outlines the required program modifications to the City's approved program, including its adopted legal authorities.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is usually a summary of deficiencies found in the City's Pretreatment Program. This section is reserved and the Department will not require actions from the City at this time.

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

1) The City should immediately modify each permit to show the correct legal authority since the permits do not expire until May 2016. The current permits show "Ordinance No. 00-11" which was pre-empted by Ordinance No. 12-05 on June 19, 2012. The Simmons permit (see Attachment B) references "Ordinance No. 00-11" on most of the pages in the permit. The Department recommends that the City cites "Chapter 98; Utilities; Article V-Industrial Pretreatment" of the municipal codes instead of citing an ordinance. The cite (Article V) will always be correct when old ordinances are repealed or voided.

2) The Department has provided the City with a copy of the new EPA "*Industrial User Permitting Guidance Manual 833-R-12-001A September 2012*". The City should consider consolidating the current hybrid application (see Attachment A-1/15 & A-3/15) which is a combination of a short application form and an Industrial Waste Discharge Questionnaire. The Department recommends that the City use the sample application shown in Appendix C (see Attachment J) as a template for future applications.

3) The Streamlining regulations promulgated on October 14, 2005 [40 CFR 403.5(d)] states that BMPs (when properly approved by ADEQ and incorporated into SIU permits) shall be considered local limits and Pretreatment Standards. Hence, BMPs incorporated into SIU permits are not only enforceable by local law but also by state and federal law. The City should consider implementing BMPs to control the existing SIUs and maintain the headwork loading at its present level. In accordance with 40 CFR 403.12(h), at least once every six months, each SIU with a BMP must submit a report with sampling and analysis to the City to verify that the pollutant loadings from the SIU continue at the previous levels or decreases. The report is not required if the City performs the sampling and analysis and makes the determination.

4) If the City decides to include BMPs in SIU permits, the City should allow each SIU with a proposed BMP the opportunity to comment before issuing the permits. If the City does incur a problematic SIU which contests the BMP or whose loading to the POTW increases significantly after the BMP become effective, the City may consider Performance Based local limits (PBLL) to control the problematic SIU. PBLLs are based on the historical data of the SIU's effluent and the City can consider only the monitoring data submitted before the loadings increased significantly. Finally, the City has the option to implement both BMPs and PBLLs for all SIU permits at this time.

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 Department is not requiring any program modifications at this time.

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information .....Pages 1- 4
Section II: Pretreatment Program Analysis .....Pages 5-17
Section III: Industrial User File Evaluation .....Pages 18-25

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: *City of Siloam Springs* NPDES #: *AR0020273*
Mailing address: *P. O. Box 80, Siloam Springs, 72761*

Permit Signatory: *Tom Meyers* Title: *Superintendent / Manager*

Telephone: *(479) 524-5136* FAX NUMBER: *(479) 238-0997*

Pretreatment Contact: *Tom Meyers* Title: *Pretreatment Coordinator*
Address: *(same)*

Telephone: *(479) 524-5623* E-Mail address: *tmyers@siloamsprings.com*

Pretreatment program approval date: *August 22, 1984*

Dates of approval of any substantial modifications: *March 3, 2000*

Month Annual Pretreatment Report Due: *August*

Pretreatment Year Dates: *July 1st to June 30th* Date(s) of Audit: *June 18-20, 2013*

(ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
**Tom Meyers*	*WW Supt/Pretreatment Coor*	*(479) 524-5623*

* Program Primary Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	*12-2011*	*Problems with Gates Rubber Co flow meter*

YES NO

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

If yes, describe the required corrective action:

___ ✓ Is the Control Authority currently in SNC or RNC?

.....

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

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0020273	Siloam Springs	10-01-2007	09-30-2012**

* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.
***Permit is currently on hold pending future TMDLs for nutrients.*

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Siloam Springs POTW

Location Address: PO Box 80, Sec 36/T18N/R34W, Benton Co.

Expiration Date of NPDES Permit: 09-30-2012

Treatment Plant Wastewater Flow: Design- 5.3 MGD; Actual (Average)- 2.69 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 3 # of CIUs : 1
Industrial Flow (mgd): 0.84 Industrial Flow (%) : 31.1 %

Level of Treatment		Type of Process(es):
Primary	✓	Circular Clarifiers
Secondary	✓	Activated Sludge/Biological & Chemical Nutrient Removal*
Tertiary	✓	Final Clarification

*BNR & CNR (Aluminum Sulfate (Alum)) installed to meet 1 mg/l phosphorus limit and future TMDL for TP

Method of Disinfection: Chlorination

Dechlorination ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Sager Creek to Flint Creek to Illinois River

Receiving Stream Classification: Segment 3J of Arkansas River Basin

Receiving Stream Use: Fishable/swimmable; primary/secondary contact

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

Method of Sludge Disposal:		Quantity of Sludge:
____	Land Application	____ dry tons/yr.
____	Incineration	____ dry tons/yr.
____	Monofill	____ dry tons/yr.
✓	Mun. Solid Waste Landfill	909 dry tons/yr.*
____	Public Distribution	____ dry tons/yr.
____	Lagoon Storage	____ dry tons/yr.
____	Other (specify)	____ dry tons/yr.

*Sludge Quantity taken from EPA ICIS Envirofacts report-Copy in D:/POTW/Audits/SSPS.

List of toxic pollutant limits in NPDES permit: Copper*

*Copper NPDES permit limit based on Oklahoma WQS.

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for ***City of Siloam Springs*** 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: _____
Issuance Date: _____
Expiration Date: _____

The Sludge is taken to a landfill in Tonitown (ADEQ Solid Waste Permit No. 290-SI-RI; AFIN 72-00144)

List pollutants that are specified in current sludge permit: ***N/A***

YES	NO	N/A	
✓	___	___	Has the Control Authority submitted results of whole effluent biological toxicity testing.
___	✓	___	Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?)

The WET testing (based on Pass/Fail) had no lethal or sub-lethal failures since the last audit in June 2010.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	2[1]	
Priority **	1	1		
Biomonitoring		4		
TCLP			2[1]	
Other: _____				

** As identified at 40 CFR 122, Appendix D, Table III, ** As identified at 40 CFR 122, Appendix D, Table II*
[1]Sludge is taken to Tonitown Landfill; see page 7 in permit renewal application.

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.

Nutrients in effluent have decreased significantly after plant upgrade to remove TP (TP decreased from over 150 lbs/day to less than 5 lbs/day)

YES	NO	N/A	
✓	___	___	Has the POTW begun tracking the trends in the above samples?
✓	___	___	Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated	Cause(s)
None	

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. **(see below)**

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
10-26-2012	***Ord No. 12-05/Streamlining Update***	*10-26-2012*

2. Modifications in Progress:

Date Requested	Nature of Modification
Pending	***Evaluation of Local Limits on Hold per Mo Shafii's directive to wait***

YES	NO	
___	✓	Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:
✓	___	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: **08/22/1984** [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: **06/2012**
Date of most recent Pretreatment Program modification approval: **10/2012**

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

YES	NO	
✓	___	Deny or condition pollutant discharges
✓	___	Require compliance with standards
✓	___	Control discharges through permit or similar means
✓	___	Require compliance schedules and IU reports
✓	___	Carry out inspection and monitoring activities
✓	___	Obtain remedies for noncompliance
✓	___	Comply with confidentiality requirements
___	✓	Establish Pollution Prevention
___	✓	Has the city developed and adopted a Pollution Prevention policy?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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:

N/A Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

N/A Have provisions been made for the incorporation of Pollution Prevention (P^2) policies by contributing jurisdictions?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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. ***N/A***			
2.			
3.			

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

		Problems
___	Updating industrial waste survey	***N/A***
___	Notification of IUs	
___	Permit issuance	
___	Receipt and review of IU reports	
___	Inspection and sampling of IUs	
___	Assessment of IUs for P^2 activity	
___	Analysis of samples	
___	Enforcement	
___	Other: _____	

Briefly describe other problems: _____

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
N/A			

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

✓ ___ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

✓ ___ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?

___ ✓[1] 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)]

[1]*Siloam Springs is a small community (pop. <15,500) and CA is well informed on new and existing IUs.*

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

N/A

What methods are used to update the IWS:

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

How often is the survey to be updated? ***Continuous***

Are there any problems that the Control Authority has in identifying and categorizing SIUs: ***None***

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?
N/A		

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

a. ***3*** SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. ***1*** Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. ***2*** Noncategorical SIUs
d. 0 Other regulated nonsignificant IUs (Describe) _____
3 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: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

[1]Control Authority has recently updated the program to include BMP requirements for permits and local limits. Presently, the permit applications do not ask for BMP information; however, on June 20, 2013 the Control Authority downloaded a copy of EPA new permitting manual with application examples of the P2 and BMP assessments.

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

What is the maximum term of the control mechanism? ***Five Years***

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

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	
___	___	Does Control Mechanism designate a discharge point? [403.5(b)(8)]
___	___	Are all applicable categorical standards and local limits applied to trucked wastes ?

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

Pollutant	Limit
N/A	

Describe the discharge point(s) (including security procedures): ***N/A***

___ ✓ Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?

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

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

Pollutant	Limit

SECTION II: PROGRAM ANALYSIS AND PROFILE

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?

Jan 10, 2009 Date Notified ***Letter*** Method of Notification

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

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

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change

YES NO

✓[1] ___ 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)]

[1]***Control Authority adopted ADEQ MAHLs/MAHCs shown in ADEQ TBLL 20090902.***

		Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
		Yes	No	Yes	No	Yes	No	
Arsenic (As)		___	___	___	___	___	___	_____
Cadmium (Cd)		___	___	___	___	___	___	_____
Chromium-Total		___	___	___	___	___	___	_____
Copper (Cu)		___	___	___	___	___	___	_____
Cyanide (CN)		___	___	___	___	___	___	_____
Lead (Pb)		___	___	___	___	___	___	_____
Mercury (Hg)		___	___	___	___	___	___	_____
Molybdenum (Mo)	*	___	___	___	___	___	___	_____
Nickel (Ni)		___	___	___	___	___	___	_____
Selenium (Se)	*	___	___	___	___	___	___	_____
Silver (Ag)		___	___	___	___	___	___	_____
Zinc (Zn)		___	___	___	___	___	___	_____

The City adopted the Maximum Allowable Headworks Loadings/Concentrations shown in ADEQ TBLL Excel Spreadsheet dated 09-18-2009.

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

NOT APPLICABLE

YES NO

✓[1] ___ Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

[1]*CA is considering local limits for Phosphorus and Nitrogen; certain IUs have already been identified and have volunteered to reduce the P and N loadings to the POTW.*

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

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

NOT APPLICABLE

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?

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	*Cites in 2012 IPP Narrative*
Inspections:			
CIUs	*1/yr*	1/year	*page 31, Section IX.C*
Other SIUs	*1/yr*	1/year	*page 31, Section IX.C*
Sampling:			
CIUs	*1/yr*	1/year	*page 31. Section IX.D*
Other SIUs	*1/yr*	1/year	*page 31, Section IX.D*
Reporting:			
CIUs	*2/year*	2/year	*page 25, Section V.E**
Other SIUs	*2/year*	2/year	*page 25, Section V.E**
Self-Monitoring:			
CIUs	*4/year*	2/year	*page 31, Section IX.A*
Other SIUs	*4/year*	2/year	*page 31, Section IX.A*

Section V.E references Section 6 in Ord #12-05 (Article V Division 6)

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

* NOIN- *this is a count of SIUs that are either not inspected OR not sampled in the past 12 months. This is NOT a count of SIUs that were both not sampled and not inspected. Do not count repetitive SIU names more than once.*

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:

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	*ICP-MS*	*American Interplex*
Cyanide	*Spectro*	*"* *"*
Organics	*GC/MS*	*"* *" & Env Testing Group*
Other	*Biomonitoring*	*"* *"*

Were all wastewater samples analyzed by 40 CFR 136 methods?

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe:
POTW relies on labs with ADEQ certification

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

7-16 days Conventionals
7-10 days Metals
2 wks Organics

___ ✓[1] Is there an established protocol clearly detailing sampling location and procedures?

[1] *CA has only 3 SIUs and the inspectors are well familiar with sampling locations, etc.*

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

If yes, explain: _____

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

YES NO

✓ ___ Scheduled compliance monitoring
___ ___ Unscheduled compliance monitoring
✓ ___ Demand monitoring for IU compliance
✓ ___ IU self-monitoring
___ ___ Other:

YES NO

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

I. ENFORCEMENT

YES NO

✓ ___ Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(viii)]

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

YES NO

✓ ___ Describe how the Control Authority will investigate instances of noncompliance

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

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

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

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

✓ Notice or letter of violation ✓ Administrative Order

SECTION II: PROGRAM ANALYSIS AND PROFILE

✓ Setting of compliance schedule
✓ Injunctive relief
✓ Revocation of permit
✓ Fines (maximum amount):

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

✓ Imprisonment
✓ Termination of Service
✓ Other: *When other circumstances warrant*

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

YES NO

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

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

N/A If no, does the Control Authority conduct all of the monitoring?

YES NO N/A
✓ ___ ___ Does the pattern of enforcement conform to the ERP?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? No
NO SIU WAS IN SNC					

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

#	%	
0	0	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [WENDB-MSNC]
0	0	Reporting requirements [WENDB-PSNC]
0	0	Pretreatment compliance schedule [WENDB-SSNC]
0		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

YES	NO	
	✓	**Does the ERP provide for any Pollution Prevention activities as corrective** actions? If so, give some examples. _____

Has the Control Authority experienced any of the following:

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

YES	NO	
✓		**Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]**
	✓	**How many SIUs are currently on compliance schedules? None**
	✓	**Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]**

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

	Number	Amount
Civil	*0*	$
Administrative	*0*	$
Total	*0*	$

SECTION III: INDUSTRIAL USER FILE REVIEW

[WENDB-IUPN]

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
✓[1]		Inspection and Sampling schedule
✓		Monitoring Data
	✓	IU Compliance Status Tracking
		Other: _____

[1] *POTW has only 3 SIUs and annual inspections & sampling are usually performed in the same week for all three.*

Can IU monitoring data can be retrieved by:

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

[2] *POTW serves a small community and has only three SIUs; hence, these attributes provide little or no help.*

✓		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? ***The Control Authority has never had a request for confidentiality and has no formal procedure.***
	✓	Are there significant public or community issues impacting the POTW's pretreatment program?
		If yes, please explain:
✓		Are all records maintained for at least 3 years?

SECTION III: INDUSTRIAL USER FILE REVIEW

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

less than 1 FTE

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:

		Percent of Total Funding
✓	POTW general operating fund	>60%
✓	IU permit fees	< 1%
✓	monitoring charges	9%
✓	industry surcharges	30%
___	other (describe) ___	___
		Total 100%

✓ ___ Is funding expected to continue near the current level? If no, will it:
Increase ____ or Decrease _____
If no, describe the nature of the changes:

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

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

SECTION III: INDUSTRIAL USER FILE REVIEW

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓		Sampling equipment	**ISCO Automatic Sampler**
✓		Safety equipment	**SCBA, Bloodborne Pathogen Program, Lockout Tags, etc.**
✓		Vehicles	**Pick-Up Truck**
✓		Analytical equipment	**Usual Lab equipment and contractor's lab**

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.):
CA has household hazardous waste collection program: Twice per year
CA hosts hazardous waste collection sites and hauls waste to certified landfill in Illinois.

2. Has the source of any toxic pollutants been identified?
If yes, what was found?
(none)

3. Has the POTW implemented any kind of public education program? If yes, describe:
POTW is distributing Pamphlets on Phosphorus and placing ads in local newspaper.

4. Does the POTW have any pollution prevention success stories for industrial users documented? **Yes**. If yes, please attach.
Gates will reuse noncontact cooling water to develop a wet land area.

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
No

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants?
If yes, which of the "Guides to Pollution Prevention" were used?
POTW is using P2 guides that are available online

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name _____ File/ID No. _____
Industry Address _____ Industry Description _____
Industrial Category _____ 40 CFR _____ SIC Code: _____
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) _____

Industry visited during audit:

Comments: _____

FILE #: 2 Industry Name **Gates Rubber** File/ID No. **005**
Industry Address **1801 N. Lincoln, P.O. Box 888**
Industry Description **Manufacturer of Power Transmission Belts**
Industrial Category **Rubber Mfg Subpart G** 40 CFR **428** SIC Code: **3052**
Ave. Total Flow (gpd) **68,000** Ave. Process Flow (gpd) _____

Industry visited during audit: **YES**

Comments: _____

FILE #: 3 Industry Name **Simmons Industries** File/ID No. **001**
Industry Address **601 N. Hico Street, P.O. Box 430**
Industry Description **Poultry Food Processor**
Industrial Category **N/A** 40 CFR _____ SIC Code: **2015**
Ave. Total Flow (gpd) **461,000** Ave. Process Flow (gpd) _____

Industry visited during audit: YES

Comments: **Kill Plant has been removed and the Pet Food Facility is currently closed and being updated.**

FILE #: 4 Industry Name **Cobb-Vantress** File/ID No. **007**
Industry Address **4703 Hwy 412 East, P.O. Box 1030**
Industry Description **Poultry Research (Egg Hatchery)**
Industrial Category **N/A** 40 CFR -- SIC Code: **2015**
Ave. Total Flow (gpd) **24,000** Ave. Process Flow (gpd) _____

Industry visited during audit: **YES**

Comments: **Controlled entry procedures include showering and changing clothes.**

FILE #: 5 Industry Name _____ File/ID No. _____
Industry Address _____
Industry Description _____
Industrial Category _____ 40 CFR _____ SIC Code: _____
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) _____

Industry visited during audit: YES NO

Comments: _____

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization ✓ => Yes X => No N/A => Not Applicable

	N/A	Gates	Sim	Cobbs	N/A
1. Is the IU considered "significant" by the Control Authority?		✓	✓	✓	
2. Is the user subject to categorical pretreatment standards?		✓	X	X	
a. New source or existing source (NS or ES)?		NS[1]	N/A	N/A	
b. Is this IU one identified as having P^2 potential?		X	X	X	

B. Control Mechanism

1. Does the file contain an application for a control mechanism?		✓[2]	✓[2]	✓[2]	
If yes, what is the application date?		04-14-2011	04-18-2011	04-13-2011	
Does it ask for Pollution Prevention information?		N/A	N/A	N/A	
2. Does the file contain a permit?		✓	✓	✓	
Permit Expiration Date?		05-31-2016[3]	05-31-2016[3]	05-31-2016[3]	
Is a fact sheet included?		✓[4]	✓[4]	✓[4]	

Comments:

1. Gates installed regulated operations in Sept 1977 after the NS date of 8-23-74.
2. The application is supplemented by the Industrial Waste Survey. See Attachment A.
3. City intends to have all permits expire on the same date.
4. The City has a "Fact Sheet" in each permit file.
5. The heading shows "Transfer"; it should show "Nontransferability".
6. The BOD and TSS limits appear to have no firm technical basis.
7. See Attachment F-1/1 in the 2010 Audit Checklist for the suggested language.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

SECTION III: INDUSTRIAL USER FILE REVIEW

C. Application of Standards

	N/A	Gates	Sim	Cobbs	N/A
1. **Has the IU been properly categorized?**		✓	✓	✓	
2. Were both Categorical Standards and Local Limits properly applied?		X[8]	X[8]	X[8]	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]		✓	✓	✓	
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]		N/A	N/A	N/A	
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]		N/A	N/A	N/A	
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?		N/A	N/A	N/A	
7. Is the Control Authority applying a bypass provision to this IU?		N/A	N/A	N/A	

Comments:

8. The City presently does not have local limits for toxic pollutants (metals, cyanide, etc.). The Maximum Allowable Headworks Loadings (MAHLs) for common toxic pollutants have been determined and compared with the actual headworks loading. Currently, the common toxic pollutants are entering the POTW at typical domestic levels and all SIUs are discharging these pollutants at domestic levels. Therefore, local limits for these pollutants appear unnecessary at this time. However, the City is applying "local limits" for BOD and TSS. The Department cannot find a firm technical basis for the BOD and TSS "local limits".
9. Referring to Attachment D-1/7, the form list "Contact Name" only instead of "Contact Name/Title".
10. Gates has oil skimmer only.
11. Simmons has two Dissolved Air Floatations (DAF) units in parallel. Currently, Simmons is only using one unit at a time because of reduced flows.
12. [Reserved]
13. The inspection form Cover Page lists only "Facility Description" and has no actual description of the manufacturing operations (See Attachment D-1/7).
14. The inspection form has no specific section for Chemical Handling and Storage procedures.

SECTION III: INDUSTRIAL USER FILE REVIEW

D. Compliance Monitoring Sampling

	N/A	Gates	Sim	Cobbs	N/A
1. Does the file contain Control Authority sampling results for the industry?		✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]		✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vii)]					
a. Name of sampling personnel?		✓	✓	✓	
b. Sample date and time?		✓	✓	✓	
c. Sample type?		✓	✓	✓	
d. Wastewater flow at the time of sampling?		✓	✓	✓	
e. Sample preservation procedures?		✓	✓	✓	
f. Chain-of-custody records?		✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]		✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?		N/A	N/A	N/A	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?		✓	✓	✓	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vii)		✓	✓	✓	
Inspections					
7. Does the IU file contain inspection reports?		✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]		✓	✓	✓	
b. Date of last Inspection		05-21-13	04-04-13	05-15-13	

SECTION III: INDUSTRIAL USER FILE REVIEW

	N/A	Gates	Sim	Cobbs	N/A
9. Does the inspection report(s) include: [403.8(f)(2)(vii)]					
a. Inspector Name(s)		✓	✓	✓	
b. Inspection date and time?		✓	✓	✓	
c. Name and title of IU official contacted?		✓	✓[9]	✓	
d. Verification of production rates?		N/A	N/A	N/A	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?		✓	✓	✓	
f. Evaluation of pretreatment facilities?		✓[10]	✓[11]	N/A	
g. Evaluation of self-monitoring equipment and techniques?		✓	✓	✓	
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(vi)]		✓	✓	✓	
i. Manufacturing facilities?		✓	✓[13]	✓	
j. Chemical handling and storage procedures?		X	X[14]	X	
k. Chemical spill prevention areas?		✓	✓	✓	
l. Hazardous waste storage areas and handling procedures?		✓	✓	✓	
m. Sampling procedures?		✓	✓	✓	
n. Laboratory procedures?		N/A	N/A	N/A	
o. Monitoring records?		✓	✓	✓	
p. Evaluation of Pollution Prevention opportunities?		X	X	X	
q. Control Authority inspector signature?		✓	✓	✓	

SECTION III: INDUSTRIAL USER FILE REVIEW

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

SECTION III: INDUSTRIAL USER FILE REVIEW

E. Enforcement

	N/A	Gates	Sim	Cobbs	N/A
1. Were all IU discharge violations identified in: [403.8(f)(2)(vii)]					
a. Control Authority monitoring results?		N/A	N/A	N/A	
b. IU self-monitoring results?		✓	✓	✓	
c. If NS CIU was it compliant within 90 days from commencement of discharge?		N/A	N/A	N/A	
2. How many reports submitted during the past reporting year indicated discharge violations?		*one*	*none*	*three*	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?		✓	N/A	✓	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?		✓	N/A	✓	
5. Were all nondischarge violations identified in the file?		N/A	N/A	N/A	
6. Was the IU notified of all violations?		N/A	N/A	N/A	
7. Was follow-up enforcement action taken by the Control Authority?		N/A	N/A	N/A	
8. Did the Control Authority follow its approved ERP?		✓	✓	✓	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?		N/A	N/A	N/A	
10. Is there a compliance schedule? If yes:		No	No	No	
11. Were there any compliance schedule violations?		N/A	N/A	N/A	

SECTION III: INDUSTRIAL USER FILE REVIEW

Enforcement (continued)

	N/A	Gates	Sim	Cobbs	N/A
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]		X[15]	X[15]	X[15]	
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations		N/A	N/A	N/A	
b. TRC		N/A	N/A	N/A	
c. Pass through/Interference		N/A	N/A	N/A	
d. Spill/slug loads		N/A	N/A	N/A	
e. Reporting		N/A	N/A	N/A	
f. Compliance schedule		N/A	N/A	N/A	
g. others (specify)		N/A	N/A	N/A	
13. Was the SIU published for SNC?		N/A	N/A	N/A	
Date of publication.		N/A	N/A	N/A	

Comments:

15. The three IUs had no late reports or continued violations; therefore, the City did not evaluate SNC.

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Siloam Springs NPDES AR0020273

Date of Audit: June 18 - 20, 2013 Date entered into QNCR: 06/24/2013

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

(INSERT ICIS WORKSHEET HERE)

Compliance Monitoring Information

Compliance Activity Type: *Inspection/Evaluation* Compliance Monitoring Type: *Audit*

Compliance Monitoring Activity Name: Siloam Springs Pretreatment Program

Tracking Permit No. AR0020273 Second Permit No. N/A Third Permit No. N/A

Compliance Monitoring Dates

Planned Start Date: 6/18/2013 Actual Start Date: 6/18/2013

Planned End Date: 6/20/2013 Actual End Date: 6/20/2013

Statutes and Sections Information

Programs: *NPDES – Pretreatment*

Compliance Monitoring Action Reasons: *Core Program*

Compliance Monitoring Agency Type: *State*

Compliance Monitoring Agency Name: *ADEQ*

Did EPA Assist? No

Was this a State or Joint Compliance Monitoring Activity? State

Government Contacts

Affliliation Type: State First Name: Rufus Last Name: Torrence

Phone: 501-682-0626 Office: NLR Organization: ADEQ

Codes

SIC Codes: 4952

NAICS Codes:

Compliance Monitoring Information

Number of Days Physically Conduction Activity: 3 Compliance Monitoring Action Outcome: Compliant

Compliance Monitoring Rating Code (SATISFACTORY, MARGINAL, UNSATISFACTORY, UNRATED): Satisfactory

Compliance Monitoring Comments

Siloam Springs POTW and its SIUs are located in the Illinois River Watershed with TMDLs for nutrients

Special Programs

Significant Industrial Users (SIUs)

SIUs: 3

SIUs Without Control Mechanism: 0

SIUs Not Inspected: 0

SIUs Not Sampled: 0

SIUs in SNC with Pretreatment Standards: 0

SIUs in SNC with Reporting Requirements: 0

SIUs in SNC with Pretreatment Schedule: 0

SIUs in SNC Published in Newspaper: 0

SIUs Schedules: 0

Violation Notices Issued to SIUs: 4

Administrative Orders Issued to SIUs: 0

Civil Suits Filed Against SIUs: 0

Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

CIUs: 1

CIUs in SNC: 0

Penalties

Dollar Amount of Penalties Collected 0

Industrial Users (IUs) from which Penalties have been collected 0

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: *City of Siloam Springs* NPDES #: *AR0020273*

Name, address and phone number of industry:
Simmons Foods 530 E. Main (479)524-8151

Type of industry: *Poultry* Date/Time of visit: *6/19/2010 @ 2:00 pm*

Industry contacts: *Joe Earney, Director of Env Quality*
Tim Singleton, Oprs Mgr & Perry Brown, Maint Mgr.

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

Noted comments:

1. **Simmons has two DAF units which usually runs in parallel to handle the "normal" flow. The "kill plant" has been relocated and the pet food plant is down for updates; therefore, the flow is reduced and Simmons is currently using only one DAF unit (alternating treatment between the two units).**
2. **The City is sampling at a manhole near custody transfer. Simmons is sampling at a point next to the truck wash shed. Simmons should sample at the manhole, too.**

Visit conducted by: *Rufus Torrence* Date: *6-27-2013*

Rufus Torrence
(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: *City of Siloam Springs* NPDES #: *AR0020273*
Industry name: *Simmons Foods*
Additional comments:

No chickens are presently killed on-site. The breast sections of the chickens are received from other sites to be deboned.

The "debone" facility is "sizing" plant where the bones are removed the main breast section is cut into desired shapes for nuggets, strips and grilling patties. Wastewater is generated by washing chicken parts, equipment, floors and flows to the pretreatment system.

Truck maintenance and wash sheds are on-site; wastewater from the truck wash is periodically sampled, is released directly to the POTW and bypasses the pretreatment system.

Visit conducted by: *Rufus Torrence* Date: 6-27-2013

Rufus Torrence
(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: *City of Siloam Springs* NPDES #: *AR0020273*

Name, address and phone number of industry:
Gates Rubber; 1801 N. Lincoln; (479) 524-8164

Type of industry: *Rubber Belts 40 CFR 428*
regulatory citation if CIU)

Date/Time of visit: *6/19/2013 @ 10:50 am*

Industry contacts: *James Chipman, Facility Engineering*

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

Noted comments:

1. Gates has oil skimmer only.

Visit conducted by: *Rufus Torrence* Date: *6-27-2013*

Rufus Torrence
(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: *City of Siloam Springs* NPDES #: *AR0020273*

Industry name: *Gates Rubber*

Additional comments:

Gates makes rubber belts for automotive use. Gates purchases both natural and synthetic rubber.

The rubber is layered over a fabric mesh for strength and cut to a specified width. The only source of process wastewater is cooling water; most of the cooling water is non-contact cooling water.

Visit conducted by: Rufus Torrence Date: 6-27-2013

Rufus Torrence

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: *City of Siloam Springs* NPDES #: *AR0020273*

Name, address and phone number of industry:
Simmons Foods 530 E. Main (479)524-8151

Type of industry: *Poultry* Date/Time of visit: *6/19/2010 @ 2:00 pm*

Industry contacts: *Joe Earney, Director of Env Quality*
Tim Singleton, Oprs Mgr & Perry Brown, Maint Mgr.

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

Noted comments:

1. **Simmons has two DAF units which usually runs in parallel to handle the "normal" flow. The "kill plant" has been relocated and the pet food plant is down for updates; therefore, the flow is reduced and Simmons is currently using only one DAF unit (alternating treatment between the two units).**
2. **The City is sampling at a manhole near custody transfer. Simmons is sampling at a point next to the truck wash shed. Simmons should sample at the manhole, too.**

Visit conducted by: *Rufus Torrence* Date: 6-27-2013

Rufus Torrence
(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: *City of Siloam Springs* NPDES #: *AR0020273*
Industry name: *Cobb-Vantress*

Additional comments:

Eggs are delivered to the hatchery from layer farms owned primarily by Cobb (a wholly owned subsidiary of Tyson). The temperature of the incubators is controlled at 98.6 degrees Fahrenheit. The eggs stay in the incubators from 18 to 21 days before the chicks are hatched. The chicks are administered antibiotics and sexed immediately after hatching. The females are sent to farms to serve as layers; the males are sent to broiler farms to be raise for food purposes. When the females reach the end of their productive egg laying life, they are either incinerated or sold for pet food.

Only a small quantity of floor wash wastewater comes from the hatching area; the crew uses a non-phosphate soap.

The pH of the wastewater can vary because most of Cobb's wastewater is generated at the truck wash building; trucks are washed with either hydrochloric, sulfuric or hydrofluoric acids. The trucks are rinsed with an alkaline solution and fresh city water.

Cobb personnel try to balance the amount of acid wash with alkaline rinse to hold the pH of the wastewater as close as possible to 7 before discharging the wastewater to the POTW.

Visit conducted by: Rufus Torrence Date: 6-27-2013

Rufus Torrence
(signature of auditor conducting visit)

CITY OF SILOAM SPRINGS
PO BOX 80
SILOAM SPRINGS, AR 72761
(479) 524-5136

APPLICATION FOR INDUSTRIAL SEWER CONNECTION PERMIT

TO: City of Siloam Springs
Attn: Director Water/Wastewater Utilities
PO Box 80
Siloam Springs, AR 72761 – 0080

Pursuant to Ordinance No. 00-11, dated April 30, 2011, of the City of Siloam Springs, application is herewith submitted to (establish) (continue) Continue an industrial sewer connection for the following industry.

Name of Industry: Simmons Prepared Foods, Inc.
Address: P.O. Box 430
Type of Industry: Poultry Processing, Further Processing & Pet Food production.

In support of this application, information required by Section 4.2.2 (a) through (m) of Ordinance No. 00-11 is attached hereto:

In consideration of the granting of this permit the undersigned agrees to:

1) To furnish any additional information relating to the installation or use of the industrial sewer for which this permit is sought as may be requested by the City.

2) To accept and abide by all provisions of Ordinance No. 00-11 of the City of Siloam Springs and of all other pertinent Ordinances or regulations currently in effect or that may be adopted in the future.

3) To operate and maintain any waste pretreatment facilities, as may be required as a condition of the acceptance into the wastewater treatment system of the industrial wastes involved, in an efficient manner at all times, and at no expense to the City.

4) To cooperate at all times with the City and his representative in their inspecting, sampling, and study of the industrial wastes, and any facilities provided for pretreatment.

5) To notify the City immediately in the event of any accident, or other occurrence that occasions contributor to the wastewater treatment system of any wastewater of substances prohibited or not covered by this permit.

DATE: April 18, 2011 SIGNED: T. R. Carney

Inspection fee attached: _____ TITLE: Director of Environmental Quality

Application approved and permit granted

April 20, 2011 _____
Date Signed

A-1/15

March 7, 2013

P.O. BOX 430
SILOAM SPRINGS, ARKANSAS 72761
TELEPHONE: 479/524-8151
FAX: 479/215-2772

Tom Myers
City of Siloam Springs
P.O. Box 80
Siloam Springs, Ark. 72761

RE: Submittal of the 2012 Pre-Treatment Questionnaire.

Dear Mr. Myers:

Enclosed is the completed Pre-Treatment Questionnaire and the revised SPCC plan.

- **PLEASE NOTE THAT THE SIMMONS WET PET FOOD OPERATION WILL SHUT DOWN PRODUCTION APPROXIMATELY MARCH 22 AND NEW CONSTRUCTION WILL BEGIN TO INSTALL AN INITIAL 14 OVENS, WITH PLANS TO BE IN OPERATION AROUND SEPTEMBER 1, 2013.**

Should you need any additional information, please contact me at 479-415-2415 or joe.earney@simfoods.com.

Sincerely,

Joe R. Earney
Director of Environmental Quality

cc: John Morris
Wes McClure
Gary Murphy

Presidential Award For Excellence

A - 2/15

INDUSTRIAL WASTE DISCHARGE QUESTIONNAIRE
SILOAM SPRINGS, ARKANSAS

I. COMPANY INFORMATION

Company Name SIMMONS FURTHER PROCESSING (PLANT TWO), PET FOOD, AND TRUCK SHOP.

Mailing Address P.O. BOX 430
Street Address: 601 NORTH HICO
SILOAM SPRINGS, ARKANSAS 72761

Authorized Official GARY MURPHY
Title PRESIDENT/C.O.O POULTRY GROUP
Address 601 NORTH HICO
SILOAM SPRINGS, ARKANSAS 72761
Telephone Number OFFICE 479-524-8151

Contact Representative: JOE R. EARNEY
Title DIRECTOR OF ENVIRONMENTAL QUALITY
Address 601 NORTH HICO
SILOAM SPRINGS, ARKANSAS 72761
Telephone Number: OFFICE 479-215-2415 OR CELL 479-427-0485

Note to Signing Official: In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.14, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR Part 2. Should a discharge permit be required for your facility, the information in this questionnaire will be used to issue the permit.

I have examined and am familiar with the information submitted in this document and attachments. To the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and/or imprisonment.

3-18-13
Date

Signature of Authorized Representative

A-3/15

II. GENERAL INFORMATION

Type of Business SIMMONS FURTHER PROCESSING (PLANT 2), PET FOOD PROCESSING AND CANNING, AND TRUCK SHOP MAINTENANCE AND TRUCK WASH – NOTE: SEE ATTACHED SHEET FOR PROCESS/PRODUCTION PROCESSES—

- **DO ALSO NOTE** THAT THE PLANT ONE PROCESSING PLANT (SLAUGHTER OPERATION) WAS SHUT DOWN ON AUGUST 19, 2011.
- **DO ALSO NOTE** THAT THE PET FOOD WET PROCESSING IS ALSO SCHEDULED TO SHUT DOWN THE WET/PET PRODUCTION SOMETIME DURING THIS MONTH OF MARCH 2013 WITH CONSTRUCTION TO THEN BEGIN ON THE CONVERSION AND INSTALLATION OF AN INITIAL NEW 14 OVENS WITH THIS NEW PROCESS TO BE OPERATIONAL SOMETIME DURING THE MONTH OF SEPTEMBER 2013.

Production Description (attach additional sheet if necessary)
1) PET FOOD PRODUCTION FOR CANNED PET FOOD FOR DOGS AND CATS –SIC CODE 2047 AND NAICS 311111

2) TRUCK MAINTENANCE SHOP AND TRUCK WASH –SIC CODE 4212 AND NAICS CODE 811198 – SIMMONS OWNED/MANAGED SHOP WHERE FLEET TRACTORS ARE FUELED, & REPAIRED AS NEEDED, AND TRACTORS AND TRAILERS ARE WASHED USING A COMPANY MANDATED PHOSPHATE FREE SOAP AS NEEDED-WITH OPERATION TYPICALLY 5 DAYS/WEEK OR AS NEEDED.

III. OPERATIONAL CHARACTERISTICS

- *NOTE: PLEASE SEE ATTACHED SHEET FOR SHIFTS, HOURS, EMPLOYEE NUMBERS ETC. FOR THE PET FOOD, PLANT TWO AND TRUCK SHOP OPERATIONS.

Production Shifts
Hours of Operation ___ to ___ or ☒ Continuous
Number of shifts per day

Employees per shift 1st___ 2nd___ 3rd___ Time
shift begins 1st___ 2nd___ 3rd___ Time shift
ends 1st___ 2nd___ 3rd___ Work days
1st___ 2nd___ 3rd

Raw materials and process additives used * NOTE: PLEASE SEE ATTACHED SHEET

A-4/15

Type of production processes:

☐ Batch
☒ Continuous
☐ Both ___ % Batch ___ % Continuous
___ Average number of batches per day

Are there scheduled facility shutdowns? ☐ Yes ☒ No
If so, when? _____

Seasonal Production:

Is production subject to seasonal variations? ☐ Yes ☒ No
If yes, briefly describe seasonal production cycle _____

IV. WATER CONSUMPTION AND LOSSES

Is there any wastewater generated within your facility other than normal domestic sewage?

☒ Yes ☐ No

- **NOTE: PLEASE SEE ATTACHED PRE-TREATMENT PROCESS FROW DIAGRAM ..NOTE ALSO THAT PLANT DIAGRAM (SITE PLAN) HAS BEEN PREVIOUSLY SUBMITTED.** Provide a diagram or blueprint of the facility sewer drain system showing process sources, floor drains, grease traps, settling basins, screens, other applicable treatment components, pretreatment systems, connections to the City sewer system, and access manholes.\

***NOTE**: THIS IS ALREADY ON FILE WITH TOM MYERS, BUT IF ANOTHER COPY IS NEEDED PLEASE ADVISE AND WE WILL PROVIDE.

Water Consumption (estimates):

☒	(a)	Sanitary	~18,000 Avg Gal/Day
☒	(b)	Cooling Water, non contact	~5,000 Avg Gal/Day
☒	(c)	Cooling Water, contact	~20,000 Avg Gal/Day
☒	(d)	Boiler/Tower Blowdown	~3,000 Avg Gal/Day
☒	(e)	Production Processes	~650,000 Avg Gal/Day
☒	(f)	Contained in Product	~20,000 Avg Gal/Day
☒	(g)	Other (describe) ICE_____	~10,000 Avg Gal/Day
		_____	___ Avg Gal/Day
	(h)	Total	

A - 5/15

V. PRETREATMENT INFORMATION

Wastes:

Are any liquid wastes or sludges from this facility disposed of by means other than discharge to the sewer system? ☒ Yes ☐ No

If yes, these wastes may best be described as:

☐	Acids and Alkalies	___ Gal or lbs/Yr
☐	Heavy Metal Sludges	___ Gal or lbs/Yr
☐	Inks/Dyes	___ Gal or lbs/Yr
☐	Oil and/or Grease	___ Gal or lbs/Yr
☐	Organic Compounds	___ Gal or lbs/Yr
☐	Paints	___ Gal or lbs/Yr
☐	Pesticides	___ Gal or lbs/Yr
☐	Plating Wastes	___ Gal or lbs/Yr
☐	Pretreatment Sludges	___ Gal or lbs/Yr
☐	Solvents/Thinners	___ Gal or lbs/Yr
☐	Other Hazardous Wastes (specify)	___ Gal or lbs/Yr
	_____	___ Gal or lbs/Yr
	_____	___ Gal or lbs/Yr
☒	Other Wastes (specify) (DAF SKIMMINGS AT 5 LOADS/WEEK)	~1,560,000 Gal/Yr
	_____	___ Gal or lbs/Yr

For the above checked wastes, does your facility practice:

☒ On-site storage (TEMPORARY)
☐ Off-site storage
☐ On-site disposal
☒ Off-site disposal –*NOTE DONE BY ADEQ PERMITTED WASTE HAULER.

Briefly describe the method(s) of storage or disposal checked above:

WASTE SOLIDS FROM TWO (2) HABERSHAM 600 GPM (EACH) DAF UNITS ARE COLLECTED AND PUMPED TO ON-SITE TEMPORARY STORAGE TANKS. THEN AN OUTSIDE STATE PERMITTED CONTRACTOR HAULER (TRS) TAKES THIS SKIMMINGS MATERIAL TO A TRS/ADEQ PERMITTED APPLICATION FIELD ALONG THE ARKANSAS RIVER AREA AND SUB-SURFACE INJECTS THIS MATERIAL AS A SOIL AMENDMENT AND FERTILIZER. WE CURRENTLY HAVE 22,300 GALLONS OF ON-SITE TEMPORARY STORAGE CAPACITY WITH THESE FOUR (4) TANKS (SEE ATTACHED PROCESS FLOW DIAGRAM)

A - 6/15

If any wastewater analyses have been performed on your facility's discharge, attach a copy of the most recent data to this questionnaire. Include date of the analysis, name of laboratory performing the analysis, and location(s) from which sample(s) were taken.

WE, SIMMONS FOODS UTILIZE THE LAB SERVICES OF ENVIRONMENTAL SERVICES COMPANY, INC. , NORTHWEST ARKANSAS BRANCH AT SPRINGDALE, ARKANSAS – 1107 CENTURY AVENUE—LYNN PATE IS THE LAB MANAGER AND PHONE NUMBER IS 479-750-1170.

*NOTE: ATTACHED ARE THE LATEST MONTHLY RESULTS FOR MONTH OF FEBRUARY 2013 FROM OUR CONTRACT LAB.

Water Losses:

☐	(a)	Sanitary Sewer	___	Avg Gal/Day
☐	(b)	Storm Sewer	___	Avg Gal/Day
☐	(c)	Surface Water	___	Avg Gal/Day
☐	(d)	Waste Hauler	___	Avg Gal/Day
☐	(e)	Evaporation	___	Avg Gal/Day
☐	(f)	Other (describe) _____	___	Avg Gal/Day
		_____	___	Avg Gal/Day
	(g)	Total		

Name and Address of Waste Hauler, if used:

TERRA RENEWAL SERVICES (TRS)
611 UNION STREET – P.O. BOX 150
DARDANELLE, ARKANSAS 479-229-3656

List each source of wastewater describing the process which produces the wastewater and the general type of pollutant in the wastewater stream (i.e .: detergent, grease, wood shavings, caustic cleaning agent, food particles, etc.):

1) PET FOOD – PET FOOD PRODUCTION AND CANNING – BOD, TSS, TKN. FROM SMALL MEAT PARTICLES AND PREMIX FROM FEEDMILL

2) PLANT TWO – FURTHER PROCESSING AND CUT UP FROM PROCESSED CHICKENS FROM THE SIMMONS FACILITIES AT SOUTHWEST CITY, MO. AND DECATUR, ARKANSAS. – BOD, TSS OILS AND GREASE, TKN, AND PHOSPHORUS FROM BOTH ABOVE LISTED PLANTS.

3) TRUCK SHOP – BOD, TSS, OILS AND GREASE, PHOSPHORUS

A-7/15

Type of Discharge:

Is discharge to Sanitary Sewer? ☐ Intermittent ☒ Steady
If intermittent, describe (holding tanks, sump pump, batch discharge, etc.):

Are any process changes or expansions planned during the next three years?

☒ Yes ☐ No

If yes, attach a separate sheet to this form describing the nature of planned changes or expansions.

- **NOTE: AS NOTED ABOVE ALSO:** THE PET FOOD WET PROCESSING IS ALSO SCHEDULED TO SHUT DOWN THE WET/PET FOOD PRODUCTION SOMETIME DURING THIS MONTH OF MARCH 2013 WITH CONSTRUCTION TO THEN BEGIN ON THE CONVERSION AND INSTALLATION OF AN INITIAL 14 OVENS WITH THIS NEW PROCESS TO BE OPERATIONAL SOMETIME DURING THE MONTH OF SEPTEMBER 2013.

Is an Accidental Spill Prevention Plan prepared for the facility:

☒ Yes ☐ No

If yes, attach a copy of the Spill Prevention Plan

Is a Slug Discharge Control Plan prepared for the facility: ☐ Yes ☒ No

If yes, attach a copy of the Slug Discharge Control Plan.How are spills (chemicals, food wastes, etc.) disposed of?

☐ Washed into sewer
☐ Hauled off premises
☒ Other (describe) **NOTE:** ALL INCIDENTAL SPILLS SHOULD THEY OCCUR WOULD BE FIRST CONTAINED, THEN CAPTURED AND DISPOSED OF AS PER GUIDELINES IN RESPECT TO THE TYPE OF SPILL....AND SHOULD THERE BE ANY SPILLS OF ANY CONSEQUENCE, THEY ARE OR WOULD BE IMMEDIATELY CALLED IN AND REPORTED TO TOM MYERS WITH THE CITY OF SILOAM SPRINGS FOR OUR COORDINATED EFFORTS.

A-8/15

2013 - SIMMONS FOODS - SILOAM OPERATIONS:

A. **Simmons Wet Pet Food: Operations Manager - John Morris**
Pet Food - Siloam Springs, Ark. Use of fresh offal, feed grain pre-mix with addition of any needed minerals and vitamins. Product is canned, labeled, and packaged for many customers/suppliers going to the Pet Food markets. This facility typically operates 5 to 6 days/week or as needed.

- Plant employees: Approx. 238

Production is 7 days/week schedules . We have 4 production shifts and operate 24 hours a day until closing.
Raw Materials and process additives used: poultry parts, grain premix; cleaning chemicals ie. sodium hypochlorite.

B. **Plant #2, Siloam Springs, Ark. – Operations Manager –Tim Singleton.** This is a further processing facility with de-boning and individually frozen (I.F.) processes. This plant receives its raw material from both the Simmon's Decatur plant in Decatur, Arkansas and the Southwest City, Missouri Plant.

C. This Plant Two facility typically operates 6 days/week, but can vary as needed.

- Plant Employees: Approx. 663

First shift is 12 hours from 5 am to 5 pm
Second shift is also 12 hours from 5:00 pm till 5am
Sanitation is Friday 12:00 am till 12:00 pm Saturday,
working around scheduled production.

Raw Materials and process additives used: Dressed poultry from other Simmons plants, cleaning chemicals..ie. sodium hypochlorite.

D. **Truck Shop/Wash: Director of Fleet Operations – Dick Bolen**

- Employees: approx. 7 shop employees, with another 8 in office area (total 15)...with shop hours typically from 7am till midnight, and half day Saturday.

This is a Simmons owned, managed truck maintenance, fuel station with truck wash bay, where fleet tractors are fueled, repaired, and washed as needed; with tractors/trailers being washed using phosphate free soap as needed. Operation is typically 5 days/week and half a day on Saturday.

Raw Materials and process additives used: lubricants, oils for service work, along with cleaning materials/soap for truck wash bay inclusive of phosphate free soap.

CHEMICAL LIST:

PRE -TREATMENT/WASTEWATER:

1. Anionic polymer – try to keep close to one pallet on-site -50 lbs/bag and 30/pallet.
2. Cationic polymer - try to keep close to one pallet on-site -50 lbs/bag and 30/pallet.
3. 318 Coagulant – (Not using at present) but have two totes onsite at approx. 300 gallons each.
4. Ferric sulfate –have 6,000 gallon storage tank…but typically only have 4,000 gal or less on site at any one time.

Processing Plant:

- Has been shut down since August 19, 2011

PET FOOD:

- KC-262 Ployfoam – soap
- KC-612 – Sodium hypochlorite
- KC-404 M - Acid
- KC-553 OW - Caustic
- Kc -564 High Caustic cleaner and degreaser
- KC -634 –Sanitizer and disinfectant.

NOTE: All except sanitizer are in 275 gallon totes

TRUCK SHOP/WASH BAY

- Soap (phosphate free) 1,000 gallons
- Acid solution (hydrochloric/sulfuric) 1,000 gallons

PLANT TWO (FURTHER PROCESSING):
SANITATION CHEMICALS: all in 55 gallon drums

- **Quadexx 100**
- **Quadexx 200**
- **Quadexx 400**
- **Quadexx 501**
- **Quadexx 800**
- **Soil off**
- **Envirocid**

A-16/15

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

ntrol Number: 1302020051
stomer Name : SIMMONS FOODS-PLANT #1
stomer/Permit No. : 770 / 001 001
port Date : 02/21/13

Composite Date: 02/04/13 -02/05/13
Sample Time : 1000-1000/0955
Sample Type : 24HR COMP/GRAB
Sample From : EFFLUENT OUTFALL 001

Collected By: KLK
Delivery By : SJR
Work Order :
Purchase Order :

Laboratory Analysis

Analysis Date	Time	By	Parameter	Result	Notes	Quantity	Method	Quality Assurance Precision % RPD	Quality Assurance Accuracy % Recovery
/06	1500	MNM	BOD, 5-day	256.0 mg/L		1346.82 #/day	SM 18th 5210B	1.32	103.0 *
/19	1100	TSB	Oil & Grease, Total	8.2 mg/L		43.14 #/day	EPA 1664A	18.31	83.0 *
/05	0955	KIK	pH	6.0 S.U.			SM 18th 4500-H+ B	0.00	N/A *
/15	0900	MNM	Phosphorous, Total (as P)	3.5 mg/L		18.41 #/day	EPA 365.3	11.24	110.0 *
/08	1630	SJI	Solids, Total Suspended	126.0 mg/L		662.89 #/day	SM 18th 2540D	9.52	N/A *
/06	1500	MNM	Soluble BOD	152.0 mg/L		799.67 #/day	SM 18th 5210B	0.66	103.0

Flow 0.631320 MGD

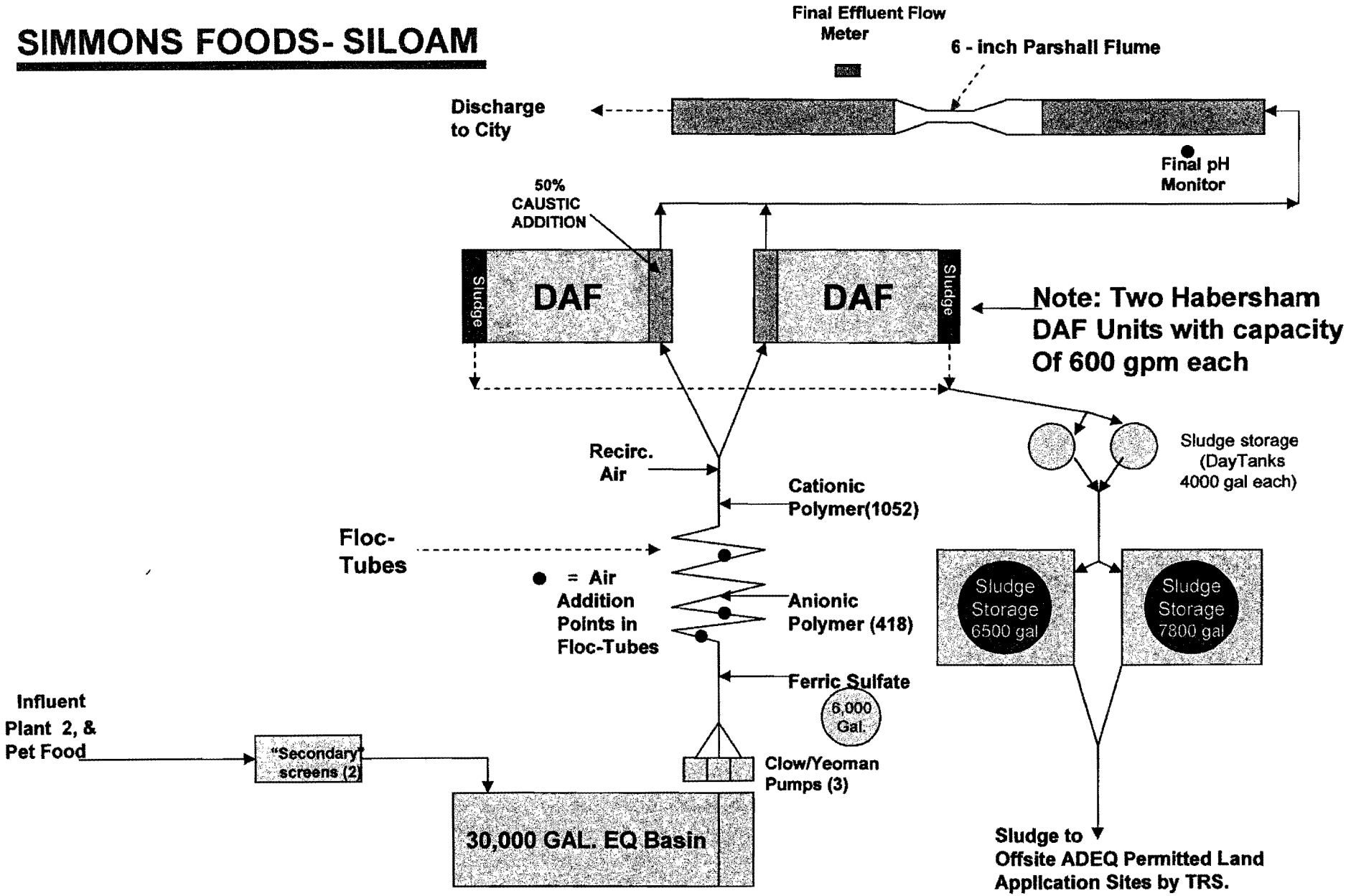
4-11/15

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

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 _____
Environmental Services Co., Inc.

SIMMONS FOODS- SILOAM



A-12/15

JRE 3/14/2011

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

Environmental Services Company, Inc.
Northwest Branch
1107 Century
Springdale, AR 72764
Phone 479-750-1170 Fax::479-750-1172

CHAIN OF CUSTODY

Client Information		Project Information	
Company Name:	Simmons Plant 1	Permit/Project #:	Outfall 001
Address:	PO BOX 430	Purchase Order #:	
	Siloam Springs, AR 72761		
Telephone:	(479) 524-8151	Sampler Name(s):	Kyle Knieveus
FAX:	(479) 524-3961	and Signature(s):	
ESC Client Number:	770		

Sample Identification		Sample Collection				Sample Containers				Requested Parameters							
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	pH	Oil & Grease	BOD,TSS,SBOD	Phos				
Effluent	1302020051	2/5/13	0955	Grab	Water	Teflon	150ml	none	1	X							
Effluent	〃	〃	〃	Grab	Water	glass	1 Qt	H_2SO_4,pH <2	1		X						
Effluent	〃	2/4/13 2/5/13	1000-1000	Fpc	Water	Plastic	1 Qt	none/ice	1			X					
Effluent	〃	〃	〃	Fpc	Water	Plastic	8 oz	H2SO4,pH <2	1				X				

4-15-15

Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time
DSJC Kyle Knieveus	2/5/13	1145			
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 for Lab By: (Signature and Printed Name)	Date	Time
			Shirley Rather Shirley Rather	2/5/13	1145

Custody Seals: Used? N Intact? ☐
Turnaround: Regular X Special ☐
Were samples properly preserved: Yes X No ☐

Comments:	FLOW DATA		Field Test	Time	Analyst	Result	Result	Units
	Analyst:	KSK	pH:	0955	KSK	6.02		
Composite sample temp: 2.6	Time:	0955	Temp.:					°C °F
	Reading:	631320	DO:					
	Units:	MGD	Debris:					
Cool all samples to 6 degrees C.			Chlorinated? Yes No			This Document is Page __ of __		

Environmental Services Company, Inc.
Corporate Office
13715 West Markham
Little Rock, AR 72211
P.O. Box 55146
Little Rock, AR 72215
website: **www.esclabs.com**
Phone: 501-221-2565 Fax: 501-221-1341

Environmental Services Company, Inc.
Northwest Branch
1107 Century
Springdale, AR 72764
Phone 479-750-1170 Fax:479-750-1172

CHAIN OF CUSTODY

Client Information		Project Information	
Company Name:	Simmons-Truck Wash	Permit/Project #:	Outfall-002
Address:	PO Box 430	Purchase Order #:	
	Siloam Springs		
Telephone:	(479) 524-8151	Sampler Name(s):	
FAX:	(479) 524-3961	and Signature(s):	
ESC Client Number:	1238		

Sample Identification		Sample Collection				Sample Containers				Requested Parameters							
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	pH	Oil & Grease	BOD,TSS	Phosphorous				
Effluent	1302070052	2/6/13	0940	Grab	Water	teflon	150ml	none	1	X							
Effluent		2/4/13	10:00PM	Grab	Water	glass	1 qt	H_2SO_4,pH <2	1		X						
Effluent		2/4/13	4:00PM 10:00PM	6 Hr. Comp	Water	plastic	1 qt	none/ice	1			X					
Effluent		2/4/13	4:00PM 10:00PM	6 Hr. Comp	Water	plastic	8 0z	H_2SO_4,pH <2	1				X				

Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time	Custody Seals: Used? [ ] Intact? [ ]
	2/5	9:50		2/6/13	0950	
Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time	Turnaround: Regular [X] Special [ ]
	2/5/13	1145				
Relinquished By: (Signature and Printed Name)	Date	Time	Received for Lab By: (Signature and Printed Name)	Date	Time	Were samples properly preserved: Yes [X] No [ ]
				2/5/13	1145	

Comments:	FLOW DATA	Field Test	Time	Analyst	Result	Result	Units
	Analyst:	pH:	0940	KSK	6.81	6.79	
	Time:	Temp.:	0940	KSK		22	°C · °F
	Reading:	DO:					
	Units:	Debris:					
Cool all samples to 6 degrees C.		Chlorinated? Yes No			This Document is Page __ of __		

A-14/15

KSK

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: 1302020052
Customer Name : SIMMONS FOODS-TRUCK WASH
Customer Number : 1238
Report Date : 02/21/13

Composite Date:02/04/13 -02/04/13
Sample Time : 1600-2200/0940
Sample Type : 6HR COMP/GRAB
Sample From : EFFLUENT OUTFALL 002

Collected By: MA
Delivery By : SJR
Work Order :
Purchase Order :

Laboratory Analysis

Analysis Date	Time	By	Parameter	Result	Notes	Quantity	Method	Quality Assurance Precision % RPD	Quality Assurance Accuracy % Recover
02/06	1500	MNM	BOD, 5-day	239.0 mg/L			SM 18th 5210B	4.15	103.0
02/19	1100	TSB	Oil & Grease, Total	38.4 mg/L			EPA 1664A	18.31	83.0
02/05	0940	KIK	pH	6.8 S.U.			SM 18th 4500-H+ B	0.00	N/A
02/11	0800	MNM	Phosphorous, Total (as P)	9.6 mg/L			EPA 365.3	1.50	100.9
02/08	1630	SJI	Solids, Total Suspended	516.0 mg/L			SM 18th 2540D	9.52	N/A

A-15/15

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

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 _____
Environmental Services Co., Inc.

CITY OF SILOAM SPRINGS
PO BOX 80
SILOAM SPRINGS, AR 72761
(479) 524-5136

APPLICATION FOR INDUSTRIAL SEWER CONNECTION PERMIT

TO: City of Siloam Springs
Attn: Director Water/Wastewater Utilities
PO Box 80
Siloam Springs, AR 72761 – 0080

Pursuant to Ordinance No. _____, dated _____, of the City of Siloam Springs, application is herewith submitted to (establish) (continue) _____ an industrial sewer connection for the following industry.

Name of Industry: Cobb-Vantress, Inc.
Address: Intersection of Arkansas 59 and US Highway 412 East
Type of Industry: Poultry Hatchery and Wash Bay

In support of this application, information required by Section 4.2.2 (a) through (m) of Ordinance No. _____ is attached hereto:

In consideration of the granting of this permit the undersigned agrees to:

1) To furnish any additional information relating to the installation or use of the industrial sewer for which this permit is sought as may be requested by the City.

2) To accept and abide by all provisions of Ordinance No. _____ of the City of Siloam Springs and of all other pertinent Ordinances or regulations currently in effect or that may be adopted in the future.

3) To operate and maintain any waste pretreatment facilities, as may be required as a condition of the acceptance into the wastewater treatment system of the industrial wastes involved, in an efficient manner at all times, and at no expense to the City.

4) To cooperate at all times with the City and his representative in their inspecting, sampling, and study of the industrial wastes, and any facilities provided for pretreatment.

5) To notify the City immediately in the event of any accident, or other occurrence that occasions contributor to the wastewater treatment system of any wastewater of substances prohibited or not covered by this permit.

DATE: 4-14-2011 SIGNED: Chris Sheron

Inspection fee attached: _____ TITLE: Sr. Manager Area Environment

Application approved and permit granted

_____ _____
Date Signed

A2-1/1

CITY OF SILOAM SPRINGS
PO BOX 80
SILOAM SPRINGS, AR 72761
(479) 524-5136

APPLICATION FOR INDUSTRIAL SEWER CONNECTION PERMIT

TO: City of Siloam Springs
Attn: Director Water/Wastewater Utilities
PO Box 80
Siloam Springs, AR 72761 – 0080

Pursuant to Ordinance No. 00-11, dated April 13, 2011, of the City of Siloam Springs, application is herewith submitted to (establish) (continue) Continue an industrial sewer connection for the following industry.

Name of Industry: Gates Corporation
Address: 1801 N Lincoln Siloam Springs AR 72761
Type of Industry: Rubber Belt Manufacturing

In support of this application, information required by Section 4.2.2 (a) through (m) of Ordinance No. 00-11 is attached hereto:

In consideration of the granting of this permit the undersigned agrees to:

1) To furnish any additional information relating to the installation or use of the industrial sewer for which this permit is sought as may be requested by the City.

2) To accept and abide by all provisions of Ordinance No. 00-11 of the City of Siloam Springs and of all other pertinent Ordinances or regulations currently in effect or that may be adopted in the future.

3) To operate and maintain any waste pretreatment facilities, as may be required as a condition of the acceptance into the wastewater treatment system of the industrial wastes involved, in an efficient manner at all times, and at no expense to the City.

4) To cooperate at all times with the City and his representative in their inspecting, sampling, and study of the industrial wastes, and any facilities provided for pretreatment.

5) To notify the City immediately in the event of any accident, or other occurrence that occasions contributor to the wastewater treatment system of any wastewater of substances prohibited or not covered by this permit.

DATE: 04/13/11 SIGNED: Courtenay Sawyer

Inspection fee attached: _____ TITLE: EHSE

Application approved and permit granted

_____ _____
Date Signed

A3- 1/1

CITY OF SILOAM SPRINGS

PO BOX 80

SILOAM SPRINGS, ARKANSAS 72761-0080

WASTEWATER DISCHARGE PERMIT

Company Name Simmons Industries

Division (if applicable) _____

Mailing Address P.O. Box 430

Siloam Springs, Arkansas 72761

Facility Address North Hico Street

Siloam Springs, Arkansas 72761

Permit Number 001

Pursuant to all terms and conditions of Ordinance No. 00-11, City of Siloam Springs, Arkansas, and subject to any applicable provision of Federal or State Law or regulation; permission is hereby granted to Simmons Industries, classified by SIC No. 20 & 2047 for the contribution of industrial wastewater into the City of Siloam Springs sewer lines at the plant site at North Hico Street. This permit is granted in accordance with the application filed on April 30, 2011 and in conformity with all data submitted in support of the application, all of which are filed with and considered as part of this permit.

This permit is granted subject to conditions, requirements, or limitations attached hereto. Further, this permit is subject to modification, upon review, should the volume, flow, character or content of the industrial wastewater materially change.

Effective Date: May 31, 2011

Expiration Date: May 31, 2016

City Administrator David Cameron

City Administrator Signature: _____ Date: 5/31/11

B-1/30

SPECIFIC CONDITIONS

SECTION A - DISCHARGE LIMITATIONS

SIMMONS INDUSTRIES PLANT #1:

Pollutant	Daily Maximum (mg/l)	Maximum Monthly Average (mg/l)
Oil and Grease	100 mg/l	100 mg/l
PH	Between 5.8 - 9.0 or 5.5 – 9.0 with continued monitoring	Between 5.8 - 9.0 or 5.5 – 9.0 with continued monitoring
Total Suspended Solids	900 mg/l	350 mg/l
BOD	900 mg/l	350 mg/l
Maximum Discharge	2,000,000 MGD	2,000,000 MGD
Phosphorus (T)	Report only mg/l	Report only mg/l
Ammonia (NH_3-N)	Report only mg/l	Report only mg/l
Nitrate (NO_3)	Report only mg/l	Report only mg/l
Cyanide	Report only mg/l	Report only mg/l
Zinc	Report only mg/l	Report only mg/l
Copper	Report only mg/l	Report only mg/l

SIMMONS INDUSTRIES TRUCK SHOP:

Pollutant	Daily Maximum (mg/l)	Maximum Monthly Average (mg/l)
Oil and Grease	Report only mg/l	Report only mg/l
PH	Between 5.8 – 10.0	Between 5.8 – 10.0
Total Suspended Solids	Report only mg/l	Report only mg/l
BOD	Report only mg/l	Report only mg/l
Maximum Discharge	Report only mg/l	Report only mg/l

Pollutant	Daily Maximum (mg/l)	Maximum Monthly Average (mg/l)
Phosphorus (T)	Report only mg/l	Report only mg/l
Ammonia (NH_3-N)	Report only mg/l	Report only mg/l
Nitrate (NO_3)	Report only mg/l	Report only mg/l
Cyanide	Report only mg/l	Report only mg/l
Zinc	Report only mg/l	Report only mg/l
Copper	Report only mg/l	Report only mg/l

The discharge limits stated in this permit are the more stringent between the City Ordinance 00-11 (Section 2.4) limits and the Code of Federal Regulations (40 CFR part 403.1 – General Provisions Point Source) limits for the conventional pollutants (Total Suspended Solids, BOD, pH and Oil and Grease). These limits are to be applied to the regulated process waste streams prior to any dilution from non-regulated or dilution waste streams. If the point at which samples are collected from this facility is subsequent to any dilution by non-regulated or dilution waste systems , then it shall be the permittee's responsibility to furnish to the City all information necessary to calculate combined waste stream limits.

SECTION B - SELF-MONITORING REQUIREMENTS

Sample Monitoring Requirements

Pollutant	Location	Frequency	Sample Type
Flow*	(1)	Daily	Record on Log (Daily)
TSS	(1)	Monthly	24 hr. flow proportioned
Oil & Grease	(1)	Monthly	Preserved Grab
PH	(1)	Monthly	Grab
BOD	(1)	Monthly	24 hr. flow proportioned
Copper (T)	(1)	Quarterly	24 hr flow proportioned

Cyanide (T)	(1)	Quarterly	Grab
Phosphorus (T)	(1)	Monthly	24 hr flow proportioned
Ammonia (NH3-N)	(1)	Annual	24 hr flow proportioned
Nitrate (NO3)	(1)	Annual	24 hr flow proportioned
Zinc (T)	(1)	Quarterly	Grab

*Calibration of flow monitoring equipment must be verified on a monthly basis. Documentation of this verification must be available to City representatives upon request. Any time the calibration is more than 5% off, the flow equipment must be recalibrated, and this recalibration documented.

The reporting period for this permit shall be monthly.

In addition to meeting the stated specific discharge limitations, the permittee is required to meet all the general discharge limitations as set forth in Section 2.1 of City Ordinance 00-11. City Ordinance 00-11 is attached hereto and incorporated herein by this reference for all purposes.

During the afore stated period the permittee is authorized to discharge process wastewater to the City of Siloam Springs sewer system from the Outfall listed below.

Description of outfall:

Outfall	**Description**
001	Effluent flume located in the South end of the pretreatment building, which is located on the Southwest corner of the main processing facility which is located on

	North Hico Street.
002	The manhole after the holding tank located on the West side of the truck wash station located in the Truck Shop which is on the corner of North Hico Street and East Tahlequah Street.
003	The manhole located on the East side of North Washington Street just West of the main processing Facility on North Hico Street.

SECTION C - BEST MANAGEMENT PRACTICES (BMPs)

1. BMP's include schedules of activities, prohibitions or practices, maintenance procedures, and other management practices to implement the prohibitions listed in Section 2.3. BMP's also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.

2. Applicable BMPs:

STANDARD CONDITIONS

SECTION D - GENERAL CONDITIONS

Duty to Comply

The permittee must comply with all conditions of this permit and all applicable provisions of the Federal Clean Water Act, 33 U.S.C. sections 1251 et seq., the Arkansas Water and Air Pollution Control Act, Ark. State. Ann. sections 82-1901 et seq., City Ordinance No. 00-11, and all orders, rules, and regulations issued pursuant to those laws. Any permit noncompliance constitutes a violation of the Federal Clean Water Act and the Arkansas Water and Air Pollution Control Act and is grounds for enforcement action, for

permit termination, revocation and re-issuance, or modification, or for denial of a permit renewal application.

Penalties for Violation of Permit Conditions

Section 6.1 of City Ordinance No. 00-11 provides that any industrial user who violates an order of the City Board of Directors or who willfully or negligently fails to comply with any provision of City Ordinance No. 00-11 and the orders, rules, regulations, and permits issued there under shall be fined not less than $100.00 nor more than $1000.00 per day of violation.

In addition, section 82-1909 of the Arkansas Water and Air Pollution Control Act provides that any person who violates any condition of a permit may be assessed a civil penalty of up to $5000.00 per day of violation.

Further, pursuant to section 1319 (a)(3) of the Federal Clean Water Act, industrial users of publicly-owned treatment works are subject to Federal enforcement action including civil penalties of up to $50,000.00 per day of violation and/or three years imprisonment for the first conviction.

Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause including, but not limited to, the following:

Violation of any terms or conditions of this permit including violation of any provision of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, City Ordinance No. 00-11, and any rules, regulations, or orders issued under those laws. This makes clear the permittee's obligation under federal, state, and local laws;

Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

A change in any conditions that requires either a temporary or permanent reduction or elimination of the authorized discharge; or

A change in or promulgation of national categorical pretreatment standards, state standards, technically based local limits or city standards applicable to the discharge authorized under this permit; or

A determination that the permitted activity endangers human health, the environment, or threatens disruption of the wastewater treatment plant and can only be regulated to acceptable levels by permit modification or termination; or

Failure of the permittee to comply with the provisions of Section III Ordinance 00-11 (Fees) as required by condition II A. 8 herein.

The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or notification of planned changes or anticipated noncompliance, does not stay any permit condition.

Toxic Pollutants

Notwithstanding Part II A.3, if an effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is promulgated under ADPC&E Regulation No. 2, as amended, (regulation establishing water quality standards for surface waters of the State of Arkansas) or Section 307(a) of the Clean Water Act for a toxic pollutant which is present in the discharge and that standard or prohibition is more stringent than the current limitation on the pollutant in this permit, this permit shall be modified or revoked and reissued to conform to the toxic effluent standard or prohibition and the permittee so notified.

A compliance schedule may be appended to the reissued permit.

Civil and Criminal Liability

Nothing in the permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, City Ordinance No. 00-11, and any rules, regulations, or orders issued under those laws or from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under any other federal, state, or local law, or the common law, including private causes of action.

Property Rights

The issuance of this permit does not convey property rights of any sort, 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.

Severability

The provisions of this permit are severable. If any provisions of this permit, or the application of any provision of this permit to a specific circumstance is held invalid, the application of such provisions to other circumstances, and the remainder of this permit, shall not be affected thereby.

Permit Fees

The permittee shall comply with all applicable fee requirements for wastewater discharge permits as described in Section III of Ordinance 00-11 (Fees). Failure to promptly remit all required fees shall be grounds for the City to initiate action to terminate this permit or to take any other action authorized by City Ordinance No. 00-11.

SECTION E - OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit and City Ordinance No. 00-11. Proper operation and maintenance includes Best Management Practices (BMPs). Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures (which may be met by third party laboratories). This provision includes a requirement for the installation and the operation of backup or auxiliary facilities or similar systems when the operation of such facilities or systems is necessary to achieve compliance with the conditions of this permit.

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. Upon reduction, loss, or failure of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or discharges or both until the facility is restored or an alternative method of treatment is provided. This requirement applies, for example when the primary source of power for the treatment facility is reduced, is lost, or alternate power supply fails.

Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge I violation of this permit which has a reasonable likelihood of adversely affecting human health, the environment or the wastewater treatment plant. Adverse effects on the wastewater treatment plant include:

Biological upset of the plant;

Pollutant loadings to the plant causing pass through to the receiving stream;

Pollutant loadings which interfere with normal sludge disposal;

Any discharge which directly or indirectly causes the plant to violate its NPDES permit.

Bypass of Treatment Facilities

Bypass not exceeding limitation. The permittee may allow any bypass to occur which does not cause effluent limitations or other permit conditions to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Part II B.4.B and 4.C.

Notice of bypass.

Anticipated bypass. If the permittee knows in advance of the need for a bypass, prior notice shall be submitted, if possible, at least ten days before the date of the bypass.

Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Part II D.6 (24 hour notice).

Prohibition of bypass.

Bypass is prohibited and the City may take enforcement action against a permittee for bypass, unless:

Pass was unavoidable to prevent loss of life, personal injury, or severe property damage (this does not include economic loss caused by delays in production);

There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if the permittee could have installed adequate backup equipment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

The permittee submitted notices as required by Part II B.4.B.

Notification of Slug Loading

In accordance with 40 CFR, Section 403.12 (f), permittee shall notify the POTW (Phone No. 524-5623) immediately of any changes at its facility affecting the potential for a slug discharge and of any slug loading of any pollutant, including oxygen demanding pollutants (BOD, etc.) released to the POTW system at a flow rate and/or pollutant concentration which has the potential to cause interference with the POTW. If the City decides that a slug control plan is needed, the plan shall contain the elements in City Ordinance 1084, Section 3.2 and such other requirements as the City may specify.

Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials (or runoff from such materials) from entering the wastewater collection system or navigable waterways or their tributaries. The permittee is responsible for obtaining the appropriate state permits required for disposal of these materials. This permit shall not be construed to authorize the generation, treatment, transport, or disposal of any materials removed during pretreatment.

Power Failure

The permittee is responsible for maintaining adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failure by such means as alternate power sources, standby generators, or retention of inadequately treated effluent.

SECTION F - MONITORING AND RECORDS

Monitoring

All monitoring and the installation and maintenance of all monitoring facilities and equipment shall be at the sole expense of the permittee. Monitoring facilities and equipment shall be constructed and maintained in accordance with the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, City Ordinance No. 00-11, and any rules, orders or regulations issued there under.

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 points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other waste stream. Monitoring points shall not be changed without notification to and approval of the City.

Automatic Resampling

If the results of the permittee's wastewater analysis indicate that a violation of this permit has occurred, the permittee must:

Inform the City of Siloam Springs of the violation within 24 hours; and

Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 30 days of the first violation.

Where the City has performed the sampling and analysis in lieu of the Industrial User, the City must perform the repeat sampling and analysis unless the City notifies the Use of the violation and requires the User to perform the repeat analysis.

Resampling is not required if:

(1) The City performs sampling at the Industrial User at a frequency of at least once per month; or

(2) The City performs sampling at the User between the time when the initial sampling was conducted and the time when the User or the City receives the results of this sampling.

Flow Measurements

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure that the accuracy of the measurements are consistent with the accepted capability of that type of device. 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. Guidance in selection, installation, calibration and operation of acceptable flow measurement devices can be obtained from the following references:

"A Guide to Methods and Standards for the Measurement of Water Flow", U.S. Department of Commerce, National Bureau of Standards, NBS Special Publication 421, May 1975, 97 pp. (Available from the U.S. Government Printing Office, Washington, D.C. 20402. Order by SD Catalog No. C13.10.421).

"Water Measurement Manual", U.S. Department of Interior, Bureau of Reclamation, Second Edition, Revised Reprint, 1974, 327 pp. (Available from the U.S. Government Printing Office, Washington, D.C. 20402. Order by Catalog No.127.19/2:w29/2, Stock No. S/N 24003-0027).

"Flow Measurement in Open Channels and Closed Conduits", U.S. Department of Commerce, National Bureau of Standards, NBS Special Publication 484, October 1977, 982 pp. (Available in paper copy or microfiche from National Technical Information Service (NTIS) Springfield, VA 22151. Order by NTIS No. PB-273535/5ST).

"NPDES Compliance Sampling Manual", U.S. Environmental Protection Agency, Office of Water Enforcement, Publication MCD-51, 1977 140 pp. (Available from the

General Services Administration (8FFS). Centralized Mailing Lists Services, Building 41, Denver Federal Center, Denver, CO 80225).

Monitoring Procedures

Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals frequent enough to insure accuracy of measurements and shall document both calibration and maintenance activities. An adequate analytical quality control program, including the analysis of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results, shall be maintained by the permittee or designated commercial laboratory.

Penalties for Tampering

City Ordinance No. 00-11, Section 6.2 authorizes a fine in the amount of $1000.00 and/or not more than six (6) months imprisonment upon conviction for falsifying, tampering, or knowingly rendering inaccurate any required monitoring device or method.

In addition, Section 82-1909 (a) of the Arkansas Water and Air Pollution Control Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate, any monitoring device or method required to be maintained under the Arkansas act shall be guilty of a misdemeanor and upon conviction thereof shall be subject to imprisonment for not more than one (1) year and/or a fine of not more than $10,000.00 per day of violation.

Section 1319(c)(4) of the Federal Clean Water Act establishes first offense penalties of up to $10,000.00 per day of violation and/or up to two (2) years imprisonment for falsifying, tampering, with, or rendering inaccurate any required monitoring device or method.

Reporting of Results

Monitoring results must be submitted in Self-Monitoring Compliance Report. Monitoring results obtained during the previous reporting period shall be summarized and reported no later than the 25th day of the month following the completed reporting period to begin

on the effective date of the permit. The report shall include information required to demonstrate compliance with Best Management Practices imposed on the permitter. Signed and certified reports as required by Part II D.11 and all other reports required by Part II D (Reporting requirements), shall be submitted to the City at the following address:

Pretreatment Coordinator
PO Box 80
Siloam Springs, AR 72761-0080

See PART I - SPECIFIC CONDITIONS for the frequency of the reporting period for this permit.

Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR 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 Compliance Report. Such increased frequency shall also be indicated in the Compliance Report.

Special Monitoring Requirements

The control authority reserves the right to require the permittee to conduct additional monitoring for the following reasons:

One time monitoring for specific pollutants to verify their presence;

Acute or chronic biomonitoring to determine the toxicity of the industrial users discharge;

Development of sludge disposal plans, slug loading control plans, or other industrial user management plans that might be required by the control authority;

Response to noncompliance, additional monitoring of regulated and nonregulated pollutants may be necessary.

Retention of Records

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip charts, recordings for continuous monitoring instrumentation, records of all documentation associated with Best

Management Practices, and copies of all reports required by this permit for a period of at least three (3) years from the date of the sample, measurement, or report. This period may be extended by request of the City at any time.

Record Contents

Records and monitoring information shall include, as a minimum, a signature and certification sheet (see Section D, Subpart 11c), a laboratory summary sheet, and a chain of custody sheet. These documents shall contain, as a minimum, the following information:

The date, exact place, time and methods of sampling or measurements;

The individual(s) who performed the sampling or measurements;

The date(s) analyses were performed;

The individual(s) who performed the analyses;

The analytical techniques or methods used;

The measurements and results of such analyses; and

Any additional information the City deems necessary.

Inspection and Entry

The permittee shall allow an authorized representative of the City, upon the presentation of credentials and other documents as may be required by law, to:

Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

Sample, inspect or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act, any substances or parameters at any location.

Best Management Practices

In cases where the Pretreatment Standard requires compliance with a Best Management Practice (or pollution prevention alternative), the permittee shall prepare and submit documentation necessary to demonstrate the permittee's compliance status with the Best Management Practice or pollution prevention alternative.

SECTION G - REPORTING REQUIREMENTS

Planned Changes

The permittee shall give notice and provide plans and specifications to the City for review and approval prior to any planned physical alterations or additions to the permitted facility meeting the following criteria:

Any change in the facility discharge (including the introduction of any new source of discharge or changes in the quantity or quality of discharges of pollutants) must be reported to the permitting authority. In no case are any new connections, increased flows, or significant changes permitted that will cause violation of the discharge limitations specified herein.

Anticipated Noncompliance

The permittee shall give advance notice to the City of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notice does not constitute any defense in any enforcement action.

Transfers

The permit is nontransferable to any person except after notice to the City. The City may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and City Ordinance No. 1084.

Monitoring Reports and Best Management Practices Documentation

Monitoring results shall be reported at the intervals and in the form specified as Part II.C.7 (Reporting of Results). Documentation of compliance with Best Management

Practices as required in this permit shall be submitted in the form specified in the Best Management Practices.

Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on interim and final requirements contained in any compliance schedule 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.

Twenty-four Hour Reporting

The permittee shall report any noncompliance which may endanger health or adversely affect the wastewater treatment facility. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause, the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue, and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The City may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

The following shall be included as information which must be reported within 24 hours:

Any unanticipated bypass which exceeds any effluent limitation in the permit;

Any upset which exceeds any effluent limitation in the permit;

Violation of a maximum daily discharge limitation for any of the pollutants listed by the City in Part I of the permit; and

Any act or event which may endanger public health or adversely affect the wastewater treatment facility.

Other Noncompliance

The permittee shall report all instances of noncompliance not reported under Part II D.4, 5 and 6 at the time monitoring reports are submitted. The reports shall contain the information listed at Part II D.6.

Changes in Discharge of Toxic Substances

The permittee shall notify the City as soon as he/she knows or has reason to believe:

That any activity has occurred or will occur which would result in the discharge, in a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the "notification levels" described in 40 CFR 122.42(a) (1) (48 FR 14153, April 1, 1983, as amended at 49 FR 38046, September 26, 1984).

That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the "notification levels" described in 40 CFR Part 122.42(a) (2) (48 FR 14153, April 1, 1983, as amended at 49 FR 38046, September 26, 1984).

Duty to Provide Information

The permittee shall furnish to the City, within a reasonable time, any information which the City 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 to the City, upon request, copies of records required to be kept by this permit.

Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application should be submitted at least 180 days before the expiration date of this permit. The City may grant permission to submit an application less than 180 days in advance but no later than 30 days prior to the permit expiration date.

Satisfactory Requirements

All applications, reports or information submitted to the City shall be signed and certified.

All permit applications shall be signed as follows:

For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means:

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

The manager of one or more manufacturing, production, or operating facilities provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater discharge permit requirements and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

For a partnership or sole proprietorship; by a general partner or the proprietor, respectively.

All reports required by the permit and other information requested by the City shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

The authorization is made in writing by a person described above;

The authorization specified either an individual or a position having responsibility for the overall operation of the regulated

facility or activity (such as the position of plant manager, superintendent, or position of equivalent responsibility). A duly authorized representative may thus be either a named individual or any individual occupying a named position; and
The written authorization is submitted to the City.

Certification

Any person signing a document under this section shall make the following 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."

Availability of Reports

Except for data determined to be confidential under 40 CFR Part 2 and Regulation 6, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the City Administration offices. The name and address of any permit applicant or permittee, permit applications, permits and effluent data shall not be considered confidential.

Penalties for Falsification of Reports

City Ordinance No. 00-11 Section 6.2 provides that any person who knowingly makes any false statements, representations, or certifications on any document filed or required under the ordinance shall, upon conviction, be punished by a fine of not more than $1,000.00 and/or imprisonment of not more than six (6) months.
In addition, Section 32-1909(a) of the Arkansas Water and Air Pollution Control Act provides that any person who knowingly makes any false statement, representation, or

certification in any application, record, report, plan, or other document filed or required to be maintained under the Arkansas law shall be subject to civil and/or criminal penalties specified in Part II, Section A.2 of this permit.

Section 1319(c)(4) of the Federal Clean Water Act provides that any person who knowingly makes any false material statement, representations, or certification in any required report or document can be subject for a first offense to up to two (2) years imprisonment and/or a fine of up to $10,000 per day of violation.

INDUSTRIAL COMPLIANCE PLAN

NOT USED

CITY OF SILOAM SPRINGS

PO BOX 80

SILOAM SPRINGS, ARKANSAS 72761-0080

WASTEWATER DISCHARGE PERMIT

Company Name Cobb Vantress

Division (if applicable) _____

Mailing Address P.O. Box 249

Siloam Springs, Arkansas 72761

Facility Address Intersection of Arkansas 59 and US Highway 412 East

Siloam Springs, Arkansas 72761

Permit Number 007

Pursuant to all terms and conditions of Ordinance No. 00-11, City of Siloam Springs, Arkansas, and subject to any applicable provision of Federal or State Law or regulation; permission is hereby granted to Cobb-Vantress, classified by SIC No. 0254 for the contribution of industrial wastewater into the City of Siloam Springs sewer lines at the plant site at Arkansas 59 and US Highway 412 East .This permit is granted in accordance with the application filed on April 14, 2011 and in conformity with all data submitted in support of the application, all of which are filed with and considered as part of this permit.

This permit is granted subject to conditions, requirements, or limitations attached hereto. Further, this permit is subject to modification, upon review, should the volume, flow, character or content of the industrial wastewater materially change.

Effective Date: May 31, 2011

Expiration Date: May 31, 2016

City Administrator David Cameron

City Administrator Signature: _____ Date: 5/31/11

BK-22/30

SPECIFIC CONDITIONS

SECTION A - DISCHARGE LIMITATIONS

COBB VANTRESS:

Pollutant	Daily Maximum (mg/l)	Maximum Monthly Average (mg/l)
Oil and Grease	100 mg/l	100 mg/l
PH	Between 6.0 - 9.0	
Total Suspended Solids	900 mg/l	600 mg/l
BOD	900 mg/l	600 mg/l
Copper	Report only mg/l	Report only mg/l
Phosphorus (T)	Report only mg/l	Report only mg/l
Ammonia (NH_3-N)	Report only mg/l	Report only mg/l
Nitrate (NO_3)	Report only mg/l	Report only mg/l
Cyanide	Report only mg/l	Report only mg/l
Maximum Discharge	300,000 GPD	300,000 GPD

The discharge limits stated in this permit are the more stringent between the City Ordinance 00-11 (Section 2.4) limits and the Code of Federal Regulations (40 CFR part 403.1 – General Provisions Point Source) limits for the conventional pollutants (Total Suspended Solids, BOD, pH and Oil and Grease). These limits are to be applied to the regulated process waste streams prior to any dilution from non-regulated or dilution waste streams. If the point at which samples are collected from this facility is subsequent to any dilution by non-regulated or dilution waste systems , then it shall be the permittee's responsibility to furnish to the City all information necessary to calculate combined waste stream limits.

RZ-23/30

SECTION B - SELF-MONITORING REQUIREMENTS

Sample Monitoring Requirements

Pollutant	Location	Frequency	Sample Type
Flow*	(1)	Daily	Record on Log (Daily)
TSS	(1)	Monthly	24 hr. flow proportioned
Oil & Grease	(1)	Monthly	Preserved Grab
PH	(1)	Monthly	Grab
BOD	(1)	Monthly	24 hr. flow proportioned
Copper (T)	(1)	Quarterly	24 hr flow proportioned
Cyanide (T)	(1)	Quarterly	Grab
Phosphorus (T)	(1)	Annual	24 hr flow proportioned
Ammonia (NH_3-N)	(1)	Annual	24 hr flow proportioned
Nitrate (NO3)	(1)	Annual	24 hr flow proportioned

*Calibration of flow monitoring equipment must be verified on a monthly basis. Documentation of this verification must be available to City representatives upon request. Any time the calibration is more than 5% off, the flow equipment must be recalibrated, and this recalibration documented.

The reporting period for this permit shall be monthly.

In addition to meeting the stated specific discharge limitations, the permittee is required to meet all the general discharge limitations as set forth in Section 2.1 of City Ordinance 00-11. City Ordinance 00-11 is attached hereto and incorporated herein by this reference for all purposes.

During the afore stated period the permittee is authorized to discharge process wastewater to the City of Siloam Springs sewer system from the Outfall listed below.

B2-24/30

Description of outfall:

Outfall	Description
001	Effluent flume located in the manhole adjacent to the Flow Monitoring Facility which is located between West of the Hatchery building, off of the East side of Highway 59, on the North side of the truck wash driveway.

SECTION C - BEST MANAGEMENT PRACTICES (BMPs)

1. BMP's include schedules of activities, prohibitions or practices, maintenance procedures, and other management practices to implement the prohibitions listed in Section 2.3. BMP's also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.

2. Applicable BMPs:

STANDARD CONDITIONS

SECTION D - GENERAL CONDITIONS

Duty to Comply

The permittee must comply with all conditions of this permit and all applicable provisions of the Federal Clean Water Act, 33 U.S.C. sections 1251 et seq., the Arkansas Water and Air Pollution Control Act, Ark. State. Ann. sections 82-1901 et seq., City Ordinance No. 00-11, and all orders, rules, and regulations issued pursuant to those laws. Any permit noncompliance constitutes a violation of the Federal Clean Water Act and the

BZ-25/36

CITY OF SILOAM SPRINGS

PO BOX 80

SILOAM SPRINGS, ARKANSAS 72761-0080

WASTEWATER DISCHARGE PERMIT

Company Name Gates Corporation

Division (if applicable) _____

Mailing Address 1801 N. Lincoln

Siloam Springs, Arkansas 72761

Facility Address 1801 North Lincoln Street

Siloam Springs, Arkansas 72761

Permit Number 005

Pursuant to all terms and conditions of Ordinance No. 00-11, City of Siloam Springs, Arkansas, and subject to any applicable provision of Federal or State Law or regulation; permission is hereby granted to Gates Rubber Company, classified by SIC No. 3052 for the contribution of industrial wastewater into the City of Siloam Springs sewer lines at the plant site at 1801 North Lincoln Street.

This permit is granted in accordance with the application filed on April 13, 2011 and in conformity with all data submitted in support of the application, all of which are filed with and considered as part of this permit.

This permit is granted subject to conditions, requirements, or limitations attached hereto. Further, this permit is subject to modification, upon review, should the volume, flow, character or content of the industrial wastewater materially change.

Effective Date: May 31, 2011

Expiration Date: May 31, 2016

City Administrator David Cameron

City Administrator Signature: _____ Date: 5/31/11

BB 26/30

SPECIFIC CONDITIONS

SECTION A - DISCHARGE LIMITATIONS

GATES RUBBER COMPANY:

Pollutant	Daily Maximum (mg/l)	Maximum Monthly Average (mg/l)
Oil and Grease	100 mg/l	100 mg/l
PH	Between 6.0 - 10.0	
Total Suspended Solids	900 mg/l	600 mg/l
Copper (T)	Report only mg/l	Report only mg/l
Cyanide (T)	Report only mg/l	Report only mg/l
Phosphorus (T)	Report only mg/l	Report only mg/l
Ammonia (NH_3-N)	Report only mg/l	Report only mg/l
Nitrate (NO_3)	Report only mg/l	Report only mg/l

The discharge limits stated in this permit are the more stringent between the City Ordinance 00-11 (Section 2.4) limits and the Code of Federal Regulations (40 CFR part 428 – Rubber Manufacturing Point Source) limits, except for the conventional pollutants (Total Suspended Solids and Oil and Grease). These limits (except TTS, and O&G) are to be applied to the regulated process waste streams prior to any dilution from non-regulated or dilution waste streams. If the point at which samples are collected from this facility is subsequent to any dilution by non-regulated or dilution waste systems , then it shall be the permittee's responsibility to furnish to the City all information necessary to calculate combined waste stream limits.

B3-27/30

SECTION B - SELF-MONITORING REQUIREMENTS

Sample Monitoring Requirements

Pollutant	Location	Frequency	Sample Type
Flow*	(1)	Daily	Record on Log (Daily)
TSS	(1)	Monthly	24 hr. flow proportioned
Oil & Grease	(1)	Monthly	Preserved Grab
PH	(1)	Monthly	Grab
Copper (T)	(1)	Quarterly	24 hr flow proportioned
Cyanide (T)	(1)	Quarterly	Grab
Phosphorus (T)	(1)	Annual	24 hr flow proportioned
Ammonia (NH_3-N)	(1)	Annual	24 hr flow proportioned
Nitrate (NO_3)	(1)	Annual	24 hr flow proportioned

*Calibration of flow monitoring equipment must be verified on a monthly basis. Documentation of this verification must be available to City representatives upon request. Any time the calibration is more than 5% off, the flow equipment must be recalibrated, and this recalibration documented.

The reporting period for this permit shall be monthly.

In addition to meeting the stated specific discharge limitations, the permittee is required to meet all the general discharge limitations as set forth in Section 2.1 of City Ordinance 00-11. City Ordinance 00-11 is attached hereto and incorporated herein by this reference for all purposes.

During the afore stated period the permittee is authorized to discharge process wastewater to the City of Siloam Springs sewer system from the Outfall listed below.

Description of outfall:

BS 28/30

Outfall	Description
001	Effluent flume located in the manhole adjacent to the Flow Monitoring Facility which is located on the Southwest corner of Gates building inside the fenced area.

SECTION C - BEST MANAGEMENT PRACTICES (BMPs)

1. BMP's include schedules of activities, prohibitions or practices, maintenance procedures, and other management practices to implement the prohibitions listed in Section 2.3. BMP's also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.

2. Applicable BMPs:

STANDARD CONDITIONS

SECTION D - GENERAL CONDITIONS

Duty to Comply

The permittee must comply with all conditions of this permit and all applicable provisions of the Federal Clean Water Act, 33 U.S.C. sections 1251 et seq., the Arkansas Water and Air Pollution Control Act, Ark. State. Ann. sections 82-1901 et seq., City Ordinance No. 00-11, and all orders, rules, and regulations issued pursuant to those laws. Any permit noncompliance constitutes a violation of the Federal Clean Water Act and the Arkansas Water and Air Pollution Control Act and is grounds for enforcement action, for permit termination, revocation and re-issuance, or modification, or for denial of a permit renewal application.

PB-29/30

Penalties for Violation of Permit Conditions

Section 6.1 of City Ordinance No. 00-11 provides that any industrial user who violates an order of the City Board of Directors or who willfully or negligently fails to comply with any provision of City Ordinance No. 00-11 and the orders, rules, regulations, and permits issued there under shall be fined not less than $100.00 nor more than $1000.00 per day of violation.

In addition, section 82-1909 of the Arkansas Water and Air Pollution Control Act provides that any person who violates any condition of a permit may be assessed a civil penalty of up to $5000.00 per day of violation.

Further, pursuant to section 1319 (a)(3) of the Federal Clean Water Act, industrial users of publicly-owned treatment works are subject to Federal enforcement action including civil penalties of up to $50,000.00 per day of violation and/or three years imprisonment for the first conviction.

Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause including, but not limited to, the following:

Violation of any terms or conditions of this permit including violation of any provision of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, City Ordinance No. 00-11, and any rules, regulations, or orders issued under those laws. This makes clear the permittee's obligation under federal, state, and local laws;

Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

A change in any conditions that requires either a temporary or permanent reduction or elimination of the authorized discharge; or

A change in or promulgation of national categorical pretreatment standards, state standards, technically based local limits or city standards applicable to the discharge authorized under this permit; or

A determination that the permitted activity endangers human health, the environment, or threatens disruption of the wastewater treatment plant and can only be regulated to acceptable levels by permit modification or termination; or

May 7, 2013

Simmons

P.O. BOX 430
SILOAM SPRINGS, ARKANSAS 72761
TELEPHONE: 479/524-8151
FAX: 479/215-2772

Mr. Tom Myers
Operations Controller
Water and Wastewater Dept.
City of Siloam Springs
P.O. Box 80
Siloam Springs, Ark. 72761

RE: Submittal of the April - 2013 CMR for the Simmons Foods Plant and Truck Shop located in Siloam Springs.

Dear Mr. Myers:

Attached is the **April 2013** data for the Simmons Foods Monthly Wastewater Report as per the requirements for Permit Number 001 on both the Processing Plant/PetFood/SFP (DN-001) and the Facility Truck Wash (DN-002).

- Included are the Compliance Monitoring Reports and the Monitoring Reports from our outside contract lab, Environmental Services, along with flow information obtained by our personnel.

I, Joe R. Earney, 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 fines and imprisonment for knowing violations.

- **NOTE:** *Values that are shaded in spreadsheets represent less than value or less than method detection limits.*

If you need any additional information or data please contact me at 215-2415 or email at jearney@simfoods.com.

Sincerely,

Joe R. Earney
Director of Environmental Quality

cc: Wes McClure
Gary Murphy (w/o encl)
Bill Paczowski (with encl)
Tim Singleton (w/o encl.)
Perry Brown (w/o encl.)
Dick Bolen (w/o encl.)
Mark Simmons (w/o encl)
Juan Anders (w/o encl)
Chris Bribesca (w/o encl)
Billie Johnson-Emporia (via scanned email w/o encl)

C - 1/14

Industrial User
Periodic Compliance Report (PCR) Certification Form

Permit #: 001

Industrial User: Simmons Prepared Foods, Inc. –Siloam Springs

Sample Date(s): **April 2013**

Monitoring Event Type(s): (check all that apply)

- ☐ self-monitoring
- ☐ City monitoring
- ☐ consent order
- ☐ compliance monitoring
- ☐ compliance order
- ☐ other:

Exceedance(s): **The pH for Truck Shop on 4/1/2013 was over the permit limit of 10 with a reading of 11.0. We had Wendy Flaming from the Southwest City plant come down and bring Rex a "new pH meter and new buffers and then go over and confirm calibration with both he, Bill Paczowski and Delores Johnson so as to keep this from occurring again.**

I, Joe R. Earney, 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 fines and imprisonment for knowing violations.

Signature of Company Official	Director of Environmental Quality Title of Company Official	May 7, 2013 Date Signed

C - 2/14

COMPLIANCE MONITORING REPORT (CMR)

PERMITTEE NAME / ADDRESS
NAME: **Simmons Food's, Inc.**
ADDRESS: **P.O. Box 430**
Siloam Springs, AR 72761
(Processing Plant)

001
PERMIT NUMBER

001
DISCHARGE NUMBER

MONITORING PERIOD					
YEAR	MONTH	DAY		YEAR	MONTH	DAY
FROM 2013	4	1	TO	2013	4	30

TOTAL MONTHLY FLOW: 13,657,740 GALLONS

PARAMETER (EFFLUENT GROSS VALUES)	PERMIT LIMIT		QUANTITY OR CONCENTRATION			NUMBER OF SAMPLES
	DAILY MAX	MONTHLY AVG.	DAILY MAX	MONTHLY AVG.	UNITS	
FLOW	2.0	2.0	0.591	0.461	MGD	25
Total Suspended Solids	900	350	112	110	mg/L	2
BOD	900	350	144	127.8	mg/L	2
Oil and Grease	100	100	18.00	6.80	mg/L	2
Total Copper	REPORT ONLY	REPORT ONLY	0.003	0.003	mg/L	1
Total Zinc	REPORT ONLY	REPORT ONLY	0.004	0.004	mg/L	1
Total Cyanide	REPORT ONLY	REPORT ONLY	0.010	0.010	mg/L	1
Total Phosphorous	REPORT ONLY	REPORT ONLY	7.6	6.00	mg/L	2
Ammonia (NH3)	REPORT ONLY	REPORT ONLY	2.60	2.60	mg/L	1
Nitrate (NO3)	REPORT ONLY	REPORT ONLY	1.86	1.86	mg/L	1
	DAILY MAX	DAILY MINIMUM	**DAILY MAX**	**DAILY MINIMUM**	UNITS	
pH	9.0	5.5	6.20	6.00	S.U.	2

NAME/TITLE AUTHORIZED AGENT		DATE		
Joe R. Earney / Director of Environmental Quality		2013	5	7
TYPED OR PRINTED	SIGNATURE OF AUTHORIZED AGENT	YEAR	MO	DAY

* **NOTE**....SEE THE PCR FOR THIS QUESTIONABLE FLOW.

C-3/14

SILOAM SPRINGS TREATMENT FACILITY

Note: Any exceedances of permit must be reported within 24hrs. of becoming aware.

	FLOW	BOD		O&G	pH	TSS		NH3	PHOS	NO3	TOT. CU	TOT. ZN	CYANIDE
DATE	(mgd)	mg/l	lbs.	mg/l	s.u.	mg/l	lbs	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l
4/1/13	0.470	144.3	565.6	4.7	6.0	112	439.0	2.6	4.4	1.86	0.003	0.004	0.01
4/15/13	0.463	111.3	429.5	18	6.2	108	416.7		7.6				
AVG	0.466	127.8	497.5	6.8		110.0	427.9	2.60	6.00	1.86	0.0030	0.0040	0.0100
Max	0.470	144.3	565.6	18.0	6.200	112.0	439.0	2.60	7.60	1.86	0.0030	0.0040	0.0100
Minimum					6.00								

Note: Values shaded denote less than values.

****USED 0.0 FOR ANY ND FOR AVERAGE COMPUTATION**

C - 4/14

MONTHLY FLOW LOG

Date	5 AM READING	
30-Mar-13	2,278,162,690	497,440
1-Apr-13	2,278,660,130	420,810
2-Apr-13	2,279,080,940	474,370
3-Apr-13	2,279,555,310	459,350
4-Apr-13	2,280,014,660	461,420
5-Apr-13	2,280,476,080	393,530
6-Apr-13	2,280,869,610	420,490
7-Apr-13	2,281,290,100	486,660
8-Apr-13	2,281,776,760	488,860
9-Apr-13	2,282,265,620	539,300
10-Apr-13	2,282,804,920	591,100 *
11-Apr-13	2,283,396,020	556,950
12-Apr-13	2,283,952,970	494,990
13-Apr-13	2,284,447,960	467,490
14-Apr-13	2,284,915,450	438,090
15-Apr-13	2,285,353,540	435,190
16-Apr-13	2,285,788,730	478,560
17-Apr-13	2,286,267,290	516,930
18-Apr-13	2,286,784,220	485,920
19-Apr-13	2,287,270,140	400,940
20-Apr-13	2,287,671,080	636,130
21-Apr-13		No Production
22-Apr-13	2,288,307,210	353,090
23-Apr-13	2,288,660,300	377,130
24-Apr-13	2,289,037,430	385,710
25-Apr-13	2,289,423,140	399,290
26-Apr-13	2,289,822,430	502,600
27-Apr-13	2,290,325,030	1,495,400
28-Apr-13		No Production
29-Apr-13		Missed Checks this day
30-Apr-13	2,291,820,430	
Total Output - Million Gallons	(25 DAYS)	13,657,740
Average Daily Output - Million Gallons		461,048
Maximum Daily Output - Million Gallons		591,100

***note**: max production day....some values may be higher on Fridays but include weekends/holidays. Therefore only used the production days, not including Fridays and Holidays to assess average.

FLOW METER CALIBRATION:

May 6, 2013 - Measured 9.24", with display showing 9.224 ~ 610 gpm.

C-5/14

COMPLIANCE MONITORING REPORT (CMR)

PERMITTEE NAME / ADDRESS
NAME: **Simmons Food's, Inc.**
ADDRESS: **P.O. Box 430**
Siloam Springs, AR 72761
(Truck Shop)

001	002
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD						
	YEAR	MONTH	DAY		YEAR	MONTH	DAY
FROM	2013	4	1	TO	2013	4	30

TOTAL MONTHLY FLOW: 81,800 GALLONS

PARAMETER (EFFLUENT GROSS VALUES)	PERMIT LIMIT DAILY MAX	PERMIT LIMIT MONTHLY AVG.	QUANTITY OR CONCENTRATION DAILY MAX	QUANTITY OR CONCENTRATION MONTHLY AVG.	UNITS	NUMBER OF SAMPLES
FLOW	REPORT ONLY	REPORT ONLY	0.0075	0.003743	MGD	21
Total Suspended Solids	REPORT ONLY	REPORT ONLY	42	42	mg/L	1
BOD	REPORT ONLY	REPORT ONLY	422	422	mg/L	1
Oil and Grease	REPORT ONLY	REPORT ONLY	306	306	mg/L	1
Total Copper	REPORT ONLY	REPORT ONLY	0.12	0.12	mg/L	N/A
Total Phosphorous	REPORT ONLY	REPORT ONLY	11.0	11.0	mg/L	1
Ammonia (NH3)	REPORT ONLY	REPORT ONLY	N/A 1.3	N/A 1.3	mg/L	N/A
	DAILY MAX	DAILY MINIMUM	DAILY MAX	DAILY MINIMUM	UNITS	
pH	10.0	5.8	11.00	11.00	pH Units	1

Violation

NAME/TITLE AUTHORIZED AGENT		DATE		
Joe R. Earney - Director of Environmental Quality		2013	5	13
TYPED OR PRINTED	SIGNATURE OF AUTHORIZED AGENT	YEAR	MO	DAY

C - 6/14

SILOAM SPRINGS TRUCK WASH

Note: Any exceedances of permit must be reported within 24hrs. of becoming aware.

	FLOW	BOD		NH3	O&G	pH	PHOS	TSS		TOT. CU
DATE	MGD	mg/l	lbs.	mg/l	mg/l	s.u.	mg/l	mg/l	lbs	mg/l
04/01/13	0.0011	422	3.87	1.30	306.00	**11.00**	11.00	42	0.39	0.12
Avg.	0.0011	422	3.87	1.30	306.0	N/A	11.00	42	0.39	0.12
Max		422	3.87	1.30	306.0	11.00	11.00	42	0.39	0.12
Min.						11.00				

Note: Shaded values denote less than values.

C-7/14

APRIL 2013 **SILOAM SPRINGS TRUCKSHOP**

TRUCK WASH METER READING

DATE		Reading	GALLONS USED
April 1, 2013		12452300	1100
April 2, 2013		12453400	800
April 3, 2013		12454200	3800
April 4, 2013		12458000	3100
April 5, 2013		12461100	6500
April 8, 2013		12467600	4500
April 9, 2013		12472100	3200
April 10, 2013		12475300	800
April 11, 2013		12476100	6700
April 12, 2013		12482800	6700
April 15, 2013		12489500	2500
April 16, 2013		12492000	7500 *
April 17, 2013		12499500	1600
April 18, 2013		12501100	1800
April 19, 2013		12502900	3100
April 22, 2013		12506000	3100
April 23, 2013		12512300	900
April 24, 2013		12513200	4900
April 25, 2013		12518100	7500
April 26, 2013		12525600	3500
April 29, 2013		12529100	5000
April 30, 2013		12534100	
Total Usage		**(21 DAYS)**	**81,800**
Avg. Daily Usage			**3,743**
Max. Daily Usage(*)			**7,500**

Note: Some readings are inclusive of multiple days and weekends.

*** Denotes monthly maximum**

C-8/14

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: 1304020018
Customer Name : SIMMONS FOODS-PLANT #1
Customer/Permit No. : 770 / 001 001
Report Date : 05/02/13

Composite Date: 04/01/03 -04/02/13
Sample Time : 1005-1105/1105,1108
Sample Type : FPC/GRABS
Sample From : EFFLUENT

Collected By: KLK
Delivery By : KLK
Work Order :
Purchase Order :

Laboratory Analysis

Analysis Date	Time	By	Parameter	Result	Notes	Quantity	Method	Quality Assurance Precision % RPD	Quality Assurance Accuracy % Recov
04/08	1345	MNM	BOD, 5-day	144.3 mg/L		565.15 #/day	SM 18th 5210B	11.71	87.
05/01	1230	MNM	Cyanide Total (as CN)	< 0.0100 mg/L		0.04 #/day	SM 18th 4500-CN E	8.50	103.
04/10	1100	TSB	Ammonia Nitrogen	2.6 mg/L		10.18 #/day	SM 18th 4500-NH3 H	3.32	105.
04/18	1030	MNM	Nitrate Nitrogen	1.86 mg/L		7.28 #/day	SM 18th 4500-NO3 E	0.00	100.
04/08	0900	TSB	Oil & Grease, Total	4.7 mg/L		18.41 #/day	EPA 1664A	9.59	88.
04/03	1105	KIK	pH	6.0 S.U.			SM 18th 4500-H+ B	0.00	N/
04/10	1000	TSB	Phosphorous, Total (as P)	4.4 mg/L		17.23 #/day	EPA 365.3	6.25	103.
04/04	1300	TSB	Solids, Total Suspended	112.0 mg/L		438.65 #/day	SM 18th 2540D	14.29	N/
04/08	1532	RAH	Copper	< 0.0030 mg/L		0.01 #/day	EPA 200.8	2.61	94.
04/08	1532	RAH	Zinc	< 0.0040 mg/L		0.02 #/day	EPA 200.8	2.27	87.
04/08	1345	MNM	Soluble BOD	102.0 mg/L		399.48 #/day	SM 18th 5210B	4.93	102.

Flow 0.469980 MGD

C-9/14

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

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 _____
Environmental Services Co., Inc.

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

CHAIN OF CUSTODY

Environmental Services Company, Inc.
Northwest Branch
1107 Century
Springdale, AR 72764
Phone 479-750-1170 Fax: :479-750-1172

Client Information		Project Information	
Company Name:	Simmons Plant # 1	Permit/Project #:	
Address:	PO BOX 430	Purchase Order #:	Qrtly Sample
	Siloam Springs, AR 72761	Sampler Name(s):	Kyle Krievens
Telephone:	(479) 524-8151	and Signature(s):	
FAX:	(479) 524-3961		
ESC Client Number:	770		

Sample Identification		Sample Collection				Sample Containers				Requested Parameters							
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	pH	Oil & Grease	BOD, TSS	Phosphorus, NH3, NO3	Cu(29.HW), Zn(30.HW)	CN		
Effluent	1304020018	4/2/13	1105	Grab	Water	Teflon	150ml	none	1	x							
Effluent	"	4/1/13-4/2/13	"	Grab	Water	glass	1 Qt	H2SO4, pH <2	1		x						
Effluent	"	4/1/13-4/2/13	1005-1105	Fpc	Water	Plastic	1QT	none/ice	1			x					
Effluent	"	"	"	Fpc	Water	Plastic	8oz	H2SO4, pH <2	1				x				
Effluent	"	"	"	Fpc	Water	Plastic	8oz	HNO3, pH <2	1					x			
Effluent	"	4/2/13	1108	Grab	Water	Plastic	1 Qt	NaOH, pH> 12	1						x		

Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time
Kyle Krievens	4/2/13	1330			
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: Lab By: (Signature and Printed Name)	Date	Time
			Kyle Krievens	4/2/13	1330

Custody Seals: Used? NJ Intact?
Turnaround: Regular X Special
Were samples properly preserved: Yes X No

Comments:
START COMPONICE Temp 0°C
Comp Temp 3.1°C

FLOW DATA		Field Test	Time	Analyst	Result	Result	Units
Analyst:	KSK	pH:	1105	KSK	6.0	5.9	
Time:	1105	Temp.:	1105	KSK	3.4		°C °F
Reading:	0.469980	DO:					
Units:	MGD	Debris:					
		Chlorinated? Yes No					

Cool all samples to 6 degrees C.

This Document is Page __ of __

C-10/14

KSK

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: 1304020278
Customer Name : SIMMONS FOODS-PLANT #1
Customer/Permit No. : 770 / 001 001
Report Date : 04/24/13

Composite Date: 04/15/13 -04/16/13
Sample Time : 1000-1000
Sample Type : FPC/GRAB
Sample From : EFFLUENT

Collected By: WDS
Delivery By : WDS
Work Order :
Purchase Order :

Laboratory Analysis

Analysis Date	Time	By	Parameter	Result	Notes	Quantity	Method	Quality Assurance Precision % RPD	Quality Assurance Accuracy % Recov
04/17	1400	TSB	BOD, 5-day	111.3 mg/L		429.13 #/day	SM 18th 5210B	0.65	91.(
04/17	0900	TSB	Oil & Grease, Total	18.0 mg/L		69.40 #/day	EPA 1664A	10.24	99.(
04/16	1000	WDS	pH	6.2 S.U.			SM 18th 4500-H+ B	0.00	N/A
04/23	1400	TSB	Phosphorous, Total (as P)	7.6 mg/L		29.30 #/day	EPA 365.3	0.00	101.(
04/18	1430	TSB	Solids, Total Suspended	108.0 mg/L		416.40 #/day	SM 18th 2540D	26.90	N/A
04/17	1400	TSB	Soluble BOD	125.0 mg/L		481.95 #/day	SM 18th 5210B	1.43	91.(

Flow 0.462670 MGD

C-11/14

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

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 _____
Environmental Services Co., Inc.

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

CHAIN OF CUSTODY

Environmental Services Company, Inc.
Northwest Branch
1107 Century
Springdale, AR 72764
Phone 479-750-1170 Fax:479-750-1172

Client Information		Project Information	
Company Name:	Simmons Plant 1	Permit/Project #:	Outfall 001
Address:	PO BOX 430	Purchase Order #:	
	Siloam Springs, AR 72761	Sampler Name(s):	Wade Schmitt
Telephone:	(479) 524-8151	and Signature(s):	Wade Schmitt
FAX:	(479) 524-3961		
ESC Client Number:	770		

Sample Identification		Sample Collection				Sample Containers				Requested Parameters							
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	pH	Oil & Grease	BOD,TSS,SBOD	Phos				
Effluent	1304020278	4-16-13	10:00	Grab	Water	Teflon	150ml	none	1	X							
Effluent				Grab	Water	glass	1 Qt	H_2SO_4,pH <2	1		X						
Effluent		4-15-13 4-16-13	10:00 10:00	Fpc	Water	Plastic	1 Qt	none/ice	1			X					
Effluent				Fpc	Water	Plastic	8 oz	H2SO4,pH <2	1				X				

Relinquished By: (Signature and Printed Name) Wade Schmitt Wade Schmitt	Date 4-16-13	Time 10:50	Received By: (Signature and Printed Name)	Date	Time	Custody Seals: Used? N Intact?
Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time	Turnaround: Regular Special
Relinquished By: (Signature and Printed Name)	Date	Time	Received for Lab By: (Signature and Printed Name) Wade Schmitt Wade Schmitt	Date 4-16-13	Time 10:50	Were samples properly preserved: Yes No

Comments: Start Comp on Ice 0°C
Composite sample temp: 4.3°C

FLOW DATA		Field Test	Time	Analyst	Result	Result	Units
Analyst:	WDS	pH:	10:00	WDS	6.2	6.2	
Time:	10:00	Temp.:					°C °F
Reading:	0.462670	DO:					
Units:	MGD	Debris:					

Cool all samples to 6 degrees C.

Chlorinated? Yes No

This Document is Page of

C-12/14

SJR

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: 1304020019
Customer Name : SIMMONS FOODS-TRUCK WASH
Customer Number : 1238
Report Date : 04/12/13

Composite Date: 04/01/13 -04/01/13
Sample Time : 1030-1630/1630, 1100
Sample Type : 6HR COMP/GRAB
Sample From : EFFLUENT

Collected By: DJ
Delivery By : DJ
Work Order :
Purchase Order :

Laboratory Analysis

Analysis Date	Time	By	Parameter	Result	Notes	Quantity	Method	Quality Assurance Precision % RPD	Quality Assurance Accuracy % Recovery
04/08	1345	MNM	BOD, 5-day	422.0 mg/L			SM 18th 5210B	11.71	87.0
04/10	1100	TSB	Ammonia Nitrogen	1.3 mg/L			SM 18th 4500-NH3 H	3.32	105.8
04/08	0900	TSB	Oil & Grease, Total	306.0 mg/L			EPA 1664A	9.59	88.9
04/03	1100	KIK	pH	11.0 S.U.	(b)		SM 18th 4500-H+ B	0.00	N/A
04/10	1000	TSB	Phosphorous, Total (as P)	11.0 mg/L			EPA 365.3	6.25	103.4
04/04	1300	TSB	Solids, Total Suspended	42.0 mg/L			SM 18th 2540D	14.29	N/A
04/08	1532	RAH	Copper	0.1200 mg/L			EPA 200.8	2.61	94.3

C-13/14

* 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 _____
Environmental Services Co., Inc.

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

CHAIN OF CUSTODY

Environmental Services Company, Inc.
Northwest Branch
1107 Century
Springdale, AR 72764
Phone 479-750-1170 Fax: 479-750-1172

Client Information		Project Information	
Company Name:	Simmons-Truck Wash	Permit/Project #:	Outfall-002
Address:	PO Box 430	Purchase Order #:	
	Siloam Springs		
Telephone:	(479) 524-8151	Sampler Name(s):	Kyle Krievens
FAX:	(479) 524-3961	and Signature(s):	
ESC Client Number:	1238		

Sample Identification		Sample Collection				Sample Containers				Requested Parameters							
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	pH	Oil & Grease	Cu(29,HW)	BOD,TSS	NH_3-N,Phosphorus			
Effluent	1304020019	4/2/13	1100	Grab	Water	teflon	150ml	none	1	X							
Effluent		4/1/13	4:30Pm	Grab	Water	glass	1 qt.	H_2SO_4,pH <2	1		X						
Effluent		4/1/13	10:30Am 4:30Pm	6 hr Comp	Water	plastic	8 oz	HNO_3,pH <2	1			X					
Effluent		4/1/13	10:30Am 4:30Pm	6 hr Comp	Water	plastic	1 qt.	none/ice	1				X				
Effluent		4/1/13	10:30Pm 4:30Pm	6 hr Comp	Water	plastic	8 oz	H_2SO_4,pH <2	1					X			

Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time	Custody Seals:
Douglas Johnson	4/2/13	1120	Kyle Krievens	4/2/13	1120	Used? Y Intact?
Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time	Turnaround:
Kyle Krievens	4/2/13	1330				Regular X Special
Relinquished By: (Signature and Printed Name)	Date	Time	Received for Lab By: (Signature and Printed Name)	Date	Time	Were samples properly preserved:
			Kyle Krievens	4/2/13	1330	Yes X No

Comments: Temp was at 36°

FLOW DATA	Field Test	Time	Analyst	Result	Result	Units
Analyst:	pH:	1100	KSK	11.0	11.0	
Time:	Temp.:					°C °F
Reading:	DO:					
Units:	Debris:					

Cool all samples to 6 degrees C.

Chlorinated? Yes No

This Document is Page __ of __

C-4/1/14

SJR

City of Siloam Springs
Industrial Pretreatment Program Inspection Report

Date: 4/4/2013

Reported By: Tom Myers

A. Facility Description

Name Simmons Food Contact Name Joe Earney

Location Address 601 North Hico

Mailing Address P.O. Box 430 Siloam Springs, AR 72761

Principal Product/Service Chicken Processing Deboning Plant #2 - Pet Food Plant Truckwash

Permit EO1 SIC Code(s) (NAICS 311111) – SIC 2047 Pet Food / Truckwash 4212 SIC

Categorical ☐ Significant Noncategorical ☒ Undetermined ☐

Operation Schedule: Hours/Day 7/6 Days/Week __ Weeks/Year 52

Scheduled Plant Shutdown Periods Holidays Thanksgiving - Christmas

Plant Activities During Shutdowns None

Employees Per Shift: 1st __, 2nd __ 3rd

See 2013 Questionnaire

B. Inspection Description

Entry Time 9:00 Exit Time 11:15

Inspection Type (Check all that apply):

Scheduled ☐ Partial ☐ Unscheduled (2 hrs notice or less) ☒

User Classification ☐ Demand (no notice) ☐ Pre-Permit ☐

Initial ☐ Compliance Follow-Up ☐ Comprehensive ☒

Other _____

Attendance:

Name/Title	Facility/Agency	Telephone Number
Joe Earney	Simmons Food	479-415-2415

C. Waste Stream Description (All Facilities)

Reviewed Plant Schematic(s)? ☑ Yes ☐ No

Schematic(s) on file with Control Authority? ☑ Yes ☐ No

If not on file, contacted? ☐ Yes ☐ No

	Schematic Includes yes	Schematic Includes no	Reviewed Actual Site yes	Reviewed Actual Site no	Condition (Good, bad, poor)
Location(s) incoming water	☑	☐	☑	☐	Good
Regulated Waste stream(s)	☑	☐	☑	☐	
Unregulated Waste stream(s)	☑	☐	☑	☐	
Dilutional Waste stream(s)	☑	☐	☑	☐	
All floor drains/trenches	☑	☐	☑	☐	
Locations of					
Chemical storage area(s)	☑	☐	☑	☐	
Raw material storage area(s)	☑	☐	☑	☐	
Acid use area(s)	☑	☐	☑	☐	
Caustic use area(s)	☑	☐	☑	☐	
Other area(s)	☑	☐	☑	☐	
Specially handled materials	☐	☐	☐	☐	
Explain Other: _____					
Layout of:					Good
Major plant feature(s)	☑	☐	☑	☐	
Pretreatment facility(ies)	☑	☐	☑	☐	
Location of drainage from:					
Boiler(s)	☑	☐	☑	☐	
Cooling system(s)	☑	☐	☑	☐	
Dehumidifier(s)	☑	☐	☑	☐	
Air pollution control equip	☑	☐	☑	☐	
Sanitary sewer connection(s)	☑	☐	☑	☐	
Storm sewer connection(s)	☑	☐	☑	☐	

D. Describe Process Streams

SEE: Questionnaire 2013 for typed discription.

E. Sample Location(s) Each

Sample Location No. 1 Verified During Inspection? ☑ Yes ☐ No

Sample Location Description Sample Location S.E. Corner of DAF Pretreatment facility. Sampler collects 2 Sample in flow meter Parshall flume area

Estimated Volume/Description of:
Regulated Flow See Annual Questionnaire
Unregulated Flow
Dilutional Flow

Self Monitoring Methods:

Flow Measurement Approved?	☑ Yes	☐ No
Verified During Inspection?	☑ Yes	☐ No
Flow Meter Calibrated?	☑ Yes	☐ No
Reviewed Records?	☑ Yes	☐ No
Collection Methods Approved?	☑ Yes	☐ No
Verified During Inspection?	☑ Yes	☐ No

Comments: Major reduction in flow from all operations.

F. Industry Self-Monitoring Program

Has the approved self-monitoring program been implemented? ☑ Yes ☐ No
(If not, check ☐ and go to the next page.)
All regulated waste streams sampled? ☑ Yes ☐ No
Verified? ☑ Yes ☐ No
Sampling performed by: Industry ☐ Contract Lab ☑
Analysis performed by: Industry ☐ Contract Lab ☑
Industry personnel responsible for sampling and/or analysis trained to do so?
☐ Yes ☐ No
By whom?
Name/Address of contract lab(s): (ESC) Environmental Service Co. Inc., 1107 Century Avenue, Springdale, AR

Records kept of dates, times, locations, methods and names of persons taking sample:
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No
Records kept of regulated production, continuous and batch discharge schedules, observations, etc on sampling days?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No
Records kept of time and method of sample preservation?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No
Are refrigerated autosamplers and refrigerators used for sample storage at a temperate of 6° 4°C or below, but not freezing?
☑ Yes ☐ No Verified during Inspection? ☐ Yes ☑ No
Is there an appropriate thermometer in each?
☑ Yes ☐ No Verified during Inspection? ☐ Yes ☑ No
Records kept of dates, times, methods of sample delivery to contract lab, and names of persons receiving samples?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No
Chain-of-custody records being used?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No

D-3/7

Records on site of all analytical results for at least 3 years?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No

G. Pretreatment System

Is there a pretreatment system? ☑ Yes ☐ No Is it Approved? ☑ Yes ☐ No
Description _____
Contributing Processes _____

Is system operated per approved plans?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No
Is system operated per approved schedule?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No
Is there an assigned operator? ☑ Yes ☐ No
Has the operator been trained? ☑ Yes ☐ No
Is the system regularly maintained?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No
Are grease traps/waste pits routinely cleaned?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No
Are operational and maintenance records kept?
☑ Yes ☐ No Verified during Inspection? ☑ Yes ☐ No
Can this system be bypassed by obvious means? ☐ Yes ☑ No
If yes, who was this reported to? _____

Comments:
Area around Pretreatment system Cleanned Screens and DAF systems Running fine as designed

H. Residuals Management

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

Two DAF units collect fat and debris and waste pumped to temporary storage tanks. TRS takes material to ADEQ permitted site for disposal.
See Annual Questionnaire for more details.

Are residuals classified as hazardous wastes? ☐ Yes ☑ No
Are records kept? ☑ Yes ☐ No
Reviewed during inspection? ☑ Yes ☐ No
Should handling, storage and/or disposal of wastes be discussed further with solid/hazardous waste specialist? ☐ Yes ☑ No
If yes, indicate what additional steps, if any, are required. _____

See Questionnaire 2013

I. 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.

See Questionnaire 2013

Are waste oils petroleum-based? ☑ Yes ☐ No
Records kept? ☑ Yes ☐ No
Reviewed during inspection? ☑ Yes ☐ No
Should handling, storage and/or disposal of wastes be discussed further with oil/hazardous waste specialist? ☑ Yes ☐ No
If yes, indicate what additional steps, if any, are required.

J. Solvent/Toxic Organic Management (STO)

Is there an approved STO plan? ☐ Yes ☐ No
Reviewed prior to inspection? ☐ Yes ☐ No
If yes, is this plan being implemented? ☐ Yes ☐ No
Verified during inspection? ☐ Yes ☐ No
Is there any evidence of discharge of solvents or defined toxic organics to sanitary sewer?
☐ Yes ☐ No
Is there potential for discharge of solvents or defined toxic organics to sanitary sewer?
☐ Yes ☐ No

Comments: See Questionnaire 2013

K. Accidental Spill and Discharge Control

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

	YES	NO	DISCHARGE	VERIFIED
Chemical storage area(s)	☐	☑		☑
Acid use area(s)	☐	☑		☑
Caustic use area(s)	☐	☑		☑
Raw materials storage area(s)	☐	☑		☑
Maintenance shop area(s)	☑	☐		☐
Paint application area(s)	☐	☑		☐

Are there spill facilities? ☑ Yes ☐ No
Where discharged to? Confirm
Does User have an approved ASPP? ☑ Yes ☐ No
Reviewed prior to inspection? ☑ Yes ☐ No
Is there a need for an ASPP? ☑ Yes ☐ No
If no, explain why. See Questionnaire 2013

Is a Slug Control Plan currently required? ☑ Yes ☐ No
If a Slug Control Plan is currently required, does the plan adequately:
Describe discharge practices? ☑ Yes ☐ No
Identify and locate chemicals stored at the facility ? ☑ Yes ☐ No
Provide procedures for immediately notifying the City of a slug discharge or threatened slug discharge? ☑ Yes ☐ No
Provide procedures for preventing adverse impacts from accidental spills (e.g., inspection and maintenance of chemical storage areas)? ☑ Yes ☐ No

Comments:
See Questionnaire 2013

L. Defined Pollutants

List pollutants coming into direct contact with waste stream that discharges into POTW.
Only B.O.D., pH, TSS, PD organic waste after pretreatment from DAF unit.

List pollutants that have the potential to access the POTW collection system by spill, accidental discharge, machinery malfunction, etc.
— None —

M. Close Out Interview

Attending: Joe Earney - Tom Myers

Findings:	OK	NOT OK	COMMENTS
Waste stream schematic(s)	☑	☐	
Regulated process(es)	☑	☐	
Sample location(s)	☑	☐	
Self-monitoring program	☑	☐	
Compliance schedule	☑	☐	
Pretreatment system	☑	☐	
Residuals management program	☑	☐	
Waste oil management program	☐	☐	
STO management program	☐	☐	
Spill and Slug Discharge plans, procedures and postings	☑	☐	
Reporting	☑	☐	
Certification	☑	☐	
Notification	☑	☐	

Other: Simmons always calls if working on unscheduled days or Holidays. Calls if they are going to shut down for maintenance or problems.

N. Follow-Up

Date of next inspection: Yet to be determined

Other notes or comments on inspection:
Good Cooperation with industry and Staff, Call to report problems and Holiday work schedules.

See Questionnaire for typed details.

Corrective action to be taken:
None at this time

Inspector: Tom Myers

D-7/7

SILOAM SPRINGS WASTEWATER TREATMENT PLANT MONTHLY REPORT

	FLOW			pH		EFFLUENT	CHLORINE	FECAL COLIFORM	
DATE	INF	EFF	RAINFALL	INF	EFF	D.O.	RESIDUAL	COL./	7 DAY
	MGD	MGD	INCHES	S.U.	S.U.	MG/L	MG/L	100 ML.	AVG.
3/31/2013									194.00
4/1/2013	3.6	3.1	0.1						194.00
4/2/2013	5.0	4.3	0.4	7.18	7.23	9.14	0.02	194.00	194.00
4/3/2013	3.8	3.3	0.1						194.00
4/4/2013	3.4	3.3	0.0						194.00
4/5/2013	3.0	2.3	0.0						194.00
4/6/2013	2.6	2.3	0.0						194.00
4/7/2013	2.5	2.2	0.2						98.00
4/8/2013	2.7	2.5	0.0						98.00
4/9/2013	2.6	2.2	0.3	7.24	7.36	8.97	0.01	98.00	98.00
4/10/2013	6.2	5.4	1.7						98.00
4/11/2013	4.5	3.9	0.0						98.00
4/12/2013	3.6	3.1	0.1						98.00
4/13/2013	3.1	2.7	0.0						98.00
4/14/2013	2.8	2.5	0.0						162.00
4/15/2013	3.0	2.6	0.0						162.00
4/16/2013	2.7	2.6	0.0	7.08	7.33	8.27	0.01	162.00	162.00
4/17/2013	4.4	4.1	2.6						162.00
4/18/2013	8.9	7.3	0.0						162.00
4/19/2013	5.3	4.3	0.0						162.00
4/20/2013	4.3	3.8	0.0						162.00
4/21/2013	3.7	3.3	0.0						206.00
4/22/2013	3.5	3.0	0.0						206.00
4/23/2013	3.1	2.8	0.2	7.03	7.39	9.04	0.01	206.00	206.00
4/24/2013	2.7	2.5	0.0						206.00
4/25/2013	2.6	2.2	0.2						206.00
4/26/2013	4.5	3.9	1.0						206.00
4/27/2013	5.7	4.8	0.5						206.00
4/28/2013	3.9	3.4	0.0						
4/29/2013	3.4	3.0	0.0						
4/30/2013	3.2	2.9	0.0	7.04	7.21	8.43	0.01		
TOTAL	114.3	99.6	7.4						
AVG.	3.8	3.3	0.2			8.8	0.01	158.71	157.53
F.W.A.									
HIGH	8.9	7.3	2.6	7.24	7.39	9.14	0.02	206	206.00
LOW	2.5	2.2	0.0	7.03	7.21	8.27	0.01	98	98

Reviewed by:_____ Date:_____

Reviewed by:_____ Date:_____

E-1/4

SILOAM SPRINGS WASTEWATER TREATMENT PLANT MONTHLY REPORT

PAGE TWO

	BOD/CBOD						AMMONIA					
DATE	INF	INF	EFF	EFF	7 DAY	%	INF	INF	EFF	EFF	7 DAY	%
	MG/L	# / DAY	MG/L	# / DAY	AVG MG/L	REMOVAL	MG/L	# / DAY	MG/L	# / DAY	AVG MG/L	REMOVAL
31					2.34						0.014	
1					2.34						0.014	
2					2.34						0.014	
3	104	3296	2.34	64.4	2.34	98.0	10.60	336	0.014	0.4	0.014	99.9
4					2.34						0.014	
5					2.34						0.014	
6					2.34						0.014	
7					1.45						0.010	
8					1.45						0.010	
9					1.45						0.010	
10	204	10548	1.45	65.3	1.45	99.4	14.80	765	0.010	0.5	0.010	99.9
11					1.45						0.010	
12					1.45						0.010	
13					1.45						0.010	
14					1.29						0.936	
15					1.29						0.936	
16					1.29						0.936	
17	232	8513	1.29	44.1	1.29	99.5	16.20	594	0.936	32.0	0.936	94.6
18					1.29						0.936	
19					1.29						0.936	
20					1.29						0.936	
21					2.92						0.130	
22					2.92						0.130	
23					2.92						0.130	
24	181	4076	2.92	60.9	2.92	98.5	12.80	288	0.130	2.7	0.130	99.1
25					2.92						0.130	
26					2.92						0.130	
27					2.92						0.130	
28												
29												
30												
TOTAL		26433.6		234.7				1983.9		35.6		
AVG.	180.3	6608.4	2.00	58.67	2.0	98.9	13.6	496	0.273	8.89	0.282	98.4
F.W.A.												
HIGH	232	10548	2.9	65.3	2.92	99.5		765.3	0.936	32.0	0.94	99.9
LOW	104	3296	1.3	44.1	1.29	98.0	10.6	288.2	0.010	0.4	0.010	94.6

SILOAM SPRINGS WASTEWATER TREATMENT PLANT MONTHLY REPORT

PAGE THREE

	TSS						NO3 TOTAL					
DATE	INF	INF	EFF	EFF	7 DAY	%	INF	INF	EFF	EFF	7 DAY	
	MG/L	# / DAY	MG/L	# / DAY	AVG MG/L	REMOVAL	MG/L	# / DAY	MG/L	# / DAY	AVG MG/L	
31					5.6						7.86	
1					5.6						7.86	
2					5.6						7.86	
3	129	4088	5.60	154.1	5.6	96.2	0.863	27.35	7.860	216	7.86	
4					5.6						7.86	
5					5.6						7.86	
6					5.6						7.86	
7					1.0						5.61	
8					1.0						5.61	
9					1.0						5.61	
10	230	11893	1.00	45.0	1.0	99.6	0.464	23.99	5.610	253	5.61	
11					1.0						5.61	
12					1.0						5.61	
13					1.0						5.61	
14					2.0						0.43	
15					2.0						0.43	
16					2.0						0.43	
17	230	8440	2.00	68.4	2.0	99.2	0.462	16.95	0.431	15	0.43	
18					2.0						0.43	
19					2.0						0.43	
20					2.0						0.43	
21					1.5						6.91	
22					1.5						6.91	
23					1.5						6.91	
24	290	6530	1.50	31.3	1.5	99.5	0.392	8.83	6.910	144	6.91	
25					1.5						6.91	
26					1.5						6.91	
27					1.5						6.91	
28												
29												
30												
TOTAL		30951		298.8								
AVG.	220	7738	2.53	74.7	2.4	98.64	0.55	19.28	5.20	156.95	5.1	
F.W.A.												
HIGH	290	11893	5.6	154.1	5.60	99.6	0.86	27.35	7.86	252.65	7.86	
LOW	129	4088	1.0	31	1.0	96.2	0.392	8.827	0.4	14.74	0.4	

E-3/4

SILOAM SPRINGS WASTEWATER TREATMENT PLANT MONTHLY REPORT

PAGE FOUR

	TOTAL PHOSPHORUS					
DATE	INF	INF	EFF	EFF	7 DAY	%
	MG/L	# / DAY	MG/L	# / DAY	AVG MG/L	REMOVAL
31					0.61	
1					0.61	
2					0.61	
3	2.76	87	0.612	16.84	0.61	80.7
4					0.61	
5					0.61	
6					0.61	
7					0.42	
8					0.42	
9					0.42	
10	4.85	251	0.421	18.96	0.42	92.4
11					0.42	
12					0.42	
13					0.42	
14					0.22	
15					0.22	
16					0.22	
17	5.12	188	0.217	7.42	0.22	96.1
18					0.22	
19					0.22	
20					0.22	
21					0.15	
22					0.15	
23					0.15	
24	4.08	92	0.148	3.09	0.15	96.6
25					0.15	
26					0.15	
27					0.15	
28						
29						
30						
TOTAL AVG.	4.20	154.50	0.350	[illegible]	0.3	91.5
F.W.A. HIGH	5.12	250.8	0.6	18.96	[illegible]	96.6
LOW	2.76	87.47	0.15	3.09	0.1	80.7

E - 4/4

NPDES ID(s): AR0020273
Major/Minor Indicator:
Violation Date: 06/01/2010 - 02/28/2013
Violation Type(s):

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 05/08/2013
Report Version 1.2, Modified: 01/03/2011

AR0020273

Permittee Name:	SILOAM SPRINGS, CITY OF	**Primary SIC Code:**	4952	**Permit Issued:**	09/30/2007
Permittee Address:	975 ANDERSON AVE SILOAM SPRINGS, AR 72761	**Primary SIC Desc:**	Sewerage Systems	**Permit Effective:**	10/01/2007
		Primary NAICS Code:		**Permit Expired:**	09/30/2012
Major/Minor Indicator:	Major	**Primary NAICS Desc:**		**Permit Status:**	Admin Continued
Compliance Track. Status:	On	**Cognizant Official:**	THOMAS MYERS/DAVID CAMERON,ADM		
DMR Non Receipt Flag:	On	**Receiving Body:**	SAGER CR,FLINT CR,ILLINOIS R		
RNC Tracking Flag:	On				

Facility Information

Facility Name:	SILOAM SPRINGS, CITY OF	**County:**	Benton	**FRS ID:**	110000510242
Facility Location:	975 ANDERSON AVE SILOAM SPRINGS, AR 72761	**Region:**	06	**Federal Facility Ownership:**	N
		State-Region:		**Type of Ownership:**	Municipal or Water District

F-1/2

Effluent Violations

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	07/31/2011	001-A	00665 - Phosphorus, total (as P)	1	0	1		C3 7 DA AVG	2.14 mg/l	43%	<=1.5 mg/l		
E90	03/31/2011	001-A	00665 - Phosphorus, total (as P)	1	0	1		Q1 MO AVG	54.27 lb/d	47%	<=37 lb/d		
E90	03/31/2011	001-A	00665 - Phosphorus, total (as P)	1	0	1		C2 MO AVG	2.13 mg/l	113%	<=1 mg/l		
E90	03/31/2011	001-A	00665 - Phosphorus, total (as P)	1	0	1		C3 7 DA AVG	4.73 mg/l	215%	<=1.5 mg/l		
E90	06/30/2010	001-A	00610 - Nitrogen, ammonia total (as N)	1	0	1		Q1 MO AVG	89.36 lb/d	62%	<=55 lb/d	T 06/30/2010	2 09/30/2010
E90	06/30/2010	001-A	00610 - Nitrogen, ammonia total (as N)	1	0	1		C2 MO AVG	3.19 mg/l	113%	<=1.5 mg/l	T 06/30/2010	2 09/30/2010

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g. **X**) indicate the NODI code will not automatically resolve RNC.
Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

WHOLE EFFLUENT TOXICITY TESTING SUMMARY

Permit Number: **AR0020273** AFIN: **04-00106**
Facility Name:**Siloam Springs** Outfall Number: **001**
Critical Dilution: **100%** Testing Frequency: **semi-annual**
Date of Review: **5/8/2013** Name of Reviewer: **M. Barnett**

Number of tests performed during previous 5 years by species:
***Pimephales promelas* (Fathead minnow): 17**
***Ceriodaphnia dubia* (water flea): 17**

Failed test dates during previous 5 years by species:

	Lethal	Sub-lethal
***Pimephales promelas* (Fathead minnow):**	None	None
***Ceriodaphnia dubia* (water flea):**	None	February 2009

G- 1/1

FACT SHEET

SIMMONS INDUSTRIES
601 NORTH HICO
Siloam Springs, AR 72761

Permit #001

Local Contacts: Joe R. Earney
Director Environmental Quality
(479)-415-2290

Gary Murphy
President of Poultry Operations
(479)-415-2290

User Classification: Permitted Industrial Wastewater Discharger

SIC Code: 0215

Annual Certification Requirements: Flow Meter Calibration

Accidental Spill Prevention Plan: On File
MSDS's on File

Confidential Information: All non-wastewater related information is strictly confidential.

Reporting Frequency: Monthly

EFFLUENT LIMITS & MONITORING REQUIREMENTS

	EFFLUENT LIMITS		MONITORING REQUIREMENTS	
	DAILY MAX / MONTHLY AVG	DAILY MIN		
FLOW	2,000,000 MGD	2,000,000 MGD	DAILY	N/A
BOD	900	350	MONTHLY	YEARLY
TSS	900	350	MONTHLY	YEARLY
OIL & GREASE	100	100	MONTHLY	YEARLY
COPPER (T)	REPORT ONLY		QUARTERLY	YEARLY
CYANIDE (T)	REPORT ONLY		QUARTERLY	YEARLY
ZINC (T)	REPORT ONLY		QUARTERLY	YEARLY
AMMONIA (NH_3-N)	REPORT ONLY		SEMI-ANNUAL	YEARLY
PHOSPHORUS (T)	REPORT ONLY		MONTHLY	YEARLY
NITRATE (NO_3)	REPORT ONLY		SEMI-ANNUAL	YEARLY
	DAILY MAX S.U.	DAILY MIN S.U.		
pH	9.0	5.5	MONTHLY	YEARLY

H-1/3

FACT SHEET (CON'T.)

Employees: Total on Site
Shift #1
Shift #2
Shift #3

Description of Production Processes

Plant #1. Facility is a poultry slaughter plant for initial poultry processing with fully automated and state of the art kill, de-feathering, and evisceration equipment.

Pet Foods is attached to Plant #1 use of fresh offal, feed grain pre-mix with addition of any needed minerals and vitamins. Product is canned, labeled, and packaged for many customers/suppliers going to the Pet Food markets.

Truck Shop/Wash is Simmons owned, managed truck maintenance and fuel station where fleet tractors are fueled and repaired as needed; with tractors and trailers being washed using phosphate free soap as needed.

Plant #2. Facility is a further processing facility with deboning and individually frozen (I.F.) processes. This plant receives its raw material from the Simmons plants in Siloam Plant #1 and the Southwest City, Missouri Plant, and also from Decatur Plant.

Description of Discharges:

1.	Sanitary Sewer	17,000 Avg/gpd
2.	Cooling Water, non contact	10,000 Avg/gpd
3.	Cooling Water, contact	100,000 Avg/gpd
4.	Boiler/Tower Blowdown	3,000 Avg/gpd
5.	Production Processes	1,500,000 Avg/gpd
6.	Contained in Product	115,000 Avg/gpd
7.	Ice Production	64,000 Avg/gpd

Process Flow Description:

Wash down and clean up water from Plant #1, Plant #2, Pet Food operations as well as truck washdown.

Pretreatment Process Used:

Wastewater is screened then polymer added prior to (2) Habersham DAF units. Waste solids from DAF units are collected and pumped to on-site temporary storage

Pretreatment Process Operational Problems:

Grease trap can overflow solids if not cleaned with proper frequency.

Pollutants of Interest:

BOD, Copper, TSS

Sample Site:

Outfall #001 - Self-Monitoring and City Monitoring – located in the manhole adjacent to the flow monitoring facility that is located between west of the hatchery building, off of the east side of Ark. Hwy. 59, on the nouth side of the truck wash driveway.

Floor Drains:

Floor drains in all process areas go to the sewer. Floor drains in the chemical storage area are plugged.

Air Pollution Control Equipment:

None.

Solid Waste Disposal:

TRS
333 W. Henri De Tonti Blvd. #5
Springdale, AR 72762

ADF
3801 East Sunshine
Springfield, MO 65809

Discharge Limits:

See page 1.

Garver Engineers, LLC

1088 East Millsap Road
Fayetteville, Arkansas 72703

479-527-9100
FAX 479-527-9101

www.garverengineers.com

GARVER|ENGINEERS

TRANSMITTAL

To: ADEQ **Date:** 8-12-08

Attn: Kim Fuller

From: Shane Oyler

RE: Siloam Springs WWTP Improvements

Copies To: Garver File 07057000

QTY	DATE	DESCRIPTION
1	May 2008	Plans and Specifications
1		Form 1
1		Arkansas Attachment Forms
1		Design Criteria Summary
1		Design Calculations and Max Month Mass Balance

For your review and comment, please find the attached review set of plans and specifications for the subject project. In accordance with the RLF provisions, please note that the attached documents represent the RLF Initial Submittal of the Plans and Specifications. Based on the Memorandum of Agreement, Final Plans and Specifications are due on or before August 31, 2008.

Also attached is Form 1 as well as Arkansas Attachment Forms. We will forward a signed copy of Form 1 and EPA Form 2A under separate cover. As discussed, we are anticipating forwarding a copy of EPA Form 2A that was used on the 2007 NPDES permit renewal.

Design calculations, including the max month mass balance, are attached. To aid review, we have also attached a design criteria summary that compares design criteria to the "Recommended Standards for Wastewater Treatment Facilities".

A set of the plans and specifications has been forwarded to ADH and ANRC. We have received and responded to comments from ADH. We will forward ADH acceptance letter to your attention, once received.

We would like to schedule a meeting with the reviewer as soon as possible to discuss the project. It is important to us that this project meets ADEQ, ANRC, and ADH approval and can bid this year. In that regard, please do not hesitate to contact me if additional information is needed or would help expedite the review process.

We appreciate your review and input on this project.

Sincerely,
Garver Engineers
Shane Oyler

City of Siloam Springs, AR
5.3 mgd WWTP
Design Criteria Summary

Treatment Plant			
Description	**Design Criteria**	**10-State Standard**	**Variance Requested**
Design Year - 2030	20 Year		
Design Population	28,288		
Industrial Flow	1.5 mgd		
Design Capacity			
Current Average Day	3.1 mgd		
Average Day	5.3 mgd		
Max Month Avg	7.2 mgd		
Peak Day	10.3 mgd		
Hydraulic	15.0 mgd		
Design Loadings			
$CBOD_5$			
Current	7,213 lb/d		
Average	12,332 lb/d		
Max Month	16,753 lb/d		
Peak Day	14,174 lb/d		
TSS			
Current	10,135 lb/d		
Average	17,327 lb/d		
Max Month	23,539 lb/d		
Peak Day	33,830 lb/d		
NH3-N			
Current	504 lb/d		
Average	862 lb/d		
Max Month	1,171 lb/d		
Peak Day	2,147 lb/d		
TP			
Current	165 lb/d		
Average	282 lb/d		
Max Month	384 lb/d		
Peak Day	274 lb/d		
Design Temperature	13 - 24 Degrees C		
Type of Treatment	Combined Biological Nutrient Removal - UCT		
Design Effluent Targets (Monthly Average)			
$CBOD_5$	15 mg/L		
TSS	20 mg/L		
NH_3-N			
April	1.8 mg/L		
May-October	1.5 mg/L		
November-March	4.0 mg/L		
Dissolved Oxygen	7.0 mg/L		
Fecal Coliform			
April - September	200 colonies/100 mL		
October - March	1,000 colonies/100 mL		
Total Residual Chlorine	<0.1 mg/L		
Total Phosphorus	1.0 mg/L		
pH	6.0 - 9.0 s.u.		

Primary Clarification			
Description	**Design Criteria**	**10-State Standard**	**Variance Requested**
Clarifier			
Number	2	> 1	
Type	Circular, Spiral Scrapers, Scum and Density Current Baffles		
Diameter	80 ft ; 70 ft		
Sidewall Depth	12-ft	> 10 ft	
Surface Overflow Rate			
Average Day	614 gpd / ft^2 ; 614 gpd / ft^2	< 1,000 gpd / ft^2	
Peak Day	1,158 gpd / ft^2 ; 1,158 gpd / ft^2	< 2,000 gpd / ft^2	
Weir Overflow Rate			
Peak Day	23,153 ; 20,259 gpd / ft	< 30,000 gpd / ft	
Solids Loading Rate			

APPENDIX C

Sample Permit Application Form

Disclaimer

The U.S. Environmental Protection Agency (EPA), Office of Wastewater Management, Water Permits Division has prepared this sample permit application as a guide for Control Authorities in developing a permit application form. The Control Authority is not required to use this permit application form and may develop either its own form or choose to modify the sample form to reflect specific conditions at the publicly owned treatment works (POTW) and requirements of state and local law. For the Control Authority choosing to use a modified version of the sample application, the EPA sample permit application provides, as an aid to the Control Authority, blank spaces or brackets throughout the application. These identify areas in which additions and changes to the sample application might be needed to address the circumstances at a POTW. The sample has additional bracketed notes that further explain issues the Control Authority might wish to consider when developing its permit application form.

APPENDIX C.
SAMPLE PERMIT APPLICATION FORM

Note: Please read all attached instructions prior to completing this application.

SECTION A – GENERAL INFORMATION

1.	Facility Name:			
	a. Operator Name:			
	b. Is the operator identified in 1.a., the owner of the facility?		Yes	No
	If no, provide the name and address of the operator and submit a copy of the contract and/or other documents indicating the operator's scope of responsibility for the facility.			
2.	Facility Address: Street:			
	City:	State:	Zip:	
3.	Business Mailing Address: Street or P.O. Box:			
	City:	State:	Zip:	
4.	Designated signatory authority of the facility: [Attach similar information for each authorized representative]			
	Name:			
	Title:			
	Address:			
	City:	State:	Zip:	
	Phone #			
5.	Designated facility contact:			
	Name:			
	Title:			
	Phone #			
6.	***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]*** Do you wish to be considered for regulation under a general permit, if the Control Authority considers it to be appropriate? If so, you must file a request for coverage under a general control mechanism. **[POTW's should include list of available general control mechanisms]**		Yes	No

J-3/32

SECTION B – BUSINESS ACTIVITY

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

	Industrial Categories
☐	Aluminum Forming
☐	Asbestos Manufacturing
☐	Battery Manufacturing
☐	Can Making
☐	Canned and Preserved Fruit and Vegetable Processing
☐	Canned and Preserved Seafood
☐	Carbon Black Manufacturing
☐	Cement Manufacturing
☐	Centralized Waste Treatment
☐	Coal Mining
☐	Coil Coating
☐	Concentrated Animal Feeding Operation and Feedlots
☐	Concentration Aquatic Animal Production
☐	Copper Forming
☐	Dairy Product Processing or Manufacturing
☐	Electric and Electronic Components Manufacturing
☐	Electroplating
☐	Explosives Manufacturing
☐	Fertilizer Manufacturing
☐	Ferroalloy Manufacturing
☐	Foundries (Metal Molding and Casting)
☐	Glass Manufacturing
☐	Grain Mills
☐	Gum and Wood Chemicals Manufacturing
☐	Hospital
☐	Ink Formulation
☐	Inorganic Chemicals
☐	Iron and Steel
☐	Landfill
☐	Leather Tanning and Finishing
☐	Meat and Poultry Products
☐	Metal Finishing
☐	Metal Products and Machinery
☐	Mineral Mining and Processing
☐	Nonferrous Metals Forming
☐	Nonferrous Metals Manufacturing
☐	Oil and Gas Extraction
☐	Ore Mining
☐	Organic Chemicals Manufacturing
☐	Paint and Ink Formulating

J- 4/32

	☐	Paving and Roofing Manufacturing
	☐	Pesticides Chemical Manufacturing, Formulating, and/or Packaging
	☐	Petroleum Refining
	☐	Pharmaceutical Manufacturing
	☐	Phosphate Manufacturing
	☐	Photographic Processing
	☐	Plastic and Synthetic Materials Manufacturing
	☐	Porcelain Enameling
	☐	Printed Circuit Board Manufacturing
	☐	Pulp, Paper, and Fiberboard Manufacturing
	☐	Rubber Manufacturing
	☐	Soap and Detergent Manufacturing
	☐	Steam Electric Power Generating
	☐	Sugar Processing
	☐	Textile Mills
	☐	Timber Products
	☐	Transportation Equipment Cleaning
	☐	Waste Combustors
	☐	Other (Describe)

2. Give a brief description of all operations at this facility including primary products or services (attach additional sheets if necessary):

3. Indicate applicable North American Industry Classification System (NAICS) for all processes:

a.	
b.	
c.	
d.	
e.	

4. Production Rate

Product	Past Calendar Year Amounts per Day (Daily Units)		Estimate This Calendar Year Amounts Per Day (Daily Units)	
	Average	Maximum	Average	Maximum

5. For production-based categorical IUs only:

What is the facility's long-term average categorical production rate for the past 5 years?

J-5/32

SECTION C – WATER SUPPLY

1.	Water Sources: (Check as many as are applicable.)			
		Private Well		
		Surface Water		
		Municipal Water Utility (Specify City):		
		Other (Specify):		
2.	Name (as listed on the water bill):			
	Street:			
	City:		State:	Zip:
3.	Water service account number:			
4.	List average water usage on premises: [new facilities may estimate]			
		Type	Average Water Usage (GPD)	Indicate Estimated (E) or Measured (M)
	a.	Contact cooling water		
	b.	Non-contact cooling water		
	c.	Boiler feeding		
	d.	Process		
	e.	Sanitary		
	f.	Air pollution control		
	g.	Contained in product		
	h.	Plant and equipment washdown		
	i.	Irrigation and lawn watering		
	j.	Other		
	k.	Total of a through j		

J-6/32

SECTION D – SEWER INFORMATION

1. a. For an existing business:
Is the building presently connected to the public sanitary sewer system?

Yes	Sanitary sewer account number—		
No	Have you applied for a sanitary sewer hookup?	Yes	No

b. For a new business:

(i).	Will you be occupying an existing vacant building (such as in an industrial park)?	Yes	No
(ii).	Have you applied for a building permit if a new facility will be constructed?	Yes	No
(iii).	Will you be connected to the public sanitary sewer system?	Yes	No

2. List size, descriptive location, and flow of each discharge pipe or discharge point which connects to the City's sewer system. (If more than three, attach additional information on another sheet.)

Descriptive Location of Sewer Connection or Discharge Point	Average Flow (GPD)

J-7/32

SECTION E – WASTEWATER DISCHARGE INFORMATION

1.	Does (or will) this facility discharge any wastewater other than from restrooms to the City sewer?						
	Yes	If the answer to this question is "yes," complete the remainder of the application.					
	No	If the answer to this question is "no," skip to Section I.					
2.	Provide the following information on wastewater flow rate. [New facilities may estimate.]						
	a. Hours/day discharged (e.g., 8 hours/day)						
	M	T	W	TH	F	SAT	SUN
	b. Hours of discharge (e.g., 9 a.m. to 5 p.m.)						
	M	T	W	TH	F	SAT	SUN
	c. Peak hourly flow rate	(GPD)					
	d. Maximum daily flow rate	(GPD)					
	e. Annual daily average	(GPD)					
3.	If batch discharge occurs or will occur, indicate: [New facilities may estimate.]						
	a. Number of batch discharges	(per day)					
	b. Average discharge per batch	(GPD)					
	c. Time of batch discharges	(days of week)	(hours of day)				
	d. Flow rate	(gallons per minute)					
	e. Percent of total discharge						

J-8/32

4.	Schematic Flow Diagram – For each major activity in which wastewater is or will be generated, draw a diagram of the **flow of materials, products, water, and wastewater** from the start of the activity to its completion, showing all unit processes. Indicate which processes use water and which generate wastestreams. Include the average daily volume and maximum daily volume of each wastestream [new facilities may estimate]. If estimates are used for flow data this **must** be indicated. **Number each unit process** having wastewater discharges to the community sewer. Use these numbers when showing this unit processes in the building layout in Section H.

J - 9/32

5. List average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both), for each plant process. Include the reference number from the process schematic that corresponds to each process. [New faculties should provide estimates for each discharge].

No.	Process Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)

6. List the average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both) for each of nonprocess wastewater flows (i.e., cooling tower blowdown, boiler blowdown)

No.	Nonprocess Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (bath, continuous, none)

7. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow equipment at this facility?

		Yes	No	N/A
Current	Flow Metering			
	Sampling Equipment			
Planned	Flow Metering			
	Sampling Equipment			

If so, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below:

8. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics? Consider production processes as well as air or water pollution treatment processes that may affect the discharge.

	Yes
	No, (skip to Question 10)

J-16/32

9.	Briefly describe these changes and their effects on the wastewater volume and characteristics: (attach additional sheets if needed).		
10.	Are any recycling or reclamation system in use or planned?		
	☐ Yes		
	☐ No (skip to Question 12)		
11.	Briefly describe recovery process, substance recovered, percent recovered, and the concentration in the spent solution. Submit a flow diagram for each process (attach additional sheets if needed):		
12.	***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]*** As allowed at 40 CFR 403.6(c)(5) when the limits in a categorical Pretreatment Standard are expressed only in terms of pollutant concentration, an Industrial User may request that the Control Authority convert the limits to equivalent mass limits. Do you anticipate that you will make this request?	☐ Yes	☐ No
13.	***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]*** As allowed at 40 CFR 403.6(c)(6), an Industrial User subject to the mass limits of categorical Pretreatment Standards to 40 CFR Parts 414, 419, and/or 455 may request that the Control Authority convert the mass limits to equivalent concentration limits. Do you anticipate that you will make this request?	☐ Yes	☐ No

J-11/32

SECTION F – CHARACTERISTICS OF DISCHARGE

All current industrial users are required to submit monitoring data on all pollutants that are regulated specific to each process. Use the tables provided in this section to report the analytical results. **Do not leave blanks.** For all other (nonregulated) pollutants, indicate whether the pollutant is known to be present (P), suspected to be present (S), or known not to be present (O), by placing the appropriate letter in the column for average reported values. Indicate on either the top of each table, or on a separate sheet, if necessary, the sample location and type of analysis used. Be sure methods conform to 40 CFR Part 136; if they do not, indicate what method was used.

New dischargers should use the table to indicate what pollutants will be present or are suspected to be present in proposed wastestreams by placing a P (expected to be present), S (may be present), or O (will not be present) under the average reported values.

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
Acenaphthene								
Acrolein								
Acrylonitrile								
Benzene								
Benzidine								
Carbon Tetrachloride								
Chlorobenzene								
1,2,4-Trichlorobenzene								
Hexachlorobenzene								
1,2-Dichloroethane								
1,1,1-Trichloroethane								
1,1,2,2,-Tetrachloroethane								
Chloroethane								
Bis(2-Chloroethyl)ether								
17 Bis (chloro methyl) ether								
2-Chloroethyl vinyl Ether								
2-Chloronaphthalene								
2,4,6-Trichlorophenol								
Parachlorometa cresol								
Chloroform								
2-Chlorophenol								
1,2-Dichlorobenzene								
1,3-Dichlorobenzene								
1,4-Dichlorobenzene								
3,3'-Dichlorobenzidine								
1,1-Dichloroethylene								
1,2-Trans-Dichloroethylene								
2,4-Dichlorophenol								
1,2-Dichloropropane								
1,2-Dichloropropylene								
1,3-Dichloropropylene								
2,4-Dimethylphenol								
2,4-Dinitrotoluene								
2,6-Dinitrotoluene								
1,2-Diphenylhydrazine								
Ethylbenzene								
Fluoranthene								

J - 12/32

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
4-Chlorophenyl Phenyl Ether								
4-Bromophenyl Phenyl Ether								
Bis(2-Chloroethyl)ether								
Bis(2-chloroethoxy)methane								
Methylene Chloride								
Methyl Chloride								
Bromoform								
Dichlorobromomethane								
Chlorodibromomethane								
Hexachlorobutadiene								
Hexachlorocyclopentadiene								
Isophorone								
Naphthalene								
Nitrobenzene								
Nitrophenol								
2-Nitrophenol								
4-Nitrophenol								
2,4-Dinitrophenol								
4,6-Dinitro-O-Cresol								
N-Nitrosodimethylamine								
N-Nitrosodiphenylamine								
N-Nitrosodi-N-Propylamine								
Pentachlorophenol								
Phenol								
Bis(2-ethylyhexyl)phthalate								
Butylbenzyl Phthalate								
Di-N-Butyl Phthalate								
Di-N-Octyl Phthalate								
Diethyl Phthalate								
Dimethyl Phthalate								
Benzo(a)anthracene								
Benzo(a)pyrene								
3,4-Benzofluoranthene								
Benzo(k)fluoranthene								
Chrysene								
Acenaphthylene								
Anthracene								
Benzo(ghi)perylene								
Fluorene								
Phenanthrene								
Dibenzo(a,h)anthracene								
Indeno(1,2,3-cd)pyrene								
Pyrene								
Tetrachloroethylene								
Toluene								
Trichloroethylene								
Vinyl Chloride								
Aldrin								
Dieldrin								
Chlordane								
4,4'-DDT								
4,4'-DDE								

J - 13/32

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
4,4'-DDD								
Alpha-Endosulfan								
Beta-Endosulfan								
Endosulfan Sulfate								
Endrin								
Endrin Aldehyde								
Heptachlor								
Heptachlor Epoxide								
Alpha-BHC								
Beta-BHC								
Gamma-BHC								
Delta-BHC								
PCB-1242								
PCB-1254								
PCB-1221								
PCB-1232								
PCB-1248								
PCB-1260								
PCB-1016								
Toxaphene								
(TCDD)								
Asbestos								
Acidity								
Alkalinity								
Bacteria								
BOD_3								
Chloride								
Chlorine								
Fluoride								
Hardness								
Magnesium								
NH_3-N								
Oil and Grease								
TSS								
TOC								
Kjeldahl N								
Nitrate N								
Nitrite N								
Organic N								
Orthophosphate P								
Phosphorous								
Sodium								
Specific Conductivity								
Sulfate (SO_4)								
Sulfide (S)								
Sulfite (SO_3)								
Antimony								
Arsenic								
Barium								
Beryllium								
Cadmium								
Chromium								

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
Copper								
Cyanide								
Lead								
Mercury								
Nickel								
Selenium								
Silver								
Thallium								
Zinc								
Any additional pollutants regulated by state or local laws:								

[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.] Do you anticipate requesting a monitoring waiver for regulated pollutants which you believe to not be present in your process wastestream(s)?	Yes	No
[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.] In order to request a monitoring waiver for pollutants not present, you must provide data from at least one sampling of your facility's wastewater prior to any treatment present at your facility that is representative of all wastewater from all processes. The request of a monitoring waiver must be signed in accordance with 40 CFR 403.12(l), and include the certification statement in 40 CFR 403.6(a)(2)(ii). Do you wish to make this request?	Yes	No

SECTION G - TREATMENT

1.	Is any form of wastewater treatment (see list below) practiced at this facility?	
	☐	Yes
	☐	No
2.	Is any form of wastewater treatment (or changes to an existing wastewater treatment) planned for this facility within the next three years?	
	☐	Yes, describe:
	☐	No
3.	Treatment devices or processes used or proposed for treating wastewater or sludge (check as many as appropriate).	
	☐	Air flotation
	☐	Centrifuge
	☐	Chemical precipitation
	☐	Chlorination
	☐	Cyclone
	☐	Filtration
	☐	Flow equalization
	☐	Grease or oil separation, type:
	☐	Grease trap
	☐	Grinding filter
	☐	Grit removal
	☐	Ion exchange
	☐	Neutralization, pH correction
	☐	Ozonation
	☐	Reverse osmosis
	☐	Screen
	☐	Sedimentation
	☐	Septic tank
	☐	Solvent separation
	☐	Spill protection
	☐	Sump
	☐	Rainwater diversion or storage
	☐	Biological treatment, type:
	☐	Other chemical treatment, type:
	☐	Other physical treatment, type:
	☐	Other, type:
4.	Is process wastewater mixed with nonprocess wastewater prior to the sampling point?	
	☐	Yes, describe:
	☐	No

J-16/32

4.	Description Describe the pollutant loadings, flow rates, design capacity, physical size, and operating procedures of each treatment facility checked above.			
5.	Attach a process flow diagram for each existing treatment system. Include process equipment, by-products, by-product disposal method, waste and by-product volumes, and design and operating conditions.			
6.	Describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer. Please include estimated completion dates.			
7.	Do you have a treatment operator?		Yes	No
	(If Yes)	Name:		
		Title:		
		Phone:		
		Full time (specify hours):		
		Part time (specify hours):		
8.	Do you have a manual on the correct operation of your treatment equipment?		Yes	No
9.	Do you have written maintenance schedule for your treatment equipment?		Yes	No

J-17/32

SECTION H – FACILITY OPERATIONAL CHARACTERISTICS

1. Shift Information

		Mon	Tues	Wed	Thur	Fri	Sat	Sun
Work days								
Shifts per work day								
Employees per shift	1st							
	2nd							
	3rd							
Shift start and end times	1st							
	2nd							
	3rd							

2. Indicate whether the business activity is:

☐ Continuous through the year, or

☐ Seasonal (circle the months of the year during which the business occurs):

J	F	M	A	M	J	J	A	S	O	N	D

Comments:

3. Indicate whether the facility discharge is:

☐ Continuous through the year, or

☐ Seasonal (circle the months of the year during which the business occurs):

J	F	M	A	M	J	J	A	S	O	N	D

Comments:

4. Does operation shut down for vacation, maintenance, or other reasons?

☐ Yes, indicate reasons and period when shutdown occurs

☐ No

5. List types and amounts (mass or volume per day) of raw materials used or planned for use (attach list if needed):

J - 18/32

6. List types and quantity of chemicals used or planned for use (attach list if needed). Include copies of Material Safety Data Sheets (if available) for all chemicals identified.

Chemical	Quantity

7. Building Layout – Draw to scale the location of each building on the premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram), public sewers, and each facility sewer line connected to the public sewers. **Number each sewer** and show existing and proposed sampling locations.

   A blueprint or drawing of the facilities showing the above items may be attached in lieu of submitting a drawing on this sheet.

J-19/32

SECTION I – SPILL PREVENTION

1.	Do you have chemical storage containers, bins, or ponds at your facility?	Yes	No
	If yes, please give a description of their location, contents, size, type, and frequency and method of cleaning. Also indicate in a diagram or comment on the proximity of these containers to a sewer or storm drain. Indicate if buried metal containers have cathodic protection.		
2.	Do you have floor drains in your manufacturing or chemical storage area(s)?	Yes	No
	If yes where do they discharge to?		
3.	If you have chemical storage containers, bins, or ponds in manufacturing area, could an accidental spill lead to a discharge to (check all that apply):		
	☐ an onsite disposal system		
	☐ public sanitary sewer system (e.g., through a floor drain)		
	☐ storm drain		
	☐ to ground		
	☐ other, specify:		
	☐ not applicable, no possible discharge to any of the above routes		
4.	Do you have an accidental spill prevention plan (ASPP) to prevent spills of chemicals or slug discharges from entering the Control Authority's collection systems?		
	☐ Yes – **[Please enclose a copy with the application.]**		
	☐ No		
	☐ N/A, not applicable since there are no floor drains and/or the facility discharge(s) only domestic wastes.		
5.	Please describe below any previous spill events and remedial measures taken to prevent their reoccurrence.		

J-20/32

SECTION J – BEST MANAGEMENT PRACTICES

1.	Describe the types of best management practices (BMPs) you employ to prevent pollutants from entering a facility's wastestream or from reaching a discharge point. BMPs are management and operational procedures such as schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the general and specific prohibitions listed in 40 CFR 403.5(a)(1) and (b). BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.		
2.	Do you have the potential for a slug discharge to the sewer system? A slug discharge is any discharge of a non-routine episodic nature, including but not limited to an accidental spill or a 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 [40 CFR 403.8(f)(2)(v).	Yes	No
	Please describe the type of the potential slug discharge, including quality and content.		
	Please describe current mechanisms for prevention of slug discharges.		
	Please describe where and how raw materials are stored.		

J - 21/32

SECTION K – NON-DISCHARGED WASTES

1. Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?

	Yes, please describe below
	No, skip the remainder of Section J

Waste Generated	Quantity (per year)	Disposal Method

2. Indicate which wastes identified above are disposed of at an off-site treatment facility and which are disposed of on-site.

3. If any of your wastes are sent to an off-site centralized waste treatment facility, identify the waste and the facility.

4. If an outside firm removes any of the above checked wastes, state the name(s) and address(es) of all waste haulers:

a.		b.	
	Permit No. (if applicable):		Permit No. (if applicable):

5. Have you been issued any Federal, State, or local environmental permits?

	Yes
	No

If yes, please list the permit(s):

6. Describe where and how waste liquids and sludges are stored.

J-22/32

SECTION L – AUTHORIZED SIGNATURES

Compliance certification:

1. Are all applicable Federal, State, or local pretreatment standards and requirements being met on a consistent basis?

	Yes
	No
	Not yet discharging

2. If **No**:

a.	What additional operations and maintenance procedures are being considered to bring the facility into compliance? Also, list additional treatment technology or practice being considered in order to bring the facility into compliance.
b.	Provide a schedule for bringing the facility into compliance. Specify major events planned along with reasonable completion dates. Note +that if the Control Authority issues a permit to the applicant, it may establish a schedule for compliance different from the one submitted by the facility.

Milestone Activity	Completion Date

J-23/32

Authorized Representative 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.

Name(s) Title

Signature Date Phone

INSTRUCTIONS TO FILL OUT WASTEWATER DISCHARGE PERMIT APPLICATION

The permit application must be completed through question E.1. If you answer "no" to question E.1., you may skip to Section I. Otherwise, if a question is not applicable, indicate so on the form. Instructions to some questions on the permit application are given below.

SECTION A – INSTRUCTIONS (GENERAL INFORMATION)

1. Enter the facility's official or legal name. Do not use a colloquial name.

    a. Operator Name: Give the name, as it is legally referred to, of the person, firm, public organization, or any other entity which operates the facility described in this application. This may or may not be the same name as the facility.

    b. Indicate whether the entity which operates the facility also owns it by marking the appropriate box:

        (i) If the response is "No," clearly indicate the operator's name and address and submit a copy of the contract and/or other documents indicating the operator's scope of responsibility for the facility.

2. Provide the physical location of the facility that is applying for a discharge permit.

3. Provide the mailing address where correspondence from the Control Authority may be sent.

4. Provide all the names of the authorized signatories for this facility for the purposes of signing all reports. The designated signatory is defined as:

    a. A responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, 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 operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

    b. A general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

    c. The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agents.

J-25/32

d. A duly authorized representative of the individual designated in paragraph (a), (b), or (c) of this section if:

(i) the authorization is made in writing by the individual described in paragraph (a), (b), or (c);

(ii) the authorization specifies either an individual or 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 City.

e. If an authorization under paragraph (d) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (d) of this section must be submitted to the City prior to or together with any reports to be signed by an authorized representative.

5. Provide the name of a person who is thoroughly familiar with the facts reported on this form and who can be contacted by the Control Authority (e.g., the plant manager).

6. ***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]***

Indicate if the facility would like to be considered for regulation under a general permit.

SECTION B – INSTRUCTIONS (BUSINESS OPERATIONS)

1. Check off all operations that occur or will occur at your facility. If you have any questions regarding how to categorize your business activity, contact the Control Authority for technical guidance.

2. Provide a brief narrative description of all operations at this facility.

3. For all processes found on the premises, indicate the NAICS (North America Industry Classification System) code which replaces the Standard Industrial Classification (SIC) system. To determine the NAICS code for a facility see *North American Industry Classification System--United States, 2002* which includes definitions for each industry, tables showing correspondence between 2002 NAICS and 1997 NAICS for codes that changed, and a comprehensive index--features also available on this web site. To order the 1400-page *2002 Manual*, in print, call NTIS at (800) 553-6847 or (703) 605-6000, or check the NTIS web site. The 1250-page *1997 Manual*, showing correspondence between 1997 NAICS and 1987 SIC, is also available. The 2002 and 1997 versions of NAICS are available on CD-ROMs, which can be ordered at NTIS. See http://www.census.gov/epcd/www/naics.html which lists NAICS codes and definitions for each industry.

4. List the types of products, giving the common or brand name and the proper or scientific name. Enter from your records the average and maximum amounts produced daily for each operation for the previous calendar year, and the estimated total daily production for this calendar year. Be sure to specify the daily units of production. Attach additional pages as necessary.

5. Provide the facility's long-term average production value for the past 5 years.

J-26/32

SECTION C – INSTRUCTION (WATER SUPPLY)

4. Provide daily average water usage within the facility. Contact cooling water is cooling water that during the process comes into contact with process materials, thereby becoming contaminated. Non-contact cooling water does not come into contact with process materials. Sanitary water includes only water used in restrooms. Plant and equipment washdown includes floor washdown. If sanitary flow is not metered, provide an estimate based on 15 gallons per day (gpd) for each employee.

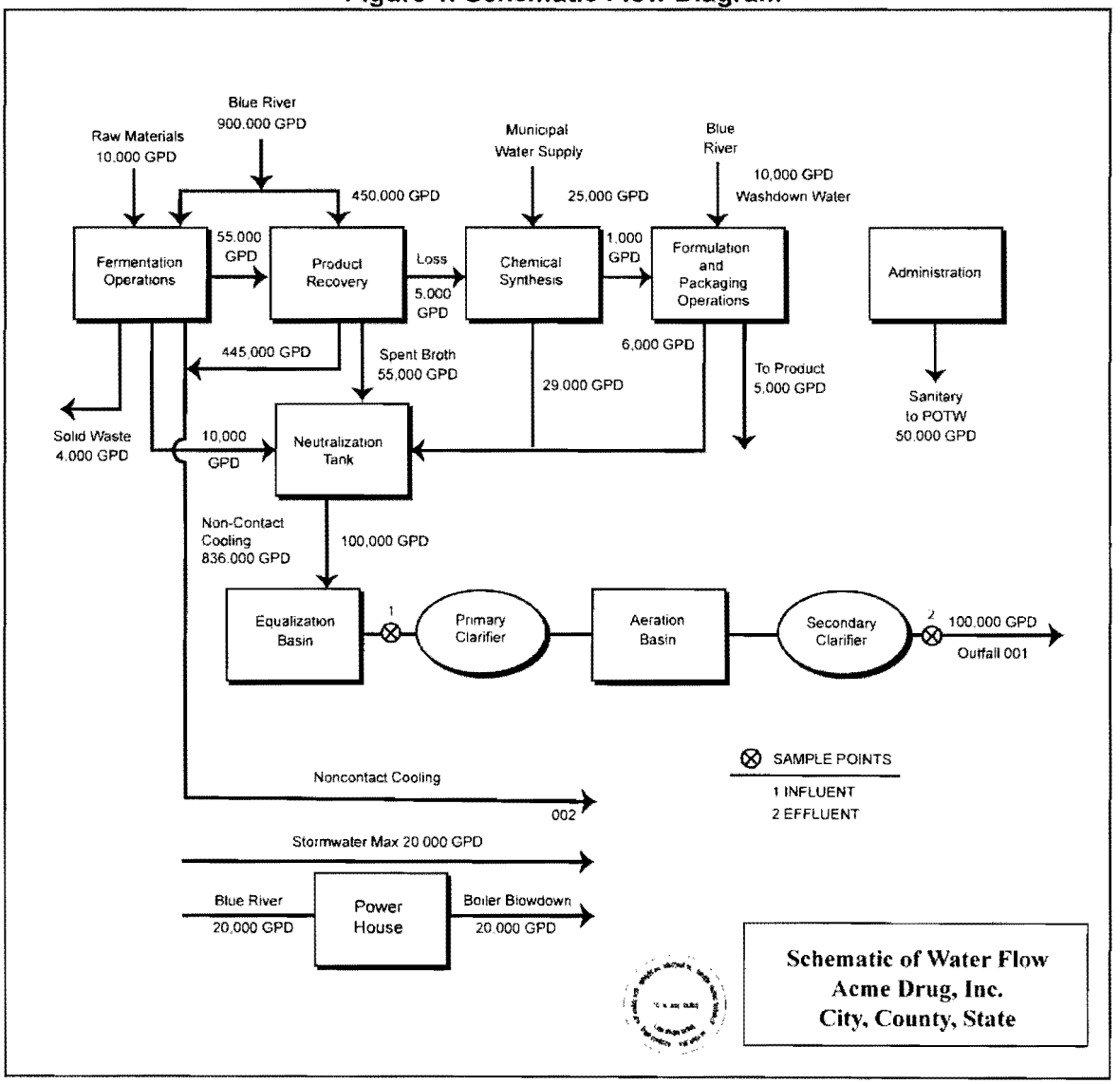
J-27/32

SECTION E – INSTRUCTION (WASTEWATER DISCHARGE INFORMATION)

1. If you answer "no" to this question, skip to Section I, otherwise complete the remainder of the application.

4. A schematic flow diagram is required to be completed and certified for accuracy by a State registered professional engineer. Assign a sequential reference number to each process starting with No. 1. An example of a drawing is shown below in Figure 1. To determine your average daily volume and maximum daily volume of wastewater flow, you may have to read water meters, sewer meters, or make estimates of volumes that are not directly measurable.

Figure 1. Schematic Flow Diagram



J-28/32

5. Users should report average daily and daily maximum wastewater flows from each process, operation, or activity present at the facility. Categorical users should report average daily and maximum daily wastewater flows from every regulated, unregulated, and dilution process. A regulated wastestream is defined as wastewater from an industrial process that is regulated for a particular pollutant by a categorical pretreatment standard. Unregulated wastestreams are wastestreams from an industrial process that are not regulated by a categorical pretreatment standard and are not defined as a dilution wastestream. Dilution wastestreams include sanitary wastewater, boiler blowdown, noncontact cooling water or blowdown, stormwater streams, demineralized backwash streams and process wastestreams from certain industrial subcategories exempted by EPA from categorical pretreatment standards. [For further details see 40 CFR 403.6 (e).]

6. Users should report the average daily and daily maximum wastewater flows for each nonprocess wastewater flows. Nonprocess wastewater flows include, but are not limited to, cooling tower blowdown and boiler blowdown.

12. ***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]***

    The facility should indicate whether or not it anticipates requesting for equivalent mass limits.

13. ***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]***

    If the facility is subject to 40 CFR Parts 414, 419, or 455, it should indicate whether or not it anticipates requesting for equivalent concentration limits.

SECTION F – INSTRUCTION (CHARACTERISTICS OF DISCHARGE)

Provide the results of sampling and analysis identifying the nature and concentration (or mass, if required) or regulated pollutants in the discharge from each regulated process. Both daily maximum and average concentration values (or mass, if required) must be reported. The sample must be representative of daily operations.

If the User is subject to categorical effluent limits, the user must take a minimum of one representative sample to compile the necessary data. Samples should be taken immediately downstream from pretreatment facilities if such exists or immediately downstream from the regulated process if no pretreatment exists. If other wastewaters are mixed with the regulated wastewater prior to pretreatment, the user should measure the flows and concentrations. Sampling and analysis must be performed in accordance with the techniques prescribed in 40 CFR part 136 and amendments thereto. Furthermore, the date and place, and the methods of analysis must be submitted with the application.

Historical data may be used if the data provides sufficient information to determine the need for industrial pretreatment measures.

J-29/32

SECTION H – INSTRUCTION (FACILITY OPERATIONAL CHARACTERISTICS)

2. Indicate whether the business activity is continuous throughout the year or if it is seasonal. If the activity is seasonal, circle the months of the year during which the discharge occurs. Make any comments you feel are required to describe the variation in operation of your business activity.

4. Indicate any shut downs in operation which may occur during the year and indicate the reasons for shutdown.

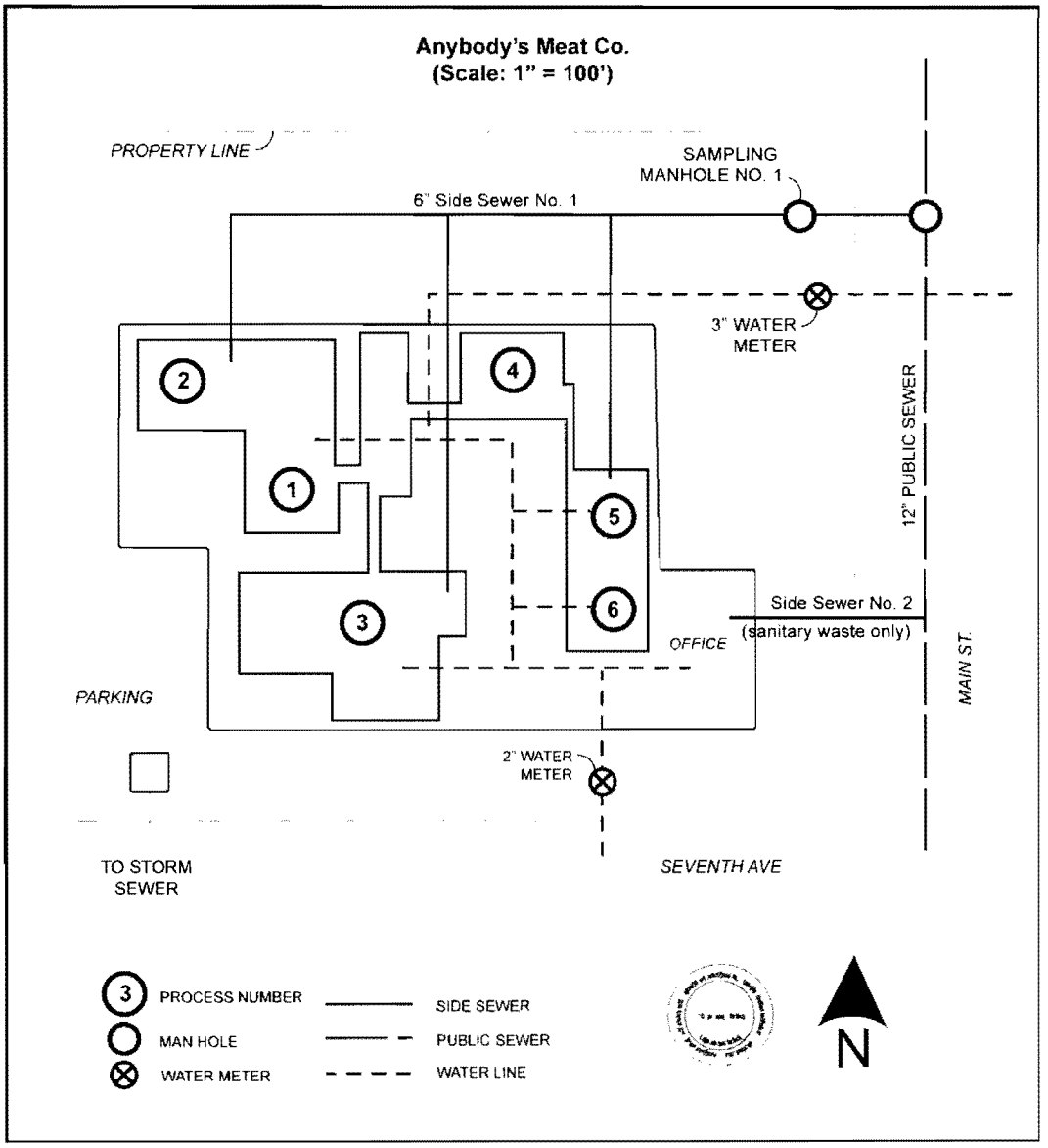
5. Provide a listing of all primary raw materials used (or planned) in the facility's operations. Indicate amount of raw material used in daily units.

6. Provide a listing of all chemicals used (or planned) in the facility's operations. Indicate the amount use of planned in daily units. Avoid the use of trade names of chemicals. If trade names are used, also provide chemical compounds. Provide copies of all available material safety data sheets for all chemical identified.

7. A building layout or plant site plan of the premises is required to be completed and certified for accuracy by a State registered professional engineer. Approved building plans may be submitted. An arrow showing North as well as the map scale must be shown. The location of each existing and proposed sampling location and facility sewer line must be clearly identified as well as all sanitary and wastewater drainage plumbing. Number each unit process discharging wastewater to the public sewer. Use the same number system shown in Figure 2, the schematic flow diagram. An example of the drawing required is shown below.

J-30/32

Figure 2. Building Layout



J-31/32

SECTION I – INSTRUCTION (SPILL PREVENTION)

5. Describe how the spill occurred, what was spilled, when the spill happened, where it occurred, how much was spilled, and whether or not the spill reached the sewer. Also explain what measures have been taken to prevent a reoccurrence or what measures have been taken to limit damage if another spill occurs.

SECTION J – INSTRUCTIONS (NON-DISCHARGED WASTES)

1. For wastes not discharged to the Control Authority's sewer, indicate types of waste generated, amount generated, the way in which the waste is disposed (e.g., incinerated, hauled, etc.), and the location of disposal.

2. Onsite disposal system could be a septic system, lagoon, holding pond (evaporative-type), etc.

5. Types of permits could be: air, hazardous waste, underground injection, solid waste, NPDES (for discharges to surface water), etc.

SECTION K – INSTRUCTIONS (AUTHORIZED SIGNATURES)

See instructions for question 4 in Section A, for a definition of an authorized representative.

J-32/32