

ADEQ

ARKANSAS
Department of Environmental Quality

August 3, 2007

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

Re: City of Siloam Springs (Permit Number: AR0020273 AFIN: 04-00106) 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 21, 2007. The report should be made available for review to appropriate City officials; you and the City officials should discuss and evaluate the recommendations and required actions in the report. Please respond in writing within thirty (30) days to my findings with the City's proposed actions.

The department would like to thank you for your cooperation during the audit. 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 you or any of your associates have questions , please do not hesitate to contact this office.

Sincerely,



Rufus J. Torrence
ADEQ Pretreatment Engineer

Encl: Audit/Assessment Checklist

Cc: Lee Bohme / EPA 6WQ-PM (via e-mail w attmt)
Frank Esry / ADEQ Inspector Supervisor (w/o attmt)
Dennis Benson / ADEQ NPDES Enforcement (w/o attmt)

NPDES PERMIT FILE
NPDES # AR0020273
AFIN # 04-00106
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**PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT**

CITY OF SILOAM SPRINGS, ARKANSAS

NPDES PERMIT #AR0020273

August 3, 2007

PREPARED BY: RUFUS TORRENCE

NPDES STATE PRETREATMENT ENGINEER

ADEQ

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LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

- Section I: General Information

- Section II: Program Analysis and Profile

- Section III: Industrial User File Review

- Reportable Noncompliance (RNC) Worksheet

- SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation

A) INTRODUCTION

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

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

An audit/assessment was performed June 18 – June 21, 2007 on the Pretreatment Program implemented by the City of Siloam Springs, Arkansas. Participants included:

Rufus Torrence	ADEQ / Pretreatment Engineer
Tom Meyers	Wastewater Superintendent/Pretreatment Coordinator
Trevor Bowman	Public Works Director

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/reducing 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

EPA originally approved Siloam Springs' Pretreatment Program on 8/22/84. The City submitted a partial program modification on 9/5/91.

The City submitted a more complete program modification in March 1995; later the City submitted a final and approvable version which included an ERP. ADEQ publicly noticed and approved the modification on 3/3/00. The City is currently modifying the program to include recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005); the City is also currently evaluating the need for technically based local limits. The auditor appreciates the City's efforts to inform the public on issues currently impacting the POTW (Publicly Owned Treatment Works); the city has distributed pamphlets on mercury and phosphorus (see attachment D & E).

The auditor toured the City wastewater treatment plant on Monday afternoon (6/18/07). The plant consists of grit removal, primary clarification, two stage trickling filters with recirculation, intermediate clarification, de-nitrification basin, final clarification, extended aeration followed by chlorination and de-chlorination.

The POTW's average flow of 2.8 MGD consists approximately of 54% industrial (1.5 MGD) flow; most of the industrial flow comes from a single SIU (poultry processor). Currently the City has a total of 4 SIUs; the City is currently evaluating the categorical status of two SIUs which were listed as CIUs. If the two CIUs are deemed non-categorical, the City has the discretion to list them as SIUs.

Sludge handling facilities include gravity thickening, aerobic digestion and dewatering by belt filter press. The sludge is presently disposed of in a landfill. The effluent from the POTW has shown no pattern of toxicity to its receiving stream (Sager Creek) and flows from the POTW approximately 500 yards to the Arkansas/Oklahoma border; nonetheless, the city has reported "sporadic" sub-lethal failures on DMRs from biomonitoring tests.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of their industrial user files, pretreatment records and site visits to their four (4) permitted industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included in Attachments A, B, C, D and E.

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 implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of Siloam Springs' Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the City's approved program are shown below with quotes or paraphrased citations from both documents. The auditor has also provided a narrative explanation of the required actions.

1) Under 40 CFR 403.8(f)(2)(iii), "Notify Industrial Users...of...applicable requirements under...subtitles C and D of the Resource Conservation and Recovery Act."

As of 6/19/07 the City had not notified the significant industrial users (SIUs) of RCRA requirements; at least once, the City is required to notify all SIUs about RCRA requirements. A detailed explanation of these requirements is shown in 40 CFR 403.12(p) & (j). The City may include this notification in the application for permit to ensure that future SIUs are also notified.

2) Under 40 CFR 403.8(f)(1)(iii) & (B)(3) the City must "Control through permit...the contribution to the POTW by each [Significant] Industrial User to ensure compliance with...Effluent limits...based on applicable...categorical Pretreatment Standards".

During the file review the auditor noted that the city had permitted two Categorical Industrial Users; the Gates Rubber and Franklin Electric indirect discharger permits required compliance with 40 CFR 433. The city currently has deemed that Gates falls under 40 CFR 428 only but the permit refers to 40 CFR 433. During the site visit to the Franklin Electric plant, Mr. Tim Cloud claimed that the 40 CFR 433 core process (phosphating) had been removed and none of the 40 CFR 433 six core processes are present in the plant; the permit still refers to 40 CFR 433 (Attachment A-2/18). The City must verify proper categorization and (if appropriate) reissue these two permits.

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

1) Send a copy of the reporting requirements located in 40 CFR 403.12(p) & (j) to all hazardous waste generators shown on the ADEQ website at:

http://www.adeq.state.ar.us/hazwaste/rcra2/facil_sum.asp#Display

(Instructions: Enter "Siloam Springs" in the box next to the title "Location City" and click "Search" to see the list.)

These generators will realize that the City is knowledgeable about their status as a hazardous waste generator. If one of these generators causes a problem at the POTW, the problematic generator cannot claim ignorance of reporting requirements.

2) Continue to improve inspection documentation and continue to improve procedures for collecting evidence while taking samples for analysis and recording flows. The City has improved these procedures based on a review of the auditor report dated January 30, 2003.

3) Continue to improve efforts with the Mercury program. The city has made significant advances since the last auditor; see Attachment D.

4) Reduce the self monitoring frequency to the minimum of twice per year for those pollutants historically not detected at the categorical industrial users (if applicable) and reduce (or eliminate) the monitoring frequency for pollutants historically not detected at the other non-categorical SIUs. The city may perform test for these pollutants from time to time to verify that these pollutants continue to pose no threat to the POTW.

5) Include "Fact Sheets" in permits; the City had fact sheets for the old permits but did not include fact sheets in the recently issued permits.

6) Continue efforts with "paperless" record keeping.

7) Continue to assist local industries with P2 efforts.

8) Use three-ring notebook for all records which remain in "paper" form.

9) Replace the title, "Transfer", with the title, "Nontransferability" in all permits to avoid confusion; see Attachment A-14/18 paragraph 3.

10) Include language for 40 CFR 403.5 General and Specific Prohibitions in all permits. The permit language may simple reference "40 CFR 403.5 National pretreatment standards: Prohibited discharges".

**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**

- 1) The City of Siloam Springs shall, within sixty (60) days of the effective date of their next NPDES permit, (1) submit a WRITTEN CERTIFICATION that a technical evaluation has demonstrated that the existing technically based local limits (TBLL) are based on current state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment facility, worker health and safety problems, and sludge contamination, OR (2) submit a WRITTEN NOTIFICATION that a technical evaluation revising the current TBLL and draft sewer use ordinance which incorporates such revisions will be submitted within 12 months of the effective date of the City's next NPDES permit. The City may consider mitigating circumstances such as the requirements to meet Oklahoma water quality standards and may select the more stringent state requirement in the evaluation.
- 2) Comply with the most recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). The City must review the existing approved program and make all necessary modifications to comply.

The following is a summary of changes required by the Streamlining Rule; some of these changes may not be applicable to the City of Siloam Springs pretreatment program.

1. Updated removal credits provisions relating to Overflows [§ 403.7(h)]
2. Slug control requirements must be included in SIU control mechanisms [§ 403.8(f)(1)(iii)(B)(6)]
3. SIUs must be evaluated for the need for a plan or other action to control slug discharges within a year from the final rule's effective date or from becoming an SIU [§ 403.8(f)(2)(vi)]
4. Expand SNC to include additional types of Pretreatment Standards and Requirements [§ 403.8(f)(2)(viii)(A-C)]
5. SIU reports must include BMP compliance information [§ 403.12(b), (e), (h)]
6. Require periodic compliance reports to comply with sampling requirements and require non-categorical SIUs to report all monitoring results [§ 403.12(g)(3), (6)]
7. Require notifications of changed discharge to go to the Control Authority [§ 403.12(j)]

* * * * *

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

PRETREATMENT AUDIT CHECKLIST

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General InformationPages 1- 4
 Section II: Pretreatment Program AnalysisPages 5-17
 Section III: Industrial User File EvaluationPages 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: Trevor L. Bowman Title: Public Works Director

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: tmeyers@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 18-21, 07

(ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>*Tom Meyers</u>	<u>WW Supt/Pretreatment Coor</u>	<u>(479) 524-5623</u>
<u>Trevor Bowman</u>	<u>Public Works Director</u>	<u>(479) 524-5136</u>

* Program Primary Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>06/03</u>	<u>Permits w/o bypass prohibition & inspections problems</u>
<u>PCI</u>	<u>10/04</u>	<u>Wrong location for HW Meter; Chlorine testing; etc.</u>
<u>PCI</u>	<u>04/06</u>	<u>Unissued permits, no bypass prohibition, etc.</u>

YES NO

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

If yes, describe the required corrective action:

 ✓ Is the Control Authority currently in SNC or RNC?

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

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0020273	Siloam Springs	(Public Notice)	

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

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: (Public Notice)

Treatment Plant Wastewater Flow: Design- 4.4 MGD; Actual (Average)- 2.8 MGD

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

Industrial Contribution to this Treatment Plant

of SIUs : 4 # of CIUs : 2
 Industrial Flow (mgd) : 1.5 Industrial Flow (%) : 62 %

Level of Treatment

Type of Process(es):

Primary Circular Clarifiers

Secondary Trickling Filters

Tertiary Denitrification; Final Clarification; Ext. Aeration

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:

<input type="checkbox"/> Land Application	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Monofill	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Mun. Solid Waste Landfill	<u>1440</u> dry tons/yr.
<input type="checkbox"/> Public Distribution	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Lagoon Storage	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Other (specify)	<input type="checkbox"/> dry tons/yr.

List of toxic pollutant limits in NPDES permit: Copper

SECTION I: GENERAL INFORMATION

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

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

Issuing Authority: ADEQ
 Issuance Date: (NPDES Permit in Public Notice)
 Expiration Date: " " " " "

List pollutants that are specified in current sludge permit:
Permit will reference 40 CFR 503 requirements for Land Application only

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 a number of sporadic "Fails"; however, ADEQ Water Quality Planning Branch is not requiring a TRE at this time.

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u>N/A¹</u>	<u> </u>
Priority **	<u>1</u>	<u>1</u>	<u> </u>	<u> </u>
Biomonitoring	<u> </u>	<u>4</u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u>N/A¹</u>	<u> </u>
Other: <u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* As identified at 40 CFR 122, Appendix D, Table III, ** As identified at 40 CFR 122, Appendix D, Table II
¹Sludge is taken to a Cherokee Landfill in Oklahoma.

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.
Copper and Zinc are the only two parameters consistently detected in the influent
Both parameters stayed the same over the past five years.

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

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

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

YES NO
 Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

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

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

1. Modifications:

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

2. Modifications in Progress:

Date Requested	Nature of Modification
<u> </u> Pending	<u> </u> Evaluation of Local Limits
<u> </u> Pending	<u> </u> Required Streamlining Changes

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: 04/00
Date of most recent Pretreatment Program modification approval: 03/00

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 (P²) policies by contributing jurisdictions?

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

	<u>Name of Jurisdiction</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1.	<u> N/A </u>	<u> </u>	<u> </u>	<u> </u>
2.	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3.	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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 P² 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:

<u>IU Name</u>	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</u>
<u> N/A </u>	<u> </u>	<u> </u>	<u> </u>

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 P² 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)]

Siloam Springs is a small community (pop. <15,000) 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 P² activity and the distribution of P² 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?
<u>N/A</u>		

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

- a. 4 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 2 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 2 Noncategorical SIUs
- d. 0 Other regulated nonsignificant IUs (Describe) _____
- 4 TOTAL of a. + d.

YES NO

Has the POTW identified any IUs with Pollution Prevention opportunities?
 Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

If not, the Control Authority has defined "significant industrial user" to mean: CA definition is the same as EPA except "Streamlining" changes are not included.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO
 Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

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?

_____ Date Notified _____ 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
(No existing limits but in the process of developing new limits)			

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)]

	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)	_____	_____	_____	_____	_____	_____	_____

* - If necessary for the sludge disposal option chosen.

¹CA had developed local limits but they were based on Arkansas WQS; CA is developing new limits based on Oklahoma WQS.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

YES NO

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

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

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

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?

¹CA 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.

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	<u>1/yr</u>	1/year	_____
Other SIUs	<u>1/yr</u>	1/year	_____
Sampling:			
CIUs	<u>1/yr</u>	1/year	<u>Extra Compliance Assurance</u>
Other SIUs	<u>1/yr</u>	1/year	<u>" " "</u>
Reporting:			
CIUs	<u>1/mo</u>	2/year	<u>" " "</u>
Other SIUs	<u>1/mo</u>	2/year	<u>" " "</u>
Self-Monitoring:			
CIUs	<u>1/mo</u>	2/year	<u>" " "</u>
Other SIUs	<u>1/mo</u>	2/year	<u>" " "</u>

#	%	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
<u>0</u>	<u>0</u>	Not sampled at least once in the past reporting year?
<u>0</u>	<u>0</u>	Not inspected at least once in the past Pretreatment reporting year?
<u>0</u>	<u>0</u>	Not inspected 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	
___	<input checked="" type="checkbox"/>	If requested?
___	<input checked="" type="checkbox"/>	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	" "
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?

¹CA has only 4 SIUs and both 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)(vii)] {Except Streamlining changes not included yet}

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: Local Limits were not approved; ADEQ asked the City to wait until the NPDES permit was issued with either Oklahoma or Arkansas WQ stds. The NPDES permit was issued based on Oklahoma WQ stds.

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	Action Date	Return to Compliance?	
				Yes (Date)	No
(None)					

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
<input checked="" type="checkbox"/>		Interference [WENDB] _____
<input checked="" type="checkbox"/>		Pass through [WENDB] _____
<input checked="" type="checkbox"/>		Fire or explosions? _____ (incl. flash point viol.)
<input checked="" type="checkbox"/>		Corrosive structural damage? _____ (incl. pH <5.0).
<input checked="" type="checkbox"/>		Flow obstructions? _____
<input checked="" type="checkbox"/>		Excessive flow or pollutant concentrations? _____
<input checked="" type="checkbox"/>		Heat problems? _____
<input checked="" type="checkbox"/>		Interference due to oil or grease? _____
<input checked="" type="checkbox"/>		Toxic fumes? _____
<input checked="" type="checkbox"/>		Illicit dumping of hauled wastes? _____

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount
Civil	0	\$ _____
Administrative	0	\$ _____
Total	0	\$ _____

[WENDB-IUPN]

SECTION III: INDUSTRIAL USER FILE REVIEW

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: _____

¹POTW has only 4 SIUs and annual inspections & sampling are usually performed in the same week for all four.

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) _____

²POTW serves a small community and has only four 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?

Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: The POTW's receiving stream (Sager Creek) is listed on Oklahoma's 303(d) list as impaired for Nitrates; ADEQ will consider Oklahoma WQ stds when determining NPDES limits.

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:

	<u>Percent of Total Funding</u>
<input checked="" type="checkbox"/> POTW general operating fund	>60%
<input checked="" type="checkbox"/> IU permit fees	< 1%
<input checked="" type="checkbox"/> monitoring charges	9%
<input checked="" type="checkbox"/> industry surcharges	30%
<input type="checkbox"/> other (describe) _____	
Total	100%

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

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

<u>YES</u>	<u>NO</u>	<u>If no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Legal assistance _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Permitting _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	IU inspections _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample collection _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample analyses _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data analysis, review and response _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enforcement _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Administration (inc. record keeping /data management) _____

SECTION III: INDUSTRIAL USER FILE REVIEW

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>		<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	ISCO Automatic Sampler
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	SCBA, Bloodborne Pathogen Program, Lockout Tags, etc.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	Pick-Up Truck
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	Usual Lab equipment and contract'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

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 Franklin Electric File/ID No. 003
Industry Address 650 Highway 412 West P.O. Box 490
Industry Description Manufacturer of Submersible Electric Motors
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3621
Ave. Total Flow (gpd) 17,361 Ave. Process Flow (gpd)

Industry visited during audit: YES

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) 67,672 Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments:

FILE #: 3 Industry Name Simmons Industries File/ID No. 001
Industry Address N. Hico Street, P.O. Box 430
Industry Description Poultry Slaughterer/Processor & Pet Food Mfgr
Industrial Category N/A 40 CFR SIC Code: 2015
Ave. Total Flow (gpd) 1,360,000 Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments:

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) 23,900 Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments:

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

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

Comments: 1. Gates installed the regulated rubber processes in Sept 1977 after the NS date of 8/23/74; therefore, Gates is a NS and falls under 40CFR428 but permit shows 40CFR433. 2. No fact sheet and previous fact sheet is not applicable. 3. No fact sheet; CA is relying on previous fact sheet. 4. Heading shows "Transfers"; should show "Nontransferability". 5. Franklin permit has limits based on 40CFR433 but Franklin removed the core process and no longer falls under 40CFR433.

B. Control Mechanism

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Does the file contain an application for a control mechanism?	X	X	X	X	_____
If yes, what is the application date?	N/A	N/A	N/A	N/A	_____
Does it ask for Pollution Prevention information?	N/A	N/A	N/A	N/A	_____
2. Does the file contain a permit?	✓	✓	✓	✓	_____
Permit Expiration Date?	4-30-11	4-30-11	4-30-11	4-30-11	_____
Is a fact sheet included?	2	3	3	3	_____
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?	4	4	4	4	_____
d. Appropriate discharge limitations?	5	✓	✓	✓	_____
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	_____

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
g. Sampling locations?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
i. Types of samples (grab or composite) for self-monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Civil and Criminal Penalty provisions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Revocation of permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
l. Compliance schedules/ progress reports	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
m. General/Specific Prohibitions?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u> </u>
n. Where technologically and economically achievable, are p ² aspect included?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u> </u>

Comments: 1. Reference number "(1)" on limits page does not match outfall location number. 2. Franklin permit shows limits for 40CFR433 but IU falls under 40CFR464 only; the 40CFR464 processes are presently "zero discharge". 3. Gates permit shows 40CFR433 but IU falls under 40CFR428. 4. POTW presently does not have local limits.

C. Application of Standards

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Has the IU been properly categorized?	<u>2</u>	<u>3</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u> </u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
Comments: (None for this page)					

D. Compliance Monitoring

Sampling

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

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> </u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> </u>

Comments: 1. Form specifies "Name/Title" but CA does not also show title.
 2. None of the IUs have pretreatment systems except Simmons; Simmons has DAF.

Inspections

7. Does the IU file contain inspection reports?	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> </u>
b. Date of last Inspection	<u>5-18-07</u>	<u>5-21-07</u>	<u>5-22-07</u>	<u>5-22-07</u>	<u> </u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> </u>
b. Inspection date and time?	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> </u>
c. Name and title of IU official contacted?	<u> 1 </u>	<u> 1 </u>	<u> 1 </u>	<u> 1 </u>	<u> </u>
d. Verification of production rates?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> ✓ </u>	<u> </u>
f. Evaluation of pretreatment facilities?	<u> 2 </u>	<u> 2 </u>	<u> 2 </u>	<u> 2 </u>	<u> </u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
i. Manufacturing facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
j. Chemical handling and storage procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
k. Chemical spill prevention areas?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
l. Hazardous waste storage areas and handling procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
m. Sampling procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
n. Laboratory procedures?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u> </u>
o. Monitoring records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
p. Evaluation of Pollution Prevention opportunities?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u> </u>
q. Control Authority inspector signature?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>

Comments: (None for this page)

IU Self-Monitoring and Reporting

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
11. Does the file include:					
a. BMR?	<u>✓</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
b. 90-Day Report?	<u>✓</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
c. All periodic reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Compliance schedule reports?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
12. Did the IU report on all required parameters?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
13. Did the IU comply with the required sampling frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
14. Did the IU report flow?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
15. Did the IU comply with the required reporting frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
b. Did POTW respond to the spill?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>

Comments: (None for this page)

SECTION III: INDUSTRIAL USER FILE REVIEW

E. Enforcement

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
b. IU self-monitoring results?	<u>✓</u>	<u>N/A</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>1</u>	<u>0</u>	<u>4</u>	<u>1</u>	<u> </u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>✓</u>	<u>N/A</u>	<u>✓</u>	<u>X</u>	<u> </u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>✓</u>	<u>N/A</u>	<u>✓</u>	<u>✓</u>	<u> </u>
5. Were all nondischarge violations identified in the file?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
6. Was the IU notified of all violations?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
8. Did the Control Authority follow its approved ERP?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
10. Is there a compliance schedule? If yes:	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u> </u>
11. Were there any compliance schedule violations?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>

SECTION III: INDUSTRIAL USER FILE REVIEW

Enforcement (continued)

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
b. TRC	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
c. Pass through/Interference	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
d. Spill/slug loads	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
e. Reporting	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
f. Compliance schedule	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
g. others (specify)	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
13. Was the SIU published for SNC?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>
Date of publication.	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u> </u>

Comments: 1. IUs had no late reports or continued violations; therefore, SNC was not evaluated because of sporadic violations.

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 19-21, 2007 Date entered into QNCR: _____
(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.



United States Environmental Protection Agency
Washington, D. C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code 1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/>	NPDES 3 AR 0020273	yr/mo/day 11 12 07 06 19	Inspection Type 18 9	Inspector 19 5	Fac Type 20 1
Remarks SILOAM SPRINGS PRETREATMENT PROGRAM					
Reserved 67 <input type="checkbox"/> 69 <input type="checkbox"/>	Facility Evaluation Rating 70 <input type="checkbox"/>	BI 71 <input type="checkbox"/>	QA 72 <input type="checkbox"/>	Reserved 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> 80 <input type="checkbox"/>	

Transaction Code 1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/>	NPDES 3 AR 0020273	yr/mo/day 11 12 07 06 20	Inspection Type 18 U	Inspector 19 5	Fac Type 20 2
Remarks 04 SIU SITE VISITS					
Reserved 67 <input type="checkbox"/> 69 <input type="checkbox"/>	Facility Evaluation Rating 70 <input type="checkbox"/>	BI 71 <input type="checkbox"/>	QA 72 <input type="checkbox"/>	Reserved 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> 80 <input type="checkbox"/>	

Section B: Facility Data

Name and Location of Facility Inspected City of Siloam Springs POTW P.P. P O Box 80 Siloam Springs, AR 72761	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 8:30 6/19/07	Permit Effective Date 4/1/02
	Exit Time/Date 11:00 am 6/21/07	Permit Expiration Date 3/31/07

CODE SHEET

Pretreatment Audit

Auditor's Name	<u>Torrence</u>	CODE
Permit Number	<u>AR 0020273</u>	
Audit Date	<u>6/19 - 6/21/07</u>	DTIA
Date Permit Modified to require pretreatment	<u>8/22/84</u>	PTIM

PPETS WENDR DATA ELEMENTS

Significant IUs without Control Mechanisms	<u>0</u>	NOCM
Number of Significant IUs	<u>4</u>	SIUS
Number of Categorical IIIs	<u>2</u>	CIUS
Technical Evaluation for Local Limits	<u>Y</u>	EVLL
Adoption of Technically-Based Local Limits	<u>N</u>	ADLL
Significant IUs not inspected or sampled	<u>0</u>	NOIN*
Significant IUs in significant noncompliance with standards or reporting	<u>0</u>	PSNC*
Significant IUs in significant noncompliance with self-monitoring	<u>0</u>	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	<u>0</u>	SNIN*

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Siloam Springs NPDES #: AR0020273

Name, address and phone number of industry:
Cobb-Vantress, P.O. Box 1030, 4703 U.S. Highway 412 East
(479) 549-2826

Type of industry: Egg Hatchery Date/Time of visit: 6/20/07 @ 8:30 am
(Include regulatory citation if CIU)

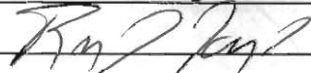
Industry contacts: Dan Cole, Sr. Area Environmental Manager

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

Noted comments: 1. Hazardous Waste Stored Outside in isolated building.

Additional Comments: Cobb emailed the city a "conditional entry" form for the auditor to sign; the form reserved Cobb's right to deny or restrict entry. Cobb did not ask the auditor to present the form prior to entry into the facility.

Visit conducted by: Torrence/Meyers Date: 6-20-07



(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 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: Torrence/Meyers Date: 6/20/2007


(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: 6/20/2007 @ 10:45 am
(Include regulatory citation if CIU)

Industry contacts: Joe Earney, Director of Env Quality

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

Noted comments: 1. The auditor visited a similar plant in another pretreatment city. The similar plant's pretreatment system had two DAF units; each unit was capable of handling maximum flows and the operator alternated days between the two units. Simmons has two DAF units which must run in parallel to handle the maximum flow. The auditor emphasized the need for a third unit; if one of the existing units failed then Simmons may have to halt poultry production while the faulty unit is repaired.

Visit conducted by: Torrence/Meyers Date: 6/20/2007



(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:

The "old" facility is a kill plant where chickens are hanged on a overhead conveyor where they are literally "shocked and killed". The blood is drained; the feathers are removed and the chickens are cut into parts. Wastewater is generated by washing chicken parts, equipment and floors and flows to the pretreatment system. 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.

The new facility is a pet food plant where chicken leftover parts from the old and debone facilities are mixed with pork and beef by products; the parts are ground into a soft mesh and canned. The canned meat is cooked in batch tanks filled with hot water. The batch tanks are periodically released to the pretreatment system. All three facilities share the truck maintenance and wash sheds; wastewater from the truck wash is periodically sampled, is released directly to the POTW and bypasses the pretreatment system. The auditor inquired why the truck wastewater was not sent to the pretreatment system; Mr. Earney pleaded "prohibitive cost".

Visit conducted by: Torrence/Meyers Date: 6-20-07



(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:
Franklin Electric; Hwy 412 West; (479) 524-9331

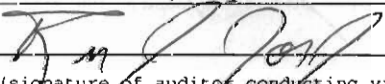
Type of industry: Motor Mgr Date/Time of visit: 6/20/2007 @ 1:30 pm
(Include regulatory citation if CIU)
40CFR464 Aluminum Die Caster?

Industry contacts: Tim Cloud

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

Noted comments: 1. The CA has Franklin permitted as a CIU regulated by 40CFR433. During the site visited Mr. Cloud claimed that the core process (phosphating) had been removed from the facility and none of the six core processes of 40CFR433 are in the plant; therefore, 40CFR433 no longer applies to this facility. However, 40CFR464 appears to apply to this facility but the Aluminum Die Cast operation does not produce any wastewater. The CA may elect to permit Franklin as a SIU with a "zero discharge" provision for the 40CFR464 processes or the CA may elect to declare that Franklin is not an SIU.

Visit conducted by: Torrence/Meyers Date: 6-20-07



(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Siloam Springs NPDES #: AR0020273

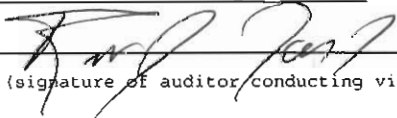
Industry name: Franklin Electric

Additional comments: Franklin buys aluminum billets, melts the billets and employs a die cast machine to pour molten aluminum into motor stators. The cast aluminum is an integral part of the motor. No wastewater is generated at the die casting site.

Mr. Cloud claimed that the only process wastewater generated came from the pressure test tanks; this wastewater does not appear to fall under any of the 40CFR464 subcategories: (a) Casting Cleaning (b) Casting Quench (c) Die Casting (d) Dust Collection Scrubber (e) Grinding Scrubber (f) Investment Casting (g) Melting Furnace Scrubber (h) Mold Cooling.

Franklin buys iron sheets rolled into coils; flat parts are punched from the sheets which form the stator. The stators are filled with molten aluminum and wound with copper wire. Franklin buys stainless sheets which form the exterior of the motors. The stainless stain exterior does not require phosphating and painting.

Visit conducted by: Torrence/Meyers Date: 6-20-07


(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

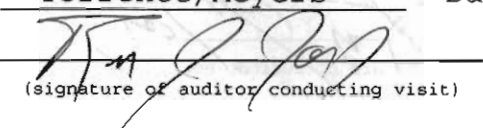
Type of industry: Rubber Belts Date/Time of visit: 6/20/07 @ 3:30 pm
(include regulatory citation if CIU)

Industry contacts: Bill Medley, Total Compliance Consultant, Inc

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

Noted comments: 1. The City is currently considering the status of this industry as a SIU and may decide that Gates is not an SIU and, hence, does not require a permit or yearly inspections.

Visit conducted by: Torrence/Meyers Date: 6-20-07


(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.

Since most of the wastewater is non-contact cooling water, the City may elect to deem that Gates is not a significant industrial user pending a revised determination; the City must determine if Gates is an "existing source". 40 CFR 428 does not have pretreatment standards for existing sources.

Visit conducted by: Torrence/Meyers Date: 6-20-07


(signature of auditor conducting visit)

CITY OF SILOAM SPRINGS

PO BOX 80

SILOAM SPRINGS, ARKANSAS 72761-0080

WASTEWATER DISCHARGE PERMIT

Company Name Franklin Electric
Division (if applicable) _____
Mailing Address P.O. Box 490
Siloam Springs, Arkansas 72761
Facility Address US Highway 412 West
Siloam Springs, Arkansas 72761
Permit Number 003

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 Franklin Electric, classified by SIC No. 3621 for the contribution of industrial wastewater into the City of Siloam Springs sewer lines at the plant site at US Highway 412 West.

This permit is granted in accordance with the application filed on December 16, 2005 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 1, 2006

Expiration Date: April 30, 2011

Name _____

5/16/06

City Administrator David Cameron

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PART I. SPECIFIC CONDITIONS

SECTION A - DISCHARGE LIMITATIONS

FRANKLIN ELECTRIC:

<u>Pollutant</u>	<u>Daily Maximum (mg/l)</u>	<u>Maximum Monthly Average (mg/l)</u>
Oil and Grease	100 mg/l	100 mg/l
PH	Between 6.0 - 9.0	
Total Suspended Solids	1000 mg/l	750 mg/l
BOD	1000 mg/l	750 mg/l
Copper (T)	0.91 mg/l	0.56 mg/l
Cadmium	0.13 mg/l	0.05 mg/l
Cyanide (T)	0.23 mg/l	0.12 mg/l
Chromium (T)	0.53 mg/l	0.33 mg/l
Lead (T)	0.25 mg/l	0.16 mg/l
Nickel (T)	0.77 mg/l	0.46 mg/l
Silver (T)	0.08 mg/l	0.05 mg/l
Zinc (T)	0.94 mg/l	0.53 mg/l
(T) Toxic Organics	0.53 mg/l	0.53 mg/l
Phosphorus (T)	Report only mg/l	Report only mg/l
Mercury (T)	Report only mg/l	Report only mg/l
Arsenic (T)	Report only mg/l	Report only mg/l
Ammonia (NH3)	Report only mg/l	Report only mg/l
Nitrate (NO3)	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 433 - Metal Finishing) limits, except for the conventional pollutants (Total Suspended Solids and Oil and Grease). These limits (except TTS, 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

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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

<u>Pollutant</u>	<u>Location</u>	<u>Frequency</u>	<u>Sample Type</u>
Flow*	(1)	Daily	Record on Log (Daily)
TSS	(1)	Quarterly	24 hr. flow proportioned
BOD	(1)	Quarterly	24 hr. flow proportioned
PH	(1)	Quarterly	Grab
Total Copper	(1)	Monthly	24 hr flow proportioned
Total Cadmium	(1)	Monthly	24 hr flow proportioned
Total Cyanide	(1)	Monthly	Grab
Total Chromium	(1)	Monthly	24 hr flow proportioned
Total Lead	(1)	Monthly	24 hr flow proportioned
Total Nickel	(1)	Monthly	24 hr flow proportioned
Total Silver	(1)	Monthly	24 hr flow proportioned
Total Zinc	(1)	Monthly	24 hr flow proportioned
Total Toxic Organics	(1)	Annually	As required by 40 CFR 136
Total Phosphorus	(1)	Semi-Annual	24 hr flow proportioned
Total Mercury	(1)	Semi-Annual	24 hr flow proportioned
Total Arsenic	(1)	Semi-Annual	24 hr flow proportioned
Ammonia (NH ₃)	(1)	Semi-Annual	24 hr flow proportioned
Nitrate (NO ₃)	(1)	Semi-Annual	24 hr flow proportioned

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- A. 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;
- B. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- C. A change in any conditions that requires either a temporary or permanent reduction or elimination of the authorized discharge; or
- D. 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
- E. 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.
- F. Failure of the permittee to comply with the provisions of Section III Ordinance 00-11 (Fees) as required by condition II A. 10 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.

4. 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.

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5. 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 cause of action, including private causes of action.

6. 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.

7. 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.

8. 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 B - OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. 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

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No. 00-11. 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.

2. Need to Halt or Reduce Not a Defense

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

3. 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:

- A. Biological upset of the plant.
- B. Pollutant loadings to the plant causing pass through to the receiving stream.
- C. Pollutant loadings which interfere with normal sludge disposal.
- D. Any discharge which directly or indirectly causes the plant to violate its NPDES permit.

4. Bypass of Treatment Facilities

- A. 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

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B. Notice

- (1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.
- (2) Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Part II D.6 (24 hour notice).

C. Prohibition of bypass

- (1) Bypass is prohibited and the City may take enforcement action against a permittee for bypass, unless:
 - (a) 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);
 - (b) 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
 - (c) The permittee submitted notices as required by Part II B.4.b.

5. 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 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.

6. 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

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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 authorized the generation, treatment, transport, or disposal of any materials removed during pretreatment.

7. 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 C - MONITORING AND RECORDS

1. 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 thereunder.

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2. 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 the approval of the City.

3. Automatic Resampling

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

- A. Inform the City of Siloam Springs of the violation within 24 hours; and
- B. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 30 days of the first violation.

4. 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. "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).
- B. "Water Measurement Manual", U.S. Department of Interior, Bureau of Reclamation. Second Edition, Revised Reprint, 1974, 327 pp. (Available from the

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U.S. Government Printing Office, Washington, D.C. 20402. Order by Catalog No.127.19/2:w29/2, Stock No. S/N 24003-0027).

- C. "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).
- D. "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).

5. 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.

6. 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

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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.

7. 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. 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:

City Administrator
PO Box 80
Siloam Springs, AR 72761-0080

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

8. 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.

9. Special Monitoring Requirements

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

- A. One time monitoring for specific pollutants to verify their presence.
- B. Acute or chronic biomonitoring to determine the toxicity of the industrial users discharge.
- C. Development of sludge disposal plans, slug loading control plans, or other industrial user management plans that might be required by the control authority.
- D. In response to noncompliance, additional monitoring of regulated and nonregulated pollutants may be necessary.

10. 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, 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.

11. 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:

- A. The date, exact place, time and methods of sampling or measurements;
- B. The individual(s) who performed the sampling or measurements;
- C. The date(s) analyses were performed;
- D. The individual(s) who performed the analyses;
- E. The analytical techniques or methods used; and
- F. The measurements and results of such analyses;
- G. Any additional information the City deems necessary.

12. Inspection and Entry

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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:

- A. 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;
- B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- C. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- D. 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.

SECTION D - REPORTING REQUIREMENTS

1. 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.

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2. 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.

3. 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.

4. Monitoring Reports

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

5. 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.

6. 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

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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:

- A. Any unanticipated bypass which exceeds any effluent limitation in the permit;
- B. Any upset which exceeds any effluent limitation in the permit; and
- C. Violation of a maximum daily discharge limitation for any of the pollutants listed by the City in Part I of the permit.
- D. Any act or event which may endanger public health or adversely affect the wastewater treatment facility.

7. 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.

8. Changes in Discharge of Toxic Substances

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

- A. 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).
- B. 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).

9. Duty to Provide Information

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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.

10. 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.

11. Satisfactory Requirements

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

A. All permit applications shall be signed as follows:

- (1) For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means:
 - (a) 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
 - (b) The manager of one or more manufacturing, production, or operating facilities employing more than 50 persons or having gross annual sales or expenditures exceeding \$5 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (2) For a partnership or sole proprietorship; by a general partner or the proprietor, respectively.

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- B. 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 duly authorized representative only if:
- (1) The authorization is made in writing by a person described above.
 - (2) 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
 - (3) The written authorization is submitted to the City.
- C. 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."

12. 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.

13. Penalties for Falsification of Reports

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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.

PART III. INDUSTRIAL COMPLIANCE PLAN

NOT USED

City of Siloam Springs
Industrial Pretreatment Program Inspection Report

Date: 5/18/07

Reported By: Tom Myers

A. Facility Description

Name Franklin Electric Contact Name Tim Cloud

Location Address Hwy 412

Mailing Address _____

Principal Product/Service Motor assembly

Permit _____ SIC Code(s) _____

Categorical Significant Noncategorical _____ Undetermined _____

Operation Schedule: Hours/Day 24 Days/Week 5 Weeks/Year 50

Scheduled Plant Shutdown Periods June 11-15 Dec 17-21

Plant Activities During Shutdowns Maintenance

Employees Per Shift: 1st _____ 2nd _____ 3rd _____

*down
S. 1207*

B. Inspection Description

Entry Time 1345 Exit Time _____

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
<u>Tim Cloud</u>	<u>Franklin Electric</u>	<u>479-524-9331</u>
_____	_____	_____
_____	_____	_____

E. Sample Location(s) Each

Sample Location No. 1 Verified During Inspection? Yes No
Sample Location Description North East Corner of Building on North West corner of
Estimated Volume/Description of:
Regulated Flow 47,000 gpd
Unregulated Flow 0
Dilutional Flow 0

Self Monitoring Methods:

Flow Measurement Approved?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Verified During Inspection?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Flow Meter Calibrated?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Reviewed Records?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Collection Methods Approved?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Verified During Inspection?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Comments:

ESC from Springdale Conducts testing

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 ESC

Analysis performed by: Industry _____ Contract Lab ESC

Industry personnel responsible for sampling and/or analysis trained to do so?
 Yes No

By whom? _____

Name/Address of contract lab(s) ESC
167 Century Ave Springdale, AR 70762

Records kept of dates, times, locations, methods and names of persons taking samples?
 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 temperature of 4° C or below, but not freezing?
 Yes No Verified during Inspection? Yes No

H. Residuals Management

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

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. _____

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.

*Safety Clean — Disposal every two weeks
Waste Oil goes to Chicago for processing*

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. _____

N. Follow-Up

Date of next inspection October 2007

Other notes or comments on inspection:

Tim has done a fine job to control or eliminate

Corrective action to be taken:

None

Inspector Tommy Myers

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"APPLICATION"

INDUSTRIAL WASTE DISCHARGE QUESTIONNAIRE SILOAM SPRINGS, ARKANSAS

I. COMPANY INFORMATION

Company Name Franklin Electric Manufacturing Inc.
Mailing Address P.O. Box 490
Siloam Springs, AR. 72761
Street Address 650 Hwy. 412 West
Siloam Springs, AR. 72761
Authorized Official Jim Heilner
Title Plant Manager
Address same
Telephone Number (479) 524-9331 Ext 4259
Contact Representative Tim Cloud
Title Plant Engineer
Address same
Telephone Number (479)-524-9331 Ext 4274

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.

Date

1/6/2006

Signature of Authorized Official

Jim W. Heilner

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II. GENERAL INFORMATION

Type of Business Motor Manufacturing

Production Description (attach additional sheet if necessary)

3 shifts 5 days per week. For the production of submersible electric motors.

III. OPERATIONAL CHARACTERISTICS

Production Shifts

Hours of Operation _____ to _____ or M-F, 24/5 Continuous

Number of shifts per day 3

Employees per shift 1st 301 2nd 215 3rd 70 Time

shift begins 1st 7:00 AM 2nd 3:00 pm 3rd 11:00 pm - 7:00 AM Time shift

ends 1st 3:30 PM 2nd 11:30 pm 3rd _____ Work days

1st _____ 2nd _____ 3rd _____

Raw materials and process additives used

Steel, Copper, Aluminium, stainless steel,

Type of production processes:

Batch

Continuous

Both 50 % Batch 50 % Continuous

80 Average number of batches per day

Are there scheduled facility shutdowns? Yes No

If so, when? 1 week August and two weeks in December

Seasonal Production:

Is production subject to seasonal variations? _____ Yes No

If yes, briefly describe seasonal production cycle _____

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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.

Is an Accidental Spill Prevention Plan prepared for the facility:

Yes No

If yes, attach a copy of the Spill Prevention Plan.

How are spills (chemicals, food wastes, etc.) disposed of?

Washed into sewer

Hauled off premises

Other (describe) _____

IV. WATER CONSUMPTION AND LOSSES

Is there any wastewater generated within your facility other than normal domestic sewage? Yes No

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.

Water Consumption:

<input checked="" type="checkbox"/>	(a.) Sanitary	<u>14,000</u>	Avg Gal/Day
<input checked="" type="checkbox"/>	(b.) Cooling Water, non contact	<u>3,000</u>	Avg Gal/Day
<input type="checkbox"/>	(c.) Cooling Water, contact	_____	Avg Gal/Day
<input type="checkbox"/>	(d.) Boiler/Tower Blowdown	_____	Avg Gal/Day
<input checked="" type="checkbox"/>	(e.) Production Processes	<u>5,000</u>	Avg Gal/Day
<input checked="" type="checkbox"/>	(f.) Contained in Product	<u>500</u>	Avg Gal/Day
<input checked="" type="checkbox"/>	(g.) Other (describe) <u>Contents of mop water</u>	<u>800</u>	Avg Gal/Day
	(h.) Total	<u>23,300</u>	Avg. Total

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Water Losses:

<input checked="" type="checkbox"/>	(a.) Sanitary Sewer	17,000	Avg Gal/Day
<input type="checkbox"/>	(b.) Storm Sewer		Avg Gal/Day
<input type="checkbox"/>	(c.) Surface Water		Avg Gal/Day
<input checked="" type="checkbox"/>	(d.) Waste Hauler	100	Avg Gal/Day
<input checked="" type="checkbox"/>	(e.) Evaporation	4,100	Avg Gal/Day
<input type="checkbox"/>	(f.) Other (describe) _____		Avg Gal/Day
	(g.) Total		Avg Gal/Day

Name and Address of Waste Hauler, if used:

Rineco - P.O. Box 729, Benton, AR, 72018
Safety Kleen - 116319 E. Marshall, Tulsa, OK, 74116
Waste Management - 4041 North 141st, East Av. Tulsa, OK, 74116

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. Cooling Tower (3) Algaecides
2. Pressure Tanks (15) Motor Testing

Type of Discharge:

Is discharge to Sanitary Sewer? Intermittent Steady

If intermittent, describe (holding tanks, sump pump, batch discharge, etc.):

Etching, Parts Washer and Phosphating are now
evaporated or are no longer in the production
process.

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:

<input type="checkbox"/>	Acids and Alkalies	_____	Gal or lbs/Yr
<input type="checkbox"/>	Heavy Metal Sludges	_____	Gal or lbs/Yr
<input type="checkbox"/>	Inks/Dyes	_____	Gal or lbs/Yr
<input checked="" type="checkbox"/>	Oil and/or Grease	<u>20,000</u>	Gal or lbs/Yr
<input type="checkbox"/>	Organic Compounds	_____	Gal or lbs/Yr
<input type="checkbox"/>	Paints	_____	Gal or lbs/Yr
<input type="checkbox"/>	Pesticides	_____	Gal or lbs/Yr
<input type="checkbox"/>	Plating Wastes	_____	Gal or lbs/Yr
<input type="checkbox"/>	Pretreatment Sludges	_____	Gal or lbs/Yr
<input type="checkbox"/>	Solvents/Thinners	_____	Gal or lbs/Yr
<input checked="" type="checkbox"/>	Other Hazardous Wastes (specify)	_____	Gal or lbs/Yr
	<u>Alcohol, Mineral Spirits and</u>	<u>35,000</u>	Gal or lbs/Yr
	<u>Vinyl Toluene</u>	_____	Gal or lbs/Yr
<input type="checkbox"/>	Other Wastes (specify)	_____	Gal or lbs/Yr
	_____	_____	Gal or lbs/Yr
	_____	_____	Gal or lbs/Yr

For the above checked wastes, does your facility practice:

- | | |
|---|--|
| <input checked="" type="checkbox"/> On-site storage | <input type="checkbox"/> On-site disposal |
| <input type="checkbox"/> Off-site storage | <input type="checkbox"/> Off-site disposal |

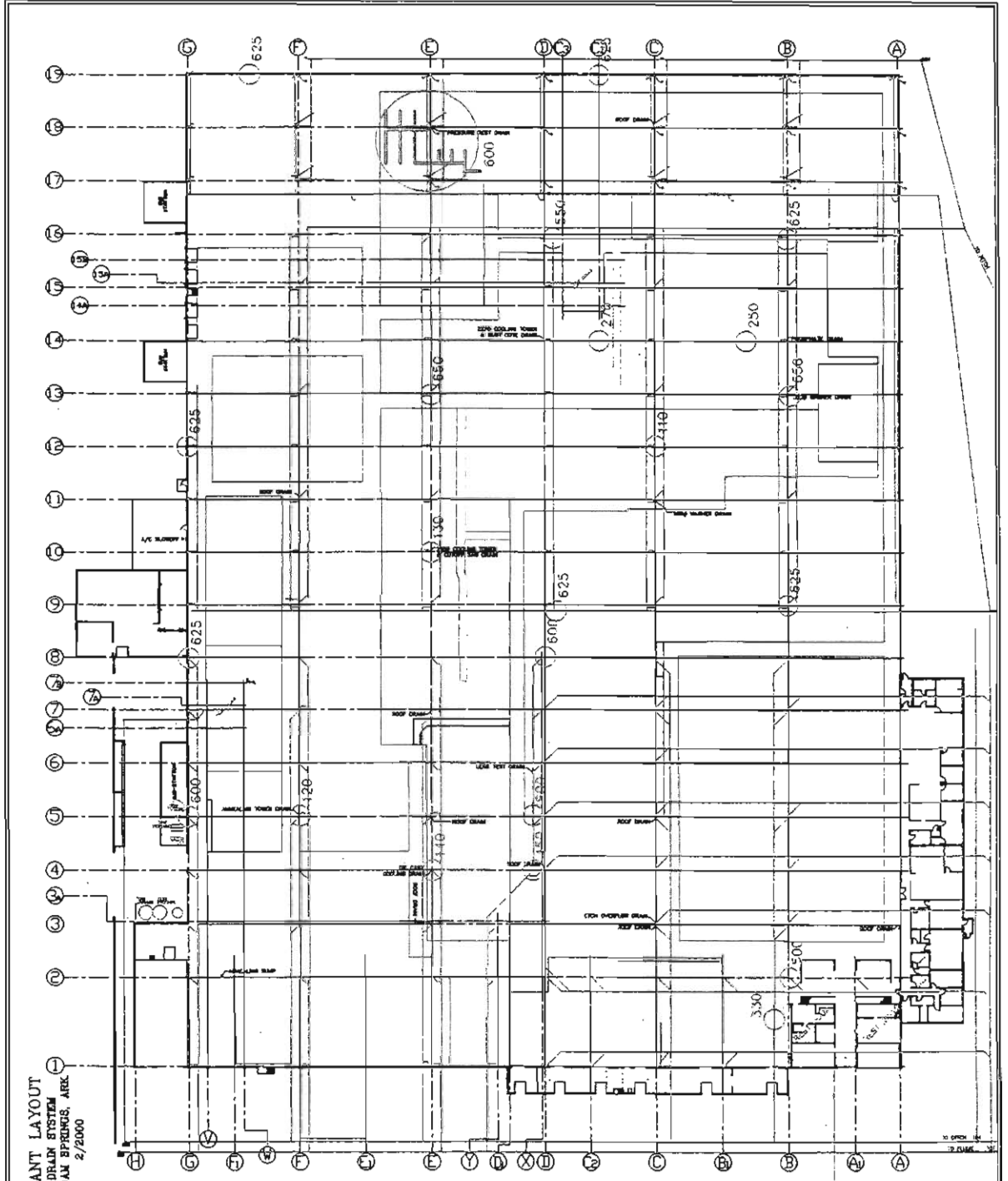
Briefly describe the method(s) of storage or disposal checked above:

Dedicated building for the storage of
hazardous materials. All hazardous materials is
shipped off site every 90 days.

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.

C-6/6

PLANT LAYOUT
DRAIN SYSTEM
D.O.M. SPRINGS, ARK.
2/2000



Flow Processes
120 Cooling Tower by Tool Crib
130 2500 Cooling Tower
140 Die Cast Cooling Tower
150 Pressure Test
330 Life Test
450 Cooling Water for Welders
500 Front Breakroom
550 Back Breakroom
600 Sprinkler Systems
625 Water Fountains
650 Eye Wash Stations

Evaporation
110 Hot Drop
250 Phosphating
270 Rust Prevent for Steel Parts

MERCURY CONCERN

MERCURY AWARENESS FOR SILOAM SPRINGS CITIZENS

protect the environment and reduce your potential exposure to mercury. There has already been a significant reduction of mercury from certain industrial sources and in products such as batteries, but despite these efforts numerous uses of mercury still exist. This brochure will help you identify sources of mercury, products containing mercury and learn how to find safe, cost-effective ways to prevent mercury pollution.

What is Mercury?

Mercury is a naturally occurring toxic trace element found in air, water, soil and rocks. Mercury, a silvery colored liquid, is a member of a group of elements called heavy metals. It is also used in thousands of household and commercial products and industrial processes. Mercury can be converted in the environment by microorganisms into the organic form, methylmercury, which is especially toxic.

Why Should I Be Concerned?

- Mercury is toxic to the nervous system. Humans can be exposed to mercury in occupational, accidental or environmental settings. The primary environmental route of exposure to methylmercury is from eating contaminated fish.
- The unborn children are most at risk to methylmercury poisoning.

Mercury has been recognized as one of the primary pollutants of concern for Arkansas. Even a very small amount of mercury in the environment can be converted to a form that builds up in the muscle tissue of fish and may ultimately reach your dinner table. Most of the mercury in the lakes and rivers was deposited through the atmosphere by rain, snow or dirt particles. Mercury poisoning can cause central nervous system, kidney and liver damage in humans, and impaired child development

Working together, however, there are many things you can do to help

- Occupational and accidental exposure often results from inhaling elemental mercury vapors. This short-term (high - mercury concentration) exposure can result in nausea, shortness of breath, pneumonitis and bronchitis.
- Exposure at extreme levels of mercury can result in shakiness, tremors, numbness in the fingers and toes, loss of muscle control, memory loss and kidney disease in children and adults.
- Children playing with mercury can be seriously poisoned by breathing invisible vapors released to the air even at room temperature from mercury spilled in carpeting, furniture or other surfaces. Children are most sensitive to mercury poisoning during early development to age six.

Human Related Activities That Can Release Mercury Into The Environment

While emissions of mercury can occur from both natural and man-made sources, man-made sources are estimated to account for the majority of all emissions. Some natural mercury emissions will always occur from the soil or forest fires and are not the focus of mercury reduction

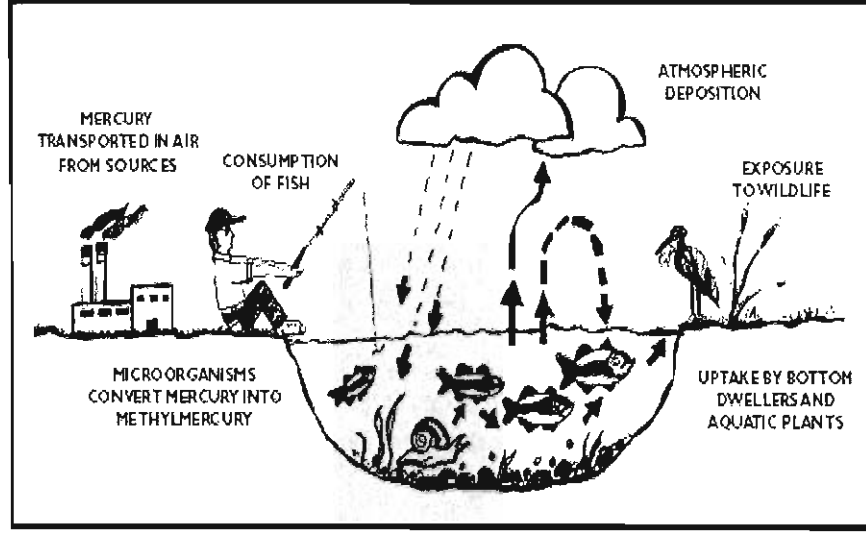
efforts. The following represent sources of mercury to the environment that can be controlled.

- Cement & lime kilns
- Coal and oil burning
- Copper smelting
- Crematories
- Dental amalgam preparation/disposal
- Dwelling demolition (thermostats & switches)
- Electrical product manufacturing & disposal (switches, fluorescent lights, some headlights & batteries)
- Evaporation of mercury from landfills
- Garbage incinerators
- Hazardous waste incinerators
- Industrial wastewater discharge
- Laboratories use and waste
- Medical waste incinerators
- Petroleum refining
- Residential boilers
- Wastewater treatment plants & sewage
- Wood burning

What Can I Do To Help?

- Buy alternative products that do not contain the following ingredients: thimerosal, phenylmercuric acetate, mercuric oxide, etc).

- Choose alternatives to mercury-containing products including mercury-free batteries, thermometers with colored alcohol or digital thermometers, etc.
- Separate mercury-containing waste from your trash and save it for local household hazardous waste collection days.
- Take mercury-containing items such as thermometers to a household hazardous waste collection facility.
- Recycle button batteries
- Conserve electricity. Burning less coal and oil (that naturally contains mercury) for electricity will emit less mercury into the environment.
- You can help! All of us have a role to play in reducing mercury emissions. You would be surprised what a difference your individual actions can make!



ALTERNATIVES

Red Bulb (Alcohol) Thermometers or Digital thermometers, Electric models, Mercury-free Button Batteries (Zinc air type), Ask your dentist, Mercury Free Toys, New latex paints, Mercury-free shoes, Mechanical or electrical switches, Mercury-free solution, Energy efficient fluorescent lights (These lights still contain mercury, however, energy will be conserved thereby reducing mercury emissions from coal & oil combustion)

DISCARDS KNOWN TO CONTAIN MERCURY

Thermometers, Thermometers (Non-Electric models), Button Batteries, Silver amalgam waste*, Quick Silver Maze Toy, Old latex paint prior to 1990, Some shoes that light up * (LA Gear's My Lil' Lights if bought before June 1994, Switches (Some light and appliance switches), Contact lens solution containing thimerosal*, Lights (Fluorescent, high intensity discharge and mercury vapor lamps)

(*Note: The primary concern is the disposal and not the exposure to mercury. No studies have confirmed any health risk associated with the identified mercury applications.)

D-2/2

Phosphorus content in detergents

Palmolive Tablets	8.7%
Electra-Sol Tablets	8.7%
Sunlight Tablets	8.7%
Cascade Complete Tablets	8.7%
Cascade Complete Powder	7.7%
Spot-Free (Wal-Mart) Powder	7.0%
Cascade Complete Gel	6.5%
Electra-Sol Powder	6.1%
All	5.1%
Electra-Sol Gel	4.9%
Sunlight Powder	4.5%
Cascade Pure Rinse	4.4%
Sunlight Gel	4.3%
Cascade Complete (Liquid)	4.0%
Palmolive Gel	1.6%

Phosphorus Free Detergents

Basic D Dishwashing Concentrate (Shaklee)	0%
Bi-O-Kleen	0%
Earth Friendly Wave	0%
Ecover	0%
Enviro-Links	0%
Life Tree	0%
President's Choice	0%
Seventh Generation	0%
Ultra Citra-Dish	0%

All information listed above can be found at:

<http://www.assabriver.org/nutrient/detergents.html>

http://www.kokagn.com/Green_Market/AutoDishwasher.html

http://www.mspartnership.org/protectourwater/pow_getinvolved.asp?inv_id=12

What can I do to help reduce phosphorus?

Best Management practice (BMP) is the key concept when working toward eliminating excessive phosphorus.

AT HOME:

- * Minimize the use of cleaning products that contain phosphorus.
- * Keep grass clippings on your lawn and away from your street. Clippings are an ideal food source for your lawn.
- * Compost green waste and use as fertilizer.
- * Use a low phosphorus fertilizer (indicated by middle number of the three number series on the bag: ex. 12-6-12 would mean 6% phosphorus content.) Fertilize properly and only in appropriate areas.
- * Have your soil tested to prevent fertilizer overuse.
- * Keep soils covered with vegetation.
- * Keep fertilizer out of storm drains and ditches.
- * Mow high. Try to keep your grass around 3 inches.
- * Water sparingly. This helps control phosphorus and keeps your bills down.
- * Landscape: Use trees, shrubs and flowers to landscape.
- * Use native and adapted plants that have lower fertilizer needs.
- * Avoid fertilizer use before a heavy rain.
- * Have your septic system pumped regularly. 1-3 years is ideal or whenever it exceeds 1/3 of the tank capacity.
- * Wash cars on the lawn and not on street.
- * Read labels on the back of detergents and use detergents with the lowest levels of phosphorus or preferably phosphate free.
- * In automatic dishwashers, use only the amount of detergent called for.
- * Only run the dishwasher when you have a full load.
- * Only run the washing machine when you have a full load.
- * Educate yourself and your children about the importance of clean waters.

AT THE LAKE:

- * Don't bathe, shampoo, or wash the boat with phosphorus containing detergents.
- * Don't burn brush or leaves near the lake shore because rainfall could wash them into the lake.
- * Keep animals and manure away from lake.
- * Don't feed ducks or other aquatic organism's because the nutrients in the feed will be added back to the lake in the organism's feces.



- * Don't use powerful outboard motors in shallow areas.

Phosphorus Information



Protecting Arkansas lakes, rivers and streams.



City of Siloam Springs
400 N. Broadway
P.O Box 80

Siloam Springs, AR 72761

Phone: (479)524-5136

Fax: (479)238-0997

Website: www.siloamsprings.com

What is all this talk about phosphorus

Dear Resident:

For several years, you have probably noticed in the paper, watched on the six o'clock news, or overheard conversations at the coffee shop: discussions regarding phosphorus levels in the Illinois River.

Research has determined that levels of Phosphorus entering the Illinois River through various water bodies, including Sager Creek have levels of nutrients, which promote the growth of algae.

Phosphorus is a natural and necessary element. It is found in soil, rocks, and our bodies. It is also found in many of the foods we eat such as dairy products, meat, poultry and fish. It's a common ingredient in fertilizers because it is an essential nutrient for animals and plants.

Although phosphorus is essential to plant life, it turns lakes and streams green by promoting overgrowth in algae and weeds. When algae and weeds die, they fall down to the bottom of lakes and streams and then decay. This decay leads to deprivation of oxygen in water causing fish and other aquatic life to die. This makes the water taste unpleasant and smell bad. Even small amounts of increased phosphorus decreases water quality.

The City of Siloam Springs is asking for your assistance by taking the time to read this brochure, and look for ways around your household to reduce the amounts of products that contain phosphorus, and/or utilize products that contain lower concentrations of Phosphorus.

If you have questions, or would like additional information and suggestions for reducing the levels of Phosphorus, please feel free to contact me at 524-5136, ext 328.

Sincerely,

David Cameron

Director of Water and Wastewater Utilities

Where is phosphorus found?

- * Soil
- * Lawn fertilizers
- * Paint and paint thinner
- * Leaves and grass clippings
- * Garbage
- * Household chemicals
- * Animal wastes
- * Improperly maintained septic systems
- * Pesticides
- * Road dust
- * Soaps and detergents
- * Motor oil
- * Gasoline
- * Wastewater discharges

FACTS ABOUT PHOSPHORUS

Just 1 pound of phosphorus can stimulate the growth of 500 pounds of algae.

In automatic dish detergents, phosphorus content can range from 0% to 8.7% (the highest amount available by law)...

Cascade contains over 8% phosphorus, while palmolive gel contains only 1.6%.

Of all elements, phosphorus is the key to managing lakes as "clean" or "green".

Street gutters that are kept free of plant residues have 30 to 40 percent lower phosphate levels in their surface runoff.

Too much green in your lakes leads to more annoyances from mosquitoes creating bigger concerns such as the West Nile Virus.

Most hand dishwashing detergents contain little or no phosphorus.

Improving water quality in a lake impaired by excessive phosphorus takes a lot of time and is very difficult.

What you do in your home and in your backyard makes a difference in the battle against phosphorus.

How does phosphorus get into our streams?

Phosphorus is carried from forests and fields into lakes and streams by water from rain and snow melt. Paved roads also help water from storms move quickly and wash into streams and leaks carrying pollutants such as motor oils and fuels. Wastewater dischargers also add phosphorus to lakes and streams.

Frequently Asked Questions

Q: What is a soil test?

A: A soil test is a process by which elements (phosphorus, potassium, calcium, magnesium, sodium, sulfur, manganese, copper and zinc) are chemically removed from the soil and measured for their "plant available" content within the sample. The quantity of available nutrients in the sample determines the amount of fertilizer that is recommended.

Q: What are the signs of eutrophication of a lake?

A: Algal blooms and massive amounts of weedy aquatic plants are some signs to look for.

Q: What are point sources of phosphorus?

A: Municipal waste treatment plants, industrial operations, and large, confined livestock operations.

Q: What are nonpoint sources of phosphorus?

A: Soil erosion, water runoff from cropland, lawns and gardens, private waste treatment systems and small livestock confinement operations.

Q: How does too much phosphorus affect fish?

A: It deprives fish of oxygen and causes them to die.

Q: What are some simple things I could do in my home that would help?

A: Easy steps such as running the dishwasher and washing machine only when you have a full load and avoiding overuse of detergent greatly helps.

Also using liquid detergents help because they contain less phosphate.

Q: Who uses the highest phosphate containing detergents?

A: Car washes use soap with high levels of phosphates.

Q: What should I look for while searching for a detergent?

A: Check the label for phosphorus content. Beware of those detergents that don't list their content.