ADEQ

ARKANSAS
Department of Environmental Quality

January 30, 2009

Gary Mills
Director
North Little Rock Waste Water Utility
7400 Baucum Pike
P.O. Box 17898
North Little Rock, Arkansas 72117-0898

Re: City of North Little Rock (NPDES #AR0020303; AFIN #6000274)
Pretreatment Program Audit/Municipal Pollution Prevention (P2)
Assessment

Dear Mr. Mills:

Please find enclosed the finished report for the audit/assessment conducted November 12th through the 14th, 2008. The report should be made available for review by appropriate officials. Discussions and an evaluation should be made concerning the findings. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

The City has personnel knowledgeable and interested in the Pretreatment Program and its implementation. Pollution Prevention (P2) activities or an established City P2 program has not progressed since the last audit.

Many of the audit/assessment recommendations have been, and are meant to aide your Program further evolve in achieving the Clean Water Act's objectives to eliminate discharge of pollutants to the environment. Again, this office feels more time should be spent on actively integrating Pollution Prevention activities into its daily Pretreatment Program duties without incurring additional expenses.

As you will see from the recommendations, many are pointed to more involvement/integration of P2 into your day-to-day pretreatment activities with ALL of the City's non-domestic dischargers.

It was a pleasure working with your staff during the audit and becoming more familiar with the City of North Little Rock, its industries, and your Pretreatment Program.

The City's Program is current with all 40 CFR 403 procedures and requirements at this time.

The City's staff is commended for timely submitting the EPA's latest "streamlining" revisions to your Pretreatment Program. A complete review is pending to determine whether the submittal is complete.

Feel free to contact this office with any questions.

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
NPDES Pretreatment Coordinator

cc: Rudy Molina/EPA 6WQ-PP
Eric Fleming/NPDES Inspector Supervisor
Anne Roberts/NPDES Enforcement

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF NORTH LITTLE ROCK, ARKANSAS

NPDES PERMIT #AR0020303

JANUARY 27, 2009

PREPARED BY: ALLEN GILLIAM

STATE PRETREATMENT COORDINATOR

ADEQ

TABLE OF CONTENTS

LIST OF ATTACHMENTS

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.

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

An audit/assessment was performed November 12 through 14, 2008, of the Pretreatment Program implemented by City of North Little Rock, Arkansas. Participants included:

Allen Gilliam	ADEQ/Pretreatment Coordinator
Kim Fuller	ADEQ/NPDES Permit Engineer Supervisor
Emric Roll	City/Pretreatment Coordinator
Ed Toland	City/Senior Pretreatment Supervisor
Shannon Wayson	City/Chemist

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of North Little Rock's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403;

* To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges;

* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements and;

* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

North Little Rock's Pretreatment Program was originally approved 3/16/84. The program was modified, reviewed, approved and incorporated into the City's NPDES permit(s) on 2/26/96.

Modifications included incorporation of an enforcement response plan (ERP), revisions to the pretreatment ordinance, program narrative and a headworks loading evaluation indicating local limits were not currently necessary for ten (10) pollutants of concern.

A certification statement submitted 11/19/97 by the City in compliance with requirements of NPDES permit #AR0020303 again indicated through a headworks loading evaluation that technically based local limits were not necessary. Once again in September of 2004 and in May of 2008, the City did a headworks loading evaluation and submitted a certification statement that local limits weren't necessary and their MAHLs were not in danger of being exceeded.

Non-substantial modifications to the Program were hand delivered to ADEQ in August of 2008. The City adopted Ordinance #8094, to be current with the new "streamlining" revisions to 40 CFR 403 on 8/11/08. A complete review is still pending by ADEQ Pretreatment staff to ensure all required revisions were made. The Pretreatment Program will be incorporated by reference into the City's three (3) NPDES permits once approved.

The City has three (3) POTWs. The Faulkner Lake facility consists of bar screen/grit removal; primary clarification; aeration lagoons; secondary clarifiers and belt press for sludge removal. Disinfection is by chlorination before discharge to the Arkansas River. Its design flow is 12 MGD and averages about 5.71 MGD.

This POTW receives approximately 0.8 MGD from 14 significant industries, 1 of which categorical. Sludge is sent through a belt press for dewatering and composted averaging about 1,261 dry English tons/year.

The Five Mile Creek POTW consists of bar screen grit removal; aeration lagoons followed by polishing. Disinfection is by chlorination prior to discharge to the Arkansas River. Its design flow is 6.6 MGD and averages 4.2 MGD. This POTW receives "significant" industrial wastewater (~8,400 gpd) from one (1) hospital. Its sludge is stored, very infrequently dredged and disposed of on City owned land.

The White Oak POTW consists of bar screen; aeration lagoons followed by chlorination prior to discharge to the Arkansas River. Its design flow is 4.25 MGD and averages 3.26 MGD with only one (1) surgical "hospital" permitted to discharge. Its sludge is also stored, infrequently dredged and land applied on City owned property.

There's been no pattern of toxicity shown from any of their treatment plants as there's been no lethality nor sub-lethality shown in the last three (3) years.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to four (4) of their 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 as Attachment A.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City. 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 North Little Rock's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1) Under ***40 CFR 403.12(p)***, "The Industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261...."

There was evidence the City had sent this notification to the known hazardous waste generators in 2005 but, recent evidence shows other small quantity generators exist that are not on the ADEQ list provided during the audit. The City shall notify their dentists, doctors, chiropractors, hospitals, veterinarians, nursing homes, X-ray clinics, and photo processors.

A customized cover letter is recommended including the above regulatory citation specifically requesting information about the businesses' practice of disposing of dental waste amalgam/scrap/sludge (Hg) and their vacuum system wastewater, silver laden wastewater from film processing and pharmaceutical acutely hazardous waste ("P" and "U" wastes).

2) Under ***40 CFR 403.8(f)(2)(iii)***, "Notify Industrial Users identified under paragraph (f)(2)(i) of this section, of applicable Pretreatment Standards..."

Send notification of the Streamlining regulations to 40 CFR 403. These changes could have an effect on your industries they should be informed of. Include the streamlining website where the revisions are located: http://www.epa.gov/fedrgstr/EPA-WATER/2005/October/Day-14/w20001.pdf .

3) Under ***40 CFR 403.8(f)(1)(B)(3)***, "Effluent limits, including Best Management Practices, based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;..."

Koppers' permit did not contain any units for their categorical limits and must be included.

4) Under ***40 CFR 403.8(f)(v)***, "Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by Industrial Users, compliance or noncompliance with applicable Pretreatment Standards and Requirements by Industrial Users.)..."

During the file review, it was discovered that the inspections at Koppers and L'OREAL did not indicate they were hazardous waste generators. These two (2) companies were listed on the ADEQ list of generators. The inspection forms should have denoted this or the discrepancy from the ADEQ's list needs to be rectified by the industries.

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

1) Strongly recommend drafting standard operating procedures (SOPs) for ALL day-to-day Pretreatment activities. A new City coordinator may be placed into the position of not knowing how the City has been implementing all the required procedures in 40 CFR 403.8. These procedures, from administrative paperwork handling to field activities should be documented.

2) Recommend updating the fact sheets for the City's permitted industrial users. It was noted during the file review, all industries' information was not current, included and not extensively comprehensive. All information about the City's permitted industries are scattered throughout its inspections and applications, but should be housed in one document. These fact sheets should be sent to the industry representative for them to fully complete. Comprehensive narrative descriptions of their manufacturing operations and updated/accurate schematics should also be asked for AND dated. See EPA's "Industrial User Permitting Guidance Manual" (9/89), Appendix I for further information.

Also include whether the facilities have pollution prevention opportunities either in the fact sheets or somewhere in the inspection form.

3) Include pollution prevention (P2) and best management practice (BMP) questions on future industry/business survey questionnaires.

4) Consider requiring your industries to submit periodic P2 activities' progress and/or success stories. These stories need to be circulated on EPA Region 6's "Zero Waste Network" for maximum networking and trading of similar industry process information (www.zeroWasteNetwork.org). Pounds of pollutants reduced, energy and water conservation practices, raw material substitution, just-in-time manufacturing, money saved by utilizing P2 practices would be of great benefit not only for the Region 6 network, but for similar industries/businesses in Arkansas.

5) Consider reducing even further the City's sampling technician's frequency "visiting" each industry's sampling station. This could open up more time for the City to discover the advantages of establishing a P2 program and work with the smaller business sectors who, in aggregate, may be influenced to participate realizing the money that can be saved.

6) Recommend allowing more time for Pretreatment personnel to devote to learning more about a P2 program so they may better understand the economic and environmental advantages not only for the City's industries, but to the City's wastewater collection system as well.

7) Inspection reports should be modified to include more comprehensive information documented regarding the actual origins of process wastewater and all manufacturing processes (machining operations coolants/lubricants, floor sweep wastewater, e.g.). The industry representative's signature should also be included. If subsequent inspections reveal "no changes since the last inspection", it could be so noted. It's also recommended to include how hazardous/toxic wastes are "handled" throughout the facility (hard line, totes, fork lifts, hand carried buckets, etc).

If the above referenced fact sheets were up-to-date and accurate, inspection reports could simply reference, "see fact sheets on file with the City" for most of this information.

8) Recommend maintaining a master list of non-significant IUs (car washes, printers, auto repair shops, e.g.) that can be sorted by SIC code. Best management practices through general permits may be an option for some of these non-significant IUs with report/certification conditions. This would give some level of control to the City such as right of entry for inspections, if necessary.

9) Recommend submitting stories to the local newspaper (as a public service) regarding proper disposal of pharmaceuticals, grease and other household toxics. A very informative article suggested is a brief story of what the City's wastewater collection system and treatment plants do, miles of collection system and the valuable purpose it serves in keeping waters of the State clean.

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

The City has submitted what they consider their final "streamlining" revisions to their Pretreatment program. This office has not completed a complete review of that submittal. At this time, there is no further action required of the City regarding Program modifications.

* * * * * * * *

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.

nlrau08

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: North Little Rock NPDES #: AR0020303
Mailing address: 7400 Baucum Pike, P.O. Box 17898

Permit Signatory: Emric Roll Title: Pretreatment Coordinator

Telephone: 501.945.7186 FAX NUMBER: 501.945.2367

Pretreatment Contact: Emric (Ric) Roll Title: Same
Address: Same
Telephone: same
e-mail rroll@northlittlerock.ar.gov

Pretreatment program approval date: 3/16/84

Dates of approval of any substantial modifications: 2/26/96
Non-Substantial mods hand delivered ~8/7/08 to be current with 40 CFR 403 revisions
Month Annual Pretreatment Report Due: March *(pending review)*

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 11/12 - 11/14/08 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	Pretreatment Coordinator/ADEQ	501.682.0625
Kim Fuller	NPDES Permit Eng.Supv./ADEQ	501.682.0643

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Ric Roll	Pretreatment Coordinator	Same
Ed Toland	Pretreatment Supv.	"
Shannon Wayson	Chemist	"

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	11/05	"No problems. Program in compliance"

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?

. . . . . .

This City's program and industry make-up has not changed substantially since the last audit conducted in March of 2005. There has been no substantial Program modifications, implementation, personnel or industry "movement" since then. Only one of their categoricals, Deluxe, has ceased operations and closed down.

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
*AR0020303	Faulkner Lake	4/01/08	3/31/13
AR0020320	Five Mile Creek	2/01/07	1/31/12
AR0038288	White Oak	2/01/05	1/31/10

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Faulkner Lake
Location Address: 7400 Baucum Pike

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 12 MGD; Actual (Average)- 5.71 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 16

Industrial Contribution to this Treatment Plant

# of SIUs : 14 # of CIUs : 1
Industrial Flow (mgd): 0.83 Industrial Flow (%) : 14.6%

Level of Treatment		Type of Process(es):
Primary	✓	Bar screen; grit removal; primary clarifier;
Secondary	✓	diffused air-activated sludge; secondary clarifier
Tertiary		and belt press for sludge removal

Method of Disinfection: Chlorination

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3C

Receiving Stream Use: Fishable/Swimmable; primary contact recreation

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

Method of Sludge Disposal:		Quantity of Sludge:
	Land Application	dry tons/yr.
	Incineration	dry tons/yr.
	Monofill	dry tons/yr.
	Mun. Solid Waste Landfill	dry tons/yr.
	Public Distribution	dry tons/yr.
	Lagoon Storage	dry tons/yr.
✓	Other (compost) (American Compost Inc.)	1261 dry (english)tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals & TRC

a. (continuation of individual treatment plant information for Faulkner Lake 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: Same
Issuance Date: "
Expiration Date: "

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

YES NO N/A

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

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) At 8% critical dilution, as of 11/06/08 there has been not lethality nor sub-lethality shown for either species in the past 3 years.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1	1	
Whole Eff. Testing		4		
TCLP				
Other:				

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

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

YES NO N/A

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

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

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

Parameters Violated	Cause(s)

YES NO

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

B. TREATMENT PLANT INFORMATION

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Five Mile Creek
Location Address: 5601 East 54th Street

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 6.6 MGD; Actual (Average)- 4.2 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 5

Industrial Contribution to this Treatment Plant

# of SIUs : 1 (St. Vincents Hosp.) # of CIUs : 0
Industrial Flow (gpd): ~8,400 Industrial Flow (%) : 0.82 %

Level of Treatment		Type of Process(es):
Primary	✓	Bar screen; 2 aerated lagoons and a
Secondary	✓	polishing pond
Tertiary		

Method of Disinfection: Chlorination

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3C

Receiving Stream Use: fishable/swimmable; primary contact recreation

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

Method of Sludge Disposal: *N/A* Quantity of Sludge:

_____	Land Application	_____ dry tons/yr.
_____	Incineration	_____ dry tons/yr.
_____	Monofill	_____ dry tons/yr.
_____	Mun. Solid Waste Landfill	_____ dry tons/yr.
_____	Public Distribution	_____ dry tons/yr.
_____	Lagoon Storage	_____ dry tons/yr.
_____	Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals & TRC

a. (continuation of individual treatment plant information for Five Mile Creek 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: Same
Issuance Date: "
Expiration Date: "

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

YES	NO	N/A	
✓			Has the Control Authority submitted results of whole effluent biological toxicity testing.
	✓		Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) At 4% critical dilution, as of 11/06/08 there has been not lethality nor sub-lethality shown for either species in the past 3 years.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1	1	
Whole Eff. Testing		2		
TCLP				
Other:				

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

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

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

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

Parameters Violated	Cause(s)

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

B. TREATMENT PLANT INFORMATION

3. Individual Treatment Plant Information

a. Name of Treatment Plant: White Oak
Location Address: 6000 Heilman Rd

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 4.25 MGD; Actual (Average)- 3.26 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 10

Industrial Contribution to this Treatment Plant

# of SIUs : 1 # of CIUs : 0
Industrial Flow (gpd): ~5,000 Industrial Flow (%) : .2 %

Level of Treatment		Type of Process(es):
Primary	✓	Bar screen and aerated lagoons
Secondary	✓	
Tertiary		

Method of Disinfection: Chlorination

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3C

Receiving Stream Use: fishable/swimmable; secondary contact recreation

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

Method of Sludge Disposal: *N/A* Quantity of Sludge:

_____	Land Application	_____ dry tons/yr.
_____	Incineration	_____ dry tons/yr.
_____	Monofill	_____ dry tons/yr.
_____	Mun. Solid Waste Landfill	_____ dry tons/yr.
_____	Public Distribution	_____ dry tons/yr.
_____	Lagoon Storage	_____ dry tons/yr.
_____	Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: Conventionals & TRC

a. (continuation of individual treatment plant information for White Oak 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: Same
Issuance Date: "
Expiration Date: "

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

YES NO N/A

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

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) At 23% critical dilution, as of 11/06/08 there has been not lethality nor sub-lethality shown for either species in the past 3 years.
***Suggest petitioning DEQ to reduce WET frequency.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1	1	
Whole Eff. Testing		4		
TCLP				
Other:				

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

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

YES NO N/A

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

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

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

Parameters Violated (White Oak)	Cause(s)
TRC (7/07 - 7/08)	?
BOD5 (7/07, 6/08, 8/08)	?
Fecals (8/08)	?
Missing reports (8/08)	?

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. Non-substantial, yes. Substantial, no.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
N/A	Non-Substantial Mods hand delivered ~8/7/08	Pending
	which included required mods to be current with	
	streamlining regs to 40 CFR 403.	

2. Modifications in Progress:

Date Requested	Nature of Modification
	See above

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: 3/16/84 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 8/11/08
Date of most recent Pretreatment Program modification approval: pending

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?

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: *The City of Sherwood has St. Vincents Hosp.*

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

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

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	Sherwood (City of-)	0	1	interjurisdictional
2.	(St. Vincents Hospital)			Permit
3.				
4.				

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

Not relying on Sherwood for these	Problems
___ Updating industrial waste survey	_____
___ Notification of IUs	_____
___ Permit issuance	_____
___ Receipt and review of IU reports	_____
___ Inspection and sampling of IUs	_____
___ Assessment of IUs for P^2 activity	_____
___ Analysis of samples	_____
___ Enforcement	_____
___ Other: _____	_____

Briefly describe other problems: _____

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

IU Name	Problem	NPDES Permit Violation Yes	No
n/a		___	___
		___	___

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

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

What methods are used to update the IWS:

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

How often is the survey to be updated? Ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: No

YES	NO	
	✓	Have any new SIUs been identified within the last 12 months? If yes:

Name of IU	Type of Industry	Is the IU Permitted?

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

a.	15	SIUs (As defined by the Control Authority) [WENDB-SIUS]
b.	1	Categorical Industrial Users (CIUs) [WENDB-CIUS] *(Koppers)*
c.	13	Noncategorical SIUs
d.	0	Other regulated nonsignificant IUs (Describe)_____
	15	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:
n/a

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

YES NO

✓* ___ Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application? **See Attch. A-3h for example*

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

What is the maximum term of the control mechanism? 5 yrs.

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

IU NAME	PERMIT EXPIRATION DATE
n/a	

YES NO

___ ✓ Does the Control Authority accept trucked septage wastes?

___ ✓ Does the Control Authority accept other trucked wastes?

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

YES NO

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

___ ___ Are all applicable categorical standards and local limits applied to trucked wastes ?

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

Pollutant	Limit
n/a	

Describe the discharge point(s) (including security procedures):

n/a

Yes No

___ ✓ 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, that are applied to UST cleanup sites:

Pollutant	Limit
N/A	

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?

'05* Date Notified Letter Method of Notification

**See Attach. A-1 for example*

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

	Federal Register	✓	Journals, Newsletters
✓	Meetings, Training	✓	Other internet
✓	Government Agencies		Other

YES	NO	
	✓	Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI,Audit or Annual Report?

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
n/a			

YES	NO	
	✓	Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical (ADEQ) MAHL Calculated (Lbs/day)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓			✓		✓	0.71
Cadmium (Cd)	✓			✓		✓	0.58
Chromium-Total	✓			✓		✓	632
Copper (Cu)	✓			✓		✓	21.0
Cyanide (CN)	✓			✓		✓	18.3
Lead (Pb)	✓			✓		✓	4.61
Mercury (Hg)	✓			✓		✓	0.06
Molybdenum (Mo) *	✓ (default data used)			✓		✓	4.01
Nickel (Ni)	✓			✓		✓	4.28
Selenium (Se) *	✓			✓		✓	0.86
Silver (Ag)	✓			✓		✓	6.02
Zinc (Zn)	✓			✓		✓	44.11

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

YES NO

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

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

YES NO

___n/a___ 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? *n/a*

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)	N/A		
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?
Ord. narrative provisions would make them applicable to all three (3) POTWs

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1	1/year	N/A
Other SIUs	1	1/year	
Sampling:			
CIUs	1	1/year	
Other SIUs	1	1/year	
Reporting:			
CIUs	2	2/year	
Other SIUs	2	2/year	
Self-Monitoring:			
CIUs	2	2/year	
Other SIUs	2	2/year	

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

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

Does the Control Authority routinely split samples with industrial personnel:

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

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

	Analytical Method *	Name of Laboratory
Metals	ICP	Env. Services Co.
Cyanide	Spectrophotometric	"
Organics	GC/MS	"
Other	Pentachlorophenol meth. #604	"
	WET	Huther (TX)

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

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

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe: tubing replaced monthly per IU; duplicates conducted; follow EPA's quality assurance program; dedicated samplers and leave written notes at sampling points if anything looks wrong.

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

5 days Conventionals
<2 wks Metals
" Organics

✓* ___ Is there an established protocol clearly detailing sampling location and procedures? *"Not in writing"

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

If yes, explain: n/a

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: *City personnel visit each IU's sampling point daily with the option of doing the analysis

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)] *In Program mod package, pending DEQ review.*

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

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

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

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

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

✓ Imprisonment
✓ Termination of Service
✓ Other: Performance bonds, Liability Insurance

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

YES NO

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

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

___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 Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

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

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

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

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

YES NO

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

_____

Has the Control Authority experienced any of the following:

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

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount
Civil	____	$ _____
Administrative	14	$ 4,277
Total	14	$ 4,277 [WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES	NO	
✓		Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES	NO	
✓		computerized
✓		hard copy
		OTHER: _____

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
	✓	Inspection and Sampling schedule
✓		Monitoring Data
✓		IU Compliance Status Tracking *(SNC is hand calculated)*
		Other: _____

Can IU monitoring data can be retrieved by:

✓		Industry name
	✓	Pollutant type
	✓	Industrial category or type
	✓	SIC Code
✓		IU discharge volume
	✓	Geographic location
	✓	Receiving treatment plant (i.e.if > one plant in the system)
		Other (specify) _____
✓		Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]
	✓	Have IUs requested that data be held confidential?

How is confidential information handled by the Control Authority?
"Locked cabinet and follow FOI procedures"

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

If yes, please explain: _____

✓		Are all records maintained for at least 3 years?

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

Estimated about 3.5

YES NO

___ ✓ Have any problems in program implementation been observed which appear to be related to inadequate funding?
If yes, describe and show below the source(s) of funding for the program:

_____

_____

		Percent of Total Funding
✓	POTW general operating fund (G.O.F.)	100
___	IU permit fees	___
___	monitoring charges	___
*	industry surcharges *(all goes back into the G.O.F.)*	
___	other (describe) _____	___
	Total	100%

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

_____

_____

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

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

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	Standard list of all _____
✓	___	Safety equipment	" _____
✓	___	Vehicles	" _____
✓	___	Analytical equipment	" _____

L. POLLUTION PREVENTION *(nothing of mention has been accomplished since last audit)*

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.):
Other than additional questions on IU inspections, nothing much more has been done in the last 3+ years

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

3. Has the POTW implemented any kind of public education program? If yes, describe:
School children tours of the POTW

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

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
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? *No*
If yes, which of the "Guides to Pollution Prevention" were used? _____

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name JB Hunt File/ID No. 2012080115
Industry Address 2901 Hwy 161 North
Industry Description Truck (exterior) wash and maintenance
Industrial Category N/A 40 CFR N/A SIC Code: 4231
Ave. Total Flow (gpd) _____ Ave. Process Flow (mgd) 130,000

Industry visited during audit: YES

Comments: _____

FILE #: 2 Industry Name Koppers File/ID No. 2012080117
Industry Address 2201 Edmonds Street
Industry Description R.R. wooden tie preservation
Industrial Category Timber Products 40 CFR 429 SIC Code: 2491
Ave. Total Flow (gpd) Same Ave. Process Flow (gpd) 34,000

Industry visited during audit: YES

Comments: Subpart H, Wood preserving - Boulton

FILE #: 3 Industry Name L'OREAL, USA File/ID No. 2012080118
Industry Address 11500 Maybelline Rd.
Industry Description Manufacturing of cosmetics, water and solvent based
Industrial Category N/A 40 CFR n/a SIC Code: 2844
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 300,000

Industry visited during audit: YES

Comments: _____

FILE #: 4 Industry Name Union Pacific R.R. File/ID No. 2012080124
Industry Address 800 Pike Avenue
Industry Description R.R. Locomotives & railcar repair/paint
Industrial Category N/A 40 CFR N/A SIC Code: 4011
Ave. Total Flow (gpd) _____ Ave. Process Flow (mgd) 0.25 - 0.35

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

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	
2. Is the user subject to categorical pretreatment standards?	no	✓	no	no	
a. New source or existing source (NS or ES)?	n/a	ES	n/a	n/a	
b. Is this IU one identified as having P^2 potential?	no	no	no	no	

B. Control Mechanism

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Does the file contain an application for a control mechanism? *(See Attch. A-3 for example)*	✓	✓	✓	✓	
If yes, what is the application date?	5/08	5/08	5/08	4/08	
Does it ask for Pollution Prevention information?	✓	✓	✓	✓	
2. Does the file contain a Permit? *(See Attch. A-4 for example)*	✓	✓	✓	✓	
Permit Expiration Date?	8/12	8/12	8/12	8/12	
Is a fact sheet included?	1	1	1	1	
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?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	✓	2	✓	✓	
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	
f. Sampling frequency?	✓	✓	✓	✓	
g. Sampling locations?	✓	✓	✓	✓	
h. Requirement for flow monitoring?	✓	✓	✓	✓	

Comments: 1) Basic fact sheets have been started but, need more information; 2) No units (mg/l) for As, Cu & Cr.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	
j. Applicable IU reporting requirements?	✓	✓	✓	✓	
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	
Records retention?	✓	✓	✓	✓	
Civil and Criminal Penalty provisions?	✓	✓	✓	✓	
Revocation of permit?	✓	✓	✓	✓	
l. Compliance schedules/ progress reports	n/a	n/a	n/a	n/a	
m. General/Specific Prohibitions?	✓	✓	✓	✓	
n. Where technologically and economically achievable, are P^2 aspect included?	no	no	no	no	
C. Application of Standards					
1. Has the IU been properly categorized?	✓	✓	✓	✓	
2. Were both Categorical Standards and Local Limits properly applied?	✓	✓	✓	✓	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	no	no	no	no	
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	n/a	n/a	n/a	n/a	
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	n/a	n/a	n/a	n/a	
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	
D. Compliance Monitoring					
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	1	1	1	1	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	n/a	n/a	n/a	n/a	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Time	Flow	Flow	Flow	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	

Comments: 1) City sends sampling tech. to every IU every day of the year to at least open sampling station. IU never knows when the City may analyze their discharge.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
Inspections *(See Attch. A-5 for example)*					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	
b. Date of last Inspection	8/08	8/08	10/08	11/08	
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	n/a	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	1	1	1	1	
f. Evaluation of pretreatment facilities?	✓	✓	✓	✓	
g. Evaluation of self-monitoring equipment and techniques?	✓	✓	✓	✓	
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	✓	✓	✓	✓	
i. Manufacturing facilities?	1	1	1	1	
j. Chemical handling and storage procedures?	2	2	2	2	
k. Chemical spill prevention areas?	1	1	1	1	

Comments: 1) Inspections could "refer to detailed info provided by IU located with IU's "fact sheet"; 2) More questions should be asked about chem. handling procedures

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Hazardous waste storage areas and handling procedures?	N/A	1	1	N/A	
m. Sampling procedures?	✓	✓	✓	✓	
n. Laboratory procedures?	✓	✓	✓	✓	
o. Monitoring records?	✓	✓	✓	✓	
p. Evaluation of Pollution Prevention opportunities?	2	2	2	2	
q. Control Authority inspector signature?	✓	✓	✓	✓	
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	✓	✓	✓	✓	
11. Does the file include:					
a. BMR?	n/a	Archived	n/a	n/a	
b. 90-Day Report?	n/a	Archived	n/a	n/a	
c. All periodic reports?	✓	✓	✓	✓	
d. Compliance schedule reports?	n/a	n/a	n/a	N/a	
12. Did the IU report on all required parameters?	✓	✓	✓	✓	
13. Did the IU comply with the required sampling frequency(s)?	✓	✓	✓	✓	
14. Did the IU report flow?	✓	✓	✓	✓	
15. Did the IU comply with the required reporting frequency(s)?	✓	✓	✓	✓	
16. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	✓	✓	
17. Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	

Comments: 1) These 2 IUs were identified on ADEQ haz waste list but were not denoted on inspection form; 2) Some basic P2 questions are asked.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
18. Has the IU developed a Slug Control and Prevention Plan?	Not Req'd	✓	✓	✓	
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	NO	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	n/a	n/a	n/a	n/a	
b. Did POTW respond to the spill?	n/a	n/a	n/a	n/a	

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	n/a	n/a	n/a	n/a	
b. IU self-monitoring results?	n/a	n/a	n/a	n/a	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	n/a	n/a	n/a	n/a	
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	0	0	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	n/a	n/a	n/a	n/a	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	n/a	n/a	n/a	
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	
6. Was the IU notified of all violations?	n/a	n/a	n/a	n/a	

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
7. Was follow-up enforcement action taken by the Control Authority?	n/n	n/n	n/n	n/n	
8. Did the Control Authority follow its approved ERP?	✓	✓	✓	✓	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	n/a	n/a	n/a	n/a	
10. Is there a compliance schedule? If yes:	n/a	n/a	n/a	n/a	
11. Were there any compliance schedule violations?	NO	NO	NO	NO	
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	
b. TRC	✓	✓	✓	✓	
c. Pass through/Interference	✓	✓	✓	✓	
d. Spill/slug loads	✓	✓	✓	✓	
e. Reporting	✓	✓	✓	✓	
f. Compliance schedule	✓	✓	✓	✓	
g. others (specify)					
13. Was the SIU published for SNC?	no	no	no	no	
Date of publication.	n/a	n/a	n/a	n/a	

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of N. Little Rock NPDES #: AR0020303

Date of Audit: 11/12 - 11/14/08 Date entered into QNCR: 1/26/09
(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.

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of N.Little Rock NPDES #: AR0020303

Name, address and phone number of industry:
Union Pacific Railroad, 800 Pike Ave., 501.373.2066
Type of industry: Locomotive repair & Maintenance
Date/Time of visit: 11/13/08 / 8:55 a.m.
Industry contacts: Tom Franklin - UP Manager Maintenance Ops / Marty Waldrop - Pretreatment subcontractor w/Hatch Mott

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

Additional comments: Facility brings in by rail locomotives for repair, maintenance and repainting. Complete overhauls are done every 800K miles. This may involve the complete disassembly of the entire piece of equipment for rework, reassembly and painting. Sometimes they do 2 to 3 per day. Facility employs over 1000 people. The site visit began at their pretreatment and then to the operations building. No categorical processes exist at this facility.

Visit conducted by: Gilliam/Toland/Fuller/Wayson

Date: 11/13/08 Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of N.Little Rock NPDES #: AR0020303

Industry name: Union Pacific Railroad

Additional comments: "Proceco" self-contained parts washers are at various stations throughout the huge 230,000 square foot complex. All are set up basically the same as a typical dishwasher with internal high pressure, hot, soapy water spray nozzles. The gear cases of the diesel engines are by far the "nastiest" to be cleaned. Washwaters are basically mild detergent and water although the mainframe washwater uses a butyl-cellusol soap. Other sources of wastewater includes: the paint strip (5000-7000 psi high pressure water/sand mix) room; high pressure fresh water rinse room prior to paint room and general floor wash. Paint "chips" or particles are contained in the sand which is sent to a landfill as a "special waste". Everything from their maintenance ops and some stormwater wastewater gravity flows to their "headworks". From there, the wastewater is pumped to one of 3-280K gallon holding tanks where it is batch treated usually in a 10 hour period. The 4th tank is an equalization tank. An outside contractor has been hired for operating the pretreatment equipment. Pretreatment begins with basic oil/water gravity separation with skimming; equalization tank; polymers, alum or sulfuric acid added to floc and further separate oil and settle solids in the DAF unit. Oils are skimmed and sent off-site. Somebody is at "pretreatment" 24 hrs/day. Facility's old holding pond is now "clean", lined and is maintained for "clean" rainfall events. Adequate sampling site and equipment. Both facility and city reps were very familiar with wastewater sources, regulations and pretreatment requirements.

Visit conducted by: Gilliam/Toland/Fuller/Wayson/

Date: 11/13/08 Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of N.Little Rock NPDES #: AR0020303
Name, address and phone number of industry:
J.B. Hunt, 2901 Hwy 161 North, 501.945.8682
Type of industry: Truck Wash/Maintenance Date/Time of visit:
11/13/08 / 12:00 p.m.
Industry contacts: Melisa Alvers - Admin. Asst / Jim ? -
Shop Foreman

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

Additional comments:

Facility washes the exterior of their trucks. Wash bay is robotic and computerized. They wash 10 to 15 trucks/day. Citric acid is first sprayed on, then soap is applied which neutralizes the acid, brush down stage, then the final rinse is fresh city water which drains to main holding tank. It takes about 150 gallons per truck to completely wash.

Visit conducted by: Gilliam/Toland/Fuller/Wayson

Date: 11/13/08 Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of N.Little Rock NPDES #: AR0020303

Industry name: J.B. Hunt

Additional comments:

Drains throughout the bay are cleaned about 1/month. Solids are sent to the landfill.

Automatic pumps and sensors control the pH in the primary holding tank before discharge to the city.

Not much to observe as this was not a complex process to understand. Industry and city reps were familiar with processes and each other. Industry reps were well aware of problems they may have had in the past with pH and upgrades had been made to correct them.

Visit conducted by: Gilliam/Toland/Fuller/Wayson

Date: 11/13/08 Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of N.Little Rock NPDES #: AR0020303
Name, address and phone number of industry:
L'OREAL, USA, 11500 Maybelline Road, 501.955.8590

Type of industry: Cosmetics Date/Time of visit:
11/13/08 / 1:30 p.m.
Industry contacts: Kay Mueller - Env. Mgr / Steve James - Supv

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

Additional comments: Facility manufactures different cosmetic type products such as mascara, face/body powders, sunscreens and make-up removers. Only areas where wastewater was generated/pretreated were visited. Powdered products' formulation areas generate no wastewater.
Coverage under the Pharmaceuticals category was discussed but, IU rep mentioned titanium dioxide as the only ingredient that might be considered as an "active" ingredient but was not used for "medication" with any of their products.

Visit conducted by: Gilliam/Toland/Fuller

Date: 11/13/08 _____

(signature of auditor conducting visit)

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

Control Authority: City of N.Little Rock NPDES #: AR0020303

Industry name: L'OREAL, USA

Additional comments: Facility's's wastewater is consists of wash down wastewater from the mixing tanks/blending vessels for mascaras. These enclosed vessels are filled up with hot water, surfactants/soaps (pH ~14 s.u.), "homogenized" (blenders), drained and then visually inspected for cleanliness. Any piped (stainless steel) transferred product is "cleaned in place" (CIP) with the same soaps and an anti-foam additive. The mixing containers they make their powdered products in are not washed with water. In those areas they brush everything down and some places they use talc as an aid. This helps avoid any microbe issues. Pretreatment is in a separate building. All "process" wastewater gravity flows to lift station then pumped into a 30,000 gallon equalization tank (they also have two other back-up holding tanks for emergencies) where floc is added then sent to a dissolved air flotation device to further remove oils, greases and solids. pH adjustment is by CO2. Treatment works best when their wastewater is around 8.5 to 9 s.u. Adequate sampling site for 24-hour composites.

Mixing/blending of products with any solvents is done in a completely separate building with no wastewater generated and no floor drains. There have been no major changes since the last audit 3+ years ago. IU and City reps very familiar with Pretreatment requirements, plant processes and treatment. IU reps cooperative and seemed very transparent with answers to any questions asked.

Visit conducted by: Gilliam/Toland/Fuller

Date: 11/13/08 Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of N. Little Rock NPDES #: AR0020303

Name, address and phone number of industry:
Koppers, 2201 Edmonds St., 501.945.6429

Type of industry: Wood Treater CFR 429

Date/Time of visit: 11/14/08 / 8:05 a.m.

Industry contacts: Bill Reneau - Asst. Plant Manager

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

Additional comments: Facility has not changed its basic processes/pretreatment since the audit 3+ years ago. Most oak railroad ties are air dried (6 months to a year). Air drying area covers around 150 acres. Some are pressure treated with creosote to "squeeze" the water out, therefore the "boultanizing". 5 to 6 hundred ties (loaded on flat rail cars) at a time can be loaded into the horizontal pressure cylinders (7' diameter X 150' long).

Visit conducted by: Gilliam/Toland Date: 11/14/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of N.Little Rock NPDES #: AR0020303

Industry name: Koppers

Additional comments:

Cylinder is filled with creosote (oil) and pressurized up to 180 psi at a temperature of 200 degrees F. Under these conditions, moisture in the wood is changed to steam. This cycle can take up to 6 hours depending on wood density and moisture. Oil is pumped back to 4 "work" tanks. A vacuum is pulled on the cylinder (boultanizing) capturing the oily water condensate. Wastewater (estimated at 32,000 gpd) also contributed is from the expansive concrete "drip pads" and secondary containment (~90,000 ft^2), general steam cleaning and rainwater all flow to the pretreatment equipment.

This consists of an open baffled concrete tank for basic oil/ water separation (API separator); then to above ground aerated activated sludge treatment where caustic or phosphoric is added as needed; then to equalization prior to discharge to the city.

They have about 1 million gallons storage capacity for any wastewater. They do utilize a "decant" tank to re-use as much water as feasible.

Adequate sampling station. Both IU and City rep were very familiar with processes, treatment and sampling.

Visit conducted by: Gilliam/Toland Date: 11/14/08

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

August 3, 2005

A. Tenenbaum Company Inc.
4500 West Bethany Rd.
No. Little Rock, AR 72231

Dear: Sir

A recent audit conducted by the Arkansas Department of Environmental Quality (ADEQ) recommends that North Little Rock Waste Water Utility provide a copy of 40CFR 403.12(p) to all hazardous waste generators. Please become familiar with paragraph (p) so that in the event of a discharge that could be considered hazardous, you may make the proper notifications.

Questions may be addressed to me at 945-7186 ext. 149.

NORTH LITTLE ROCK WASTE WATER UTILITY

Mitch Foreman
Senior Industrial Technician

Attachment A-2

WASTEWATER SURVEY
FOR
NON-RESIDENTIAL ESTABLISHMENTS

SECTION A: GENERAL INFORMATION

1. Name of Business: Brent and Sam's Cookies, Inc.
   Mailing Address: 30 Collins Industrial Pl Phone: _____
   North Little Rock AR 72113

   Site Address: SAME

2. Name and Title of Contact Person: Jim Oliver
   (Authorized to represent this firm in official dealings with NLR Waste Water Utility)
   Alternate: Jim Mullinex

3. Are there discharges to the sanitary sewer other than domestic waste water (bathroom and kitchen waste)? [] Yes [✓] No

SECTION B. PRODUCTS, SERVICES, WASTEWATER INFORMATION

1. Major products manufactured or services provided at this location:
   Cookies

2. What is the Standard Industrial Classification (SIC) Code(s) for the business at this location?
   2052

3. Number of employees at this location:
   Full time 68
   Part time _____

   Shifts worked per day: 2 Hours: 2, 10hr shifts

4. Work or production schedule at this location: (business hours if commercial)
   0700AM - 0500pm, 0500pm - 0300AM

5. Types of waste discharged to sanitary sewer system. Check all that apply.

	Avg gal/day
[✓] Sanitary waste from bathrooms	
[✓] Cleanup waste from floor drains	55gal
[] Kitchen waste	
[] Wastewater from manufacturing process(es)	
[] Wastewater from parts cleaning or preparation	
[] Cooling water discharge	
[✓] Equipment/facility wash down	
[] Other (describe)	

Both

Total gallons _____

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

_____

_____

_____

_____

6. Water use at this location: (from water bill)

_____ thousands of gallons per month or

31.1 hundreds of cubic feet per month or

_____ gallons per day

7. Under what name is water bill received?

BRENT & SIAMS COOKIES INC

8. Is this business required to report discharges under EPA General Pretreatment Regulations (40 CFR 403)? [] Yes [✓] No

9. Are wastewater pretreatment facilities installed? [] Yes [✓] No
If yes, please describe type of treatment and capacity of system.

_____

_____

_____

SECTION C. CHEMICALS/STORAGE

1. Are bulk chemicals received and stored for use in this business? [] Yes [✓] No
If yes, please list chemicals used or stored an approximate quantity.

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Please list raw materials and process additives used.
N/A

3. Is a spill containment and control plan in use? [] Yes [X] No

4. Is production subject to seasonal variation? [] Yes [X] No
If yes, please describe seasonal cycle. _____

5. Are any process changes or expansions planned in the next three years? [] Yes [X] No
If yes, attach a separate sheet describing nature of planned changes or expansions.

THIS IS TO BE SIGNED BY AN AUTHORIZED OFFICIAL OF YOUR FIRM AFTER REVIEW OF THE INFORMATION BY THE SIGNING OFFICIAL.

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those immediately responsible for obtaining the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and/or imprisonment.

Signature Richard Binz Date 2-27-08

Name: Richard Binz

Title: Controller

Return completed form to:

NORTH LITTLE ROCK WASTE WATER UTILITY
INDUSTRIAL PRETREATMENT
P.O. BOX 17898
NORTH LITTLE ROCK, AR 72117

Attachment A-3

NORTH LITTLE ROCK WASTE WATER UTILITY

PERMIT APPLICATION FORM

Facility Name: L'OREAL USA Products, Inc.

Operator Name: L'OREAL USA Products, Inc

Facility Address: 11500 Maybelline Road

Business Mailing Address: 11500 Maybelline Road

City: North Little Rock State AR Zip 72117-1886

Designated signatory authority of the facility:

Name KAY MUELLER

Title: ENVIRONMENTAL MANAGER

Address: 11500 Maybelline Road

City: North Little Rock State AR Zip 72117-1886

Phone Number 501-955-8590 Fax Number 501-955-8499

NOTE: THE AUTHORIZATION SPECIFIES EITHER AN INDIVUDAL 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. THE INDIVIDUAL SHALL BE A LEGAL RESIDENT AND RESIDE WITHIN THE STATE OF ARKANSAS.

Designated facility contact:

Name: KAY MUELLER

Title: ENVIRONMENTAL MANAGER

Phone Number 501-955-8590 Fax Number 501-955-8499

Name on water account:

Name MAYBELLINE
Street 11500 MAYbeLLiNe ROAD

City North Little Rock State AR Zip Code 72117-1886

Water account number(s): 936-0078-300 936-0075-300 936-0080-300

List average water usage on premises:
(new facilities may estimate)

TYPE	AVERAGE WATER USAGE (GPD)	INDICATE ESTIMATED (E) MEASURED (M)
Contact cooling water	0	x
Noncontact cooling water	17213	M
Boiler Feed	136	M
Process	13256	M
Sanitary	18200	M
Air Pollution Control	0	x
Contained in Product	530	M
Plant & Equipment Washdown	0	x
Irrigation & Lawn Watering	0	x
Other	0	x
Total	49335	

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

( ) Aluminum Forming

( ) Asbestos Manufacturing

( ) Battery Manufacturing

( ) Can Making

( ) Carbon Black

( ) Coal Mining

( ) Coil Coating

( ) Copper Forming

( ) Electric and Electronic Components Manufacturing

( ) Electroplating

( ) Feedlots

( ) Fertilizer Manufacturing

( ) Foundries (Metal Molding and Casting)

( ) Glass Manufacturing

( ) Grain Mills

( ) Inorganic Chemicals

( ) Iron and Steel

( ) Leather Tanning and Finishing

( ) Metal Finishing

( ) Metal Products and Machinery

( ) Nonferrous Metals Forming

( ) Nonferrous Metals Manufacturing

( ) Organic chemicals Manufacturing

( ) Paint and Ink Formulating

( ) Paving and Roofing Manufacturing

( ) Pesticides Manufacturing

( ) Petroleum Refining

( ) Pharmaceutical

( ) Plastic and Synthetic Materials Manufacturing

( ) Plastics Processing Manufacturing

( ) Porcelain Enamel

( ) Pulp, Paper, and Fiberboard Manufacturing

( ) Rubber

( ) Soap and Detergent Manufacturing

( ) Steam Electric

( ) Sugar Processing

( ) Textile Mills

( ) Timber Products

Give a brief description of all operations at this facility:

MANUFACTURING OF COSMETIC PRODUCTS, PRIMARLY WATER & SOLVENT BASED LIQUIDS SUCH AS MASCARA, LIQUID MAKEUP, MAKEUP REMOVERS, etc; POWDER PRODUCTS SUCH AS FOUNDATIONS, EYE SHADOWS, POWDER BLUSHES & FILLING OF FINGERNAIL POLISH

SIC Number and Classification 2844 PERFUMES, COSMETICS & OTHER TOILET PREPARATIONS

Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics.

NO

Briefly describe these changes and their effects on the wastewater volume and characteristics.

N/A

Is any form of wastewater treatment practiced at this facility? Describe.

Yes, DISSOLVED AIR FLOATATION TREATMENT OF INDUSTRIAL WASTEWATER FOR REMOVAL OF SUSPENDED SOLIDS & pH CONTROL

Is any form of wastewater treatment or changes to existing wastewater treatment planned for this facility within the next three years. If yes, describe.

NO

Describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer. Please include estimated completion dates.

NONE

Facility Operation

Shift Information: 24 HOURS / 7 DAYS A WEEK

Is the business activity continuous or seasonal. CONTINOUS

Is the facility discharge continuous or seasonal. CONTINIOUS

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

NO

List types and amounts of raw materials used or planned for use.

POWDERS, WAXES, PIGMENTS, NAIL ENAMEL, ALCOHOLS, SILICONES, PETROLEUM BASED SOLVENTS & MATERIALS

See ATTACHED "RAW MATERIAL LISTINGS" - APPENDIX "A"

List types and quantity of chemicals used or planned for use.

ACETONE, CLEANING SOLUTIONS, OILS & GREASES

See ATTACHED "CHEMICAL LISTING" - APPENDIX "B"

Amount of wastewater discharged per day 35000 gal monthly 1065300 gal

Do you have an accidental spill prevention plan to prevent spills of chemicals or slug discharges from entering the Control Authority's collection system? If yes, Please attach.

YES, SEE ATTACHED EMERGENCY ONE PLAN

Describe any previous spill events and remedial measures taken to prevent their reoccurrence.

N/A

A-3f

Schematic Flow Diagram: For each major activity in which wastewater is or will be generated, draw a diagram of the flow of materials, products, water, and wastewater from the start of the activity to its completion, showing all unit processes. Indicate which processes use water and which generate wastestreams. Include the average daily volume and maximum daily volume of each wastestream (new facilities may estimate). Number each unit process having wastewater discharges to the sewer.

See Attached Dwg B-033

Is any form of wastewater treatment practiced at this facility? X Yes _____ No

Is any form of wastewater treatment or changes to a existing wastewater treatment planned for this facility within the next three years? _____ Yes, Describe

_____

_____

_____

No X

Attach a process flow diagram for each existing treatment system. Include process equipment, by-products, by-products disposal method, waste and by-product volumes, and design and operating conditions. SEE Attached Dwg B-038.E

Describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer. Please include estimated completion dates.

NONE

_____

_____

_____

Building Layout – Draw to scale the location of each building on premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram), public sewers, and each facility sewer line connected to the public sewer A blueprint or drawing of the facilities showing the above items may be attached in lieu of submitting a drawing on this sheet. SEE Attached Dwg B-033

Spill Prevention:

Do you have chemical storage containers, bins, or ponds at your facility (X) Yes ( ) No If yes, give a description of their location, contents, size, type, and frequency and method of cleaning. Also indicate in a diagram or comment on the proximity of these containers to a sewer or storm drain. Indicate if buried metal containers have cathodic protection.

Do you have floor drains in your manufacturing or chemical storage areas ( ) Yes (X) No.

If you have chemical storage containers, bins, or ponds in manufacturing area, could an accidental spill lead to a discharge to: (Check all that apply)

(X) on-site disposal system

( ) Public sanitary sewer system (e.g., through a floor drain)

( ) Storm Drain

( ) To ground

( ) Other, specify: _____

( ) Not applicable, no possible discharge to any of the above routes.

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

WASTE GENERATED	QUANITY (per year)	DISPOSAL METHOD
Sludge	240 tons	Composting

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

If yes, please list SPCC, SWPPP, ADEQ Minor Source AIR Permit #778-AR-11

Does your facility practice any Pollution Prevention Activities (such as water reclamation, source reduction, good housekeeping, etc) If yes, please describe. YES, Source Reduction Projects, Equipment Changes, Cleaning Procedures Changes, GMP

Authorized Representative Statement:

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

Kay Mueller
Name

Environmental Manager
Title

Kay Mueller
Signature

5/20/08
Date

A-31

Company Name: Koppers Inc.
Sic Number: 2491
Classification: Wood Preserving
Permit number: 2012080117

Attachment A 4

NORTH LITTLE ROCK WASTE WATER UTILITY

WASTEWATER DISCHARGE PERMIT

Permittee/User - Company Name: **KOPPERS INC.**

Standard Industrial Classification Number (SIC): **2491**

Standard Industrial Classification: **WOOD PRESERVING**

Permit Number: **2012080117**

Effective Date: **SEPTEMBER 1, 2008**

Expiration Date: **AUGUST 31, 2012**

Facility Address: **2201 EDMONDS STREET, NORTH LITTLE ROCK, AR 72117**

Mailing Address: **P O BOX 15490, LITTLE ROCK, AR 72231**

Local Company Officer: **BRAD MAXEY, PLANT MANAGER**

Phone Number of Local Company Officer: **(501) 945-4581 FAX# (501) 955-9574**

In accordance with the City of North Little Rock Pretreatment Ordinance and 40 CFR 403, you are hereby authorized to discharge industrial/commercial wastewater from the above-identified facility into the North Little Rock Waste Water System. The Permittee/User must comply with all applicable Federal, State, and Local Pretreatment Standards or Requirements. The Permittee/User also has the duty to reapply for permit 90 days prior to the expiration date of this permit. A violation of any permit provision is a violation of the City of North Little Rock Pretreatment Ordinance and may subject the Permittee/User to enforcement action.

NORTH LITTLE ROCK WASTE WATER UTILITY

Gary Mills

Gary Mills
Director

Company Name: Koppers Inc.
Sic Number: 2491
Classification: Wood Preserving
Permit number: 20120801 17

SECTION 1 – DEFINITIONS

AUTHORITY – The North Little Rock Waste Water Utility.

BOD / BIOCHEMICAL OXYGEN DEMAND – The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedures, five (5) days at twenty (20) degrees C expressed in terms of mass and concentration [milligrams per liter (mg/l)].

BMP s / BEST MANAGEMENT PRACTICES
Means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in Section 2.1 A and B, of the Pretreatment Ordinance. BMP s include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.

COMPOSITE SAMPLE – The sample resulting from the combination of individual wastewater samples taken at selected intervals based on an increment of either flow or time.

24HC – Twenty-four hour composite sample.

DAILY MAXIMUM – The maximum allowable discharge of pollutant during a calendar day. Where Daily Maximum Limits are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where Daily Maximum Limits are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.

DIRECTOR – The Director of the North Little Rock Waste Water Utility, who shall be the authorized administrative representative of the Wastewater Treatment Committee.

DISCHARGE MEASUREMENT – The determination of the quantity of waste water flowing per unit of time in the sewer system at a given point by means of a current meter, rod float, weir , Pitot tube, or other measuring device or method.

FOG – For the purpose of this permit the definition is. Fats, Oils and Greases / measurement of concentration in wastewater.

FLOW METER – shall mean a weir, meter or flume or other device, which will measure and record the volume of wastewater discharged.

GRAB SAMPLE – A sample which is taken from a waste stream on a one-time basis without regard to the flow in the waste stream and without consideration of time.

GPD – Wastewater flow in gallons per day.

INSTANTANEOUS LIMIT – The maximum concentration of a pollutant allowed to be discharged at any time, determined from the analysis of any discrete or composited sample collected, independent of the industrial flow rate and the duration of the sampling event.

MAY – Permissive or discretionary.

MONITORING DEVICE – Any equipment which specifically measures and/or samples wastewater.

MONTHLY AVERAGE – The arithmetic mean of the values for effluent samples collected over a calendar month.

PERMITTEE /USER Any person discharging into the North Little Rock Waste Water Utility System under the provisions of a Wastewater Discharge Permit issued by the North Little Rock Waste Water Utility.

pH- A measure of the acidity or alkalinity of wastewater.

POTW – Publicly Owned Treatment Works of the City of North Little Rock. (The North Little Rock Waste Water Utility)

PRETREATMENT COORDINATOR – Superintendent of Treatment, North Little Rock Waste Water Utility.

PRETREATMENT – The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to or in lieu of introducing such pollutants into the POTW. This reduction or alteration can be obtained by physical, chemical or biological processes, by process changes, or by other means, except by diluting the concentration of the pollutants unless allowed by an applicable pretreatment standard.

A-4c

PRETREATMENT FACILITY – The structures, equipment, and processes required to collect, treat, and transport wastewater.

SAMPLER – A device used with or without flow measurement to obtain an aliquot portion of water or waste water for analytical purposes. May be designed for taking single sample (grab), composite sample, continuous sample, or periodic sample.

SAMPLING STATION – A specified site where monitoring takes place on a regular basis.

SHALL – Mandatory

SIGNIFICANT NONCOMPLIANCE (40 CFR 403.8(F)(2)(VIII) – For the purpose of this provision, an industrial user is in significant noncompliance if its violation meets one or more of the following criteria:

(1) **CHRONIC VIOLATIONS** of wastewater discharge limits, defined here as those in which sixty-six (66) percent or more of all measurements taken for the same pollutant parameter during a six month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including Instantaneous Limits.

(2) **TECHNICAL REVIEW CRITERIA (TRC) VIOLATION:** defined here as those in which thirty-three (33) percent or more of wastewater measurements taken for each pollutant parameter during a six month period equals or exceeds the product of the numeric Pretreatment Standard or Requirement including Instantaneous Limits multiplied by the applicable criteria (1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH).

(3) Any other violation of a Pretreatment Standard or Requirement (Daily Maximum, long-term average, Instantaneous Limit, or narrative standard) that the Utility determines has caused, alone or in combination with other discharges, Interference or Pass Through, including endangering the health of POTW personnel or the general public.

(4) Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the Utility's exercise of its emergency authority to halt or prevent such discharges.

(5) Failure to meet within 90 days after the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance.

(6) Failure to provide, within 30 days after the due date any required reports including baseline monitoring reports, 90 day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedule.

(7) Failure to accurately report noncompliance.

(8) Any other violation(s) which may include a violation of Best Management Practices, which the Utility determines will adversely affect the operation or implementation of the local pretreatment program.

SLUG LOAD or **SLUG DISCHARGE** – Any discharge at a flow rate or concentration, which could cause a violation of the prohibited discharge standards. A Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, Local Limits or Permit conditions.

TREATMENT (TREAT) – A process to which waste water is subjected in order to remove or alter its objectionable constituents and thus render it less offensive or dangerous.

TREATMENT PLANT – That portion of the POTW designed to provide treatment of sewerage and industrial waste

(TSS) TOTAL SUSPENDED SOLIDS – The total suspended matter that floats on the surface of, or is suspended in water, wastewater, or other liquid, and which is removable by laboratory filtering.

UPSET – An exceptional incident in which a Discharger unintentionally and temporarily is in a state of noncompliance with the standards set forth due to factors beyond the reasonable control of the Discharger, and excluding noncompliance caused by operations errors, improperly designed treatment facilities, lack of preventive maintenance, or careless or improper operation thereof.

USER-DISCHARGER – Any person discharging into the North Little Rock Waste Water System.

WASTEWATER – Liquid and water-carried industrial wastes, and sewage from residential dwellings, commercial building, industrial and manufacturing facilities, and institutions, whether treated or untreated, which are contributed to the POTW.

WASTEWATER DISPOSAL – The act of disposing of waste water by discharging to the North Little Rock Waste Water Treatment Facilities.

WASTEWATER TREATMENT COMMITTEE – Shall mean the Wastewater Treatment Committee of the City of North Little Rock, Arkansas, and shall mean that public authority created by Ordinance No. 3096, as amended, of the City of North Little Rock, Arkansas, and Act 132 of 1933 of the General Assembly of the State of Arkansas for the purpose of operating, maintaining, and controlling the public sanitary sewers within its jurisdiction.

WEEKLY AVERAGE – The arithmetic mean of the values for effluent samples over a period of 7 consecutive days.

SECTION 2 – GENERAL CONDITIONS

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

The Permittee/User must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatement.

The Permittee/User shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.
The Director may modify the wastewater discharge permit for good cause including, but not limited to, the following:

1. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements.

2. To address significant alterations or additions to the Permittee/User's operation, processes, or wastewater volume or character since the time of wastewater discharge permit issuance.

3. A change in the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge.

4. Information indicating that the permitted discharge poses a threat to the Utility's POTW, Utility personnel, or the receiving waters.

5. Violation of any terms or conditions of the wastewater discharge permit.

6. Misrepresentations or failure to fully disclose all relevant facts in the wastewater discharge permit application or in any required reporting.

7. Revision of or a grant of variance from categorical pretreatment standards pursuant to 40 CFR 403.13.

8. To correct typographical or other errors in the wastewater discharge permit.

9. To reflect a transfer of the facility ownership and/or operation to a new owner/operator.

The filing of a request by the Permittee/User for a wastewater discharge permit modification does not stay any wastewater discharge permit conditions.

Wastewater discharge permits may be reassigned or transferred to a new owner and/or operator only if the Permittee/User gives at least 30 days advance notice to the Director and the Director approves the wastewater discharge permit transfer. The notice to the Director must include a written certification by the new owner and/or operator which:

1. States that the new owner and/or operator has no immediate intent to change the facility's operations and processes.

2. Identifies the specific date on which the transfer is to occur.

3. Acknowledges full responsibility for complying with the existing wastewater discharge permit.

Failure to provide advance notice of a transfer renders the wastewater discharge permit violable on the date of facility transfer.

Any person including the Permittee/ User, may petition the Utility to reconsider the terms of a waste water discharge permit within 30 days of its issuance.

This permit may be revoked for the following reasons:

1. Failure to notify the Utility of significant changes to the wastewater prior to the changed discharge.

2. Failure to provide prior notification to the Utility of changed conditions pursuant to Section 6.5 of the Pretreatment Ordinance.

3. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application.

4. Falsifying self-monitoring reports.

5. Tampering with monitoring equipment.

6. Refusing to allow the Utility timely access to the facility premises and records.

7. Failure to meet effluent limitations.

8. Failure to pay fines.

9. Failure to pay sewer charges

10. Failure to meet compliance schedules.

11. Failure to complete a wastewater survey, or the wastewater discharge permit applications.

12. Failure to provide advance notice of the transfer of a permitted facility.

13. Violation of any pretreatment standard or requirement, or any terms of this permit or the North Little Rock Pretreatment Ordinance.

This permit shall be void upon nonuse, cessation of operations, or transfer of business ownership. This permit becomes void upon the issuance of a new permit.

To apply for wastewater discharge permit reissuance, submit a competed **Wastewater Discharge Permit Application** in accordance with Section 4.5 of the Pretreatment Ordinance a minimum of 90 days prior to the expiration of this permit. **(Attachment 1)**

SECTION 3 – PROBHIBITED DISCHARGES

Reports of Potential Problems - Discharges

A. In the case of any discharge, including, but not limited to, accidental discharges, discharges of a non-routine, episodic nature, a non-customary batch discharge, a Slug Discharge or Slug Load, that might cause potential problems for the POTW, the Permittee/User shall immediately telephone @ 501-945-7186, and notify the Utility of the incident. **(Attachment 2) Accidental Spill Report** This notification shall include the location of the discharge, type of waste, concentration and volume, if known, and corrective actions taken by the Permittee/User.

B. Within five (5) days following such discharge, the Permittee/User shall, unless waived by the Director, submit a detailed written report describing the cause(s) of the discharge and the measures to be taken by the Permittee/User to prevent similar future occurrences. Such notification shall not relieve the Permittee/User of any expense, loss, damage, or other liability which might be incurred as a result of damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the Permittee/User of any fines, penalties, or other liability which may be imposed pursuant to the City of North Little Rock Pretreatment Ordinance.

C. A notice shall be permanently posted on the Permittee/User's bulletin board or other prominent place advising employees who to call in the event of a discharge described in paragraph A, above. Employers shall ensure that all employees, who could cause such a discharge to occur, are advised of the emergency notification procedure.

D. Permittee/User's are required to notify the Utility immediately of any changes at its facility affecting the potential for a Slug Discharge.

Bypass

A. For the purpose of this Permit,

(1) Bypass means the intentional diversion of wastestreams from any portion of a Permittee/Users treatment facility.

(2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

A-4j

B. A Permittee/User may allow any bypass to occur which does not cause Pretreatment Standards or Requirements to be violated, but only if it also is essential maintenance to assure efficient operation. These bypasses are not subject to the provision of paragraphs (C) and (D) of this Section.

C. Bypass Notifications

(1) If a User knows in advance of the need for a bypass, it shall submit prior notice to the POTW, at least ten (10) days before the date of the bypass, if possible.

(2) A Permitte/User shall submit oral notice to the POTW of an unanticipated bypass that exceeds applicable Pretreatment Standards within twenty-four (24) hours from the time it becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the Permittee/User becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the bypass. The POTW may waive the report on case by case basis if the oral report has been received within twenty-four (24) hours.

D. Bypass

(1) Bypass is prohibited, and the POTW may take an enforcement action against a Permittee/User for bypass, unless;

(a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
(b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated waste, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
(c) The Permittee/User submitted notices as required under paragraph (C) of this Section.

(2) The POTW may approve an anticipated bypass, after considering its adverse effects, if the POTW determines that it will meet the three conditions listed in paragraph (D)(1) of this Section.

Company Name: Koppers Inc.
Sic Number: 2491
Classification: Wood Preserving
Permit number: 20120801 17

Probhibited Discharges Standards

A. General Prohibitions. No Permittee/User shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes Pass Through or Interference. These general prohibitions apply to all Users of the POTW weather or not they are subject to categorical Pretreatment Standards or any other National, State, or local Pretreatment Standards or Requirements.

B. Specific Prohibitions. No Permittee/User shall introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:

1. Pollutants which cause a fire or explosive hazard in the municipal wastewater collection and POTW, including, but not limited to, waste streams with a closed-cup flashpoint of less than 140 degrees F (60 degrees C) using the test method specified in 40 CFR 261.21.

2. Wastewater having a pH less than 5.0 or more than 11.0, or otherwise causing corrosive structural damage to the POTW or equipment.

3. Solid or viscous substances in amounts which will cause obstruction of the flow in the POTW resulting in interference, but in no case solids greater than ½ inch in any dimension.

4. Pollutants, including oxygen demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW.

5. Wastewater having a temperature which will inhibit biological activity in the treatment plant resulting in Interference, but in no case wastewater which caused the temperature at the introduction into the treatment plant to exceed 104 degrees F (40 degrees c).

6. Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause Interference or Pass Through.

7. Pollutants which result in the presence of toxic gases, vapors or fumes within the POTW in a quantity that may cause acute worker health and safety problems.

8. Trucked or hauled pollutants, except at discharge points designated by the Utility in accordance with Section 3.4 of the City of North Little Rock Pretreatment Ordinance.

9. Noxious or malodorous liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to cause a public nuisance, a hazard to life, or to prevent entry into the sewers for maintenance and repair.

10. Wastewater which imparts color which cannot be removed by the treatment process, such as but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent thereby violating the Utility's NPDES permit. Color (in combination with turbidity) shall not cause the treatment plant effluent to reduce the depth of the compensation point for photosynthetic activity by more than 10% from the seasonably established norm for aquatic life.

11. Wastewater containing any radioactive wastes or isotopes except in compliance with applicable State or Federal regulations.

12. Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, noncontact cooling water, and unpolluted industrial wastewater, unless specifically authorized by the Director.

13. Sludges, screenings, or other residue from the pretreatment of industrial wastes.

14. Medical wastes, except as specifically authorized by the Director in a wastewater discharge permit.

15. Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail toxicity test.

16. Detergents, surface-active agents, or other substances which may cause excessive foaming in the POTW.

17. Fats, oils or greases of animal or vegetable origin in concentrations greater than 100 mg/L.

Pollutants, substances, or wastewater prohibited by this Section shall not be processed or stored in such a manner that they could be discharged to the POTW. All floor drains located in process or materials storage areas must discharge to the Permittee/User's pretreatment facility before connecting with the POTW.

Company Name: Koppers Inc.
Sic Number: 2491
Classification: Wood Preserving
Permit number: 20120801!7

SECTION 4 – EFFLUENT LIMITATIONS

This Permittee/User is authorized to discharge process wastewater to the North Little Rock Waste Water Sewer System from the outfall listed below:

Description and location of permitted discharge outfall: Monitoring/Sampling Point is the Wastewater Discharge Pipe located in the Sampling Station, concrete block building on Southeast corner of facility complex across the railroad tracks from Atkinson St.

During the duration of this permit the discharge from the outfall shall not exceed the following effluent limitations. In addition, the discharge shall comply with all other applicable Federal, State and Local Pretreatment Standards or Requirements.

PARAMETER	DAILY MAXIMUM
Flow	65,000 GPD

PARAMETER	INSTANTANEOUS LIMIT & DAILY MAXIMUMS
pH	6.0 / 9.0
Temperature	65 C
BOD	1000 mg/l
TSS	1000 mg/l
FOG	100 mg/l
Arsenic	4.0
Cadmium	Report
Chromium	4.0
Copper	5.0
Lead	Report
Mercury	Report
Molybdenum	Report
Nickel	Report
Silver	Report
Thallium	Report
Zinc	Report

Company Name: Koppers Inc.
Sic Number: 2491
Classification: Wood Preserving
Permit number: 2012080117

SECTION 5 – MONITORING REQUIREMENTS

Sampling shall be conducted at the permitted outfall location identified in Section 4 of this permit.

PARAMETER	FREQUENCY	SAMPLE TYPE
Flow	Continuous	Continuous
BOD	One/month	24HC
TSS	One/month	24HC
FOG	One/month	Grab
pH	One/month	Grab
Temperature	One/month	Grab
Arsenic	One/February	24HC
	One/August	24HC
Cadmium	One/February	24HC
Chromium	One/February	24HC
	One/August	24HC
Copper	One/February	24HC
	One/August	24HC
Lead	One/February	24HC
Mercury	One/February	24HC
Molybdenum	One/February	24HC
Nickel	One/February	24HC
Silver	One/February	24HC
Thallium	One/February	24HC
Zinc	One/February	24HC

Sampling and analysis of these samples shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendment thereto.
If the Permittee/User monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR 136, the results shall be included on the Discharge Monitoring Report Form.

Flow measurement is by Wastewater Effluent Discharge Flow Meter located in the Monitoring/Sampling Station. Daily flow readings shall be recorded on Flow Monitoring Report Form and submitted to the Utility no later than the fifteenth day of the month.

A-40

Company Name: Koppers Inc.
Sic Number: 2491
Classification: Wood Preserving
Permit number: 2012080117

Compliance Monitoring

Right of Entry: Inspection and Sampling

The Utility shall have the right to enter the premises of any Permittee/User to determine weather the User is complying with all requirements of the City of North Little Rock Pretreatment Ordinance and any wastewater discharge permit or order issued hereunder. Permittee/Users shall allow the Director or his representatives ready access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and performance of any additional duties.

A. Where a Permittee/User has security measures in force which require proper identification and clearance before entry into its premises, the Permittee/User shall make necessary arrangements with its security guards so that, upon presentation of suitable identification, personnel from the Utility, State, and EPA shall be permitted to enter without delay for the purposes of performing specific responsibilities.

B. The Utility, State, and EPA shall have the right to set up on the Permittee/User's property, or require installation of, such devices as are necessary to conduct sampling and/or metering of the Permittee/User's operations.

C. The Utility may require the Permittee/User to install a sampling/monitoring station and equipment as necessary, the Utility shall have safe and unrestricted access to the sampling/monitoring station at all times. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the Permittee/User at its own expense. All devices used to measure wastewater flow and quality shall be calibrated every six (6) months to ensure their accuracy.

D. Any temporary or permanent obstruction to safe and easy access to the facility to be inspected and/or sampled shall be promptly removed by the Permittee/User at the written or verbal request of the Director and shall not be replaced. The cost of clearing such access shall be born by the Permittee/User.

E. Unreasonable delays in allowing Utility personnel access to the Permittee/User's premises shall be a violation of this ordinance.

All 24 hour composite samples, including self-monitoring will be regulated by the Utility. When you need a split sample for your lab, attach the red tag (furnished by the Utility) on the outside of the refrigerated sampler. If a sample is not needed, place the red tag inside the refrigerated sampler.

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 outfall specified in this permit, and unless otherwise specified, before the effluent joins or is diluted by other waste streams, body of water or substance. All equipment used for sampling and analysis must be routinely calibrated and inspected and maintained to ensure their accuracy. Monitoring points shall not be changed without notification to and the approval of the Utility.

Flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed and calibrated at least every six months or as required, and maintained to ensure 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. Device shall be of the non-resettable type and have a battery backup. Anytime device is reset, documentation must be submitted to the Utility stating reason for such action. This shall be allowed only for a valid reason.. If this occurs on a regular basis, you will be required to install a backup measuring device.

SECTION 6 – REPORTING AND RECORDS

All applications, reports, or information submitted to the Utility shall be signed and certified as required in Section 7.

Self-Monitoring lab analyses results shall be summarized and reported on a DMR **Discharge Monitoring Report** Form (**Attachment 3**) once per month. This report shall include the following items for the calendar month: Discharge Monitoring Report, Original Lab analyses sheets, Original chain of custody sheets, Original Calibration documents. If the Permittee/User monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR 136, the results shall be included on the Discharge Monitoring Report Form. If Best Management Practices are required, they are to be submitted with the DMR. **This report is due at the office of the North Little Rock Waste Water Utility on or before the fifteenth day of the month.**

Company Name: Koppers Inc.
Sic Number: 2491
Classification: Wood Preserving
Permit number: 2012080117

Flow readings are to be taken daily and logged on the **Flow Monitoring** Form **(Attachment 4). This report is to be received at the office of North Little Rock Waste Water Utility on or before the fifteenth day of the month.**

Calibrations Wastewater Effluent Discharge Flow Metering equipment is to be calibrated every six months. Calibration documents are to be submitted to the Utility.

Recordkeeping The Permittee/User shall retain, and make available for inspection and copying, all records of information obtained pursuant to any monitoring activities required by this permit, any additional records of information obtained pursuant to monitoring activities undertaken by the Permittee/User independent of such requirements, and documentation associated with Best Management Practices. Calibrations and maintenance records for monitoring equipment. Copies of all reports required by this permit, and records of all data used to complete the permit application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Utility at any time.
All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Utility shall be retained and preserved by the Permittee/User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

Records of sampling information shall include the following:

1. The date, exact place, time, and methods of sampling or measurement, and sample preservation techniques or procedures.

2. Who performed the sampling or measurement.

3. The date(s) analyses were performed.

4. Who performed the analyses.

5. The analytical techniques or methods used.

6. The results of such analyses.

Company Name: Koppers Inc.
Sic Number: 2491
Classification: Wood Preserving
Permit number: 2012080117

All reports required by this permit shall be submitted to the following address:

North Little Rock Waste Water Utility
Industrial Department
P O Box 17898
North Little Rock, AR 72117-0898

The Permittee/ User shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. Such notification must include the name of the hazardous waste as set forth in 40 CFR part 261, the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the Permittee/User discharges more than 100 kilograms of such waste per calendar month to the POTW, the notification shall also contain the following information to the extent such information is known and readily available to the Permitte/User. An identification of the hazardous constituents contained in the wastes, an estimation of the mass and concentration of such constituents in the wastestream discharged during that calendar month, and an estimation of the mass and concentration of such constituents in the wastestream discharged during that calendar month, and an estimation of the mass of constituents in the wastestream expected to be discharged during the following twelve months. All notifications must take place within 180 days of the effective date of this rule. Permittee/Users who commence discharging after the effective date of this rule shall provide the notification no later than 180 days after the discharge of the listed or characteristic hazardous waste. Any notification under this paragraph need be submitted only once for each hazardous waste discharged. However, notifications of changed discharges must be submitted under 40 CFR 403.12 (j) The notification requirement in this section does not apply to pollutants already reported under self-monitoring requirements of 40 CFR 403.12 (b), (d), and (e).

SECTION 7 – SIGNATORY REQUIREMENTS

Knowingly making any false statement on any report or document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under criminal laws proceedings as well as being subjected to civil penalties and injunctive relief.

All applications, reports, or information submitted to the Utility shall be signed and certified as follows:

1. All permit applications shall be signed by a corporate officer or other persons performing a similar policy or decision-making function.

2. All applications, correspondence, reports, and self-monitoring may be signed by a duly authorized representative of the person described above. A person is a duly authorized representative only if:

    (a) The authorization is made in writing by a person described above.

    (b) The authorization specifies 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. The individual shall be a legal resident and reside within the State of Arkansas.

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.**

Company Name: Koppers Inc.
Sic Number: 2491
Classification: Wood Preserving
Permit number: 2012080117

SECTION 8 – SAMPLING / MONITORING STATION

Sampling / Monitoring station is required, it shall contain the following items:

1. Utility approved building large enough to house the automatic sampler and other monitoring equipment, the sampling station is to be heated to prevent freezing of samples and monitoring equipment during cold weather months. Minimum size sampling station is 68 inches wide by 68 inches deep by 84 inches high.

2. Light with switch.

3. Duplex electrical receptacle.

4. Adequate fresh air ventilation, (exhaust fan if needed).

5. Unrestricted, safe and convenient means of access to sampling station and from sampling station access to the regulated/permitted wastestream.

6. Utility approved effluent discharge flow meter with totalizer readings in gallons or the option of using Central Arkansas Water incoming (water-meter) readings.

7. Utility approved Automatic Refrigerated Sampler.

A - 4u

SECTION 9 – EQUIPMENT OPERATIONS AND MAINTENANCE

The Permittee/User shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the Permittee/User to achieve compliance with the conditions of this permit. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the condition of the permit. **Automatic samplers shall be in a functional working order at all times that there is a wastewater effluent from the Permittee/User.**

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of waste water shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

SECTION 10 – ENFORCEMENT

The Utility shall publish annually, in a newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW, a list of the Permittee/User's which, at the time during the previous twelve (12) months, were in Significant Noncompliance with applicable Pretreatment Standards and Requirements. See Section 1 – Definitions for Significant Noncompliance.

Permittee/User who is found to have violated or continues to violate an order of the City or the Waste Water Treatment Committee or the Director, or who negligently fails to comply with any provisions of the Pretreatment Ordinance, or orders, rule, regulations and permits issued thereunder, may, upon recommendation by the Waste Water Treatment Committee to the City Council, be fined not more than One Thousand Dollars ($1,000) for each offense [See Pretreatment Ordinance Sections 10 and 11]

Pursuant to 40 CFR 403.8, as part of the Pretreatment Program, the Utility has developed an **Enforcement Response Plan** which sets forth detailed procedures how the Utility will investigate and respond to instances of noncompliance with any applicable program requirements. **(Attachment 5)**

A-4v

Attachment A-5

NORTH LITTLE ROCK WASTE WATER UTILITY

September 8, 2008 Cert. No. 7007 1490 0003 3813 6073

Koppers Industries
Attn: Brad Maxey
P.O. Box 15490
Little Rock, AR 72231

RE: Annual Inspection Wastewater Discharge Permit # 2005090118

Dear Mr. Maxey:

North Little Rock Wastewater Utility has conducted the annual on-site inspection of your N.L.R. facility on August 22, 2008. No permit violations were noted.

If you should need additional information, contact me or a member of my staff at (501) 945-7186.

NORTH LITTLE ROCK WASTE WATER UTILITY

Emric F. Roll
Pretreatment Coordinator

Ed Toland
Pretreatment Supervisor

Enclosure: Copy of facility inspection worksheets

7400 BAUCUM PIKE
PHONE (501) 945-7186
FAX (501) 945-2367

NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

Facility Information

Facility Name: Koppers Industries	Site Address: 2201 Edmonds St.
Phone Number:(s) 945-6424	NLR AR 72117
Extensions:	Mailing Address: P.O. Box 15490
Fax Number:	(If Different): Little Rock Ar. 72231

If the facility has a district and/or corporate office please provide the mailing address, phone number, and contact person:

District Office Name:	Corporate Office Name: Koppers Inc.
Address:	Address: 436 7th av. Ste. 1650
	Pittsburgh, PA. 15219
Telephone No.:	Telephone No.: (412) 227-2001
Fax No.:	Fax No.:
Contact Person/Title: John Launius, SH&E Coord.	Corporate CEO:

Water Works Account Numbers: 00245706-10

Principal Product/Service: Wood preserving / Railroad ties

Industrial Classification:	☑ Federal Category	☐ Significant	☐ Nonsignificant	☐ Landfill

If Federal Category, list standards and applicable subcategories:

Table of Contents

Comments :

Industrial Inspector's Name (Print): Mitch Foreman	Signature: Mitch Foreman

Date and Time Inspection Ended: 8-22-08 1400hrs

Route to Pretreatment Supervisor

NLRWWU INDUSTRIAL PRETREATMENT
INSPECTION FORM

I. Summary of Inspection

A. Type of Inspection and Objective (Complete Before Inspection)

Type of Inspection, √ if yes:

☐ Permit Renewal (Annual)	☐ Off Year (Annual)	☐ Spill/Slug (Demand)	☐ Unscheduled
☐ New Construction	☐ Noncompliance	☐ Follow-up	☐ Other

Inspection Objective(s) Ensure compliance with discharge permit, sewer use ordinance and to verify accuracy and completeness of self monitoring data.

Checklist of items to be reviewed and/or as visited √

☑ Pre-inspection Meeting	☑ Permit Conditions	☐ Safety Concerns
☑ Process Inspection	☑ Pretreatment Process(es)	☐ TOMP
☑ Chemical Storage	☑ Discharge point(s)	☑ Spills/Slug Control Plan
☑ Records Review	☐ RCRA	☐ Diversion Meter(s)
☑ IUSM sampling procedures	☑ Flow/pH Meter(s)	☐ Calibration Records
☐ MSDS Inventory List	☐ New MSDS	☐

Comments: In depth inspection of treatment facility was conducted last year. This annual visit will consist of a quick look at treatment and an in depth plant tour.

B. Inspection Analysis

Were there any deficiencies identified and noted during the inspection? ☐ Yes ☑ No

Provide a brief assessment of any deficiency in the following areas:

Records Review

Process Area

Pretreatment System

Self Monitoring Procedures

Diversion/Sewer Meters

Spill/Slug Control Plan

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 8-22-08 1300hrs

Name/Title of Representatives Attending Inspection (Include name and title for all IU representatives attending)

IU Representatives	NLRWWU Representatives
John Launius, Safety Health & Environmental Coord.	Mitch Foreman

Signatory Authority (Name & Title) Brad Maxey, Plant Manager

SIC Code(s) 2491 wood preserving

Days of Operation 7	Days of Production (if different)
Hours of Operation 24	Hours of Production (if different)

Number of Shifts: 3	Shift 1, hrs.: to	Shift 2, hrs.: to	Shift 3, hrs.: to

No. Of Employees: 80 est.	Peak Months	Low Periods

Are there any scheduled Plant Shutdowns? Yes ☐ No ☑ N/A ☐ If yes when do shutdowns occur?

Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes ☐ No ☑

If Yes, explain:

Are there any Safety Concerns or Identified Hazards that NLRWWU personnel should be aware of: ☐ Yes. ☑ No

If Yes, explain:

Last Inspection Date: 8-23-07 Have there been any changes since the last inspection of the following items:

Site/Process Flow plans? Yes ☐ No ☑ If yes, provide a copy of new plans for Permit File.

Process Type? Yes ☐ No ☑ If yes, explain:

Production Level? Yes ☐ No ☑ If yes, explain:

Use of raw materials? Yes ☐ No ☑ If yes, explain:

Amount of finished product? Yes ☐ No ☑ If yes, explain:

Approximate daily flow rates in Gallons Per Day (GPD): 30,000gpd

Are the domestic and industrial wastewater streams combined?	yes ☐	no ☑	N/A ☐
Prior to Pretreatment System?	yes ☐	no ☑	N/A ☐
Prior to connection to the POTW sanitary sewer?	yes ☐	no ☑	N/A ☐
At connection to sanitary sewer?	yes ☐	no ☑	N/A ☐
Production Verification Records for Production-Based Standards?	yes ☐	no ☐	N/A ☐

Record type, inclusive dates, production figures for production-based standards:

B. Facility Permits

Permit Type	Permit No.	Expiration Date
NLRWWU	2005090118	8-31-08
Air	1327-AR-6	Issued 1-26-06
RCRA		
NPDES (Water)	ARG550255	
Stormwater	ARR00A877	
Other		

NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM **IPP-04A**

Revised: 1-1-2006

Attachment A: Industrial Process(es)			
List Process(es) by name and check yes if it is a categorical process:			
1. Wood preserving	Yes ☑ No ☐	5.	Yes ☐ No ☐
2.	Yes ☐ No ☐	6.	Yes ☐ No ☐
3.	Yes ☐ No ☐	7.	Yes ☐ No ☐
4.	Yes ☐ No ☐	8.	Yes ☐ No ☐

Were Processes Inspected by Industrial Inspector? Yes ☑ No ☐ N/A ☐

Provide Brief Description of Process # 1

Raw material in the form of untreated lumber and cross ties is pressure treated using wood preservative.

Check Pollution Prevention Controls used in Process #1

☐ Overflow Alarms	☐ Aqueous Cleaning Solutions
☐ Spray Rinsing, Fog, or Countercurrent Rinsing	☐ Reuse Rinse Waters
☑ Dragout Collection Trays (drip track)	☐ Seal-Less Pumps
☐ Air Jets to Blow Parts Dry	☐ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☐ Water Soluble Cutting Fluids	☐ Recycle Overspray

☑ Other(s) Reclamation of preservative

Check all Sources of Wastewater Generated from Process #1

☐ Overflows	☐ Equip. Cleanup	☐ Floor Cleanup	☐ Tank Waste Solutions
☐ Product Cleaning	☐ Veh. Maintenance/Wash	☐ Tank Dragout	☑ Air Pollution Devices
☑ Boiler Blowdown	☐ Spent Rinse Tanks	☐ Equipment Coolants	☐ Cooling Water
☑ Drip track	☑ Ground water	☑ Storm water	☐

List Raw Materials, Chemicals and Container Volumes used in Process #1

Creosote solution = 5.7 million gallons per year. Wood product = 6.4 million cubic feet

Check Waste Stream Pollutants from Process #1

☑ BOD	☐ CN^-	☐ Metals (List Metal(s))	☐ Solvents (List Solvent(s))
☑ TSS	☐ Cl_2		Creosote
☑ O&G	☐ S^-		
☑ pH	☐ COD		

What is the Destination of the Wastewater from Process? Sanitary Sewer ☐ Pretreatment System ☑

Is Process #1 Wastewater Discharge? Continuous ☑ Batch ☐

If Batch, what is the Frequency, Duration, and Volume of Discharge?

Are there floor drains in the Process #1 area? ☐ Yes ☐ No, if yes list number and the location of all floor drains:

Catch basins and basement sumps.

Inspectors Name: Mitch Forteman (Print Industrial Inspector's Name Here) **Date:** 8.22.08

Attachment B: Pollution Prevention Activities		
Does the facility have a written Pollution Prevention Plan?	Yes ☑	No ☐
Does this facility practice Pollution Prevention?	Yes ☑	No ☐
Check the following Pollution Prevention Activities:		
Good Operating Procedures?	Yes ☐	No ☐
Explain:		
Spill and Leak Prevention Procedures?	Yes ☑	No ☐
Explain: Numerous inspections are conducted in the process & storage areas to identify leaks or potential sources of leaks & other conditions that could result in a release or require corrective action.		
Water Reuse?	Yes ☐	No ☐
Explain:		
Cost Accounting to Track Savings?	Yes ☐	No ☐
Explain:		
Inventory Control?	Yes ☐	No ☐
Explain:		
Employee Training?	Yes ☑	No ☐
Explain:		
Spent Solvent Reclamation?	Yes ☑	No ☐
Explain: Reclaimed by Safety-Kleen		
Recycle Paper, Alumimum, Boxes, and Pallets?	Yes ☑	No ☐
Explain: Wood waste is sent off site to be recycled		
Recycle Waste Oil, Solvents, and Lubricants?	Yes ☑	No ☐
Explain: Reclaimed by Safety-Kleen		
Other Activities		
Explain: Spill prevention, Storm water pollution prevention and Waste minimization plans have been established.		

Inspectors Name: Mitch Foreman
(Print Industrial Inspector's Name Here)

Date: 8.22.08

NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

IPP-04C
Revised: 1-1-2006

Attachment C: Pretreatment System			
Are the Industrial Wastestreams Segregated for Pretreatment? ☑ Yes ☐ No			
Are the Industrial Wastestreams Pretreated prior to Discharge to the Sanitary Sewer? ☑ Yes ☐ No			
Did the Industrial Inspector inspect the Pretreatment System? ☑ Yes ☐ No			
Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:			
☐ Air flotation	☐ Filtration	☐ Ion Exchange	☑ Biological Treatment
☐ Centrifuge	☐ Flow Equalization	☐ Ozonation	☐ Chlorinating
☐ Chemical Precipitation	☑ Oil/Water Separation	☐ Reverse Osmosis	☐ Grit Removal
☐ Cyclone	☐ Grease Trap	☐ Screen	☐ Solvent Separation
☑ pH Adjustment	☐ Sand Trap	☐ Sedimentation	☐ Silver Recovery
☑ Decanting	☐	☐	☐
Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):			
Each aspect of the treatment system was found to be in proper working order. No deficiencies in treatment system were noted.			
Does the description match the schematic currently on file? ☑ Yes ☐ No ☐ N/A			
System Operator(s) Name:			
Does discharge permit require licensed operator? ☐ Yes ☑ No ☐ N/A			
Is the System Operator(s) licensed by the State of Arkansas in accordance with Reg. # 3? ☐ Yes ☐ No ☐ N/A			
List Name(s) and License classification:			
Is training provided to the Pretreatment System Operator(s)? ☑ Yes ☐ No ☐ N/A			
If Yes, list type and frequency:			
Is the discharge from the Pretreatment System? ☐ Batch ☑ Continuous ☐ Both:			
If any discharges are batch type, describe the following:			
Volume of each batch gal			
Number of batches discharged per time			
Approximate duration of batch discharge			

Date: 8.27.08
Page 6 **of** 10

Attachment C: Continued

Are operational and maintenance records kept for Pretreatment System? ☑Yes ☐No ☐N/A

Did Industrial Inspector review these records? ☐Yes ☐No ☐N/A

List type of Meters used in the Pretreatment System: (Include all pH and flows)

Meter Type	Model & S/N	Calibration Procedure and Frequency	Comments (Totalizer Reading)
PH	Rosemont 5081	3 point / 6mo.	
Flow	Badger	6 mo.	Calibrations & controls
			10690 Hinds Rd
			Benton Ar. 72015

Are there obvious means to by-pass the Pretreatment System? ☐Yes ☑No ☐N/A

If yes, have there been any by-passes to the sanitary sewer in the past year? ☐Yes ☐No ☑N/A

Is there potential for discharge during a power outage? ☐Yes ☑No ☐N/A

Are there alarm systems to alert the Operator of Problems with the System? ☐Yes ☑No ☐N/A

Does the facility generate Hazardous Waste as a result of the basic process or pretreatment?
☐Yes ☑No ☐N/A

If yes, List Name of RCRA Contract Hauler, Address, and Phone No.

Does the facility generate Non-Hazardous Waste as a result of Basic Process or Pretreatment?
☑Yes ☐No ☐N/A

If yes, List name of Contract Hauler, Address, and Phone No.

Spent solvents reclaimed by Safety-Kleen.

Creosote reclaimed by Rineco 778-9089

Grease/Sand Trap, Oil/Water Separator Waste Disposal Records for Past Year?
☐Yes ☐No ☑N/A

If yes, List Name of Contract Hauler, Address, and Phone No.

Does the facility generate waste oil?
☐Yes ☐No ☑N/A

If yes, List Name of Contract Hauler, Address, and Phone No.

Inspectors Name: Mitch Foreman
(Print Industrial Inspection's Name Here)

Date: 8.22.08

Attachment D: Chemical Storage Area(s)

Does the facility have a designated chemical storage area? ☑ Yes ☐ No ☐ N/A

Did the Industrial Inspector inspect the Chemical Storage Area? ☑ Yes ☐ No ☐ N/A

Describe Location of Chemical Storage Area	Does it contain Floor Drains?	4if yes Discharges to?
1. next to primary treatment	☑ Yes ☐ No	☑ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3. creosote storage	☐ Yes ☑ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
5.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
6.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer

Does the Chemical Storage Area contain any of the following Control Mechanisms? (4if yes)

☑ Dikes, Berms for Containment	☐ Plugs for Floor Drains
☑ Secondary Tanks for Holding	☐ Premix (low) Concentrations
☐ Alarms	☐ Chain restraints, limited access
☑ Spills Control Kits for Cleanup	☑ Notification Procedures
☐ Chemical desegregation within Storage Area	☐ Other

Chemical Inventory List (MSDS) on file? ☑ Yes ☐ No ☐ N/A

Were any new MSDS reviewed during the Inspection? ☐ Yes ☑ No ☐ N/A

If yes, list below:

Chemical storage comments (type chemicals, handling procedures, usage, controls…)

Chemicals for treatment are small quantity (55 gal drums) for PH adjustment and applied by hand if needed.
Floor drain connected to sump.

Creosote is brought in by rail car and piped to storage tanks.

Inspectors Name: Mitch Foreman
(Print Industrial Inspector's Name Here)

Date: 8.22.08

Attachment E: Spill/Slug Control Plan	
Spill Control Plan	
Does the facility have a permit required Spill/Slug control plan?	☑ yes ☐ no ☐ N/A
If yes, 4 the following: 403.8(f)(2)(v)(A-D)	
Is the spill/slug control plan <2 years old?	☑ yes ☐ no ☐ N/A
(A) Describes discharge practices including non routine batch discharges (slug)	☑ yes ☐ no ☐ N/A
(B) Describes stored chemicals	☑ yes ☐ no ☐ N/A
(C) Procedures for immediate notification to POTW of slug discharges	☑ yes ☐ no ☐ N/A
(D) 1. Describes measures for controlling toxic organic pollutants	☐ yes ☐ no ☐ N/A
2. Describes procedures and equipment for emergency response	☑ yes ☐ no ☐ N/A
3. Describes follow-up to limit damage suffered by POTW or environment	☐ yes ☐ no ☐ N/A
4. Does the facility have the NLRWWU Spill/Slug Notification Procedures posted?	☑ yes ☐ no ☐ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	☑ yes ☐ no ☐ N/A
If no, 4 the following:	
Does the facility have the NLRWWU Spill/Slug Notification Procedures posted?	☐ yes ☐ no ☐ N/A
Is it posted in areas where chemicals are used and stored?	☐ yes ☐ no ☐ N/A
If Yes how many? 3	☐ yes ☐ no ☐ N/A
Are appropriate personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no ☐ N/A
Have there been any non-routine, episodic discharges or chemical spills in the past year?	☐ yes ☑ no ☐ N/A
(Briefly Describe, Include Dates)	
Was NLRWWU notified of these occurrences? ☐ yes ☐ no ☐ N/A	
Visual Inspection of Sanitary Sewer Line	
Observe and provide description of manhole condition and flow channel of the following:	
Process Flow Monitoring Point	
Total Flow Monitoring Point	
Upstream Manhole No.	
Point of Connection (final out-fall) Manhole no.	

Inspectors Name: Mitch Lorenz
(Print Industrial Inspector's Name Here)

Date: 8.22.08

NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

IPP-04F
Revised: 1-1-2006

Attachment F: Self-Monitoring/TOMP Requirements			
Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.			
Samples are collected by NLRWWU personnel in accordance with 40 CFR 136 and relinquished to			
American Interplex.			
Where is the sample point located? 4the following if applicable			
☐ End of Process	☐ Pretreatment Effluent	☐ Total Flow	
☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator	
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required	
☐ Safety Hazards Identified	☑ Sampling Station	☐	

Is the Sample Collection Site Adequate?	☑ Yes ☐ No ☐ N/A
Is the Sample Collection Site Used by NLRWWU Personnel?	☑ Yes ☐ No ☐ N/A
Does the facility perform self-monitoring tests in-house?	☐ Yes ☑ No ☐ N/A
If no, record the name and address of Contract Lab:	
American Interplex Inc.	
8600 Kanis Rd. Little Rock Ar. 72204	
IU Self-Monitoring Results reviewed:	☑ Yes ☐ No ☐ N/A
Is the Contract Lab certified by ADEQ for test parameters?	☑ Yes ☐ No ☐ N/A
Dates and Times of Sample Analysis Recorded?	☑ Yes ☐ No ☐ N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)	☑ Yes ☐ No ☐ N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)	☑ Yes ☐ No ☐ N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	☑ Yes ☐ No ☐ N/A
Were correct Sample Types Collected	☑ Yes ☐ No ☐ N/A
Dates and times of Sample Collection Recorded?	☑ Yes ☐ No ☐ N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	☑ Yes ☐ No ☐ N/A
Were Self Monitoring records on file for past 3 years?	☑ Yes ☐ No ☐ N/A

List the parameters the facility monitors and the frequency:

☐ Cd(t)	☐ Cu(t)	☐ Cr(t)	☐ Ni(t)	☐ Pb(t)
☐ Ag(t)	☐ Zn(t)	☑ pH (cont.)	☐ CN^-(t)	☐ CN^-(a-c)
☐ TTO-Vol	☐ TTO-B/N	☐ TTO-A.E.	☐ TTO-Pest	☐ Cr(hex)
☑ BOD 1mo.	☑ TSS 1mo.	☑ OG 1mo.	☑ Metals 1yr.	☐

Toxic Organic Management Plan (TOMP)

How does the IU report TTO?	☐ Analysis ☐ Certification Statement
Does the facility have a Toxic Organic Management Plan?	☐ Yes ☑ No ☐ N/A
If yes, Does the plan show how toxic organics are used, stored, and disposed?	☐ Yes ☐ No ☐ N/A
List the date of the last revision to the TOMP?	
Is the TOMP being followed as written?	☐ Yes ☐ No ☐ N/A (If no, provide explanation in comments.)
If no, is there evidence that a TOMP is needed?	☐ Yes ☑ No ☐ N/A (If yes, provide description of evidence in comments.)
Comments:	

Inspectors Name: Mitch Foreman (Print Industrial Inspector's Name Here)

Date: 8.22.08

ICIS NPDES: Add Inspection - Windows Internet Explorer

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

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check AutoLink AutoFill Send to Settings

ICIS NPDES: Add Inspection

Page Tools

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

Compliance Monitoring Activity Name: North Little Rock

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

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

* Linked Facility

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	20303	VALIDATE		

Compliance Monitoring Dates

Planned Start Date: 11/12/08

Planned End Date: 11/14/08

Actual Start Date: 11/12/08

Actual End Date: 11/14/08

Statutes and Sections Information

Federal Statutes : CWA - Clean Water Act

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

State Statute:

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

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

Compliance Monitoring Agency Name:

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

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

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

Which party had the lead?

Government Contacts

CONTACTS

Affiliation Type	First Name	Last Name	Phone	Office	Organization

Codes

SIC Codes:

ADD / REMOVE

NAICS Codes:

ADD / REMOVE

Priorities

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

Regional Priority: 2009 - Region 06 - Air Toxics Major Sources (O & G), 2009 - Region 06 - Brine Spills from Oil & Gas Operations, 2009 - Region 06 - CD Implementation, 2009 - Region 06 - Minor Wastewater Collection & Treatment System, 2009 - Region 06 - Petroleum Refining

Media Monitored

Media Monitored:

Compliance Monitoring Media Indicator

Multimedia Indicator: ☐

Compliance Monitoring Information

Number of Days Physically Conducting Activity: 3

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code:

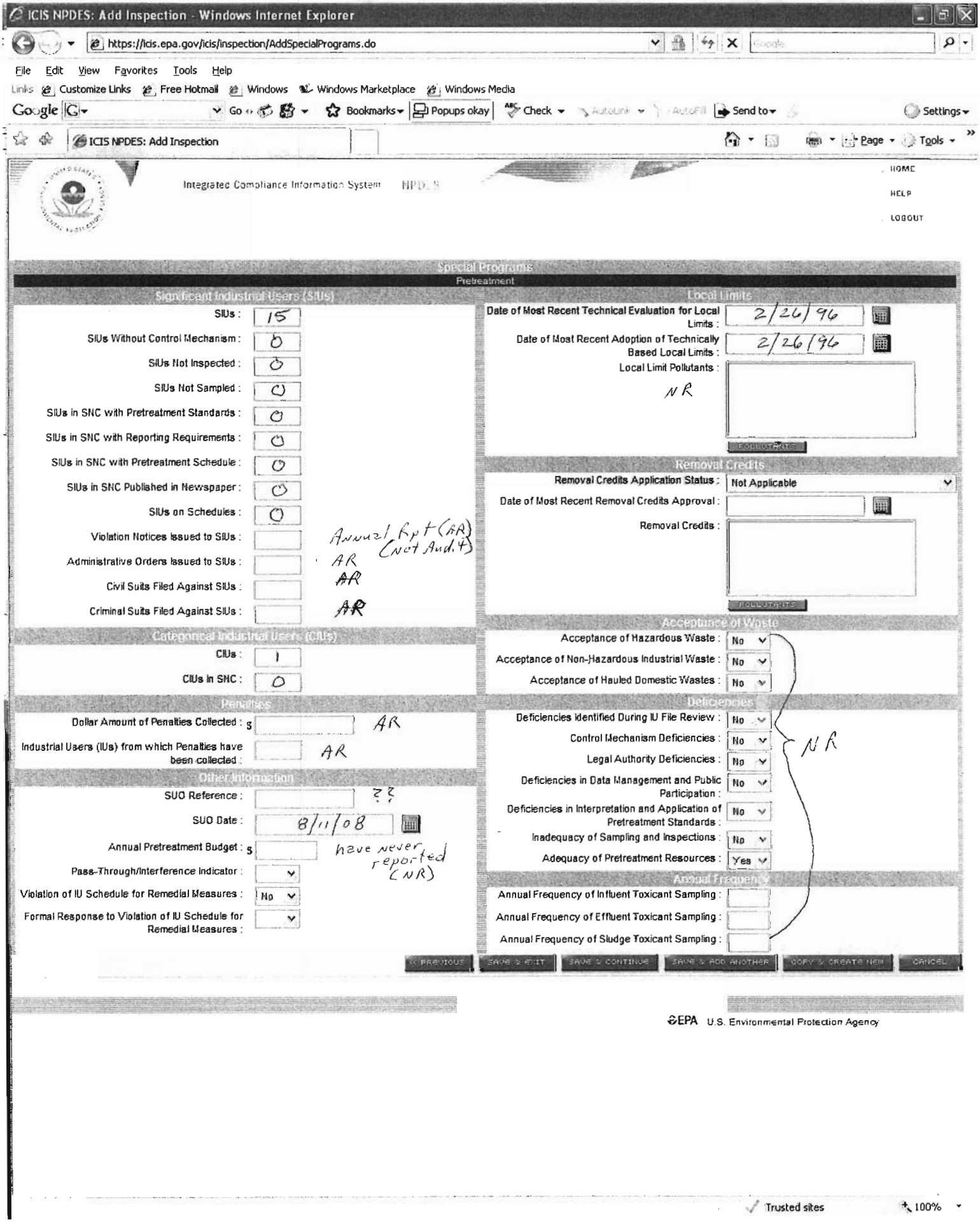
Compliance Monitoring Comments

Compliance Monitoring Comments: 04 SIU Site Visits

User Defined Fields

1: ☐

Trusted sites 100%


ICIS NPDES: Add Inspection - Windows Internet Explorer
https://icis.epa.gov/icis/inspection/AddSpecialPrograms.do
ICIS NPDES: Add Inspection
Integrated Compliance Information System NPDES
HOME
HELP
LOGOUT
Special Programs
Pretreatment
Significant Industrial Users (SIUs)
SIUs : 15
SIUs Without Control Mechanism : 0
SIUs Not Inspected : 0
SIUs Not Sampled : 0
SIUs in SNC with Pretreatment Standards : 0
SIUs in SNC with Reporting Requirements : 0
SIUs in SNC with Pretreatment Schedule : 0
SIUs in SNC Published in Newspaper : 0
SIUs on Schedules : 0
Violation Notices Issued to SIUs : Annual Rpt (AR) (Not Audit)
Administrative Orders Issued to SIUs : AR
Civil Suits Filed Against SIUs : AR
Criminal Suits Filed Against SIUs : AR
Categorical Industrial Users (CIUs)
CIUs : 1
CIUs in SNC : 0
Penalties
Dollar Amount of Penalties Collected : $ AR
Industrial Users (IUs) from which Penalties have been collected : AR
Other Information
SUO Reference : ??
SUO Date : 8/11/08
Annual Pretreatment Budget : $ have never reported (NR)
Pass-Through/Interference Indicator :
Violation of IU Schedule for Remedial Measures : No
Formal Response to Violation of IU Schedule for Remedial Measures :
Local Limits
Date of Most Recent Technical Evaluation for Local Limits : 2/26/96
Date of Most Recent Adoption of Technically Based Local Limits : 2/26/96
Local Limit Pollutants : NR
POLLUTANTS
Removal Credits
Removal Credits Application Status : Not Applicable
Date of Most Recent Removal Credits Approval :
Removal Credits :
POLLUTANTS
Acceptance of Waste
Acceptance of Hazardous Waste : No
Acceptance of Non-Hazardous Industrial Waste : No
Acceptance of Hauled Domestic Wastes : No
Deficiencies
Deficiencies Identified During IU File Review : No
Control Mechanism Deficiencies : No
Legal Authority Deficiencies : No
Deficiencies in Data Management and Public Participation : No
Deficiencies in Interpretation and Application of Pretreatment Standards : No
Inadequacy of Sampling and Inspections : No
Adequacy of Pretreatment Resources : Yes
NR
Annual Frequency
Annual Frequency of Influent Toxicant Sampling :
Annual Frequency of Effluent Toxicant Sampling :
Annual Frequency of Sludge Toxicant Sampling :
« PREVIOUS
SAVE & EXIT
SAVE & CONTINUE
SAVE & ADD ANOTHER
COPY & CREATE NEW
CANCEL
EPA U.S. Environmental Protection Agency
Trusted sites
100%