ADEQ

A R K A N S A S
Department of Environmental Quality

January 6, 2012

Mark Wilkins
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 Tracking #AR0020303; AFIN #6000274) Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Wilkins:

Please find enclosed the finished report for the audit/assessment conducted December 6th through the 8th, 2011. The report should be made available for review by appropriate officials. Discussions and an evaluation should be made concerning the findings. Please respond to the 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. They should be lauded for their dedication. In this auditor's opinion, the City's Pollution Prevention Program could be "stepped-up" as it can be a very valuable tool in eliminating or reducing toxic pollutants discharged to your wastewater treatment plants as well as saving your non-domestic dischargers water and energy usage.

Many of the audit/assessment recommendations have been, and are meant to aide your Programs to further evolve in achieving the Clean Water Act's objectives to eliminate discharge of pollutants to the environment.

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 and Pollution Prevention Programs.

Please feel free to contact this office with any questions or concerns.

Sincerely,

Allen Gilliam
NPDES Pretreatment Coordinator
(501) 682-0625

Attachments: North Little Rock's Pretreatment Program Audit/Pollution Prevention Assessment; Pretreatment Audit Checklist and Supporting Documentation (Attachments A-1 through A-6)

cc: Craig Uyeda/NPDES Enforcement Branch Manager
Eric Fleming/NPDES Inspector Branch Manager
Rudy Molina/EPA 6WQ-PO

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF NORTH LITTLE ROCK, ARKANSAS

NPDES TRACKING PERMIT #AR0020303
(COVERED PERMITS #AR0020320 & #AR0038288)

JANUARY 6, 2012

PREPARED BY: ALLEN GILLIAM

STATE PRETREATMENT COORDINATOR

ADEQ

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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 December 6th through the 8th, 2011, of the Pretreatment Program implemented by City of North Little Rock, Arkansas. Participants included:

Allen Gilliam	ADEQ/Pretreatment Coordinator
Emric Roll	City/Pretreatment Coordinator
Ed Toland	City/Pretreatment Supervisor
Mitch Foreman	City/Senior Pretreatment Technician

["The City, North Little Rock" and "NLR" may be used interchangeably throughout this document.]

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of North Little Rock's (NLR) 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.

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 review was completed of the City's "streamlining" modifications to its entire Pretreatment Program, was deemed approvable, complete and compliant with the current streamlined National Pretreatment Regulations in 40 CFR 403. The City's Pretreatment Program was incorporated into its three (3) NPDES permits by reference on 11/1/09.

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 6.02 MGD. This POTW receives approximately 0.53 MGD from 12 significant industries, 2 of which are categorical.

Sludge is sent through a belt press for dewatering. The City composted about 947 dry English tons of biosolids during 2011.

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 3.5 MGD. This POTW receives "significant" industrial wastewater (~47,000 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 screens; four (4) parallel aerated lagoons followed by chlorination prior to discharge to the Arkansas River. Its design flow is 8.5 MGD and averages 3.3 MGD with only one (1) surgical "hospital" permitted which discharges ~19,000 gpd. Its sludge is also stored, infrequently dredged and land applied on City owned property.

There has been no pattern of toxicity shown from any of the City's treatment plants as there has been neither 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 permitted industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included 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 (NLR) 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 403.8(f)(2)(i)***, "[NLR will] Identify and locate all possible Industrial Users [IUs] which might be subject to the [City's] Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the [ADEQ] upon request..."

During the Audit Checklist review it was discovered the City had sent approximately fifty (50) IU Waste Surveys (see Attch. A-1) to potential non-domestic dischargers over the last three (3) years, but no "compilation, index or inventory" could be produced.

See Section 2 of EPA's "Guidance Manual for POTW Pretreatment Program Development" and its tables at http://www.epa.gov/npdes/pubs/owm0003.pdf for more information which should be included in a master list of industrial (non-domestic) users.

This survey practice can be "ongoing", but a current master list must be made available upon request.

Other facilities the City should focus on would be the nursing homes, chiropractors, machine shops, x-ray clinics, auto body repair shops, lithographic screen printers, dentists, etc. Most of these small quantity dischargers may not be deemed significant IUs, but may have opportunities for P2 activities and best management practices (BMPs).

2) Under ***40 CFR 403.8(f)(1)(B)***, "...individual...control mechanisms must be enforceable and contain, at a minimum, the following conditions...***(3)*** Effluent limits...based on...categorical Pretreatment Standards..."

a) It was discovered during the file review that Koppers' permit limits; based on the Timber Products Processing under 40 CFR 429.95 listed the category's "Oil and Grease" parameter as "FOG" (fats, oils and grease).

   While the analysis and results for FOG may be identical to that for Oil and Grease, the parameter should remain the same as what is dictated in 40 CFR 429.95.

b) It was discovered during the file review that Caterpillar's permit limits included "Instantaneous & Daily Maximums" (see Attch. A-3n).

   The Metal Finishing Standards under 40 CFR 433 were developed on the basis of 24 hour flow-proportioned composite sampling to take into account daily fluctuations in wastewater characteristics and strength. Unless the City can historically demonstrate Caterpillar's

wastewater does not fluctuate, but remains at a static strength (in mg/l) for any parameter over a 24 hour period, remove the "Instantaneous & Daily Maximums" from their Section 4 – Effluent Limitations page and adhere to what is dictated in 40 CFR 433.17: "Maximum for any 1 day".

3) Under ***40 CFR 403.12(b)***, "...At least 90 days prior to commencement of discharge, New Sources, and sources that become Industrial Users subsequent to the promulgation of an applicable categorical Standard, shall be required to submit to [NLR] a report which contains the information listed in paragraphs (b)(1)–(5) of this section...***(3)*** Description of operations. [Caterpillar] shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by [Caterpillar]. This description should include a schematic process diagram which indicates points of Discharge to [NLR] from the regulated processes."

During the file review and subsequent site visit at Caterpillar, it was discovered a current/accurate schematic of their wastewater generating processes and flow was not on file. This made for some confusion during the site visit as this auditor could not fully understand the regulated wastewater flows from generation through pretreatment to the final discharge/sampling point. The City must require Caterpillar to submit a comprehensive, current and accurate schematic process diagram indicating wastewater flows.

4) Under ***40 CFR 433.12(a)***, "In lieu of requiring monitoring for TTO, [NLR] may allow [Caterpillar] to make the following certification statement: ''Based on my inquiry of the person or persons directly responsible for managing compliance...for...(TTO)...I further certify that this facility is implementing the toxic organic management plan submitted to [NLR].''

Caterpillar has submitted a Toxic Organic Management Plan (TOMP) to satisfy the above waiver. The City must respond in writing to Caterpillar their TOMP was approved for them to continue making the certification statement in lieu of testing for the list of toxic organics in 40 CFR 433.11(e). With no documentation in the file showing the City has approved Caterpillar's TOMP it is uncertain whether the City has even reviewed it.

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 current City Pretreatment Coordinator 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 including the industry's category (40 CFR 4XX) its limitations are covered under on the first page of their permit. In other words, Caterpillar's permit could state, "In accordance with the

City of North Little Rock Pretreatment Ordinance...and the Metal Finishing Standards in 40 CFR 433.17..." The same should be done with Koppers' permit addressing their 40 CFR 429.95 Subpart H under the Timber Products Processing category.

Obviously, these effluent guidelines (categories) should also be mentioned on their fact sheets along with the appropriate limits.

3) Recommend updating the fact sheets for the City's permitted industrial users. It was noted during the file review permitted industries' fact sheet information was vague and not succinctly comprehensive.

Although information about the City's permitted industries was scattered throughout inspections and applications, it should be digested and housed in one document. These fact sheets could 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) at http://www.epa.gov/npdes/pubs/owm0017.pdf , Appendix I for more information to include in an industry fact sheet.

Time could be saved if comprehensive fact sheets were available in the City's Pretreatment files. An interested party should be able to review an industry's fact sheet and understand its process narrative (complete with chemicals used [not trade names]) and accurate wastewater flow schematics to better understand the industry's operations without leaving the City's office.

4) Recommend clarifying what the City means by "24 HC" (24 hour composites) in its permits. 24 hour composites can either be time-proportioned or flow-proportioned. It is understood all of your sampling is flow-proportioned. Can this be so stated on the permits' definition page (see Attch. A-3b) or in the industries' monitoring requirements section to avoid any confusion?

5) Recommend asking more questions regarding chemical handling procedures on the City's inspection forms. In other words, how does the industry transfer its virgin chemicals from the loading dock to their main storage area, then to the individual work stations where they are used?

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

7) Consider submitting stories to the local newspaper (as a public service) regarding proper disposal of pharmaceuticals, grease and other household toxics. An informative article suggested is a brief description of the miles of collection system, what the City's wastewater treatment plants do and the valuable purpose it serves in protecting waters of the State safe for its designated uses.

Subsequent articles could be sent regarding proper disposal of pharmaceuticals and oil and grease capturing a larger audience than pamphlets sent out with the City's water bills.

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

There is no action required of the City regarding its Pretreatment Program or 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.

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
Date of approval/incorporation of "Streamlined" modifications: 11/1/09
Month Annual Pretreatment Report Due: March

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 12/6 - 12/8/11 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	Pretreatment Coordinator/ADEQ	501.682.0625

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Ric Roll	Pretreatment Coordinator/NLR W.W.	Same
Ed Toland	Pretreatment Supv./NLR W.W.	"
Mitch Foreman	Sr. Pretreatment Tech./NLR W.W.	"

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	4/7/11	"No violations noted"
PCI	3/5/10	"No violations noted"

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 November of 2008. 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.

Caterpillar Inc., has moved in to their building and is the only industry added to NLR's industrial permitting base. Caterpillar "Motor" Graders is covered under the Federal Metal Finishing Category (40 CFR 433.17) as it does phosphatizing prior to powder coating their finished motor grader parts.

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	10/01/10	9/30/15

* 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 (Avg)- 6.02 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 11

Industrial Contribution to this Treatment Plant

# of SIUs : 12 # of CIUs : 2
Industrial Flow (mgd): 0.526 Industrial Flow (%) : 8.73%

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: Primary contact recreation; raw water source; propagation of desirable species of fish, etc.

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.)	947 dry 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 11/30/11 there has not been any 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 its 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)
pH (6/30/11)	????

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: 1/31/12

Treatment Plant Wastewater Flow: Design- 6.6 MGD; Actual (Avg)- 3.5 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 8

Industrial Contribution to this Treatment Plant

# of SIUs : 1 (St. Vincent Med. Center) # of CIUs : 0
Industrial Flow (gpd): ~47,000 Industrial Flow (%) : 1.34 %

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: Primary contact recreation; raw water source; propagation of desirable species of fish, etc.

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 11/30/11 there has not been any 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)
BOD5 (4/30/11 &11/30/10)	????
pH (8/31 & 6/30/11)	
F.Coliform (9/30/11)	

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: 9/30/15

Treatment Plant Wastewater Flow: Design- 8.5 MGD; Actual (Avg)- 3.3 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 8

Industrial Contribution to this Treatment Plant

# of SIUs : 1 (AR. Surgical Hosp.) # of CIUs: 0
Industrial Flow (gpd): ~19,000 Industrial Flow (%): 0.57 %

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

Method of Disinfection: Chlorination

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3C

Receiving Stream Use: Primary contact recreation; raw water source; propagation of desirable species of fish, etc.

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, T.Phos and Nitrate+Nitrite Nitrogen

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: N/A
Issuance Date: "
Expiration Date: "

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

YES NO N/A

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

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) At 39% critical dilution, as of 11/31/11 there has not been any 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)
11 BOD5 exceedances from 2/28/10 thru 4/30/11	????
D.O. (7/31/11)	
F. Coliform (11/30/10)	
TRC (12/31/10)	

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 non-substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below. Required Streamlining modifications to be current with 40 CFR 403.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
11/1/09	Non-Substantial Mods hand delivered ~8/7/08 which included required mods to be current with Streamlining revisions to 40 CFR 403	11/1/09

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: 11/1/09

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

___ ✓ Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

_____ No oversight authority
_____ No inspection authority
_____ No remedies for noncompliance
_____ No "equivalent" standard
_____ No clear delineation of responsibility for program implementation
_____ Interjurisdictional agreements not entered into
_____ Other, Specify: _____

___ ✓ Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no: *St.Vincent Med. Center is in Sherwood.*

✓ ___ 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. Vincent Med. Center)			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 N/A
___ Notification of IUs
___ Permit issuance
___ Receipt and review of IU reports
___ Inspection and sampling of IUs
___ Assessment of IUs for P^2 activity
___ Analysis of samples
___ Enforcement
___ Other: _____

Briefly describe other problems: _____

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

✓ ___ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *City sent out ~30 IU Surveys during 2011. (See Attach. A-1 for example and log of "letters sent")*

___ ✓ 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?
Caterpillar Inc.	Finishing of motor graders (assembly/painting/testing)	Yes

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

a. 14 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 2 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 12 Noncategorical SIUs
d. 0 Other regulated nonsignificant IUs (Describe)_____
14 TOTAL of a. + d.

YES NO

___ ✓ Has the POTW identified any IUs with Pollution Prevention opportunities?
✓ ___ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1)(i-ii)]

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

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

What is the maximum term of the control mechanism? 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	

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES NO

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

2/23/09 Date Notified Letter Method of Notification

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

___	Federal Register	✓	Journals, Newsletters
✓	Meetings, Training	✓	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.*

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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/MS	Env. Services Co.
Cyanide	Spectrophotometric	"
Organics	GC/MS	"
Other		
	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.).

SECTION II: PROGRAM ANALYSIS AND PROFILE

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 (except weekends) 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)(viii)]

✓ ___ 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]

SECTION II: PROGRAM ANALYSIS AND PROFILE

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	$ 295
Total	14	$ 295 [WENDB-IUPN]

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

YES	NO	
✓		computerized
✓		hard copy
		OTHER: _____

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
	✓	Inspection and Sampling schedule
✓		Monitoring Data
✓		IU Compliance Status Tracking *(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 4.5

SECTION II: PROGRAM ANALYSIS AND PROFILE

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	" _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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 since the last Audit in 11/08.

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; outreach on correct disposal of pharmaceuticals and pamphlets are sent out regarding correct disposal of oil and grease.

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 Caterpillar Inc. File/ID No. 201208125
Industry Address 9201 Faulkner Lake Road
Industry Description Assembly/finishing motor graders (welding/painting)
Industrial Category Metal Finishing 40 CFR 433 SIC/NAICS Codes: 4231/ 333120
Avg. Total Flow (gpd) ?? Avg. Process Flow (mgd) 4,400

Industry visited during audit: YES

Comments: Mainly assembling, phosphatizing and painting motor graders to send out as finished product

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/NAICS Codes: 2491/ 321114
Avg. Total Flow (gpd) Same Avg. Process Flow (gpd) 30,000

Industry visited during audit: YES

Comments: No process changes from 11/08 Audit

FILE #: 3 Industry Name L'OREAL, USA File/ID No. 2012080118
Industry Address 11500 Maybelline Rd.
Industry Description Manufacturer of cosmetics - water and solvent based
Industrial Category N/A 40 CFR n/a SIC/NAICS Code: 2844/ 325620
Avg. Total Flow (gpd) ?? Avg. Process Flow (gpd) 35,000

Industry visited during audit: YES

Comments: No process changes from 11/08 Audit

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/NAICS Code: 4011/ 482111
Avg. Total Flow (gpd) ?? Avg. Process Flow (gpd) 87,000

Industry visited during audit: YES

Comments: No process changes from 11/08 Audit

FILE #: 5 Industry Name _____ File/ID No. _____
Industry Address _____
Industry Description _____
Industrial Category _____ 40 CFR _____ SIC Code: _____
Avg. Total Flow (gpd) _____ Avg. 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?	1	1	no	no	
a. New source or existing source (NS or ES)?	NS	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-2 for example)*	✓	✓	✓	✓	
If yes, what is the application date?	1/09	5/08	5/08	4/08	
Does it ask for Pollution Prevention information?	✓	✓	✓	✓	
2. Does the file contain a Permit? *(See Attch. A-3 for example)*	✓	✓	✓	✓	
Permit Expiration Date?	8/12	8/12	8/12	8/12	
Is a fact sheet included?	2	2	2	2	
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?	3	4	✓	✓	
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	
f. Sampling frequency?	✓	✓	✓	✓	
g. Sampling locations?	✓	✓	✓	✓	

Comments: 1) Permits and fact sheets should include which category they're covered under; 2) Fact sheets could include more pertinent IU information (see Attch. A-4 for current example); 3) IU's permit limits' page indicates "Instantaneous & Daily Max."; 4) IU's permit indicates a "FOG" limitation instead of the category's "Oil and Grease" limit.

Section III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
h. Requirement for flow monitoring?	✓	✓	✓	✓	
i. Types of samples (grab or composite) for self-monitoring?	1	1	1	1	
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)]	n/a	n/a	n/a	n/a	
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	

Comments: 1) Permits only say "24 hour composites" ("24HC") although samples are flow proportioned.

Section III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	
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?	2	n/a	n/a	n/a	

Comments: 1) City sends sampling tech. to every IU every work day of the year to at least open sampling station. IU never knows when the City may analyze their discharge; 2) IU has submitted a TOMP. City needs to send documentation to the IU their TOMP has been approved or not and place a footnote on their limits' page indicating analyzing for the TTOs has been waived in place of the signed TOMP certification statement.

Section III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Flow	Flow	Flow	Flow	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	
Inspections *(See Attch. A-5 for example)*					
7. Does the IU file contain inspection reports?	1	✓	✓	✓	
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	1	8/11	10/11	10/11	
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.)?	2	2	2	2	
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)] *(See Attachment A-6 for example)*	✓	✓	✓	✓	

Comments: 1) New facility; no inspection yet: 2) Inspections could state, "refer to detailed info provided by IU located with IU's "fact sheet".

Section III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
i. Manufacturing facilities?	1	1	1	1	
j. Chemical handling and storage procedures?	2	2	2	2	
k. Chemical spill prevention areas?	✓	✓	✓	✓	
l. Hazardous waste storage areas and handling procedures?	✓	✓	✓	✓	
m. Sampling procedures?	✓	✓	✓	✓	
n. Laboratory procedures?	✓	✓	✓	✓	
o. Monitoring records?	✓	✓	✓	✓	
p. Evaluation of Pollution Prevention opportunities?	✓	✓	✓	✓	
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?	✓	Archived	n/a	n/a	
b. 90-Day Report?	✓	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?	✓	✓	✓	✓	

Comments: 1) Inspections could state, "refer to detailed info provided by IU located with IU's "fact sheet"; 2) More questions should be asked about chemical handling procedures (ie: is it possible for chemicals transported from the loading dock to the final work station to possibly enter the sewer system untreated? How are the chemicals transported from point A to B to C, etc.)

Section III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
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	
18. Has the IU developed a Slug Control and Prevention Plan?	1	✓	✓	✓	
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	

Comments: 1) New facility. No slug potential discharge potential has been evaluated yet.

Section III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
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	
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:	no	no	no	no	
11. Were there any compliance schedule violations?	n/a	n/a	n/a	n/a	
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: 12/6 - 12/8/11 Date entered into QNCR: 1/6/12
(ASSESSMENT)

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

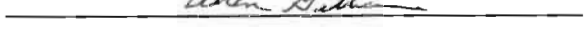
Control Authority: City of N.Little Rock NPDES #: AR0020303
Name, address and phone number of industry:
Caterpillar Inc., 9201 Faulkner Lake Rd., 955.5240
Type of industry: Metal Finisher Date/Time of visit:
12/7/11 / 8:27 a.m.
Industry contacts: Katina Stephens, Env., Safety & Health Mgr.
Paul Clark (Powder Coat Line) and Jacob Hilton

	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	✓*		

*ISO 14001 certified and "other corporate initiatives"

Additional comments: Facility brings in pre-fab hot and cold rolled steel parts for final painting/assembly/testing of motor graders to send out as a finished product. Other raw material on-site include phosphoric acid, black and Caterpillar yellow paint, hydraulic/motor/gear oils, diesel and anti-freeze used to fill the motor graders for their pressure, check and adjust (PCA) system before the graders are sent out as a finished product.

Visit conducted by: Gilliam/Toland/Foreman Date: 12/7/11



(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: Caterpillar Inc.

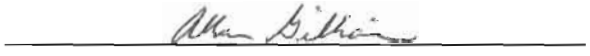
Additional comments: The facility has two separate streams they treat: the PCA side w/the oily water treatment and the coatings side where a simple chemical precipitation/clarifier system is set up to remove metals to meet the 40 CFR 433.17 Metal Finishing Standards. They powder coat their smaller parts and use a liquid spray paint on their larger parts.

Sump pumps oily wastewater on the PCA side (which is de-emulsified) through a strainer to remove macro impurities, then is sent to the O/W separator w/coalescing filters; then gravity fed to a floc (rapid) mix tank and then sent through a DAF system with an oil skimmer. Oily wastes are held in a used oil tank, then sent off-site for proper disposal.

The actual metal finishing core process is a typical alkaline bath/rinse, phosphoric acid bath/rinse then final sealant system prior to the liquid spray (E-coat?) paint line (room). There was some confusion about the phosphatizing line prior to powder coating as the schematic on-file did not match up what was actually present on the production floor. A concrete "curb" surrounds the phosphatizing lines which are designed to contain the entire volume of the system. Carbon filtration followed by R/O is being used for make-up water with its daily backwash of ~500 gpd back to pretreatment not accounted for nor shown on the schematic.

Adequate sampling station(s) and flow monitoring.

Visit conducted by: Gilliam/Toland/Foreman Date: 12/7/11



(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: Timber Products CFR 429 Date/Time of visit: 12/7/11 / 1:05 p.m.

Industry contacts: Matt Bradshaw, Safety/Health & Env. Coordinator & Brad Maxey, 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 a boultonizing process to boil the water out. 7 to 8 hundred ties (loaded on "trams") at a time can be loaded into the horizontal pressure cylinders (7' diameter X 150' long).

Visit conducted by: Gilliam/Toland/Foreman Date: 12/7/11

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 190 degrees F. This cycle can take up to 12 hours depending on wood density and moisture. Oil is pumped back to 4 "work" tanks. When boultonizing, a vacuum is pulled on the cylinder 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/Foreman Date: 12/7/11

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:
12/7/11 / 1:45 p.m.
Industry contacts: Kay Mueller - Env. 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	✓*		

*ISO 14001 certified and "other corporate goals with targets"

Additional comments: Facility has not changed its basic processes/pretreatment since the audit 3+ years ago. Facility manufactures different cosmetic type products such as mascara, face/body powders, sunscreens and make-up removers. Powdered products' formulation areas generate no wastewater. Coverage under the Pharmaceuticals category was discussed but,

Visit conducted by: Gilliam/Toland/Foreman Date: 12/7/11

Gillian 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: L'OREAL, USA

Additional comments: Facility's wastewater 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. IU and City reps very familiar with Pretreatment requirements, plant processes and treatment. IU rep was cooperative and seemed very transparent with answers to any questions asked.

Visit conducted by: Gilliam/Toland/Foreman Date: 12/7/11

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:
Union Pacific Railroad, 800 Pike Ave., 501.373.2066
Type of industry: Locomotive repair & Maintenance
Date/Time of visit: 12/8/11 / 9:30 a.m.
Industry contacts: Tom Franklin, UP Manager Maintenance Ops and 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 has not changed its basic processes/pretreatment since the audit 3+ years ago. 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 was restricted to their pretreatment system because the Union Pacific Ops. Manager was not available.
Visit conducted by: Gilliam/Toland/Foreman Date: 12/8/11

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: No categorical processes exist at this facility. "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. Washwater is 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 gravity flows to their pretreatment "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 (Hatch Mott) has been hired for operating the pretreatment system. Pretreatment begins with basic oil/water gravity separation with skimming; equalization tank; coagulant is added to floc to help 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.
Minor upgrades are planned for their DAF unit to make it more automated.

Visit conducted by: Gilliam/Toland/Foreman Date: 12/8/11

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

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NOV 2 1 2011

NORTH LITTLE ROCK WASTE WATER UTILITY

North Little Rock Waste Water Utility

Pretreatment Division
7400 Baucum Pike
North Little Rock, Arkansas 72117
Fax.: 501-945-2367

Wastewater Screening Form

City of North Little Rock Ordinance #8094 requires that all industrial/commercial dischargers to the North Little Rock Wastewater sanitary sewer meet specific requirements regarding quality and quantity of their discharged wastewater. These requirements are mandated by the U.S. Environmental Protection Agency under the Federal Clean Water Act. In order to assess compliance with the applicable city, state and federal requirements, North Little Rock Wastewater is collecting information from all "non-domestic" dischargers on the system. This Wastewater Screening Form is the first step in this process. **Please complete both pages of this form and return it to the above address within 30 days of receipt.** If you have any questions, please call North Little Rock Wastewater Pretreatment Division at 945-7186 ext 126.

Part I – Industry Information

Business Name: All American Poly

Business Location: North Little Rock

Business Mailing Address: 309 Phillips Road

Contact Person Name: Roger Rosinski

Title: Plant Manager

Telephone Number: 732-752-3200 ext 3207

Business Hours _____ Business Days: ☑ Mon. ☑ Tues. ☑ Wed. ☑ Thurs. ☑ Fri. ☐ Sat. ☐ Sun.

Number of Employees: 50

Water Works Account Number(s):
(Include all Active Account Number(s) 9360111.300

Part II – Wastewater Characteristics

Type of Business: Plastic Blown Film Extrusion

Process(s) Performed: Extrusion

Products Manufactured: Plastic bags + film

SIC Code: 2673 NAICS Code: 326111

Please check all sources of wastewater discharged from you facility to the sanitary sewer.

Type of Wastewater		Estimate Percent of Total Discharge	Type of Wastewater		Estimate Percent of Total Discharge
Bathrooms/Domestic	✓	1500 ft³	Laundry		
Kitchen/Restaurant			Metal Working		
Floor Cleaning			Plating Baths		
Tank Wastes			Equipment Cleaning		
HVAC/Boiler Discharges			Pretreatment System		
Vehicle Maintenance Wash			Machine Coolants		
Waste Product Disposal			Other Non-domestic Sources		

Part II – Continued

Indicate all materials listed below that have a potential for sanitary sewer discharge in some form at your facility. Many of these will be listed on Material Safety Data Sheets:

Yes	No		Yes	No		Yes	No	
☐	☑	Gasoline	☐	☑	Whole Blood	☐	☑	Lime Slurries
☐	☑	Xylene	☐	☑	Fleshings	☐	☑	Lime Residues
☐	☑	Tolulene	☐	☑	Entrails	☐	☑	Sodium Chloride
☐	☑	Diesel	☐	☑	Paper (Non-Domestic)	☐	☑	Sodium Sulfate
☐	☑	Benzene	☐	☑	Styrofoam	☐	☑	Radioactive Wastes
☐	☑	Naptha	☐	☑	Plastic Containers	☐	☑	Radioactive Isotopes
☐	☑	Sulfides	☐	☑	BOD	☑	☐	Storm Water
☐	☑	Kerosene	☐	☑	COD	☐	☑	Surface Water
☐	☑	Ethers	☐	☑	Temperature > 140° F	☐	☑	Ground Water
☐	☑	Alcohols	☐	☑	Medical Wastes	☐	☑	Roof Runoff
☐	☑	Swimming Pool Drainage	☐	☑	Non-Biodegradable Cutting Oils	☐	☑	Non-Contact Cooling Water
☐	☑	Aldehydes	☐	☑	Noxious Gasses	☐	☑	Subsurface Drainage
☐	☑	Peroxides	☐	☑	Toxic Solids	☐	☑	Ketones
☐	☑	Chlorates	☐	☑	Poisonous Solids	☐	☑	Condensate
☐	☑	Perchlorates	☐	☑	Toxic Gases	☐	☑	De-Ionized Water
☐	☑	Bromates	☐	☑	Poisonous Gases	☐	☑	Artesian Well Water
☐	☑	Carbides	☐	☑	Toxic Liquids	☐	☑	Unpolluted Water
☐	☑	Hydrides	☐	☑	Poisonous Liquids	☐	☑	Sludges
☐	☑	Wood	☐	☑	Noxious Liquids	☐	☑	Screenings
☐	☑	Closed Cup Flash Point < 140° F	☐	☑	Hauled or Trucked Liquid Waste	☐	☑	Corrosive Characteristics
☐	☑	LEL > 10%	☐	☑	Noxious Solids	☐	☑	Detergents
☐	☑	pH > 12.0 s.u.	☐	☑	Malodorous Liquids	☐	☑	Surfactants
☐	☑	pH < 5.0 s.u	☐	☑	Malodorous Gases	☐	☑	Mineral Oils
☐	☑	Ashes	☐	☑	Malodorous Solids	☐	☑	Cooking Oils
☐	☑	Cinders	☐	☑	Dye Wastes	☐	☑	Petroleum Oil
☐	☑	Sand	☐	☑	Vegetable Tanning	☐	☑	Fuel Oils
☐	☑	Plastic	☐	☑	Colored Solutions	☐	☑	Pretreatment Residue
☐	☑	Ground Garbage	☐	☑	Inert Suspended Solids	☐	☑	Silver Waste
☐	☑	Un-Ground Garbage	☐	☑	Fuller Earth	☐	☑	Mercury Waste

Part III – RCRA Notification for Hazardous Waste Disposed to the Sanitary Sewer

The USEPA regulations require that local control authorities notify users that there are identification and disposal requirements for hazardous waste. 40 CFR 403.12(p)(1)-(4) States "All users shall notify the POTW of any discharges into the POTW of a Substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261". All users shall dispose of any sludge or spent chemicals in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act. For further instruction on hazardous waste identification and disposal contact the Arkansas Department of Environmental Quality (ADEQ) Hazardous Waste Division at 682-0833. ☐ Yes ☑ No Hazardous Waste Discharge to Sanitary Sewer

Part IV – Certification Statement

40 CFR 403.12 requires that this report be signed by a Chief Executive Officer of at least the level of Vice President, a general Partner or Proprietor, or a Duly-Authorized Representative.

"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 or imprisonment for knowing violations".

Signed: Roger Rosinski Date: 11/10/11

Printed Name and Title: Roger ROSINSKI

NAME OF COMPANY	DATE LETTER SENT	TYPE OF LETTER	RESPONSE REQUIRED	DATE RECEIVED	COMMENTS
ACI PLASTICS INC	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008		DID NOT RECEIVE BACK / GAVE TO MF
A TENENBAUM CO INC	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	1/16/2009	GAVE TO MF
ADAMS SIGNS	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	11/24/2008	SEPTIC TANK NOT ON OUR SYSTEM
ADVANCE FIBERGLASS LLC	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	12/3/2008	GAVE TO MF / OKAY TO FILE
AIRMASTERS LLC	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	12/19/2008	GAVE TO MF/OKAY TO FILE
ALL AMERICAN POLY CORP.	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	12/12/2008	GAVE TO MF / OKAY TO FILE
ALLEN GRANITE INDUSTRIES INC	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	12/1/2008	GAVE TO MF / OKAY TO FILE
ALLIED PRINTING SUPPLY CO	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	11/21/2008	GAVE TO MF/ OKAY TO FILE
ALLISON & ASSOCIATES	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	11/21/2008	RESIDENTIAL ADDRESS
AMERICAN COMPOSTING	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	11/26/2008	GAVE TO MF / OKAY TO FILE
ADEQ	11/17/2008	WASTE SURVEY	YES - BY 12/17/2008	12/15/2008	GAVE TO MF / OKAY TO FILE
KOPPERS	11/18/2008	PERMIT REVISION	NO		REQUIRED CHANGES 40 CFR 403
ARK. SURGICAL HOSPITAL	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
BAPTIST HEALTH NORTH	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
BLUE BEACON	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
CAV	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
CHICOPEE	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
J B HUNT TRANSPORTATION	11/18/2208	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
J M PRODUCTS	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
KOPPERS	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
L'OREAL	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
MAVERICK	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
BRUCE OAKLEY INC	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
ST. VINCENT NORTH	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
TRUCK - O - MAT	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
TYSON FOODS	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
UNION PACIFIC	11/18/2008	STREAMLINING	NO		REQUIRED CHANGES 40 CFR 403
A TENENBAUM CO INC	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
ADEQ EMERG RESP	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
ADVANCE AUTO PARTS 6446	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
ADVANTAGE CLEANERS	11/20/2008	HAZARDOUS WASTE	NO	RETURNED GAVE TO MF	COPY 40 CFR 403.12(p)
AR. TERMINALING & TRADING	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
B & B OIL CO. TRANSPORT SPILL	11/20/2008	HAZARDOUS WASTE	NO	RETURNED GAVE TO MF	COPY 40 CFR 403.12(p)
CAMP JOSEPH T. ROBINSON	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
CENTRAL ARK TRANS AUTH	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
CAV	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
CRESTWOOD CLEANERS	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
CROSS STREET SERVICE	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
DELUXE MEDIA SERVICE	11/20/2008	HAZARDOUS WASTE	NO	RETURNED GAVE TO MF	COPY 40 CFR 403.12(p)
GLOVER'S TRANSMISSION	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
HD SUPPLY WATERWORKS	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
HWRT TERMINAL NLR LLC	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
INX INTERNATIONAL INK CO	11/20/2008	HAZARDOUS WASTE	NO	RETURNED GAVE TO MF	COPY 40 CFR 403.12(p)
ISS	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)

JASON INTERNATIONAL INC	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
KNIGHTS COMPUTERS	11/20/2008	HAZARDOUS WASTE	NO	RETURNED GAVE TO MF	COPY 40 CFR 403.12(p)
KOPPERS INC	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
L'OREAL	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
LEVY CONCRETE	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
LITTLE ROCK POLICE DEPT	11/20/2008	HAZARDOUS WASTE	NO	RETURNED GAVE TO MF	COPY 40 CFR 403.12(p)
MILLER TRANSPORTERS INC	11/20/2008	HAZARDOUS WASTE	NO	RETURNED GAVE TO MF	COPY 40 CFR 403.12(p)
NORTH POINT FORD	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
OZARK AUTOMOTIVE DIST	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
PETERBILT OF LITTLE ROCK	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
SBC	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
TARGET STORE 0162	11/20/2008	HAZARDOUS WASTE	NO		COPY 40 CFR 403.12(p)
VALLI HIGH SHOPPING CTR	11/20/2008	HAZARDOUS WASTE	NO	RETURNED GAVE TO MF	COPY 40 CFR 403.12(p)
UNION PACIFIC	11/24/2008	INSPECTION LETTER	NO		
BAPTIST HEALTH NORTH	12/10/2008	INSPECTION LETTER	YES - BY 01/10/2009	12/4/2008	RECEIVED CALIBRATION REPORT
POLYMER GRP / CHICOPEE	12/10/2008	INSPECTION LETTER	NO		
CAV	12/15/2008	INSPECTION LETTER	NO		
CUMMINS MID SOUTH	1/12/2009	WASTE SURVEY	YES - BY 02/12/2009		DID NOT RECEIVE BACK / GAVE TO MF
BROADWAY DONUTS & MORE	1/12/2009	GREASE TRAP LETTER	YES - BY 02/12/2009	1/15/2009	PER MIITCH DISREGARD THEY AREN'T COOKING
SUBWAY	1/15/2009	GREASE TRAP LETTER	YES - BY 01/31/2009	1/21/2009	RECEIVED GREASE TRAP CLNG GAVE TO MF
SENOR TEQUILA	1/15/2009	GREASE TRAP LETTER	YES - BY 01/31/2009	1/20/2009	RECEIVED GREASE TRAP CLNG GAVE TO MF
BOUDREAUX'S GRILL & BAR	1/15/2009	GREASE TRAP LETTER	YES - BY 01/31/2009	1/20/2009	CONTACTED MITCH PLUMBER THERE 01/20/09
CONE SOLVENTS INC.	1/21/2009	WASTE SURVEY	YES - BY 02/23/2009	RETURED GAVE TO MF	RETURNED UNCLAIMED
CTEH	1/29/2009	WASTE SURVEY	YES - BY 03/02/2009		PER MITCH OKAY
CHURCH'S CHICKEN	1/21/2009	GREASE TRAP LETTER	YES - BY 02/16/2009	5/6/2009	PER MITCH OKAY
SADDLE CREEK WOODFIRED GRILL	2/3/2009	GREASE TRAP LETTER	YES - BY 02/18/2009	3/16/2009	CONTACTED MITCH
GEORGIA'S GYROS	2/3/2009	GREASE TRAP LETTER	YES - BY 02/18/2009	5/6/2009	PER MITCH OKAY
CICI'S PIZZA	2/3/2009	GREASE TRAP LETTER	YES - BY 02/18/2009	2/10/2009	RECEIVED GREASE TRAP CLNG GAVE TO MF
LOREAL USA	2/10/2009	NC LETTER	YES - BY 02/25/2009	3/6/2009	RECEIVED LETTER
UNION PACIFIC	2/10/2009	VIOLATION LETTER	YES - BY 02/25/2009	2/17/2009	RECEIVED LETTER
THE OLIVE GARDEN	2/12/2009	GREASE TRAP LETTER	YES - BY 02/27/2009	3/2/2009	CONTACTED MITCH
RED LOBSTER	2/12/2009	GREASE TRAP LETTER	YES - BY 02/27/2009	3/16/2009	CONTACTED MITCH
CORKY'S RIBS & BBQ	2/12/2009	GREASE TRAP LETTER	YES - BY 02/27/2009	3/2/2009	CONTACTED MITCH
WINGSTOP	2/12/2009	GREASE TRAP LETTER	YES - BY 02/27/2009	2/23/2009	CONTACTED MITCH
BLUE BEACON	2/12/2009	NC LETTER	YES - BY 02/27/2009	2/18/2009	RECEIVED LETTER
ARKANSAS SURGICAL	3/2/2009	CHANGED PERMIT LTR	NO		
ST. VINCENT NORTH	3/2/2009	CHANGED PERMIT LTR	NO		
ALLIANCE TECHNOLOGIES	3/5/2009	WASTE SURVEY	YES - BY 04/06/2009	3/30/2009	GAVE TO MITCH
ATC MICROBIOLOGY	3/5/2009	WASTE SURVEY	YES - BY 04/06/2009	3/23/2009	GAVE TO MITCH
WAGNER INDUSTRIES	3/5/2009	WASTE SURVEY	YES - BY 04/06/2009		DID NOT RECEIVE BACK / GAVE TO MF
DIXIE CAFÉ	3/19/2009	GREASE TRAP LETTER	YES - BY 04/03/2009	3/25/2009	PER MITCH OKAY
CHINA INN	4/1/2009	GREASE TRAP LETTER	YES - BY 04/16/2009		PER MITCH OKAY
UNION PACIFIC	4/16/2009	NC LETTER	YES - BY 05/01/2009	4/24/2009	RECEIVED LETTER
BAPTIST HEALTH NORTH	4/16/2009	NC LETTER	YES - BY 05/01/2009	5/20/2009	RECEIVED LETTER
BLUE BEACON	4/16/2009	NC LETTER	YES - BY 05/01/2009	4/30/2009	RECEIVED LETTER
EGG ROLL EXPRESS	4/21/2009	GREASE TRAP LETTER	YES - BY 05/08/2009	4/29/2009	PER MITCH OKAY

MEXICO CHIQUITO	4/21/2009	GREASE TRAP LETTER	YES - BY 05/08/2009	4/24/2009	PER MITCH OKAY
KFC	4/21/2009	GREASE TRAP LETTER	YES - BY 05/08/2009		PER MITCH OKAY
POLLUTION CONTROL INC	4/21/2009	WASTE SURVEY	YES - BY 05/22/2009	6/11/2009	RETURNED UNCLAIMED GAVE TO MITCH
S & K WINGS	5/5/2009	GREASE TRAP LETTER	YES - BY 05/21/2009	7/1/2009	RETURNED UNCLAIMED GAVE TO MITCH
WENDY'S	5/8/2009	GREASE TRAP LETTER	YES - BY 05/25/2009	5/14/2009	PER MITCH OKAY
KFC/LONG JOHN SILVER	5/8/2009	GREASE TRAP LETTER	YES - BY 05/25/2009	6/11/2009	PER MITCH OKAY
SONIC DRIVE-IN	5/14/2009	GREASE TRAP LETTER	YES - BY 05/29/2009	6/4/2009	PER MITCH OKAY
BLUE BEACON	5/14/2009	INSPECTION LETTER	NO		
PIZZA HUT	5/21/2009	GREASE TRAP LETTER	YES - BY 06/08/2009	7/8/2009	PER MITCH OKAY
TEXAS ROADHOUSE	5/21/2009	GREASE TRAP LETTER	YES - BY 06/08/2009		PER MITCH OKAY
ST. VINCENT NORTH	5/22/2009	NC LETTER	YES - BY 06/08/2009	6/5/2009	RECEIVED LETTER
TRUCK - O - MAT	5/22/2009	INSPECTION LETTER	NO		
JASON'S DELI	5/29/2009	GREASE TRAP LETTER	YES - BY 06/15/2009		PER MITCH OKAY
BRUCE OAKLEY INC	6/8/2009	INSPECTION LETTER	NO		
MAVERICK	7/7/2009	INSPECTION LETTER	YES - BY 08/07/2009	7/27/2009	RECEIVED LETTER
SPECTRA METAL SALES, INC.	7/13/2009	WASTE SURVEY	YES - BY 08/14/2009	7/17/2009	GAVE TO MITCH
JOHN NORRELL, INC.	7/13/2009	WASTE SURVEY	YES - BY 08/14/2009	7/20/2009	GAVE TO MITCH
ST. VINCENT NORTH	7/20/2009	INSPECTION LETTER	YES - BY 08/20/2009		
J B HUNT TRANSPORTATION	8/11/2009	INSPECTION LETTER	NO		
KOPPERS INC	8/31/2009	INSPECTION LETTER	NO		
TYSON FOODS	9/1/2009	INSPECTION LETTER	NO		
WALKERS KITCHEN	9/22/2009	GREASE TRAP LETTER	YES - BY 10/09/2009	10/5/2009	PER MITCH OKAY
GREAT WALL CHINESE REST.	9/22/2009	GREASE TRAP LETTER	YES - BY 10/09/2009		
US PIZZA CO.	9/22/2009	GREASE TRAP LETTER	YES - BY 10/09/2009		PER MITCH OKAY
ARKANSAS SURGICAL	10/2/2009	INSPECTION LETTER	YES - BY 11/2/2009		
LOREAL USA	10/19/2009	INSPECTION LETTER	NO		
KOPPERS	10/19/2009	NC LETTER	YES - BY 11/03/2009	11/3/2009	RECEIVED LETTER
ST. VINCENT NORTH	10/19/2009	NC LETTER	YES - BY 11/03/2009	10/29/2009	RECEIVED LETTER
BRUCE OAKLEY INC	10/19/2009	NC LETTER	YES - BY 11/03/2009	10/23/2009	RECEIVED LETTER
J M PRODUCTS	10/28/2009	INSPECTION LETTER	NO		
UNION PACIFIC	10/28/2009	INSPECTION LETTER	NO		
CUMMINS MID SOUTH	11/16/2009	WASTE SURVEY	YES - BY 12/16/2009	12/9/2009	RETURNED UNCLAIMED GAVE TO MITCH
OLD CHICAGO	11/16/2009	GREASE TRAP LETTER	YES - BY 12/02/2009	11/30/2009	PER MITCH OKAY
SANTO COYOTE	11/19/2009	GREASE TRAP LETTER	YES - BY 12/04/2009		PER MITCH OKAY
BAPTIST HEALTH NORTH	11/30/2009	INSPECTION LETTER	NO		
CHICOPEE	12/9/2009	INSPECTION LETTER	NO		
MI BURRITO	12/9/2009	GREASE TRAP LETTER	YES - BY 12/2/2009		
TICO'S TACOS & BURRITOS	12/9/2009	GREASE TRAP LETTER	YES - BY 1/11/2010		PER MITCH OKAY
CREGEEN'S IRISH PUB	1/11/2010	GREASE TRAP LETTER	YES - BY 01/26/2010	1/19/2010	PER MITCH OKAY
SUPER KING BUFFET	1/12/2010	GREASE TRAP LETTER	YES - BY 01/27/2010		PER MITCH OKAY
LOREAL USA	1/12/2010	NC LETTER	YES - BY 01/27/2010	1/21/2010	RECEIVED LETTER
BAPTIST HEALTH NORTH	1/12/2010	NC LETTER	YES - BY 01/27/2010	1/15/2010	RECEIVED LETTER
KANPAI	1/14/2010	GREASE TRAP LETTER	YES - BY 01/29/2010	8/19/2010	PER MITCH OKAY
LAS PALMAS	1/14/2010	GREASE TRAP LETTER	YES - BY 01/29/2010	1/19/2010	PER MITCH OKAY
SUBWAY	1/14/2010	GREASE TRAP LETTER	YES - BY 01/29/2010		PER MITCH OKAY
TROPICAL SMOOTHIE	1/14/2010	GREASE TRAP LETTER	YES - BY 01/29/2010	1/26/2010	PER MITCH OKAY

NEW ASIAN SUPER BUFFET	1/14/2010	GREASE TRAP LETTER	YES - BY 01/29/2010	1/26/2010	PER MITCH OKAY
SIDETRACKS	1/20/2010	GREASE TRAP LETTER	YES - BY 02/05/2010	2/2/2010	PER MITCH OKAY
BLUE BEACON	1/26/2010	CHANGED PERMIT LTR	NO		
BAPTIST HEALTH NORTH	1/26/2010	CHANGED PERMIT LTR	NO		
SUBWAY BROADWAY	1/28/2010	GREASE TRAP LETTER	YES - BY 2/12/2010	2/23/2010	PER MITCH OKAY
SUBWAY HWY 161	1/28/2010	GREASE TRAP LETTER	YES - BY 2/12/2010	2/23/2010	PER MITCH OKAY
MY FRIENDS BAR	1/26/2010	GREASE TRAP LETTER	YES - BY 02/10/2010	2/2/2010	PER MITCH OKAY
ARKANSAS SURGICAL	2/16/2010	NC LETTER	YES - BY 03/03/2010	2/26/2010	RECEIVED LETTER
BLUE BEACON	2/16/2010	NC LETTER	YES - BY 03/03/2010	2/24/2010	RECEIVED LETTER
GEORGIA'S GYROS	2/16/2010	GREASE TRAP LETTER	YES - BY 03/03/2010	3/15/2010	PER MITCH OKAY
RED LOBSTER	2/16/2010	GREASE TRAP LETTER	YES - BY 03/03/2010	2/18/2010	PER MITCH OKAY
FOX & HOUND	2/16/2010	GREASE TRAP LETTER	YES - BY 03/03/2010	3/15/2010	PER MITCH OKAY
DIXIE CAFÉ	2/19/2010	GREASE TRAP LETTER	YES - BY 03/08/2010	2/23/2010	PER MITCH OKAY
PANERA BREAD	2/19/2010	GREASE TRAP LETTER	YES - BY 03/08/2010	3/15/2010	PER MITCH OKAY
SUBWAY HWY 161	2/23/2010	GREASE TRAP LETTER	YES - BY 03/10/2010	3/19/2010	PER MITCH OKAY
CARINO'S	3/1/2010	GREASE TRAP LETTER	YES - BY 03/16/2010	3/15/2010	PER MITCH OKAY
SHORTY SMALLS	3/1/2010	GREASE TRAP LETTER	YES - BY 03/16/2010	3/19/2010	PER MITCH OKAY
U S PIZZA	3/1/2010	GREASE TRAP LETTER	YES - BY 03/16/2010	3/19/2010	PER MITCH OKAY
OUTBACK STEAKHOUSE	3/1/2010	GREASE TRAP LETTER	YES - BY 03/16/2010	3/15/2010	PER MITCH OKAY
ADEQ	3/16/2010	ANNUAL REPORT	NO		
BLUE BEACON	3/16/2010	NC LETTER	YES - BY 04/01/2010	3/15/2010	RECEIVED LETTER
NEW CHINA	3/25/2010	GREASE TRAP LETTER	YES - BY 04/09/2010	4/31/2010	PER MITCH OKAY
MCDONADS CAMP	4/23/2010	GREASE TRAP LETTER	YES - BY 05/07/2010		
EGG ROLL EXPRESS	4/23/2010	GREASE TRAP LETTER	YES - BY 05/07/2010	5/5/2010	PER MITCH OKAY
KFC CAMP	4/23/2010	GREASE TRAP LETTER	YES - BY 05/07/2010	5/5/2010	PER MITCH OKAY
M3 COSMETIC LABS	5/5/2010	WASTE SURVEY	YES - BY 6/4/2010	5/20/2010	RETURNED UNCLAIMED GAVE TO MITCH
BLUE BEACON	5/14/2010	NC LETTER	YES - BY 5/31/2010	5/19/2010	RECEIVED LETTER
BRUCE OAKLEY INC	5/14/2010	NC LETTER	YES - BY 5/31/2010	6/14/2010	RTND UNCLMD/MITCH HAND DEL. RECD LETTER
ARKANSAS SURGICAL	5/14/2010	NC LETTER	YES - BY 5/31/2010	5/26/2010	RECEIVED LETTER
BLUE BEACON	5/14/2010	INSPECTION LETTER	YES - BY 6/14/2010	6/14/2010	RECEIVED LETTER
TRUCK - O - MAT	5/24/2010	INSPECTION LETTER	NO		
BRUCE OAKLEY INC	6/22/2010	INSPECTION LETTER	NO		
CHILI'S GRILL & BAR	6/24/2010	GREASE TRAP LETTER	YES - BY 7/9/2010	7/6/2010	PER MITCH OKAY
TEXAS ROADHOUSE	6/24/2010	GREASE TRAP LETTER	YES - BY 7/9/2010	7/6/2010	PER MITCH OKAY
MAVERICK	7/20/2010	INSPECTION LETTER	NO		
ST. VINCENT NORTH	7/20/2010	INSPECTION LETTER	NO		
J B HUNT	8/10/2010	INSPECTION LETTER	YES - BY 9/10/2010	9/10/2010	RECEIVED LETTER
BRUCE OAKLEY INC	8/16/2010	NC LETTER	YES - BY 8/31/2010	8/31/2010	RECEIVED LETTER
KOPPERS	8/16/2010	INSPECTION LETTER	YES - BY 9/16/2010	9/16/2010	RECEIVED LETTER
TYSON FOODS	9/2/2010	CHANGED PERMIT LTR	NO		
TYSON FOODS	9/7/2010	INSPECTION LETTER	NO		
CHUCK E CHEESE	9/7/2010	GREASE TRAP LETTER	YES - BY 9/22/2010		
NEW CHINA	9/14/2010	GREASE TRAP LETTER	YES - BY 9/30/2010	9/22/2010	PER MITCH OKAY
JOSE'S MEXICAN GRILL	9/22/2010	GREASE TRAP LETTER	YES - BY 10/08/2010	9/24/2010	PER MITCH OKAY
ARKANSAS SURGICAL	9/30/2010	INSPECTION LETTER	NO		
CASA MEXICANA	10/6/2010	GREASE TRAP LETTER	YES - BY 10/21/2010	10/18/2010	PER MITCH OKAY

L'OREAL	10/18/2010	INSPECTION LETTER	NO		
UNION PACIFIC	10/28/2010	INSPECTION LETTER	NO		
BLUE BEACON	11/15/2010	NC LETTER	YES - BY 12/1/2010	11/24/2010	RECEIVED LETTER
BAPTIST HEALTH NORTH	11/23/2010	INSPECTION LETTER	NO		
CAV	12/8/2010	INSPECTION LETTER	NO		
MAVERICK	12/27/2010	NC LETTER	YES - BY 1/12/2011	1/12/2011	RECEIVED LETTER
TYSON FOODS	1/5/2011	CHANGED PERMIT LTR	NO		
ARKANSAS DIESEL ENGINES	1/18/2011	WASTE SURVEY	YES - BY 2/18/2011	1/31/2011	RECEIVED LETTER
EILER FAMILY DENTISTRY	1/18/2011	WASTE SURVEY	YES - BY 2/18/2011	1/31/2011	RETURNED INCORRECT ADDRESS GAVE TO MITCH
SUBWAY	1/18/2011	GREASE TRAP LETTER	YES - BY 2/3/2011	1/27/2011	PER MITCH OKAY
SENOR TEQUILA	1/18/2011	GREASE TRAP LETTER	YES - BY 2/3/2011	1/25/2011	PER MITCH OKAY
NEW ASIAN SUPER BUFFET	1/18/2011	GREASE TRAP LETTER	YES - BY 2/3/2011	1/25/2011	PER MITCH OKAY
COCKY'S	2/1/2011	GREASE TRAP LETTER	YES - BY 2/16/2011	2/15/2011	RETURNED UNCLAIMED GAVE TO MITCH
PILOT TRAVEL CTR CHESTER CHICKEN/SUBWAY	2/15/2011	GREASE TRAP LETTER	YES - BY 3/2/2011	3/7/2011	PER MITCH OKAY
CATERPILLAR	2/25/2011	CHANGED PERMIT LTR	NO		
MY FRIENDS BAR	2/25/2011	GREASE TRAP LETTER	YES - BY 3/14/2011	3/1/2011	PER MITCH OKAY
KANPAI	3/10/2011	GREASE TRAP LETTER	YES - BY 3/25/2011	3/24/2011	PER MITCH OKAY
LAS PALMAS	3/10/2011	GREASE TRAP LETTER	YES - BY 3/25/2011	3/15/2011	PER MITCH OKAY
BLUE BEACON	3/16/2011	NC LETTER	YES - BY 3/31/2011	4/4/2011	RECEIVED LETTER
MAVERICK	3/16/2011	NC LETTER	YES - BY 3/31/2011	3/31/2011	RECEIVED LETTER
OAKLEY	3/16/2011	NC LETTER	YES - BY 3/31/2011	3/31/2011	RECEIVED LETTER
ADEQ	3/16/2011	ANNUAL REPORT			
E'S BISTRO	3/30/2011	GREASE TRAP LETTER	YES - BY 4/15/2011		
SHORTY SMALLS	4/12/2011	GREASE TRAP LETTER	YES - BY 4/27/2011	4/19/2011	PER MITCH OKAY
US PIZZA CO.	4/12/2011	GREASE TRAP LETTER	YES - BY 4/27/2011	4/19/2011	PER MITCH OKAY
OAKLEY	4/18/2011	NC LETTER	YES - BY 5/3/2011	5/3/2011	RECEIVED LETTER
LARRY'S PIZZA	4/20/2011	GREASE TRAP LETTER	YES - BY 5/4/2011	4/26/2011	PER MITCH OKAY
CASA MEXICANA	4/20/2011	GREASE TRAP LETTER	YES - BY 5/4/2011	4/27/2011	PER MITCH OKAY
BLUE BEACON	5/12/2011	INSPECTION LETTER	NO		
TRUCK - O - MAT	5/17/2011	INSPECTION LETTER	NO		
SENOR TEQUILA	5/18/2011	GREASE TRAP LETTER	YES - BY 6/17/2011	8/25/2011	GREASE TRAP HAS BEEN REPLACED
RIO GRANDE	5/26/2011	GREASE TRAP LETTER	YES - BY 6/10/2011		RETURNED UNCLAIMED / GAVE TO MITCH
EBENEZER	6/8/2011	WASTE SURVEY	YES - BY 7/8/2011		
ALLIANCE WASTE CONSULTING	6/8/2011	WASTE SURVEY	YES - BY 7/8/2011		
KIMBERLY INTERNATIONAL INC.	6/8/2011	WASTE SURVEY	YES - BY 7/8/2011		RETURNED UNDELIVERABLE / GAVE TO MITCH
OAKLEY	6/13/2011	INSPECTION LETTER	NO		
BLANSETT PHARMACAL CO., INC	6/13/2011	WASTE SURVEY	YES - BY 7/13/2011	6/19/2011	RETURNED UNDELIVERABLE / GAVE TO MITCH
RAZOR CHEMICAL INC	6/13/2011	WASTE SURVEY	YES - BY 7/13/2011	6/17/2011	RECEIVED SURVEY
MAVERICK	6/27/2011	INSPECTION LETTER	NO		
ST. VINCENT NORTH	7/19/2011	INSPECTION LETTER	NO		
J B HUNT	8/8/2011	INSPECTION LETTER	NO		
HERITAGE CRYSTAL CLEAN LLC	8/8/2011	WASTE SURVEY	YES - BY 9/7/2011	8/16/2011	RETURNED UNDELIVERABLE / GAVE TO MITCH
KOPPERS INDUSTRIES	9/22/2011	INSPECTION LETTER	NO		
SENOR TEQUILA	8/31/2011	GREASE TRAP LETTER	YES - BY 9/16/2011		
CHINA EXPRESS	8/31/2011	GREASE TRAP LETTER	YES - BY 9/16/2011	9/14/2011	GREASE TRAP HAS BEEN CLEANED
STEVIE'S FISH & CHICKEN	8/31/2011	GREASE TRAP LETTER	YES - BY 9/16/2011	9/28/2011	GREASE TRAP HAS BEEN CLEANED

TYSON FOODS	8/31/2011	INSPECTION LETTER	YES - BY 9/16/2011	9/12/2011	RECEIVED LETTER
NORTHRIDGE HEALTH & REHABILITATION	9/22/2011	GREASE TRAP LETTER	YES - BY 10/24/2011		
ARKANSAS SURGICAL	9/27/2011	INSPECTION LETTER	NO		
HILTON GARDEN INN	10/7/2011	GREASE TRAP LETTER	YES - BY 10/24/2011	10/17/2011	GREASE TRAP HAS BEEN CLEANED
SHIPLEY DONUTS	10/7/2011	GREASE TRAP LETTER	YES - BY 10/24/2011	10/21/2011	GREASE TRAP HAS BEEN CLEANED
CHICK-FIL-A	10/7/2011	GREASE TRAP LETTER	YES - BY 10/24/2011	10/14/2011	GREASE TRAP HAS BEEN CLEANED
CAV	10/11/2011	NC LETTER	YES - BY 10/26/2011	10/20/2011	RECEIVED LETTER
UNION PACIFIC	10/24/2011	INSPECTION LETTER	YES - BY 11/8/2011	11/10/2011	RECEIVED LETTER
A. TENENBAUM CO.	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
ABC SUPPLY CO	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
ACI PLASTICS INC	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
ADAMS SIGNS	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/7/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
ADVANCE FIBERGLASS LLC	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/4/2011	RETURNED UNDELIVERABLE /FORWARDING TIME EXPIRE
AIRMASTERS LLC	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
ALL AMERICAN POLY CORP.	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/21/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
ALLEN GRANITE INDUSTRIES INC	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/8/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
ALLIED PRINTING SUPPLY CO	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
ALLISON & ASSOCIATES	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
AMERICAN COMPOSTING	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
AMERICAN HERITAGE SHUTTERS	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	12/6/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
AMERICAN WHOLESALE GLASS	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
ARCOM SYSTEMS INC.	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
INNERPLAN OFFICE INTERIORS	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/17/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
ARKANSAS INDUSTRIAL MACHINERY	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/10/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
ARKANSAS OPTICAL	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/4/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
ARKANSAS PACKAGING PRODUCTS	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/10/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
ARKANSAS TOOL & DIE INC.	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/17/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
ARKANSAS TURBO	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011	11/21/2011	RECEIVED SURVEY/ PER MITCH OK TO FILE
ONYX LABORATORIES	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
E-Z OXYGEN LLC	11/2/2011	WASTE SURVEY	YES - BY 12/2/2011		
BAPTIST HEALTH NORTH	11/28/2011	INSPECTION LETTER	YES - BY 12/13/2011		
PILOT TRAVEL CTR CHESTER CHICKEN/SUBWAY	11/29/2011	GREASE TRAP LETTER	YES - BY 12/14/2011		

Attachment A-2

WASTEWATER DISCHARGE PERMIT APPLICATION

Prepared for

Caterpillar Inc.
9201 Faulkner Lake Road
North Little Rock, AR 72117

Prepared by

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

January 10, 2009

NAICS # 333120

NORTH LITTLE ROCK WASTE WATER UTILITY

WASTEWATER DISCHARGE PERMIT APPLICATION FOR INDUSTRIAL & COMMERCIAL USERS

Facility Name: Caterpillar Inc.

Operator Name: Same

Facility Address: 9201 Faulkner Lake Road

Business Mailing Address: Same

City: North Little Rock State: AR Zip: 72117

Designated signatory authority of the facility:

Name: Jon Harrison

Title: General Manager

Address: 9201 Faulkner Lake Road

City: North Little Rock State: AR Zip: 72117

Phone Number: (501) 955-3012 Fax Number: (501) 955-5400

NOTE: 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.

Designated facility contact:

Name: Katina Stephens

Title: Environmental Health and Safety Manager

Phone Number: (501) 955-5240 Fax Number: (501) 955-5400

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Name on water account:

Facility Name: Caterpillar Inc.

Facility Address: 9201 Faulkner Lake Road

City: North Little Rock State: AR Zip: 72117

Water account number(s): Commercial water: 936-0054.301
Commercial sprinkler: 936-0055.301
Fire lines: 988-0071.301

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

TYPE	AVERAGE WATER USAGE (GPD)	INDICATE ESTIMATED (E) MEASURED (M)
Contact cooling water	N/A	
Noncontact cooling water	14,000	E
Boiler Feed	N/A	
Process	8,000	E
Sanitary	8,000	E
Air Pollution Control	N/A	
Contained in Product	N/A	
Plant & Equipment Washdown	3,000	
Irrigation & Lawn Watering	3,000	E
Other		
Total	33,000	

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

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( ) 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

(X) Metal Finishing

( ) Metal Products and Machinery

( ) Nonferrous Metals Forming

( ) Nonferrous Metals Manufacturing

( ) Organic Chemical Manufacturing

( ) Paint and Ink Formulating

( ) Paving and Roofing Manufacturing

( ) Pesticides Manufacturing

( ) Petroleum Refining

( ) Pharmaceutical

( ) Plastic and Synthetic Materials Manufacturing

( ) Plastics Processing Manufacturing

( ) Porcelain Enamel

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( ) 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:

The Caterpillar facility will manufacture parts and assemble motor graders for final delivery to customers. The facility will include the following operations: receipt of pre-fabricated parts, fabrication of motor grader components, surface coating of fabricated parts, assembly of fabricated parts, final testing of motor graders, shipment of finished units.

SIC/NAICS Number and Classification SIC 3531 Construction Machinery and Equipment

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

As plant production is brought online over the next year, equipment lines may be added or modified. The treatment system is designed with capacity to handle such additions or modifications. There are no plans for process changes or expansions that would affect the applicability of federal effluent guidelines.

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

Any currently foreseeable modifications or additions should only minimally increase the wastewater discharge volume. No significant change to the wastewater characteristics are anticipated.

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

A treatment system will be installed prior to discharge of any process wastewater to the sewer. The treatment system will have the capability to reduce oil and grease, metals and adjust pH as necessary.

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

The system, after installation, is not expected to change for the foreseeable future.

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.

The treatment system, as described, will be installed prior to the discharge of wastewater to the sewer. Caterpillar expects to begin operations by June 2010.

Facility Operation

Shift Information: Normal 5 day/week

Is the business activity continuous or seasonal? Continuous

Is the facility discharge continuous or seasonal? Continuous

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

The operation can be shut down over weekends, holidays, or for planned maintenance.

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

Steel, paint, paint solvent, manufactured components, diesel fuel, motor oil, and hydraulic oil.

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

See attached list (Appendix A)

Amount of wastewater discharged per day 8,000 gpd monthly 180,000 gallons

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.

The facility is in the process of developing a Spill Prevention Control and Countermeasure Plan in accordance with applicable federal and Arkansas DEQ regulations. A copy of this plan will be provided to the City of North Little Rock upon finalizaion.

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

N/A

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.

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? X Yes, Describe

New facility, see attached diagrams and plant layout. (Appendix B)

No _____

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.

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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.
New facility, see attached diagrams and plant layout. (Appendix B)

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 Building Layout and Site Map.

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.

Various containers and tanks will be located onsite. The locations and size of each container have not been finalized at this time. The attached site map shows the location of the detention ponds that receive a significant amount of drainage from parking lots and loading docks.

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

Floor drains in process areas will drain to the process wastewater pretreatment system.

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 wastewater treatment

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

(X) Storm Drain

( ) To ground

(X) Other, specify: parking lots, onsite pond system

( ) 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	QUANTITY (per year)	DISPOSAL METHOD
used oils	TBD	Recycled off site
Treatment plant sludge	TBD	Landfill
paint residue/other hazardous waste	TBD	Hazardous waste landfill incineration, fuel blending

Have you been issued any Federal, State, or local environmental permits? (X)Yes( )No

If yes, please list and attach a copy. Air permit (2209-A) (Appendix C) and construction stormwater runoff (ARR153036) (Appendix D)

Does your facility practice any Pollution Prevention Activities (such as water reclamation, source reduction, good housekeeping, etc)? If yes, please describe.

Good housekeeping and waste minimalization will be standard procedures at the facility. Chemical and oil storage tanks will have secondary containment. Floor drains in process areas will be routed to wastewater treatment. Spill kits for absorption of spills and leaks of oil and process chemicals will be provided at several areas within the plant. A Spill Prevention, Control, and Countermeasure (SPCC) plan and Stormwater Pollution Prevention Plan (SWPPP) will be prepared prior to plant operation. Also, a Toxic Organic Management Plan will be prepared prior to process wastewater discharge. When possible, steel, plastics, paper, wood, aluminum, and other metals will be recycled. Opportunities will be studied for substitution of chemicals with those that are less hazardous and/or toxic. Any waste materials not readily recycled will be considered for waste-to-energy.

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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.

Jon R Harrison	General Manager
Name	Title
Signature	12/11/09
	Date

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Attachment A-3

Company Name: Caterpillar Inc.
NAICS Number: 333120
Classification: Construction Machinery Manufacturing (MOTOR GRADERS)
Permit number: 201208125

NORTH LITTLE ROCK WASTE WATER UTILITY

WASTEWATER DISCHARGE PERMIT

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

North American Industry Classification System (NAICS) **No.333120**

North American Industry Classification: **CONSTRUCTION MACHINERY MANUFACTURING (MOTOR GRADERS)** (Categorical Status: Metal Finishing EPA 40 CFR 433.17)

Permit Number: **201208125**

Effective Date: **JUNE 1, 2011**

Expiration Date: **AUGUST 31, 2012**

Facility Address: **9201 FAULKNER LAKE ROAD, NORTH LITTLE ROCK, AR 72117**

Mailing Address: **SAME**

Local Company Officer: **PAUL J. RIVERA, GENERAL MANAGER**

Phone Number of Local Company Officer: **(501) 955-5250**

In accordance with the City of North Little Rock Pretreatment Ordinance No. 8094 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 No. 8094 and may subject the Permittee/User to enforcement action.

NORTH LITTLE ROCK WASTE WATER UTILITY

Gary Mills

Gary Mills
Director

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 City of North Little Rock Pretreatment Ordinance No. 8094. 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.

(DMR)- Discharge Monitoring Report

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 a solution, expressed in standard units.

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.

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 a single sample (grab), a composite sample, a continuous sample, or a 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.

(TOMP) TOXIC ORGANICS MANAGEMENT PLAN - Includes the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into wastewater.

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.

TTO- The term TTO shall mean total toxic organics.

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 void 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 City of North Little Rock Pretreatment Ordinance No. 8094.

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 application.

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 City of North Little Rock Pretreatment Ordinance No. 8094.

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 completed **Wastewater Discharge Permit Application** in accordance with Section 4.5 of the City of North Little Rock Pretreatment Ordinance No. 8094, a minimum of 90 days prior to the expiration of this permit. **(Attachment 1)**

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SECTION 3 – PROHIBITED 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 notify the Utility of the incident @ (501) 945-7186. **(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 No. 8094.

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.

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 Permittee/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 a 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.

Prohibited 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 whether 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 No. 8094.

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.

SECTION 4 – EFFLUENT LIMITATIONS

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

Description and location of permitted discharge: (SP-001) Sampling / Monitoring Station located on effluent discharge line from Metals Treatment System, this sampling point is for EPA 40-CFR 433.17 Effluent Limitations. (SP-002) Sampling / Monitoring Station located on effluent discharge line from all process wastewaters combined after all wastewater treatment.

During the duration of this permit the discharge from (SP-001) (SP-002) 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.

(SP-001) FLOW	**DAILY MAXIMUM**
	25,000 GPD

(SP-001) PARAMETER	**INSTANTANEOUS LIMIT & DAILY MAXIMUMS**	**MONTHLY AVERAGE SHALL NOT EXCEED**
Cadmium (T)	0.11 mg/L	0.07 mg/L
Chromium (T)	2.77 mg/L	1.71 mg/L
Copper (T)	3.38 mg/L	2.07 mg/L
Lead (T)	0.69 mg/L	0.43 mg/L
Nickel (T)	3.98 mg/L	2.38 mg/L
Silver (T)	0.43 mg/L	0.24 mg/L
Zinc (T)	2.61 mg/L	1.48 mg/L
Cyanide (T)	1.20 mg/L	0.65 mg/L
TTO	2.13 mg/L	N/A

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(SP-002) FLOW	DAILY MAXIMUM
	60,000 GPD

(SP-002) PARAMETER	INSTANTANEOUS LIMIT & DAILY MAXIMUMS	MONTHLY AVERAGE SHALL NOT EXCEED
BOD	1000 mg/L	1000 mg/L
TSS	1000 mg/L	1000 mg/L
FOG	200 mg/L	200 mg/L
pH	5.0 s.u. / 11.0 s.u.	N/A
Temperature	65 C	N/A
Arsenic (T)	Report	N/A
Cadmium (T)	Report	N/A
Copper (T)	Report	N/A
Lead (T)	Report	N/A
Mercury (T)	Report	N/A
Molybdenum (T)	Report	N/A
Nickel (T)	Report	N/A
Silver (T)	Report	N/A
Thallium (T)	Report	N/A
Zinc (T)	Report	N/A

SECTION 5 – MONITORING REQUIREMENTS

All 24 hour composite samples, including the industries self-monitoring will be regulated by the Utility. When a composite sample is needed for your contract laboratory, attach the red sample tag (furnished by the Utility) on the outside of the refrigerated sampler, the Utility Technician will pour the composite samples into containers supplied by the industries contract laboratory, a chain of custody sheet will be provided for these composite samples by the Utility. If a sample is not needed, place the red sample tag inside the refrigerated sampler. All grab sampling required by this permit may be collected by the permitted industries contract laboratory or the permitted industries facility personnel, chain of custody is required.

(Flow Monitoring/Reporting) Incoming water measurement is by Central Arkansas Water (2 in. dia. Sensus water-meter #356066) located on east side of the facility's main entrance drive, southwest corner of front parking lot. Daily flow measurement readings shall be recorded on the Flow Monitoring Report Form and submitted to the Utility on or before the fifteenth day of the month following the month in which the flow measurement readings were collected.

All samples and daily effluent flow measurement collected for compliance monitoring listed below shall be from the Permitted Sampling Point (SP-001).

PARAMETER	FREQUENCY	SAMPLE TYPE
Flow	One/Day	GPD
Cadmium (T)	One/Month	Grab
Chromium (T)	One/Month	Grab
Copper (T)	One/Month	Grab
Lead (T)	One/Month	Grab
Nickel (T)	One/Month	Grab
Silver (T)	One/Month	Grab
Zinc (T)	One/Month	Grab
Cyanide (T)	One/Month	Grab
* TTO	One/Month	24HC

*TTO sample shall be composited from a minimum of (4) four representative grab samples taken over a (24) twenty four hour period).

* TTO sampling shall be conducted within first 30 days of wastewater discharge and if testing results are less than 2.13 mg/L a North Little Rock Wastewater Utility approved Toxic Organics Management Plan (TOMP) may be implemented in lieu of monthly TTO monitoring. Must submit TOMP certification statement as an attachment to monthly Discharge Monitoring Report (DMR).

All samples and daily effluent flow measurement collected for compliance monitoring listed below shall be from the Permitted Sampling Point (SP-002).

PARAMETER	FREQUENCY	SAMPLE TYPE
Flow	One/Day	GPD
BOD	One/Month	24HC
TSS	One/Month	24HC
FOG	One/Month	Grab
pH	One/Month	Grab
Temperature	One/Month	Grab
Arsenic (T)	One/February	24HC
Cadmium (T)	One/February	24HC

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Copper (T)	One/ February	24HC
Lead (T)	One/February	24HC
Mercury (T)	One/February	24HC
Molybdenum (T)	One/February	24HC
Nickel (T)	One/February	24HC
Silver (T)	One/February	24HC
Thallium (T)	One/February	24HC
Zinc (T)	One/February	24HC

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 Sampling Points 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.

1. Sampling and analysis of these samples shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendment thereto. The laboratory shall be certified for the specified analysis by the (ADEQ) Arkansas Department of Environmental Quality.

2. 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.

3. All sampling and analysis conducted to fulfill the requirements under this section shall be conducted during normal work cycles.

4. The Permittee shall record daily flow in units of gallons per day (GPD).

Compliance Monitoring

Right of Entry: Inspection and Sampling

The Utility shall have the right to enter the premises of any Permittee/User to determine whether the User is complying with all requirements of the City of North Little Rock Pretreatment Ordinance No. 8094 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 the City of North Little Rock Ordinance 8094.

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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 following the month in which the samples were collected.**

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 following the month in which the flow measurement readings were collected.**

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. Records shall include the date, exact place, method, and time of sampling, and the name of the person(s) taking the samples; the dates analyses were performed; who performed the analyses; the analytical techniques or methods used; and the results of such analyses. These records shall remain available for a period of at least three (3) years. This period shall be automatically extended for the duration of any litigation concerning the Permittee/User or the Utility, or where the Permittee/User has been specifically notified of a longer retention period by the Director.

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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). [See 40 CFR403.12(P)(1)]

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.**

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

SECTION 8 – SAMPLING / MONITORING STATION

Sampling / Monitoring Station is required for sampling point (SP-001).
With the following requirements:

1. Unrestricted, safe and convenient means of access to sampling point of regulated/permitted waste-stream.
2. Adequate lighting to perform sampling events.
3. Adequate fresh air ventilation.
4. Utility approved effluent discharge flow meter with totalizer readings measured in gallons.
5. Access to regulated waste-stream for sample collection.

Sampling / Monitoring Station is required for sampling point (SP-002).
With the following requirements:

1. Utility approved building/room large enough to house the automatic sampler and other monitoring equipment, the sampling station is to have adequate heating to prevent freezing of samples and monitoring equipment.
2. Adequate lighting to perform sampling events.
3. Means of disposing of excess wastewater from sampling event.
4. Adequate fresh air ventilation.
5. Unrestricted, safe and convenient means of access to sampling point of regulated/permitted wastestream.
6. Utility approved effluent discharge flow meter with totalizer readings measured in gallons.
7. Utility approved A/C powered Automatic Refrigerated Composite Sampler.
8. Access to regulated wastestream for sample collection.

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 discharge 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 City of North Little Rock Pretreatment Ordinance No. 8094, or orders, rules, 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 City of North Little Rock Pretreatment Ordinance No. 8094, 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)**

Attachment A-4

Koppers Industries
2201 Edmonds Rd. N.L.R.,AR 72117
P.O. Box 15490 N.L.R., AR 72231

Wastewater Discharge Permit # 2012080117 SIC# 2491

This facility discharges to the Faulkner Lake Treatment Plant

Effective Date: September1, 2008

Expiration Date: August 31, 2012

Local Permit Holder:
Brad Maxey
(501) 945-4581

Local Contact Person:
Matt Bradshaw
(501) 920-3769

Permit Maximum Limits:	
Flow	65,000 gpd.
pH	6.0-9.0
Temperature	65c
BOD	1000 mg/l.
TSS	1000 mg/l.
FOG	100 mg/l.

Average Limits:	
Daily Flow	40,760 gpd.
pH	6.62
Temperature	25.8
BOD	109.2 mg/l.
TSS	169.0 mg/l.
FOG	8.3 mg/l.

Koppers Inc. N.LR. Plant primarily produces creosote treated railroad cross and switch ties from air-dried or green hardwood using the boultonizing or pressure treating process and is given SIC# 2491.

Koppers includes a wastewater treatment plant for pre treating process water prior to discharge to the sanitary sewer. Water removed from wood during treatment along with other impacted process water and storm water runoff make up the influent to the WWTP.

There are three general sources of wastewater:

- Process water recovered from condensers, dehydrator and air scrubber
- Storm water and other drainage from drip track and diked areas
- Blow down from boiler and cooling tower

Process and surface waters are collected and sent to large storage tanks to decant and recover heavy oil for recycling back to wood treatment. Process wastewater then flows by gravity through oil-water separator where heavy oil and suspended solids are again drawn off and recycled. The oil-water separator effluent is then pumped to the aeration tank for bio treatment prior to final discharge to sanitary sewer.

Kopper's Industries has been designated a hazardous waste generator by ADEQ.

Attachment A-5

NORTH LITTLE ROCK WASTE WATER UTILITY

August 22, 02011 Cert. No. 7007 0710 0000 0754 9061

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

RE: Annual Inspection Wastewater Discharge Permit # 2012080117

Dear Mr. Maxey:

North Little Rock Waste Water Utility conducted our annual on-site inspection of your North Little Rock facility on August 15, 2011. There were no deficiencies noted during this inspection.

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
P.O. BOX 17898
NORTH LITTLE ROCK, AR 72117-0898

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: Matt Bradshaw, 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:
Date and Time Inspection Ended: 8-15-11 0900hrs	
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:

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: 8-15-11 0800 hrs

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

IU Representatives	NLRWWU Representatives
Matt Bradshaw, 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.: 7 to 3:30	Shift 2, hrs.: to	Shift 3, hrs.: to

No. Of Employees: 90 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: 8-16-10 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	2012080117	8-31-2012
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.

Koppers has been designated a hazardous waste generator by ADEQ.

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. (drawings on file)

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

Date: 8.15.11

A-5e

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: See section 5 paragraph 5.5.1 of pollution prevention plan.		
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, Aluminum, 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 Clean Harbors.		
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: 8-15-11

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

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 flow meters)

Meter Type	Model & S/N	Calibration Procedure and Frequency	Comments (Totalizer Reading)
PH	Rosemont 5081	3 point / 6mo.	
			Calibrations & controls
Flow	Badger	6 mo.	10690 Hinds Rd
			Benton Ar. 72015
		Calibrated- May 2011	

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.

Koppers has been designated a hazardous waste generator by ADEQ. None being discharged to sanitary sewer.

Waste creosote is reclaimed by Clean Harbors.

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 Clean Harbors

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.

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.

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? 2008	☑ 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?	☐ 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. Monitoring and connection points were found to be in good repair.	

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

Date: 8-15-11

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

Test America Inc. Laboratories, Pittsburg, Pa.

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:

Test America Inc. Laboratories

Pittsburg, PA.

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 Freeman
(Print Industrial Inspector's Name Here)

Date: 8-15-11

A-5K

Attachment A-6

INDUSTRIAL PRETREATMENT SECTION
SLUG/SPILL EVALUATION CHECKLIST

SIU NAME: CATERPILLAR

PERMIT #: 20120825 CONTACT: KATINA STEPHENS EHS MANAGER

1. SPILL PLAN
   a. Type on file: (PIPP, SPCC, TOMP, Contingency): SPCC/TOMP Date: 4-29-11
   b. Number of Spills in last 3 years: N/A
2. CHEMICAL STORAGE
   a. Attach chemical list including location of chemical, quantity stored, and container size. ATT. TO SPCC/TOMP
   b. Containment: Yes ✓ No ____ Describe: TRENCH WITH NO OUTLET FOR PERIMETER CONTAINMENT
      Condition: Good ✓ Fair ____ Poor ____ N/A ____
   c. Drains/Trenches: Yes ✓ No ____ Routed to: NO OUTLET
      Distance from storage tanks or drums (in feet): ____
   d. Spill Potential (High, Medium, Low): LOW
3. MANUFACTURING PROCESS
   a. Process solutions in tanks

Chemical Solution Name	Location (attach sketch),	Process Tank Size (in gallons)
PAINT COATINGS	- LIQUID PAINT - POWDER PAINT	4880 gal *3

   b. Do process solution tanks overflow? Yes ____ No ✓ DRAINED IF NEEDED
      If so, is overflow liquid contained? Yes ____ No ____
      Describe containment: TRENCH DRAIN WITH SUMP PUMPS
      Condition of containment: Good ✓ Fair ____ Poor ____ N/A ____
   c. Drains/Trenches: Yes ✓ No ____ Routed to: PRETREATMENT
      Distance from Process Tanks (in feet): DIRECT
   d. Spill Potential (High, Medium, Low): LOW
4. PRETREATMENT SYSTEM
   a. Evaluate potential for operating upsets (High, Medium, Low): LOW
   b. Calibration frequency of instrumentation and/or equipment (specify):
      (Example: pH probes) PH = 6 MOS.
   c. Spare parts on hand: Yes ✓ No ____
   d. Excess wastewater holding capacity: Yes ✓ No ____
   e. Is there a control system to monitor operation of pretreatment system?
      Yes ✓ No ____
      Describe corrective action which will be taken if an alarm condition occurs:
      WHEN HIGH WATER ALARM IS ACTIVATED ON EQ TANK, THE CONTROL SYSTEM WILL SHUT DOWN THE SUMP PUMP ON FACTORY FLOOR
   f. By – pass potential: High ____ Medium ____ Low ✓ N/A ____
5. LOADING/RECEIVING DOCKS
   a. Drains/Sumps: Yes ✓ No ____ If yes, where routed to:
      Storm ✓ Sanitary ____ Pretreatment ____ Other ____
6. SPECIFIC PROHIBITIONS
   a. Are any items present? Yes ____ No ✓
   b. Potential to discharge: High ____ Medium ____ Low ____ N/A ✓

7. NON-ROUTINE BATCH DISCHARGES
   a. Does facility have these types of discharges? Yes _____ No ✓
      (Defined as non-scheduled, occurring at 6 month frequency or longer)
   b. Name of chemical solution discharged: N/A

8. NON-DISCHARGED WASTES
   a. Are any generated? Yes ✓ No _____
   b. List these Non-Discharged Wastes, if "yes":

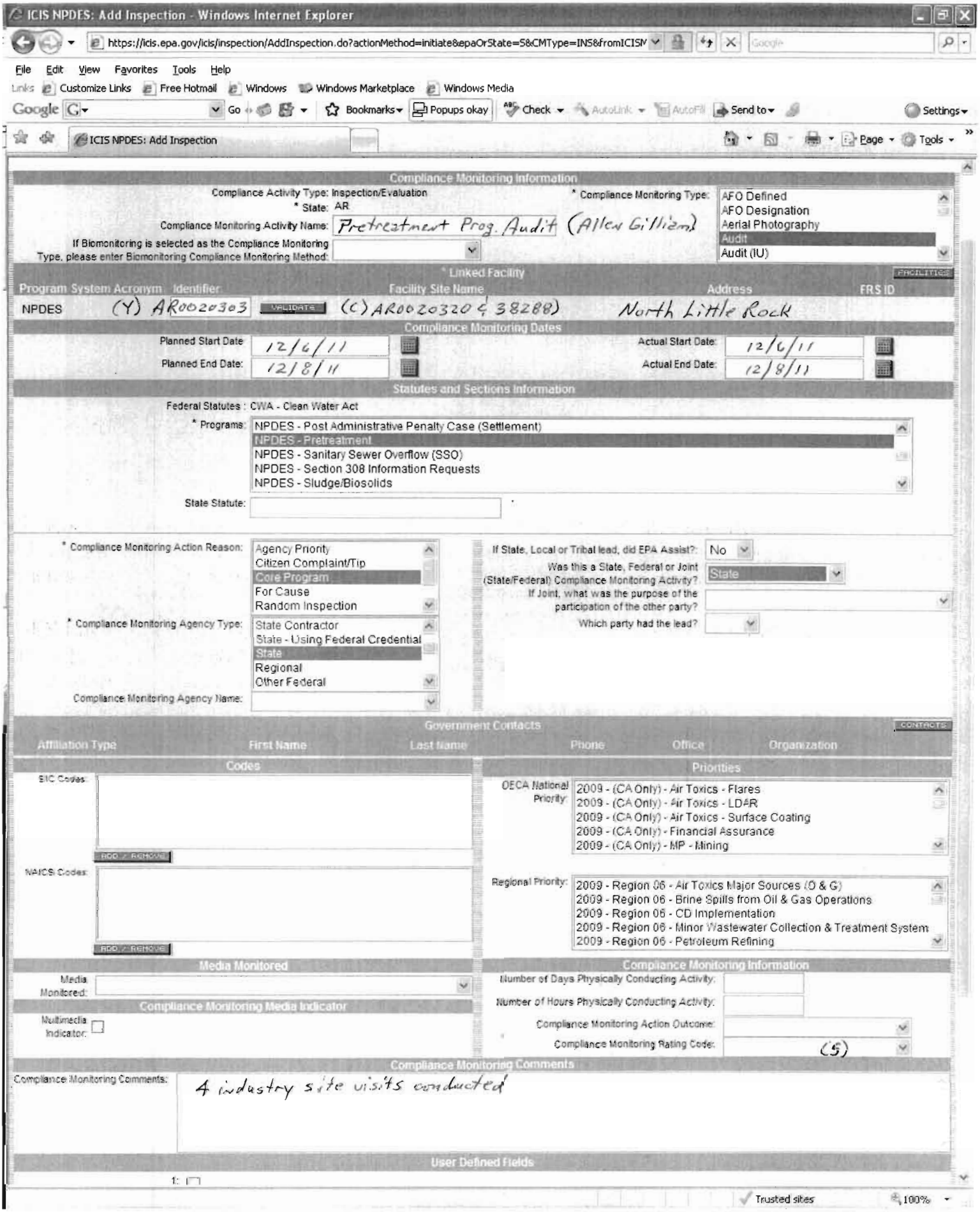
Type of Waste (Examples: waste solvent, waste oil, pretreatment sludge, etc.)	Quantity per Year Generated	Disposal Method
WASTE OIL, SLUDGE WASTE PAINT	UNKNOWN AT THIS TIME	WASTE MANAGEMENT HAS ON SITE RRP. THAT COORDINATES ALL WASTE REMOVAL.

   c. Describe protective measures to prevent accidental discharge of these substances into the sanitary sewer system: USED OIL IS DIKED & CONTAINED IN WWTP. THERE ARE NO OPEN DRAINS TO SANITARY SEWER. ALL WATERS GENERATED IN PLANT ARE TREATED BEFORE DISCHARGE. (OTHER THAN DOMESTIC)

RECOMMENDATIONS

A. ✓ Existing Spill Plan adequate. Combined Slug/Spill Control Plan not needed.
B. _____ New Slug/Spill Control Plan required.
C. _____ Add slug provisions to existing Spill Plan.
D. _____ Other deficiencies to be corrected: _____
E. _____ No Slug/Spill Control Plan is necessary at this facility.

Signature: M Foran Date: 7-25-11


ICIS NPDES: Add Inspection - Windows Internet Explorer

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

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: Pretreatment Prog. Audit (Allen Gilliam)

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 FACILITIES

Program System Acronym	Identifier		Facility Site Name	Address	FRS ID
NPDES	(Y) AR0020303	VALIDATE	(C) AR0020320 & 38288)	North Little Rock	

Compliance Monitoring Dates

Planned Start Date: 12/6/11

Planned End Date: 12/8/11

Actual Start Date: 12/6/11

Actual End Date: 12/8/11

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:

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code: (5)

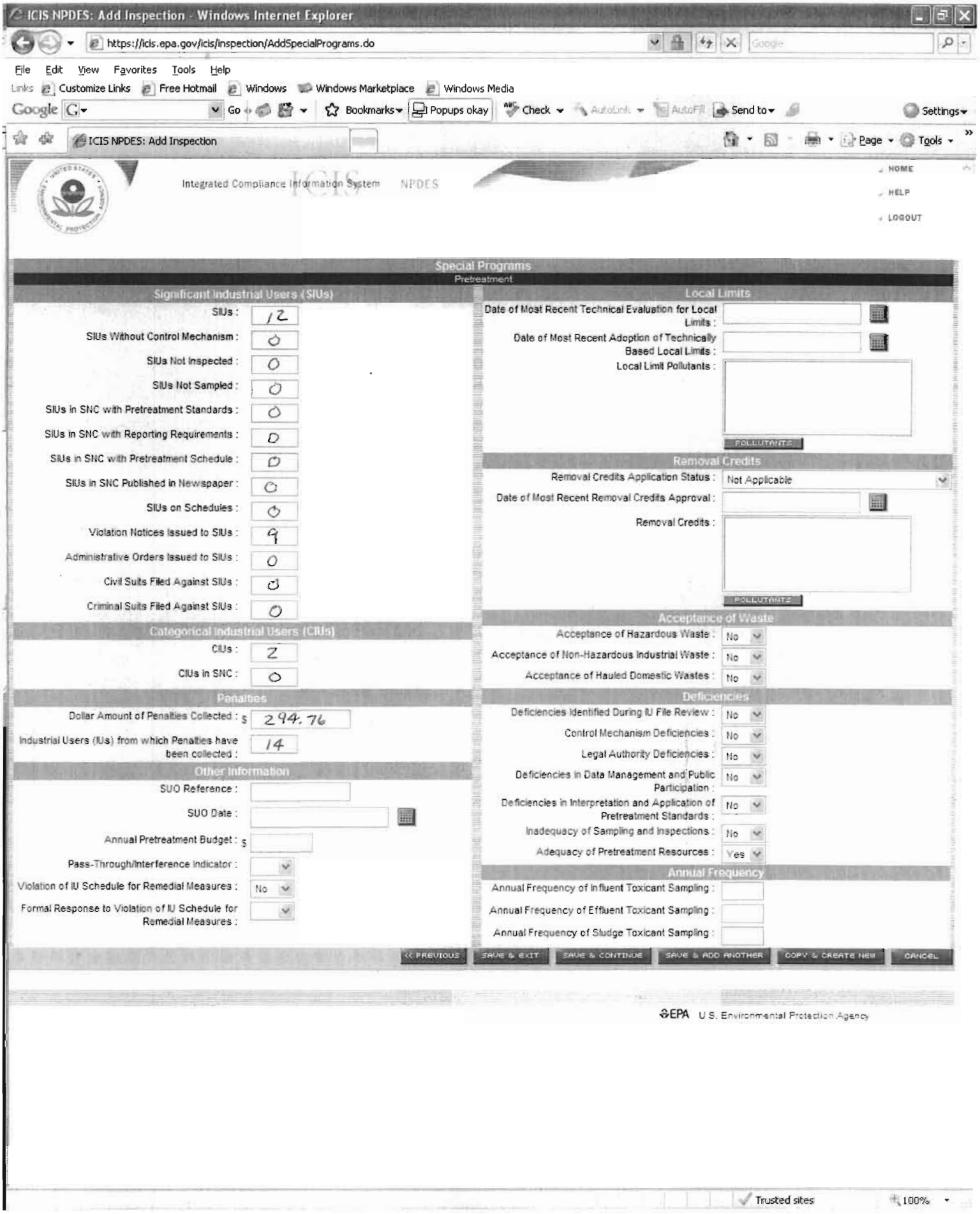
Compliance Monitoring Comments

Compliance Monitoring Comments: 4 industry site visits conducted

User Defined Fields

1:

Trusted sites 100%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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
Integrated Compliance Information System ICIS NPDES
HOME
HELP
LOGOUT
Special Programs
Pretreatment
Significant Industrial Users (SIUs)
SIUs : 12
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 : 9
Administrative Orders Issued to SIUs : 0
Civil Suits Filed Against SIUs : 0
Criminal Suits Filed Against SIUs : 0
Categorical Industrial Users (CIUs)
CIUs : 2
CIUs in SNC : 0
Penalties
Dollar Amount of Penalties Collected : $ 294.76
Industrial Users (IUs) from which Penalties have been collected : 14
Other Information
SUO Reference :
SUO Date :
Annual Pretreatment Budget : $
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 :
Date of Most Recent Adoption of Technically Based Local Limits :
Local Limit Pollutants :
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
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%