ADEQ

ARKANSAS
Department of Environmental Quality

JAN 20 2016

Marc Wilkins
Director, Wastewater Utilities
North Little Rock Waste Water Utility
7400 Baucum Pike
P.O. Box 17898
North Little Rock, Arkansas 72117

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 November 17th through the 19th, 2015. The report should be made available for review by appropriate City officials. No Pretreatment Regulatory violations were indicated during this Audit.

Discussions and an evaluation should be made concerning its recommendations.

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 aimed at more involvement/integration of P2 into your Pretreatment staff's daily 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

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)

ec: Jason Bolenbaugh/NPDES Inspector Branch Manager
Rudy Molina/EPA 6WQ-PO
E/NPDES/NPDES/Pretreatment/Reports

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF NORTH LITTLE ROCK, ARKANSAS

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

JANUARY 13, 2016

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 November 17th through the 19th, 2015, of the Pretreatment Program implemented by City of North Little Rock, Arkansas. Participants included:

Allen Gilliam	ADEQ/Pretreatment Coordinator
Ed Toland	City/Pretreatment Supervisor
Mitch Foreman	City/Senior Pretreatment Technician
Beth Caipen	City/Pretreatment Clerk

["The City, North Little Rock" or "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 6.85 MGD. This POTW receives approximately 0.59 MGD from 12 significant industries, 2 of which are categorical.

Sludge is sent through a belt press for dewatering. The City disposed of 1,012 dry tons of biosolids during 2015 to a local landfill.

The Five Mile Creek POTW consists of bar screen grit removal; four (4) 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 5.79 MGD. This POTW receives "significant" industrial wastewater (~47,000 gpd) from one (1) hospital. Its sludge is stored in its lagoons, 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 3.45 MGD with only one (1) surgical "hospital" permitted which discharges ~11,400 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.

There were no Pretreatment Regulation violations indicated during this Audit.

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 Pretreatment 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 more pertinent information on the City's current SIU fact sheets. Current "fact sheets" (see Attch. A-4 for an example) does not include the IU's contact information, cognizant official, date of first discharge, slug potential evaluation, updated/accurate updated schematic, permit limits' basis, etc. These fact sheets should include a date when they were submitted/revised.

Although information about the City's permitted industries was scattered throughout inspections and applications, it should be digested and housed in one section of the IUs' files. These fact sheets should be sent to the industry representative for them to revise/complete. Comprehensive narrative descriptions of their manufacturing operations and updated/accurate schematics should also be asked for AND dated. Attachment A-4 does not mention wastewater generated by its manufacturing processes, what is regulated or non-regulated.

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.

Future inspections asking questions regarding process descriptions, slug potential, etc. could be easily answered with the statement, "On file with the City" saving the Pretreatment Inspector time not having to reproduce the same information on subsequent inspections.

3) Recommend clarifying what the City requires of "24 HC" (24 hour composites) in the IUs' permits. It was understood most of the City's sampling is time-proportioned, but with maybe one being flow-proportioned. Can this be so stated on the permits' monitoring requirements section (attch. A-3p) to avoid any confusion?

4) Strong recommendation to send 40 CFR 403.12(p) hazardous waste notification to the haz waste generators known to be connected to the City (latest ADEQ list provided during Audit). With the proposed rule regarding hazardous waste being generated at healthcare facilities, it's also recommended to identify those potentially affected by this proposed rule and send them the same notification.

5) Recommend including more questions regarding chemical/hazardous waste handling procedures on the City's IU inspection forms. 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 and how they're disposed of? Does the IU use fork lifts, barrel dollies, 5 gallon open topped containers, overhead piping, etc?

Also recommend including more narrative on the inspection forms regarding the actual visual evaluation of the IU's O&M, process/pretreatment tanks/sumps, etc. Are there indications of rust, cracked welds/tanks, excessive vibration of pumps or mixing propeller shafts, leaks, containment descriptions, corroded concrete, general indoor/outdoor "housekeeping", etc.

6) Include pollution prevention (P2) questions on future industry applications/IU survey questionnaires. Suggest requiring industries/business submit what they've achieved regarding pollutant source reduction, best management practices, waste minimization, lean manufacturing, just-in-time manufacturing, ISO 140001 certification, water/energy conservation, etc.

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.

* * * * * * * *

The City should consider the recommendations contained in this audit/assessment before finalizing any Pretreatment Program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, should be submitted to ADEQ for review and approval. Non-substantial modifications must follow the requirements in 40 CFR 403.18(d).

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: North Little Rock NPDES Tracking #: AR0020303

Mailing address: 7400 Baucum Pike, P.O. Box 17898 72117
Permit Signatory: Marc Wilkins Title: Director, Wastewater Utilities

Telephone: 501.945.7186 FAX NUMBER: 501.945.2367

Pretreatment Contact: Ed Toland Title: Pretreatment Supervisor
Address: same
Telephone: same
e-mail etoland@nlrwu.com

Pretreatment program approval date: 3/16/84

Dates of approval of any substantial modifications: 2/26/95
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: 11/17 - 19/15
(ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
*Ed Toland	Pretreatment Supv./NLR W.W.	"
Mitch Foreman	Sr. Pretreatment Tech./NLR W.W.	"
Beth Caipen	Pretreatment Clerk/NLR W.W.	"

* Identifies Program Contact

Dates of Previous PCIs/Audits:

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

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: ????
Issuance Date: "
Expiration Date: "

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

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 11/10/15 there has not been any lethality nor sub-lethality shown for either species in the past 3 years (8 tests)

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)
TSS 6/30/15	High volume

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: 5/31/17

Treatment Plant Wastewater Flow: Design- 6.6 MGD; Actual (Avg)- 5.79 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 0

Industrial Contribution to this Treatment Plant

# of SIUs: 1 (St. Vincent Med. Center) # of CIUs: 0
Industrial Flow (gpd): ~50,000 Industrial Flow (%): 0.86 %

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: secondary contact recreation, raw water source for domestic, industrial, and AG water supplies, 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 (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: ????
Issuance Date: "
Expiration Date: "

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

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 5% critical dilution, as of 11/10/15 there has not been any lethality nor sub-lethality shown for either species in the past 3 years (6 tests).

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

✓ ___ 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)
BOD 5/31/15	High flow

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)- 3.45 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 2

Industrial Contribution to this Treatment Plant

# of SIUs: 1 (AR. Surgical Hosp.) # of CIUs: 0
Industrial Flow (gpd): ~11,400 Industrial Flow (%): 0.33 %

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: secondary contact recreation, raw water source for domestic, industrial, and AG water supplies, 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 (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: Conventionals, TRC and Nitrate+Nitrite Nitrogen

a. (continuation of individual treatment plant information for White Oak Bayou 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

✓ ___ 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 29% critical dilution, as of 11/10/15 there has not been any lethality nor sub-lethality shown for either species in the past 3 years (5 tests)

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

✓ ___ 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)
n/a	

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.

1. Modifications:

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

2. Modifications in Progress:

Date Requested	Nature of Modification
n/a	

YES	NO	
___	✓	Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:
n/a		Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

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

Date of original Pretreatment Program approval: 3/16/84
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:

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

____no___ 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. Parts of Sherwood	0	1 (Hospital)	Interjurisdictional (Permit)
2.			

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

Problems

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

Briefly describe other problems: _____

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES	NO	
✓	___	Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *City sent out ~95 IU Surveys during 2015. (See Attch. A-1 for log of "letters sent" and example IU survey)*
___	✓	If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?
___	✓	Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
___	✓	If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2 reference materials to the IUs which qualify?

What methods are used to update the IWS:

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

How often is the survey to be updated? Ongoing

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

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

Name of IU	Type of Industry	Is the IU Permitted?

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

a.	14	SIUs (As defined by the Control Authority)
b.	2	Categorical Industrial Users (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? **Not specifically documented except in IU inspections.*
✓	___	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? 4 yrs.

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? 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? [403.5(c)(1); 403.8(f)(4)]

		Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		9/95 Numerical (ADEQ/McLelland) MAHLs Calculated (Lbs/day)
		Yes	No	Yes	No	Yes	No	
Arsenic (As)		✓	___	___	✓	___	✓	0.71
Cadmium (Cd)		✓	___	___	✓	___	✓	0.58
Chromium-Total		✓	___	___	✓	___	✓	35.67
Copper (Cu)		✓	___	___	✓	___	✓	21.0
Cyanide (CN)		✓	___	___	✓	___	✓	18.03
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 ? [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? ***Each IU has dedicated electrified sampling building.***

___ ✓ 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 (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements
0	0	Reporting requirements
0	0	Pretreatment compliance schedule

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

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	_____
___	✓	Pass through	_____
___	✓	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	2	$ 1,189
Total	2	$ 1.189

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 12/11.

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 & G and non-dispersibles. Some large utility vehicles now have large ads on them regarding proper grease disposal methods.

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. 201608125
Industry Address 9201 Faulkner Lake Road 72117
Industry Description Assembly/finishing motor graders (welding/painting)
Industrial Category Metal Finishing 40 CFR 433 SIC/NAICS Codes: 3531/333120

Avg. Total Flow (gpd) ?? Avg. Process Flow (mgd) 4,400

Industry visited during audit: YES

Comments: No process changes from 12/11 Audit.

FILE #: 2 Industry Name L'OREAL File/ID No. 2016080118
Industry Address 11500 Maybelline Rd. 72117
Industry Description Mfg. cosmetics, lip gloss, face powders, etc.
Industrial Category n/a 40 CFR n/a SIC/NAICS Codes: 2844/325620

Avg. Total Flow (gpd) ?? Avg. Process Flow (gpd) 27,000

Industry visited during audit: YES

Comments: No process changes from 12/11 Audit

FILE #: 3 Industry Name Blue Beacon File/ID No. 2016080112
Industry Address 3210 Hwy. 391 72117
Industry Description Exterior Truck Wash
Industrial Category n/a 40 CFR n/a SIC/NAICS Code: 7542/811192

Avg. Total Flow (gpd) ?? Avg. Process Flow (gpd) ~11,000

Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name Truck-O-Mat File/ID No. 2016080122
Industry Address 11601 Kinard Rd. 72117
Industry Description Exterior Truck Wash
Industrial Category n/a 40 CFR n/a SIC/NAICS Code: 7542,5541/811192

Avg. Total Flow (gpd) ?? Avg. Process Flow (gpd) ~8,500

Industry visited during audit: YES

Comments:

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?	✓	no	no	no	
a. New source or existing source (NS or ES)?	NS	n/a	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?	12/09	5/12	5/12	4/12	
Does it ask for Pollution Prevention information?	✓	✓	✓	✓	
2. Does the file contain a Permit? *(See Attch. A-3 for example)*	✓	✓	✓	✓	
Permit Expiration Date?	8/16	8/16	8/16	8/16	
Is a fact sheet included?	1	1	1	1	
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	✓	✓	✓	✓	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	✓	✓	✓	✓	
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	
f. Sampling frequency?	✓	✓	✓	✓	
g. Sampling locations?	✓	✓	✓	✓	
h. Requirement for flow monitoring?	✓	✓	✓	✓	

Comments: 1) See Attch. A-4 for example. Will recommend additional pertinent info.

Section III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
i. Types of samples (grab or composite) for self-monitoring?	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 state "24 hour composites" ("24HC"). 24HCs needs to be defined in each IU permit as at least one IU conducts 24 hr flow proportioned composite sampling.

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)]	✓	✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	✓	n/a	n/a	n/a	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	1	1	1	1	

Comments: 1) See previous recommendation regarding flow vs time composite sampling.

Section III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
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?	✓	✓	✓	✓	
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	12/14	9/15	4/15	4/15	
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	n/a	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	1	1	1	1	
f. Evaluation of pretreatment facilities?	2	2	2	2	
g. Evaluation of self-monitoring equipment and techniques?	2	2	2	2	
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)] *(See Attachment A-6 for example)*	✓	✓	✓	✓	
i. Manufacturing facilities?	1,2	1,2	1,2	1,2	

Comments: 1) Inspections could state, "refer to detailed info provided by IU located with IU's 'fact sheet'"; 2) Could have more narrative regarding the physical shape all equipment is in; e.g: rust, leaks, pooling of fluids on floor, concrete floor "corrosion", excessive vibration seen from motors/pumps/mixing vat shafts, cracked tanks/welds, etc. or "Mfg facilities seemed to be good operating order with no concerns observed. SOPs are being followed with good PM (prev. maint.) management".

Section III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
j. Chemical handling and storage procedures?	1	1	1	1	
k. Chemical spill prevention areas?	✓	✓	✓	✓	
l. Hazardous waste storage areas and handling procedures?	1	1	1	1	
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?	Arch'd	n/a	n/a	n/a	
b. 90-Day Report?	Arch'd	n/a	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) More narrative should be made about chemical/haz waste storage/spill handling/spill prevention 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.). How are the various chems transported? Via overhead piping, barrel dollies, forklifts, 5 gallon buckets, 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?	✓	✓	✓	✓	
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	1	1)pH 8	1	

Comments: 1) City takes daily pH samples at every IU. This particular facility was undergoing complete remodeling/expanding their facility during this particular time.

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	✓	✓	✓	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	✓	✓	✓	
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	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/a	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	✓	✓	✓	
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 North Little Rock NPDES #: AR0020303

Date of Audit: 11/17 - 19/15 Date entered into QNCR: 1/11/16
(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

NO Is the Control Authority in SNC for violation of any Level I criterion.

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

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: North 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: 11/18/15 / 8:30 a.m.

Industry contacts: Katina Stephens, Env., Safety & Health Coordinator/Jacob Felton, EH&S Assoc./Pat Murphy, W.W. Tech.

	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	✓*		

*Facility is seeking ISO 14001 certification. Corporate also has and internal "Vision 20/20" program which has goals to meet within the next 5 years and has a sustainability function.

Additional comments: Facility has not changed its operations since the previous Audit site visit in 12/11. Facility brings in pre-fab, pre-assembled motors, tires and other parts/raw material. 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/Foreman Date: 11/18/15

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: North 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. This Pretreatment area appeared clean, well maintained and was surrounded by a 3-4" concrete curb. 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 1st 4 stage line consists of a Fe phosphate bath, R/O water "halo" rinse, a non-chrome "passivation" sealant application followed by an R/O water "Halo" rinse. The 2nd metal finishing core process is a typical 5 stage alkaline cleaning bath followed by an R/O water "halo" rinse, Fe phosphoric acid bath, R/O water "halo" rinse, a non-chrome "passivation" sealant application followed by a final R/O water "halo" system prior to the liquid spray paint line. A concrete "curb" surrounds the phosphatizing lines which are designed to contain the entire volume of the system. R/O water is filtered (2 sand, 2 activated carbon cylindrical filters and a horizontal micro-membrane filter), subject to UV and re-used as make-up water. Adequate sampling station(s) with totalizer mag-meter flow monitoring (calibrated 1/6 months). 2 point calibration for their pH meters.

Visit conducted by: Gilliam/Foreman Date: 11/18/15

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: North Little Rock NPDES #: AR0020303 Name, address and phone number of industry:
L'OREAL USA S/D Inc. 11500 Maybelline Road, 501.955.8967
Type of industry: Cosmetics Date/Time of visit:
11/18/15 / 1:20 p.m.
Industry contacts: Rachael Furman, Env. Mgr.

	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 Sustainable Development Goals to reduce Environmental impact

Additional comments: Facility has not changed its basic processes/pretreatment since the audit in 12/11. Facility manufactures different cosmetic type products such as mascara, lip gloss, face/body powders, foundations and make-up remover. Areas for powdered products formulation generate no wastewater.

Visit conducted by: Gilliam/Foreman Date: 11/18/15

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: North 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" w/blenders and then drained. The facility has washrooms where removable pieces of equip. are also cleaned, such as valves, hoses and drum pumps. The mixing containers for powdered products are not washed with water; rather, everything is just brushed down. Pretreatment is done in a separate building. All "process" wastewater gravity flows to lift station then pumped into an outside 30,000 gallon equalization tank. From there the w.w. is treated in a batch process. Wastewater is flowed through four bag filters in series and pH adjusted using carbon dioxide, then treated with floc and polymer before going through a 6' circular dissolved air flotation (DAF - Krofta brand "SupraCell 6") w/a rotating skimmer to further remove oils, greases and suspended solids. Sludge that is produced by the DAF is held in sludge tanks until it is processed using a rotary vacuum drum filter and Pearlite, a filter aid. The effluent from the DAF is held in a holding tank while it is tested for COD before being released. Effluent is sampled at a station outside the plant after the w.w. is released from the holding tanks. Nail enamel packaging is done is a separate building with no w.w. 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/Foreman Date: 11/18/15

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: North Little Rock NPDES #: AR0020303
Name, address and phone number of industry:
Blue Beacon, 3210 Valentine Rd. 72117, 945.7023
Type of industry: Exterior Truck Wash Date/Time of visit:
11/19/15 / 8:15 a.m.
Industry contacts: Jim Brown, General Mgr.

	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 operations in many years. The cleaning of over-the-road trucks and their trailers has not changed although they're currently making some upgrades; therefore, their pH violations. The facility mixes all its own cleaning chemicals. This is done in a separate room with chemical feed pumps delivering different soaps and/or hydrochloric or citric acids into different sized totes where they are thoroughly mixed.

Visit conducted by: Gilliam/Foreman Date: 11/19/15

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: North Little Rock NPDES #: AR0020303

Industry name: Blue Beacon Truck Wash

Additional comments:

These cleaning chemicals are pumped to the wash bays' hand wands by which they are applied. Blue Beacon has two bays with about 7 men (only 2/truck on the night shift) hand brushing the trucks, trailers and tires with either the detergent (soda ash?) or acid followed by a final rinse. The diluted citric acid is only used to polish the aluminum sides of the truck. The facility runs through ~150 over the road trucks/day taking anywhere from 7-8 minutes to ~25 minutes depending on the type of wash the driver requests.

The floor drains to a 3 stage (below ground) separator. pH is manually adjusted 3/day as needed to meet permit limits before discharge.

Adequate sampling station. Facility, although undergoing upgrades appeared orderly and well maintained.

Visit conducted by: Gilliam/Foreman Date: 11/19/15

Allen D. Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: North Little Rock NPDES #: AR0020303

Name, address and phone number of industry: Truck-O-Mat, 11601 Kinard Rd. 72117, 501.945.2899

Type of industry: Exterior Truck Wash

Date/Time of visit: 11/19/15 / 9:00 a.m.

Industry contacts: Ronnie Strange, Asst. Mgr.

	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 operations since the last site visit conducted in 2008. It's operations and truck washing chemicals are basically the same as the previous truck wash facility only it only has one bay; therefore, about half the wastewater being discharged to the City.

Visit conducted by: Gilliam/Foreman Date: 11/19/15

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: North Little Rock NPDES #: AR0020303

Industry name: Truck-O-Mat

Facility also has automated sprayer nozzles. As the truck drives through nozzles are activated, or hand held wands spray either the detergent (caustic), acids (not just citric and hydrochloric, but sulfuric also) or final rinse. The final rinse water is sent through activated carbon and a cotton filter before it's used. Men also use soft brushes between stages to better clean the entire truck. Facility has a pumper truck coming in twice per month to clean the bay's collection pits. There's 4 of them in series separated by baffles to help settling before gravity draining to the main underground pit outside. They use a degreaser [Dipropylene glycol monomethyl ether (DPM)] to clean their own bay. This was not mentioned at the previous truck cleaning facility.

Sampling point is adequate.

Visit conducted by: Gilliam/Foreman Date: 11/19/15

(signature of auditor conducting visit)

NLRWWU WASTE SURVEY LIST

NAME OF BUSINESS	ADDRESS	SURVEY DATE	SIC# / NAICS#	COMMENTS
AAAMCO TRANSMISSION	4901 WARDEN RD. NLR, AR 72116	2/28/1989	7537	
AARON SECURITY SYSTEMS	P.O. BOX 276 NLR, AR 72115	3/15/1985	3499	
ABC SUPPLY CO., INC.	1650 E. WASHINGTON NLR, AR 72114	11/1/2011	5033, 5031	
ABC TREADCO INC.	1401 E. WASHINGTON NLR, AR 72114	3/15/1985	3011	
ACI PLASTICS, INC.	P.O. BOX 15356 LR, AR 72231	11/1/2011	3089	
ADAMS SIGNS	13702 FRANCIS ST. NLR, AR 72118	11/1/2011	3993	
ADVANCD FIBERGLASS, LLC	P.O. BOX 13268 NLR, AR 72113	11/17/2008	3089	
AIR COMPRESSOR EQUIPMENT CO.	1401 E. 2ND ST. NLR, AR 72114	3/15/1985	3533, 3561, 3563	
AIRMASTERS, INC.	3321 PIKE AVE. NLR, AR 72118	6/10/1991	3444, 3585	
AIRMASTERS, LLC.	4200 HERITAGE DR. NLR, AR 72117	~~11/17/2008~~	3585	
AIR ONE	6134 CARNEGIE DR.	5/12/2015		RETURNED / UNABLE TO LOCATE
ALL AMERICAN POLY CORP	309 PHILLIPS RD. NLR, AR 72117	11/1/2011	2673, 3081 / 32611, 326113	
ALLEN GRANITE INDUSTRIES, INC.	1800 E. 5TH ST NLR, AR 72114	11/1/2011	3281 / 327991	
ALLIANCE TECHNOLOGIES INC.	7051 DEWAFFLEBAKKER DR. NLR, AR 72113	3/5/2009	1171, 1731	
ALLIED PRINTING & SUPPLY	515 MAIN ST. NLR, AR 72114	11/1/2011	2752 , 2759 / 323100	
ALLISON & ASSOCIATES	P.O. BOX 94895 NLR, AR 72190-4895	11/1/2011	3841, 3846, / 326100	
ALLSTAR GLASS	1118 E. WASHINGTON AVE. NLR, AR 72114	2/28/1989	7536	
ALLSTATE TRANSMISSION SERVICE	2100 WEST 38TH NLR, AR 72114	~~2/28/1989~~	7537	
ALTURA GRAPHICS	717 MAIN ST. NLR, AR 72114	9/23/2015	3993, 5414, 3006	
ALUMINUM RECYCLING CORP.	P.O. BOX 628 LITTLE ROCK, AR 72203	6/7/1989	423930	
AMERICAN COMPOSTING	11911 FAULKNER LAKE RD. NLR, AR 72117	11/1/2011	2875 / 325314	
AMERICAN EXCELSIOR COMPANY	P.O. BOX 5818 NLR, AR 72119	3/15/1985	3079	
AMERICAN HERITAGE SHUTTERS	23 MINE HILL DR. NLR, AR 72118	11/1/2011	2842 / 325612	
AMERICAN REPELLANTS INC.	1200 JAMES RD. NLR, AR 72118	6/10/1991		MOVED OUT OF STATE
AMERICAN SHIFTY CORP.	2102 E. BROADWAY NLR, AR 72117	3/3/1989	3714, 5013	
AMERICAN WHOLESALE GLASS	P.O. BOX 9450 NLR, AR 72119	11/1/2011	5039	
APPLLIED COATING TECHNOLOGY INC.	6145 GETTY DR. SHERWOOD, AR 72117	2/28/1989		MOVED OUT OF STATE
ARCOM SYSTEMS, INC.	5200 NORTHSHORE LN. NLR, AR 72118	~~11/1/2011~~	5063	
ARKANSAS AUTOSPORT LLC	6111 CARNEGIE DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
ARKANSAS BLENDING SYSTEM	8824 BARNDER RD. NLR, AR 72117	3/21/1997	NO LONGER EXISTS	NO LONGER EXISTS
ARKANSAS DIESEL ENGINES	7504 COUNTS MASSIE RD. NLR, AR 72113	~~1/18/2011~~		SEPTIC SYSTEM
ARKANSAS INDUSTRIAL COMPUTING	6100 GETTY DR. NLR,A R 72117	5/12/2015		
ARKANSAS INDUSTRIAL MACHINERY, INC.	3804 N. NONA ST. NLR, AR 72118	11/1/2011	3563 / 333912, 423830	
ARKANSAS OPTICAL	1316 MAIN ST. NLR, AR 72114	11/1/2011	3851 / 339100	
ARKANSAS PACKAGING PRODUCTS INC.	7701 INDUSTRY DR. NLR, AR 72117	11/1/2011	5084 / 423840	
ARKANSAS TOOL & DIE	1317 ORANGE ST. NLR, AR 72114	11/1/2011	332116 / 333514	
ARKANSAS TRANSPORT CO., INC.	100 W. EMILY NLR, AR 72117	7/24/1989	4212	
ARKANSAS TURBO, INC.	314 LAKE LN. NLR, AR 72117	11/1/2011	3714	
ARK-CRETE BLOCK CO., INC.	1600 E. 5TH NLR, AR 72119	1/10/2012	3271 / 327331	
ARMOR SEWER CLEANING MACHINES	18 REMOUNT RD. NLR, AR 72118	3/15/1985	7699	
ARNOLD FIREWORKS, INC.	6124 MACARTHUR DR. NLR, AR 72118	2/1/2012	5092	
ASCO HARDWARE CO.	400 MAGNOLIA NLR, AR 72114	1/10/2012	5072	
ATC MICROBIOLOGY, INC.	5004 E. BROADWAY NLR, AR 72117	3/5/2009	8734	
AUDIO INTERNATIONAL, INC.	7300 INDUSTRY DR. NLR, AR 72117	5/4/2000	3651	

Attachment A-1

AUTO-CHLOR SYSTEM	6145 GETTY DR. SHERWOOD, AR 72117	5/12/2015	2841, 2842	
AUTOS-MAGAZINE.COM	3807 MCCAIN PARK DR. STE. 106 NLR, AR 72116	1/10/2012	5963	
AVIONICS & SYSTEMS INTEGRATION GROUP	10 COLLINS INDUSTRIAL PL. 3-B NLR, AR 72113	1/10/2012	3728, 3769, 3694 / 541330, 336322	
B & B AUTO REPAIR	4314 E. BROADWAY NLR, AR 72117	2/28/1989	7538	
BALLENTINE IRON WORKS	6200 CRYSTAL RD. NLR, AR 72118	3/15/1985	3446	
BAMAR PLASTICS, INC.	6136 GETTY DR. SHERWOOD, AR 72117	2/28/1989	3089	
BARTON FREIGHT LINER	11700 VALENTINE RD. NLR, AR 72117	2/15/2000	3715, 3799	
BASS, INC.	1215 PARKWAY DR. NLR, AR 72118	2/28/1989		OFFICE ONLY, NO MFG. AT THIS SITE
BIFF'S COFFEE ROASTING, INC.	9107 WARDEN RD. NLR, AR 72120	2/1/2012	2095 / 311920	
BLANSETT PHARMACALS	6142 GETTY DR. NLR,A R 72117	5/12/2015		
BLOUNT ELECTRONICS	P.O. BOX 3511 NLR, AR 72117	3/15/1985	3811	
BOYS IN BLUE	7627 HARDIN DR. NLR, AR 72117	5/12/2015		
BPI	1316 NORTH HILLS BLVD. #1 NLR, AR 72114	1/10/2012	5032, 5023	
BRANDON CO.	401 VINE ST. NLR, AR 72114	2/1/2012	5039, 5023 / 423390	
BRENT AND SAM'S COOKIES	30 COLLINS INDUSTRIAL PLACE NLR, AR 72113	1/10/2012	2052	
BRIDGEWAY HOSPITAL	21 BRIDGEWAY RD. NLR, AR 72118	7/10/1992	8063	
BROCKINGTON PRINTING & GRAPHICS	6100 GETTY DR. NLR,A R 72117	5/12/2015		
BROWNIE'S OIL CO.	1221 E. 5TH NLR, AR 72203	12/9/1987	5984	
BROWN'S SHEET METAL INC.	32 FROSTWOOD DR. NLR, AR 72116	6/10/1991	3599	
BUCKS RADIATOR SERVICES	3123 1/2 PIKE AVE. NLR, AR 72114	2/28/1989	811118	
BUDGET TRANSMISSION SERVICE CO.	2100 W. 38TH ST. NLR, AR 72118	12/9/1987	7537	
BURTON/SEQUOIA SAW & SUPPLY	4300 OAK GROVE RD NLR, AR 72118	9/23/2015	5085	
CAE VANGUARD, INC.	4007 RICHARDS RD. NLR, AR 72117	9/23/1993	3743	
CAMPBELL SHEET METAL	1207 E. 5TH NLR, AR 72117	1/10/2012	3599	
CAPITAL FIRE EXTINGUISHER CO.	6100 GETTY DR. NLR,A R 72117	5/12/2015		
CAPITOL STARTER SERVICE CORP.	6230 GETTY DR. NLR, AR 72117	5/12/2015		
CARTER ENTERPRISES, JOE	4310 MACARTHUR DR. NLR, AR 72118	1/10/2012	5251	
CENTRAL ARKANSAS AUTOBROCKERS	6111 CARNEGIE DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
CENTRAL ARKANSAS TRANSIT	901 N. MAPLE NLR, AR 72114	12/30/1991	4111	
CENTRAL GLASS & MIRROR CO. INC.	7608 HARDIN DR NLR, AR 72117	5/12/2015	238150	
CENTRAL LOCATING SERVICE	10507 MAUMELLE BLVD. NLR, AR 72113	8/26/1998		
CENTRO, INC.	7600 HARDIN DR. NLR, AR 72117	5/12/2015	5085	
CHAPMAN SERVICES INC.	6111 CARNEGIE DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
CHEYENNE INDUSTRIES	4901 FAIRWAY AVE. STE. A NLR, AR 72116	9/23/2015	3645,3646/335121	
CHILL & GRILL	6100 GETTY DR. NLR,A R 72117	5/12/2015		
CLARKDALEM, INC.	806 MAPLE ST. NLR, AR 72114	3/15/1985	3832	
CLAUDIA'S CANINE CUISINE	1807 W. 37TH PLACE NLR, AR 72118	1/14/2005	2047	
CMC CONST. LOFLAND	700 DIXIE ST. NLR, AR 72114	1/10/2012	3449, 3441 / 332312	
CMC REBAR	700 DIXIE ST. NLR, AR 72114	2/1/2012	3449, 3441 / 332312	
COLOUR & DESIGN, INC.	10024 MAUMELLE BLVD. NLR, AR 72113	2/1/2012	3089	
COMMERCIAL BEVERAGE EQUIPMENT, INC.	3517 E. BROADWAY NLR, AR 72114	2/1/2012	3559	
COMMERCIAL LUMBER SALES INC.	102 OAKLEY DR. NLR, AR 72114	2/1/2012	2491 / 321114	
CONCORD BOATS	7901 WARDEN RD. SHERWOOD, AR 72116	3/18/1994	3732	
CONE SOLVENTS INC.	2228 AIRPORT RD. NLR, AR 72117	1/21/2009	5169	
CONSOLIDATED PIPE & SUPPLY CO., INC.	400 PHILLIPS RD. NLR, AR 72117	2/1/2012	5051, 5162	
CONTINENTAL TRAILWAY	600 N. BROADWAY NLR, AR 72114	12/9/1987	4173	
COULSON OIL CO., INC.	1434-37 PIKE AVE. NLR, AR 72114	2/1/2012	5171	
COX MACHINE & FABRICATION INC.	2800 PIKE AVE. NLR, AR 72114	11/17/2005	3599	
CRANFORD ASPHALT CO.	5000 BETHANY RD. NLR, AR 72117	4/2/1985	2591 / 324121	

CRANFORD CONSTRUCTION CO.	P.O. BOX 15010 NLR, AR 72231	2/1/2012	2951 / 324121	
CRITTER GETTERS	6115 CARNEGIE DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
CROCKETT BUSINESS MACHINES, INC.	5001 NORTHSHORE LN. NLR, AR 72118	2/1/2012	5044, 5045, 5065, 5021	
CROW CHEMICAL CO.	1201 N. PINE ST. NLR, AR 72114	1/20/1988	5169	
CROWN MILLWORK	1605 E. 5TH NLR, AR 72119	12/9/1987	2434, 2431 / 337110	
CTEH	5120 NORTHSHORE DR. NLR, AR 72118	1/29/2009	541620	
CUMMINS MID SOUTH	3115 HWY 391 NORTH NLR, AR 72117	11/16/2009	3519, 3599	
CUSTOM AIRCRAFT CABINETS, INC.	5510 Landers Rd. NLR, AR 72117	12/1/2012	3728 / 336413	
CUSTOM CARPENTRY MILLWORK	10585 MAUMELLE BLVD. NLR, AR 72113	2/1/2012	2511, 2431 / 321900	
CUSTOM KRAFT	4611 W. BETHANY NLR, AR 72117	2/9/2005	7542, 3589, 2841 / 333319	
CUSTOM PRINTING CO., INC.	1724 PIKE AVE. NLR, AR 72114	2/1/2012	2759 / 323100	
DANIEL LABEL PRINTING, INC.	3125 E. WASHINGTON AVE. NLR, AR 72114	3/22/2012	2759, 2752 / 323100	
DAVE'S REFINISHING SHOP	802 E. KIEHL AVE. SHERWOOD, AR 72116	2/28/1989	238350	
DECKRITE, LLC	3912 E. PROGRESS NLR, AR 72114	3/22/2012	2426	
DESCO COATINGS	6131 CARNEGIE DR. NLR,A R 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
THE DESIGN GROUP	5704 MACARTHUR DR. NLR, AR 72118	3/22/2012	3993	
DEWAFELBAKKERS	10000 CRYSTAL HILL RD. NLR, AR 72113	3/22/2012	5140, 2053 / 311813	
DIAMOND INTERNATIONAL TRUCKS INC.	11401 DIAMOND DR. NLR, AR 72117	12/15/2000	423110	
DJS AUTO CARE	6103 CARNEGIE DR. NLR, AR 72117	5/12/2015		
DON WEESE NC.	7613 HARDIN DR. NLR, AR 72117	5/12/2015		
DYER CO., INC.	6128 CARNEGIE DR. NLR, AR 72117	2/28/1989	333991	
DOUBLE - D RADIATOR SHOP	622 WEST 4TH NLR, AR 72114	9/6/2006	7539	
D W M CONSTRUCTION, INC.	211 Grant Park Circle NLR, AR 72231	3/22/2012	3444	
EDWARDS SHEET METAL WORKS, INC.	9320 MAUMELLE BLVD. NLR, AR 72118	6/10/1991	3444	
ELLIS JEWELERS, INC.	2927 LAKEWOOD VILLAGE DR. NLR, AR 72116	3/22/2012	3479 / 339911	
ENGINEERED SALES, INC.	8100 INDUSTRY DR. NLR, AR 72117	3/22/2012	5084	
EYE CATCHING DÉCOR	6127 CARNEGIE DR. NLR, AR 72117	5/12/2015		NO LONGER AT THIS ADDRESS
E-Z OXYGEN, LLC.	1101 E 5TH NLR, AR 72114	11/2/2011	532291	
FAB-RON, INC.	725 PIKE AVE. NLR, AR 72114	3/22/2012	5084	
FACECRAFTERS, INC.	6204 HWY 161 NLR, AR 72114	3/22/2012	3993	
FARMER BROTHERS COFFEE	7630 HARDIN DR. NLR, AR 72117	5/12/2015		
FARRELL CUSTOM FURNITURE, INC.	1601 E. 5TH STE. C NLR, AR 72114	3/22/2012	2521, 2436, 2435 / 337211	
FASTENAL CO.	10300 RIVERVIEW CORPORATE DR. NLR, AR 72113	3/22/2012	5072, 5084, 5085	
FAULKNER AUTOMOTIVE WAREHOUSE, INC.	6149 GETTY DR. NLR, AR 72117	5/12/2015	5013	
FERRELLGAS, INC.	424 N. SMOTHERS ST. NLR, AR 72114	3/22/2012	5172, 5169	
FIB-R-DOOR	1751 E. 5TH ST. NLR, AR 72114	3/22/2012	3089	
FISCHER'S HONEY CO.	2001 N. POPLAR NLR, AR 72114	3/22/2012	2099	
FORKLIFT SERVICES	3609 CRUTCHER ST. NLR, AR 72118	12/1/1995	811310	
FRALEY ROOFING INC.	6110 CARNEGIE DR. NLR, AR 72117	5/12/2015		
FRESNO VALVES & CASTING, INC.	17 TAHARA ST. NLR, AR	3/22/2012	3491, 3544, 3442 / 332911	
FUNK MANUFACTURING	300 TRAMMELL RD. SHERWOOD, AR 72124	3/22/2012	3523, 3444	
GENERAL PACKAGING & EQUIPMENT	P.O. BOX 5068 NLR, AR 72119	3/15/1985	3569	
GENERAL TCOL & ENGINEERING	3904 E. PROGRESS ST. NLR, AR 72114	3/22/2012	3599	
GENESIS PRINTING CO., INC	1313 N. HILLS BLVD. STE. 310 NLR, AR 72114	3/22/2012	2759 / 323100	
GERDAU AMERISTEEL US, INC.	406 N. LOCUST ST. NLR, AR 72119	3/22/2012	3449, 5032	
GIFFORD TOOL & DIE, INC.	P.O. BOX 3468 NLR, AR 72117	3/15/1985	3544	
G.L. TURNER CO., INC.	P.O. BOX 5652 NLR, AR 72119	3/15/1985	3524	
GLAZER'S OF ARKANSAS	11101 SMITTY LANE NLR, AR 72117	3/22/2012	5182	
GLOVER'S TRANSMISSION & REAR END, INC.	1527 E. BROADWAY NLR, AR 72114	2/28/1989	3519, 3714	

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GLOVER'S TRUCK PARTS & EQUIPMENT	1200 BAUCUM INDUSTRIAL DR. NLR, AR 72117	3/22/2012	3519, 3714	
GLOVER EQUIPMENT CO.	1705 E. 5TH NLR, AR 72114	12/9/1987	3519	
GOLF CARS OF ARKANSAS	6122 CARNEGIE DR. NLR, AR 72117	5/12/2015		
GRACE & CO. CONSTRUCTION PRODUCTS	P.O. BOX 294 NLR, AR 72115	12/9/1987	3295	
GRACE COMMUNICATION	715 BROADWAY NLR, AR 72114	9/23/2015	443112	
GRAY SUPPLY CO., INC.	P.O. BOX 961 NLR, AR 72115	2/28/1989	5112	
GREAT DANE TRAILERS	9901 DIAMOND DR. NLR, AR 72117	2/15/2000	811121	
GREEK 4 LIFE	4231 E MCCAIN / P.O. BOX 815 NLR, AR 72115	9/23/2015	2396,2759,2395/323100	
HALBERT PIPE & STEEL CO.	415 N OLIVE ST/P.O. BOX 5637 NLR, AR 72119	9/23/2015	5051	RETURNED / UNABLE TO LOCATE
HALL MANUFACTURING CO.	3706 E. WASHINGTON AVE. NLR, AR 72114	3/22/2012	3523, 3524	
HALL TANK CO.	2001 E 5TH ST / P.O. BOX 5787 NLR, AR 72119	9/23/2015	3443	
HANEY AUTO SUPPLY	4503 E. BROADWAY NLR, AR 72117	2/28/1989	5013	
HARDIN MARINE, INC.	7601 HARDIN DR. NLR, AR 72117	3/15/1985	3519, 3429	
HARPER SHEET METAL WORKS	3924 NONA ST NLR, AR 72118	9/23/2015	3444	
HARVEY SHEET METAL	7914 HWY 70 NLR,A R 72117	9/23/2015	3444	SEPTIC SYSTEM
H D SUPPLY WATERWORKS	3209 HWY 161 NLR,A R 72117	9/23/2015	423720	
HEPACO INC.	7601 HARDIN DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
HENLEY'S WHOLESALE MEATS, INC.	28 REMOUNT RD. NLR, AR 72118	12/9/1987	5147	
HERITAGE CRYSTAL CLEAN, LLC	#1 HAROLD IVES DR. NLR, AR 72117	8/8/2011	424690	
HERITAGE PRESS, INC.	4200 HERITAGE DR. NLR, AR 72117	3/15/1985	2711, 2751	
HERITAGE PUBLISHING	2401 WILDWOOD AVE. NLR, AR 72120	4/2/1997	561422	
HIGGINS AUTOMATIC TRANSMISSION SVC.	305 N. BUCKEYE NLR, AR 72114	2/28/1989	7537	
HILL CABINETS, INC.	1010 N. BEECH ST. NLR, AR 72114	9/23/2015	2434.2541/337110	
HILLIARD ENTERPRISES	25221 HWY 365 N / P.O. BOX 13687 NLR, AR 72113	9/23/2015	5088, 5063, 5084	SEPTIC SYSTEM
HINER OILS, INC.	1101 E 5TH NLR, AR 72114	12/9/1987	424720	
HODGE FABRICATIONS, INC.	6206 BAUCUM PIKE / P.O.BOX 17005 NLR, AR 72117	9/23/2015	3441, 3499, 3599	SEPTIC SYSTEM
HORTON BROTHERS PRINTING CO., INC.	301 W. 4TH NLR, AR 72114	3/15/1985	2751	
HOUCO METAL PRODUCTS CO., INC.	P.O. BOX 1021 NLR, AR 72115	3/15/1985	3325	
ICI AMERICAS, INC.	824 E. 12TH NLR, AR 72114	8/1/1991	2879	
IDEAL BAKERY	4320 LANDERS RD. NLR, AR 72117	12/9/1987		NO LONGER EXISTS
IHP INDUSTRIAL INC.	3201 E. KIEHL AVE. SHERWOOD, AR 72116	2/28/1989	423840	
IMAGES PRINTING	4702 JFK BLVD. NLR, AR 72116	9/23/2015	561439	
INFANT FORMULAS INC.	7625 COUNTS MASSIE RD. NLR, AR 72113	5/3/2005		
INNERPLAN OFFICE INTERIORS	7001 INNERPLAN DR. NLR, AR 72113	11/1/2011	5021	
INSTANT PRINT	3131 JFK BLVD. NLR, AR 72116	3/15/1985	2752	
INX INTERNATIONAL INK CO.	1309 NORTH HILLS BLVD. NLR, AR 72114	3/21/1997	2893	
JASON INTERNATIONAL, INC.	8328 MACARTHUR DR. NLR, AR 72118	10/28/1998	3088 / 326191	
JEFFREY CLYBURN SIDING & WINDOWS	6146 GETTY DR. NLR, AR 72117	5/12/2015		
JEFFREY SAND CO.	2200 LINCOLN AVE / P.O. BOX 9054 NLR, AR 72119	9/23/2015	1442/212321	
JERRY'S ALUMINUM DOOR & SCREEN	109 SAUNDERS DR NLR, AR 72117	9/23/2015	3442/332321	
JFK SERVICE CENTER	4120 JFK BLVD. NLR, AR 72116	2/28/1989		
JOHN NORRELL, INC.	1203 NORTH PINE NLR, AR 72114	7/13/2009		
J & R AUTO WHOLESALE	6100 GETTY DR. NLR,A R 72117	5/12/2015		OUT OF BUSINESS
K. C. BAKING POWDER	3401 E. BROADWAY NLR, AR 72115	12/9/1987		
KETCHER & COMPANY, INC.	1717 E. 5TH NLR, AR 72119	3/15/1985		
KILGORE SAW CO.	6723 LUMSDEN RD NLR, AR 72118	9/23/2015	3425/332213	
KINGS COINS ET.	6128 CARNEGIE DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
KOEHLER BAKERY CO.	5902 WARDEN RD. NLR, AR 72120	2/15/2000	2053	
KOOLVENT ALUMINUM AWNING CO.	3904 E. BROADWAY NLR, AR 72114	3/15/1985	3442, 3444	

LAFFERTY EQUIP MFG	5614 OAK GROVE RD NLR, AR 72118	9/23/2015	332999, 332291, 333294, 333319	SEPTIC SYSTEM
LASITER ASPHALT MAINTENANCE CO., INC.	398 S. VINE ST. NLR, AR 72114	2/3/1994	1611	
LOFLAND COMPANY OF ARKANSAS	700 DIXIE ST. NLR, AR 72114	6/10/1991	3441	
LOW VOLTAGE SYSTEMS, INC.	4528 DAWSON DR. NLR, AR 72116	9/23/2015	3669,3861/334290	
M3 COSMETIC LABS	1305 NORTH HILLS BLVD. #109 NLR, AR 72116	5/5/2010		
MASCO, INC.	P.O. BOX 157 NLR, AR 72115	12/9/1987	3569	
MAIL FACILITY	4700 E. MCCAIN BLVD, NLR, AR 72116	8/11/1994		
MAX'S TRANSMISSION SERVICE	225 E. 13TH ST. NLR, AR 72114	2/28/1989		
MECHANICS LUMBER CO.	1501 E. 5TH NLR, AR 72119	6/10/1991	2431	
METAL RECYCLING CORP.	1 RIVERFRONT PL. NLR, AR 72203	2/28/1989		
MID SOUTH TRUCK PARTS	624 E. 12TH NLR, AR 72116	3/3/1989		
MID-SOUTH SEEDS, INC.	2 OAKLEY DR. NLR, AR 72119	12/9/1987		
MID-STATE TOOL AND MACHINE	RT.3 BOX 233A NLR, AR 72116	6/10/1991	3549 / 333518	
MINCEY AUTO MACHINE CO.	2723 E. BROADWAY NLR, AR 72114	12/21/1992		
MOC CENTRAL LLC	6100 GETTY DR. NLR,A R 72117	5/12/2015		
MOUNTAIRE FEEDS, INC.	124 E. 5TH NLR, AR 72114	12/9/1987	2048	
NATIONAL TRAVLERS RV CENTER	6027 WARDEN RD. SHERWOOD, AR 72116	2/28/1989		
NATIONAL WALLCOVERING, INC	10020 MAUMELLE BLVD. NLR, AR 72113	9/23/2015	2679	
NICKS MACHINE SHOP	15013 CEDAR HEIGHTS RD NLR, AR 72118	9/23/2015	3599	SEPTIC SYSTEM
NLR STARTER & ALTERNATOR	2705 E. BROADWAY NLR, AR 72114	2/28/1989		
NLR SOFTWATER INC.	131 W. MILITARY DR. NLR, AR 72118	2/15/2000		
NLR TIMES	400 W 26TH ST. NLR, AR 72114	11/21/2005	2711	
NOARK ENTERPRISES, INC.	10101 HWY 70 E. NLR, AR 72117	9/23/2015	3086/326100	
NORTH POINT FORD	4400 LANDERS RD. NLR, AR 72117	6/18/1991		
ONYX LABORATORIES, LTD.	9600 ROWLETT RD. NLR, AR 72113	11/1/2011	2844 / 325600	
PAPER STOCK DEALERS, INC.	810 W. 8TH NLR, AR 72114	2/28/1989		
PETERBILT OF LITTLE ROCK	#1 PETERBILT DR. NLR, AR 72231	8/10/1995		
PETROLEUM FUEL & TERMINALING CO.	3206 GRIBBLE ST. NLR, AR 72114	8/17/1992		
PHILLIPS INTERNATIONAL	P.O. BOX 5759 NLR, AR 72119	8/25/1995		
PINNACLE SIGNS & GRAPHICS	10 COLLINS INDUSTRIAL STE 4-A NLR, AR 72113	9/23/2015	541890, 541430	
PLUS PARTS AUTO SALVAGE	8512 CONWAY HIGHWAY NLR, AR 72118	2/28/1989		
PLYMOUTH BUILDING PRODUCTS	6148 GETTY DR. NLR, AR 72117	5/12/2015		
POJOAQUE PUEBLO SERVICES	6136 GETTY DR. NLR, AR 72117	5/12/2015		
POLLUTION CONTROL, INC.	5301 MCCLANAHAN STE.D-8 NLR, AR 72116	4/21/2009		
PREDISENT BAKING CO., INC.	123 S. OLIVE ST. NLR, AR 72114	4/2/1997		
PRIME QUALITY FEED	124 E. 5TH NLR, AR 72114	2/16/2000	2048	
PRODUCE EQUIPMENT CO.	412 W. 8TH NLR, AR 72118	3/15/1985	3551, 3554	
PRODUCTION ASSISTANCE LINK, INC.	401 N. PALM ST. NLR, AR 72114	9/23/2015	2899, 2851 / 325510, 324191	
PROFESSIONAL COATINGS, INC.	5514 CRUSTAL HILL RD. NLR, AR 72118	3/21/1997		
PROSPECT STEEL, INC.	4611 W. BETHANY NLR, AR 72117	6/10/1991		
PTS PROCESSING	1300 E 12TH ST. NLR, AR 72114	9/23/2015	3312,3441/332312	
PULASKIE PUBLISHING CO.	P.O. BOX 428 NLR, AR 72114	3/15/1985	2711	
QUADEX INC.	4801 CRYSTAL HILL RD. NLR, AR 72118	9/23/2015	237110	
QUALITY BEARING SERVICE	1 336 HENDRSON DR. NLR, AR 72114	9/23/1994	3562, 3471	
QUALITY CHURCH FURN.	501 N. VINE NLR, AR 72115	12/29/1987		
QUICKRETE MATERIALS	315 PHILLIPS RD. NLR, AR 72117	12/9/1987		
RAIL BEARING SERVICE CORP.	1100 N. HENLOCK NLR, AR 72114	5/16/1995		
RAM INDUSTRIES, INC.	7200 INDUSTRY DR. NLR, AR 72117	8/1/1995	2499, 3281	
RAMA COSMETICS (RBP)	6150 GETTY DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE

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RAMAS BEAUTY PRODUCTS (RBP)	6150 GETTY DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
RANK VIDEO	9201 FAULKNER LAKE RD. NLR, AR 72117	8/1/1995		
RANKIN CONSTRUCTION CORP	6135 GETTY DR. NLR, AR 72117	5/12/2015	236220, 238110, 238190, 238160	
RAZOR CHEMICAL, INC.	1305 NORTH HILLS BLVD. #119 NLR, AR 72114	6/13/2011	2842 / 325612	
RBP	6150 GETTY DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
REALIST BLOUNT INDUSTRIES	P.O. BOX 3511 NLR, AR 72117	3/15/1985	3811	
RECYCLES MOTOR SPORTS	7633 HARDIN DR. NLR, AR 72117	5/12/2015		
RELIABLE FIRE PROTECTION, LLC	5510 LANDERS RD. STE. B NLR, AR 72117	12/18/2012	1711 / 423850	
RICK STAPLES CONSTRUCTION CO. INC.	7613 HARDIN DR. NLR, AR 72117	5/12/2015		NO LONGER IN NLR
RIVER CITY HYDRAULICS	6190 GETTY DR. SHERWOOD, AR 72116	12/28/1989		
River City Specialties (Target Wraps)	4545 W. Bethany Rd. NLR, AR 73227	2/5/2015		
RIVERSIDE, INC.	2501 BAY OAKS ST / P.O. BOX 1059 NLR, AR 72115	9/23/2015	3446 / 332323	
RIVERVIEW PARADISE	10750 CRYSTAL HILL RD. NLR, AR 72113	2/15/2000		
RIXEY IRON & METAL CO.	8033 OLD JACKSONVILLE HWY. NLR, AR 72117	2/28/1989		
ROCK SOLID DESIGNS	4320 E 43RD ST. NLR AR 72117	9/23/2015	3272, 2542, 2899	RETURNED / UNABLE TO LOCATE
RUBBER & GASKET CO. OF AMERICA (RGA)	3895 E. PROGRESS NLR, AR 72114	9/23/2015	3052,3053,3061/326220	
RUSH INK	6111 CARNEGIE DR. NLR, AR 72117	5/12/2015		
RUTHERFORD STEEL CORP.	P.O. BOX 464 NLR, AR 72115	3/15/1985	3441	
SALMON & SONS, INC.	4806 E. MCCAIN NLR, AR 72117	1/9/1992	4213	
SANTA CECILIA DESIGN	6136 GETTY DR. NLR, AR 72117	5/12/2015		
SCHAEFFER OIL CO.	6111 CARNEGIE DR. NLR, AR 72117	5/12/2015		
THE SCOOTER STORE	6143 GETTY DR. NLR, AR 72117	5/12/2015		OUT OF BUSINESS
SEATON HEAT & AIR	6100 GETTY DR. NLR,A R 72117	5/12/2015		
SECURITY PRODUCTS CO.	403 MAGNOLIA NLR, AR 72114	3/15/1985		
SHINE INDUSTRY, INC. dba CHEYENNE INDUSTRIES LLC.	4901 FAIRWAY AVE. STE. A NLR, AR 72116	9/23/2015	3643,3645/335121	
SHORTY'S AUTOMATIC TRANSMISSION PARTS	1507 W. 38TH NLR, AR 72114	12/28/1989		
SIGNS FIRST	1601 CYPRESS ST. NLR, AR 72114	9/23/2015	3993	
SILVERMATE CO	1201 PINE ST / P.O. BOX 16565 LR, AR 72231	9/23/2015	2842/325612	
SIMPLEXGRINNELL LP	9700 MAUMELLE BLVD NLR, AR 72113	9/23/2015	3669,3663,3679/334290	
SKATEPAIGE.COM	4000 PIKE AVE. NLR, AR 72118	9/23/2015	3949	
SOOS STAINED GLASS, INC.	30 MAUMELLE CURVE CT. NLR, AR 72113	9/23/2015	3231/327215	
SOUTHERN COATING & NAMEPLATE	6200 GETTY DR. SHERWOOD, AR 72116	5/12/2015	3993, 3499, 2762 / 322222, 323113	
SOUTHERN FARMERS ASSOC.	825 N. PALM NLR, AR 72119	4/2/1997		
SOUTHERN SQUARES CO., INC.	821 E. 5TH NLR, AR 72114	6/10/1991	2426	
SOUTHWEST FREIGHT DIST.	3701 E. PROGRESS NLR, AR 72114	11/9/1987		
SOUTHWESTERN TRUCK SALES	3815 E. BROADWAY NLR, AR 72119	2/28/1989		
SPECTRA METAL SALES, INC.	1805 E. 5TH NLR, AR 72114	7/13/2009		
STANLEY STEAMER	7619 HARDIN DR. NLR, AR 72117	5/12/2015	7217/561740	
STEPHEN J. BARKER ARCHCT.	6137 GETTY DR. NLR, AR 72117	5/12/2015		
STITCH CONNECTIONS	6127 CARNEGIE DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
SUNBELT COURIERS, INC.	1000 N. VINE NLR,AR 72114	1/9/1992		
SUPERIOR WELDING SERVICE	9802 HWY 165 NLR, AR 72117	9/23/2015	3631,3448/335221	
TARGET TORQUE CONVERTE R SERVICE CO.	2114 W. 38TH NLR, AR 72118	12/9/1987	3566 / 333612	
TC PRINT SOLUTIONS	4150 E 43RD ST / P.O. BOX 15368 LR, AR 72235	9/23/2015	2759/323100	
TENENBAUM RECYCLING GROUP LLC.	4500 W. BETHANY NLR, AR 72117	11/1/2011	5093 / 423930	
TFC INC.	9320 MAUMELLE BLVD. NLR, AR 72118	9/23/2015	3312	
TRI STAR INDUSTRIAL EQUIPMENT CO.	7628 HARDIN DR. NLR, AR 72117	5/12/2015		
T SHIRT SHOP	4623 ORANGE ST NLR, AR 72118	9/23/2015	2396, 2261 / 313311	
TURNER & ASSOCIATES PA.	6130 GETTY DR. NLR,A R 72117	5/12/2015		RETURNED / UNABLE TO LOCATE

TWIN CITY OIL CO.	3519 E. BROADWAY NLRR, AR 72117	12/9/1987		
TWIN CITY PRINTING & LITHO, INC.	4150 E. 43RD ST. NLR, AR 72117	3/15/1985	2752, 2795	
ULTIMATE TECHNICAL ACADEMY	6108 GETTY DR. NLR, AR 72117	5/12/2015	8249	TRADE SCHOOL
ULTRA CLEAN OF ARKANSAS INC.	6100 GETTY DR. NLR,A R 72117	5/12/2015		
ULTRA CLEAN OF ARKANSAS INC.	7627 HARDIN DR. NLR, AR 72117	5/12/2015		
UNIFORCE ELECTRONICS CORP.	1805 E. 5TH NLR, AR 72114	12/9/1987	3622, 3714	
UNIQUE LAUNDRY & CLEANERS	4200 E. KIEHL SHERWOOD, AR 72116	2/28/1989		
UNITED ENGINES INC.	HWY 167 NORTH SHERWOOD, AR 72116	2/28/1989		
U.S. ROOTER	18 REMOUNT RD. NLR, AR 72118	3/15/1985		
UTC AEROSPACE SYSTEMS INTERIORS	7300 INDUSTRY DR. NLR, AR 72117	9/23/2015	334419, 33641	
VASSAR TRUCKING	8417 HWY 70 NLR, AR 72117	8/19/1992		
VICTORY BLUE	700 DIXIE ST. NLR, AR 72114	9/23/2015		
VIP CAR AUDIO	6105 CARNEGIE DR. NLR, AR 72117	5/12/2015		
W & S INSTALLATION, INC.	9125 COUNTS MASSIE RD. NLR, AR 72118	6/10/1991		
WACO MANUFACTURING, INC.	3700 CRUTCHER NLR, AR 72118	6/28/1991	3732, 3444	
WAGNER INDUSTRIES, INC.	1600 GREGORY NLR, AR 72114	3/5/2009	49311	
WATSON MACHINE & FABRICATION	1109 N. PINE NLR, AR 72117	3/11/1997	3599	
WAYNES AUTO MACHINE CO. INC.	6124 GETTY DR. NLR, AR 72117	5/12/2015		RETURNED / UNABLE TO LOCATE
WELSCO, INC.	9006 CRYSTAL HILL RD. NLR, AR 72113	3/15/1985	5169	
WHITE BAG CO, INC.	8027 HWY 161 N / P.O. BOX 15368 LR, AR 72231	9/23/2015	2673,2674,2759/314911	RETURNED / UNABLE TO LOCATE
WILLIAMS PACKAGING CO., INC.	3912 E. PROGRESS NLR, AR 72114	3/15/1985	3079	
WOODLINE MOTOR FREIGHT	2323 E. 8TH NLR, AR 72114	4/2/1997		

NORTH LITTLE ROCK WASTE WATER UTILITY

WASTEWATER SURVEY
FOR
NON-RESIDENTIAL ESTABLISHMENTS

SECTION A: GENERAL INFORMATION

1. Name of Business: _____
   Mailing Address: _____ Phone: _____
   _____
   _____
   Site Address: _____
   _____
   _____

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

3. Are there any discharges to the sanitary sewer other than domestic wastewater (restroom's and kitchen)? ____ YES ____ NO

SECTION B: PRODUCTS, SERVICES, WASTEWATER INFORMATION

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

2. What is the Standard Industrial Classification (SIC) Code(s) or the North American Industry Classification System (NAICS) code(s) for the business at this location?
   _____ _____ _____ _____

3. Number of employees at this location:
   Full time: _____
   Part time: _____
   Shifts worked per day: _____ Hours: _____ _____ _____

4. Work or production schedule at this location: (business hours if commercial)
   _____
   _____
   _____

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

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

Total Gallons: _____

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

_____
_____
_____
_____

6. Water use at this location (from water bill):
_____ thousands of gallons per month or
_____ hundreds of cubic feet per month or
_____ gallons per day

7. Under what name is the Central Arkansas Water (CAW) account listed; along with Account # and or Watermeter #

_____
_____

8. Is this business required to report discharges under EPA General Pretreatment Regulations (40 CFR 403)? ____YES ____ NO

9. Are wastewater pretreatment systems installed? ____YES ____NO
If yes, please describe type of treatment and capacity of system:

_____
_____
_____

SECTION C. CHEMICALS/STORAGE

1. Are bulk chemicals received and stored for use in this business? ____YES ____NO
If yes, please list chemicals used or stored (an approximate quantity):

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

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2. Please list raw materials and process additives used:

_____
_____
_____
_____

3. Is a spill containment and control plan in use? ____YES ____NO

4. Is production subject to seasonal variation? ____YES ____NO
If yes, please describe seasonal cycle: _____
_____
_____
_____

5. Are any process changes or expansions planned in the next three years? ____YES ____NO
If yes, attach a separate sheet describing nature of planned changes or expansions.

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

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

Signature: _____ Date: _____

Name: _____

Title: _____

Return completed form to:

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

Form revised: 6-5-14 ET

A-1j

September 23, 2015

Shine Industry, Inc.
4901 Fairway Ave. Ste. A
North Little Rock, AR 72116

Cert# 7007 0710 0000 0749 5221

Re: Waste Survey

Dear Sir:

The North Little Rock Waste Water Utility operates an Industrial Pretreatment Program. As part of this program we are conducting a survey on non-residential contributors who may have the potential to impact our system.

Please fill out the enclosed Waste Survey Form and return to the following address no later than October 23, 2015:

North Little Rock Waste Water Utility
Industrial Pretreatment Dept.
P.O. Box 17898
North Little Rock, AR 72117

Thank you for your cooperation.

NORTH LITTLE ROCK WASTE WATER UTILITY

Beth Caipen
Pretreatment Clerk

A-1K

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

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	8,00(	
Sanitary	8,00(	
Air Pollution Control	N/A	
Contained in Product	N/A	
Plant & Equipment Washdown	3,00(	
Irrigation & Lawn Watering	3,00(	
Other		
Total	33,00	

If your facility employs or will be employing p
or business activities listed below (regardless o
sludge, or hazardous wastes), place a check be
(check all that apply)

( ) Aluminum Forming

( ) Asbestos Manufacturing

( ) Battery Manufacturing

( ) Can Making

( ) Carbon Black

( ) Coal Mining

A2c

( ) 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

A-2d

( ) 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

NAICS # 333120

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.

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 plar
discharges from entering the Control Authority

The facility is in the process of develc
Countermeasure Plan in accordance with
regulations. A copy of this plan will be provi
finalizaion.

Describe any previous spill events and remedia
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 n
the start of the activity to its completion, sh
processes use water and which generate wa
and maximum daily volume of each waste
each unit process having wastewater disch

Is any form of wastewater treatment practi

Is any form of wastewater treatment or cha
planned for this facility within the next thr

New facility, see attached diagrams and pl

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.

Name	Title
Signature	Date

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Attachment A-3

Company Name: Caterpillar Inc.
NAICS Number: 333120
Classification: Construction Machinery Manufacturing (MOTOR GRADERS)
Permit number: 2016080125

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: **2016080125**

Effective Date: **SEPTEMBER 1, 2012**

Expiration Date: **AUGUST 31, 2016**

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 Utility's sanitary sewer 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

Marc Wilkins
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.

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(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.

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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.

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(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.

A-3e

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.

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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.

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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.

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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.

A-3j

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.

A-3K

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.

A-3n

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)	DAILY
Flow	Report

(SP-001) PARAMETER	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)	DAILY
Flow	Report

(SP-002) PARAMETER	DAILY MAXIMUMS	MONTHLY AVERAGE SHALL NOT EXCEED
BOD	1000 mg/L	1000 mg/L
TSS	1000 mg/L	1000 mg/L
O&G	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.

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(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	24HC
Chromium (T)	One/Month	24HC
Copper (T)	One/Month	24HC
Lead (T)	One/Month	24HC
Nickel (T)	One/Month	24HC
Silver (T)	One/Month	24HC
Zinc (T)	One/Month	24HC
Cyanide (T)	One/Month	24HC
* 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
O&G	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)]

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SECTION 7 – SIGNATORY REQUIREMENTS

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

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

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

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

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

    (b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, superintendent, or position of equivalent responsibility. The individual shall be a legal resident and reside within the State of Arkansas.

Any person signing a document under this section shall make the following certification;

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

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SECTION 8 – SAMPLING / MONITORING STATION

Sampling / Monitoring Station is required for sampling point (SP-001).
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.

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.

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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.

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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)**

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Attachment A-4

Caterpillar (Fact Sheet?)

Facility brings in pre-fab hot and cold rolled steel parts for final painting, assembly, and testing of motor graders. Raw materials on-site include phosphoric acid, Caterpillar yellow and black paint, hydraulic fluid, motor and gear oils, anti-freeze and diesel fuel for final pressure check and adjustment before graders are sent out as a finished product.

The facility pretreats two separate waste streams; the pressure check and adjustment (PCA) area with oil water separator and the coatings side with chemical precipitation and clarifier to remove metals to meet 40 CFR 433.17 Metal Finishing Standards. Small parts receive a powder coat while large ones are sprayed with liquid paint.

Metal finishing process is a typical alkaline bath and rinse, phosphoric bath and rinse prior to application of liquid paint or powder coat. Concrete containment surrounds the phosphatizing lines which are designed to hold entire volume of system plus 10%. 500 GPD backwash from make-up water filtration system is routed to pretreatment.

Oily wastewater from PCA side is de-emulsified through a strainer to remove macro impurities and sent to oil water separator. Process water is then fed to floc tank prior to treatment by DAF unit. Oily waste is held in used oil container before proper off-site disposal.

Caterpillar Inc. – North Little Rock (NLR)
Caterpillar - AFIN: 60-01529

Overall Facility Process Description/Narrative

A motor grader, commonly referred to as a road grader, a blade, a maintainer or a grader, is an engineering vehicle with a large blade used to create a flat surface. The motor grader manufacturing process consists of the following steps:

- Receipt of pre-fabricated, pre-assembled motors, tires, and other parts/raw materials
- Machining, Fabrication, Heat Treating, Torch Cutting and Welding of motor grader components
- Cleaning and Surface Coating (painting) of fabricated parts
- Assembly of fabricated and purchase finished parts
- Filling and Final testing of motor graders – (Fill, Fire and Test Area; Outside Test Track)
- After Test Assembly (ATA)/Major Repair/Pre-Delivery Inspection (PDI)
- Shipment of finished units – outside storage

Machining, Fabrication, Heat Treating, Torch Cutting and Welding

Caterpillar Inc. – NLR has two fully enclosed PAMA machining centers used to machine various surfaces on circle assemblies. The PAMAs utilized a coolant as a cutting fluid which is applied at the point of cutting. These units are located in the fabrication and welding area.

Also within the fabrication and welding area, the facility has a single plasma torch cutting operation (SN-02K and SN-12B, *same*) that utilizes natural gas as a fuel source to generate heat and oxygen as the cutting gas. The torch is used to cut the teeth into the circle assemblies. The facility also has a heat treating and quenching process to harden the circle assemblies.

There are numerous welding processes (SN-12A) within this area where various motor grader parts are welded together to form large motor grader assemblies and sub-assemblies that will ultimate be used to produce a motor grader. The operation involves a combination of GMAW and FCAW welding process.

Cleaning and Surface Coating (Painting) Operations

The painting operations (SN-01) are the primary source of air emissions at the facility. SN-01 includes:

- Liquid Spray Paint System
- Powder Paint System
- CA (Touch-up) Booth
- Military Booth

Liquid Spray Paint System

Liquid primers and coatings are applied to unfinished parts. This painting system includes a 3 stage-washer, a dry-off station, a masking station, both a liquid primer and topcoat paint booths, a cure oven, a cooling tunnel, and a flash enclosure. Primers and Topcoats are hand sprayed.). Also, a seam sealant will be hand applied (future) onto various part seams as a filler prior to liquid painting.

Powder Paint System

The powder coating application uses charged particles of the coating which are sprayed onto a grounded metal object. This painting system consists of 5-stage washer that utilize alkaline wash and acid pickle stages, an electric infrared cure oven, convection dry-off and cure ovens, cooling tunnels, and powder coating booths. The exhaust air from each booth is re-circulated into the booth after passing though a fabric filter. The two booths are enclosed in an environmentally controlled room (filtered, air conditioned room for humidity and particulate matter control). Also, a seam sealant is hand applied onto various part seams as a filler prior to powder paint.

Touch-Up Booth (CA Booth)

This paint booth is not part of the liquid paint line, and is used to repair paint defects on fully assembled graders. Paint is hand-applied by spraying, brushing, and/or rolling. It is in the area where an epoxy clear coat is applied to the non-painted, exposed hydraulic fittings to protect them from rusting in the field.

Military Booth

This booth will be used to paint fully assembled motor graders for the military. Primers and topcoats are hand-applied by spraying, brushing, and/or rolling.

Natural Gas Sources

Associated with the painting operations are various natural gas sources, SN-02. The natural gas burning equipment consists of burners, dryers, ovens, and blowers. The maximum heat input capacities for the paint lines and the cutting torch are 36.5 MMBtu/hr and 0.2 MMBtu/hr, respectively.

Storage Tanks

There are 6 above ground storage tanks are located at the facility used for storing diesel fuel, various lubricating oils. The one (1) 10,500 gallon diesel storage tank (T106) is designated as SN-03. The two (2) 10,500 gallon hydraulic fluid tanks (T101 and T102), two (2) 10,500 gallon manual transmission fluid tanks (T103 and T107), and one (1) 10,500 gallon coolant (anti-freeze) tank (T105) are considered insignificant activities (A-13). There are also six small storage tanks (T108 – T111, T113 and T114) with less than 1,000 gal capacity.

Assembly/Sub-Assembly/Intro/Main

Caterpillar Inc. – NLR's assembly and sub-assembly area is where various purchase-finished and fabricated components/parts are assembled together onto a moving platform to produce a motor grader. The purchase-finish components and parts include but are not limited to: chassis components, wheel sub-assemblies, transmissions, fuel tanks, engines, cabs, radiators, hydraulic hoses blades, various electrical components, decals, etc.... Various greases, lubricants touchup paints, etc... are utilized in the assembly process (SN-13).

North Dock

This area is used for shipping of various finished parts to the customer. Also in this area, rust preventative is applied by brush or garden sprayer to finished parts to protect them from rusting during shipment.

Fuel, Fire, And Test

The Fill, Fire and Test Area is a compilation of a fuel and lubricant dispensing island followed by fire (startup) and pressure check operational testing stations. The Fill, Fire and Test operation involves filling the motor grader with fuel and other vital fluids for operation, initial startup and cycling of the motor grader to pressurize and check the hydraulic systems for leaks and bleed off air, monitoring and checking of the electrical, cooling fan and other systems, and washing down of the motor grade to remove excess or spilled fluids.

Quality Check Inspection (QCI)

This area is used as a quality gate control that all motor grader pass through after full assembly. Also in this area, rust preventative is applied by brush or garden sprayer to various large parts to prevent them from rusting during shipment.

After Test Assembly (ATA)/Major Repair/Pre-Delivery Inspection (PDI)

In the ATA area, the motor graders subjected to road test (test track), major repair - if necessary, followed by Pre-Delivery Inspections (PDI), and subjected to more operational test if necessary, depending on road test, major repairs, or PDI requirements. Fluids are top back to specified levels and motor graders are washed down as necessary.).

New Product Introduction Area

Caterpillar Inc. NLR's New Product Introduction is an area for implementation of new processes and design of motor grader before it is placed in to the production process. Motor graders are assembled and tested using new process design changes. The area is designed to have all the features of the main and sub assembly lines except on a smaller scale.

Emergency Generators and Fire Pumps

Caterpillar Inc. – NLR has four (4) diesel powered emergency generators located at the facility. One (1) 380 hp Onan generator (SN-06), one (1) 605 hp Onan generator (SN-07) used to provide power to various systems during a power failure and two (2) 10.9 hp Kubota generators (SN-08 and SN-09) used to provide power to each of the facility's emergency storm shelters.

Caterpillar has two diesel fired fire pumps (SN1-10 & SN-11) that were purchased with the building. One is a Clarke fire pump model DDFP-T6FA, with a Detroit Diesel-Allison 248 bhp engine. The second fire pump is a Clarke fire pump model PDFPL6YW, with a Detroit Diesel-Allison 165 bhp engine.

Attachment A-5

NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

Facility Information

Facility Name: Caterpillar Inc.	Site Address: 9201 Faulkner Lake rd.
Phone Number:(s) (501) 955-5240	North Little Rock, AR. 72117
Extensions:	Mailing Address:
Fax Number: (501) 955-5400	(If Different):
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:
Address:	Address:
Telephone No.:	Telephone No.:
Fax No.:	Fax No.:
Contact Person/Title: Katina Stephens, Env. Health & Safety.	Corporate CEO:
Water Works Account Numbers: Water- 936-0054.301 Sprinkler- 936-0055.301 Fire- 988-0071.301	
Principal Product/Service: Manufacture and assembly of motor graders for final delivery.	

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

If Federal Category, list standards and applicable subcategories:

Table of Contents

Comments :

Caterpillar Inc. has been compliant with all aspects of discharge permit.

Industrial Inspector's Name (Print): Mitch Foreman	Signature: Mitch Foreman
Date and Time Inspection Ended: 12-4-14 1410 hrs.	
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 wastewater discharge permit, sewer use ordinance and 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:

- Discussed need to provide more detailed schematic drawings of both paint lines.

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

NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 12-4-14 1300 hrs.			
Name/Title of Representatives Attending Inspection (Include name and title for all IU representatives attending)			
IU Representatives		NLRWWU Representatives	
Katina Stephens, Environmental Health & Safety Mgr.		Mitch Foreman, Senior Industrial Technician	
Jacob Felton, Environmental Health & Safety Tech.			
Signatory Authority (Name & Title) Justin Ganschow, Environmental Health & Safety Supervisor			
SIC Code(s) 3531 Construction Machinery and Equipment. NAICS # 333120			
Days of Operation 5		Days of Production (if different)	
Hours of Operation		Hours of Production (if different)	
Number of Shifts: 2	Shift 1, hrs.: 7am to 3pm	Shift 2, hrs.: 2 to 11	Shift 3, hrs.: to
No. Of Employees: 480	Peak Months	Low Periods	
Are there any scheduled Plant Shutdowns? Yes ☐ No ☑ N/A ☐ If yes when do shutdowns occur? Dec 24-27			
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: 12-5-13 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): 35,000 GPD.			
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	2016080125	31 August 2016
Air	2209-ar-1	Issued 6-7-2010
RCRA		
NPDES (Water)		
Stormwater	AR00 51454	3-21-2015
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.Cleaning & surface coating (paint)	Yes ☑ No ☐	5.	Yes ☐ No ☐
2. PCA (pressure check & adjustment)	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 - Liquid primer and top coatings are applied to unfinished parts. System Includes a multi stage washer, dry off station, masking station, liquid primer and topcoat paint booth, cure oven, Cooling tunnel and a flash enclose. Primers and topcoats are hand sprayed. Treatment includes strainer, oil/water Separator and clarifier. Process #1 also has powder coat line with multi stage wash to include alkaline Wash and acid pickle stage.			
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		☐ 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)			
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
☐	☐	☐	☐
List Raw Materials, Chemicals and Container Volumes used in Process #1			
Steel, cleaners, primer & paint and manufactured components.			
Check Waste Stream Pollutants from Process #1			
☑ BOD	☐ CN^-	☑ Metals (List Metal(s))	☐ Solvents (List Solvent(s))
☑ TSS	☐ Cl_2		
☐ 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:			
Sump pumps throughout production area are plumed to pretreatment facility. See process wastewater flow diagram.			

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

Date: 12.4.14

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NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

IPP-04A
Revised: 1-1-2006

Attachment A: Continued

Provide Brief Description of Process #2 : Pressure check and adjustment (PCA). Compilation of fuel and lubricant Dispensing island followed by startup and pressure check operational testing stations. Operation involves filling Motor grader with fuel & other vital fluids for operation, initial startup & cycling to pressurize & check hydraulic System for leaks, monitor systems and wash down to remove excess or spilled fluids. Treatment consists of strainer, oil/water separator, diffused air floatation and pH control.

Check Pollution Prevention Controls used in Process:

☐ Overflow Alarms	☐ Aqueous Cleaning Solutions
☐ Spray Rinsing, Fog, or Countercurrent Rinsing	☐ Reuse Rinse Waters
☐ Dragout Collection Trays	☐ 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

Check all Sources of Wastewater Generated from Process:

☑ 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

☐ Other (Describe Other)

List Raw Materials, Chemicals and Container Volumes used in Process:

Check Waste Stream Pollutants from Process :

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

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

Is Process Wastewater Discharge? Continuous ☑ Batch ☐

Are there floor drains in the process area? ☑ Yes ☐ No If yes list number and the location of all floor drains:

Sump pumps throughout production area are plumed to treatment facility. See wastewater flow diagram.

Inspectors Name: MITCH FUGEMAN (Print Industrial Inspector's Name Here) **Date:** 12-4-14

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NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

IPP-04B
Revised: 1-1-2006

Attachment B: Pollution Prevention Activities		
Does the facility have a written Pollution Prevention Plan?	Yes ☑	No ☐
Does this facility practice Pollution Prevention?	Yes ☑	No ☐
Check the following Pollution Prevention Activities:		
Good Operating Procedures?	Yes ☑	No ☐
Explain:		
Spill and Leak Prevention Procedures?	Yes ☑	No ☐
Explain: SPCC		
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: onsite Waste Management		
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes ☑	No ☐
Explain: onsite Waste Management		
Recycle Waste Oil, Solvents, and Lubricants?	Yes ☑	No ☐
Explain: onsite Waste Management		
Other Activities		
Explain:		

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

Date: 12.4.14

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NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

IPP-04C
Revised: 1-1-2006

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

Date: 12-4-14
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NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

IPP-04C
Revised: 1-1-2006

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)
Sparling MAG	FM-656	Every 6 mo.	
	M149874410	7-16-14	434160 0 GPM
	M149864410	7-16-14	511930 0 GMP
		Calibrated by; Shupe & associates	

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.

Facility has onsite Waste Management representative to control and remove all generated waste other than treated Processed wastewater.

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.

See above.

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.

See above.

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

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

See above.

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

Date: 12-4-14

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NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

IPP-04D
Revised: 1-1-2006

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. Building SW of facility	☐ Yes ☑ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3.	☐ 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…)

Listed in TOMP and SPCC. Chemicals trucked by hand and used in place.

Inspectors Name: Mitch Foreman (Print Industrial Inspector's Name Here) **Date:** 12·4·14

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NLRWWU INDUSTRIAL PRETREATMENT INSPECTION FORM

IPP-04E
Revised: 1-1-2006

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? 6-29-2011	☐ 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.	
Manholes and connection and monitoring points were found to be in good repair.	

Inspectors Name: MITCH FOREMAN **Date:** 12-4-14
(Print Industrial Inspector's Name Here) **Page** ____ **of** ____

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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 contract lab.

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:

Environmental Services Co. 221-2565

13715 W. Markham Little Rock AR 72211

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 1mo.	☐ 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? 29 JUNE 2011

Is the TOMP being followed as written? ☑ Yes ☐ No ☐ N/A (If no, provide explanation in comments.)

If no, is there evidence that a TOMP is needed? ☐ Yes ☐ No ☑ N/A (If yes, provide description of evidence in comments.)

Comments:

Inspectors Name: Mitch Foreman (Print Industrial Inspector's Name Here) **Date:** 12-4-14

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: 4-29-14
   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	4880gal*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: [signature] Date: 7-25-11