

May 6, 2013

Bad Boy Inc., Randel Davis Paint Supervisor 102 Industrial Drive Batesville, AR 72501

Re: ADEQ Pretreatment Compliance Assurance Visit at Bad Boy Inc. (ARP001027 and ARP001028) discharging to the City of Batesville (AR0020702)

Dear Mr. Davis,

On April 17, 2013 a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel to satisfy the requirements of the memorandum of agreement with EPA Region VI in ADEQ's Pretreatment Program implementation procedures to "randomly sample and analyze the effluent from [Bad Boy] and to conduct surveillance activities in order to identify, independent of information supplied by [Bad Boy] occasional and continuing noncompliance with pretreatment standards" [see 40 CFR 403.8(f)(2)(v)].

While Boy Boy has two separate processes and buildings for the manufacture of two end products (riding lawn mowers and multi-terrain vehicles [MTV]) this office will identify the two facilities as BB #1 (mower division) and BB #2 (MTV division) although their fabrication, laser cutting, assembly and powder coat painting aspects are similar and somewhat intertwined.

You will not find many differences between the two (2) attached CAVs for BB #1 and BB #2.

The site visit observations, sampling analysis and subsequent information gained indicated BB #1 and BB #2 are in compliance with the Federal Metal Finishing pretreatment standards for new sources in 40 CFR 433.17 although the sampling point at BB #2 is deemed inadequate.

### Recommendations

- 1) Reconfigure the 3" PVC outlet pipe from BB #2's phosphatizing line. Because it is "elbowed" downward; its close proximity to the sumps' standing water level precluded grabbing a representative sample of only the wastewater being discharged from the regulated process (see Attachment A-1);
- 2) It would be prudent for Bad Boy to explore the possibility of batch discharging its regulated "work" tanks (#1, #3 and #5) more often than once approximately every six (6) months commingling it with their regulated phosphatizing rinse tanks discharge instead of hauling them off-site for disposal.

Based on the analyticals (see Attachment A-3) from your two (2) facilities' rinse wastewater indicating fairly low concentrations of pollutants Federally limited in the Metal Finishing category 40 CFR 433.17 the addition of the three (3) work tanks' wastewater may not appreciably increase the concentrations in the combined wastestream. The combined wastestream(s) may very well remain compliant with the Federal limitations in 40 CFR 433.17.

With the City's approval Bad Boy could possibly avoid the costs of hauling the "work" tanks contents off-site and blend them with the continual discharge of the regulated rinse wastewater on a more frequent time basis and still remain compliant with the Federal limitations.

This office wishes to extend its sincere appreciation to you and your staff for the transparent exchange of information and dialogue during the visit. Your non-adversarial attitude, willingness to "open the books"; sharing of process knowledge and cooperation compliments the true spirit of environmental partnerships.

Attached you'll find the completed narrative compliance assurance visits' checklists and ADEQ's analysis of the wastewater discharged during the day of this office's visit.

If this office has misrepresented any part of the checklist items please advise as a few items were only cursorily discussed because of the time constraints on the day of the CAV.

Sincerely,

Allen Gilliam

allen Dillian

ADEQ State Pretreatment Coordinator

501.682.0625

Attachments: BB #1 and BB #2 4/17/13 Compliance Assurance Site Visit Forms

BB #2 and BB #1 sampling points' pictures

ADEO's Certificate of Analysis from samples taken at BB #1 and BB #2 on

4/17/13

ec: Eugene Townsley, Batesville Wastewater Manager Mike McDaniel, Batesville Pretreatment Coordinator Craig Uyeda, NPDES Enforcement Branch Manager Rudy Molina, EPA Region 6 Pretreatment Coordinator

Size   Facility   Information	ADEQ Pretreatmen	
Ridding Mowers facility    Signatory Authority: Randel Davis — Paint Shop Supervisor   Phone: 1.870.307.7515   Mailing Address (if different): same   Cell: 870. 612.0350     Fax: 1.870.698.2123   Corporate Owner Name and address: See below   Contact Person: Randel Davis   Phone: 1.870.612.0090     Phone: same   Fax: same   Corporate Owners: Phillip Pulley & Robert Foster     e-mail: Randel.davis@badboymowers.com   poTwis.com.com.com.com.com.com.com.com.com.com		
Signatory Authority: Randel Davis — Paint Shop Supervisor Phone: 1.870.307.7515  Cell: 870.612.0350  Fax: 1.870.698.2123  Corporate Owner Name and address: See below  Contact Person: Randel Davis  Phone: 1.870.612.0090  Phone: same  Fax: same  Comporate Owners: Phillip Pulley & Robert Foster  e-mail: Randel,davis@badboymowers.com  Facility Tracking #ARP001027; AFIN # 3200530  Last Inspection Date: This will be the 1st CAV  POTW (City) IU discharges to: Batesville, AR  POTW's NPDES #AR0020702  Industrial Classification:  Categorical — Metal Finisher  If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17  When did this industry begin discharging to the POTW? 2/01/07  Table of Contents  1. Summary of Inspection  A. Inspection Objectives B. Inspection Meeting A. General Information B. Facility Permits C. Additional Comments  III. Attachments "Yes" indicates item exists at the facility and attachments/discussion will be included  "No" indicates item does not exist at the facility and attachments/discussion aren't necessary  A. Industrial Processes B. Pollution Prevention Activities C. Pretreatment System (No Pretreatment necessary) D. Chemical Storage/handling Le. Spill/Slug Control Plan F. Self-Monitoring/TOMP  Comments:  Inspector's Name (Print):  Signature:  Allen Gilliam  Signature:  Allen Gilliam  Allen Gilliam	1	
Phone: 1.870.307.7515  Cell: 870. 612.0350  Fax: 1.870.698.2123  Corporate Owner Name and address:  See below  Contact Person: Randel Davis  Phone: 1.870.612.0090  Phone: same  Fax: same  Corporate Owners: Phillip Pulley & Robert Foster  e-mail: Randel.davis@badboymowers.com  e-mail: Randel.davis@badboymowers.com  Fax: same  Corporate Owners: Phillip Pulley & Robert Foster  e-mail: Randel.davis@badboymowers.com  Fax: same  Corporate Owners: Phillip Pulley & Robert Foster  e-mail: Randel.davis@badboymowers.com  Fax: same  Corporate Owners: Phillip Pulley & Robert Foster  e-mail: Randel.davis@badboymowers.com  Fax: same  Corporate Owners: Phillip Pulley & Robert Foster  e-mail: Randel.davis@badboymowers.com  Facility Tracking #ARP001027; AFIN # 3200530  Last Inspection Date: This will be the 1st CAV  POTW (City) IU discharges to: Batesville, AR  POTW's NPDES #AR0020702  Industrial Classification: \( \subseteq \text{ CFR 433.17} \)  When did this industry begin discharging to the POTW? 2/01/07  Table of Contents  I. Summary of Inspection  A. Inspection Objectives  B. Inspection Analysis  II. Pre-Inspection Meeting  A. General Information  B. Facility Permits  C. Additional Comments  III. Attachments "Yes" indicates item exists at the facility and attachments/discussion will be included  "No" indicates item does not exist at the facility and attachments/discussion aren't necessary  A. Industrial Processes  B. Pollution Prevention Activities  C. Pretreatment System (No Pretreatment necessary)  pes \( \subseteq \text{ no } \supseteq \text{ Page 5 of 10} \)  D. Chemical Storage/handling  pes \( \subseteq \text{ no } \supseteq \text{ Page 7 of 10} \)  Page 3 of 10  E. Spill/Slug Control Plan  F. Self-Monitoring/TOMP  Comments:  Allen Gilliam		
Cell: 870. 612.0350 Fax: 1.870.698.2123 Address: same Contact Person: Randel Davis Phone: 1.870.612.0090 Phone: same Fax: same Corporate Owner Name and address: See below  Phone: 1.870.612.0090 Phone: same Fax: same Corporate Owners: Phillip Pulley & Robert Foster e-mail: Facility Tracking #ARP001027; AFIN # 3200530 Last Inspection Date: This will be the 1st CAV POTW (City) IU discharges to: Batesville, AR POTW's NPDES #AR0020702 Industrial Classification: Categorical – Metal Finisher Significant If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17 When did this industry begin discharging to the POTW? 2/01/07  Table of Contents  I. Summary of Inspection A. Inspection Objectives B. Inspection Analysis  II. Pre-Inspection Meeting A. General Information B. Facility Permits C. Additional Comments III. Attachments "Yes" indicates item exists at the facility and attachments/discussion will be included "No" indicates item does not exist at the facility and attachments/discussion aren't necessary A. Industrial Processes B. Pollution Prevention Activities C. Pretreatment System (No Pretreatment necessary) D. Chemical Storage/handling E. Spill/Slug Control Plan F. Self-Monitoring/TOMP  Comments:  Inspector's Name (Print):  Allen Gilliam  Corporate Owner Name and address: See below  Corporate Owner Same  Corporate Owner Name and address: See below  Corporate Owner Same  Page 12.0000  Corporate Owner Same  Page 2 of 12.000  Corporate Owner Same  Page 3 of 10  Page 3 of 10  Page 3 of 10  Page 3 of 10  Page 9 of 10  Page 9 of 10  Page 10 of 10  Comments:  Signature:  Allen Gilliam	Signatory Authority: Randel Davis - Paint Shop Supervis	or T
Corporate Owner Name and address:   Address: same	Phone: 1.870.307.7515	Mailing Address (if different): same
Address: same Contact Person: Randel Davis Phone: 1.870.612.0090 Phone: same Fax: same Corporate Owners: Phillip Pulley & Robert Foster e-mail: Randel.davis@badboymowers.com e-mail: Facility Tracking #ARP001027; AFIN # 3200530 Last Inspection Date: This will be the 1st CAV POTW (City) IU discharges to: Batesville, AR POTW's NPDES #AR0020702 Industrial Classification: Categorical – Metal Finisher Significant If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17 When did this industry begin discharging to the POTW'2 2/01/07  Table of Contents  I. Summary of Inspection A. Inspection Objectives B. Inspection Analysis  II. Pre-Inspection Meeting A. General Information B. Facility Permits C. Additional Comments C. Additional Comments  III. Attachments "Yes" indicates item exists at the facility and attachments/discussion will be included  "No" indicates item does not exist at the facility and attachments/discussion aren't necessary A. Industrial Processes B. Pollution Prevention Activities yes on Page 5 of 10 yes on Page 6 of 10 C. Pretreatment System (No Pretreatment necessary) yes no Page 7 of 10 D. Chemical Storage/handling F. Self-Monitoring/TOMP Comments:  Inspector's Name (Print): Allen Gilliam  See blow  Phone: 1.870.612.0090  Phone: 1.870.61	Cell: 870. 612.0350	
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Date and Time Inspection Ended: 4/17/13 @ 12,45 p.m	Date and Time Inspection Ended: 4/17/13 @ i2,45?	m

	I. Summary o		Andreas American Company of the Comp		
A. Inspection and Objective (Complete Before Inspection)					
Permit Renewal	⊠ Bi-Annual	Spill/Slug		Unscheduled	
☐ New Construction	Noncompliance	☐ Follow-up	)	Complaint	
Inspection Objective(s): Compliance assurance visit with sampling to implement the Federal Pretreatment Regulations in 40 CFR 403.8(f)(2)(v) and more specifically to verify compliance with the Federal Metal Finishing Pretreatment limitations in 40 CFR 433.17 (Pretreatment Standards for New Sources – PSNS).					
Checklist of items to be reviewed	and/or visually inspected:				
☐ Pre-inspection Meeting	Permit Conditions (		Safety Concerns		
□ Process Inspection	Pretreatment System			submitted as yet)	
Chemical Storage	Discharge point(s)		Spills/Slug Contr		
Records Review	RCRA information			etreatment Schematics	
☑ IU sampling procedures	Flow/pH Meter(s)		Calibration Reco		
MSDS Inventory List	New MSDS		P2, BMPs, EMS,		
Comments: Some chems' MSDS allow for a full review of the facil		d 6/26/12) subr	mitted to ADEQ.	. Time constraints did not	
	B. Inspectio	n Analysis			
Were there any deficiencies/violate	tions identified and noted	during the insp	ection?  Yes	⊠ No	
Provide a brief narrative of deficient	encies/violations or other of	concerns in the	following areas:		
Records Review: Adequate, no co	omment.				
Process Area(s): Adequate, no con	mment.				
Pretreatment System: N/A					
Self-Monitoring Procedures: For to procedures are adequate.	this type of regulated proce	ess wastewater	(homogeneous)	the grab sampling	
Accidental discharge/Slug Contro	l Plan: Slug discharge pote	ential deemed r	negligible.		
Sampling Point: Adequate for this type of process, but leaning over on one hand and knees to reach out and grab samples at ground level should be rectified to include an extension pole (non-metallic) with a gimbaled end to hold the sample bottle(s). (See Attachment A-2)					
Chemical Storage: Adequate, no o	comment.				

II. Pre-Inspec	tion Meeting
A. General I	nformation
Date and Time Inspection Started: 4/17/13 @ 9:15 a.m.	SIC/NAICs code(s): 3524 / 33635
IU Reps/Titles: Randel Davis / Paint Supervisor	ADEQ Reps/Titles:
Wes Bramlett, FTN Associates, consultant professional engineer to Bad Boy Inc.	Allen Gilliam/State Pretreatment Coordinator
	City Reps/Titles: Eugene Townsley, City Wastewater Superintendent
	Mike McDaniel, City Pretreatment Coordinator
End product(s): Riding lawn mowers	Approx. # of units produced/yr: ~ 230 riding lawn mowers and Multi-Terrain Vehicles
Days of Operation: Monday through Friday	Days of Production (if different): same
Hours of Operation: 16	Hours of Production (if different): same
"Staggered" hr. Shifts #1 & #2: 4:30 a.m. to 10:00 p.m.	Shift3 hrs: N/A
Total Bad Boy # of Employees: 375   Peak Months: Nov	rember thru June "Off" Months: July thru October
Are there any scheduled plant shutdowns? Yes \( \subseteq \text{No } \text{No } \ext{N}	N/A If yes, when?
Are there designated plant clean-up days? Yes \( \subseteq \text{No } \text{No } \text{N}	I/A If yes, when?
Is the facility currently in compliance with all pretreatn	nent reporting requirements and limits? Yes 🛛 No 🔲
If No, explain:	
Are there any Special Entry Procedures for the Discharge/S	ample point locations? Yes No 🗌
If Yes, explain: An authorized rep would have to check in a them to the sampling point and tour of facility operations.	as a visitor and have an authorized company rep escort
Are there any Safety Concerns or Identified Hazards that the	e inspector should be aware of: Yes No
If Yes, explain: Safety glasses required.	
Has there been any changes since the last inspection reg compliance assurance visit.	arding the following items: N/A since this the first
Plant/flow/process layout? Yes No If yes, obtain	copy of updated schematic for facility file.
Processes? Yes No If yes, explain:	
Production Levels? Yes No If yes, explain:	
Raw materials? Yes No If yes, explain:	
Flow rates? Yes No If yes, explain	
Are regulated and non-regulated wastestreams combined?	yes 🔲 no 🛛
Prior to Pretreatment System?	yes no N/A
If Yes, was the CWF used to calculate limits?	yes □ no □ N/A ⊠
Prior to connection to the POTW sanitary sewer?	yes no N/A

	B. Facility Permits	
ADEQ Permit Type	Permit No.	Expiration Date
retreatment Tracking #	ARP001027	N/A
ST Facility #	32001679	7/31/13
	C. Additional Comments	
Note which section or attachmen		
	s(es): It will be recommended to blend thei uled off-site ~ twice/yr) with the continual r	
	thy the two (2) wastestreams cannot be discled CFR 433.17 are met. This would negate or disposal	
work talks wastewater off-site ic	n disposai.	

		Attachmen	t A: Indust	rial F	rocess(es)		71 m 1 m	
List process(es) generating wastewater. Note whether it is subject to Federal Pretreatment Standards								
1. Conversion coating:	: Phosphatizir	ng	Yes 🛛 No [		3.		Yes [	No 🗌
2. Ancillary operations	s (acid descal	e bath and rinses)	Yes 🛛 No [		4.		Yes [	] No □
Were processes visual	Were processes visually inspected? Yes No							
Brief description of process(es): Welding, laser cutting and some final shaping is made to raw material brought in. Most raw material is preformed cold rolled steel which is further processed through a typical five stage phosphatizing operation prior to powder coating. The 1 <sup>st</sup> stage is a heated acidic descaler spray followed by a fresh water rinse. The 3 <sup>rd</sup> stage is the heated phosphatizing stage which captures them under the core operation of conversion coating in 40 CFR 433.17. It's followed by another fresh water rinse. The final (5 <sup>th</sup> ) stage is a corrosion preventative spray. Parts are sent through a dry off oven then to the powder coat room. After powder coating, the workpieces are sent through a "bake oven" for final curing of paint. In a separate room, workpieces are final assembled into a complete riding mower, filled with hydraulic, gear and engine oil and fuel ready for shipment. Counter current flows are utilized for make-up water from the 2nd and 4th fresh water rinse stages back to stages 1 and 3 respectively.								
The two (2) facilities'					pray booths are the sa	ame (wi	th the sa	ame chemicals)
except the Multi-Terra	iin venicie ia	citity's tanks hold a	nttle more vo	nume.				
General observations of	of facility's in	door housekeeping	Clean and or	derly.				
		T S						
General observations of	of area outside	e facility's building	Uncluttered	with n	o evidence of an illeg	gal direc	t discha	rge.
Check all sources of w estimated. If batch dis						g. gal/da	y, meas	ured or
□ Process Rinse Over     ∼7,770 gpd		Equip. Cleanuj			Floor Cleanup			Solutions te for disposal
Product Cleaning		Forklifts Main	t./Wash		Tank Dragout Too ll to measure	_		on Devices
Boiler Blowdown		Spent Rinse Ta	nks		Equipment blants	☐ No	n-Conta	act Cooling Water
List Major Raw Materials and Chemicals used/on-site: Preformed cold rolled steel, sulfuric/phosphoric acid (descale/acid cleaner stage #1); nitric/hydrofluoric/phosphoric acid (Eco-Treat stage #3); corrosion preventative – unspecified chems on MSDS (Cor Rinse stage #5); hydraulic, engine and gear oils and fuel blends.								
Check Waste Stream Pollutants of Concern from Process(es)								
<ul> <li>✓ CN</li> <li>✓ Metals: All from 40 CFR 433.17</li> <li>✓ Solvents: All toxic organics listed in 40 CFR 433.11 (no Toxic Organic Management Plan submitted as yet)</li> </ul>								
⊠ pH								
Are there floor drains i	in the Process	area? Yes	☑ No If yes l	ist nur	nber and the location	of all fl	oor drai	ins:

Attachment B: Pollution Preven	tion (P2) / Recycling Activities
Does the facility have a written P2 Plan? Yes No	Not a written "Plan".
Does this facility practice P2? Yes 🛛 No 🗌	
Environmental Management System in place? Yes No	
ISO 140001 Certified? Yes No 🗵	Although they're "European certified"
Written Standard Operating Procedures? Yes No	
Explain: Step-by-step procedures in a 3 – ring notebook for the ph	osphatizing line.
Preventative Maintenance Program Yes No	(hydraulic systems, valves, pumps, etc)
Explain: On as needed basis especially during slow production per	riods.
Water Reuse: Yes No	
Explain: Counter-current flows from rinses back to baths for make description.	e-up water in previous acid baths. See above process
Cost Accounting to Track Savings: Yes No 🗌	
Explain: They conduct forecast planning.	
Inventory Control / "Green Purchasing": Yes No	(lean manufacturing/"green purchasing", etc)
Explain: They conduct forecast planning.	
Employee Training: Yes No	
Explain: For each station, there is employee training on proper p	rocedures.
C. (C.) (D.) (C.)	N/4 N/
Spent Solvent Reclamation? Yes No	N/A 🔀
Explain:	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes No	
Explain: Scrap metal too.	
Explain. Scrap metal too.	
Recycle Waste Oil, Solvents, and Lubricants? Yes No	
Explain: They re-use waste oil from the MTV and mower service	shop(s) for heating during the winter
Explain. They to use waste on from the 1411 v and mower service	shop(s) for neutring during the winter.
Other Activities:	
P2 Equipment/Practices in use:	
Overflow Alarms (in sump)	Aqueous Cleaning Solutions
☐ Fog Spray Rinsing	☐ Countercurrent Rinsing
☐ Dragout Collection Trays	Seal-Less Pumps
☐ Air Curtain to retain heat in dry-off and curing ovens	Secondary Containment of Process Solutions
Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☐ Recycled de-I cooling water for laser cutting	Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☐ Conductivity Meters
☐ Dead Rinse Tanks	Bath / Rinse Filtration (in-situ)

Attachment	C: Pretreatment System (Pretreatm	ent not necessary to	meet Mei	tal Finishing lim	itations)		
Are wastestreams s	egregated before pretreatment?	Yes	☐ No	⊠ N/A			
Are they pretreated	prior to discharge to the sanitary sewer?	Yes	☐ No	N/A			
Was the pretreatme	ent system visually inspected during this vi	sit? Yes	☐ No	⊠ N/A			
			-				
Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:							
pH Adjustment	☐ Sand Trap	Sediment	tation	☐ Silver R	ecovery		
Provide Brief Desc	ription of Pretreatment System (leaks, clea	nliness, equipment not	in working	order): No pretre	atment is		
necessary to meet	the Metal Finishing limitations in 40 CI	FR 433.17.					
Does the description	n match the schematic currently on file?	□Yes	□No	⊠N/A			
System Operator N	ame(s):						
Does discharge per	mit require licensed operator?	Yes	☐ No	⊠ N/A			
Is the System Opera	ator(s) licensed by the State of Arkansas?	☐ Yes	☐ No	⊠ N/A	·		
List Name(s) and L	icense classification:						
Is training provided	I to the Pretreatment System Operator(s)?	Yes No	⊠ N/A				
If Yes, list typ	be and frequency: Not discussed.						
Is the discharge from	m the Process	us Combination					
	ges are batch type or combination, describ						
<u> </u>	ge: ~7,770 gallons per day. Only rinse tanl		ly discharg	ed. Stages 1 (de-s	caler: 1,500		
gallons), 3 (phospha	atizing; 900 gallons) and 5 (corrosion inhi						
pumped for off-site	disposal ~ twice/yr.						
Describe process from	om which batch originated (spent bath, e.g	;.): N/A					
Approximate duration of batch discharge:							
Meter Type	Calibration Procedure and Frequency	Comments (Totalizer					
With approval from	n and witnessed by the City reps, the facilit	y used a 5 gallon bucke	t and stop	watch to estimate of	daily flows.		
1							

Attachme	nt D: Ch	emical Sto	orage Area(s)		
Does the facility have a designated chemical storage area(s)? Yes			□No		
Was this area(s) visually inspected?		⊠Yes	□No □N/A		
(distant assembly room not extensively inspected, o	nly proces	s wastewate			
Describe Chemical Storage Area(s)	Are there drains in	floor this area?	If yes, where does this drain lead to?		
A barrel per each work tank of the     phosphatizing line was sitting on a drum pallet	□Yes	⊠No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer		
2. Very little overstock of phosphatizing line stored in a shelved/protected area.	□Yes	⊠No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer		
3. Fuel and various oils are kept in a separate building where final assembly and service is conducted.	□Yes	⊠No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer		
4. A small amount of chain/conveyor lube oil is pumped from a small rectangular container to the above spray nozzles on conveyor line ~ every 4 hrs. Any drippage at that point is simply caught on an oil-sorb mat.	□Yes	⊠No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer		
Does the Chemical Storage Area(s) contain any of t	he followi	ng?			
Dikes, Berms for Containment	Plug	s for Floor	Drains		
Secondary Tanks for Holding	Pren	nix (low) Co	oncentrations		
Alarms	Chai	n restraints	, limited access		
Spills Control Kits for Cleanup	☐ Noti	fication Pro	cedures		
Chemical desegregation within Storage Area	Othe	er			
Chemical Inventory List (MSDS) on file?		⊠Yes	□No □N/A		
Time constraints did not allow for a comprehensive	review of	the facility'	s entire MSDS book.		
Were any new MSDS reviewed during the Inspection	n?	Yes	□No ⊠N/A		
Chemical storage comments: Adequate, no commen	nt.				
Chemical handling procedures (totes, dolly, buckets, hardline, etc): They use rolling pallet "jacks" to transfer barrels from the loading dock to the main storage area; then to the individual stations.					
Hazardous waste chemical handling procedures (pro	perly seal	ed container	rs, labeled, manifests, etc): N/A		

Attachment E. Accidental discharge/Slug Control Plan	
Does the facility have an accidental discharge/Slug control plan? Slug discharge potential deemed negligible.	☐ yes         no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	☐ yes ☐ no ☒ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☐ yes ☐ no ☒ N/A
(B) Describes storage and handling of 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/hazardous 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 Spill/Slug Notification Procedures posted?	☐ yes ☐ no ☐ N/A
Are they posted in areas where chemicals are used and stored?	☐ yes ☐ no ☒ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	yes no N/A
This is part of their "apprenticeship" program.	
Has there been any non-routine, episodic chemical spills discharged to the City in the past year?	☐ yes ☐ no
(Briefly Describe, Include Dates) N/A	4
Was the City notified of these occurrences? ☐ yes ☐ no ☒ N/A	
Visual Inspection of Discharge Lines/Points	de franchische Same Leiter für der für
Sampling / Monitoring Point: Relatively clean; 3" PVC pipe slightly extending into an in-ground (~ 4' deep) sump which is between stages 4 and 5 of phosphatizing line.	diameter fiberglass X 6'
Total Flow Monitoring Point: 5 gallon bucket test with stop watch.	
Upstream Manhole: N/A	
Point of Connection: Sump pump from above sampling point "kicks-in" when sump level reaches a certain the sump to the City at fairly frequent intervals.	ain volume which drains

Attachment F	: Self-Monitoring & if CFR 43	3, TT	O/TOMP Requirements		
Have Operator (or person collecting t descriptions. Include name of individual	the sample) to describe how composi ual and title. This inspector had to ge if one lost their balance and fell into	ite and get on on	grab samples are collected and preserved. Record ne hand and knees holding sample bottle under 'deep sump. A non-metallic extension pole		
VVII is the second maint leasted 0					
Where is the sample point located?	□ p		. 170		
End of Process	Pretreatment Effluent		otal Flow		
Combined Flow	Metered Flow		ow Actuator		
Private Manhole	Utility Manhole	A	dvance Notice Required		
Is the Sample Collection Site Adequa			☐ Yes ☐ No ☐ N/A		
Does the facility rep. request a split		n?	☐ Yes ⊠ No		
Does the facility perform self-monitor	· · · · · · · · · · · · · · · · · · ·	·	Yes No N/A		
If no, record the name and addre American Interplex (Toxic Organics),		ig Labs	(Metals), 3301Langley Dr., Searcy, AR;		
Automatic Sampler  or Manual					
IU Self-Monitoring Results reviewed: semi-annual reports)	(from initial 6/26/12 BMR and two	(2)	⊠ 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?					
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)					
EPA recommended holding time	es being met (Refer to 40CFR Part 13	36)	⊠ Yes □ No □ N/A		
Chain of Custody Records for Se	elf-Monitoring Samples Reviewed		☐ Yes ☐ No ☐ N/A incomplete		
Were correct Sample Types Coll	lected		Yes No N/A unknown		
Dates and times of Sample Colle	ection Recorded?		⊠ Yes □ No □ N/A		
Were Samples preserved correct	ly (refer to 40CFR Part 136)		⊠ Yes □ No □ N/A		
Were Self Monitoring records or	n file for past 3 years?		☐ Yes ☐ No ☑ N/A Facility just began semi-annual reporting		
Toxic Organic Management Plan (1	ГОМР) for Metal Finishers under	CFR 4	33		
How does the IU comply with the TTG	O requirements? Analysis	Certific	eation 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 t	to the TOMP: N/A				
Is the TOMP being followed as written?					
If no, is there evidence that a TOMP is needed? Yes No No N/A (If yes, provide description of evidence in comments.)					
Comments: Initial TTO scans submitte toxic organics.	ed with their 6/26/12 BMR; 1/9/13 a	nd 6/13	periodic reports indicated non-detects for all		

ADEQ Pretreatmen	nt Industrial Inspection				
Facility	Information				
Facility Name: Bad Boy Inc. #2	Site Address: #1 Bad Boy Blvd.				
(Multi-Terrain Vehicles facility)	Batesville, AR 72501				
Signatory Authority: Randel Davis - Paint Shop Supervis	sor				
Phone: 1.870.307.7515	Mailing Address (if different): 102 Industrial Blvd. Batesville, AR 72501				
Call, 970 612 0250	Batesville, AR 72301				
Cell: 870.612.0350 Fax: 1.870.698.2123	Corporate Owner Name and address:				
	See below				
Address: same	_ See below				
Contact Person: Randel Davis	DI 1 070 (10 0000				
The state of the s	Phone: 1.870.612.0090				
Phone: same	Fax: same				
Fax: same	Corporate Owners: Phillip Pulley & Robert Foster				
e-mail: Randel.davis@badboymowers.com	e-mail:				
Facility Tracking #ARP001028; AFIN # unknown	Last Inspection Date: This will be the 1st CAV				
POTW (City) IU discharges to: Batesville, AR	POTW's NPDES #AR0020702				
Industrial Classification:	r Significant				
If Categorical, list which CFR #(s) the facility is subject	to: 40 CFR 433.17				
When did this industry begin discharging to the POTW?					
	of Contents				
I. Summary of Inspection	Page 2 of 10				
A. Inspection Objectives B. Inspection Analysis					
B. Inspection Analysis					
II. Pre-Inspection Meeting	Pages 3 & 4 of 10				
A. General Information					
B. Facility Permits					
C. Additional Comments  III. Attachments "Yes" indicates item exists at the fa	acility and attachments/discussion will be included				
	at the facility and attachments/discussion aren't necessary				
A. Industrial Processes	yes \( \subseteq \text{ no } \subseteq \text{ Page 5 of 10}				
B. Pollution Prevention Activities	yes ⊠ no ☐ Page 6 of 10				
C. Pretreatment System (No Pretreatment necessary)					
D. Chemical Storage/handling	yes \( \sum \) no \( \sum \) Page 8 of 10				
E. Spill/Slug Control Plan	yes \( \sum \text{no} \sum \text{Page 9 of 10} \)				
F. Self-Monitoring/TOMP Comments:	yes 🛛 no 🗌 Page 10 of 10				
Comments .					
Inspector's Name (Print):  Allen Gilliam	Signature:				
IU Rep's Name (Print):	Signature!				
Date and Time Inspection Ended: 4/17/13 @ /2; 45					
Date and Time hispection blued, 4/17/13 (a) 72, 73	, b'al'				

	I. Summary	of Inspec	ction is a first to the		AND THE PROPERTY OF	
A. Inspection and Objective (Complete Before Inspection)						
Permit Renewal		☐ Spil	/Slug		Unscheduled	
☐ New Construction	☐ Noncompliance	☐ Foll	ow-up		Complaint	
Inspection Objective(s): Compliance assurance visit with sampling to implement the Federal Pretreatment Regulations in 40 CFR 403.8(f)(2)(v) and more specifically to verify compliance with the Federal Metal Finishing Pretreatment limitations in 40 CFR 433.17 (Pretreatment Standards for New Sources – PSNS).						
Checklist of items to be reviewed	and/or visually inspected	ŀ				
□ Pre-inspection Meeting	Permit Conditions		Safety Concerns			
Process Inspection	Pretreatment Syste		TOMP (one not		mitted as yet)	
☐ Chemical Storage	Discharge point(s)		Spills/Slug Cont	rol ]	Plan	
Records Review	RCRA information		Process/Flow/Pr			
	Flow/pH Meter(s)		☐ Calibration Reco	ords		
MSDS Inventory List	New MSDS		P2, BMPs, EMS	, etc	c	
Comments: Some chems' MSDS allow for a full review of the facil				. T	ime constraints did not	
Were there any deficiencies/violat					No	
Provide a brief narrative of deficie					110	
Records Review: Adequate, no co		CONCURS	ar are rone was a cas			
Records Review. Adequate, no co	minent.					
Process Area(s): Adequate, no con	nmant					
Process Area(s). Adequate, no con	innent.				<u> </u>	
Pretreatment System: N/A						
Self-Monitoring Procedures: For this type of regulated process wastewater (homogeneous) the grab sampling procedures are adequate.						
Accidental discharge/Slug Contro	Plan: Slug discharge po	tential dee	med negligible.			
Sampling Point: Sampling point was deemed inadequate. The sampling port (3" PVC pipe "elbowed" down) is very near the sump's stagnant fluid level. Sample bottles can only be submerged into the mix of stagnant sump water and process wastewater as it is discharged. This may or may not be a problem with meeting limits, but any TSS build-up in the sump would skew the process wastewater results. (See attached picture A-1)						
Chemical Storage: Adequate, no comment.						

L. William Viller 25 Albert L. L. L.	II. Pre-Inspec	tion Meeting	
A COMPANY OF THE PARTY OF	A. General I	nformation	的神经理学者,我们不会探讨。这
Date and Time Inspection Started: 4/17	7/13 @ 8:00 a.m.	SIC/NAICs code	(s): 3524 / 333112
IU Reps/Titles: Randel Davis / Paint St	upervisor	ADEQ Reps/Title	es:
Wes Bramlett, FTN Associates, consul engineer to Bad Boy Inc.	tant professional	Allen Gilliam/Sta	te Pretreatment Coordinator
		City Reps/Titles: Superintendent	Eugene Townsley, City Wastewater
		Mike McDaniel,	City Pretreatment Coordinator
End product(s): Multi-Terrain Vehicles	3		s produced/yr: ~ 230 riding lawn i-Terrain Vehicles
Days of Operation: Monday through Fr	iday	Days of Production	on (if different): same
Hours of Operation: 8		Hours of Product	ion (if different): same
Shift 1, hrs: 7:30 a.m. to 1:30 p.m.	Shift 2, hrs: N/A.		Shift 3, hrs: N/A.
Total Bad Boy # of Employees: 375	Peak Months: not	mentioned	"Off" Months:
Are there any scheduled plant shutdown	ns? Yes 🗌 No 🔯 N	I/A If yes, when	n?
Are there designated plant clean-up day	/s? Yes 🗌 No 🔯 N	/A If yes, when	n?
Is the facility currently in compliance	e with all pretreatn	nent reporting req	uirements and limits? Yes 🛛 No 🗌
If No, explain:	· 大学		
Are there any Special Entry Procedures	for the Discharge/S	ample point location	ons? Yes 🛛 No 🗌
If Yes, explain: An authorized rep wou them to the sampling point and tour of		s a visitor and have	an authorized company rep escort
Are there any Safety Concerns or Ident	ified Hazards that th	e inspector should l	be aware of: Yes 🛛 No 🗌
If Yes, explain: Safety glasses required	•		
Has there been any changes since the compliance assurance visit.	last inspection reg	arding the followi	ng items: N/A since this the first
Plant/flow/process layout? Yes N	lo If yes, obtain	copy of updated scl	hematic for facility file.
Processes? Yes No If yes, exp	olain:		(100 kg 1 k
	(1) (1) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2		
Production Levels? Yes No If	yes, explain:		
Raw materials? Yes No If ye	es, explain:		
Flow rates? Yes No If yes, exp	olain		
Are regulated and non-regulated wastes	treams combined?	yes no	
Prior to Pretreatment System?		yes no	N/A ⊠
If Yes, was the CWF used to calcu	ulate limits?	yes no	□ N/A ⊠
Prior to connection to the POTW san	nitary sewer?	yes no	□ N/A ⊠

· · · · · · · · · · · · · · · · · · ·	B. Facility Permits	
ADEQ Permit Type	Permit No.	Expiration Date
Pretreatment Tracking #	ARP001028	N/A
	C. Additional Comments	La Line of Average 1995
(Note which section or attachment	comments are regarding) (es): It will be recommended to blend the	
process of phosphatizing.  This inspector can see no reason why the Metal Finishing limitations in 40  'work" tanks wastewater off-site for	y the two (2) wastestreams cannot be dis CFR 433.17 are met. This would negat disposal.	charged together to the City as long as e their current practice of hauling the
10-20-00		

<b>大型工作的</b>	<b>有性性性的</b>	Attachmen	rt A: Inc	dustri	al Process(es)	14.4	an Park to the	
List process(es) gener	ating wastewa	iter. Note whether	it is subje	ect to F	ederal Pretreatment Stand	dards		
1. Conversion coating	: Phosphatizir	ng	Yes 🖂	No 🗌	3.		Yes No	
2. Ancillary operation	s (acid descal	e bath and rinses)	Yes 🖂	No 🗌	4.		Yes No	
Were processes visual	lly inspected?	Yes 🛛 No 🗌						
Brief description of process(es): Welding and some final shaping is made to raw material brought in. Most raw material is preformed cold rolled steel which is further processed through a typical five stage spray booth phosphatizing operation prior to powder coating. The 1 <sup>st</sup> stage is a heated acidic descaler spray followed by a fresh water rinse. The 3 <sup>rd</sup> stage is the heated phosphatizing stage which captures them under the core operation of conversion coating in 40 CFR 433.17. It's followed by another fresh water rinse. The final (5 <sup>th</sup> ) stage is a corrosion preventative spray. Parts are sent through a dry off oven then to the powder coat room. After powder coating, the workpieces are sent through a "bake oven" for final curing of paint. In a separate room, workpieces are final assembled into a complete multi-terrain vehicle, filled with hydraulic, gear and engine oil and fuel ready for shipment. Counter current flows are utilized for make-up water from the 2 <sup>nd</sup> and 4 <sup>th</sup> fresh water rinse stages back to stages 1 and 3 respectively.								
The two (2) facilities' except the Multi-Terra	- · ·				ive spray booths are the s	same (wi	ith the same c	hemicals)
except the Multi-Terra	ani venicie ia	cinty's talks floid a	ittle mo	ie voit	mic.			
General observations	of facility's in	door housekeeping	: Clean ar	nd orde	erly.			
General observations	of area outsid	e facility's building	: Unclutte	ered w	th no evidence of an ille	gal direc	t discharge.	
Check all sources of we estimated. If batch dis					ction system. Indicate avonth, e.g.).	g. gal/da	ay, measured	or
Process Rinse Ove	erflows	Equip. Cleanu	p		Floor Cleanup		ent Bath Solued off-site for	
Product Cleaning		Forklifts Main	t./Wash		☐ Tank Dragout Too small to measure		r Pollution De	
Boiler Blowdown		Spent Rinse Ta	anks		☐ Equipment Coolants	□ No	on-Contact Co	oling Water
List Major Raw Materials and Chemicals used/on-site: Preformed cold rolled steel, sulfuric/phosphoric acid (descale/acid cleaner stage #1); nitric/hydrofluoric/phosphoric acid (Eco-Treat stage #3); corrosion preventative – unspecified chems on MSDS (Cor Rinse stage #5); hydraulic, engine and gear oils and fuel blends.								
Check Waste Stream I	Pollutants of (	Concern from Proce	ss(es)					
⊠ CN	Metals: A	all from 40 CFR 43			vents: All toxic organics larganic Management Plan			11 (no
⊠ pH								
Are there floor drains	in the Process	s area? Yes	⊠ No If	yes lis	t number and the location	of all f	loor drains:	

Attachment B: Pollution Prevention (P2) / Recycling Activities					
Does the facility have a written P2 Plan? Yes	s 🗍 💮 1	No ☑ Not a written "Plan".			
Does this facility practice P2? Yes		No 🗌			
Environmental Management System in place?	Yes 🔲 🔝	No 🖂			
ISO 140001 Certified? Yes	i 🗌 1	No Although they're "European certified".			
Written Standard Operating Procedures? Yes		No 🗌			
Explain: Step-by-step procedures in a 3 – ring	notebook for	r the phosphatizing line.			
Preventative Maintenance Program Yes		No ☑ (hydraulic systems, valves, pumps, etc)			
Explain: On as needed basis especially during	slow product	ction periods.			
Water Reuse: Yes		No 🗌			
Explain: Counter-current flows from rinses bac description.	k to baths for	or make-up water in previous acid baths. See above process			
Cost Accounting to Track Savings: Yes		No 🗌			
Explain: They conduct forecast planning.					
Inventory Control / "Green Purchasing": Yes		No [ (lean manufacturing/"green purchasing", etc)			
Explain: They conduct forecast planning.					
Employee Training: Yes	1	No 🗌			
Explain: For each station, there is employee tra	aining on pro	oper procedures.			
Spent Solvent Reclamation? Yes	1	No N/A			
Explain:					
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes 🛚	No 🗌			
Explain: Scrap metal too.					
Recycle Waste Oil, Solvents, and Lubricants?		No			
Explain: They re-use waste oil from the MTV	and mower se	service shop(s) for heating during the winter.			
Other Activities:					
P2 Equipment/Practices in use:					
Overflow Alarms (in sump)		Aqueous Cleaning Solutions			
Fog Spray Rinsing		Countercurrent Rinsing			
Dragout Collection Trays		Seal-Less Pumps			
Air Curtain to retain heat in dry-off and cur	ing ovens	Secondary Containment of Process Solutions			
Aqueous Paint Stripping Solutions		Bead Blasting to Remove Paint			
Recycled de-I cooling water for laser cutting		Recycle Overspray			
In-Process Recycle (Ion Exchange, Reverse	Osmosis)	☐ Conductivity Meters			
Dead Rinse Tanks		☐ Bath / Rinse Filtration (in-situ)			

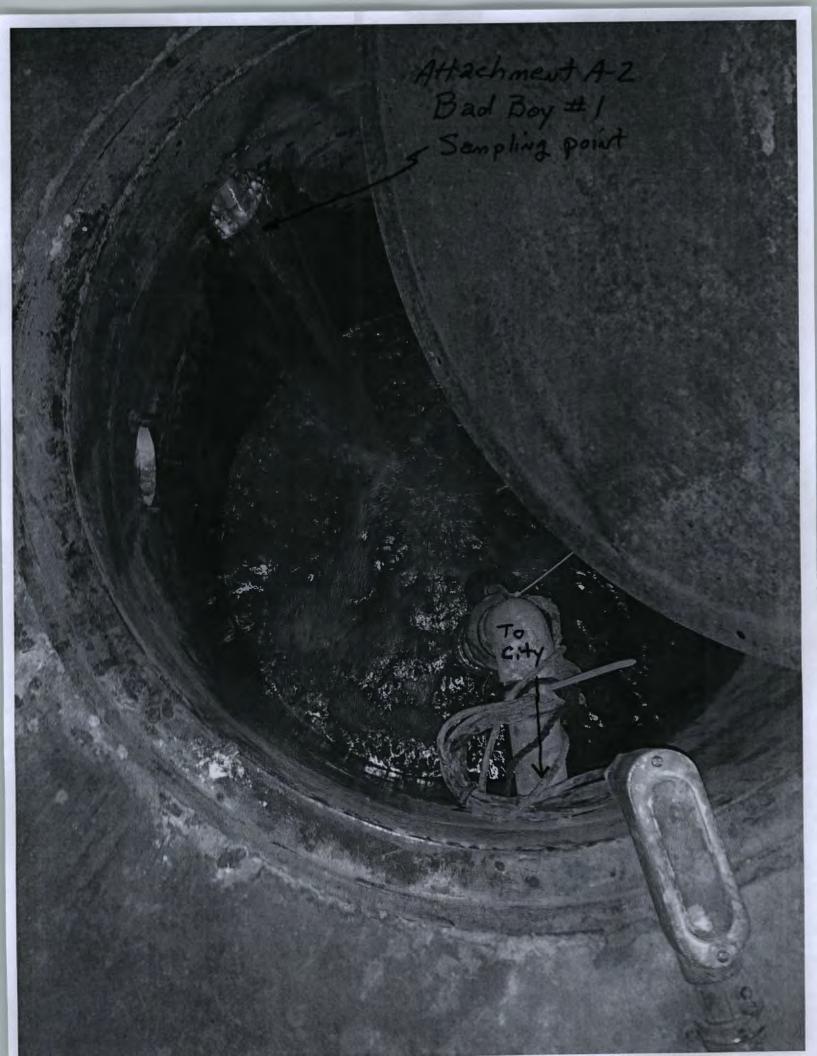
Attachment C: P	retreatment System (Pretreatme	nt not necessary to	meet Met	al Finishing limitations)			
Are wastestreams segrega	ated before pretreatment?	☐ Yes	☐ No	⊠ N/A			
Are they pretreated prior	to discharge to the sanitary sewer?	Yes	☐ No	N/A			
Was the pretreatment system visually inspected during this visit? Yes No N/A							
Check which of the follow	wing are utilized for pretreatment prior	r to discharge to sanita	ry sewer:				
pH Adjustment	☐ Sand Trap	☐ Sedimenta	ation	Silver Recovery			
Provide Brief Description	of Pretreatment System (leaks, clean	liness, equipment not i	n working	order): No pretreatment is			
necessary to meet the M	etal Finishing limitations in 40 CFF	R 433.17.		7-11-1			
Does the description mate	ch the schematic currently on file?	□Yes	□No	⊠N/A			
System Operator Name(s	):						
Does discharge permit re-	quire licensed operator?	☐ Yes	□No	⊠ N/A			
Is the System Operator(s)	licensed by the State of Arkansas?	☐ 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: Not discussed.						
Is the discharge from the	Process Batch Continuous	Combination					
If any discharges are	e batch type or combination, describe	the following: N/A					
Volume of discharge: ~5,	040 gallons per day. Only rinse tanks	2 and 4 are continuall	y discharge	ed. Stages 1 (de-scaler; 1,500			
	g; 1,125 gallons) and 5 (corrosion inhi	bitor; 940 gallons) are	stored in a	in on-site tank. This storage			
tank is pumped for off-sit	e disposal ~ twice/yr.						
Describe process from wh	nich batch originated (spent bath, e.g.)	: N/A					
Approximate duration of							
		Comments (Totalizer		vatah ta aatimata daily flavo			
will approval from and v	vitnessed by the City reps, the facility	used a 3 gailoil bucket	and stop v	value to estimate daily nows.			

Attachme	nt D: Ch	emical Sto	rage Area(s	) the state of the
Does the facility have a designated chemical storage	e area(s)?	⊠Yes	□No	
Was this area(s) visually inspected?		$\boxtimes$ Yes	□No [	□N/A
(distant assembly room not extensively inspected, o	nly proces	s wastewate		
Describe Chemical Storage Area(s)	Are there drains in	floor this area?	If yes, where	does this drain lead to?
1. A barrel per each work tank of the phosphatizing line was sitting on a drum pallet.	□Yes	⊠No	Pretreatn	nent Sanitary Sewer Storm Sewer
2. Very little overstock of phosphatizing line stored in a shelved/protected area.	□Yes	⊠No	Pretreatn	nent Sanitary Sewer Storm Sewer
3. Fuel and various oils are kept in a separate building where final assembly and service is conducted.	□Yes	⊠No	Pretreatn	nent  Sanitary Sewer  Storm Sewer
4. A small amount of chain/conveyor lube oil is pumped from a small rectangular container to the above spray nozzles on conveyor line ~ every 4 hrs. Any drippage at that point is simply caught on an oil-sorb mat.	□Yes	⊠No	Pretreatn	nent  Sanitary Sewer  Storm Sewer
Does the Chemical Storage Area(s) contain any of t	he followi	ng?		
Dikes, Berms for Containment	Plug	s for Floor	Drains	
Secondary Tanks for Holding	Pren	nix (low) Co	oncentrations	
Alarms	Cha	in restraints,	, limited acces	s
Spills Control Kits for Cleanup	☐ Noti	fication Pro	cedures	
Chemical desegregation within Storage Area	Othe	er		
Chemical Inventory List (MSDS) on file?		⊠Yes	□No [	]N/A
Time constraints did not allow for a comprehensive	review of	the facility'	s entire MSDS	book.
Were any new MSDS reviewed during the Inspection	on?	Yes	□No	₫N/A
Chemical storage comments: Adequate, no commen	nt.			
Chemical handling procedures (totes, dolly, buckets loading dock to the main storage area; then to the in			use rolling pal	let "jacks" to transfer barrels from the
Hazardous waste chemical handling procedures (pro	perly seal	ed container	rs, labeled, ma	nifests, etc): N/A

Attachment E: Accidental Discharge/Slug Control Plan	THE REAL PROPERTY OF
Does the facility have an accidental discharge/Slug control plan? Slug discharge potential deemed negligible.	☐ yes   ⊠ no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	`
Is the spill/slug control plan <2 years old?	☐ yes ☐ no ☒ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☐ yes ☐ no ☒ N/A
(B) Describes storage and handling of 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/hazardous pollutants	☐ yes ☐ no ☒ N/A
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 Spill/Slug Notification Procedures posted?	☐ yes ☐ no ☐ N/A
Are they posted in areas where chemicals are used and stored?	☐ yes ☐ no ☒ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	yes no N/A
This is part of their "apprenticeship" program.	
Has there been any non-routine, episodic chemical spills discharged to the City in the past year?	yes 🛛 no
(Briefly Describe, Include Dates) N/A	
Was the City notified of these occurrences? ☐ yes ☐ no ☒ N/A	
Visual Inspection of Discharge Lines/Points	<b>对于国际国际企业</b>
~2' deep sump just outside the NE side of the building where the phosphatizing takes place. The sampli easy access, but sampling point (2" PVC) is too close to stagnant sump water level (~8" deep). When in sending wastewater to the sampling sump the sampling point is quickly covered up so a representative sataken. See Attachment A-1.	side sump kicks on
Entire sump and pipes were coated with what looked like Fe oxide	
Total Flow Monitoring Point: 5 gallon bucket test with stop watch.	
Upstream Manhole: N/A	
Point of Connection: Near discharge point	

Attachment I	F: Self-Monitoring & if CFR 43	3, TTC	O/TOMP Requirements
Have Operator (or person collecting to descriptions. Include name of individ (in sump) to capture a mix of frequen	the sample) to describe how compositual and title. One would have to croatly discharged process wastewater and o obtain sample. Discussions ensued	te and guch downd	grab samples are collected and preserved. Record wn and reach into the below grade discharge pipe was already standing in the sump. Sample bottle ling modifying the discharge pipe keep discharge
Where is the sample point located?			
	Pretreatment Effluent	ПТо	otal Flow
Combined Flow	☐ Metered Flow	Flo	ow Actuator
Private Manhole	Utility Manhole	Ad	dvance Notice Required
Is the Sample Collection Site Adequa	nte?		☐ Yes ☐ No ☐ N/A
Does the facility rep. request a split	t sample on this sampling/inspectio	n?	Yes No
Does the facility perform self-monito	ring tests in-house?		☐ Yes ☒ No ☐ N/A
If no, record the name and addre American Interplex (Toxic Organics)		g Labs	(Metals), 3301Langley Dr., Searcy, AR;
Automatic Sampler  or Manual	<u> </u>		
IU Self-Monitoring Results reviewed	: (from 3/29/13 "90 day compliance	report")	)
Is the Contract Lab certified by	ADEQ for test parameters?		☐ Yes ☐ No ☐ N/A
Dates and Times of Sample Ana	alysis Recorded?		
Correct Methods Used for Test	Analysis (Refer To 40CFR Part 136)	•	☐ Yes ☐ No ☐ N/A
EPA recommended holding time	es being met (Refer to 40CFR Part 12	36)	☐ Yes ☐ No ☐ N/A
Chain of Custody Records for S	self-Monitoring Samples Reviewed		Yes No N/A incomplete
Were correct Sample Types Col	llected		Yes No N/A unknown
Dates and times of Sample Coll	ection Recorded?		
Were Samples preserved correc	tly (refer to 40CFR Part 136)		
Were Self Monitoring records of	on file for past 3 years?		Yes No N/A Facility just began semi-annual reporting
Toxic Organic Management Plan (	TOMP) for Metal Finishers under	CFR 4.	33 F F F R T A T T T T T T T T T T T T T T T T T
How does the IU comply with the T			ertification Statement
Does the facility have a Toxic Organi		No [	□ N/A
If yes, Does the plan show how toxic	organics are used, stored, and dispos	sed? 🔲	Yes No N/A
List the date of the last revision			
Is the TOMP being followed as	written? Yes No No N/A T	oxic Or	rganic Management Plan yet to be submitted
If no, is there evidence that a TOMP			
Comments: Initial TTO scan submitte	ed with their 3/29/13 "90 day complia	ance rep	port" indicated non-detects for all toxic organics.





Attachment A-3



5301 Northshore Drive North Little Rock, AR 72118 Telephone: 501-682-0744

Client Report For:

Bad Boy 2013 1228-1231

Attention:

**Client Address:** 

Report Date:

May 06, 2013

LAB ID:

Comment:

AR13APR18-01

Approved By: All Siller

Date:May 06, 2013

Laboratory Contact: Jeff Ruehr

Ruehr@adeq.state.ar.us

501-682-0955

Client: Special Samples Client Sample ID: Bad Boy #1

<u>Lab ID:</u> 2013-1228 <u>Collection Date:</u> 4/17/2013 9:28:00 AM

Matrix: Water

# **Analyses**

	<u>,</u>	Result	Batch: 13050110	) Run: 1 MDL	<u>Qual</u>	<u>Unit</u>
Aluminum	79		<u>Limit</u> 20	20		ug/L
Antimony	<10	HOTENDY FEARER	10	5		ug/L
Arsenic	2.04			0.5		ug/L
Barium	20.	AND ALEMAND PARCLEMENT	10	2.0		ug/L
Beryllium	<0,		0.5	0.1	Mary Washing	ug/L
Boron	843		25	5.0		ug/L
Cadmium	<1		111	0.3		ug/L
Calcium	33.		0.04	0.04		mg/L
Chromium	1.66	S		0.3		ug/L
Cobalt	<1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 ×		。1996年代 - 1996年 - 1995年 - 1996年 - 199	0.5		ug/L
Copper	1.20		1	0.5		ug/L
ron	735		20	10.0	WEIGHT SE	ug/L
_ead	<1		7 (Part 1977)	0.1		ug/L
Magnesium	8.91	The state of the s	0.1	0.1	avener et en	mg/L
Manganese	61.2			0.2		ug/L
Nickel	12.2		2.5	0.5		ug/L
Potassium	1.48		1 1	0.05		mg/L
Selenium	<2	entillement of the property of the second of the	2	0.5	Secret Middle con 18649	ug/L
Silver	<5.		5	1.0		ug/L
Sodium	3.07	- Commence of the Control of the Con	0.04	0.02		mg/L
Thallium	<2.5		2.5	0.05	a Allenda y Sadjalina. A sa Allaha a sa	ug/L
Vanadium	827		2.5	1.0		ug/L
Zinc	23.0		3	2.0		ug/L
Dilution Factor	1					
Analyzed By	Cha	d Carrington				
Analysis Date/Time	Apr	24 2013 5:32AM				

Prep Date/Time

Laboratory Contact: Jeff Ruehr

Ruehr@adeq.state.ar.us

501-682-0955

Client: Special Samples Client Sample ID: Bad Boy #1b

Lab ID: 2013-1229 Collection Date: 4/17/2013 12:15:00 PM

Matrix: Water

## **Analyses**

Prep Date/Time

Metals by EPA 200.8	EPA 200.8		Batch: 13050110	Run:	1	
		Result	Reporting <u>Limit</u>	<u>MDL</u>	Qual	<u>Unit</u>
Aluminum	86	5.0	20	20	A contract of the contract of	ug/L
Antimony	<	10	10	5	100 p. 11 - 11 - 12 - 1	ug/L
Arsenic	2.	00	1	0.5		ug/L
Barium	20	).6	10	2.0	gers, semigipt, see,	ug/L
Beryllium	<(	).5	0.5	0.1		ug/L
Boron	81	16	25	5.0		ug/L
Cadmium	<			-0.3		ug/L
Calcium	33	8.4	0.04	0.04		mg/L
Chromium	4.	56	1 4 1	0.3	W. E.E.	ug/L
Cobalt	8 FOR HOLD - 1943 E. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	official recommendance with magnetic of the comment of the	T	0.5	I to care the control of the control	ug/L
Copper		41		0.5		ug/L
Iron	73	860	20	10.0		ug/L
Lead	<1	<b>京选工艺工艺</b> 、	1	0.1		ug/L
Magnesium	9.	50	0.1	0.1	ogra, ygggarti enter eg	mg/L
Manganese	55	0.2		0.2		ug/L
Nickel	13	3.0	2.5	0.5		ug/L
Potassium	1	53	1	0.05		mg/L
Selenium		) 	2	0.5	TOOL FLANDSON E IT I	ug/L
Silver			5	1.0		ug/L
Sodium	14	. And the determinant of the second control	0.04	0.02		mg/L
Thallium		2.5	2.5	0.05	Philippi Million Control (1997) Stranding (1997)	ug/L
Vanadium	91	1	2.5	1.0	Annual Commence of	ug/L
Zinc	22	2.8	3	2.0		ug/L
Dilution Factor	1	Alleg South Constitution of managed	The second secon	COMMITTER CONTRACTOR	ercia di mani	
Analyzed By	CI	nad Carrington				
Analysis Date/Time	A)	or 24 2013 5:57AM	er sog sekentillittinger ga. da mallipliker († 1926-berger epstimanninger)	SECURITION (AE)	AND DESIGNATION OF THE PARTY OF	. 4150 7 4 4
Prep By						

Laboratory Contact: Jeff Ruehr

Ruehr@adeq.state.ar.us

501-682-0955

Client: **Special Samples** Client Sample ID: Bad Boy #2

Collection Date: 4/17/2013 8:05:00 AM Lab ID: 2013-1230

Matrix: Water

# **Analyses**

Metals by EPA 200.8	EPA 200.8		Batch: 13050110	Run:	1	
		Result	Reporting Limit	MDL	<u>Qual</u>	<u>!</u>
Aluminum		96.0	20	20		
Antimony	STEEL OF THE STEEL S	<10	10	5	Disconnection of Archaelia and Archaelia	
Arsenic		9.99	A THE STATE OF THE	0.5		
Barium		24.1	10	2.0		10.000 - 10
Beryllium Kang P		<0.5	0.5	0.1		S TAY
Boron	The second secon	507	25	5.0	The Principles of the Waterman	
Cadmium		<1		0.3		
Calcium	anominiminiminimo ( ) for productivities ( Abra 1922) definiminata ( a	35.3	0.04	0.04	CASTON COMPANY CONTRACTOR	IIII-SIIIN (), 4
Chromium		2.70		0.3		W
Cobalt	AND	1.34	1	0.5	and the extension to extrinsionally are	16,81747
Copper		14.9		0.5		
Lead	Car areas - weather many real control	<1	1	0.1	Complete Committee	
Magnesium		8.96	0.1	0.1		
Manganese	man and a second se	199	The second secon	0.2	m 'es i Joseph milita deri da liami	
Nickel		27.5	2.5	0.5		
Potassium	to a meraminal A. & miniminal illudoscension and an analysis ( ) . V. T. T.	1.7	1. 1. Section 10 (Philadelia) Deliabel Learnmenton and Control Section 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	0.05		I
Selenium		<b>&lt;2</b>	2 2	0.5		
Silver		<5	5	1.0	THE COURT OF STREET	
Sodium		2.00	0.04	0.02		
Thallium	to blann me we commune Araba	<2.5	2.5	0.05		
Vanadium		166	2.5	1.0		
Zinc		132	3	2.0		
Dilution Factor						
Analyzed By		Chad Carrington	The state of the s			
Analysis Date/Time		Apr 24 2013 6:17AM				
Prep By	A STATE OF THE STA		N. A. Mandel and M. S. J. S. and		The state of the s	

Total Metals by EPA 200.8

EPA 200.8

Batch: 13050110 Run: 2

MDL Unit **Result** Reporting Qual <u>Limit</u>

Laboratory Contact: Jeff Ruehr

Ruehr@adeq.state.ar.us

501-682-0955

 Iron
 9980
 400
 10.0
 ug/L

 Dilution Factor
 20
 ...
 ...
 ...

 Analyzed By
 Chad Carrington
 ...
 ...
 ...

 Analysis Date/Time
 Apr 24 2013 12:19PM
 ...
 ...

 Prep By
 ...
 ...
 ...

 Prep Date/Time
 ...
 ...
 ...

Laboratory Contact: Jeff Ruehr

Ruehr@adeq.state.ar.us

501-682-0955

Client: Special Samples Client Sample ID: Bad Boy #16- 26 AF

Lab ID: 2013-1231 Collection Date: 4/17/2013 12:20:00 PM

Matrix: Water

# **Analyses**

otal Metals by EPA 200.8	EPA 200.8	Batch: 13050	110 Run:	1	
	Res	sult Reporting Limit	MDL	<u>Qual</u>	<u>Unit</u>
Aluminum	135	20	20		ug/L
Antimony	<10	10	5		ug/L
Arsenic	14.7	organica e e en camaza de este este esta esta esta esta esta est	0.5	жизначинийн түслтчүү, точк з	ug/L
Barium	34.2	10	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	468	25	5.0		ug/L
Cadmium	<1	уучуу ондооноо нолгон оо него да с него с него данын наганалын на	0.3	A Allegary Chillian Channe	ug/L
Calcium	34.4	0.04	0.04		mg/L
Chromium	4.82	1	0.3		ug/L
Cobalt	2.00		0,5		ug/L
Copper	25.5	1	0.5	Control of Additional	ug/L
Magnesium	9.74	0.1	0.1		mg/L
Manganese	302	1	0.2		ug/L
Nickel	41.4	2.5	0.5		ug/L
Potassium	1.62	1	0.05	- A de Samulado	mg/L
Selenium	<2	2	0.5		ug/L
Silver	<5	5	1.0	rampled to make mining a 17-A 72	ug/L
Sodium	2.16	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05	***************************************	ug/L
Vanadium	1240	2.5	1.0		ug/L
Zinc	200	3	2.0	- 1-4. Colonia VIII VIII VIII VIII VIII VIII VIII VI	ug/L
Dilution Factor	1	College Colleg			
Analyzed By	Chad C	arrington	tori Camalionaryo, me 939 :	7. 25 c d a considerate. Name of	
Analysis Date/Time	Apr 24 2	2013 6:42AM			
Prep By	The control of the second of t	over monore the least of the le	- P. S. LEWIS C. C. S.	AND OF SEC. MEMBER 5	- commercial designation of the control of the cont
Prep Date/Time					

Total Metals by EPA 200.8	EPA 200.8	Batch: 130501	Batch: 13050110 Run: 2			
	<u>Result</u>	Reporting	MDL	<u>Qual</u>	<u>Unit</u>	
		<u>Limit</u>				
Iron	17200	400	10.0		ug/L	

Laboratory Contact: Jeff Ruehr

Ruehr@adeq.state.ar.us

501-682-0955

Dilution Factor

20

Analyzed By

Chad Carrington

Analysis Date/Time

Apr 24 2013 12:32PM

Prep By

Prep Date/Time