

ADEQ

ARKANSAS
Department of Environmental Quality

May 13, 2011

Kevin Campbell
Assistant Plant Manager
EZ Loader Custom Boat Trailers, Inc.
6533 HWY 126 North
P.O. Box 270
Midway, AR 72651

Re: EZ Loader Pretreatment Compliance Assurance Visit-CAV (ARP001055; Mountain Home #AR0021211)

Dear Mr. Campbell:

Under 40 CFR 403.8(f)(1)(i): “[ADEQ is required to] Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by [EZ Loader], compliance or noncompliance with applicable Pretreatment Standards and Requirements...Representatives of [ADEQ] shall be authorized to enter [the] premises of [EZ Loader] in which a Discharge source or treatment system is located or in which records are required to be kept under §403.12(o) to assure compliance with Pretreatment Standards...”

Please find enclosed the completed CAV conducted at your facility on 12/14/10. Apologizes are extended for the tardiness of this report. EZ Loader appears to be compliant with the general Pretreatment Regulations found in 40 CFR 403 and specifically, the categorical Metal Finishing pretreatment standards per 40 CFR 433.17.

The two (2) grab samples taken were analyzed by ADEQ’s laboratory showing compliance with the most stringent “monthly average shall not exceed” pretreatment standards for new sources (see Certificate of Analysis in Attachment A-1). All metals analyzed were below the federal guideline limitations.

Recommendations:


Be aware of your zinc results and possible source(s). The average of the two (2) samples taken is 1.13 mg/l and compliant. The second grab sample taken at 3:00 p.m. indicated 1.35 mg/l and is fairly close to the Metal Finishing “monthly average shall not exceed”standard of 1.48 mg/l. For your compliance monitoring, you may want to spread your grab samples throughout the day to average these results to reveal your representative flow.

Note: I've changed your NAICS # to 336212 on the "Pretreatment Industrial Inspection" (page 3) which more correctly reflects your end product.

It was a pleasure working with you and your staff. Your open cooperation and willingness to share requested information is greatly appreciated.

If you should have further questions or comments regarding this report, please feel free to contact this office at (501) 682-0625.

Sincerely,



Allen Gilliam
ADEQ State Pretreatment Coordinator

Attachments: 12/14/10 "Pretreatment Industrial Inspection" and A-1 (ADEQ's analysis)

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**Pretreatment Industrial Inspection
Facility Information**

Facility Name:		Site Address:	
EZ Loader Custom Boat Trailers		6533 Hwy 126 North Midway, AR 72651	
Signatory Authority (Name & Title): Gary L. Potter – Vice President / General Manager			
Phone: 870.481.5138 X-227		Mailing Address (if different): P.O. Box 270	
Fax: 870.481.5150		Midway, AR 72651	
Address: Same		Corporate Owner Name and address (if applicable): Randy Johnson, 717 North Hamilton Street P.O. Box 270 / Spokane, WA 99220	
Phone: Same			
Fax: Same			
Contact Person (Name & Title): Kevin Campbell		Corporate CEO:	
Phone: 870.481.5138 X-259		Phone: 509.489.0181	
Kyle Kerns –Maintenance Manager		Fax: 509.489.0404	
e-mail: <u>kcampbell@ezloader.com</u>		e-mail:	
Facility Permit/Tracking # ARP001055		Last Inspection Date: 11/13/07	
POTW (City) IU discharges to: Mt. Home	POTW's NPDES #AR0021211	<input type="checkbox"/> Significant	AFIN# 03-00177 03-00070
Industrial Classification:			<input checked="" type="checkbox"/> Categorical
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17 Began ops 12/5/06			
Table of Contents			
I. Summary of Inspection		Page 2 of 10	
A. Inspection Objectives			
B. Inspection Analysis			
II. Pre-Inspection Meeting		Page 3 of 10	
A. General Information			
B. Facility Permits			
C. Additional Comments			
III. Attachments “Yes” indicates item exists at the facility and attachments will be included			
“No” indicates item does not exist at the facility and attachments aren't necessary			
A. Industrial Processes		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 5 of 10	
B. Pollution Prevention Activities		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 6 of 10	
C. Pretreatment System <i>(not necessary)</i>		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 7 of 10	
D. Chemical Storage		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 8 of 10	
E. Spill/Slug Control Plan		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 9 of 10	
F. Self-Monitoring/TOMP		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 10 of 10	
Comments: <i>Facility compliant w/ 40 CFR 403 & 40 CFR 433</i>			
Inspector's Name (Print): Allen Gilliam		Signature: <i>Allen Gilliam</i>	
IU Rep's Name (Print): <i>Kevin D. Campbell</i>		Signature: <i>Kevin D. Campbell</i>	
Date and Time Inspection Ended: 12/14/10 @ <i>3:00 pm</i>			

I. Summary of Inspection			
A. Inspection and Objective (Complete Before Inspection)			
<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Bi-Annual	<input type="checkbox"/> Spill/Slug	<input type="checkbox"/> Unscheduled
<input type="checkbox"/> New Construction	<input type="checkbox"/> Noncompliance	<input type="checkbox"/> Follow-up	<input type="checkbox"/> Complaint
Inspection Objective(s): Verify compliance with 40 CFRs 433 and 403 requirements			
Checklist of items to be reviewed, discussed and/or visually inspected:			
<input checked="" type="checkbox"/> Pre-inspection Meeting	<input type="checkbox"/> Pretreatment Process N/A	<input type="checkbox"/> Safety Concerns (negligible)	
<input checked="" type="checkbox"/> Process Inspection	<input checked="" type="checkbox"/> Discharge point(s)	<input checked="" type="checkbox"/> TOMP	
<input checked="" type="checkbox"/> Chemical Storage	<input type="checkbox"/> RCRA information	<input checked="" type="checkbox"/> Spills/Slug Control Plan	
<input checked="" type="checkbox"/> Records Review	<input checked="" type="checkbox"/> Flow/pH Meter(s)	<input checked="" type="checkbox"/> Process/Flow/Wastewater flow schematics	
<input checked="" type="checkbox"/> IU sampling procedures	<input type="checkbox"/> New MSDS N/A	<input type="checkbox"/> Calibration Records	
<input checked="" type="checkbox"/> MSDS Inventory List (limited)	<input type="checkbox"/>	<input type="checkbox"/>	
Comments: Flows are measured using volume marks on holding tank(s) when batch discharging to City.			
B. Inspection Analysis			
Were there any deficiencies/violations identified and noted during the inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
EZ Loader appeared to be compliant with the federal regulations in 40 CFRs 403 & 433. (see Attachment A-1 for ADEQ's certificate of analysis from grab samples taken during inspection, T. Metals only)			
Provide a brief narrative of deficiencies/violations or other concerns in the following areas:			
Records Review: Facility files were not comprehensively reviewed although correspondence and data were readily available. IU rep understood that all pretreatment records were to be maintained at least for a 3 yr period.			
Process Area(s): Appeared orderly and clean.			
Pretreatment System: No pretreatment necessary except pH adjustment to satisfy City's upper limit of 9 s.u.			
Self Monitoring Procedures: Adequate, using an R/O water-rinsed pyrex measuring cup to pour into State certified contract lab's pre-preserved sample containers. Good sampling logs kept.			
Spill/Slug Control Plan: No Slug Discharge potential determined. Process wastewater has to be manually pumped from a sump to one of two holding tanks. Then a trained operator is responsible for opening valves allowing discharge to City.			
Sampling Point: Adequate for grab sampling. Easy access. Facility batch discharges.			
Chemical Storage: Adequate with very few storage areas. Building's concrete slab floor slopes to the middle of facility, not towards the sump to the holding tanks. Paints are kept in a separate mixing room with a sliding metal window for transfer of mixture(s) to the paint booth operators. Room is well ventilated and self-contained			

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 12/14/10 @ 10:20 a.m.		SIC code(s): 3399; NAICS code: 336212	
IU Reps/Titles		Control Authority Reps/Titles	
Kevin Campbell/Safety & Compliance Mgr. Kyle Kerns/ Maintenance Supervisor Dwight Neal/Foreman		Allen Gilliam/ADEQ State Pretreatment Coordinator	
End product(s): Custom (steel) boat trailers		Approx. # of units produced: ~4,500/yr	
Days of Operation: Monday thru Thursday		Days of Production (if different): same	
Hours of Operation: 5 a.m. to 4:30 p.m.		Hours of Production (if different): same	
Shift 1, hrs.: 5 a.m. to 4:30 p.m.	Shift 2, hrs.: N/A	Shift 3, hrs.: N/A	
# of Employees: ~70	Peak Mos.: "not noticeable"	"Off" Mos.: June/July	
Are there any scheduled plant shutdowns? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If yes, when? Weeks of July 4 th & Dec. 25 th			
Are there designated plant clean-up days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If yes, when? ~once/quarter (random, as needed)			
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
If No, explain: N/A			
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
If Yes, explain:			
Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: <input checked="" type="checkbox"/> Yes. <input type="checkbox"/> No			
If Yes, explain: Eye protection necessary			
Has there been any changes since the last inspection regarding the following items:			
Plant/flow/process layout? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, obtain copy of updated schematic for facility file. Old wash area was moved to a new wash bay to make more efficient product flow. Not shown on new schematic is that the process wastewater is pumped from the sump overhead via PVC pipe to the holding tanks.			
Processes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Production Levels? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: Demand/production has recently dropped due to the economy.			
Raw materials? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: " " " "			
Flow rates? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: " " " "			
Are regulated and non-regulated wastestreams combined? yes <input type="checkbox"/> no <input checked="" type="checkbox"/>			
Prior to Pretreatment System? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
If Yes, was the CWF used to calculate limits? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
Prior to connection to the POTW sanitary sewer? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
At connection to sanitary sewer? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
What is the current avg. process flow? Batch discharged @ ~300 to 400 gpd			

B. Facility Permits		
Permit Type	Permit No.	Expiration Date
Air	0926-AR-5	8/7/07 (issued, no expiration date)
RCRA	ARD983267105	Active
NPDES	N/A	
NPDES Storm Runoff	ARR00A651	2/01/11
C. Additional Comments		
(Note which section or attachment comments are regarding) Pre-Inspection ADEQ file review		
Empty chemical totes are outside waiting for supplier to pick them up.		

Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not

1. Alkaline Cleaning	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4.	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Phosphoric Acid / rinse	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5.	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Sanitary Sewer	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	6.	Yes <input type="checkbox"/> No <input type="checkbox"/>

Were processes visually inspected? Yes No N/A

Brief description of process(es): Trailer frames (already formed, GMA welded, machined, punched, etc.) are physically carted to "wash booth" area. The frames are first manually alkaline cleaned/degreased (SteelPrep 400), rinsed, manually hi-pressure sprayed with a hot phosphoric acid wash (SteelPrep 300), then sprayed with a fresh water rinse, air dried and then sent to a "heating room", then to painting. This is the only area where there is regulated wastewater generated. The floor in this area is sloped towards a grated sump which is pumped into one of the two holding tanks on the other side of the wall. Pump intake in this sump is about 3" from the bottom which allows the "heavies"/grit/trash to settle out. This is shoveled out about every 2 weeks. They've added a finer screen to the sump grating to keep out as much trash as possible to help save on pump clean-out/maintenance. Chemicals used in this operation are pumped to the operator via hoses connected to appropriate tote. Frames are hoisted onto conveyor system, sent through the primer room (or manual line, as needed), then the paint room prior to being sent through the bake oven. After cooling, the remaining operations include assembly of finished trailer (pen-striping, adding axles, brakes, tires, electrical wiring, lights, connecting of specialty chrome and carpet parts, hitch assembly, etc).

General observations of facility's indoor housekeeping: Generally clean with no visible fluid puddles.

General observations of area outside facility's building: Clean and orderly with very little raw material exposed.

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured (M) or estimated (E). If batch (B) discharged, list frequency and volume (1000 gal/month, e.g.).

<input checked="" type="checkbox"/> Entire Alkaline / Phosphoric acid process (B/M) @ ~ 300 to 400 gpd	<input type="checkbox"/> Equip. Cleanup	<input type="checkbox"/> Floor Cleanup (floors manually swept)	<input type="checkbox"/> Spent Bath Solutions
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List Major Raw Materials and Chemicals used:

Steel tube (square/rectangular/angle), aluminum, sodium hydroxide (SteelPrep 400), phosphoric acid (SteelPrep 300), numerous colors of paint, acetone and butyl alcohol.

Check Waste Stream Pollutants of Concern from Process(es):

<input type="checkbox"/> BOD	<input checked="" type="checkbox"/> CN ⁻	<input checked="" type="checkbox"/> Metals (List): All CFR 433 Metals	<input type="checkbox"/> Solvents (List) Submitted approvable TOMP 6/9/09. On file. Certification only.
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pH IU calibrates their pH meters with proper buffers and keeps logs.

Are there floor drains in the Process area? Yes No There's only the one sump in the process area where all process wastewater gravity drains to. This floor sump is pumped via overhead PVC piping to one of the two holding tanks for pH adjustment as necessary

Attachment B: Pollution Prevention (P2) / Recycling Activities

Does the facility have a written P2 Plan? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Does this facility practice P2? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Facility distills its used acetone (from cleaning paint guns). They reclaim/re-use about 80% of this each cycle. They have no problem remaining a SQ haz waste generator.	
Environmental Management System in place? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
ISO Certified? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Written Standard Operating Procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explain: Each station has its own written SOP.	
Preventative Maintenance Program Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (hydraulic systems, valves, pumps, etc) Explain: SOPs explain to operator(s) how to check for spray equipment plugging, leaking valves or connections, etc	
Water Reuse: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Explain:	
Cost Accounting to Track Savings: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Explain:	
Inventory Control / "Green Purchasing": Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (lean manufacturing/"env. friendly purchasing", etc) Explain: Facility orders just enough raw material for customer needs/orders.	
Employee Training: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explain: Annual spill prevention training (OSHA and corporate required) as well as individual station SOP reviews.	
Recycle Waste Oil, Solvents, and Lubricants? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explain: Distillation for re-use of solvents.	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explain: They recycle aluminum, have cardboard baler for recycling, scrap steel to recycler, wooden pallets to reconditioner.	
Other Activities	
P2 Equipment/Practices in use:	
<input checked="" type="checkbox"/> Overflow Alarms (On holding tanks and process w.w. sump)	<input type="checkbox"/> Aqueous Cleaning Solutions
<input type="checkbox"/> Fog Spray Rinsing	<input type="checkbox"/> Countercurrent Rinsing
<input type="checkbox"/> Dragout Collection Trays	<input type="checkbox"/> Seal-Less Pumps
<input checked="" type="checkbox"/> Forced Air to Blow Parts Dry (hand held air nozzles)	<input type="checkbox"/> Secondary Containment of Process Solutions
<input type="checkbox"/> Aqueous Paint Stripping Solutions	<input checked="" type="checkbox"/> "Star-Lite" material blasting to remove paint
<input checked="" type="checkbox"/> Water Soluble Cutting Fluids	<input type="checkbox"/> Recycle Overspray
<input type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input type="checkbox"/> Conductivity Meters
<input checked="" type="checkbox"/> Air agitation in holding tanks	<input type="checkbox"/> Bath / Rinse Filtration

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment? (*Pretreatment not necessary*) Yes No N/A

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:

<input type="checkbox"/> Dissolved air floatation	<input type="checkbox"/> Membrane Tech.	<input type="checkbox"/> Ion Exchange	<input type="checkbox"/> Biological Treatment
<input type="checkbox"/> Centrifugation	<input type="checkbox"/> Flow Equalization	<input type="checkbox"/> Ozonation	<input type="checkbox"/> Chlorinating
<input type="checkbox"/> Chemical Precipitation	<input type="checkbox"/> Oil/Water Separation	<input type="checkbox"/> Reverse Osmosis	<input type="checkbox"/> Grit Removal
<input type="checkbox"/> Sludge Filter Press	<input type="checkbox"/> Grease Trap	<input type="checkbox"/> Screen	<input type="checkbox"/> Solvent Separation
<input checked="" type="checkbox"/> pH Adjustment ("as needed")	<input type="checkbox"/> Sand Trap	<input checked="" type="checkbox"/> Sedimentation	<input type="checkbox"/> Silver Recovery
<input type="checkbox"/> Belt/Disk Oil Skimmer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide Brief Description of holding tanks (leaks, cleanliness, equipment not in working order): Clean, no evidence of leaks or spillage.

Does the description match the schematic currently on file? Yes No N/A

System Operator(s) Name: Kyle Kern's records are maintained on operator's daily log book containing extensive/daily pH/temperature/hardness readings and pH meter's calibration log records. Current log on pH calibration indicates time to change probes. Operator also keeps measurements on D.O. to determine if tanks need air agitation which will keep pH low (within City limits).

Does discharge permit require licensed operator? (Not required) Yes No N/A

Is training provided to the Holding Tank(s) system operator(s)? Yes No N/A

If Yes, list type and frequency: Yearly review of SOP.

Is the discharge from the holding tank System? Batch Continuous Combination

If any discharges are batch type or combination, describe the following:

Volume of each batch: 300 to 400 gallons per day (~1,200/week)

Describe process from which batch originated (spent bath, e.g.): alkaline/phosphoric acid cleaning (manual) spray and rinse.

Approximate duration of batch discharge:

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
N/A		

Attachment D: Chemical Storage Area(s)

Does the facility have a designated chemical storage area(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Was this area(s) visually inspected? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. Main storage area contains the steel "prep" chems. They're all connected by hoses to manual hi-pressure wands used by operator to clean/phosphatize trailer frames. These chems are kept in a separate room in wire framed totes.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
2. Paint mixing/storage area ("kitchen")	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
3. Paint storage "barn"	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
4. Drums of Primer (next to back oven)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
<input type="checkbox"/> Dikes, Berms for Containment	<input type="checkbox"/> Plugs for Floor Drains	
<input type="checkbox"/> Secondary Tanks for Holding	<input type="checkbox"/> Premix (low) Concentrations	
<input type="checkbox"/> Alarms	<input type="checkbox"/> Chain restraints, limited access	
<input checked="" type="checkbox"/> Spills Control Kits for Cleanup ("pig mats")	<input type="checkbox"/> Notification Procedures	
<input type="checkbox"/> Chemical desegregation within Storage Area	<input checked="" type="checkbox"/> Other: Floor is sloped to the middle of the building	
Chemical Inventory List (MSDS) on file? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Were any new MSDS reviewed during the Inspection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
If yes, list below: SteelPrep 300 and SteelPrep 400 (phosphoric acid and alkaline chemicals).		
<p>Chemical storage comments: Adequate. Chemicals stored are not in huge volumes. Paint "kitchen" is built to hold entire volume of paints in the room. Room is well ventilated and meets with the national fire exposure code with only one person responsible for mixing different paints to get desired final color. That small amount of finished paint is passed through a window to a person in the paint booth on the other side of the wall. Paint mixing room is actually a separate room within the building. It's designed with to contain entire volume of the paint in the numerous cans. ~3,300 active/current colors they can make. Containers of acetone (paint gun cleaner) and butyl alcohol are also stored in this room. Room is sloped to the center with the exterior walls sealed.</p>		
<p>Chemical handling procedures (totes, dolly, buckets, hardline, etc): 330 gallon totes (forklifted in) for wash chems, drum dollies, 4 gallon safety cans and 5 gallon sealed buckets.</p>		

Attachment E: Spill/Slug Control Plan

Does the facility have a Spill/Slug control plan? <i>Visual evaluation determined a slug discharge was not present. No slug discharge plan required.</i>	<input type="checkbox"/> yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(A) Describes discharge practices including non routine batch (slug) discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(B) Describes storage and handling of chemicals	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(C) Procedures for immediate notification to POTW of slug discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
2. Describes procedures and equipment for emergency response	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
3. Describes follow-up to limit damage suffered by POTW or environment	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted? N/A	<input type="checkbox"/> yes <input type="checkbox"/> no
Is it posted in areas where chemicals are used and stored? N/A	<input type="checkbox"/> yes <input type="checkbox"/> no
If Yes how many? N/A	
Are appropriate personnel provided training in the event of a spill?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? <input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point: ~2" PVC piping from bottom of one of the 2 holding tanks empties directly to sewer system. There's a "T" at the end of this pipe, both have valves, one for taking samples and the other for batch discharging to the City. Most recent (1/3/11) detailed schematic on file.	
Total Flow Monitoring Point: Batch discharges are measured by using marks on fiberglass tanks. Marks are in 500 gallon increments.	
Point of Connection: Direct connection to City's sewer system.	

Attachment F: Self-Monitoring & if CFR 433, TTO/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.

Kyle washes a large pyrex measuring cup with City supplied R/O water. He opens valve to the City and collects enough liquid for samples and then places them on ice. Sample bottles have correct preservatives in them by their contract lab. IU also takes daily pH readings w/proper calibration.

Where is the sample point located? At the N.E. corner of the holding tank room.

<input checked="" type="checkbox"/> End of Process	<input type="checkbox"/> Pretreatment Effluent	<input type="checkbox"/> Total Flow
<input type="checkbox"/> Combined Flow	<input type="checkbox"/> Metered Flow	<input type="checkbox"/> Flow Actuator
<input type="checkbox"/> Safety Hazards Identified	<input type="checkbox"/>	<input type="checkbox"/>

Is the Sample Collection Site Adequate? Yes No N/A

Does the facility rep. request a split sample on this sampling/inspection? Yes No

Does the facility perform self-monitoring tests in-house? Yes No N/A

If no, record the name and address of Contract Lab: Arkansas Analytical, Inc., 11701 I-30, Bldg. 1, Suite 115, Little Rock, AR 72209

Automatic Sampler or Manual

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? (IU began ops in '06) Yes No N/A

List the parameters the facility monitors and the frequency: all CFR 433 metals and CN twice/year. *Facility has submitted an approvable Toxic Organic Management Plan and Certifies in lieu of sampling/analyzing for toxic organics.

<input checked="" type="checkbox"/> Cd(t)	<input checked="" type="checkbox"/> Cu(t)	<input checked="" type="checkbox"/> Cr(t)	<input checked="" type="checkbox"/> Ni(t)	<input checked="" type="checkbox"/> Pb(t)
<input checked="" type="checkbox"/> Ag(t)	<input checked="" type="checkbox"/> Zn(t)	<input checked="" type="checkbox"/> pH	<input checked="" type="checkbox"/> CN'(t)	<input type="checkbox"/> CN'(a-c)
<input type="checkbox"/> TTO-Vol*	<input type="checkbox"/> TTO-B/N*	<input type="checkbox"/> TTO-A.E.*	<input type="checkbox"/> TTO-Pest*	<input type="checkbox"/> Cr(hex)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

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: 6/09/09

Is the TOMP being followed as written? Yes No N/A

Comments: A TOMP was submitted (dated 6/09/09) and deemed complete. Correspondence from ADEQ is in the facility's file.

Attachment A-1



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

Client Report For: EZ Loader (Mt. Home) 03-00177 2010 3889-3890

Attention:

Client Address:

Report Date: March 18, 2011
LAB ID: AR10DEC17-02

Comment:

Approved By: _____

Date: March 18, 2011

A-1

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock AR 72118

Laboratory Contact: Jeff Riehr
Riehr@aden.state.ar.us
501-682-0955

Client: Special Samples
Lab ID: 2010-3889

Client Sample ID: EZ Loader 1
Collection Date: 12/14/2010 11:20:00 AM

Matrix: Water

Analyses

Total Metals by EPA 200.8 EPA 200.8

Batch: 11010310 **Run:** 1

	Result	Reporting	MDL	Qual	Unit
Aluminum	3520*	20.0	20		ug/L
Antimony	14.7*	10.0	5		ug/L
Arsenic	23.5*	1.00	0.5		ug/L
Barium	97.3*	10.0	2.0		ug/L
Beryllium	<0.5*	0.5	0.1		ug/L
Boron	4150*	25.0	5.0		ug/L
Cadmium	<1.00*	1.00	0.3		ug/L
Calcium	11.8*	0.04	0.04		mg/L
Chromium	37.1*	1.00	0.3		ug/L
Cobalt	4.48*	1.00	0.5		ug/L
Copper	655*	1.00	0.5		ug/L
Iron	16700*	20.0	10.0		ug/L
Lead	3.33*	1.00	0.1		ug/L
Magnesium	11.4*	0.1	0.1		mg/L
Manganese	680*	1.0	0.2		ug/L
Nickel	54*	2.5	0.5		ug/L
Potassium	3.89*	1.00	0.05		mg/L
Selenium	<2.00*	2.00	0.5		ug/L
Silver	<5.00*	5.00	1.0		ug/L
Sodium	1060*	0.04	0.02		mg/L
Thallium	<2.5*	2.5	0.05		ug/L
Vanadium	270*	2.5	1.0		ug/L
Zinc	917*	3.00	2.0		ug/L

Dilution Factor
Analyzed By: Joe Semberski
Analysis Date/Time: Dec 30 2010 12:52PM
Prep By:
Prep Date/Time:

A-1

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock AR 72118

Laboratory Contact: Jeff Riehr
Riehr@aden.state.ar.us
501-682-0955

Client: Special Samples
Lab ID: 2010-3890

Client Sample ID: EZ Loader 2
Collection Date: 12/14/2010 3:00:00 PM

Matrix: Water

Analyses

Total Metals by EPA 200.8 EPA 200.8

Batch: 11010310 **Run:** 1

	Result	Reporting	MDL	Qual	Unit
Aluminum	5340*	20.0	20		ug/L
Antimony	13.1*	10.0	5		ug/L
Arsenic	23.1*	1.00	0.5		ug/L
Barium	144*	10.0	2.0		ug/L
Beryllium	<0.5*	0.5	0.1		ug/L
Boron	4170*	25.0	5.0		ug/L
Cadmium	<1.00*	1.00	0.3		ug/L
Calcium	14.1*	0.04	0.04		mg/L
Chromium	54.8*	1.00	0.3		ug/L
Cobalt	5.25*	1.00	0.5		ug/L
Copper	829*	1.00	0.5		ug/L
Iron	27500*	20.0	10.0		ug/L
Lead	5.14*	1.00	0.1		ug/L
Magnesium	10.5*	0.1	0.1		mg/L
Manganese	1000*	1.0	0.2		ug/L
Nickel	58*	2.5	0.5		ug/L
Potassium	3.65*	1.00	0.05		mg/L
Selenium	<2.00*	2.00	0.5		ug/L
Silver	<5.00*	5.00	1.0		ug/L
Sodium	985*	0.04	0.02		mg/L
Thallium	<2.5*	2.5	0.05		ug/L
Vanadium	309*	2.5	1.0		ug/L
Zinc	1350*	3.00	2.0		ug/L
Dilution Factor	1.0				

Analized By: Joe Semberski
Analysis Date/Time: Dec 30 2010 12:56PM
Prep By:
Prep Date/Time: