

# ADEQ

ARKANSAS  
Department of Environmental Quality

March 5, 2012

Larry Dunaway  
Public Works Director  
Nashville Public Works  
426 North Main  
Nashville, Arkansas 71852

Re: Nashville (NPDES #AR0021776; AFIN#3100036) Pretreatment Program  
Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Dunaway:

Please find enclosed the finished report for the audit/assessment conducted February 22 - 24, 2012. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the findings/deficiencies. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

The City appears to have personnel knowledgeable and interested in both the Pretreatment and Pollution Prevention Programs and their implementation. Many of the audit/assessment recommendations 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.

It was a pleasure working with your staff during the audit and becoming more familiar with the City of Nashville, its industries and Pretreatment and Pollution Prevention Programs.

Please feel free to contact this office with any questions at (501) 582-0625.

Sincerely,



Allen Gilliam  
NPDES Pretreatment Coordinator

cc: Rudy Molina/EPA 6WQ-PP  
Craig Uyeda/NPDES Enforcement Branch Manager  
Eric Fleming/NPDES Technical Assistance Manager

**PRETREATMENT PROGRAM AUDIT/  
POLLUTION PREVENTION ASSESSMENT  
CITY OF NASHVILLE, ARKANSAS  
NPDES PERMIT #AR0021776**

**March 5, 2012**

**PREPARED BY: ALLEN GILLIAM  
STATE PRETREATMENT COORDINATOR  
ADEQ**

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## **LIST OF ATTACHMENTS**

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation

## **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.

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

An audit/assessment was performed February 22 - 24, 2012, of the Pretreatment Program implemented by City of Nashville, Arkansas. Participants included:

Allen Gilliam            ADEQ/Pretreatment Coordinator

Ed Carlyle              City/Pretreatment Coordinator

Larry Dunaway        City/Public Works Director

The goals of the audit/assessment were:

- \* To determine the implementation and compliance status of the City of Nashville's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403;
- \* To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges;
- \* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements and;
- \* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

Nashville's Pretreatment Program was originally approved 4/12/93. There have been no modifications to date. Program modification requirements to be current with the "Streamlining" revisions to 40 CFR 403 were incorporated into the City's permit. The City is currently finalizing the draft Pretreatment Ordinance and Program sections along with completing the checklist for submittal.

The City's wastewater treatment plant consists of two (2) aerated lagoons followed by a two cell stabilization pond, two (2) dissolved air flotation devices, chlorination contact chamber, dechlorination and discharge to Mine Creek.

During the last three (3) years the City's effluent has exhibited sublethality in the fathead minnow once and the ceriodaphnia dubia eight (8) times. A toxic reduction evaluation (TRE) plan was submitted on 11/5/07 with the final TRE report submitted 4/20/10. Sub-lethal limits will be effective on 2/1/12.

The plant's design flow is 2.3 MGD and averages about 1.4 MGD with ~0.03 MGD being contributed by one (1) significant industrial user, a metal finisher regulated under 40 CFR 433. Another metal finisher has been issued a "no-discharge" permit and is hauling all its regulated wastewater off-site certifying monthly it is discharging no process wastewater.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to their two (2) 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 Nashville's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

*1)* Under **40 CFR 403.8(f)(2)(vi)**, “Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities [inspections] in order to identify, independent of information supplied by Industrial Users [IU], occasional and continuing noncompliance with Pretreatment Standards. Inspect and sample the effluent from each Significant Industrial User at least once a year...”

During the file review it was discovered comprehensive inspections were not being documented. The inspections lacked detailed information on the IUs' processes, pretreatment, chemical handling procedures, hazardous waste storage and the IUs' monitoring records (See “Audit Checklist's IU File Review, Section 9.a. through 9.q.” and Atch. A-5 for comparison).

Some inspection questions were not adequately answered. See Atch. A-5f regarding “Section IX. Slug Control, A. Does the IU have a Slug Control Plan?” The answer is marked “No”, but there's no explanation why the facility has no slug control plan.

Some of the inspection checklist questions are already documented in other correspondence located in the City's files. A narrative description of the manufacturing processes that generate regulated wastewater was found in the City's fact sheet (Atch. A-3). Jan-Eze's hazardous chemical storage and usage records were located in their 7/7/11 “Accidental Spill Prevention/Response Plan”. This information could easily be transferred to an inspection checklist or referred back to on the inspection form.

As discussed with the City's Pretreatment Coordinator, if this Audit's IU File Checklist inspection items were to have been addressed and well documented, the City's inspections would have been deemed adequate. It was suggested to complete such a comprehensive inspection and use a copy of it during subsequent inspections to use as a work copy to update any changes made at the IU. One of the first questions that should be asked at the beginning of an inspection should be, “Has there been any process, raw material or chemical changes made since the last inspection?”

*1a)* Jan-Eze's permit requires them to sample for the toxic organics in 40 CFR 433 “once/5 year permit”.

The facility has been compliant with this requirement, but the City must “Randomly sample and analyze the effluent from Industrial Users...in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards.”

Jan-Eze had submitted a toxic organic management plan (TOMP) to the City in 1995. No further correspondence from the City could be located and there were no City analysis located for the toxic organics to satisfy the above requirement.

The City can:

- 1) Either request an updated TOMP from Jan-Eze, review and approve it with documentation sent back to the facility stating approval and a certification statement [located in 40 CFR 433.12(a)] from the facility can be submitted in lieu of further testing for the toxic organics; or,
- 2) The City must require the TTO monitoring be conducted twice/year (minimum sampling frequency for Categorical Standards) and also monitor for the toxic organics at least once/year.

If the first option is chosen, the TTO limit in Jan-Eze's permit should be footnoted, "The facility has submitted an approved TOMP and is allowed to make the proper certification statement in lieu of monitoring for the toxic organics per 40 CFR 433.12".

2) Under **40 CFR 403.8(f)(2)(vi)**, "Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges..."

During the file review slug discharge evaluations were located, but were not completely filled out and somewhat confusing with their conclusions. Attachment A-6 has questions unanswered and no "attachments" were included with them.

The City must also send the industry correspondence verifying they do or do not need to develop a slug discharge plan, submitted and approved by the City. Documentation of this evaluation and any correspondence regarding a slug plan should be saved in the IU's file for future reference possibly in the Fact Sheet section.

3) Under **40 CFR 403.8(f)(2)(i)**, "[Nashville must] Identify and locate all possible Industrial Users [IUs] which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request; (ii) Identify the character and volume of pollutants contributed to the POTW by the Industrial Users identified under paragraph (f)(2)(i) of this section. This information shall be made available to the Regional Administrator or Director upon request..."

During the Audit checklist interview, it was determined the City had not conducted a comprehensive IU survey in some time. No "master list" or compilation of information from any previous IU surveys could be produced. The only list that was supplied was a water consumption report from the City's water billing department. This list had no information of value regarding what, if any, toxics may be on-site or being discharged from the businesses on that list.

The City must conduct these industrial/business surveys to ensure there are no non-domestic users discharging toxics into the City's sewage collection system. A copy of EPA's guidance on Industrial User Surveys was downloaded and printed during the Audit.

And, a master list must be made available upon request as required above. This compilation/synthesis may be stored electronically on a spreadsheet on the Pretreatment Coordinator's computer hard drive. EPA's downloaded guidance also included an example of such a master list.

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

1) Strongly recommend cross-training another person in the day-to-day activities of the City's Pretreatment Coordinator. It has been shown numerous times throughout the State a City's Pretreatment Program will suffer greatly upon the retirement or cessation of employment by the current City Pretreatment Coordinator without somebody being somewhat knowledgeable about the City's Pretreatment Program implementation/administrative requirements.

2) Strongly recommend including standard operating procedures for sampling, inspections and the day-to-day administrative activities of the City Pretreatment Coordinator in the City's Pretreatment Program. This would be invaluable for training persons new to the program.

3) Strongly recommend revising and dating existing fact sheets in each IU file updating pertinent information such as: processes/flows, schematics with sampling point clearly marked, basis for permit limits, rationale for being deemed "Significant", facility's corporate headquarter's environmental contact or registered agent, monitoring frequency, parameters monitored for, picture of actual sampling point, brief chronological history (start-up date, compliance, e.g.). As discussed during the audit, the basic information contained in a comprehensive IU inspection provides the bulk of a good fact sheet. These fact sheets should be sent to each knowledgeable IU representative to review and update per permit cycle.

EPA's "Industrial User Permitting Guidance Manual's", Appendix I contained what EPA would consider pertinent information needed on a comprehensive IU fact sheet. This guidance manual was located and in the possession of the City's Pretreatment Coordinator.

4) Recommend including questions asking about Pollution Prevention practices, water and energy conservation measures and Best Management Practices (BMP) on all industrial/non-domestic user surveys as well as including them on all permit applications.

5) Recommend requiring Aero-Metal to submit monthly (or quarterly) manifests of any waste they haul off-site. It is realized Aero-Metal is already submitting these, but their "No Discharge" permit should require this also to further substantiate there is no regulated wastewater being discharged to



the City's sewer system.

- 6) Recommend removing Jan-Eze's BOD and TSS limits. Historical analytical results indicated this facility's conventional pollutants are below domestic background levels and are of no value.
- 7) Recommend including both the City's AND the industry representative's signatures on the dated inspection reports.
- 8) Recommend writing public service notices to the City's local newspaper regarding the problems caused by disposing of kitchen grease down the sink. Fliers or newspaper articles could also focus on the potential toxic effects of disposing of unused or expired medications into the City's sewage collection system.

A short descriptive summary of the City's publicly owned wastewater treatment plant operations and purpose may help the citizens better understand their part in protecting their investment and the designated uses of Mine Creek.

**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**

- 1) Submit all necessary Pretreatment Program modifications to come into compliance with the revised "streamlining" provisions in 40 CFR 403. Keep in mind, these revision are not isolated to just the Pretreatment Ordinance. A completed Ordinance checklist must accompany the submittal.
- 2) Revise and submit to ADEQ the Local Limits Section of the City's Program to reflect the 10/05 maximum allowable headworks loading/concentrations (MAHLs/MAHCs) developed by ADEQ using the City's site specific data (correspondence from ADEQ to Nashville [to Ed Carlyle] dated 10/28/05).

\* \* \* \* \*

The City should consider the required actions and recommendations contained in this audit/assessment before finalizing any pretreatment program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, should be submitted to ADEQ for review and approval.

# PRETREATMENT AUDIT CHECKLIST

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I:	General Information . . . . .	Pages 1- 4
Section II:	Pretreatment Program Analysis . . . . .	Pages 5-17
Section III:	Industrial User File Evaluation . . . . .	Pages 18-26

### SECTION I: GENERAL INFORMATION

**A. GENERAL INFORMATION**

Control Authority Name: City of Nashville NPDES #: AR0021776  
 Mailing address: 426 N. Main Street, 71852

Permit Signatory: Larry Dunaway Title: Public Works Director

Telephone: 870.845.4015 FAX NUMBER: 870.845.7409

Pretreatment Contact: Ed Carlyle Title: Pretreatment Coord.  
 Address: 743 Hwy 27 South  
 Telephone: 870.845.7402 c- 870.557.3143  
 e-mail: mredcarlyle@yahoo.com

Pretreatment program approval date: 4/12/93

Dates of approval of any substantial modifications: N/A

Month Annual Pretreatment Report Due: February

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 2/22 - 2/24/12  
 (ASSESSMENT)

Inspector(s):

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
<u>Allen Gilliam</u>	<u>Pret. Coord/ADEQ</u>	<u>501.682.0625</u>

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>* Ed Carlyle</u>	<u>Same</u>	<u>Cell - 870.557.3143</u>

\* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>11/10/11</u>	<u>Satisfactory, but inspections are vague</u>
<u>PCI</u>	<u>11/4/09</u>	<u>Satisfactory</u>
<u>PCI</u>	<u>11/6/07</u>	<u>"Marginal" because City had not issued Aero-Metal a no-discharge permit.</u>

YES NO

      Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

.....  
The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with a asterisk or footnote that tells that there is more explanatory information and where it can be found.

# Section I: General Information

## B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR0021776	Nashville POTW	2/1/09	1/31/14

### 2. Individual Treatment Plant Information

a. Name of Treatment Plant: City of Nashville  
 Location Address: 743 Hwy 27 South

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 2.3 MGD; Actual (Average)- 1.4 MGD

Sewer System: 100 % # of SSOs due to grease blockages 1

#### Industrial Contribution to this Treatment Plant

# of SIUs: 2 # of CIUs: 2 (One non-discharging)

Industrial Flow (mgd): 0.04 Industrial Flow (%): 3.0 %

#### Level of Treatment

#### Type of Process(es):

Primary  Two aerated lagoons in parallel; a two

Secondary  cell stabilization pond and two DAFs

Tertiary  followed by a contact chamber

Method of Disinfection: Chlorination

Dechlorination  YES, with sulphur dioxide  YES

#### Effluent Discharge

Receiving Stream Name: Mine Creek the to Millwood Lake

Receiving Stream Classification: Segment 1C, Red River Basin

Receiving Stream Use: Primary contact recreation; raw water source for public, industrial and ag. uses; propagaation of desirable species of fish & other aquatic life

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

#### Method of Sludge Disposal:

#### Quantity of Sludge:

<input type="checkbox"/> Land Application	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Monofill	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Public Distribution	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Lagoon Storage	<input type="checkbox"/> ? dry tons/yr.
<input type="checkbox"/> Other (specify)	<input type="checkbox"/> dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals; NH3-N; TRC, Se & CN

**Section I: General Information**

a. (continuation of individual treatment plant information for Nashville Wastewater 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: ADEQ  
 Issuance Date: Same  
 Expiration Date: Same

List pollutants that are specified in current sludge permit:  
Reference 40 CFR 503

YES NO N/A

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

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There has been

no lethality shown in either species in the past 3 years. Sublethality has been shown in the fathead minnow & water flea once in 12/09 and 7 times to the water flea since 10/09 through 10/11 out of 30 tests. A TRE plan was submitted on 11/5/07 with the final report submitted on 4/20/10.

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u>      </u>	<u>      </u>
Priority **	<u>1</u>	<u>1</u>	<u>      </u>	<u>      </u>
Biomonitoring	<u>      </u>	<u>4</u>	<u>      </u>	<u>      </u>
TCLP	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Other:	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

\* 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.

"Stayed relatively the same"

YES NO N/A

&

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

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

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

Parameters Violated

Cause(s)

pH & TSS on 6/30/11  
TSS on 7/31/11  
NH3-N on 3/31 & 5/31/11

pH problems  
DAF problems  
??

YES NO

n/a

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

n/a 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: n/a

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

2. Modifications in Progress:

Date Requested	Nature of Modification
N/A	City is currently modifying their entire Program to be current with the Streamlining revisions to 40 CFR 403

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: 4/12/93 [WENDB-PTIM]

Date of most recent Ordinance approved by the Control authority: 3/16/93

Date of most recent Pretreatment Program modification approval: -

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:

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

n/a     Have provisions been made for the incorporation of Pollution Prevention (P<sup>2</sup>) 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:

	<u>Name of Jurisdiction</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1.	<u>n/a</u>	<u>   </u>	<u>   </u>	<u>   </u>
2.	<u>   </u>	<u>   </u>	<u>   </u>	<u>   </u>
3.	<u>   </u>	<u>   </u>	<u>   </u>	<u>   </u>

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<sup>2</sup> 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:

<u>IU Name</u>	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</u>
<u>n/a</u>	<u>   </u>	<u>   </u>	<u>   </u>

**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)] \*Size of city does not dictate a formal survey procedure. Simple word of mouth allows the Pretreatment Coordinator knowledge about new IUs plus he's given information from downtown on new connections as well as business water consumption. But, there has been no recent surveys sent out in some time.

     ✓ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> 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<sup>2</sup> activity and the distribution of P<sup>2</sup> 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:     None apparent    

YES NO

✓      Have any new SIUs been identified within the last 12 months? If yes:

<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>

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

- a.     2     SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b.     2\*    Categorical Industrial Users (CIUs) [WENDB-CIUS] \* Aero-Metal is zero discharge.
- c.     0     Noncategorical SIUs
- d.     0     Other regulated nonsignificant IUs (Describe) \_\_\_\_\_
- 2     TOTAL of a. + d.



**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

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

If not, the Control Authority has defined "significant industrial user" to mean:  
\*City's new Ordinance will have the current 40 CFR 403 definition.

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

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

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

What is the maximum term of the control mechanism? 5 years  
 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? 0 [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

IU NAME	PERMIT EXPIRATION DATE
N/A	

- Does the Control Authority accept trucked septage wastes?
- Does the Control Authority accept other trucked wastes?
- 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)]  
 n/a 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

- 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?

3/17/09 Date Notified Letter Method of Notification

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

<u>    </u> Federal Register	<input checked="" type="checkbox"/> Journals, Newsletters
<input checked="" type="checkbox"/> Meetings, Training	<input checked="" type="checkbox"/> Other <u>internet</u>
<input checked="" type="checkbox"/> Government Agencies	<u>    </u> Other <u>                    </u>

YES NO

      Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit or Annual Report?

If yes, complete the information below:

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

YES NO

     Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [WENDB-EVLL] [403.5(c) (1); 403.8(f) (4)]

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		11/05 Calc'd MAHL / MAHC (lb/d / ug/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>1.38 / 100</u>
Cadmium (Cd)	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>0.11 / 8.0</u>
Chromium-Total	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>13.8 / 1000</u>
Copper (Cu)	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>1.58 / 115</u>
Cyanide (CN)	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>0.33 / 24</u>
Lead (Pb)	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>0.34 / 24</u>
Mercury (Hg)	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>0.003 / 0.04</u>
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>2.76 / 200</u>
Nickel (Ni)	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>4.02 / 291</u>
Selenium (Se) *	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>0.2 / 14</u>
Silver (Ag)	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>0.08 / 6.0</u>
Zinc (Zn)	<input checked="" type="checkbox"/>	<u>    </u>	<u>    </u>	<input checked="" type="checkbox"/>	<u>    </u>	<input checked="" type="checkbox"/>	<u>4.14 / 300</u>

\* - 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:

<u>POLLUTANT</u>	<u>Headworks Analysis Completed?</u>		<u>Local Limits Needed?</u>		<u>Local Limits Adopted?</u>		<u>Numerical Limit Adopted (mg/l)</u>
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	
<u>n/a</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>

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, local limits were deemed not necessary.

TYPE OF ALLOCATION

	<u>Uniform Concentration</u>	<u>Mass</u>	<u>Hybrid</u>
	<u>Arsenic (As)</u>	<u>    </u>	<u>    </u>
<u>Cadmium (Cd)</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>Chromium-Total</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>Copper (Cu)</u>	<u>If local limits were necessary, the City</u>		
<u>Cyanide (CN)</u>	<u>would probably use the mass-based-on-</u>		
<u>Lead (Pb)</u>	<u>contributory-flow method.</u>		
<u>Mercury (Hg)</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>Molybdenum (Mo)</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>Nickel (Ni)</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>Selenium (Se)</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>Silver (Ag)</u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>Zinc (Zn)</u>	<u>    </u>	<u>    </u>	<u>    </u>

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?       
n/a

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
<u>Inspections:</u>			
<u>CIUs</u>	<u>1/yr</u>	<u>1/year</u>	<u>    </u>
<u>Other SIUs</u>	<u>"</u>	<u>1/year</u>	<u>    </u>
<u>Sampling:</u>			
<u>CIUs</u>	<u>1/yr</u>	<u>1/year</u>	<u>    </u>
<u>Other SIUs</u>	<u>"</u>	<u>1/year</u>	<u>    </u>
<u>Reporting:</u>			
<u>CIUs</u>	<u>2/yr</u>	<u>2/year</u>	<u>    </u>
<u>Other SIUs</u>	<u>"</u>	<u>2/year</u>	<u>    </u>
<u>Self-Monitoring:</u>			
<u>CIUs</u>	<u>2/yr</u>	<u>2/year</u>	<u>    </u>
<u>Other SIUs</u>	<u>"</u>	<u>2/year</u>	<u>    </u>

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

# % 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 and not sampled at least once in the past reporting year ?  
 [WENDB-NOIN]-[403.8(f)(2)(v)]

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected. *NONE*

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:

	<u>*Analytical Method</u>	<u>Name of Laboratory</u>
Metals	<u>ICP/MS</u>	<u>ANA Labs</u>
Cyanide	<u>Spectrophotometric</u>	<u>"</u>
Organics	<u>GC/MS</u>	<u>"</u>
Other	<u>WET</u>	<u>American Interplex</u>

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

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

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe:  
They rely on the state's certification program and require IUs to use those certified by ADEQ.

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

5days Conventionals  
5days Metals  
2 wks Organics

Is there an established protocol clearly detailing sampling location and procedures?

Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: \_\_\_\_\_

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO  
 \_\_\_ ✓

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: \_\_\_\_\_

✓ Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below.

I. ENFORCEMENT

YES NO

✓ \_\_\_ Is the Control Authority definition of SNC consistent with EPA's? [403.8(f) (2) (vii)]

✓ \_\_\_ 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)]

- |   |                                      |
|---|--------------------------------------|
| <u>✓</u> ___ Notice or letter of violation  | <u>✓</u> ___ Administrative Order    |
| <u>✓</u> ___ Setting of compliance schedule | ___ Revocation of permit             |
| <u>✓</u> ___ Injunctive relief              | <u>✓</u> ___ Fines (maximum amount): |

civil	\$ <u>1000</u> /day/violation
criminal	\$ <u>1000</u> /day/violation
administrative	\$ _____ /day/violation

- ✓ \_\_\_ Imprisonment
- ✓ \_\_\_ Termination of Service
- \_\_\_ Other: \_\_\_\_\_

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

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**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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		Return to Compliance?	
		Type	Date	Yes (Date)	No

n/a					

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

#	%	
<u>0</u>	<u>0</u>	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
<u>0</u>	<u>0</u>	Self-monitoring requirements [WENDB-MSNC]
<u>0</u>	<u>0</u>	Reporting requirements [WENDB-PSNC]
<u>0</u>	<u>0</u>	Pretreatment compliance schedule [WENDB-SSNC]
<u>0</u>	<u>0</u>	How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

YES NO

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

Has the Control Authority experienced any of the following:

- | <u>YES</u>                          | <u>NO</u>                           | <u>EXPLAIN and ID Industrial User</u>  |
|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Interference [WENDB]. _____  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Pass through [WENDB]. _____  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Fire or explosions? _____<br>(incl. flash point viol.)   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Corrosive structural damage? _____<br>(incl. pH <5.0).   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Flow obstructions? _____   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Excessive flow _____<br>or pollutant _____<br>concentrations? _____  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Heat problems? _____   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Interference due to _____<br>oil or grease? _____  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Toxic fumes? _____   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Illicit dumping of _____<br>hailed wastes? _____   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)] |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 0 How many SIUs are currently on compliance schedules?   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 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:

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	\$ _____
Administrative	<u>0</u>	\$ _____
Total	<u>0</u>	\$ _____ [WENDB-IUPN]

**J. DATA MANAGEMENT/PUBLIC PARTICIPATION**

- | <u>YES</u>                          | <u>NO</u>                |  |
|-------------------------------------|--------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Are inspection & sampling records well documented, organized and readily retrievable? Are files/records: |

- | <u>YES</u>                          | <u>NO</u>                |              |
|-------------------------------------|--------------------------|--------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | computerized |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | hard copy    |
| <input type="checkbox"/>            | <input type="checkbox"/> | OTHER: _____ |

Are the following files computerized:

- | <u>YES</u>                          | <u>NO</u>                           |                                  |
|-------------------------------------|-------------------------------------|----------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Control Mechanism Issuance       |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Inspection and Sampling schedule |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Monitoring Data                  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | IU Compliance Status Tracking    |
| <input type="checkbox"/>            | <input type="checkbox"/>            | Other: _____                     |

Can IU monitoring data can be retrieved by:

- |                          |                                     |                |
|--------------------------|-------------------------------------|----------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Industry name  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Pollutant type |

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

- YES     NO  
 \_\_\_\_\_ Industrial category or type  
 \_\_\_\_\_  SIC Code  
 \_\_\_\_\_  IU discharge volume  
 \_\_\_\_\_  Geographic location  
 n/a \_\_\_\_\_ 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?  
 ???  
 \_\_\_\_\_  
 \_\_\_\_\_
- \_\_\_\_\_ Are there significant public or community issues impacting the POTW's  
 pretreatment program?  
 If yes, please explain: Local limits may have to be implemented and  
enforced since Se and CN are now permit limits.
- \_\_\_\_\_ 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

< one-half of an FTE at this time

- 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:  
 \_\_\_\_\_  
 \_\_\_\_\_

	<u>Percent of Total Funding</u>
<input checked="" type="checkbox"/> POTW pretreatment line item now	95
<input checked="" type="checkbox"/> IU permit fees	5
_____ monitoring charges	_____
_____ industry surcharges	_____
_____ 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:  
 \_\_\_\_\_  
 \_\_\_\_\_



**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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

<u>YES</u>	<u>NO</u>		<u>If no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Legal assistance	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Permitting	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	IU inspections	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample collection	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample analyses	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data analysis, review and response	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enforcement	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Administration (inc. record keeping /data management)	_____

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>		<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	<u>2 auto samplers and 1 portable sampler &amp; pH meter</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	<u>Standard equipment</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	<u>Pick up truck</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	<u>Standard list for pH and conventionals</u>

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### L. POLLUTION PREVENTION

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.):  
None  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
2. Has the source of any toxic pollutants been identified?  
If yes, what was found?  
Not since last audit.  
\_\_\_\_\_  
\_\_\_\_\_
3. Has the POTW implemented any kind of public education program? If yes, describe:  
No  
\_\_\_\_\_  
\_\_\_\_\_
4. Does the POTW have any pollution prevention success stories for industrial users documented? Yes\*. If yes, please attach. \*City has an IU who has implemented many P2 practices, but no success stories have been compiled.
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? \_\_\_\_\_  
n/a  
\_\_\_\_\_  
\_\_\_\_\_

**SECTION III: INDUSTRIAL USER FILE REVIEW**

FILE #: 1 Industry Name Jan-Eze Plating File/ID No. NA003  
Industry Address 100 Mission Drive, 71852  
Industry Description Hard chrome and nickel plate small engine cylinders/pistons  
Industrial Category Metal Finishing 40 CFR 433.17 SIC/NAICS Codes: 3471/

Avg. Total Flow (gpd) ~25,000 Avg. Process Flow (gpd) ~21,000

Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name Aero Metal Inc. File/ID No. NA001  
Industry Address 600 South Mill Street, 71852  
Industry Description Mfg of scissors and shears from raw strip steel  
Industrial Category Metal Finishing 40 CFR 433.15 SIC/NAICS Codes: 3421/  
3312/3398

Avg. Total Flow (gpd) ~780\* Avg. Process Flow (gpd) 0 (everything hauled off-site)  
\*Avg over last 5 months from water billing.

Industry visited during audit: YES

Comments: Facility has very sporadic production at this time and is not discharging  
regulated wastewater to the City, but having it hauled off-site.

FILE #: 3 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:

FILE #: 4 Industry Name \_\_\_\_\_ File/ID No. \_\_\_\_\_  
Industry Address \_\_\_\_\_  
Industry Description \_\_\_\_\_  
Industrial Category \_\_\_\_\_ 40 CFR \_\_\_\_\_ SIC Code: \_\_\_\_\_  
Ave. Total Flow (gpd) \_\_\_\_\_ Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit: YES NO

Comments:

FILE #: 5 Industry Name \_\_\_\_\_ File/ID No. \_\_\_\_\_  
Industry Address \_\_\_\_\_  
Industry Description \_\_\_\_\_  
Industrial Category \_\_\_\_\_ 40 CFR \_\_\_\_\_ SIC Code: \_\_\_\_\_  
Ave. Total Flow (gpd) \_\_\_\_\_ Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit: YES NO

Comments:

## SECTION III: INDUSTRIAL USER FILE REVIEW

### A. Industrial User Characterization

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Is the IU considered "significant" by the Control Authority?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
2. Is the user subject to categorical pretreatment standards?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
a. New source or existing source (NS or ES)?	<u>NS</u>	<u>ES</u>	<u>      </u>	<u>      </u>	<u>      </u>
b. Is this IU one identified as having P <sup>2</sup> potential?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>

### B. Control Mechanism

1. Does the file contain an application for a control mechanism? (See Attch. A-1 for example)	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
If yes, what is the application date?	<u>4/11</u>	<u>1/12</u>	<u>      </u>	<u>      </u>	<u>      </u>
Does it ask for Pollution Prevention information?	<u>no</u>	<u>no</u>	<u>      </u>	<u>      </u>	<u>      </u>
2. Does the file contain a Permit? (See Attch. A-2 for example)	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
Permit Expiration Date?	<u>5/16</u>	<u>1/17</u>	<u>      </u>	<u>      </u>	<u>      </u>
Is a fact sheet included?	<u>3</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
3. Has the SIU been issued a control mechanism containing: [403.8(f) (1) (iii) (A) - (E)]					
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
d. Appropriate discharge limitations?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
e. Appropriate self-monitoring requirements?	<u>1</u>	<u>2 &amp; 4</u>	<u>      </u>	<u>      </u>	<u>      </u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>

Comments: 1) 2/yr for CFR 433 metals except for Cr & Ni (quarterly) & TTO states "once/5 year permit"; 2) Facility has been issued a "zero discharge" permit. The facility hauls all regulated w.w. (and sludge) off-site; 3) See Attch. A-3 for narrative "fact sheet"; 4) See Attch. A-4 for Aero-Metal's monthly reports.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Sampling locations?	<u>✓</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>2</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>timed no discharge</u>		<u>_____</u>	<u>_____</u>	<u>_____</u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Civil and Criminal Penalty provisions?	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Revocation of permit?	<u>1</u>	<u>1</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
l. Compliance schedules/ progress reports	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
m. General/Specific Prohibitions?	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
n. Where technologically and economically achievable, are P <sup>2</sup> aspect included?	<u>no</u>	<u>no</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>3</u>	<u>no discharge</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

Comments: 1) City uses the term "termination"; 2) City should require manifests in this facility's monthly reports along with their certification statement of "no discharge"; 3) Facility's permit still includes a TTO limit although they submitted a TOMP back in '95. Their permit also includes BOD and TSS limits which could be removed.

## SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
D. <u>Compliance Monitoring Sampling</u>					
1. Does the file contain Control Authority sampling results for the industry?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
3. Does the sampling report(s) include: [403.8(f) (2) (vi)]					
a. Name of sampling personnel?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
b. Sample date and time?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
c. Sample type?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
d. Wastewater flow at the time of sampling?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
e. Sample preservation procedures?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
f. Chain-of-custody records?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
g. Results for all parameters? SIUs & CIUs [403.12(g) (1) - CIUs]	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>1</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>timed</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
6. Were 40 CFR 136 analytical methods used? [403.8(f) (2) (vi) <u>Inspections (see Attch. A-5 for example)</u>	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
b. Date of last Inspection	<u>7/11</u>	<u>10/11</u>	<u>      </u>	<u>      </u>	<u>      </u>
9. Does the inspection report(s) include: [403.8 (f) (2) (vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
d. Verification of production rates?	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>2</u>	<u>2</u>	<u>      </u>	<u>      </u>	<u>      </u>
f. Evaluation of pretreatment facilities?	<u>2</u>	<u>3</u>	<u>      </u>	<u>      </u>	<u>      </u>
g. Evaluation of self-monitoring equipment and techniques?	<u>no</u>	<u>no</u>	<u>      </u>	<u>      </u>	<u>      </u>

Comments: 1) Jan-Eze submitted a TOMP back in '95, but the City still requires a TTO analysis once per 5 yrs. The City is not verifying compliance by conducting their own toxic organic analysis. The TTO limit should be footnoted by stating the facility has submitted an approved TOMP and is certifying with the proper TTO cert. statement; 2) Vague; 3) Facility no longer has any pretreatment since they're shipping all w.w. off-site.

### SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
h. Evaluation of slug (see Attch. A-6 for example although not complete) discharge control plan & need to develop? [403.8(f) (2) (v)]	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
i. Manufacturing facilities?	<u>1</u>	<u>1</u>	<u>      </u>	<u>      </u>	<u>      </u>
j. Chemical handling and storage procedures?	<u>3</u>	<u>3</u>	<u>      </u>	<u>      </u>	<u>      </u>
k. Chemical spill prevention areas?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
l. Hazardous waste storage areas and handling procedures?	<u>1 &amp; 3</u>	<u>1 &amp; 3</u>	<u>      </u>	<u>      </u>	<u>      </u>
m. Sampling procedures?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
n. Laboratory procedures?	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
o. Monitoring records?	<u>4</u>	<u>4</u>	<u>      </u>	<u>      </u>	<u>      </u>
p. Evaluation of Pollution Prevention opportunities?	<u>5</u>	<u>5</u>	<u>      </u>	<u>      </u>	<u>      </u>
q. Control Authority inspector signature?	<u>2</u>	<u>2</u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>IU Self-Monitoring and Reporting</u>					
10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
11. Does the file include:					
a. BMR?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
b. 90-Day Report?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
c. All periodic reports?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
12. Did the IU report on all required parameters?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>

Comments: 1) Very general/vague in nature; 2) Suggest having facility rep's signature on the inspection reports also; 3) Chemical storage descriptions are adequate, but there's nothing mentioned about chemical handling procedures; 4) Nothing noted in inspections about the facilities own monitoring records which have to be kept on-site for a minimum of 3 years; 5) P2 questions are asked, but they're not all answered, or not answered correctly for Jan-Eze (see Attch. A-5h).



**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>✓</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
14. Did the IU report flow?	<u>✓</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>n/n</u>	<u>n/n</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>no</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
b. Did POTW respond to the spill?	<u>--</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

**E. Enforcement**

1. Were all IU discharge violations identified in: [403.8(f) (2) (vi)]					
a. Control Authority monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
b. IU self-monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>✓</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>      </u>	<u>      </u>	<u>      </u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/n</u>	<u>n/n</u>	<u>      </u>	<u>      </u>	<u>      </u>
8. Did the Control Authority follow its approved ERP?	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>n/a</u>	<u>n/a</u>	<u>      </u>	<u>      </u>	<u>      </u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>no</u>	<u>      </u>	<u>      </u>	<u>      </u>
11. Were there any compliance schedule violations?	<u>-</u>	<u>-</u>	<u>      </u>	<u>      </u>	<u>      </u>
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>✓</u>	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
b. TRC	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
c. Pass through/Interference	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
d. Spill/slug loads	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
e. Reporting	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
f. Compliance schedule	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
g. others (specify)	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
13. Was the SIU published for SNC?	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Date of publication.	<u>-</u>	<u>-</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

# REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Nashville NPDES #: AR0021766

Date of Audit: 2/22 - 2/24/12 Date entered into ICIS: 3/5/12  
(P2 ASSESSMENT)

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

### SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

Control Authority: City of Nashville NPDES #: AR0021766

Name, address and phone number of industry:  
Jan-Eze, 100 Mission Drive, 870.845.5134

Type of industry: Metal Finisher      Date/Time of visit:  
CFR 433.17      2/23/12 / 10:10 a.m.

Industry contacts: John Anderson-Env/Safety Eng. & Larry  
Frohnappel - Plant Manager

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

\*IU has implemented numerous P2 practices.

Additional comments: Facility has not changed its operations or pretreatment since the '09 audit. IU plates both aluminum and steel products for outside customers such as nickel and/or chrome plating on small engine aluminum pistons and cylinders as well as large equipment parts. Their numerous P2 practices on the plating lines include counter-flow cascade rinses; mist eliminator/mesh pad scrubbers washed down over the chrome lines; dead rinses are returned to a vacuum distillation system (Controlled Atmospheric Separation Technology [CAST]) for recovery and re-use in chrome plating and water in their rinses. Since installation of the CAST unit they're down to 72 bags from 330 bags (cubic yards)/yr to haul off as haz. waste.

Visit conducted by: Gilliam/Carlyle Date: 2/23/12

*Allen Gilliam*

(signature of auditor conducting visit)

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

Control Authority: City of Nashville NPDES #: AR0021776

Industry name: Jan-Eze

Additional comments: Both ion exchange and mechanical filtration of plating solutions are utilized to extend the life of the solutions. IU has a sulfuric acid strip tank for defective chrome plating. Their parts washer (soap) removes oil from the cylinder (spinning) honing process. This oil is separated by a "barrel" oil skimming device and re-used or if spent, hauled off-site. Once the parts washer w.w. is oil free, it is sent to the City. Small engine cylinders are hard chrome plated. They nickel plate the pistons. Surface prep. includes various soaps and acid submersions then rinsed. All plating/rinse stations are surrounded by a ~4" concrete containment curb and grated floor trough. All rinse waters are directed to a 3,000 gallon rinse tank or a wastewater pit under their pretreatment system which is pumped back into the 3,000 gal. rinse tank. Spent concentrates are directed to either the acid/alkaline tank or the Cr concentrate tank. Pretreatment includes chrome reduction from hex- to tri- using sodium bisulfite; sodium hydroxide and aluminum sulfate used for chemical precipitation of metals; polymers are added to aid in the clarifiers' flocculation process; pH neutralization; supernatant is gravity fed through sand filters before discharge to the City. Sludge is sent to a sludge holding tank, filter pressed, then dried in a small cylindrical/sloped "oven" to reduce the volume to be disposed of off-site. This entire process can be continuous or batch treated. IU rep(s) were very familiar with the regs. The City rep was familiar with the IU's processes and pretreatment. Adequate/lockable sampling site. The IU is considering eliminating Chrome plating altogether and just conducting a new Nickel plating system. IU rep. indicated this might begin on a small scale in the next couple of month or so.

Visit conducted by: Gilliam/Carlyle Date: 2/23/12



(signature of auditor conducting visit)

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

Control Authority: City of Nashville NPDES #: AR0021776  
Industry name: Aero-Metal Inc.

Additional comments: When completely spent, the floor "tanks" are sump pumped to a 2,000 gallon holding tank. Contents are hauled off-site when close to being full. Hand and mechanized grinding/machining is conducted to ready the workpieces for plating. The Nickel plating line consists of ~16 tanks of various volumes which include a caustic cleaning; city water rinse; sulfuric acid bath; 3 water rinses; sulfuric/hydrochloric acid bath; 4 water rinses; then the "knife" forms are either bright or gray ("dull") Ni plated and rinsed. The hard chrome plating line consists of ~10 tanks which include an electrocleaner (soap) baths; water rinse; acid salt bath; water rinse; chrome plate; 3 water rinses followed by a hot water rinse. There was also two acid stripper tanks for rejects and racks. "Drip pans" surrounded the plating line and an absorbent pad was in place on the floor to capture any splashes or spills. Discussions with IU rep indicated very little P2 was being practiced. All wastewater generated is sump pumped into storage tanks and periodically hauled off-site for disposal. The facility had greatly improved the interior's cleanliness, lighting, painting and keeping floors swept. The city has issued the facility a "no-discharge" permit requiring the IU to certify monthly that no regulated wastewater had been discharged. The IU was also including their manifests of hauled waste, including sludge with each monthly report. The City periodically places a composite sampler in a manhole just downstream of the facility.

Visit conducted by: Gilliam/Carlyle Date: 2/24/12



(signature of auditor conducting visit)

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

Control Authority: City of Nashville NPDES #: AR0021766  
 Name, address and phone number of industry:  
Aero Metal Inc., 600 South Mill Street, 870.845.4075  
NO DISCHARGE FACILITY. ALL WASTEWATER & SLUDGE HAULED OFF-SITE  
 Type of industry: \_\_\_\_\_ Date/Time of visit:  
Metal Finisher CFR 433.15 2/24/12 / 8:45 a.m.

Industry contacts: Tim McNulty - President, James Smith & Howard Stuart - Plating Operator

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

Additional comments: Facility Ni/Cr plates scissors, shears and specialty combination cutters/wire strippers. Some of the hand tools have a rubber coating on the handles. Hot rolled steel "strips" are brought in to be "red-hot" heated and forged in the basic scissor/shear forms. The work pieces are "salt pot" (~1,650 F) heat treated and quenched in an oil bath. Further shearing machines remove the bulk of the excess metal surrounding the handled-"knife" forms. 5 vibratory tumblers further remove the rough burrs on the workpieces. Fluids from the tumblers are serpentine circulated through small floor "tanks" and re-used as much as possible.

Visit conducted by: Gilliam/Carlyle Date: 2/24/12



(signature of auditor conducting visit)





Attachment A-1

# NASHVILLE PUBLIC WORKS

426 NORTH MAIN, NASHVILLE, AR 71852  
PH (870) 845-4015 - FAX (870) 845-7409

## APPLICATION TO DISCHARGE INDUSTRIAL WASTEWATER TO A PUBLICLY – OWNED TREATMENT WORKS (POTW)

This application is for a wastewater discharge permit for a discharge of industrial wastewater to a publicly – owned treatment works (POTW) as required by ADEQ. It is designed to provide ADEQ and the City of Nashville with information on pollutants in the waste streams, materials that may enter the waste stream, and the flow characteristics of the discharge. The City of Nashville may request additional information to clarify the conditions of this discharge.

### SECTION A. GENERAL INFORMATION

1. Applicant name: Larry Frohnappel

2. Facility name: Jan-Eze Plating

3. Applicant Address: 100 Mission Road  
Street

Nashville, AR 71852  
City/State Zip

4. Contact Person:

John Anderson

Environmental/Safety Manager

Name

Title

870-845-5134

870-845-5168

janderson@janezeplating.com

Telephone Number

Fax Number

E-Mail

For Office Use Only

Check One: New/Renewal  Modification

Date Application  
Received           

Date Fee  
Paid           

Application  
Permit No.           

Date Application  
Accepted

Is this document for a Permit Renewal Yes

Does this application request a greater amount of wastewater discharge, a greater amount of pollutant discharge, or a discharge of different pollutants than specified in the last permit application for this facility?  Yes  No

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 a fine and/or imprisonment for knowing violations.

Janey Schaefer                      4-25-11                      CEO  
Signature\*                                      Date                                      Title

\* Applications must be signed as follows: corporations, by a principal executive officer of at least the level of vice-president; by a general partner; sole proprietorship, by the proprietor. If these rules do not apply within your organization, the application is to be signed by the person who makes budget decisions for this facility.

**SECTION B. PRODUCT INFORMATION**

1. Briefly describe all manufacturing processes and products, and/or commercial activities, at this facility. Provide the applicable Standard Industrial Classification (SIC) Code(s) for each activity, the city can provide you with these codes if needed.

Description: Jan-Eze Plating applies a hard chromium plated finish  
to small engine cylinders and several varieties of steel parts.

Jan-Eze Plating also applies electrolytic nickel finish to  
small engine pistons. (SIC) 332813

2. List raw material and products used at this facility:

Type	RAW MATERIALS	Quantity
3/11	Chromium	1750 lbs monthly Aug.
	Nitric Acid	2832 gals monthly Aug.
	Sulfuric Acid	11,429 lbs monthly Aug.
	Nickel Sulfate	40 gals monthly Aug.
	Sodium Hydroxide	59,125 lbs monthly Aug.
	Sodium Bisulfite, Dry	232 lbs monthly Aug.
	Sodium Bisulfite, Liquid	165 gals monthly Aug.
	Aluminum Sulfate	1950 lbs monthly Aug.

**SECTION C. PLANT OPERATIONAL CHARACTERISTICS**

1. For each process listed in B.1. generating wastewater, list the process, assign the waste stream a name and an ID# and describe whether it is a batch or continuous flow.

Process	Waste Stream Name	Waste Stream ID#	Batch (B) or Continuous (C) Flow
Hard Chromium	Chrome	NA003	Batch & Continuous
Electrolytic Nickel	Nickel	NA003	Batch & Continuous

A-1c

On separate sheet produce a schematic drawing showing production processes, water flow through the facility, wastewater treatment devices and waste streams as named above. The drawing should indicate the source of intake water and show the operations contributing wastewater to the effluent. The treatment units should be labeled.

see Attachment A

3. What is the maximum daily discharge flow? 21,000 gallons/day

What is the maximum average monthly discharge flow (daily flows averaged over a month) \_\_\_\_\_ gallons/day

9 month avg. for #5140 is 335,000 gals.  
 9 month avg. for #5130 is 24,000 gals.  
 a month

4. Describe any planned wastewater treatment improvements or changes in wastewater disposal methods, and the schedule for these improvements.

Jan-Eze has installed a chrome recycling system which allows them to recover chrome, resulting in less chrome being processed in waste treatment, and the reuse of water in a rinse tank.

Jan-Eze made changes in the cylinder line hoist processor to shake twice over the Alkalume, resulting in less zinc going to waste treatment.

Jan-Eze installed a 24 hour flow recorder on the effluent side.

5. If production processes are subject to seasonal variations, provide the following information List discharge for each waste stream in gallons per day (GPD).

Waste Stream ID#	Months											
	jan	feb	mar	apr	may	jun	jul	aug	sept	oct	nov	dec
NA003	Jan.	353,000	Feb.	325,000	Mar.	333,000	Apr.	453,000				
	May	441,000	Jun.	431,000	Jul.	356,000	Aug.	401,000				
	Sept.	317,000	Oct.	276,000	Nov.	317,000	Dec.	353,000				

See Attachment B

Estimated Total Monthly Flow (GPD)

A-1d

6. How many hours a day does this facility typically operate? 24 hours  
How many days a week does this facility typically operate? 5 days  
How many weeks per year does this facility typically operate? 51 weeks

7. List all incidental materials, such as oil, paint, grease, solvents, and cleaners that are used or stored on site ( list only those with quantities greater than ten (10) gallons for liquids and 50 pounds for solids) Include a copy of any Material Data Sheets and estimate the quantity used.

Materials/Quantity Stored: Uniclean Soak HS / 500#  
Mechanical Cleaner #1 / 75 gals or 50#  
Hocut 795 / 55 gal.  
S-2250 Honing Oil / 440 gals.  
Super 425 / 440 gals.  
Alkleen 77 / 500#  
See Attachment C

8. Some types of facilities are required to have spill or waste control plans. Does this facility have the following:

- a. A Spill Prevention, Control Plan (40 CFR 112)?  x  Yes   No  
b. A Emergency Response Plan?  x  Yes   No  
c. A Slug Discharge Control Plan? (40 CFR 403.8(f)(2)(v))?  x  Yes   No  
d. A runoff, spillage, or leak control Plan?  x  Yes   No

**SECTION D. WATER CONSUMPTION AND WATER LOSS**

**1. Water source(s):**

**Public system (specify)** Public works of Nashville

**Private Well**     **Surface Water**

**a. Water permit number:** ACCT: 06-5140-00 , 06-5130-00

**2. Water use:**

**a. Indicate total water use:**    **Gallons per day (average)**    18,000

**Gallons per day (maximum)**    21,000

**b. Is water metered?**     **Yes**     **No**

**SECTION E. WASTERWATER INFORMATION**

**1. How are the water intake and effluent flows measured?**

**Intake:** water meters ACCT: 06-5140-00 , 06-5130-00

**Effluent:** flow meter measures the effluent & records  
Discharge permit also has gals. used monthly

**2. Provide measurements or range of measurements for treated wastewater prior to discharge to the POTW for the parameters with an "X" in the left column. Use the analytical methods given by your laboratory, unless an alternate is approved by ADEQ or the City of Nashville. Provide data from last year if this is a permit renewal.**

*A-1f*

Parameter	Concentration Measured			Analytical Method Std Methods 19 <sup>th</sup>	Detection Limit
	Minimum	Maximum	Average		
BOD(5 day)				5210	2 mg/L
COD				5220 B,C, or D	5 mg/L
X Total Suspended Solids	-----	16 mg/L		2540 D	1 mg/L
Total Dissolved Solids				2540 C	
Conductivity				2510 B	
Ammonia-N				4500-NH3C	20 ug/L
X pH	-----	9.0		4500-H	0.1 units
Total Residual Chlorine				4500-Cl E	1 mg/L
Fecal Coliform				9222-D	
Total Coliform				9221 B or 9222 B	
Dissolved Oxygen				4500-O C or 4500-O G	
Nitrate + Nitrate-N				4500-Norg	0.5 ug/L
Total Kjeldahl N				4500-P E or 4500-P F	20 ug/L
Ortho-phosphate-P				4500-P E or 4500-P F	1 ug/L
Total-phosphate-P				4500-P B.4.	1 ug/L
X Total Oil and Grease	-----	2.8 mg/L		5520 C	0.2 mg/L
Calcium				3500-Ca B	3 ug/L
Chloride				4500 Cl C	0.15 ug/L
Fluoride				4500 F D	0.1 ug/L
Magnesium				3500 Mg B	0.5 ug/L
Potassium				3500 K B	5 ug/L
Sodium				3500 Na B	2 ug/L
Sulfate				4500-SO4E	1 mg/L
Arsenic-T				3114 B	2 ug/L
Barium-T				3500 Ba B	30 ug/L
X Cadmium-T	-----	< .100ug/L		3500 Cd B	5 ug/L
X Chromium-T	-----	193ug/L		3500 Cr B	50 ug/L
X Copper-T	-----	177ug/L		3500 Cu B	20 ug/L
X Lead-T	-----	1.82ug/L		3500 Pb B	100 ug/L
Mercury				3500 Hg B	0.2 ug/L
Molybdenum-T				3500 Mo	1 ug/L
X Nickel-T	-----	1800ug/L		3500 Ni	20 ug/L
Selenium-T				3500 Se C	2 ug/L
X Silver-T	-----	< 0.005 mg/L		3500 Ag B	10 ug/L
X Zinc-T	-----	928ug/L		3500 Zn B	5 ug/L

A-12





## VOLATILE COMPOUNDS

Acrolein	1,2,- Dichloropropane
Acylonitrile	1,3 – Dichloropropene
Benzene	Ethyhlbensene --- x
Bis (choromethyl) Ether	Methyl Bromide
Bromoform	Methyl Chloride
Carbon Tetrachloride	Methylene Chloride
Chlorobenzene	1,1,2,2 Tetrachloroethane
Chlorodibromomethane	Tetrachloroethylene
Chloroethane	Toluene ---- x
2 Chloroethylvinyl Ether	1,2 Trans-Dichloroethylene
Chloroform --- x	2,1,1,1, Trichloroethane
Dichlorobromomethane	2,1,1,2 Trichloroethane
Dichlorodifluoromethane	2 Trichloroethylene
1,1 Dichloroethane	Trichlorofluoromethane
1,2 Dichloroehtane	1,1 Dichloroethylene
Vinyl Chloride	

## ACID COMPOUNDS

2 Chlorophenol	4 Nitrophenol --- x
2,4 Dichlorophenol	p Chloro-M-cresol
2,4 Dimethylphenol	Pentachlorophenol
4,6 Dinitro-o-cresol	Phenol --- x
2,4 Dinitrophenol	2,4,6 Trichlorophenol ---x
2 Nitrophenol	

## METALS

Antimony	Mercury
Arsenic	Nickel --- x
Beryllium	Selenium
Cadmium --- x	Silver ---- x
Chromium -- x	Thallium
Copper ---- x	Zinc ----- x
Lead ---- x	Cyanide

A/i

## PESTICIDES

Aldrin  
 alpha - BHC  
 beta BHC  
 gamma BHC  
 delta BHC  
 Chlordane  
 4,4 DDD  
 4,4 DDE  
 4,4 DDT  
 Dieldrin

Endosulfan I  
 Endosulfan II  
 Endosulfan Sulfate  
 Endrin  
 Endrin Aldehyde  
 Heptachlor  
 Heptachlor Epoxide  
 PCB  
 Toxaphene

## BASE/NEUTRAL COMPOUNDS

Acenaphthene  
 Acenaphthylene  
 Anthracene  
 Benzidine  
 Benzo(a)anthracene  
 Benzo(a)pyrene  
 3,4 Benzofluoranthene  
 Benzo(ghi)Perylene  
 Benzo(k)Fluoranthene  
 Bis(2-chloroethoxy) Methane  
 Bis(2-chloroethyl) Ether  
 Bis(2-chloroisopropyl) Ether  
 Bis(2-ethylhexyl) Phthalate  
 4- Bromophenyl Phenyl Ether  
 Butyl Benzyl Phthalate  
 2-Chloronaphthalene  
 4-Chlorophenyl Phenyl Ether  
 Chrysene  
 Dibenzo(a,h) anthracene  
 1,2 Dichlorobenzene  
 1,3 Dichlorobenzene  
 1,4 Dichlorobenzene  
 3,3 Dichlorobenzidine

Diethyl Phthalate  
 Dimethyl Phthalate  
 Di-n-butyl Phthalate --- X  
 2,4 Dinitrotoluene  
 2,6 Dinitrotoluene  
 Di-n-octyl Phthalate  
 1,2 Diphenylhydrazine  
 Fluoranthene  
 Fluorene  
 Hexachlorobenzene  
 Hexachlorobutadiene  
 Hexachlorocyclopentadiene  
 Hexachloroethane  
 Indeno  
 Isophorone  
 Naphthalene  
 Nitrobenzene \ ---- X  
 N-nitrosodimethylamine  
 N-nitrosodi-n-propylamine  
 N-nitrosodiphenylamine  
 Phenanthrene  
 Pyrene  
 1,2,4 Trichlorobenzene

6. Are any pesticides, herbicides, or fungicides used at this facility?  yes  no  
If yes, specify the material and quantity used:

NA

7. Are there other pollutants that you know of or believe to be present?  yes  no  
If yes, specify the pollutants and their concentration, if known:

NA

**SECTION F. SEWER INFORMATION**

1. Is an inspection and sampling manhole or similar structure available on site?  yes  no  
If yes, attach a map or hand drawing of the facility that shows the location of these structures. Label attachment F.1

**SECTION G. OTHER PERMITS**

1. List all environmental control permits or approvals needed for this facility; for example , air emission permits.

air emission permit #1937-AR-3 stormwater permit #ARR000000

discharge permit #NA003

boiler permits state number 89697; AR 69612; AR92067

A-1K

SECTION H. STORMWATER

1. Does your facility discharge stormwater: No

- To a storm sewer system
- Directly to any surface waters such as a river, lake, creek
- Indirectly to surface waters, others properties.

2. Does your facility have a stormwater permit?  yes  no

If yes, what is your permit number: ARR000000

SECTION I. OTHER INFORMATION

1. Describe liquid wastes or sludges being generated by your facility that are not disposed of in the waste stream(s) and how they are being disposed of. For each type of waste, provide type of waste and name, address, and phone number of the hauler.

Honing oil with chrome, metal hydroxides, spent sand filter sand,  
chrome contaminated debis, honing oil with stone, plating tank bottoms.

NEXEO 5200 Blazer Parkway Dublin, OH 43017 phone (866-436-2649)

UNIVAR 1925 Redmond Road Jacksonville, AR 72076-2301

Phone (501-982-4402)

2. Describe storage areas for raw materials, products, and wastes.

Two chemical storage rooms holds nitric acid, sulfuric acid, alkleen 77,  
warehouse holds sodium bisulfite and heef 25 RS1, warehouse holds all  
waste streams.

A-12

SECTION J. CERTIFICATIONS

1. Approval by Public-Owned Treatment Works

I approve of the discharge as described in this application: The applicant is:

- A Significant Industrial User
- A Categorical Industrial User
- Neither of the above

Treatment Plant/Sewer System Authority

Name: ED CARLYLE JR

Street: 426 NORTH MAIN

City/State: NASHVILLE AR 71852

Larry Donaway                      4-25-11  
Signature of Public Works Director      Date

Larry Donaway  
Printed Name

A-1.m

1. Fees for industrial user wastewater discharge permits.
2. Actual cost for monitoring, sampling, inspection, laboratory analysis and surveillance procedures in instances of willful or negligent violations.
3. Actual cost for cleanup and/or correcting POTW problems caused by violations and costs incurred by POTW damage to facilities and/or legal liabilities resulting from such violations.
4. Other fees as the City and the Director may deem necessary to carry out the requirements contained herein.
5. Surcharges for excessive strength discharges.
6. Fees for filing appeals.

CITY OF NASHVILLE  
NASHVILLE PUBLIC WORKS  
426 NORTH MAIN  
NASHVILLE, AR 71852

On this date, May 4, 2011, Jan-Eze Plating of 100 Mission Drive, Nashville, Arkansas, was hand delivered the attached Wastewater Discharge Permit (NA003).

Name of Company Representative receiving document:

John Belle

Environmental Safety Manager  
Title

5/04/11  
Date

Name of City Representative delivering document:

ED CARLYLE, JR.

PRETREATMENT COORD.  
Title:

5-4-11  
Date:

cc: Jan-Eze Plating Pretreatment file

A-12

*Attachment A-2*

**CITY OF NASHVILLE**  
426 NORTH MAIN  
NASHVILLE, AR 71852

**INDUSTRIAL WASTEWATER DISCHARGE PERMIT**

**NUMBER NA003**

**In accordance with the provisions of the City of Nashville Sewer Use Ordinance No. 639, Nashville Municipal Code, Title 10, Water and Sewer, Chapter 10.12,**

**JAN-EZE PLATING  
100 MISSION DRIVE  
NASHVILLE, AR 71852**

is hereby authorized as a discharging industrial wastewater from the above identified facility. As such, it may discharge any wastewater associated with any industrial processes through the outfalls identified herein into the City of Nashville sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permitted of its obligations to comply with any or all applicable pretreatment regulations, standards, or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Non-compliance with any term or condition of this permit shall constitute a violation of the City of Nashville Sewer Use Ordinance 639 of 1993.

This permit shall become effective May 4, 2011 and shall expire at midnight on May 3, 2016.

If the permitted wishes to continue to be permitted after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements set forth in the City of Nashville Sewer Use Ordinance No. 639 of 1993, Section IV, 10.12.20, a minimum of ninety (90) days prior to the expiration date.

This permit shall not be re-assigned or transferred, or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the Public Works Director.

By *Larry Dunaway*  
Larry Dunaway  
Public Works Director

*Ed Carlyle, Jr.*  
Ed Carlyle, Jr.  
Pretreatment Coordinator

Issued this 4<sup>th</sup> day of May, 2011.

**PART 1 – EFFLUENT LIMITATIONS**

**A. During the period of May 4, 2011 and May 3, 2016 the permitted is only authorized to discharge wastewater from the outfall listed below**

**Outfall NAO03 Description of Outfall**

Wastewater discharge sampling to meet compliance with 40 CFR 433.17 PSNS shall be collected from a sampling point marked by a permit discharge number, NA003, painted in bright orange paint above the discharge line located below the settling tank and at the end of the shut off valve.

**B. During the period of May 4<sup>th</sup>, 2011 and May 3, 2016 the discharge from outfall NA003 shall not exceed the following effluent limitations. Effluent from this outfall shall consist of only process wastewater generated from the metal plating operations.**

Parameter	CFR Daily	CFR Monthly	Daily CWF	Monthly CWF	Local Daily Limit	Final Daily Limit	Final Monthly Limit
Flow	N/A	N/A	N/A	N/A	N/A	Report 1	N/A
pH	N/A	N/A	N/A	N/A	see note below	see note below	N/A
BOD5	N/A	N/A	N/A	N/A	250 **	250 **	N/A
TSS	N/A	N/A	N/A	N/A	250 **	250 **	N/A
Cadmium	0.11	0.07	N/A	N/A	N/A	0.11	0.07
Chromium	2.77	1.71	N/A	N/A	N/A	2.77	1.71
Copper	3.38	2.07	N/A	N/A	N/A	3.38	2.07
Cyanide	1.20	0.65	N/A	N/A	N/A	1.20	0.65
Lead	0.69	0.43	N/A	N/A	N/A	0.69	0.43
Nickel	3.98	2.38	N/A	N/A	N/A	3.98	2.38
Silver	0.43	0.24	N/A	N/A	N/A	0.43	0.24
Zinc	2.61	1.48	N/A	N/A	N/A	2.61	1.48



TTO	2.13	N/A	N/A	N/A	N/A	N/A	2.13
-----	------	-----	-----	-----	-----	-----	------

Oil and Grease	N/A	N/A	N/A	N/A	100	100	N/A
----------------	-----	-----	-----	-----	-----	-----	-----

\* all concentrations are in mg/L unless otherwise noted

- 1 Please complete and submit a discharge flow report for each self-monitoring event performed. A copy of the discharge flow report is attached at the end of this permit.
  - 2 Any wastewater having a pH less than 5.0 standards units or having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the City of Nashville is a direct violation of this permit.
- \*\* the 250 mg/L limit for BOD5 and TSS are expressed as a surcharge limit. Surcharging for excessive BOD and TSS loadings shall be in accordance with City Ordinance 640 of 1993.

**PART 2 – WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS FOR EXISTING USER**

A. From the period beginning on the effective date of the permit until May 3, 2016 the permitted shall monitor outfall NA003 for the following parameters, at the indicated frequency.

Sample Parameter	Discharge Limitations		Monitoring Requirements	
	Maximum Monthly Avg mg/L	Daily Maximum mg/L	Sample Frequency time proportional	Sample Type
Flow	see prohibited regulations		weekly	metered
pH		5.0 – 10.0	daily	grab
Cadmium	0.07	0.11	twice/year	24 hour comp
Chromium	1.71	2.77	once/quarter	24 hour comp
Copper	2.07	3.38	twice/year	24 hour comp
Lead	0.43	0.69	twice/year	24 hour comp
Nickel	2.38	3.98	once/quarter	24 hour comp
Silver	0.24	0.43	twice/year	24 hour comp
Zinc	1.48	2.61	twice/year	24 hour comp
Cyanide	0.65	1.20	twice/year	grab
TTO		2.13	once/5 year permit	24 hour comp
BOD5		250	twice/year	24 hour comp
TSS		250	twice/year	24 hour comp
OIL/Grease		100	twice/year	grab

1. The permitted is required to test and sample for all TTO compounds listed under 40 CFR 433.11(e)
  2. Time composite sampling shall be based on hours of operation(e.g. 4, 6, 8, 12, 16)
  3. Waste stream NA003 is considered a continuous discharge to the sanitary sewer system.
- B. All handling and preservations of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR 136 regulations and amendments thereto unless specified otherwise in the monitoring conditions of this permit.

<b>PART 3 - GENERAL DISCHARGE PROHIBITIONS</b>
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- A. The permitted shall not discharge wastewater containing any of the following substances from any outfall, unless authorized by the Director of Public Works:
1. No industrial 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 industrial users of the POTW whether or not they are subject to categorical pretreatment standards or requirements. Furthermore, no industrial user may contribute the following pollutants, substances, or wastewater to the POTW:
- B. Specific Pollutants
- a. Pollutants which create a fire or explosive hazard in the municipal wastewater collection and POTW, including but not limited to waste-streams with closed-cup flashpoint of less than 140.F (60.0C) using the test methods specified in 40 CFR 261.21.
  - b. Wastewater having a pH less than 5.0 or more than 11.0, or otherwise causing corrosive structural damage to the POTW or equipment;
  - c. Solid or viscous substances which may cause obstruction o the flow in a sewer or other interference with the operation of the wastewater treatment facilities such as, but not limited to:  
  
Grease, garbage with particles greater than one-half inch (1/2") in any dimension, animal guts or tissues, paunch, manure, bones, hair, hides or flashings, entrails, whole blood, feathers, ashes, cinders, sand, spent lime, stone or marble dust, metal, glass, straw, shaving, grass clippings, rags, spent grains, spent hops, chemical residues, paint residues, septic tank solids, residues from oil, mud, glass grinding or polishing wastes, petroleum oil, non-bio-gradable cutting oil or products of mineral oil.
  - d. 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;

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- e. Any wastewater containing toxic pollutants in sufficient quantity, either singly or by interaction with other pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of the POTW, or to exceed the limitation set fourth in a categorical pretreatment standard. A toxic pollutant shall include but not be limited to any pollutant identified pursuant to Section 307 (a) of the Act.**
- f. Any noxious or malodorous liquids, gases, or solids which either singly or interaction with other wastes are sufficient to create a public nuisance or hazard to life or sufficient to prevent entry into the sewers for maintenance and repair.**
- g. Any substance which may cause the POTW's effluent or any other product of the POTW such as residues, sludge's, or scum's to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged into the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines or regulations developed under Section 405 of the ACT, or with any criteria, guidelines or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substance Control Act or State criteria applicable to the sludge management method being used.**
- h. Any substance which will cause the POTW to violate its NPDES and/or State "Discharge" system permit or the receiving water quality standards.**
- i. Any wastewater with objectionable color not removed in 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 POTW's NPDES permit;**
- j. Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in interference, but in no case wastewater with a temperature at the introduction into the POTW, which exceeds 65 C (150F), or in such quantities that the temperature at the treatment plant exceeds 40.0 C (140 F);**
- k. Any wastewater which causes a hazard to human life or creates a public nuisance;**
- l. Wastewater containing any radioactive wastes or isotopes except in compliance with applicable Federal or State regulations and approved by the Control Authority;**
- m. Any wastewater which may contain strong acid, iron pickling wastes or concentrated plating solutions whether neutralized or not;**
- n. Trucked or hauled pollutants, except at discharge points designated by the Control Authority;**
- o The City Code Enforcement Inspector is entitled to review and approve the installation and operation of any garbage grinder equipped with a motor greater than three-fourths (3/4) horse power (0.76 HP metric) except for residential installations;**
- p. No user shall discharge into the public sewer system any storm water, surface water, ground water, roof runoff, subsurface drainage, artesian well water, condensate, de-ionized water, non-**

contact cooling water or unpolluted water;

q. No user shall discharge into the public sewer system any petroleum oil, non-bio-gradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass-through and a prohibition of any trucked or hauled pollutants, except at discharge points designated by the POTW.

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

s. Any material into a manhole through its top unless specifically authorized by the Control Authority;

t. Any other substance, material, water, or waste, if it appears likely in the opinion of the Public Works Director that such wastes can harm either the sewers, sewage treatment process, or equipment, have an adverse effect on the receiving stream, or can otherwise endanger life, limb, public property, or constitute a nuisance.

**C. Dilution of discharges prohibited**

No user shall ever increase the use of process water or, in anyway, attempt to dilute a discharge as partial or complete substitute for adequate treatment to achieve compliance with the limitation contained in the Federal Categorical Pretreatment Standards, or in any other pollutants specific limitation developed by the City or State. The permitted shall comply with all other applicable laws, regulations, standards, and requirements contained in the City of Nashville Sewer Use Ordinance, and any applicable State and Federal Pretreatment laws that may become effective during the term of this permit.

**D. Pollutants, substances, or wastewater prohibited by this section shall not be processed or stored in such a manor that they could be discharged to the POTW.**

**PART 4 – REPORTING REQUIREMENTS**

**A. Self-Monitoring Reports**

The permitted shall be responsible for submitting copies of all self-monitoring report(s) and chain of custody records to the City of Nashville. These self-monitoring report(s) shall indicate the nature, concentration, and quality control of all pollutants in the effluent for which sampling and analysis were performed.

**B. Self-Monitoring Report(s) Due Dates**

All self-monitoring reports are to be submitted by the permit holder to the Controlling Authority (City of Nashville) within ten (10) days of receiving the report from the permit

holders contract laboratory. This date may be monitored by the date of the analytical report.

**C. Additional Self-Monitoring**

If the permitted monitors any pollutant more frequent than required by this permit, using test procedures prescribed in 40 CFR 136 or amendments thereto, or otherwise approved by the State of Arkansas, or as specified in this permit, the results of such additional self-monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge. All additional self-monitoring reports shall be included with the permit fees monitoring reports described in paragraph (A) and (B) of this section.

**D. Automatic Re-sampling**

If sampling performed by the permitted indicates a violation, the permitted shall:

1. Inform the City of Nashville within 24 hours of becoming aware of the violation, and
2. Repeat the sampling and analysis and submit the results of the repeat analysis to the City of Nashville within thirty (30) days after becoming aware of the violation.

**E. Accidental Discharge Report**

1. The permitted shall notify the City of Nashville immediately upon the occurrence of an accidental discharge of substances prohibited by Section II, 10.12.08 of Ordinance 639 of 1993 or any slug loads or spills that may enter the public sewer. During normal business hours the City of Nashville Industrial Pretreatment Coordinator should be notified by telephone at (870) 845-4015. The notification shall include location of the discharge, volume, and corrective actions taken. The permit tee's notification of accidental releases in accordance with this section does not relieve it of other requirements that arise under local, state, or Federal laws.
  - a. Description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the permit tee's compliance status. The description should also include location of discharge, type, concentration, and volume of waste.
  - b. Duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance is reasonably expected to occur.
  - c. All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.

**F. Submission of Reports**

All reports required by this permit shall be submitted to the City of Nashville at the following address:

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City of Nashville  
Pretreatment Department  
426 North Main  
Nashville, AR 71852  
Attn: Ed Carlyle, Jr.  
Pretreatment Coordinator

**G. Certification Statement**

All wastewater discharge permit applications and Industrial User reports must contain the following certification statement and be signed by an authorized representative of the Industrial User.

“ 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 gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering 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.”

**H. Certification Statement concerning Totes**

1. A certification statement shall be submitted along with records of discharged wastewater stored in totes which were sent off to be disposed of on a quarterly basis. The quarters run as follows:

First Quarter:	January, February, and March
Second Quarter:	April, May and June
Third Quarter:	July, August, and September
Fourth Quarter:	October, November, and December

**I. Signatory Requirements**

All applications, reports, or information submitted to Nashville Public Works shall be signed and certified.

a. All permit applications shall be signed:

1. For a corporation: by a corporate officer or other persons performing a similar policy or decision-making function for the corporation;
2. For a partnership or sole proprietorship: by a general partner or the proprietor respectfully, and;
3. For a government entity: by the administrator, chairman, director, or principal

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executive responsible for operations of the facility.

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

1. The authorization is made in writing by a person described above;
2. The authorization specified 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. A duly representative may thus be either a named individual or any individual occupying a named position.

**J. Duty to Provide Information**

The permitted shall furnish to Nashville Public Works , within a reasonable time, any information which Nashville Public Works may request to determine whether cause exists for modifying, revoking, and reissuing, or termination this permit, or to determine compliance with this permit. The permitted shall also furnish to Nashville Public Works, upon request, copies of records required to be kept by this permit.

**K. Annual Publication**

A list of all industries which were deemed to be Significantly Noncompliant with Nashville Public Works Industrial Pretreatment Program during the twelve (12) previous months starting January 1, shall be annually published by Nashville Public Works in the largest daily newspaper within its service area.

<b>PART 5 – RIGHT OF ENTRY</b>
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A. The City of Nashville Pretreatment Department and any other duly authorized employees of the City of Nashville bearing proper credentials and identification are entitled to enter any public or private property at any reasonable time for the purpose of enforcing this permit and/or the City of Nashville Ordinance 639. Anyone acting under this authority shall observe the establishment's rules and regulations concerning safety, internal security and fire protection. The Pretreatment Department and other duly authorized employees of the City of Nashville may enter all private and public properties for the purpose of:

1. Inspection, observation, measurement, independent sampling, repairs, or inspection and copying of records;
2. Maintenance of any portion of the collection system laying within an easement;
3. Conduction any other authorized activity

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**B. Entry Denial**

If the City of Nashville Pretreatment Department or other authorized employee of the City of Nashville has been refused access to a building, structure or property or any part thereof, and if the City of Nashville has demonstrated probable cause to believe that there may be a violation of this permit or of the Ordinance 639, or that there is need to inspect as part of a routine inspection program of the City of Nashville designed to verify compliance with this permit, Ordinance 639 or order issued hereunder, or to protect the overall public health, safety and welfare of the community, then upon application by the City Attorney, the County Judge of the County of Howard, shall issue a search and/or seizure warrant describing therein the specific location subject to the warrant. The warrant shall specify what, if anything, may be searched and/or seized on the property described. Such warrant shall be served at reasonable hours by the Public Works Director in the company of a uniformed police officer of the City of Nashville. In the event of an emergency affecting public health and safety, inspections shall be made without the issuance of a warrant.

**PART 6 – CONFIDENTIAL INFORMATION**

- A. Information and data on a user obtained from reports, questionnaires, permit application, permits and monitoring programs and from inspections shall be available to the public without restriction unless the user specifically requests and is able to demonstrate to the satisfaction of the City that the release of such information would divulge information processes or methods of production entitled to protection as trade secrets of the users.
- B. When requested by the person furnishing a report, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public but shall be made available to governmental agencies for use related to this permit, the National Pollutant Discharge Elimination System (NPDES) permit, state disposal system permit and/or the pretreatment programs; provided, however, that such portions of a report shall be available for use by the state or any state agency in judicial review or enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics will not be recognized as confidential information.

**PART 7 – SPECIAL CONDITIONS**

**Section 1- Re-opener clause**

- A. This permit will be reopened and modified with any applicable more stringent requirement resulting from the City of Nashville Public Works re-evaluation of its local limits.
- B. This permit will be reopened and modified with any more stringent requirements developed by City of Nashville Public Works as are necessary to ensure POTW compliance with applicable sludge management requirements promulgated by the USEPA (40 CFR 503).

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- C. This permit will be reopened and modified with any more stringent requirements resulting from new effluent, sludge discharge, or other permits issued to the POTW by the USEPA or the ADEQ.

**Section 2- Compliance Schedule Reporting**

- A. Compliance Schedule: Non-Applicable
- B. No later than 14 days following each date in any compliance schedule, the permitted shall submit to Nashville Public Works a progress report including, at a minimum, whether or not it complied with the increment of progress to be met on such date, and, if not, the date on which it expects to comply with the increment of progress, the reasons for delay, and the steps being taken to return the project to the schedule established.

**PART 8 – STANDARD CONDITIONS**

**Section A: General Conditions and Definitions**

**1. Severability**

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.

**2. Duty to Comply**

The permitted 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 criminal penalties, injunctive relief, and summary abatements.

**3. Duty to Mitigate**

The permitted 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 non-complying discharge.

**4. Permit Action**

This permit may be modified, revoked, and reissued, or terminated for good causes including, but not limited to the following:

- a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements.
- b. Material or substantial alterations or additions to the discharger's operation which were

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not covered in the effective permit.

- c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.
- d. Information indicating that the permitted discharge poses a threat to Nashville's Public Works collection and treatment system, POTW, and personnel, or the receiving waters.
- e. Violation of any terms or conditions of this permit.
- f. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts, or;
- g. Upon request of the permitted, provided such request does not create a violation of any existing applicable requirements, standards, laws, or rules and regulations.

## 5. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, not any infringement of Federal, State, or local laws or regulations.

## 6. Limitation on Permit Transfer

Industrial user permits are issued to a specific user for a specific operation and are not assignable to another user or transferable to any other location without the prior written approval of Nashville Public Works. In the event of sale, the permitted must inform the purchaser of all responsibilities and obligations under this permit.

## 7. Duty to Reply

If the permitted wishes to continue an activity regulated by this permit after the expiration date of this permit, the permitted must apply for and obtain a new permit. The application must be submitted at least 90 days before the expiration date of this permit.

## 8. Dilution

The permitted shall not increase the use of potable or process water or, in any way, attempt to dilute an effluent as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

## 9. Adverse Impact

The permitted shall take all reasonable steps to minimize any adverse impact to the public treatment resulting from noncompliance with any effluent limitation specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the non-

complying discharge. The permitted shall immediately notify Nashville Public Works of slug discharges and spills that may enter the public sewer, or any other significant changes in operations, wastewater characteristics, and constituents.

**10. Definitions:**

**a. Daily Maximum – The maximum allowable discharge of pollutants during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic mean of the measurements taken that day.**

**b. POTW – Publicly owned treatment works. City of Nashville Public Works.**

**c. Composite Sample – A combination of individual samples obtained at regular intervals over a specific time period. The volume of each individual sample may be either proportional to the flow rate during the sample period (flow composite) or constant and collected at equal time intervals during composite period (time composite).**

**d. Grab Sample - An individual sample collected in less than 15 minutes, without regard to flow or time.**

**e. Instantaneous Maximum Concentration – The maximum concentration allowed in any single grab sample.**

**f. Cooling Water –**

**1. Uncontaminated - Water used for cooling purposes only which has no direct contact with any raw material, intermediate, or final product and which does not contain a level of contaminants detectably higher than that of the intake water.**

**2. Contaminated – Water used for cooling purposes only which may become contaminated either through the use of water treatment chemicals used for corrosion inhibitors or biocides, or by direct contact with process materials and/or wastewater.**

**g. Monthly Average – Other than for Fecal coli-form bacteria, is the arithmetic mean of the values for effluent samples collected over a period of 30 consecutive days. The monthly average for Fecal coli-form bacteria is the geometric mean of the value of the effluent samples collected over a period of 30 consecutive days.**

**h. Upset – Means an exceptional incident in which there is unintentional and temporary non-compliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permitted, excluding such factors as operational error, improperly designed or inadequate treatment facilities, or improper operation and maintenance or lack thereof.**

**i. Bypass – Means the intentional diversion of wastes from any portion of a treatment or pretreatment facility.**

## **Section B – Operation and maintenance of pollution controls.**

### **1. Proper Operation and Maintenance**

The permitted shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permitted to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: effective performance, adequate funding, adequate operator staffing and training and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

### **2. Duty to Halt or Reduce Activity**

Upon reduction, loss or failure of the treatment facility, the permitted shall, to the extent necessary to maintain compliance with its permit, control production or all discharges or both until operation of the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example when the primary source of power of the treatment facility fails or is reduced. It shall not be a defense for a permitted in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

### **3. Pretreatment Facilities**

If pretreatment or control is required, the City of Nashville Pretreatment Department and the City Code Inspector shall review the design and installation of equipment and processes. The design and installation of equipment and processes must conform to all applicable Statutes, Codes, Ordinances, and other laws. Any user responsible for discharges requiring pretreatment, flow equalizing or other facilities shall provide and maintain the facilities in effective operating condition at his own expense.

### **4. Report on changed conditions**

The permitted is required to notify the Pretreatment Coordinator of any planned significant changes to their operation or system which might alter the nature, quality or volume of its wastewater at least 45 days before the change.

### **5. Record Keeping**

The permitted is required to retain for a minimum of three (3) years, any records of monitoring activities and results, and shall make such records available for inspection and copying by the Director of Public Works, the State and EPA. This period of retention shall be extended during the course of any unresolved litigation regarding the permitted when requested by the Director, State or EPA.

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## 6. Record Contents

Records of sampling information shall include:

- a. The date, exact place, time, and methods of sampling or measurements, and sample preservation techniques or procedures;
- b. Who performed the sampling or measurements;
- c. The date(s) analyses were performed;
- d. Who performed the analyses;
- e. The analytical techniques or methods used, and;
- f. the results of such analyses.

## 7. Falsifying Information

Knowingly making any false statement on any report or other 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 injunctive relief.

## 8. Bypass

### a. Definitions:

(1) Bypass means the intentional diversion of waste-streams from any portion of an Industrial User's treatment facility.

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

b. Bypass not violating applicable Pretreatment Standards or Requirements. Any Industrial User may allow any bypass to occur which does not cause Pretreatment Standards or Requirements to be violated, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provision of paragraphs (c) and (d) of this section.

### c. Notice.

(1) If an Industrial User knows in advance of the need for a bypass, it shall submit prior

notice to the Control Authority, if possible at least ten days before the date of the bypass.

(2) An Industrial User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Control Authority within 24 hours from the time the Industrial User becomes aware of the bypass. A 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 reoccurrence of the bypass. The Control Authority may waive the written report on a case by case basis if the oral report has been received within 24 hours.

d. Prohibition of bypass.

(1) Bypass is prohibited, and the Control Authority may take enforcement action against an Industrial User for a bypass, unless;

- (i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- (ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime or preventive maintenance; and
- (iii) The Industrial User submitted notices as required under paragraph (c) of this section.

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

9. Removed Substances

Solids, sludge's, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters 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.

**PART 9 – ENFORCEMENT**

A. Fines

Any user who is found to have violated an order of the City of Nashville City Council or who willfully or negligently failed to comply with any provision of the City Ordinance 639, the Orders, Rules, Regulations and Permits issued hereunder, may be fined up to a maximum of \$1,000.00 for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition to the penalties provided herein, the City may recover reasonable attorney's fees, court cost, and

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other expenses of litigation by appropriate suit at law against the person found to have violated the City Ordinance or the Orders, Rules, Regulations and Permits issued hereunder.

**B. Suspension**

1. The Director of Public Works may suspend the wastewater treatment service and/or the wastewater discharge permit when such suspension is necessary, in the opinion of the Director, in order to stop an actual or threaten discharge which presents or may present an imminent or substantial endangerment to the health or welfare of persons or the environment , causes interference to the POTW or causes the City to violate any condition of its NPDES permit.

2. Any user notified of a suspension of the wastewater treatment service and/or the wastewater discharge permit shall immediately stop or eliminate the contribution. In the event off a failure of the person to comply voluntarily with the suspension order, the Director shall take such steps as deemed necessary including immediate severance of the sewer connection, to prevent damage to the POTW system or endangerment to any individuals. The Director shall reinstate the wastewater discharge permit and/or the wastewater treatment service upon proof of the elimination of the non-complying discharge. A detailed written statement submitted by the user describing the causes of the harmful contribution and the measures taken to prevent any future occurrence shall be submitted to the Director within five (5) days of the date of occurrence.

**C. Termination - Wastewater discharge permits may be terminated for the following reasons:**

1. Violation of permit conditions.
2. Failure to accurately report the wastewater constituents and characteristics of its discharge.
3. Failure to report significant changes in operating or wastewater constituents and characteristics.
4. Refusal of reasonable access to the user's premises for the purpose of inspection, monitoring or sampling.

**PART 10 – SURCHARGES AND FEES**

**A. Surcharges**

The permitted shall be equitably charged by the City for wastewater services received. When the Biochemical Oxygen Demand (BOD) or Total Suspended Solids (TSS) exceed the range of concentration of pollutants in normal domestic sewage, as defined in Ordinance 640., a surcharge shall be levied.

**B. Fees**

It is the purpose of this Section to provide for recovery from the permitted the costs expended by the City in providing wastewater services. The City may adopt charges and fees for the following:

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## JAN-EZE PLATING FACT SHEET

When the pretreatment program was approved in 1993, Jan-Eze Plating located at 100 Mission Drive in Nashville was already established as a company exemplified by the environmental safety and corporate policies and guiding principles they follow. The founder, Dale Hart, discovered the need for an industrial chromium plating facility in the mid-south. In September of 1986, Jan-Eze Plating, with thirteen (13) employees and 2500 square feet of production, opened for business. Today, 2011, the company has expanded to a more diversified operation covering 40,000 square feet. The company name is a combination of the names of the wives of the two original founders.

The company was formed as a support satellite industry for Husquvarna Outdoor Products. However, their first shipment originated September 11, 1986 from their steel plating division to Parker Hannifan of Benton, Arkansas. The steel division today serves over twenty-five (25) customers. Their major customer is Husquvarna Outdoor Products, which is an aluminum piston and cylinder plating customer.

The company was fortunate to acquire Larry Fronapple from Aero-Metal Craft, Incorporated as their new plant manager right off the bat. Frank Hetzel became the environmental technician/safety manager before leaving in 2007. John Anderson then took over in the position and became the pretreatment contact person for the City of Nashville and is presently still in that position as of 2011.

Arriving at the front door a customer and me must sign in the welcome book. John will then come to the front office and guide you back to the plant. His office is directly to the left through the plastic curtain. To the left of the office is the wastewater system. You will first notice a sludge dryer system which dries the sludge



form the floc clarifier. After the sludge is dried, it is loaded into totes which are stored in the back of the plant clearly marked.

The treatment process consists of two systems: a continuous system and a batch treatment system. Waste water from all processes is directed to either a 3000 gallon rinse tank or to the floor. From the floor, it is pumped into the rinse tank or a chrome concentrate tank. A new room has been added with a cast 6500 system. This system separates the chrome from the water. Water is then used for rinses and chrome is used over. This \$400,000 dollar system has decreased the need for more chrome and water, saving thousands in company cost products.

Waste water is pumped from the rinse tank into the first treatment tank. Sodium hydroxide is added to bring pH up to 2.3. Sodium bisulfate is added to reduce the hexavalent chromium to trivalent chromium. The wastewater gravity flows into the next tank where sodium hydroxide is added to bring the pH up to 8.8. Then an Effluent Metal Reducer II is added to aid in the precipitation process and forms an organic metallic precipitant particle. Next tank sodium hydroxide is added to maintain a pH of 8.6. Coagulite 101 is added which bonds the particles together. Next step is a flash floc tank where polymer is added, making the particles heavier and larger. From the floc tank, heavy particles go to the sludge tank. The water goes through two sand filters and the wastewater is discharged to the city.

The batch system is all the same process except the process takes place in the large tank. There is a 4000 gallon diversion tank and is used as a diversion if something breaks down.

Next to the waste treatment system is the piston plating line, where nickel plating takes place. They also have a cylinder line which chromating takes place. Cylinders are placed in an oil cooler then a oil filter after they are honed to prevent rust from occurring. Jan-Eze also has a strip tank for those parts which the chrome does not adhere to.

Another area and process which has been a benefit to production is the steel line. The steel line has huge pits where very large cylinders used on caterpillars are chrome. Jan-Eze has also picked up production by chromating the inside of huge water gate valves from a four inch line to a twenty-four inch gate valve.

All finished products are stored in a loading dock room, where customers pick the products up for delivery. The whole plan is surrounded by a four inch berm. Any spill or accident will be diverted to the waste water system pit to be treated.

# Aero Metal Inc

600 Mill Street  
Nashville Arkansas 71852  
Permit # NA001

## Monthly Discharge Report

Report Month DEC 2011

There were no discharges or disposal of industrial wastewater from this facility during the reporting month

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.

Tim McNulty  
Authorized Representative

President  
Title

1/16/2012  
Date

  
Signature of Authorized Representative

# Aero Metal Inc

600 Mill Street  
Nashville Arkansas 71852  
Permit # NA001

## Monthly Discharge Report

Report Month NOV 2011

There were no discharges to the POTW.

The facility shipped the following to a Treatment Disposal Storage permitted facility.

Nov 11, 2011

3200 gallons rinse water

(4) 55 gallons NCNS stripper D002

(4) 55 gallons Chrome Rinse Water D007 >5% Chrome

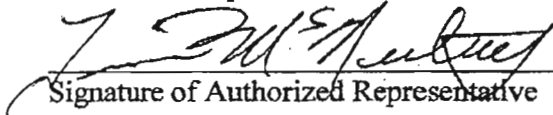
(2) 55 gallons Carbon and oil waste

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.

Tim McNulty  
Authorized Representative

President  
Title

12/14/2011  
Date

  
Signature of Authorized Representative

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>ARD790869588</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>800 535 5053</b>	4. Manifest Tracking Number <b>002234027 FLE</b>					
5. Generator's Name and Mailing Address <b>Hero Metal Products Inc</b> <b>600 S Mill</b> <b>Meridian, AR 71852</b> Generator's Phone: <b>(870) 845-4025</b>										
6. Transporter 1 Company Name <b>HE Environmental Inc</b>										
7. Transporter 2 Company Name										
8. Designated Facility Name and Site Address <b>Chrom Woodson Super Park LP</b> <b>2127 Independence Parkway South</b> <b>LaPorte, TX 77571</b> Facility's Phone: <b>(281) 930-2300</b>										
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	X	1. UN3266, Waste Corrosive Liquids, basic, inorganic, conc. 0.5 (Sodium carbonate) 9. PG II			003 DF	1400	P	Out 119H		
	RR	2. UN3082, Waste environmentally hazardous substances, liquid, conc. 0.5 (chromate Rinse water) 9. PG III (007)			004 DF	1800	P	Out 119H		
		3.								
		4.								
14. Special Handling Instructions and Additional Information <b>1 CH 489656 3X55</b> <b>2 CH 489640 4X55</b>										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Offeror's Printed/Typed Name <b>Tom McNulty</b>					Signature <i>[Signature]</i>			Month Day Year <b>11 11 11</b>		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____										
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials									
	Transporter 1 Printed/Typed Name <b>Eric Murgerson</b>					Signature <i>[Signature]</i>			Month Day Year <b>11 11 11</b>	
Transporter 2 Printed/Typed Name					Signature			Month Day Year		
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
	18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____									
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a										
Printed/Typed Name _____					Signature _____			Month Day Year _____		

A4c

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number ARD940869588	2. Page 1 of 1	3. Emergency Response Phone 800 535 5053	4. Manifest Tracking Number 002234034 FLE	
5. Generator's Name and Mailing Address Auro Metal Products Inc 600 South Mill Windsor, AR 71852 Generator's Phone: 870 245 4025						
6. Transporter 1 Company Name Tribal Transport Inc.						
7. Transporter 2 Company Name						
8. Designated Facility Name and Site Address Newpark Environmental Services LLC 26400 Wilber Rd Windsor, AR 71852 Facility's Phone: (870) 984-4445						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity
				No.	Type	12. Unit WL/Vol.
		1. Non Recycled Material, NA, Non Hazardous Plating Rinse Water & Vibrator Rinse Water		001	TT	EST 3100 G
		2.				
		3.				
	4.					
13. Waste Codes Outs 1131						
14. Special Handling Instructions and Additional Information 1011-10199 (Newpark 111711459B4) Direct only: Mixture of Nickel Plating Rinsewater & Vibrator Rinse Water						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offoror's Printed/Typed Name Signature Month Day Year 11/11/11						
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Signature Month Day Year Transporter 2 Printed/Typed Name Signature Month Day Year						
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Signature Month Day Year						

A-4d

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <i>ARD9702690 PA</i>		2. Page 1 of		3. Emergency Response Phone <i>408 535 5053</i>		4. Manifest Tracking Number <i>002234281 FILE</i>				
		5. Generator's Name and Mailing Address <i>Delta Chemical</i>						Generator's Site Address (if different than mailing address)				
Generator's Phone: <i>903 967 2478</i>		6. Transporter 1 Company Name								U.S. EPA ID Number		
7. Transporter 2 Company Name										U.S. EPA ID Number		
8. Designated Facility Name and Site Address <i>R. ARDLO 1077 Veterans Rd Macon GA 31205</i>		Facility's Phone: <i>(504) 778-9089</i>								U.S. EPA ID Number <i>ARD981057870</i>		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
						No.	Type					
		1. UN3077, Waste Liquid, environmentally hazardous substances, 3rd class (chromic acid solution) 9, PG III				001	DF	250	P		0007	T006
		2. UN3077, Waste Liquid, environmentally hazardous substances, 3rd class (chromic acid solution) 9, PG III				002	DF	250	P		T006	
		3. UN3077, Waste Liquid, environmentally hazardous substances, 3rd class (chromic acid solution) 9, PG III				010	DM	4700	P		P007	
	4. Non-Hazardous, Non-Flammable, Non-Corrosive, Non-Toxic, Non-Regulated Material (NA) (Acetic Acid)				003	DM	900	P				
14. Special Handling Instructions and Additional Information <i>1 1007-08733 2355</i> <i>3 1007-08736 1055</i> <i>2 1007-08732 2355</i> <i>4 1007-08737 2355</i>												
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.												
Generator's/Offeror's Printed/Typed Name								Signature		Month Day Year <i>07 22 10</i>		
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____											
	17. Transporter Acknowledgment of Receipt of Materials											
	Transporter 1 Printed/Typed Name								Signature		Month Day Year <i>07 27 10</i>	
Transporter 2 Printed/Typed Name								Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy											
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
	18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____											
18c. Signature of Alternate Facility (or Generator) Month Day Year												
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
1. _____			2. _____			3. _____			4. _____			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a												
Printed/Typed Name								Signature		Month Day Year		



**NASHVILLE PUBLIC WORKS**

**INDUSTRIAL USER INSPECTION REPORT**

**Inspection Date: 7/7/2011    Inspection Time: Start 09:00    Finished 10:30    DateLast Inspection: 2/3/11**

**I.    TYPE OF INSPECTION**

**A. Scheduled: XX    Un-scheduled:    Demand:**

**II.   GENERAL INFORMATION**

**A.    Company Name: Jan-Eze Planting, Inc.**

**B.    Company Mailing Address: 100 Mission Drive**

**C.    Company Street Address: 100 Mission Drive**

**D.    Year Operations Began: 1986**

**E.    Name of Authorized Representative: Larry Franappel**

**Title or Position: Plant Manager**

**Telephone Number: 870-845-5134**

**Email address: larry.jan-eze@totalnet.us**



F. **Name of Pretreatment Contact:** John Anderson  
**Title or Position:** Environmental/Safety Manager  
**Telephone Number:** 845-5134 **Cell Phone:**  
**Email Address:** <janderson@janezeplating.com>

G. **Company personnel present at Inspection:**

<b>Name:</b> John Anderson	<b>Name:</b>
<b>Title:</b> Environmental/Safety Manager	<b>Title:</b>
<b>Name:</b>	<b>Name:</b>
<b>Title:</b>	<b>Title:</b>

H. **Number of Employees:** 35

**Number of Shifts:** 3

**Days per Week:** 5

**Times:** Shift One – Monday thru Friday  
6:00 am until 2:00 pm  
Shift Two – Monday thru Friday  
2:00 pm until 10:00 pm  
Shift Three – Monday thru Friday  
10:00 pm until 6:00

III. **PRODUCT/SERVICE INFORMATION**

A. **Description of primary manufacturing or service activities:**

Applying chrome or nickel to chain saw cylinders or lawn blowers or chrome on big cylinders for catipillars.

B. **Principal raw material used:** Chrome, Nickel, Polymers, Acids

C. Principle products produced: Products are not produced at this plant, only plating

D. List all processes occurring at the facility: chromating, nickel plating, rinsing, Neutralization, scrubbing, cleaning, heating, buffing, polishing, honing.

IV. WATER SOURCE INFORMATION

A. Water Supply From Where? City of Nashville

Public Water Supply: XXX Account Number: 06-5140-00  
06-5130-00

Is there a water Meter? Yes XX No If yes, give the name or company which is supplying the water: City of Nashville

Private Well – Location:

Surface Water – Location:

B. Monthly Water Usage: For July was 447,000 (2''), 114,000 (1'') on other meter

C. How was water usage obtained: Water Usage records at city hall

V. WASTEWATER INFORMATION

A. Discharge Classification: Metal Finisher

Categorical Waste Stream (40 CFR): 433.17

Existing or New Source: New Source

Other:

B. Is Industrial User on Production Based Standards? Yes No **XX**

If Yes, specify Annual Production Rates:

VI. SAMPLING PROCEDURES/INFORMATION/LOCATION

Number of Outfall(s): One (NA003

Describe location of Outfall(s): There is a white round small holding tank which allows the flow to flow through it to the discharge line. In back of filtering marked NA003 on the lid

Are the outfall(s) representative of the operation? Yes **XX** No

Is the Combined Waste-Stream Formula Employed? Yes No **XX**

Are the Waste-Streams metered? Yes **XX** No\_ If yes, describe flow metering device: Blue White Industries has installed a magnetic flow meter,

Is meter calibrated? Yes No If yes, are there records?

Are flow records available for the inspector? Yes **XX** No

Give a brief description of sampling procedures: the city pretreatment coordinator sets up an ISCO sampler in the small tank labeled NA003. A sample is drawn ever hour for a twenty-four hour sample. The sample then is split with the IU and both samples are sent out the same day. This is for quality assurance with both laboratories.

Does the file contain CIU sampling results: Yes No

Did the CIU sample as frequently as required by its approved Program or permit: Yes **XX** No

Do the sampling reports have the following?

1. Name of sampling personnel: Yes  No
2. Sample date and time: Yes  No
3. Sample type: Yes  No
4. Wastewater flow at the time of sampling: Yes  No
5. Is sample preservation: Yes  No
6. Results for all parameters required by CIU: Yes  No
7. Chain of Custody's correctly filled out: Yes  No

Were 40 CFR 136 analytical methods used: Yes  No

Has the IU appropriately implemented all applicable TTO monitoring requirements: Yes  No

Is a certified laboratory used for wastewater analyses? Yes  No

If yes, give name and address: Rineco Analytical Services  
819 Vulcan Road-Haskell  
Benton , AR 72105

Has sampling requirements been met for the last three years? Yes  No

## VII. PRETREATMENT

- A. Has there been any process changes, raw material or chemistry changes since the last inspection? Yes  No  If yes, explain: \_\_\_\_\_
- B. Does IU have updated pretreatment technology? Yes  No
- C. Does the IU require a licensed operator for it's pretreatment system? Yes  No  If yes, give classification and number:
- D. Is the IU operating under a compliance schedule to install pretreatment technology or otherwise attain compliance with applicable standards? Yes  No  If yes, describe:

- E. Does the IU generate any sludge or residuals as a result of its operations?  
Yes  No  If yes, describe: Sludge is dried in an oven/furnace and  
put into totes location in back and hauled off
- F. Are waste manifest available? Yes  No  If yes, attach to form.

**VIII. WASTE GENERATED/ACCIDENTAL SPILL PREVENTION**

- A. Does the IU generate waste process material such as spent solvents,  
acids, oils, etc? Yes  No  If yes, classification of the waste:
- B. Does the IU have a designated or centralized area for the storage of  
hazardous waste? Yes  No  If yes, describe the location: In  
storage area in back of plant, in totes clearly marked.

Is this area located near a sanitary sewer drain? Yes  No

Is the material which is stored, protected by any type of containment  
structure? Yes  No  If yes, describe: totes

- C. Does the IU generate any residuals, (scrap metal, paper products, etc)  
as a result of it's operation? Yes  No  If yes, describe:

How is the waste product disposed of?

- D. Does the IU have an Accidental Spill Prevention Plan? Yes  No

Date plan became effective: September 2006 Date revised: October 2009

- E. Does the IU have spill notification procedures posted? Yes  No

Located where:

- F. Does the IU follow ASP procedures during an accidental spill event?  
Yes  No

- G. Date of last accidental spill event? June 22, 1999

Describe: see last inspection report

- H. Does the IU keep records of accidental spill events? Yes  No
- I. Has the IU submitted MSDS on all products used within the facility?  
Yes  No
- J. Are these products identified within the ASP? Yes  No

IX. SLUG CONTROL

- A. Does the IU have a Slug Control Plan? Yes No

If yes, is a copy of the IU's slug control plan on file with the POTW?  
Yes No

- B. Date slug control plan was submitted:

- C. Does the IU's slug control plan address the following:

1. Has the industrial user ever been responsible for accidental discharges that affected the POTW within the last year? NA

a. If so, what was the outcome? NA

b. What measures have been taken to prevent occurrence?

c. Were the discharges properly reported to the POTW?

Yes  No

2. Has the industry's treatment process been reliable? Yes  No

3. Are they able to maintain compliance on a consistent basis?

Yes  No

4. Is their treatment subject to frequent overloads due to inadequate sizing or highly variable production? Yes No

5. Have procedures at the industry made it necessary to bypass treatment within the last year? Yes No **XX**

6. Procedures to prevent adverse impact from accidental spills, which include the following:

a. Are bulk chemicals stored in areas where they could possibly enter the collection system? Yes No **XX**

b. Are there open floor drains in the storage areas? Yes No **XX**

c. Do material handling and transfer procedures make an accidental discharge possible? Yes No **XX**

d. How are wastes conveyed to the treatment system? **XX**

e. Is it possible for foreign wastes to accidentally enter a treatment unit and upset the system? Yes No **XX**

f. For industries that have segregated waste streams requiring separate treatment technology, what steps are taken to keep those waste-streams from accidentally commingling? **NA**

X. CHEMICAL/HANDLING/STORAGE PROCEDURES

A. Are all chemicals stored in a safe environment? **YES**

B. Is there a schematic which is updated in the pretreatment record file for Jan-Eze Plating showing chemicals (list) and tank volumes? **YES**

C. Are all chemicals marked for contents/labeled? **YES**

D. Does the IU have a printed chemical list available for the city: Yes **XX** No

E. Does the IU need a slug control plan: Yes No **XX**

F. Date of Last Slug Control Questionnaire: **2011**

**XI. POLLUTION PREVENTION**

- A. **Have any changes been made to reduce or eliminate any wastewater discharge? Yes No  If yes, describe:**
- B. **List all operations that are currently considered closed looped systems?**
- C. **Have any operating procedures been improved? Yes  No  If yes, describe: Not in the last year, but over the five years.**
- D. **Is the IU aware of the concept of Best Management Practices? Yes  No**
- E. **Has the IU been given a Best Management Plan? Yes No**
- F. **Has your company inherited pollution prevention practice' such as production modifications, operational changes, material substitutions, water conservation and other such measures? Yes No  If yes, describe them: Not within the last year**
- G. **Has the Pretreatment Inspector explain the concept of Best Management Plan and Preventive Maintenance to the company contact? Yes  No**

**XI. INSPECTOR'S COMMENTS**

- A. **Describe all deficiencies noted during the inspection:  
There are none at this time.**
- B. **Describe all recommendations made during the inspection:  
There are none at this time.**

**Inspection observations or process areas including pretreatment systems:**

- 1. **Cleanliness: Good  Fair Poor**
- 2. **Containment structures: Good  Fair Poor**



3. Storage areas: Good **XX** Fair Poor

4. Chance of Slug Potential: Good **XX** Fair Poor

**Comments: This company is always way ahead of any other plating company when it comes too protecting the environment, because of the owner down to the cleaning man who does the floors. Larry, John, and John Anderson are the top of the crop. I have always enjoyed working with them and have never felt in danger from any contamination or breathing at their plant.**

C. Inspectors Signature:   
Ed Carlyle, Jr.

**Title: Pretreatment Coordinator**

**Date: 7/7/2011**

*Attachment A-6*

## **NASHVILLE PUBLIC WORKS**

426 North Main, Nashville, AR 71852  
PH (870) 845-4015, FAX (870) 845-7409

### **Industrial Pretreatment Slug/Spill Evaluation Checklist**

**SIU Name: Jan-Eze Plating**

**Permit Number: NA003      Contact: John Anderson**

**1. Spill Plan**

**a. Type on File (PIPP, SPCC, TOMP, Contingency): \_\_\_\_\_**

**Date: \_\_\_\_\_**

**Number of Spills in the last three (3) years: None**

**2. Employee Training, describe stations, processes or procedures discussed and at what frequency:**

**Employees are trained and qualified when put into a work area. Then on a monthly basis they have a safety training secession**

**3. Chemical Storage**

**a. Attach a chemical list, including location of chemical, quantity stored, and container size.**

**b. Containment: Yes XX No    Describe containment:**

**see attachment**

**Condition: Good      Fair      Poor      N/A**

**c. Drains/Trenches: Yes XX      No      Routed to: 3000 gal tank or pit**

d. Spill Potential (High, Medium, Low) Very Low

4. Describe placards and where they are located. These should have emergency (City) numbers to call in the event of a slug discharge to the sewer system:

All emergency numbers are by all phones in the plant

5. Manufacturing Processes

a. Process solutions in tanks

Chemical Name	Location(attach sketch)	Tank Size(Gal.)
---------------	-------------------------	-----------------

see attachment B

b. Do process solution tanks overflow? Yes No **XX**

If no, is overflow liquid contained? Yes **XX** No

Describe containment: By a ditch that flows to the waste treatment system

Condition of containment: Good **XX** Fair Poor N/A

c. Drains/Trenches: Yes **XX** No Routed to: waste treatment pit or

3000 gallon tank in basement of treatment system

d. Spill Potential: (High, Medium, Low): Low

6. Pretreatment System

a. Evaluate potential for operating upsets (High, Medium, Low): Low

- b. Calibration frequency of instrumentation and/or equipment (specify):  
daily, weekly, and monthly
- c. Spare parts on hand: Yes  No
- d. Excess wastewater holding capacity: Yes  No
- e. Is there a control system to monitor operation of treatment system?  
Yes  No
- f. By-pass potential: High      Medium      Low      N/A

**Loading/Receiving Docks**

- a. Drains/Sumps: Yes  No      If yes, routed to: 3000 gallon in  
waste treatment pit or pit itself

Storm      Sanitary      Pretreatment       Other

**Specific Prohibitions (Nashville Sewer Ordinance)**

- a. Are any items present? Yes      No
- b. Potential to discharge: Yes      No

**9. Non-Routine Batch Discharges**

- a. Does facility have these type of discharges? Yes      No
- b. Name of chemical solution discharged:

10. **Non-Discharged Wastes**

- a. **Are any generated? Yes  No**
- b. **If yes, list the non-discharged wastes: See Attachment C**

<b>Type of Waste</b>	<b>Quantity per Year Generated</b>	<b>Disposal Method</b>
----------------------	------------------------------------	------------------------

- c. **Describe protective measures to prevent accidental discharge of these substances into the sanitary sewer system:**

**There is a four inch (4") curb surrounding the entire plant which would collect any spill and route it to the large underground pit in the waste treatment area**

**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:**

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- e.  **No Slug/Spill Control Plan is necessary at this facility**

---

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*A-6 d*

Ed Carlyle

Signature

Pretreatment Coordinator

Title

7-7-2011

Date:

A6c

ICIS NPDES: Add Inspection - Windows Internet Explorer

https://icis.epa.gov/icis/inspection/AddInspection.do?actionMethod=initiate&epaOrState=5&CMTtype=INS&fromICISV

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google G Go Bookmarks Popups okay Check AutoLink AutoFill Send to Settings

ICIS NPDES: Add Inspection

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation \* Compliance Monitoring Type: AFO Defined  
 \* State: AR AFO Designation  
 Compliance Monitoring Activity Name: *Pretreatment Program Audit*  
 (Allen Gilliam)  
 Audit  
 Audit (IU)

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

Program System Acronym Identifier Facility Site Name Address FRS ID

NPDES *ARDO 21776* VALIDATE

Compliance Monitoring Dates

Planned Start Date: *2/22/12* Actual Start Date: *2/22/12*  
 Planned End Date: *2/24/12* Actual End Date: *2/24/12*

Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act  
 \* Programs: NPDES - Post Administrative Penalty Case (Settlement)  
 NPDES - Pretreatment  
 NPDES - Sanitary Sewer Overflow (SSO)  
 NPDES - Section 308 Information Requests  
 NPDES - Sludge/Biosolids  
 State Statute:

\* Compliance Monitoring Action Reason: Agency Priority  
 Citizen Complaint/Tip  
 Core Program  
 For Cause  
 Random Inspection  
 \* Compliance Monitoring Agency Type: State Contractor  
 State - Using Federal Credential  
 State  
 Regional  
 Other Federal  
 Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist?: No  
 Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? State  
 If Joint, what was the purpose of the participation of the other party?  
 Which party had the lead?

Government Contacts

Affiliation Type	First Name	Last Name	Phone	Office	Organization
SIC Codes:	Codes		Priorities		
NAICS Codes:	ADD / REMOVE		OECA National Priority: 2009 - (CA Only) - Air Toxics - Flares 2009 - (CA Only) - Air Toxics - LDAR 2009 - (CA Only) - Air Toxics - Surface Coating 2009 - (CA Only) - Financial Assurance 2009 - (CA Only) - MP - Mining Regional Priority: 2009 - Region 06 - Air Toxics Major Sources (O & G) 2009 - Region 06 - Brine Spills from Oil & Gas Operations 2009 - Region 06 - CD Implementation 2009 - Region 06 - Minor Wastewater Collection & Treatment System 2009 - Region 06 - Petroleum Refining		

Media Monitored: Compliance Monitoring Media Indicator

Multimedia Indicator:

Compliance Monitoring Information

Number of Days Physically Conducting Activity: *2.75*  
 Number of Hours Physically Conducting Activity: *22*  
 Compliance Monitoring Action Outcome: *Satisfactory*  
 Compliance Monitoring Rating Code:

Compliance Monitoring Comments:

User Defined Fields

1:

Trusted sites 100%



AR0022187 Nashville Audit (Allen Gilliam)

Special Programs Pretreatment

Significant Industrial Users (SIUs)

SIUs :

SIUs Without Control Mechanism :

SIUs Not Inspected :

SIUs Not Sampled :

SIUs in SNC with Pretreatment Standards :

SIUs in SNC with Reporting Requirements :

SIUs in SNC with Pretreatment Schedule :

SIUs in SNC Published in Newspaper :

SIUs on Schedules :

Violation Notices Issued to SIUs :

Administrative Orders Issued to SIUs :

Civil Suits Filed Against SIUs :

Criminal Suits Filed Against SIUs :

Local Limits

Date of Most Recent Technical Evaluation for Local Limits :

Date of Most Recent Adoption of Technically Based Local Limits :

Local Limit Pollutants :

POLLUTANTS:

Removal Credits

Removal Credits Application Status :

Date of Most Recent Removal Credits Approval :

Removal Credits :

POLLUTANTS:

Categorical Industrial Users (CIUs)

CIUs :

CIUs in SNC :

Acceptance of Waste

Acceptance of Hazardous Waste :

Acceptance of Non-Hazardous Industrial Waste :

Acceptance of Hauled Domestic Wastes :

Penalties

Dollar Amount of Penalties Collected : \$

Industrial Users (IUs) from which Penalties have been collected :

Deficiencies

Deficiencies Identified During IU File Review :

Control Mechanism Deficiencies :

Legal Authority Deficiencies :

Deficiencies in Data Management and Public Participation :

Deficiencies in Interpretation and Application of Pretreatment Standards :

Inadequacy of Sampling and Inspections :

Adequacy of Pretreatment Resources :

Other Information

SUO Reference :

SUO Date :

Annual Pretreatment Budget : \$

Pass-Through/Interference Indicator :

Violation of IU Schedule for Remedial Measures :

Formal Response to Violation of IU Schedule for Remedial Measures :

Annual Frequency

Annual Frequency of Influent Toxicant Sampling :

Annual Frequency of Effluent Toxicant Sampling :

Annual Frequency of Sludge Toxicant Sampling :

<< PREVIOUS SAVE & EXIT SAVE & CONTINUE SAVE & ADD ANOTHER COPY & CREATE NEW CANCEL