

ADEQ

ARKANSAS
Department of Environmental Quality

April 19, 2016

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 23 - 24, 2016. 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 Nashville's Pretreatment Program and its implementation. Pollution Prevention activities appear to be non-existent. Many of the audit/assessment recommendations are meant to aide your Programs further evolve in achieving the Clean Water Act's objectives to eliminate discharge of pollutants to the environment.

Cross training another employee from your staff in the day-day activities of the current City Pretreatment Coordinator should be priority 1 in this office's opinion.

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

Please feel free to contact this office with any questions at (501) 682-0625.

Sincerely,



Allen Gilliam
NPDES Pretreatment Coordinator

ec: Rudy Molina/EPA 6WQ-PP
Bryan Leamons/NPDES Permit Supervisor
Jason Bolenbaugh/Inspector Supervisor
Gina Porter/NPDES Enforcement Analyst
David Ramsey/ICIS Coordinator
E/NPDES/NPDES/Pretreatment/Reports

**PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT**

CITY OF NASHVILLE, ARKANSAS

NPDES PERMIT #AR0021776

April 19, 2016

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 23rd through the 25th, 2016, 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 (exit interview)

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 substantial 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 modifications were due 12 months from its effective date, 2/1/10.

A Pretreatment Ordinance (#919) was submitted, approved and adopted on 8/28/12. Different sections of the Program narrative were submitted from 2/15/12 to 2/16/16. A complete Program needs to be submitted in a three-ring notebook in the order in which the City deems necessary. This office has piecemeal submittals of different sections and cannot ascertain exactly what order they should be in or if it is complete.

The City's wastewater treatment plant consists of an equalization basin, activated sludge, two (2) aeration basins, two (2) clarifiers, sludge belt press, post aeration and UV disinfection.

Since 6/15 through 9/15 the City's effluent has exhibited lethality and sublethality to the ceriodaphnia dubia. The City has passed WET tests from 10/15 through 12/15 [last three (3) tests].

The plant's design flow is 3.5 MGD and averages about 1.7 MGD with 0.02 MGD being contributed by one (1) significant industrial user, a Metal Finisher regulated under 40 CFR 433.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to two (2) industrial users one being an informal since it (another Metal Finisher) was not yet operational yet. 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(s) 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)**, “The POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to: (i) Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users [IUs] made under this paragraph shall be made available to [ADEQ] upon request; and (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 [ADEQ] upon request.”

During the checklist review an index, inventory or compilation of IUs could not be produced. The City should conduct another industrial user/business survey to all potential non-domestic wastewater dischargers and create an index or compilation from each survey's pertinent information See EPA's “Guidance Manual for POTW Pretreatment Program Development” at <https://www3.epa.gov/npdes/pubs/owm0003.pdf>, Chapter 2 for details summarizing these surveys and Tables 1 and 2 for example IUs' pertinent information to be compiled/summarized.

Include screen printers, auto body repair/paint shops, hospitals, hospices, long term care facilities, dentists, chiropractors, schools (toxic/haz waste lab chemicals?), car/truck washes, machine shops, etc. Pertinent information then can be gleaned from each surveyed and digested into a spreadsheet showing which are sanitary only and those that are discharging or have the potential to discharge toxic pollutants into the City via floor drains or simply pouring their wastewater into a sink or toilet.

These survey questionnaires could be somewhat tailored to “fit” each business sector's operations and include Pollution Prevention (P2) questions regarding source reduction, waste minimization, energy and/or water conservation.

2) Jan-EZE's permit requires them “*to test and sample for all TTO compounds listed under 40 CFR 433.11(e) once per five years*” although the facility had submitted a toxic organic management plan in 1995. Under **40 CFR 403.8(f)(2)(v)**, “Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards...”

Documentation of the City's once/5 yrs “TTO” sampling could not be produced. The City must also sample Jan-EZE's wastewater once/5 yrs or remove the requirement if deemed not necessary.

3) Under **40 CFR 403.12(e)(1)**, Any Industrial User subject to a categorical Pretreatment Standard ...after the compliance date of such Pretreatment Standard, or, in the case of a New Source, after commencement of the discharge into the POTW, shall submit to the [Nashville] during the months of June and December, unless required more frequently in the Pretreatment Standard or by the Control Authority, a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical Pretreatment Standards.

It was discovered during the file review Jan-EZE's periodic reports listed their Metal Finishing permit limits intermixed with the monthly averages and daily maximums (see Atch. A-4b). This must be revised to separate and include ALL the Metal Finishing standards in 40 CFR 433.17.

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

1) Strongly recommend revising and dating existing fact sheet(s) in each IU file updating/including pertinent information such as: comprehensive narrative of all process/manufacturing operations, wastewater flow schematics with sampling point clearly marked, basis for permit limits, facility's authorized representative, main contact's contact information, monitoring frequency, parameters monitored for, picture of actual sampling point, brief chronological history (start-up date, compliance, e.g.) and Pollution Prevention activities.

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 as necessary. Inspections can reference "process/manufacturing operations", "wastewater schematics", etc. as "can be found in City's file".

2) Strongly recommend cross training another employee on ALL aspects of implementing the day-to-day procedural activities of the City's Pretreatment Coordinator.

3) Strongly recommend including in the City's Pretreatment Program standard operating procedures for the day-to-day activities of the City Pretreatment Coordinator (sampling, inspections, paperwork processing/storage, e.g.). This would be invaluable for training persons new to the program.

4) Strongly recommend revising the City's current IU inspection form (Atch. A-1). During the file review it was discovered the inspections lacked detailed information on the IUs' processes/pretreatment equipment (leaks, rusting, scale build-up, good/bad preventive maintenance, concrete floor etching, etc.); had vague chemical/haz waste storage and nothing regarding handling procedures. The City should add a few more paragraphs to include these particular areas to "evaluate" during an inspection. See "Audit Checklist's IU File Review, Section 9.a. through 9.q."

If the above inspection Checklist items were to have been adequately addressed and documented, the City's inspections would have been deemed more than 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 chemistry changes made since the last inspection?" Any changes could be "red-inked" on the work copy, then updating their base inspection form for use in future inspections.

It is also recommended to include questions asking about P2 practices: source reduction, waste reduction, in-situ chemical/water recovery (wet air scrubbers at Jan-EZE, e.g. for chromic acid re-use and rinse water reclamation for reuse), in-house Best Management Practices (BMPs), ISO 140001 certified, water and/or energy conservation measures.

- 5) Recommend including the above P2 questions on all IU surveys and permit applications.
- 6) Recommend sending out fliers or writing public service notices to the City's local newspaper regarding the problems caused by disposing of grease down the sink and non-dispersibles (wet wipes, e.g.). 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.
- 7) Recommend acquiring the more nationally utilized Micro-Soft (MS) software on the City's Pretreatment Coordinator's work computer. Currently, the City Coordinator cannot receive MS Word documents and may be missing some valuable Pretreatment related information from just the State's "listserve".
- 8) Recommend stamping received date initializing ALL correspondence sent in by any non-domestic user, not just the (currently) one Metal Finisher. In some cases, this received date may be the "start date" for enforcement actions.
- 9) Recommend defining what the City means by a "24 hr composite" in its permit(s). They can be either time-composites or flow proportioned composites. It is not clear in the existing Metal Finisher's permit.
- 10) Recommend sending out the hazardous waste notification requirement in 40 CFR 403.12(p) to all of the haz waste generators connected to the City's collection system. The latest ADEQ generators' list was provided to the City's Pretreatment Coordinator during the audit. The mail-out should also sent to all healthcare related facilities as many of them generate hazardous waste, but are not tracked by ADEQ.
- 11) Recommend sending Husqvarna a formal notice they're required to submit a Baseline Monitoring Report (BMR) or the City's permit application [if it has all the requirements in 40 CFR 403.12(b)(1-7)] "at least 90 days prior to commencement of discharge [of regulated wastewater]".

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) Under *40 CFR 403.9(b)(2)* Submit "...a [signed/dated] statement reflecting the endorsement or approval of the local boards or bodies responsible for supervising and/or funding the POTW Pretreatment Program...". [Repeat requirement from 2/12 Audit]

Whether through oversight by this office or misplacement, this resolution cannot be located in the City's current Program.

2) Include in the City's Pretreatment Program's Enforcement Response Plan's Enforcement Response Guide a series of enforcement options for violations of Best Management Practices (BMPs). The revised one this office has does not mention BMP violations or enforcement options.

3) Submit in a three-ring notebook the entirety of the City's revised Pretreatment Program. This office has bits and pieces of what's been submitted, but many are labeled as Sections while the old Program has "exhibits" and am unsure where the Sections are to be placed. This submittal may conclude the decision Nashville's Pretreatment Program is current with the Streamlining provisions in 40 CFR 403.

* * * * *

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 Coordinator
 Address: 426 North Main Street
 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: 2/23 - 2/25/16
 (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>
<u>Larry Dunaway</u>	<u>Public Works Director (exit interview)</u>	

* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</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: _____

.....

Nashville's Program and industry make-up is essentially the same since the last audit conducted in February 2012.

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	7/1/14	6/30/19

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- 3.5 MGD; Actual (Avg)- 1.7 MGD

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

Industrial Contribution to this Treatment Plant

of SIUs: 2* # of CIUs: 2 (*One not yet operational)

Industrial Flow (mgd): ~0.02 Industrial Flow (%): 0.01 %

Level of Treatment

Type of Process(es):

Primary	<input checked="" type="checkbox"/>	<u>Two aerated basins; two clarifiers;</u>
Secondary	<input checked="" type="checkbox"/>	<u>sludge belt press; RAS pump station;</u>
Tertiary	<input type="checkbox"/>	<u>WAS pump station; post aeration basin</u>

Method of Disinfection: UV

Dechlorination: No

Effluent Discharge

Receiving Stream Name: Mine Creek, Millwood Lake then to the Red River

Receiving Stream Classification: Segment 1C, Red River Basin

Receiving Stream Use: Primary contact recreation; raw water source for public, industrial and AG uses; propagation 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 II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c) (3)]

Have any non-substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.

1. Modifications:

<u>Date Approved by ADEQ</u>	<u>Ordinance Citation/ Nature of Modification</u>	<u>Date Incorporated in NPDES Permit</u>
<u>7/12/12</u>	<u>Pretreatment Ord. #919 passed 8/28/12 to be current w/CFR 403 Streamlining legal authority</u>	<u>n/a</u>
_____	_____	_____
_____	_____	_____

2. Modifications in Progress:

Date Requested _____ Nature of Modification _____
Program mods started being submitted in 2/12 thru 2/14 (TBLL eval).
These piecemeal submittals have not been reviewed for final approval.

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
 Date of most recent Ordinance approved by the Control authority: 8/28/12
 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 (P²) policies by contributing jurisdictions?

List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

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

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 P² activity _____
- Analysis of samples _____
- Enforcement _____
- Other: _____

Briefly describe other problems: _____

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

IU Name	Problem	NPDES Permit Violation	
		Yes	No
n/a			

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *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 P² 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 P² activity and the distribution of P² 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>Name of IU</u>	<u>Type of Industry</u>	<u>Is the IU Permitted?</u>
<u>Husqvarna</u> <u>(not in full operations yet)</u>	<u>Metal Finisher</u>	<u>No</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)
 - b. 2* Categorical Industrial Users (CIUs) * Husqvarna not in full operations yet.
 - 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:

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 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

- Does Control Mechanism designate a discharge point? [403.5 (b) (8)]
 Are all applicable categorical standards and local limits applied to trucked wastes?

List all pollutants and applicable limits, other than local limits and categorical standards, that are applied to waste haulers:

Pollutant	Limit
n/a	

Describe the discharge point(s) (including security procedures):
n/a

- 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?

<input type="checkbox"/> 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	<input type="checkbox"/> Other _____

YES NO

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

If yes, complete the information below:

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

YES NO

Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [403.5(c)(1); 403.8(f)(4)]
**The TBLs were calc'd based on the only SIU (a Metal Finisher) in town.*

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		4/10 CEA Calc'd MAHL / MAIL / TBL (lb/d) / mg/L
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.39 / 1.25 / 7.14
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.11 / 0.44 / 0.25
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	13.9 / 12.44 / 7.1
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.73 / 1.17 / 6.7
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.33 / -0.4 / -2.2
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.41 / 0.33 / 1.89
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.014 / 0.12 / 0.071
Molybdenum (Mo) *	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4.61 / 4.0 / 22.9
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.2 / 0.18 / 1.03
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.08 / 0.075 / 0.43
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4.18 / 2.37 / 13.54

* - If necessary for the sludge disposal option chosen.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

YES NO

✓* 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? *CEA's use of "NDs" to arrive at TBLs questionable.

TYPE OF ALLOCATION

	Uniform Concentration	Mass	Hybrid
Arsenic (As)			
Cadmium (Cd)			
Chromium-Total			
Copper (Cu)			
Cyanide (CN)	✓		
Lead (Pb)	✓		
Mercury (Hg)			
Molybdenum (Mo)			
Nickel (Ni)			
Selenium (Se)	✓		
Silver (Ag)			
Zinc (Zn)			

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants? n/a

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

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

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 ?
 [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
**BMP violations are not addressed in the ERP/ERG*
- ✓ 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> <u> </u> Notice or letter of violation | <u> ✓ </u> <u> </u> Administrative Order |
| <u> ✓ </u> <u> </u> Setting of compliance schedule | <u> </u> <u> </u> Revocation of permit |
| <u> ✓ </u> <u> </u> Injunctive relief | <u> ✓ </u> <u> </u> Fines (maximum amount): |
| | civil \$ <u> 1000 </u> /day/violation |
| | criminal \$ <u> 1000 </u> /day/violation |
| | administrative \$ <u> </u> /day/violation |

- ✓ Imprisonment
- ✓ Termination of Service
- Other: _____

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

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

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 _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Pass through _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Fire or explosions? _____
(incl. flash point viol.) |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Corrosive structural damage? _____
(incl. pH <5.0). |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Flow obstructions? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Excessive flow _____
or pollutant _____
concentrations? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Heat problems? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Interference due to _____
oil or grease? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Toxic fumes? _____ |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Illicit dumping of _____
hauled 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)] |

0 How many SIUs are currently on compliance schedules?

Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

Indicate the number of SIUs from which penalties have been collected by the Control Authority during the past Pretreatment reporting period:

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	<u>\$</u> _____
Administrative	<u>0</u>	<u>\$</u> _____
Total	<u>0</u>	<u>\$</u> _____

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

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?
 "Turned over to City attorney."

Are there significant public or community issues impacting the POTW's pretreatment program?
 If yes, please explain: _____

_____ Are all records maintained for at least 3 years?

K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] * - FTE = Full Time Equivalent Employee

 < 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	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 & 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

I. 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 February '12 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? No*. 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 and other industrial equipment cylinders
Industrial Category Metal Finishing 40 CFR 433.17 SIC/NAICS Codes: 3471/332813

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

Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name *Husqvarna File/ID No. N/A
Industry Address #1 Poulan Dr.
Industry Description *Nickel plating of small engine cylinder/pistons
Industrial Category Metal Finishing 40 CFR 433.17 SIC/NAICS Codes: 3425

Avg. Total Flow (gpd) 0* Avg. Process Flow (gpd) 0*

Industry visited during audit: *YES

Comments: *Facility has some problems with its equipment set-up. Computerized hoists are not working properly for plating. Facility visited to view equipment layout and discuss future processes

FILE #: _____ 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 #: _____ 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?	✓	✓*	_____	_____	_____
2. Is the user subject to categorical pretreatment standards?	✓	✓	_____	_____	_____
a. New source or existing source (NS or ES)?	NS	NS	_____	_____	_____
b. Is this IU one identified as having P ² potential?	✓	✓	_____	_____	_____

B. Control Mechanism

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

Comments: 1) 2/yr for CFR 433 metals except for Cr & Ni (quarterly) & TTO states "once/5 year permit"; 2) Facility's permit application and permit were revoked because the facility asked for numerous extensions. It was apparent to the City Coordinator the IU was not ready for production (See Atatch. A-2); 3) See Feb. '12 Audit example. It needs much more concise pertinent IU information.

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

Comments: 1) City uses the term "termination"; 2) It will be.

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>--</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>--</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>--</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>--</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>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
b. Sample date and time?	<u>✓</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
c. Sample type?	<u>✓</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
d. Wastewater flow at the time of sampling?	<u>✓</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
e. Sample preservation procedures?	<u>✓</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
f. Chain-of-custody records?	<u>✓</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<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>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>1</u>	<u>--</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>--</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-1 for example)</u>	<u>✓</u>	<u>--</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>3/15</u>	<u>--</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>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>2</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
f. Evaluation of pretreatment facilities?	<u>2</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>no</u>	<u>--</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/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) General in nature. Could have more comprehensive narrative in some areas.

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 discharge control plan & need to develop? [403.8(f)(2)(v)]	✓	--	_____	_____	_____
i. Manufacturing facilities?	1	--	_____	_____	_____
j. Chemical handling and storage procedures?	3	--	_____	_____	_____
k. Chemical spill prevention areas?	✓	--	_____	_____	_____
l. Hazardous waste storage areas and handling procedures?	3	--	_____	_____	_____
m. Sampling procedures?	✓	--	_____	_____	_____
n. Laboratory procedures?	n/a	--	_____	_____	_____
o. Monitoring records?	4	--	_____	_____	_____
p. Evaluation of Pollution Prevention opportunities?	no	--	_____	_____	_____
q. Control Authority inspector signature?	2	--	_____	_____	_____

IU Self-Monitoring and Reporting

10. Does the file contain self-monitoring reports?	✓	--	_____	_____	_____
11. Does the file include:					
a. BMR?	✓	--	_____	_____	_____
b. 90-Day Report?	✓	--	_____	_____	_____
c. All periodic reports?	✓	--	_____	_____	_____
d. Compliance schedule reports?	n/a	--	_____	_____	_____
12. Did the IU report on all required parameters?	✓	--	_____	_____	_____

Comments: 1) Very general/vague in nature; 2) Suggest having facility rep's signature on the inspection reports also; 3) Chemical storage/handling descriptions non-existent; 4) Nothing noted in inspections about the facilities own monitoring records which have to be kept on-site for a minimum of 3 years.

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>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
14. Did the IU report flow?	<u>✓</u>	<u>--</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>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>1</u>	<u>--</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>--</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>--</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>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
b. IU self-monitoring results?	<u>n/a</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

comments: 1) Slug potential determined to be low; therefore, no slug control plan was required. See Attch. A-3 for Slug Potential Evaluation.

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>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>--</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>--</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>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/n</u>	<u>--</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>--</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>--</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	✓	--	_____	_____	_____
b. TRC	✓	--	_____	_____	_____
c. Pass through/Interference	✓	--	_____	_____	_____
d. Spill/slug loads	✓	--	_____	_____	_____
e. Reporting	✓	--	_____	_____	_____
f. Compliance schedule	✓	--	_____	_____	_____
g. others (specify)	_____	_____	_____	_____	_____
13. Was the SIU published for SNC?	n/a	--	_____	_____	_____
Date of publication.	--	--	_____	_____	_____

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Nashville NPDES #: AR0021766

Date of Audit: 2/23 - 2/25/16 Date entered into ICIS: 4/19/16
(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
NO	Other violations of concern	II

SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

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**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, 870.845.5168

Type of industry: Metal Finisher Date/Time of visit:
CFR 433.17 2/24/16 / 10:10 a.m.

Industry contacts: John Anderson-Env/Safety Eng.

	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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Pretreatment equipment maintained and operational?	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Appropriate self-monitoring procedures/equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/> *	<input type="checkbox"/>	<input type="checkbox"/>

*IU has implemented numerous P2 practices.

Additional comments: Facility has not changed its operations or pretreatment since the February '12 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 valves/hydraulic cylinders. 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 baths and water in their rinses. Some fresh water has to be added to some of their final rinses. Since installation of the CAST unit they're down to 66 bags from 330 bags (cubic yards)/yr to haul off as haz. waste.

Visit conducted by: Gilliam/Carlyle Date: 2/24/16



(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, mechanical & cartridge 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.

Visit conducted by: Gilliam/Carlyle Date: 2/24/16



(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:

Husqvarna Group, #1 Poulan Drive, 870.845.6771

**Facility not in full operations yet.*

Type of industry: Metal Finisher Date/Time of visit:

CFR 433.17

2/25/16 / 9:35 a.m.

Industry contacts: John Wesson, Safety & Env. Manager & Robin Bogin, Plating Mgr and Chemist

	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>	___	___

Additional comments:

Facility was visited to observe their Ni plating lines which were not operational yet. Problems with the computerized hoist system kept them from being fully functional. Facility will begin Ni plating (electro and electroless) when German system is functional.

Visit conducted by: Gilliam/Carlyle Date: 2/25/16

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: Huqvarna

Additional comments:


The two lines will have counterflowed rinses. In-line cartridge (1 μ m fiber) filters will also be used on the "work" tanks to increase longevity. All tanks will be heated except for most of the rinses. The "back" rinse tank and the rinse prior to actual plating process will not be heated.

For the aluminum parts, a Zn layer (not mentioned if Zn phos or Zn plating) is placed 1st then Ni plating followed by rinses.

The steel pistons are electroless plating and more precise because of minute thickness that has to be achieved. The aluminum cylinder line is electroplated Ni which leaves a much thicker layer of Ni which can be honed to desired thickness. All drains and sumps will drain or be pumped to typical chemical precipitation system using an anionic polymer. Alkaline and acidic based wastewater will be flowed to a separate tanks in their treatment process.

Since the facility was not in production and only de-I water was flowing to keep entire system clean or "open", a more comprehensive site visit could not be conducted/documentated although every piece of equipment on the two lines were new with no leaks observed and overall containment was very adequate. Facility reps were more than open in their descriptions of what was to be conducted and were familiar with their Federal Metal Finishing standards.

Visit conducted by: Gilliam/Carlyle Date: 2/25/16



(signature of auditor conducting visit)

Attachment A-1

CITY OF NASHVILLE

426 North Main
Nashville, AR 71852

Industrial Waste Pretreatment Inspection Report

Inspection Date: 3/3/2015 Inspection Time: 9:00

I. Type of Inspection

Scheduled Unscheduled Demand

II. General Information

Company Name	JAN-EZE PLATING				
Parent Company or affiliation					
Company mailing address (list below)	Company street address (list below)				
100 MISSION DRIVE					
NASHVILLE, AR					
71852					
Year operations began	1986				
Name of authorized representative	LARRY FRANAPPEL				
Title or position	PLANT MANAGER				
Telephone #	870-845-5134				
Name of pretreatment contact	ED CARLYLE, JR.				
Title or position	PRETREATMENT COORDINATOR				
Telephone #	870-845-4522				
Company personnel present at inspection (list below)					
Name:	JOHN ANDERSON	Title:	ENVIRONMENTAL		
Name:		Title:	SAFETY MANAGER		
Name:		Title:			
No. of employees	35	No. of shifts:	3	Days/week	5

FIRST INSPECTION
2015

III. Product or Service Information

Description of primary manufacturing or service activities:

NICKEL (ELETROPLATING) OF HUSQUARNA LAWN PRODUCTS ON PISTONS FOR LAWN BLOWERS, WEED EATERS, CHAIN-SAWS CHROME PLATING OF CHAIN-SAW CYLINDERS. THEY ALSO HAVE A STEEL CYLINDER LINE ON HUGH CYLINDERS USED ON CATERPILLER AND CHROME WESCO WATER AND WASTEWATER VALVES.

Principal raw material used:

CHROME, NICKEL, ACIDS, POLYMERS

Principal products produced:

-NA-

List all processes occurring at facility:

HONING	NEUTRALIZATION
CHROMATIC	HEATING
POLISHING	CLEANING
WASHING	
RINSING	

IV. Water Source Information

Water Supply:

X	Public Water Supply	Account #	06-5130 06-5140
	Private well	Location:	LEFT OF PLANT,
	Surface water	Location:	OUT FRONT

| YARD | FACTOR

IV. Water Source Information Cont.

Is water treatment or conditioning unit utilized? Yes No

If yes, please describe unit:

-NA-

Is water supply metered? Yes No

If yes, give name of person or company metering water suely: _

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

Average Daily Water usage: _____
 How was water usage obtained: _____

v. Wastewater Information

Source Information		
Source	Volume (GPD)	Discharge Method

Discharge Classification			
<input checked="" type="checkbox"/>	Categorical Waststream	40 CFR	433.17
<input type="checkbox"/>	Existing Source (PSES)		
<input checked="" type="checkbox"/>	New Source (PSNS)		
<input type="checkbox"/>	Other		
<input type="checkbox"/>	Local Standards (Non-Categorical Waststream)		

A-1c

V. Wastewater Information Cont.

Is IU on production-based standards?		
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	N/A
If yes, specify annual production rate:		

Sampling Information:

Number of outfall(s) 1 - TO MANHOLE ACROSS THE STREET.

Describe location of outfall(s):

SAMPLING POINT MARKED NA003 IN ORANGE BELOW FLOCCULATION TANK. HAS CAPACITY TO BE LOCKED DURING SAMPLING

Is the outfall representative of the operation?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	N/A
---	-----------------------------	-----

Is the combined wastestream formula employed?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	N/A
------------------------------	--	-----

Are wastestreams metered?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	N/A
---	-----------------------------	-----

If yes, describe flow metering device:

A MAGNETIC FLOW DEVICE PRODUCED BY BLUE WHITE INDUSTRIES.

Is meter calibrated?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	N/A
------------------------------	--	-----

If yes, how often?

ONLY CLEANED WHEN NOT WORKING

Are calibration records available?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	N/A
------------------------------	--	-----

Is a certified laboratory used for wastewater analysis?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	N/A
---	-----------------------------	-----

If yes, give name and address of laboratory?

RINECO ANALYTICAL INDUSTRIES
819 VULCAN ROAD - HASKELL
BENTON, AR
72105

A-1d

VI. Pretreatment

Does the IU have pretreatment technology?

Yes No N/A

If yes, describe method of treatment.

NO NEW TECHNOLOGY HAS BEEN INCORPORATED SINCE THE LAST INSPECTION

Does the IU require a licensed operator for its pretreatment system?

Yes No N/A

If yes, give classification:

JOHN ANDERSON - CLASS THREE WASTEWATER
OTHER IN WASTEWATER CLASS I'S AND II'S.

Is the IU operating under a compliance schedule to install pretreatment technology or otherwise attain compliance with applicable standards?

Yes No N/A

If no, is the IU in compliance with applicable standards?

Yes No

Does IU generate any sludge or residuals as a result of its pretreatment operation?

Yes No N/A

If yes, describe:

SLUDGE COMES FROM FLOCCULATION TANK
TO FILTER PRESS
TO FURNACE DRYER
TO TOTES IN EAST SECTION OF PLANT
TO COMPANY IN

VI. Pretreatment Cont.

How does the IU dispose of sludge or residuals?		
SEE LAST (PAGE 5) ON OPPOSITE PAGE		
Are waste manifest available?		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(If yes, attach copy of latest manifest to inspection report.)		

VII. Environmental Control Permits

Is facility connected to POTW?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
--------------------------------	---	-----------------------------

Facility held permits:		
Local POTW?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, type of permit:	WASTEWATER DISCHARGE PERMIT AR00(NA003)	
Permit No.:	NA003	
RCRA?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
EPA ID #:		
Generator?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Storage > 90 Days	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Treatment	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Storm water permit?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Permit No.:		
Any other permits?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please describe:	BOILER PERMIT 89699 AR 69612 AR 92067 AIR EMISSION PERMIT 1937 AR-3 STORM WATER AR00000000	

VIII. Waste Generation / Accidental Spill Prevention (ASP)

Does IU generate any waste process material such as spent solvents, acids, oils, etc.?

Yes No N/A

If yes, classification of waste:

Description of Waste	Quantity Generated	Disposal Method
	-NA-	

Does IU have a designated or centralized area for the storage of hazardous waste?

Yes No N/A

If yes, please describe location of storage area:

SEE SCHEMATICS - BACK OF PLANT

Is this area located near a sanitary sewer drain?

Yes No N/A

Is the material that is being stored protected by any type of containment structure?

Yes No N/A

If yes, please describe type of containment structure:

THERE IS A 6" BERN (NOT 4") AROUND PLANT.

VIII. Waste Generation / Accidental Spill Prevention (ASP) Cont.

Give name and address of hazardous waste hauler(s):		
NEXEO - SEE MANIFEST		
Are waste manifest submitted to POTW?		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does the IU generate any residuals (scrap metal, paper products, etc.) as a result of its operation?		
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
If yes, please describe:		
- NA -		
How is waste product disposed of:		
- NA -		
Does IU have an ASP Plan?		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is the ASP plan in effect?		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Date that ASP plan was submitted to POTW:		JULY 2011
Does IU have spill notification procedures posted?		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does IU follow ASP procedures during an accidental spill event?		
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Comments:		

A-14

VIII. Waste Generation / Accidental Spill Prevention (ASP) Cont.

Date of last accidental spill event:	JULY 1999		
Date IU last revised ASP plan:			
Does IU keep records of accidental spill events?			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	N/A	
Comments:			
Has IU submitted MSDS on all products used within facility?			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	N/A	
Are these products identified in the IU's ASP Plan?			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	N/A	

IX. Slug Control

Does IU have a slug control plan?			
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	N/A	
If yes, is a copy of the IU's slug control plan on file with the POTW?			
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/>	N/A
Date slug control plan was submitted:			

Does the IU's slug control plan address the following:			
Describe discharge practices?			
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/>	N/A
Describe non-routine batch discharges?			
<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/>	N/A
Procedures for notifying the POTW of any accidental or slug discharge?			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	N/A	
Description of stored chemicals?			
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	N/A	

STORAGE ROOM RIGHT SIDE OF PLANT DIRECTLY
AFTER STEEL PLATING ROOM.

IX. Slug Control Cont.

Procedures to prevent adverse impact from accidental spills, which include:	
<input type="checkbox"/>	Inspection and maintenance of storage areas
<input type="checkbox"/>	Handling and transfer of materials
<input type="checkbox"/>	Loading and unloading operations
<input type="checkbox"/>	Control of plant site run-off
<input type="checkbox"/>	Worker training
<input type="checkbox"/>	Building of containment structures or equipment
<input type="checkbox"/>	Measures for containing toxic organic pollutants including solvents
<input type="checkbox"/>	Measures and equipment for emergency response

Inspection observations of process areas including pretreatment system(s) :			
Cleanliness:			
<input checked="" type="checkbox"/>	Good	<input type="checkbox"/>	Fair
<input type="checkbox"/>		<input type="checkbox"/>	Poor
Containment Structures:			
<input checked="" type="checkbox"/>	Good	<input type="checkbox"/>	Fair
<input type="checkbox"/>		<input type="checkbox"/>	Poor
Storage Areas:			
<input checked="" type="checkbox"/>	Good	<input type="checkbox"/>	Fair
<input type="checkbox"/>		<input type="checkbox"/>	Poor
Slug potential:			
<input checked="" type="checkbox"/>	High	<input type="checkbox"/>	Medium
<input type="checkbox"/>		<input checked="" type="checkbox"/>	Low
Comments:			
6" BERM AROUND ENTIRE OPERATION EXCEPT OFFICES			
Does the IU need a slug control plan?			
<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No

A-13

X. Pollution Prevention

Have any changes been made to reduce or eliminate any wastewater discharge?

Yes No N/A

If yes, please describe:

THEY HAVE IN THE PAST - BARE MINIMUM NOW

List all operations that are currently considered closed loop:

-NA-

Have any operating practices been improved?

Yes No N/A

If yes, please describe:

NO NEED AT THIS TIME

XI. Inspector Comments:

Describe all deficiencies noted during this inspection:

THE PRODUCTION OF MATERIALS WHICH ARE COATED HAS REDUCED BECAUSE OF PARENT PRODUCTION. TIMES ARE COMING NEAR A RECESSION, BUSINESS ISN'T WHAT IT USE TO BE.

Describe all recommendations made during this inspection:

KEEP A GOOD WATCH ON CHAIN OF CUSTODY'S SEEMS LIKE WE ALWAYS MESS UP ON THOSE. LET ME KNOW OF ANY SHIFT CHANGES, SHUTDOWNS. NEED COPIES OF MANIFEST SHIPPING OF HAZARDOUS WASTE CALIBRATION RECORDS OF FLOW METER

Please attach to this inspection report a complete narrative description of all manufacturing activities occurring at this facility.

Inspector's Name	Ed Colston Sr.
Date:	3/4/2015

IT SHOULD BE NOTED THAT CHIP COLSTON SHOULD HAVE FILED OUT THIS REPORT FOR TRAINING PURPOSES, BUT TOO BUSY WITH HIS OWN JOB.

Attachment A-Z



#1 Poulan Drive
Nashville, AR 71852
Phone (870) 845-1234
FAX (870) 845-6700

January 12, 2016

Dear: Mr. Ed Carlyle
Permitting Officer for City POTW:

Husqvarna Forestry Products, #1 Poulan Drive would like to ask for a fourth 90 day extension to its 90 day compliance certification for discharge of waste water issued on 1/26/2015 in accordance with Nashville City Ordinance 919.

The system is still under construction which has moved the schedule out and not allowed us to run in sufficient quantities to have a proper analytical sample pulled for testing compliance to date. We have had multiple problems with the mechanical systems and unable to run our efficiency tests. We are still in the process of having ghost runs (carriers with no parts and using no chemicals) to effectively test our system.

We will advise when these problems are fixed and we are ready to run production.

Please reply back to John Wesson, EHS Manager or myself by e-mail or letter with response.

Thanks,

A handwritten signature in black ink that reads 'Robin Bogan'.

Robin Bogan
Plating Manager/Chemist
Husqvarna Forestry Products, N.A. Inc.
One Poulan Drive
Nashville, AR. 71852
1-870-845-1234
robin.bogan@husqvarnagroup.com





#1 Poulan Drive
Nashville, AR 71852
Phone (870) 845-1234
FAX (870) 845-6700

January 12, 2016

Re: 90 Day Extension for 90 day compliance certification

Dear Sir:

Please acknowledge by signing this document that you have received the request for a fourth 90 day extension to Husqvarna Forestry Products 1 Poulan Drive Facility 90 day compliance certification for waste water discharge.

City of Nashville
Permitting Officer
or designated signee:

Ed Carlyle Sr.

Date: 01-14-16

John Wesson
EHS Manger
Husqvarna Forestry Products, N.A. Inc.
One Poulan Drive
Nashville, AR. 71852
1-870-845-6771
John.h.wesson@husqvarmagroup.com

Husqvarna Forestry Products- North America

A-26



#1 Poulan Drive
Nashville, AR 71852
Phone (870) 845-1234
FAX (870) 845-6700

October 14, 2015

Dear: Mr. Ed Carlyle
Permitting Officer for City POTW:

Husqvarna Forestry Products, #1 Poulan Drive would like to ask for a Third 90 day extension to its 90 day compliance certification for discharge of waste water issued on 1/26/2015 in accordance with Nashville City Ordinance 919.

The system is still under construction which has moved the schedule out and not allowed us to run in sufficient quantities to have a proper analytical sample pulled for testing compliance to date. We have had multiple problems with the mechanical systems and unable to run our efficiency tests. We are still in the process of having ghost runs (carriers with no parts and using no chemicals) to effectively test our system.

We will advise when these problems are fixed and we are ready to run production.

Please reply back to John Wesson, EHS Manager or myself by e-mail or letter with response.

Thanks,

A handwritten signature in cursive script that reads 'Robin Bogan'.

Robin Bogan
Plating Manager/Chemist
Husqvarna Forestry Products, N.A. Inc.
One Poulan Drive
Nashville, AR. 71852
1-870-845-1234
robin.bogan@husqvarnagroup.com

Faint text in the top left corner, possibly a header or reference number.

Faint text in the top right corner, possibly a date or stamp.

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#1 Poulan Drive
Nashville, AR 71852
Phone (870) 845-1234
FAX (870) 845-6700

July 14, 2015

Dear: Mr. Ed Carlyle
Permitting Officer for City POTW:

Husqvarna Forestry Products, #1 Poulan Drive would like to ask for a second 90 day extension to its 90 day compliance certification for discharge of waste water issued on 1/26/2015 in accordance with Nashville City Ordinance 919.

The system is still under construction which has moved the schedule out and not allowed us to run in sufficient quantities to have a proper analytical sample pulled for testing compliance to date. We have had multiple problems with the mechanical systems and unable to run our efficiency tests. We are still in the process of having ghost runs (carriers with no parts and using no chemicals) to effectively test our system.

We will advise when these problems are fixed and we are ready to run production.

Please reply back to Richey LaGrone, Environmental Coordinator or myself by e-mail or letter with response.

Thanks,
Robin Bogan
Plating Manager/Chemist
Husqvarna Forestry Products, N.A. Inc.
One Poulan Drive
Nashville, AR. 71852
1-870-845-1234
robin.bogan@husqvarnagroup.com

Husqvarna Forestry Products- North America

A-2d

100

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF CHEMISTRY
5800 S. UNIVERSITY AVENUE
CHICAGO, ILLINOIS 60637

TO: THE DIRECTOR, NATIONAL BUREAU OF STANDARDS
4300 RESISTANCE AVENUE
GAITHERSBURG, MARYLAND 20899

FROM: DR. J. H. GOLDSTEIN
DEPARTMENT OF CHEMISTRY
UNIVERSITY OF CHICAGO

SUBJECT: NMR SPECTRA OF POLYMER SOLUTIONS
DATE: JANUARY 1968

Enclosed are two copies of a report on the NMR spectra of polymer solutions. The report is divided into two parts. The first part describes the experimental conditions and the results obtained. The second part discusses the interpretation of the spectra and the effect of various factors on the observed phenomena.

Attachment A-3

CITY OF NASHVILLE

**426 NORTH MAIN
NASHVILLE, AR 71852
870-845-4015 FAX: 870-845-7409**

December 15, 2015

**Jan-Eze Plating
100 Mission Drive
Nashville, AR 71852**


Attn: Mr. John Anderson

Re: Permit NA003, Slug/Spill Control Plan

Dear Mr. Anderson:

Every two (2) years the city must decide if your company is in the need of a slug control plan. It has been determined that since your company has a berm completely surrounding the parameter of your plant, and the large 5000 gal tank which wastewater can be re-routed to in case of an emergency, therefore, no spill plan or slug plan is needed at this time. If you feel that there is a need for such a plan, then contact me immediately. I have has some medical issues and am now in the process of training Chip Colston in pretreatment. As you know he has been on several inspections and we will let you know when the take over will be.

If you have any questions of concern, please call me at 557-3143.



**Ed Carlyle, Jr.
Pretreatment Coordinator**

cc: Pretreatment File – Jan-Eze Plating

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**

A-36

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

A-3c

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

Loading/Receiving Docks

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

Storm Sanitary Pretreatment XX Other

Specific Prohibitions (Nashville Sewer Ordinance)

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

9. Non-Routine Batch Discharges

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

A-3d

10. Non-Discharged Wastes

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

Type of Waste	Quantity per Year Generated	Disposal Method
---------------	-----------------------------	-----------------

- 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:

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

Ed Carlyle

Signature

7-7-2011

Date:

Pretreatment Coordinator

Title

A-3 f

MATERIAL SAFETY DATA SHEETS

04-7-11

- 1 OptiAid Plus Lone Step
- 2 Ammonium Hydrogendiflouride
- 3 Phosphoric Acid
- 4 Uniclean Soak HS
- 5 Soda Ash Light
- 6 Sodium Metabisulfite
- 7 Sodium Hydroxide (Caustic Soda)
- 8 Sulfuric Acid
- 9 Micromask
- 10 Microtape Cement
- 11 Nitric Acid
- 12 Aluminum Sulfate, Solid
- 13 Midfloc PW 1319E
- 14 Propane
- 15 Carbon Monoxide
- 16 Conoco Super Hydraulic Oil #32
- 17 CLR - Calcium and Rust Remover
- 18 Floor Patch Material - True Bond
- 19 Hydrochloric Acid
- 20 Activated Carbon
- 21 ACTIM & T 80 W Descaler
- 22 Kerosene
- 23 Oxygen
- 24 Acetylene
- 25 Gasoline
- 26 Heef 25 RS1
- 27 Mechanical/Cleaner #1
- 28 Chroma Ver 3
- 29 Fumetrol 140 Mist Suppressant
- 30 Hocut 795
- 31 Sodium Hydroxide .5 N Solution
- 32 Buffer Solution

- 33 M & T Sulfate Reducer (Barium)
- 34 Chromium Trivalent Standard Solution, 12.5 MG/LAS CR +3
- 35 Nichem 1100 B
- 36 LPS 2 Industrial Lubricant
- 37 Conoco Hydroclear Way Lubricant 68
- 38 Ni - 3 Nickel Iron Additive
- 39 Mineral Spirits
- 40 Solution "A" KSTS
- 41 Solution "B" KSTS
- 42 Solution N-75
- 43 Solution N-28
- 44 Sodium Thiosulfate .1 N Solution, .5 N Solution
- 45 Lube Solution for Federal Products Surfanalyzer Kit
- 46 Liquid Wax for Federal Products Surfanalyzer Kit
- 47 Cleaning Solution for Federal Products Surfanalyzer Kit
- 48 Sodium Bisulfite Solution
- 49 Chromic Acid
- 50 Nichem 1100 C
- 51 Solution R-79
- 52 Heef (R) 25 °C (Catalyst)
- 53 S-2250 Honing Oil
- 54 Potassium Iodide 10%
- 55 Caustic Soda Beads, Pels-Plus
- 56 HI - BILD Polyurethane (Paint)
- 57 Liquid Chlorine Bleach (Clorox Liquid Bleach)
- 58 Nichem 1100 A
- 59 Carborundum #12 Granules, Boiling Stones
- 60 Solution R-43
- 61 Solution N-73
- 62 Super 425
- 63 Alkeen 77 Alkaline Aluminum Etchant
- 64 Solution N-66
- 65 Indicator SC
- 66 Solution N-18
- 67 Indicator PTH

- 68 Indicator E
- 69 Hydrochloric Acid - 0.5N
- 70 Lexite - PS Aerosol
- 71 Electropure (R) 24 Nickel Sulfamate
- 72 AZO Violet Dye
- 73 Alkalume Preplate 499
- 74 Ferro Plate Hardner
- 75 Ferro Plate Brightener
- 76 Nichem 2500 - C
- 77 Kemtex (R) 88 NJ
- 78 Ammonium Hydroxide
- 79 Murexide Indicator Mix
- 80 EDTA Solution - .0575 M
- 81 B-9 Nickel Stripper
- 82 Nickel Carbonate
- 83 Methanol, GR
- 84 Nickel Sulfate Liquid
- 85 Nickel Chloride Liquid
- 86 Instant Nickel Carbonate
- 87 Boric Acid Power
- 88 3258642 BN-S1 (Boron Nitride)
- 89 Ammonium Chloride
- 90 Orange Power
- 91 Alconox Detergent
- 92 Quikrete Quikblast
- 93 Steel Wool
- 94 Hydrochloric Acid - 50%
- 95 Iodine Solution - .1 N
- 96 Starch Indicator
- 97 M & T (R) KRA Powder - Chrome Reducing Agent
- 98 Theraffin Pariffin
- 99 Ethyl Acctate, GR
- 100 Phosphorous Acid, Flake

- 101 Ferrous Sulfate All Grades
- 102 LEC-930
- 103 Nickel Additive Y-17
- 104 Niphos 966 Initial Concentrate 1
- 105 Niphos 966 Initial Concentrate 2
- 106 Niphos 966 Brightener 1
- 107 Hydrogen Peroxide 35% (all grades)
- 108 Act; M & T Wetter
- 109 InHibitex 98
- 110 Water Softening Compound
- 111 Buffer Solution pH1.0
- 112 Lithium Carbonate
- 113
- 114 CWT 37

Nickel Plating Solution - See the following:

Material Safety Data Sheets:

- #84 - Nickel Sulfate Liquid
- #85 - Nickel Chloride Liquid
- #87 - Boric Acid
- #88 - Boron Nitride Powder
- #89 - Ammonium Chloride
- #103 - Y-17 Nickel Additive
- #38 - NI-3 Nickel Iron Additive
- #82 - Nickel Carbonate
- #100 - Phosphorous Acid, Flake

ITEM NUMBER 03

ATTACHMENT A

A-3K

ON SITE MATERIALS

09-17-09

DESCRIPTION	LOCATION	AMOUNT ON-SITE AT ONE TIME	STORAGE TYPE	CONTAINMENT
Nitric Acid	Nitric Room & Chemical Storage Room	6000 gal.	Drum Tank	Curbed / Pit
Sulfuric Acid	Chemical Storage Room	550 gal.	Drum	Curbed
Liquid Sodium Hydroxide	Caustic Room	4000 gal.	Tank	Pit
Sodium Bisulfite Liquid	Warehouse	660 gal.	Drum	Curbed
Sodium Metabisulfite	Warehouse	1500 lbs.	Drum	Curbed
Heef 25	Warehouse	7200 lbs.	Drum	Curbed
Nichem 1100 B	Warehouse.	35 gal.	5 gal.	Curbed
Nichem 1100 A & C	Maintenance Shop	75 gal.	Drum	Curbed

A-32

Adequacy of Containment Structures

All storage areas at Jan-Eze Plating are contained. Types of containment include pits, four inch containment curbs and/or containment ditches.

Transportation areas, which consist of an unloading dock and an unloading ramp, are contained with a ditch.

These containment structures provide Jan-Eze Plating with a high capability for containment of substances that may be spilled or leaked.

ITEM NUMBER 10

ATTACHMENT C

A-3n

C.

Waste Stream	Disposal Technology	Quantity per Year Generated
Clean out of ditch debris	Stabilization / Landfill (Pollution Control)	2 - 55 gal drums
Chrome debris	Stabilization / Landfill (Pollution Control)	4 - 55 gal drums
Chrome Plate Tank Bottom	Stabilization / Landfill (Pollution Control)	2 - 55 gal drums
Honing Oil w/ Chrome	Fuel Blending (Pollution Control)	50 - 55 gal drums
Honing Oil w/ Stone	Fuel Blending (Pollution Control)	4 - 55 gal drums
Metal Hydroxides	Stabilization / Landfill (US Ecology)	72 cubic yard bags
Spent Sand / Sand Filters	Stabilization / Landfill (Pollution Control)	2 - 55 gal drums
Steel Stripping Solution	Stabilization / Landfill (Pollution Control)	12 - 55 gal drums
Strip Solution	Stabilization / Landfill (US Ecology)	12 - 55 gal drums
Water Softening Compound	Stabilization / Landfill (US Ecology)	2 - 55 gal drums

Jan-Eze Plating, Inc. uses Univar USA / Chemcare, Inc. for disposing of our hazardous waste.

A-30



John Anderson <janderson@janezeplating.com>

Semi-Annual

John Anderson <janderson@janezeplating.com>
To: mredcarlyle <mredcarlyle@yahoo.com>

Tue, Jan 12, 2016 at 8:19 AM

Dear Mr. Ed,

Here is Jan-Eze Plating, Inc. Semi-Annual Compliance Report for July to December. If you have any questions please feel free to call me at 845-5134. Please confirm receipt of this e-mail. Thanks.

-
John Anderson
Environmental/Safety Manager

Attachment A-4

DOC011216-01122016081215.pdf
146K

2015 Semi-Annual
Report
July to December

INDUSTRIAL USER SEMI-ANNUAL COMPLIANCE REPORTS

The General Pretreatment Regulations require categorical industrial users to report the results of self-monitoring of their regulated waste discharge to the Control Authority at least semi-annually. Section [403.12(e) (1)] of the regulations requires the following information:

- 1 Facility Name: Jan-Eze Plating, Inc
 Address: 100 Mission Drive
 City: Nashville State: AR
 Phone Number: (870) 845-5134 Zip Code: 71852
- 2 Facility Contact: John Anderson
 Title: Environmental/Safety Manager
 Phone Number: (870) 845-5134
- 3 Reporting Period: January to June _____
 July to December
- 4 Average Daily Flow of Effluent: .019 mgd
 Maximum Daily Flow of Effluent: .022 mgd
- 5 Were the Flows: Estimated:
 Measured: _____
- 6 Give an explanation or show documentation containing information of how the industrial user arrived with the flow rates.
- 7 List effluent parameters within the wastewater discharge permit and their limits. List in mg/L.

Parameter	Permit Limit	Parameter	Permit Limit
1 cadium	.07 mg/l ^m	2 chromium	2.77 mg/l ^D
3 copper	2.07 mg/l ^m	4 lead	.43 mg/l ^m
5 nickel	2.38 mg/l ^m	6 silver	.24 mg/l ^m
7 zinc	1.48 mg/l ^m	8 cyanide	.65 mg/l
9 TTO	2.13 mg/l	10 flow	(see prohibited regs)
11 PH	5-10	12 BOD	250
13 TSS	250	14 oil & grease	100
15		16	

A-46

Semi Annual Compliance Report

- 6 Daily flow of effluent figures are arrived at by using the gallons per month of water usage shown on the company's water bills, estimated average flow of water treatment system and an estimated 25 gallons per day per employee for sanitary sewer usage.

8 List the six month averages on parameter permitted.

Parameter	Six Month Average	Parameter	Six Month Average
1 cadium	.004 mg/l	2 chromium	.03 mg/l
3 copper	.20 mg/l	4 lead	.04 mg/l
5 nickel	.20 mg/l	6 silver	.007 mg/l
7 zinc	.25 mg/l	8 cyanide	.01 mg/l
9 TTO	0 mg/l	10 flow	23 gpm
11 PH	9.1	12 BOD	11 mg/l
13 TSS	23 mg/l	14 oil & grease	5 mg/l
15		16	

9 List any parameters which were in noncompliance during the reporting period.

Parameter	Limit	Result	Parameter	Limit	Result
1			2		
3	NONE		4		
5			6		
7			8		
9			10		

10 Give explanation on what was done to correct the noncompliance (such as: resample, accidental spill, slug load, operator error) and actions to correct the problems.

NONE

JAN-EZE PLATING, INC.
100 MISSION DRIVE
NASHVILLE, ARKANSAS 71852

Toxic Organic Management Plan

“Based on my inquiry of the person or persons directly responsible for managing compliance with the TTO limitations, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the Solvent Management Plan submitted to the permitting (or control) authority.”

John Anderson

Authorized Representative

1/08/2016

Date


Signature

A te

II. Statement of Certification

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

John Arden
Authorized Representative

Environmental/Safety Manager 11/11/16
Title Date

Larry Johnson
Qualified Professional

Vice President/General Manager 1-11-16
Title Date

This document was inspected and reviewed by the following pretreatment representative:

Signature

Title

Date