



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460
NPDES Compliance Inspection Report



Section A: National Data System Coding

Transaction Code	NPDES										yr/mo/day					Inspec. Type	Inspector	Fac Type							
1 N	2 5	3 A	R	0	0	2	1	7	7	6	11	12	0	6	0	4	1	7	17	18 P	19 S	20 1			
Remarks																									
A	F	I	N	3	1	-	0	0	0	3	6			H	O	W	A	R	D	C	O	U	N	T	Y
Inspection Work Days				Facility Evaluation Rating				BI	QA	Reserved															
67				69	70	N		71	N	72	N	73			74	75									80

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) City of Nashville Hwy 27 ~ 1/2 mile south of town	Entry Time /Date 0831 / 4-17-2006	Permit Effective Date November 1, 2003
	Exit Time/Date 1350 / 4-17-2006	Permit Expiration Date October 30, 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Ed Carlyle, Jr. / Pretreatment Coordinator / (870) 845-7402 (870) 557-0812 cell		Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Larry Dunaway / Public Works Director / (870) 845-4015 426 North Main Street Nashville, AR 71852		
Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

- Permit	- Flow Measurement	- Operations & Maintenance	- Sampling
- Records/Reports	- Self-Monitoring Program	- Sludge Handling/Disposal	- Pollution Prevention
- Facility Site Review	- Compliance Schedules	S Pretreatment	- Multimedia
- Effluent/Receiving Waters	- Laboratory	- Storm Water	- Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Name(s) and Signature(s) of Inspector(s) Shan Lynch	Agency/Office/Telephone/Fax ADEQ / District 12 / (870) 389-6970	Date April 25, 2006
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

+++++

Name of Municipality: City of Nashville

CSN Number: 31-00036

NPDES Permit Numbers: AR0021776

Program Tracked under NPDES Permit Number: AR0021776

Fact Sheet Preparation Date: NA

Date of Last PCI/Audit: Audit on June 28 -30, 2005

Date of Last Annual Report: NA

Name of Inspector: Shan Lynch

Date PCI Performed: April 17, 2006

Name, Title, and Telephone Number of Facility Representative:
Ed Carlyle, Jr. / Pretreatment Coordinator / (870) 845-7402

Name and Title of Other Participants: none

Number of IUs Visited: 2

Name(s) of IUs Visited: Aero, Inc. & Jan - Eze Plating

Note: AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

+++++

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. None
2. Has ADPC&E or EPA been notified of these changes? NA
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** yes
4. What procedures are being used to update the IU Survey?
Water dept. notifies Pretreatment Coordinator of new utility hookups; Newspaper; City council meetings; manhole inspections; phone book listings; chamber of commerce; city personnel
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 3
6. Number of Categorical Industrial Users: 3
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Federal regulations
8. List all categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (such as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
<u>Jan-Eze Plating</u>	<u>Metal finisher</u>	<u>Polishing, plating</u>
<u>Aero-Incorporated</u>	<u>Metal finisher</u>	<u>Electroplating</u>
<u>Electrolux</u>	<u>Metal finisher</u>	<u>Electrochemical deburring</u>
<u> </u>	<u> </u>	<u> </u>

B. LOCAL LIMITS

1. **IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADPC&E OR EPA?** The local limits were recently sent to Nashville Public Works (NPW) from ADEQ after being reviewed. The city is in the process of getting prior approvals to change City ordinances that include the new local limits in the pretreatment program.

2. Describe any apparent problems with the local limits. City is in a transition stage

2. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in Permit:	Program:	Comments:
Metals:				
influent	<u>4/year</u>	<u>4/year</u>	<u>4/year</u>	
effluent	<u>4/year</u>	<u>4/year</u>	<u>4/year</u>	
sludge	<u>2/year</u>	<u>none</u>	<u>none</u>	<u>CAO requires 2/year</u>
Organics:				
influent	<u>1/year</u>	<u>1/year</u>	<u>1/year</u>	
effluent	<u>1/year</u>	<u>1/year</u>	<u>1/year</u>	
sludge	<u>none</u>	<u>none</u>	<u>none</u>	

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective? The treatment plant experienced high CBOD problems possibly caused by and industrial discharge, however, this could not be proven. In response to this, the City has increased its pretreatment Industrial User inspections.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? yes, permit
2. How many IU permits (or other control documents) have been issued? 3
3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**

yes

4. Does the control document contain the following items?

An expiration date yes
Discharge limitations yes

If the program requires self-monitoring by the IUs, do the permits contain

IU self-monitoring requirements yes

IU reporting requirements yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

sample location yes
type of sample yes
monitoring frequency yes*
bypass prohibition yes
right of entry yes
nontransferability yes
revocation clause yes
penalty provisions yes
slug load notification yes
notification of process change yes

* Permit modifications have been sent to the IUs requiring them to sample 2/year.

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>2/month & 1/qtr</u>	<u>1/qtr</u>
other SIUs	<u>NA</u>	<u>none</u>
Inspection:		
categorical IUs	<u>2/year</u>	<u>1/year</u>
other SIUs	<u>NA</u>	<u>none</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? yes

3. Are inspections announced or unannounced? both; 1 scheduled and 1 announced

4. Are records kept of each inspection? yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection yes

Officials present yes

Inspection of chemical storage areas yes

Description of regulated processes, categorical wastestreams, and discharge location of these wastestreams yes

Inspection of the pretreatment facilities yes

Review of self-monitoring records No - S.M. records are not in the inspection report and are reviewed at the P.C office

Observation of IU self-monitoring procedures
Occasionally

Verification that approved analytical techniques are used Verified at office

Verification of IU flow measurement (where required) NA

6. Overall adequacy of inspection documentation: Satisfactory

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).
yes
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? yes
9. Are sampling and flow monitoring equipment properly maintained? yes
10. Is the POTW keeping proper field notes and chain of custody forms? yes
11. Is the sampling location representative of the discharge to the collection system? yes
12. Are sampling locations identified in POTW records?
yes
13. Are sampling services available in an emergency?
yes
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Each IU has a three ring binder containing all facility information and is arranged by separate section.
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?
yes
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? yes

17. What are the POTW's procedures for following up violations?
The IU is required to resample within 30 days, monitoring and sampling is performed by the City and an NOV is issued if necessary.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?
yes

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address
yes

Other environmental permits held
yes

Description of operations
yes

Process flow diagrams
yes

Flow measurements
yes

Measurements of regulated pollutants
yes

Certification of compliance by the IU
yes

Compliance schedule (if needed) NA

19. Additional comments on the POTW's inspection and sampling procedures:

E. ENFORCEMENT

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? yes, has increased enforcement procedures and fines.

2. How does the POTW respond to the following violations?

Effluent limitations NOV - NOV requires resampling with results submitted within 30 days; letter and phone call stating the NOV requirements

Late reports NOV

Unpermitted discharges NOV

Slug loads or spills fine, NOV

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)?

yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
<u>Aero-Inc.</u>	<u>high metals</u>	<u>NOV - \$2000</u>	<u>_____</u>
<u>Electrolux</u>	<u>slug load / o&G</u>	<u>NOV - \$1000</u>	<u>_____</u>
<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

5. Comments on the POTW's enforcement procedures:
satisfactory

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? yes
2. Are staffing levels adequate? yes
3. Are the responsible officials familiar with the approved program? yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: none
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? NA
3. Does the POTW have copies of permits for IUs in user cities? NA
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? NA
5. Comments on multijurisdictional issues: NA

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Aero-Incorporated

POTW Name: City of Nashville

Industry Contacts: Rick Cason

Date and Time of Visit: April 17, 2006 / 1221

Description of Manufacturing Process: Manufacture scissors from start to finish.

Sources of Process Wastewater: Vibratory finish and chrome and nickel electroplating.

Categorical Industry? yes

Basis for Limits: chrome

Point of Application: end of process

Description of Pretreatment Equipment and Procedures: Currently, this facility is not treating their wastewater; however, they are storing it in various containers around the shop and having it collected by truck and hauled to Texas for final disposal.

Spill Prevention and Solvent Management Procedures: This facility has no spill prevention or solvent management procedures.

Sampling Location and Equipment: Currently, this facility has no sampling equipment nor is sampling, due to a "no discharge".

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Jan-Eze Plating

POTW Name: City of Nashville

Industry Contacts: John Anderson / Environmental Manager

Date and Time of Visit: April 17, 1312

Description of Manufacturing Process: chrome and nickel plate pistons and cylinders for small engines in addition to various other items, large and small.

Sources of Process Wastewater: polishing the above parts

Categorical Industry? yes

Basis for Limits: chrome

Point of Application: end of process

Description of Pretreatment Equipment and Procedures: wastewater / spills to treating area via concrete channels / ditches. 2 streams; 1) concentrates and 2) rinse water. Both pH adjusted; chrome reduced by sodium bisulfite; pH adjusted; polymer added and heavy metals removed into filter press; water to sand filter then to City.

Spill Prevention and Solvent Management Procedures: berms and ditches to treating area

Sampling Location and Equipment: composite samples collected from secured collection tank prior to discharging to the City.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

INSPECTOR'S NAME	<u>Shan Lynch</u>	CODE
NAME OF FACILITY	<u>City of Nashville</u>	
PERMIT NUMBER USED TO TRACK PROGRAM	<u>AR0021776</u>	NPID
DATE OF PCI	<u>April 17, 2006</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS)	<u>3</u>	SIUS
NUMBER OF CATEGORICAL IUS	<u>3</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS	<u>2</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW	<u>0</u>	SNIN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code			NPDES										yr/mo/day				Inspec. Type	Inspector		Fac Type									
1	N	2	5	3	A	R	0	0	2	1	7	7	6	11	12	0	6	0	4	1	7	17	18	I	19	S	20	2	
Remarks																													
0	0	2	C																										
Inspection Work Days				Facility Evaluation Rating				BI		QA		Reserved																	
67				69	70	N	71	N	72	N	73			74	75														80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time /Date		Permit Effective Date	
Jan-Eze Plating 100 Mission Drive Nashville, AR 71852		1312 / 4-17-2006		November 1, 2003	
		Exit Time/Date		Permit Expiration Date	
		1340 / 4-17-2006		October 31, 2008	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
John Anderson / Environmental Manager / (870) 844-5134				IU	
Name, Address of Responsible Official/Title/Phone and Fax Number		Contacted			
John Anderson / Environmental Manager / (870) 844-5134 100 Mission Drive Nashville, AR 71852		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

-	Permit	-	Flow Measurement	-	Operations & Maintenance	-	CSO/SSO
-	Records/Reports	-	Self-Monitoring Program	-	Sludge Handling/Disposal	-	Pollution Prevention
-	Facility Site Review	-	Compliance Schedules	Y	Pretreatment	-	Sampling
-	Effluent/Receiving Waters	-	Laboratory	-	Storm Water	-	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Name(s) and Signature(s) of Inspector(s)			Agency/Office/Telephone/Fax			Date		
Shan Lynch			ADEQ / Dist. 12 / (870) 389-6970			May 4, 2006		
Signature of Reviewer			Agency/Office/Phone and Fax Numbers			Date		

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Jan-Eze Plating

Industry Contacts: John Anderson / Environmental Manager

Type of Industry: Chrome and nickel plating

Date of Visit: April 17, 2006

- | | | | |
|--|---|--|---|
| 1. Significant industrial user: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 3. Pretreatment equipment maintained and operational? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 4. Hazardous waste generated or stored? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 5. Proper solid waste disposal? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 6. Solvent management/TTO control? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 7. Suitable sampling location? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 8. Appropriate self-monitoring procedures / equipment? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 9. Adequate spill prevention? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 10. Industry familiar with limits and requirements? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |

Additional Comments: _____

Visit Conducted By: Shan Lynch Date: April 17, 2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 A R 0 0 2 1 7 7 6 11 12 0 6 0 4 1 7 17 18 I 19 S 20 2					
Remarks					
0 0 1 C					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N	72 N	73 74 75 80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Aero Incorporated 600 South Mill Street Nashville, AR 71852	Entry Time /Date 1221 / 4-17-2006	Permit Effective Date November 1, 2003
	Exit Time/Date 1258 / 4-17-2006	Permit Expiration Date October 30, 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Rick Cason / Safety Coordinator / (870) 845-4075	Other Facility Data IU	
Name, Address of Responsible Official/Title/Phone and Fax Number Freddy Brown / Plant Manager / (870) 845-4075 600 South Mill Street Nashville, AR 71852	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

-	Permit	-	Flow Measurement	-	Operations & Maintenance	-	CSO/SSO
-	Records/Reports	-	Self-Monitoring Program	-	Sludge Handling/Disposal	-	Pollution Prevention
-	Facility Site Review	-	Compliance Schedules	Y	Pretreatment	-	Sampling
-	Effluent/Receiving Waters	-	Laboratory	-	Storm Water	-	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This facility no longer discharges wastewater from their process line to the City of Nashville. All process water is collected in drums and transported out of State for final disposal. The collection areas and loading areas seem to be poorly maintained in the facility. The tumbling operation's closed loop process water, which is partly located outside, is overflowing onto the property grounds and running offsite.

Name(s) and Signature(s) of Inspector(s) Shan Lynch	Agency/Office/Telephone/Fax ADEQ 870-389-6970	Date May 4, 2006
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Aero Incorporated

Industry Contacts: Rick Cason / Safety Coordinator

Type of Industry: vibratory finish and chrome & nickel plating

Date of Visit: April 17, 2006

- | | | | |
|--|---|--|---|
| 1. Significant industrial user: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 3. Pretreatment equipment maintained and operational? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 4. Hazardous waste generated or stored? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 5. Proper solid waste disposal? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 6. Solvent management/TTO control? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 7. Suitable sampling location? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 8. Appropriate self-monitoring procedures / equipment? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 9. Adequate spill prevention? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 10. Industry familiar with limits and requirements? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |

Additional Comments:

* This facility no longer discharges process water to the City of Nashville

* Process wastewater is collected and hauled off for our State disposal. The sludge is considered hazardous and also hauled out of State.

* Water from the tumbling operation's closed loop system is being spilled onto the ground outside the facility. Runoff observed.

Visit Conducted By: Shan Lynch Date: April 17, 2006