ADEQ

A R K A N S A S
Department of Environmental Quality

September 1, 2009

Larry Dunaway
Public Works Director
Nashville Pubic Works
426 N. Main Street
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 June 16 though June 18, 2009. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the findings/deficiencies. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

The City appears to have personnel knowledgeable and interested in both the Pretreatment and Pollution Prevention Programs and their implementation. Many of the audit/assessment recommendations are meant to aide your Programs to further evolve in achieving the Clean Water Act's objectives to eliminate discharge of pollutants to the environment.

It was a pleasure working with your staff during the audit and becoming more familiar with the City of Nashville, its industries and Pretreatment and Pollution Prevention Programs. Mr. Ed Carlyle should be lauded for his cooperation and candidness during the event.

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

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
NPDES Pretreatment Coordinator

cc: Rudy Molina/EPA 6WQ-PP
Eric Fleming/NPDES Technical Assistance Manager
Cindy Garner/NPDES Technical Assistance Manager
E-Drive/Pretreatment Reports

# PRETREATMENT PROGRAM AUDIT/

# POLLUTION PREVENTION ASSESSMENT

# CITY OF NASHVILLE, ARKANSAS

# NPDES PERMIT #AR0021776

**August 26, 2009**

**PREPARED BY: ALLEN GILLIAM**

**STATE PRETREATMENT COORDINATOR**

**ADEQ**

## TABLE OF CONTENTS



## LIST OF ATTACHMENTS

## 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 June 16 - 18, 2009, of the Pretreatment Program implemented by City of Nashville, Arkansas. Participants included:

| | |
|---|---|
| Allen Gilliam | ADEQ/Pretreatment Coordinator |
| Ed Carlyle | City/Pretreatment Coordinator |
| Larry Dunaway | City/Public Works Director |

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Nashville's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403;

* To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges;

* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements and;

* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

Nashville's Pretreatment Program was originally approved 4/12/93. There have been no modifications to date. Program modification requirements to be current with the "Streamlining" revisions to 40 CFR 403 were incorporated into the City's permit. The modifications are due 12 months from its effective date, 2/1/10.

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

Since 1/07 through 8/08 the City's effluent has exhibited lethality and sublethality to the ceriodaphnia dubia with the same effects on the fathead minnow reported in 7/07. A Ni/Cr plater was disconnected from the City's collection system since that time and there have been no additional WET failures since.

The plant's design flow is 2.3 MGD and averages about 1.46 MGD with 0.06 MGD being contributed by two (2) significant industrial users, metal finishers regulated under 40 CFR 433 both Ni/Cr platers. One had its permit terminated for discharge of its Ni/Cr waste and is only allowed to discharge wastewater from its tumbling operations. This company is seldom in operation.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to their two (2) permitted industrial users and an informal inspection at one non-permitted IU: Pilgram's Hatchery. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachment A.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

## B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of Nashville's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

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

During the file review it was discovered comprehensive inspections were not being documented. The inspections lacked detailed information on the IUs' processes, pretreatment, chemical handling and storage procedures, chemical spill prevention areas, hazardous waste storage handling procedures, sampling procedures and the IUs' monitoring records (See "Audit Checklist's IU File Review, Section 9.a. through 9.q." and Attch. A-3 for comparison).

If the inspection Checklist items were to have been addressed and documented, the City's inspections would have been deemed adequate. It was suggested to complete such a comprehensive inspection and use a copy of it during subsequent inspections to use as a work copy to update any changes made at the IU. One of the first questions that should be asked at the beginning of an inspection should be, "Has there been any process, raw material or chemistry changes made since the last inspection?"

*2)* Under ***40 CFR 403.8(f)(5)*** "The [City] shall develop and implement an enforcement response plan [ERP]." And, on Page 6, Exhibit F of the City's approved Pretreatment Program, the ERP states "Any discrepancies noted during compliance screening shall be considered a violation and will be documented in the IU's file. The IU will be notified by telephone or letter within ten (10) working days of any violations noted..."

During the Jane-Eze file review a monthly average Zinc violation was noted. The IU notified the City of the violation and repeated sampling/analysis per 40 CFR 403.12(f)(2) (see Attch. A-6). No documentation of initial or follow-up enforcement could be produced. If a phone call was made discussing the violation, the record of communication must be documented and placed in the IU's file.

*3)* Under ***40 CFR 403.12(e)***, "Any Industrial User subject to a categorical Pretreatment Standard..., after commencement of the discharge into the POTW, shall submit to the Control Authority..., a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical Pretreatment Standards. In addition, this report shall include a record of measured or estimated average and maximum daily flows for the reporting period for the Discharge reported...."

During the file review, at least one of Jan-Eze's periodic compliance reports did not include a flow. The flows must be reported.

*4)* Under ***40 CFR 403.8(f)(2)(vi)***, "Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006..."

During the file review, slug discharge potential evaluations could not be located. These slug evaluations must be documented in each IU's file (a good example "Slug Evaluation Form" was sent to the City for its use).

The documents supplied by Jan-Eze, "RCRA Contingency Plan and Emergency Procedures" and their "Accidental Spill Prevention/Response Plan" did not include the basic slug control criteria located in 40 CFR 403.8(f)(2)(vi)(A - D).

*5)* Aero's permit requires them "***to test and sample for all TTO compounds listed under 40 CFR 433.11(e)"***

Documentation this was occurring could not be produced. The City must enforce its IU permit provisions or remove them if deemed not necessary.

*6)* Under ***CFR 403.8(f)(1)(B)(4)***, "Both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions: Self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored..."

Revise Aero's permit monitoring language to state "grab" sampling instead of "timed composites" because of their current brief batch discharge practices. Grab samples should be taken over the discharge period to later composite for the most representative sample, but these are not considered "timed composites".

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

*1)* Strongly recommend liquid waste (septage) hauler(s) be permitted with at least the minimum 40 CFR 403.5(a)(1) and (b) prohibitions included.

Certification statements should also be included: "There shall be no hazardous, industrial or restaurant grease trap waste discharged by [NAME] to the City's wastewater collection system or treatment plant." An overarching certification statement from the hauler's owner should mirror the one in 40 CFR 403.6(a)(2)(ii).

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

*3)* Recommend sending all SIUs a copy of their reporting requirements located in 40 CFR 403.12. One provision, the notification of "changed discharge" requirement is consistently "overlooked" by many IUs and control authorities throughout the State. Equipment or plumbing modifications to pretreatment/process equipment constitute such changes requiring notification in the form of updated schematics.

*4)* Recommend sending blanket questionnaires to the smaller, "non-significant" commercial facilities requesting information about any wastewater generated and characteristics. Radiator shops, automobile repair shops, the local hospital, dentist offices, car/truck washes and machine shops were a few discussed during the audit. These survey questionnaires could be somewhat tailored to "fit" each business sector's operations.

Documentation of all surveys will fulfill the City's obligation under 40 CFR 403.8(f)(2)(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 made under this paragraph shall be made available to the Regional Administrator or Director upon request."

It is also recommended to include questions asking about Pollution Prevention practices, water and energy conservation measures and Best Management Practices.

*5)* Recommend requiring Aero to submit monthly certification statements they are not discharging any wastewater into the City's collection system from their Ni/Cr plating operations.

*6)* Recommend more frequent un-announced and documented inspections at Aero. With the IU in a state of flux regarding re-commencing operations or completely ceasing operations, it would be in the City's best interest to maintain a constant presence.

*7)* Recommend formalizing and implementing an oil and grease program. The City could realize substantial savings if its restaurants and problem areas of the City disposed of their grease to a landfill instead of the sewer system.

*8)* Recommend permitting Pilgram's Pride hatchery. Pilgram's "process" (washdown) flow meets the criteria in 40 CFR 403.3(t)(ii) as a Significant Industrial User. At a minimum, analysis of their wastewater would aid the City in making the decision if this IU could have a harmful effect on its wastewater treatment plant's effluent.

This office's experience with hatcheries is that Zinc can be a pollutant of concern without good management practices implemented at these facilities.

*9)* Recommend sending out fliers or writing public service notices to your local newspaper regarding the problems caused by disposing of kitchen grease down the sink. Fliers or newspaper articles could also focus on the potential toxic effects of disposing of unused or expired medications into the City's sewage collection system.

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

*11)* Recommend revising the City's current Enforcement Response Plan to include the enforcement option of requiring a "Pollution Prevention Audit" with subsequent follow action with its recommendations for more efficient processes/pretreatment.

*12)* Although not a requirement under 40 CFR 403, it's recommended to modify the city's existing ordinance to include language reflecting it's purpose and policy (Section 10.12.01) to "Encourage pollution prevention, waste minimization, water and energy conservation through best management practices".

**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…".

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

*2)* Submit all necessary Pretreatment Program modifications to come into compliance with the revised "streamlining" provisions in 40 CFR 403. Keep in mind, these revision are not isolated to just the Pretreatment Ordinance.

* * * * * * * *

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

A. GENERAL INFORMATION

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

Permit Signatory: Larry Dunaway Title: Public Works Director

Telephone: 870.845.4015 FAX NUMBER: 870.845.7409

Pretreatment Contact: Ed Carlyle Title: Pretreatment Coord.
Address: 200 Lake Nichols Drive
Telephone: 870.845.7402
e-mail ecarlyle@nashar.org

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: Jan. 1 thru Dec. 31 Date(s) of Audit: 6/16-6/18/09 (ASSESSMENT)

Inspector(s):

| NAME | TITLE/AFFILIATION | PHONE NUMBER |
|---|---|---|
| Allen Gilliam | Pret. Coord/ADEQ | 501.682.0625 |

Control Authority representative(s):

| NAME | TITLE | PHONE NUMBER |
|---|---|---|
| * Ed Carlyle | Same | Same |
| Larry Dunaway | Public Works Director | 870.645.4015 |

* Identifies Program Contact

Dates of Previous PCIs/Audits:

| TYPE | DATE | DEFICIENCIES NOTED |
|---|---|---|
| PCI | 11/07 | No major deficiencies reported |
| PCI | 12/06 | IU sample collection deficiencies and sampling point was inadequate. |

| 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:** *There's some in-house confusion on whether CAO # 06-010 is closed or not. |
| ✓ | ___ | **Is the Control Authority currently in SNC or RNC?** ***(Reporting requirements)*** |

. . . . . .

B. TREATMENT PLANT INFORMATION

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

| NPDES Permit No. | Name of Treatment Plant | Effective Date | Expiration Date |
|---|---|---|---|
| *AR0021776 | Nashville POTW | 2/1/09 | 1/31/2014 |
| | | | |
| | | | |

* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

2. Individual Treatment Plant Information

a. Name of Treatment Plant: City of Nashville
Location Address: 733 Hwy 27 South

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 2.3 MGD; Actual (Average)- 1.6 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages: ??

Industrial Contribution to this Treatment Plant

# of SIUs : 3 # of CIUs : 3
Industrial Flow (mgd): 0.09 Industrial Flow (%) : 0.6 %

| Level of Treatment | | Type of Process(es): |
|---|---|---|
| Primary | ✓ | Aerated lagoons; stabilization pond; |
| Secondary | ✓ | DAF units; contact chamber |
| Tertiary | | |

Method of Disinfection: Chlorine

Dechlorination ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Mine Creek

Receiving Stream Classification: Segment 1C, Red River Basin

Receiving Stream Use: Primary Contact Recreation, raw water source

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

| Method of Sludge Disposal: | | Quantity of Sludge: |
|---|---|---|
| _____ | Land Application | _____ dry tons/yr. |
| _____ | Incineration | _____ dry tons/yr. |
| _____ | Monofill | _____ dry tons/yr. |
| _____ | Mun. Solid Waste Landfill | _____ dry tons/yr. |
| _____ | Public Distribution | _____ dry tons/yr. |
| ✓ | Lagoon Storage | _____ dry tons/yr. |
| _____ | Other (specify) | _____ dry tons/yr. |

List of toxic pollutant limits in NPDES permit: conventionals, NH3-N TRC, T.Phos, Se and CN

a. (continuation of individual treatment plant information for Nashville Wastewater Treatment Plant.)

| YES | NO | |
|---|---|---|
| ✓ | | Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following: |

Issuing Authority: ADEQ
Issuance Date: Same
Expiration Date: same

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

| YES | NO | N/A | |
|---|---|---|---|
| ✓ | | | Has the Control Authority submitted results of whole effluent biological toxicity testing. |
| ✓ | | | Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) Since 1/07 thru 8/08 there has been lethality and sublethality to the ceriodaphnia dubia with lethal and sublethal effects on the fathead minnow reported 7/07. |

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

| | Influent | Effluent | Sludge | Ambient |
|---|---|---|---|---|
| Metals * | 4 | 4 | | |
| Priority ** | 1 | 1 | | |
| Biomonitoring | | 4 | | |
| TCLP | | | | |
| Other: | | | | |

* As identified at 40 CFR 122, Appendix D, Table III, ** As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.
"Stayed relatively the same"

| YES | NO | N/A | |
|---|---|---|---|
| | ✓ | | Has the POTW begun tracking the trends in the above samples? |
| | ✓ | | Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months? |

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

| Parameters Violated | Cause(s) |
|---|---|
| DO-9/08 & 11/07 | Possible "turnover" |
| NH3-N-5/07, 1/09, 12/08 | Treatment plant doesn't have nitrification |
| CN - 12/07 & 3/07 | Possible lab error? |

| YES | NO | |
|---|---|---|
| | ✓ | Has the treatment plant sludge violated the TCLP Test? |

## SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

| YES | NO | |
|---|---|---|
| | n/a | Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)] |
| | ✓* | Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below. *City is in the process of revising its Program to be current with 40 CFR 403. *Submittal is due 2/1/10.* |

1. Modifications: N/A

| Date Approved by DEQ | Ordinance Citation/ Nature of Modification | Date Incorporated in NPDES Permit |
|---|---|---|
| n/a | *City will be making Streamlining mods to their entire program including re-eval. of local limits | |
| | | |
| | | |

2. Modifications in Progress: *See above*

| Date Requested | Nature of Modification |
|---|---|
| | |
| | |

| YES | NO | |
|---|---|---|
| | ✓ | Have any changes been made to any pretreatment program components (excluding any listed above)? If yes: |
| | n/a | Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc. |

D. Legal Authority [403.8(f)(1)]

Date of original Pretreatment Program approval: 4/12/93 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 3/16/93
Date of most recent Pretreatment Program modification approval: -

Does the Control Authority's legal authority enable it to: [403.8(f)(1)(i-vii)]

| YES | NO | |
|---|---|---|
| ✓ | | Deny or condition pollutant discharges |
| ✓ | | Require compliance with standards |
| ✓ | | Control discharges through permit or similar means |
| ✓ | | Require compliance schedules and IU reports |
| ✓ | | Carry out inspection and monitoring activities |
| ✓ | | Obtain remedies for noncompliance |
| ✓ | | Comply with confidentiality requirements |
| | ✓ | Establish Pollution Prevention |
| | ✓ | Has the city developed and adopted a Pollution Prevention policy? |

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

___ ✓ Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

_____ No oversight authority
_____ No inspection authority
_____ No remedies for noncompliance
_____ No "equivalent" standard
_____ No clear delineation of responsibility for program implementation
_____ Interjurisdictional agreements not entered into
_____ Other, Specify: _____

✓ ___ Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no:

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

___n/a__ Have provisions been made for the incorporation of Pollution Prevention ($P^2$) 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. | | | | |
| 4. | | | | |

If relying on activities of contributing jurisdictions, indicate which activities are performed by jurisdictions and describe any problems in their implementation.

| | | Problems |
|---|---|---|
| ___ | Updating industrial waste survey | n/a |
| ___ | Notification of IUs | |
| ___ | Permit issuance | |
| ___ | Receipt and review of IU reports | |
| ___ | Inspection and sampling of IUs | |
| ___ | Assessment of IUs for $P^2$ activity | |
| ___ | Analysis of samples | |
| ___ | Enforcement | |
| ___ | Other: _____ | |

Briefly describe other problems: _____

_____

## SECTION II: PROGRAM ANALYSIS AND PROFILE

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: n/a

| IU Name | Problem | NPDES Permit Violation Yes | No |
|---|---|---|---|
| n/a | | | |
| | | | |

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. By simple word of mouth typically allows the Pretreatment Coordinator knowledge of any new IUs.* |
| | ✓ | If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating $P^2$ activity? |
| ✓ | | Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] |
| | ✓ | If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate $P^2$ activity and the distribution of $P^2$ 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: |

| Name of IU | Type of Industry | Is the IU Permitted? |
|---|---|---|
| N/A | | |

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

a. 3* SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 3 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 0 Noncategorical SIUs
d. 2 Other regulated nonsignificant IUs (Describe) septage haulers
5 TOTAL of a. + d. **One CIU ceased regulated ops 6/08. City ceased permitting them and dropped them from their list of SIUs. The count is now only 2.*

## 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(t)(1)(i-ii)] |

If not, the Control Authority has defined "significant industrial user" to mean:

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

| YES | NO | |
|---|---|---|
| ___ | ✓ | Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application? |

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

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

| IU NAME | PERMIT EXPIRATION DATE |
|---|---|
| N/A | |
| | |
| | |

| YES | NO | |
|---|---|---|
| ✓ | ___ | Does the Control Authority accept trucked septage wastes? *(only one)* |
| ___ | ✓ | 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)] |
| ___n/a___ | | Are all applicable categorical standards and local limits applied to trucked wastes ? |

**It's "understood" by the only septage hauler where to discharge.*

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):
Septage haulers are required to pay a fee at the downtown office.
All loads being dumped are witnessed by POTW personnel.

## SECTION II: PROGRAM ANALYSIS AND PROFILE

| YES | NO | |
|---|---|---|
| ___ | ✓ | 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 | |
| | |
| | |
| | |

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?

| | | | |
|---|---|---|---|
| ___ | Federal Register | ✓ | Journals, Newsletters |
| ✓ | Meetings, Training | ✓ | Other Internet |
| ✓ | Government Agencies | ___ | 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? |

*City is re-evaluating their MAHLs/MAILs and the need for TBLLs.*

If yes, complete the information below:

| Pollutant Changed | Old Limit | New Limit | Reason for Change |
|---|---|---|---|
| Unknown at this time. | | | |
| | | | |
| | | | |
| | | | |

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

| | Headworks Analysis Completed? | | Local Limits Needed? | | Local Limits Adopted? | | 1992 MAHL/MAHC Calc'd |
|---|---|---|---|---|---|---|---|
| | Yes | No | Yes | No | Yes | No | (Lb/d / mg/l) |
| Arsenic (As) | ✓ | | | ✓ | | ✓ | 1.2 / 0.1 |
| Cadmium (Cd) | ✓ | | | ✓ | | ✓ | 0.192 / 0.016 |
| Chromium-Total | ✓ | | | ✓ | | ✓ | 12 / 1.0 |
| Copper (Cu) | ✓ | | | ✓ | | ✓ | 2.7 / 0.22 |
| Cyanide (CN) | ✓ | | | ✓ | | ✓ | 0.486 / 0.04 |
| Lead (Pb) | ✓ | | | ✓ | | ✓ | 0.19 / 0.016 |
| Mercury (Hg) | ✓ | | | ✓ | | ✓ | 0.003 / 0.0002 |
| Molybdenum (Mo) * | | | | | | | |
| Nickel (Ni) | ✓ | | | ✓ | | ✓ | 12 / 1.0 |
| Selenium (Se) * | | | | | | | |
| Silver (Ag) | ✓ | | | ✓ | | ✓ | 0.009 / 0.0007 |
| Zinc (Zn) | ✓ | | | ✓ | | ✓ | 3.6 / 0.3 |

** - If necessary for the sludge disposal option chosen.*

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 | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

YES NO

___n/a___ Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

## SECTION II: PROGRAM ANALYSIS AND PROFILE

What method of allocation was used for local limits for each pollutant that has a local limit in-place? *N/A local limits were deemed not necessary originally*

| | TYPE OF ALLOCATION | | |
|---|---|---|---|
| | Uniform Concentration | Mass | Hybrid |
| Arsenic (As) | If local limits were necessary, the City | | |
| Cadmium (Cd) | would probably use the mass-based on | | |
| Chromium-Total | contributory flow method. | | |
| 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 | |

| # | % | |
|---|---|---|
| | | How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year) |
| 0 | 0 | Not sampled at least once in the past reporting year? |
| 0 | 0 | Not inspected at least once in the past Pretreatment reporting year? |
| 0 | 0 | Not inspected and not sampled at least once in the past reporting year ? [WENDB-NOIN]-[403.8(f)(2)(v)] |

## SECTION II: PROGRAM ANALYSIS AND PROFILE

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.

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:

| | Analytical Method * | Name of Laboratory |
|---|---|---|
| Metals | ICP | ANA Labs & American Interplex |
| Cyanide | Spectrophotometric | " |
| Organics | GC/MS | " |
| Other | WET | American Interplex |

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

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

| 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 labs |

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

| | |
|---|---|
| 5dys | Conventionals |
| " | Metals *(via e-mail)* |
| 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: _____

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:_____ |

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

I. ENFORCEMENT

YES NO

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

✓ ___ Does the Control Authority have a written enforcement response plan? [403.8(f)(5)]. If yes, does the plan:

YES NO

✓ ___ Describe how the Control Authority will investigate instances of noncompliance

✓ ___ Describe the Control Authority's types of escalating enforcement responses and the periods for each response

✓ ___ Identify by Title the Official(s) responsible for implementing each type of enforcement response

✓ ___ Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

✓ Notice or letter of violation
✓ Setting of compliance schedule
✓ Injunctive relief
✓ Administrative Order
_____ Revocation of permit
✓ Fines (maximum amount):

civil $ 1000 /day/violation
criminal $ 1000 /day/violation
administrative $ _____ /day/violation

✓ Imprisonment
✓ Termination of Service
_____ Other: _____

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

YES NO

✓* ___ When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]

**Records of communication need to be documented.*

✓ ___ 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?

## SECTION II: PROGRAM ANALYSIS AND PROFILE

| 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 Type | Enforcement Action Date | Return to Compliance? Yes (Date) | Return to Compliance? No |
|---|---|---|---|---|---|
| n/a | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

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

| # | % | |
|---|---|---|
| 0 | 0 | Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards) |
| 0 | 0 | Self-monitoring requirements [WENDB-MSNC] |
| 0 | 0 | Reporting requirements [WENDB-PSNC] |
| 0 | 0 | Pretreatment compliance schedule [WENDB-SSNC] |

0 How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

| YES | NO | |
|---|---|---|
| | ✓ | Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. |

Has the Control Authority experienced any of the following:

| YES | NO | | EXPLAIN and ID Industrial User |
|---|---|---|---|
| | ✓ | Interference [WENDB]. | |
| | ✓ | Pass through [WENDB]. | |
| | ✓ | Fire or explosions? (incl. flash point viol.) | |
| | ✓ | Corrosive structural damage? (incl. pH <5.0). | |
| | ✓ | Flow obstructions? | |
| | ✓ | Excessive flow or pollutant concentrations? | |
| | ✓ | Heat problems? | |
| | ✓ | Interference due to oil or grease? | |
| | ✓ | Toxic fumes? | |
| | ✓ | Illicit dumping of hauled wastes? | |

✓ ___ Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]

## SECTION II: PROGRAM ANALYSIS AND PROFILE

__0__ How many SIUs are currently on compliance schedules?

| YES | NO | |
|---|---|---|
| ___ | ✓ | 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:

| | Number | Amount |
|---|---|---|
| Civil | ___ | $ ___ |
| Administrative | 0 | $ ___ |
| Total | 0 | $ ___ [WENDB-IUPN] |

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

| YES | NO | |
|---|---|---|
| ✓ | ___ | Are inspection & sampling records well documented, organized and readily retrievable? Are files/records: |

| YES | NO | |
|---|---|---|
| ✓ | ___ | computerized |
| ✓ | ___ | hard copy |
| ___ | ___ | OTHER: ___ |

Are the following files computerized:

| YES | NO | |
|---|---|---|
| ✓ | ___ | Control Mechanism Issuance |
| ✓ | ___ | Inspection and Sampling schedule |
| ___ | ✓ | Monitoring Data |
| ___ | ✓ | IU Compliance Status Tracking |
| ___ | ___ | Other: ___ |

Can IU monitoring data can be retrieved by:

| | | |
|---|---|---|
| ✓ | ___ | Industry name |
| ___ | ✓ | Pollutant type |
| ___ | ✓ | Industrial category or type |
| ___ | ✓ | SIC Code |
| ___ | ✓ | IU discharge volume |
| ___ | ✓ | Geographic location |
| n/a | ___ | Receiving treatment plant (i.e. if > one plant in the system) |
| ___ | ___ | Other (specify) ___ |

| | | |
|---|---|---|
| ✓ | ___ | Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)] |
| ___ | ✓ | Have IUs requested that data be held confidential? How is confidential information handled by the Control Authority? ___ |
| ✓ | ___ | Are there significant public or community issues impacting the POTW's pretreatment program? |

If yes, please explain: Quite possibly more stringent local limit may have to be developed & implemented for Cu & CN which are now permit limits.

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ 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

About ½ of a FTE.

___ ✓ 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:

| | Percent of Total Funding |
|---|---|
| ✓ POTW general operating fund | 95 |
| ✓ 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:

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

| YES | NO | | If no, explain |
|---|---|---|---|
| ✓ | ___ | Legal assistance | |
| ✓ | ___ | Permitting | |
| ✓ | ___ | IU inspections | |
| ✓ | ___ | Sample collection | |
| ✓ | ___ | Sample analyses | |
| ✓ | ___ | Data analysis, review and response | |
| ✓ | ___ | Enforcement | |
| ✓ | ___ | Administration (inc. record keeping /data management) | |

Does the Control Authority have access to adequate:

| YES | NO | | If yes then list and if no, explain |
|---|---|---|---|
| ✓ | ___ | Sampling equipment | 2 auto samplers and 1 portable sampler |
| ✓ | ___ | Safety equipment | Standard equipment |
| ✓ | ___ | Vehicles | Pick up truck |
| ✓ | ___ | Analytical equipment | Standard list for pH and conventionals |

# SECTION II: PROGRAM ANALYSIS AND PROFILE

## L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
   None

2. Has the source of any toxic pollutants been identified?
   If yes, what was found?
   Not since last audit.

3. Has the POTW implemented any kind of public education program? If yes, describe:
   No

4. Does the POTW have any pollution prevention success stories for industrial users documented? Yes*. If yes, please attach. **City has IUs who have implemented P2 but, have not compiled their "stories".*

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?
   *See Attch. A-1k and A-11 for a brief example of what one IU reported on their permit application.

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No
   If yes, which of the "Guides to Pollution Prevention" were used? _____
   n/a

## SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Jan-Eze Plating File/ID No. NA003
Industry Address 100 Mission Drive, 71852
Industry Description Hard chrome and nickel plate small engine cylinders/pistons
Industrial Category Metal Finishing 40 CFR 433.17 SIC Code: 3471
Ave. Total Flow (gpd) 10,000 to 19,000 Ave. Process Flow (gpd) 2,100

Industry visited during audit: YES

Comments: Questionable flows between process vs. total

FILE #: 2 Industry Name Aero, Inc. File/ID No. NA001
Industry Address 600 Mill Street
Industry Description Mfg/Assembly of scissors and shears from forged strip steel
Industrial Category Metal Finishing 40 CFR 433.15 SIC Code: 3421,3312
Ave. Total Flow (gpd) ??? Ave. Process Flow (gpd) 2,500 (batch)

Industry visited during audit: YES

Comments: Facility has been idled for quite some time with no production.

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:

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:

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

Industry visited during audit: YES NO

Comments:

## SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

| | FILE 1 | FILE 2 | FILE 3 | FILE 4 | FILE 5 |
|---|---|---|---|---|---|
| 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 | ES | | | |
| b. Is this IU one identified as having $P^2$ potential? | yes | yes | | | |

B. Control Mechanism

| | | | | | |
|---|---|---|---|---|---|
| 1. Does the file contain an application for a control mechanism? | 1 | ✓ | | | |
| If yes, what is the application date? | 4/06 | 12/07 | | | |
| Does it ask for Pollution Prevention information? | yes | yes | | | |
| 2. Does the file contain a Permit? | ✓ | ✓ | | | |
| Permit Expiration Date? | 5/11 | 12/12 | | | |
| Is a fact sheet included? | 2 | 2 | | | |
| 3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)] *See Attch. A-2 for example* | | | | | |
| a. Legal Authority Cite? | ✓ | ✓ | | | |
| b. Expiration date? | ✓ | ✓ | | | |
| c. Statement of nontransferability? | ✓ | ✓ | | | |
| d. Appropriate discharge limitations? | ✓ | ✓ | | | |
| e. Appropriate self-monitoring requirements? | 3 | 4 | | | |
| f. Sampling frequency? | ✓ | ✓ | | | |

Comments: 1. See Attch. A-1 for example; 2) City rep. has started on these and will use EPA's guidance manual example to complete them; 3) 2/yr except for Cr & Ni (once/month); 4) City not allowing discharge from plating ops, only from tumbling operations and is modifying IU's permit to reflect sampling ("grab") procedures because of IU's batch discharge practices.

## SECTION III: INDUSTRIAL USER FILE REVIEW

| | FILE 1 | FILE 2 | FILE 3 | FILE 4 | FILE 5 |
|---|---|---|---|---|---|
| g. Sampling locations? | ✓ | ✓ | | | |
| h. Requirement for flow monitoring? | ✓ | ✓ | | | |
| i. Types of samples (grab or composite) for self-monitoring? | ✓ | ✓ | | | |
| j. Applicable IU reporting requirements? | ✓ | ✓ | | | |
| k. Standard conditions for: | | | | | |
| Right of Entry? | ✓ | ✓ | | | |
| Records retention? | ✓ | ✓ | | | |
| Civil and Criminal Penalty provisions? | ✓ | ✓ | | | |
| Revocation of permit? | 1 | 1 | | | |
| l. Compliance schedules/ progress reports | n/a | n/a | | | |
| m. General/Specific Prohibitions? | ✓ | ✓ | | | |
| n. Where technologically and economically achievable, are $P^2$ aspect included? | no | no | | | |

C. Application of Standards

| | | | | | |
|---|---|---|---|---|---|
| 1. Has the IU been properly categorized? | ✓ | ✓ | | | |
| 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)] | ✓ | ✓ | | | |
| 4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)] | n/a | n/a | | | |

Comments: 1. The city uses the term "termination".

## SECTION III: INDUSTRIAL USER FILE REVIEW

| | FILE 1 | FILE 2 | FILE 3 | FILE 4 | FILE 5 |
|---|---|---|---|---|---|
| 5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)] | n/a | n/a | | | |
| 6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied? | n/a | n/a | | | |
| 7. Is the Control Authority applying a bypass provision to this IU? | ✓ | ✓ | | | |
| **D. Compliance Monitoring** | | | | | |
| **Sampling** | | | | | |
| 1. Does the file contain Control Authority sampling results for the industry? | ✓ | ✓ | | | |
| 2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)] | ✓ | ✓ | | | |
| 3. Does the sampling report(s) include: [403.8(f)(2)(vi)] | | | | | |
| a. Name of sampling personnel? | ✓ | ✓ | | | |
| b. Sample date and time? | ✓ | ✓ | | | |
| c. Sample type? | ✓ | ✓ | | | |
| d. Wastewater flow at the time of sampling? | no | ✓ | | | |
| e. Sample preservation procedures? | ✓ | ✓ | | | |
| f. Chain-of-custody records? | ✓ | ✓ | | | |
| g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs] | ✓ | ✓ | | | |

## SECTION III: INDUSTRIAL USER FILE REVIEW

| | FILE 1 | FILE 2 | FILE 3 | FILE 4 | FILE 5 |
|---|---|---|---|---|---|
| 4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements? | 1 | 2 | | | |
| 5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples? | timed | batch | | | |
| 6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi) | ✓ | ✓ | | | |
| Inspections *See Attch. A-3 for example* | | | | | |
| 7. Does the IU file contain inspection reports? | ✓ | ✓ | | | |
| 8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)] | ✓ | ✓ | | | |
| b. Date of last Inspection | 6/09 | 6/09 | | | |
| 9. Does the inspection report(s) include: [403.8(f)(2)(vi)] | | | | | |
| a. Inspector Name(s) | ✓ | ✓ | | | |
| b. Inspection date and time? | ✓ | ✓ | | | |
| c. Name and title of IU official contacted? | ✓ | ✓ | | | |
| d. Verification of production rates? | n/a | n/a | | | |
| e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)? | 3 | 3 | | | |
| f. Evaluation of pretreatment facilities? | ✓ | ✓ | | | |

Comments: 1) TOMP was submitted in '95 (See Attch. A-5). It should be sent back to the IU to see if it needs updating; 2) This IU is only discharging from numerous vibratory tumblers but the city is requiring them to analyze the TTOs 1/yr. Can't find evidence that was being done; 3) General in nature & could more comprehensive OR reference IUs' schematics w/process narratives "on file". Janeze has some excellent process narrative descriptions and schematics on file.

## SECTION III: INDUSTRIAL USER FILE REVIEW

| | FILE 1 | FILE 2 | FILE 3 | FILE 4 | FILE 5 |
|---|---|---|---|---|---|
| g. Evaluation of self-monitoring equipment and techniques? | no | no | | | |
| h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)] | 1 | 1 | | | |
| i. Manufacturing facilities? | 2 | 2 | | | |
| j. Chemical handling and storage procedures? | no | no | | | |
| k. Chemical spill prevention areas? | ✓ | ✓ | | | |
| l. Hazardous waste storage areas and handling procedures? | no | no | | | |
| m. Sampling procedures? | no | no | | | |
| n. Laboratory procedures? | n/a | n/a | | | |
| o. Monitoring records? | ✓ | ✓ | | | |
| p. Evaluation of Pollution Prevention opportunities? | yes | yes | | | |
| q. Control Authority inspector signature? | ✓ | ✓ | | | |
| **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 | n/a | | | |
| 12. Did the IU report on all required parameters? | ✓ | ✓ | | | |

Comments: 1) City needs to have a more comprehensive slug potential evaluation in each IU's file; 2) Again, very general in nature & could more comprehensive OR reference IUs' schematics w/process and pretreatment narratives "on file"

## SECTION III: INDUSTRIAL USER FILE REVIEW

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

E. Enforcement

| | | | | | |
|---|---|---|---|---|---|
| 1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)] | | | | | |
| a. Control Authority monitoring results? | ✓ | ✓ | | | |
| b. IU self-monitoring results? | no | ✓ | | | |

Comments: 1) IU has a Haz. Waste contingency Plan, an Emergency Procedure but and a Accidental Spill Prevention/Response Plan (Attch. A-4) but, all combined do not have the minimum criteria in 40 CFR 403.8(f)(2)(vi)

## SECTION III: INDUSTRIAL USER FILE REVIEW

| | FILE 1 | FILE 2 | FILE 3 | FILE 4 | FILE 5 |
|---|---|---|---|---|---|
| c. If NS CIU was it compliant within 90 days from commencement of discharge? | ✓ | n/a | | | |
| 2. How many reports submitted during the past reporting year indicated discharge violations? | 1 | 0 | | | |
| 3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)? | 2 | n/a | | | |
| 4. Was additional monitoring conducted within 30 days after each discharge violation occurred? | ✓ | n/a | | | |
| 5. Were all nondischarge violations identified in the file? | n/a | n/a | | | |
| 6. Was the IU notified of all violations? | 2 | n/a | | | |
| 7. Was follow-up enforcement action taken by the Control Authority? | ✓ | not necess. | | | |
| 8. Did the Control Authority follow its approved ERP? | ✓ | ✓ | | | |
| 9. Did the Control Authority's enforcement action result in the IU achieving compliance? | ✓ | n/a | | | |
| 10. Is there a compliance schedule? If yes: | no | no | | | |
| 11. Were there any compliance schedule violations? | - | - | | | |
| 12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)] | ✓ | ✓ | | | |

Comments: 1. Sample on 10/1/08 exceeded Zn daily limit. IU notified City. They were told to immediately resample. Resample on 10/15/08 was back in compliance. No record of communication regarding the initial phone call or violation.

## SECTION III: INDUSTRIAL USER FILE REVIEW

| | FILE 1 | FILE 2 | FILE 3 | FILE 4 | FILE 5 |
|---|---|---|---|---|---|
| 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 | 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: 6/16 - 6/18/09 Date entered into ICIS 8/28/09
(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 |
| *Confusion | whether CAO for Pretreatment Violations is closed | |
| 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. |

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

Control Authority: City of Nashville NPDES #: AR0021766

Name, address and phone number of industry:
Aero, Inc., 600 South Mill Street, 870.845.4075
Type of industry: Metal Finisher Date/Time of visit:

6/17/09 / 10:30 a.m.

Industry contacts: Tim McNulty - President

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

**Sampling site is set up next to tumbler w.w. holding tank.

Additional comments: Facility was completely shut down and hasn't processed any material in months. Initial concerns was the water flow indicated by the city's records and a visual of the water meter outside the facility. A comprehensive search both inside and outside the building yielded no evidence there was a water leak. IU used to forge, auto-grind, polish, drill, tumble and Ni/Cr plate scissors and shears.

Visit conducted by: Gilliam/Carlyle Date: 6/17/09

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: Aero-Inc.

Additional comments: Past suspected untreated bath/rinse dumps to the City caused the city to require "no discharge" from the Ni/Cr plating operations. Wastewater from the tumbling operations is the only water that is currently permitted for discharge with *no pretreatment necessary.

IU brings in rolls of strip carbon steel which is mechanically sheared into a basic knife form. Handle end is forged. Scissor half is heat treated then oil quenched. Six (6) vibratory tumblers are set up to remove the rough edges and burrs in a rock media with soapy water. This wastewater is sent via garden hose to a 2,500 gallon tank in the corner of that section of the building to hold wastewater from the tumblers before batch discharge to the city. This room is completely separate from any of the plating ops. room. Halves are either hand or machine ground then sent to the plating room. Depending on customer needs, scissor halves are either bright or dull nickel plated, then to through the nickel-hard chrome plating line. Schematics would indicate some P2 practices such as countercurrent cascade rinses and dead rinse tanks being used as make-up in nickel baths. Nickel tank is still being circulated so it won't set up from lack of use. + Concrete floors around plating lines were badly pitted with obvious acid spills but any spills would be collected in floor troughs that gravity feed to one of two (2) collection pits prior to pretreatment. When in use, the wastewater from this plating operation is now hauled off-site. No floor drains found.

Visit conducted by: Gilliam/Carlyle Date: 6/17/09

Allen Gilliam

(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:

JAN-EZE, 100 Mission Drive, 870.845.5134

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

6/17/09 / 1:30 p.m.

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

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

Additional comments: IU plates both aluminum and steel products for outside customers such as nickel-chrome plating on small engine aluminum pistons and cylinders as well as large equipment ram/pistons. Their numerous Pollution Prevention (P2) practices on the plating lines include countercurrent cascade rinses; dead rinses that are returned to plating baths; mist eliminators/mesh-pad scrubbers over the chrome plating baths where the Cr and fresh water rinse is captured for re-use and fog rinses.

Visit conducted by: Gilliam/Carlyle Date: 6/17/09

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Nashville NPDES #: AR0021776

Industry name: JAN-EZE

Additional comments: They have a sulfuric strip tank for defective chrome plating. Their parts washer removes oil from their cylinder honing process. This oil is separated by an oil skimmer 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. Surface prep. includes various soaps and acid submersions then rinsed. All plating/rinse stations are surrounded by a 4" concrete containment curb and grated ditch. All rinse waters are directed to a 3000 gallon rinse tank or a wastewater pit under the pretreatment system which is pumped back into the 3000 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 precip of metal solids; polymers are added to aid in the clarifier flocculation process; pH neutralization; supernatant is gravity fed through sand filters before discharge to the POTW. Sludge is filter pressed then dried to reduce volume to be disposed of off-site. This process can be continuous or batch treated.

Facility has had no permit violations since '06.

IU reps very familiar with processes, P2 and pretreatment as well.

---

Visit conducted by: Gilliam/Carlyle Date: 6/17/09

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

JAN-EZE
PLATING INC.

100 Mission Drive • Nashville, Arkansas 71852 • (870) 845-5134 • Fax (870) 845-5168
e-mail: larry.jan-eze@totalnet.us

April 25, 2006



City of Nashville
426 North Main Street
Nashville, AR 71852

Attention: Ed Carlyle, Jr.

Dear Ed:

Enclosed is the Wastewater Discharge Permit Application that you requested. If you have any questions, please contact me at 845-5134.

Sincerely,

John Anderson

John Anderson
Environmental Manager

John Anderson

# WASTEWATER SURVEY FOR DISCHARGE PERMIT

## SECTION A - GENERAL INFORMATION

**A1. Company Name:** Jan-Eze Plating, Inc.

**Mailing address:** 100 Mission Drive

**City:** Nashville **State:** AR

**Zip Code:** 71852

**Telephone Number: Plant** 870-845-5134 **Office** same

**A2. Name, Title and phone number of person authorized to represent this firm in all official corresponses with the City of Nashville.**

**Name:** Larry Frohnappel

**Title:** General Manager

**Phone Number:** 870-845-5134



A-1b

**A3. Alternate person to contact concerning information provided herein:**

**Name:** John Anderson

**Title:** Environmental Manager

**Phone Number:** 870-845-5134

**A4. Identify the type of business conducted:**

Hard Chromium & Electrolytic Nickel

**A5. Provide a brief narrative description of the manufacturing production, or service activities your company provides.**

Jan-Eze Plating applies a hard chomium plated finish to small engine Cylinders and several varieties of steel parts.

Jan-Eze Plating also applies Electrolytic Nickel finish to small engine Pistons.

**A6. Standard Industrial Classification Number(s) Sic Code for your company:**

3471 , _____ , _____ , _____ , _____

**A7. This facility generates the following types of wastes (check all that apply).**

| | Average (Mgd) | Estimated | Measured |
|---|---|---|---|
| 1. (X) Domestic wastes Restrooms, showers | _____ | 1,425 | _____ |
| 2. ( ) Cooling non-contact Water | NA | _____ | _____ |
| 3. ( ) Boiler/Tower blow Down | NA | _____ | _____ |
| 4. (X) Process | _____ | 28,080 | _____ |
| 5. ( ) Equipment/Facility Washdown | NA | _____ | _____ |
| 6. ( ) Other: | NA | _____ | _____ |

**Total:** 29,505

**A8. Wastes are discharged to which of the following:**

| | Average | Estimated | Measured |
|---|---|---|---|
| (X) Sanitary Sewer | _____ | 29,505 | _____ |
| ( ) Storm Water | _____ | _____ | _____ |
| ( ) Waste Haulers | _____ | _____ | _____ |
| ( ) Evaporation | _____ | _____ | _____ |

**A9. Is a Spill Prevention Control and Countermeasure Plan prepared for the facility: Yes (X) No ( )**

## SECTION B - FACILITY OPERATION CHARACTERISTICS

**B1. Number of employees:** 57

**Number of shifts worked and the times:**

**First:** 6:00 **to** 2:00

**Second:** 2:00 **to** 10:00

**Third:** 10:00 **to** 6:00

**B2. Principal product produced:**

Electroplating performed on 2 cycle engine components and various steel parts.

**B3. Raw materials and process additives used:**

Chromium, Nitric Acid, Sulphuric Acid, Nickel, Sodium Hydroxide, Sodium Bisulphite.



A-1e

**B5. Production process is**

**Batch ( )  Continuous ( )  Both (X)**

**Average number of batches per 24hour day** 7

**B6. Hours of operation** continuous **to** _____

**B7. Is production subject to seasonal variation: Yes (X) No ( )**
**If yes, briefly describe seasonal production cycle:**

Small engine part plating (piston & cylinders)

increases during the spring and fall.

## SECTION C - WASTEWATER INFORMATION

**C1. If your facility employs processes in any of the thirty-four Industrial categories or business activities listed below and any of these processes generate wastewater or waste sludge, place a check beside the category or business activity.**

1. ( ) Adhesives
2. ( ) Aluminum Forming
3. ( ) Auto and Other Laundries
4. ( ) Battery Manufacturing
5. ( ) Coal Mining

6. ( ) Coil Coating
7. ( ) Copper Forming
8. ( ) Electric and Electronic Components
9. (x) Electroplating
10. ( ) Explosives Manufacturing
11. ( ) Iron and Steel
12. ( ) Mechanical Products
13. ( ) Inorganic Chemicals
14. ( ) Gum and Wood Chemicals
15. ( ) Foundries
16. ( ) Leather Tanning and Finishing
17. ( ) Nonferrous Metals
18. ( ) Ore Mining
19. ( ) Organic Chemicals
20. ( ) Paint and Ink
21. ( ) Pesticides
22. ( ) Petroleum Refining
23. ( ) Pharmaceuticals
24. ( ) Photographic Supplies
25. ( ) Plastic and Synthetic Materials
26. ( ) Plastics Processing
27. ( ) Porcelain Processing
28. ( ) Printing and Publishing
29. ( ) Pulp and Paper
30. ( ) Rubber
31. ( ) Soaps and Detergents
32. ( ) Steam Electric
33. ( ) Textile Mills
34. ( ) Timber



A-12

**C2. Other Business Activities**

1. ( ) Dairy Products
2. ( ) Slaughter/Meat Packing/Rendering
3. ( ) Food/Edible Products Processor
4. ( ) Beverage Bottler

**C3. Pretreatment devices or processes used for treating waste-Water or sludge, check if they apply:**

1. ( ) Air Floating
2. ( ) Centrifuge
3. (X) Chemical Precipitation
4. ( ) Chlorination
5. ( ) Cyclone
6. (X) Filtration
7. ( ) Flow Equalization
8. (X) Oil and Grease Separation
9. ( ) Grease Trap
10. ( ) Grit Removal
11. ( ) Ion Exchange
12. (X) Neutralization, pH correction
13. ( ) Ozone
14. ( ) Reverse Osmosis
15. ( ) Screen
16. ( ) Sedimentation
17. ( ) Septic Tank
18. ( ) Solvent separation
19. (X) Spill Protection

**20. ( ) Sump**
**21. ( ) Biological treatment**
**22. ( ) Rainwater diversion or storage**
**23. ( ) No pretreatment**
**24. ( ) Other, explain in comments.**

**C4. Attach most recent laboratory analyses to this report.**

**C5. Attach schematic with location of sampling point and Describe the location from where the samples are taken.**

**C6. Describe any changes performed with the operation since Issuing the last permit five years ago. Attach any schematic Detailing all changes in operations concerning wastewater Discharge and pretreatment operations.**

Installed a new stainless steel sludge hopper: Jan. 2005

Installed plastic walls and containment around entire

Waste Treatment area: Jan. 2005. Installed four more Filter Pres:

Plates: March 2006. Completely recoated Waste Treatment pit

and Cylinder Plating Area: June 2000. Installed containment

curb around the Sludge holding tank: June 2003.

Installed a flow meter recorder on effluent side: Jan. 2006.

## SECTION D - OTHER WASTES OR DISCHARGES

**D1. Are any liquid wastes or sludge from this firm disposed of by means other than discharge to the sewer system?**

**(X) Yes ( ) No If yes, complete section 2 and 3,**

**D2. These wastes may best be described as:**

| | Estimated lbs/year (Actual year 2005) |
|---|---|
| ( ) Acids and Alkalies | |
| (x) Heavy Metal Sludge | 163,275 |
| ( ) Inks/Dyes | |
| (x) Oil and Grease | 8,750 |
| ( ) Organic Compounds | |
| ( ) Pesticides | |
| (x) Plating Wastes | 9,700 |
| ( ) Pretreatment Wastes | |
| ( ) Solvents/Thinners | |
| (x) Other Hazardous Wastes | 5,550 |

**Specify Wastes:**

Other wastes include Chrome Contaminated Debris.

**D3. For the above checked wastes, does your company practice:**

(X) **on-site storage**
( ) **off-site storage**
( ) **on-site disposal**
(X) **off-site disposal**

**Briefly describe the method(s) of storage or disposal checked above:**

Stored in contained areas awaiting pick-up by contract hauler.

## SECTION E - P2 PRETREATMENT

**E1. Describe changes in operations which have allowed your company to benefit in quality treatment practices, upgrades to the system, best management practices.**

Installed Safety switch when diverting, sand filters shuts down making sure no water is discharged.

Installed spray rinse on Cylinder line, to reuse.

Dead rinse, eliminating chrome to be treated at Waste Treatment.

**E2. Include with this report any changes made in operations by description in writing and by way of a schematic.**

**E3. Include also with this report any changes made in water usage, wastewater flows, treatment practices, etc.**

**E4. List any changes to your current permit that you would like to see incorporated into your new permit.**

Elimination of sampling requirements for the following parameters: TTO, Cadium, Lead, Silver, Cyanide, Oil and Grease, TSS and BOD.

**In accordance with Ordinance 639, Section IV, Chapter 10.12.23 of the Municipal Code of Nashville, and 40 CFR 403.12(b)(6) or the Federal Code, this wastewater discharge permit application must be signed by an authorized official of the industrial user after adequate completion of this form and review of the information by the signing official.**

**"I certify under penalty of the law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to insure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge an 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 Anderson | Environmental Manager |
|---|---|
| **Signing Official (Print Name)** | **Title** |
| John Anderson | 4/26/06 |
| **Signing Official's Signature** | **Date** |



A-1m

Attachment A-2

# CITY OF NASHVILLE

426 NORTH MAIN
NASHVILLE, AR 71852

## INDUSTRIAL WASTEWATER DISCHARGE PERMIT
NUMBER NA003

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

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

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

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

**This permit shall become effective May 6, 2006 and shall expire at midnight on May 5, 2011.**

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

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

**By:** Larry Dunaway — **Public Works Director**

Ed Carlyle Jr. — **Pretreatment Coordinator**

**Issued this date:** May 5, 2006

## PART 1 – EFFLUENT LIMITATIONS

**A.** During the period of May 6, 2006 and May 5, 2011, the permitted is authorized to discharge process wastewater to the City of Nashville sewer system from the outfall listed below:

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

**B.** During the period of May 6, 2006 and May 5, 2011 the discharge from outfall NA003 shall not exceed the following effluent limitations. Effluent from this outfall shall consist of only process wastewater generated from the metal plating of pistons, cylinders, and honing of crankcases.

| Parameter | CFR Daily Limit * | CFR Monthly Limit * | Daily CWF * | Monthly CWF * | Local Daily Limit * | Final Daily Limit * | Final Monthly Limit * |
|---|---|---|---|---|---|---|---|
| Flow | N/A | N/A | N/A | N/A | N/A | Report 1 | N/A |
| pH | N/A | N/A | N/A | N/A | see note below | see note below 2 | N/A |
| BOD5 | N/A | N/A | N/A | N/A | 250 ** | 250 ** | N/A |
| TSS | N/A | N/A | N/A | N/A | 250 ** | 250 ** | N/A |
| Cadmium (T) | 0.11 | 0.O7 | N/A | N/A | N/A | 0.11 | 0.07 |
| Chromium (T) | 2.77 | 1.71 | N/A | N/A | N/A | 2.77 | 1.71 |
| Copper (T) | 3.38 | 2.07 | N/A | N/A | N/A | 3.38 | 2.07 |
| Cyanide (T) | 1.20 | 0.65 | N/A | N/A | N/A | 1.20 | 0.65 |
| Lead (T) | 0.69 | 0.43 | N/A | N/A | N/A | 0.69 | 0.43 |
| Nickel (T) | 3.98 | 2.38 | N/A | N/A | N/A | 3.98 | 2.38 |
| Silver (T) | 0.43 | 0.24 | N/A | N/A | N/A | 0.43 | 0.24 |
| Zinc (T) | 2.61 | 1.48 | N/A | N/A | N/A | 2.61 | 1.48 |
| TTO | 2.13 | N/A | N/A | N/A | N/A | 2.13 | N/A |
| Oil and grease | N/A | N/A | N/A | N/A | 100 | 100 | N/A |

* All concentrations are in mg/L unless otherwise noted

1 Please complete and submit a discharge flow report for each self-monitoring event performed. A copy of the discharge flow report is attached at the end of this permit.

2 Any wastewater having a pH less than 5.5 standards units or having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the City of Nashville is a direct violation of this permit.

** The 250 mg/L limit for BOD5 and TSS are expressed as a surcharge limit. Surcharging for excessive BOD and TSS loadings shall be in accordance with City Ordinance 640 of 1993.

## Part 2 – MONITORING REQUIREMENTS

**A. From the period beginning on the effective date of the permit until May 5, 2011 the permittee shall monitor outfall NA003 for the following parameters, at the indicated frequency:**

| Sample Parameter | Measurement Location | Frequency | Sample Type |
|---|---|---|---|
| Flow | 2" shut-off valve NA003 | Each sampling event | NA |
| pH | 2" shut-off valve NA003 | daily | Individual Grab (3) |
| BOD5 | 2" shut-off valve NA003 | Twice per year | Time Composite (3) |
| TSS | 2" shut-off valve NA003 | Twice per year | Time Composite (3) |
| Cadmium (T) | 2" shut-off valve NA003 | Twice per year | Time Composite (3) |
| Chromium (T) | 2" shut-off valve NA003 | Once per quarter | Time Composite (3) |
| Copper (T) | 2" shut-off valveNA003 | Twice per year | Time Composite (3) |
| Cyanide (T) | 2" shut-off valve NA003 | Twice per year | Individual Grab |
| Lead (T) | 2" shut-off valve NA003 | Twice per year | Time Composite (3) |
| Nickel (T) | 2" shut-off valve NA003 | Once per quarter | Time Composite (3) |
| Silver (T) | 2" shut-off valve NA003 | Twice per year | Time Composite (3) |
| Zinc (T) | 2" shut-off valve NA003 | Twice per year | Time Composite (3) |
| TTO(1) | 2" shut-off valve NA003 | Once per Year (2) | Time Composite (3) |
| Oil and Grease | 2" shut-off valve NA003 | Twice per year | Individual Grab |

1 The permittee is required to test and sample for all TTO compounds listed under 40 CFR 433.11 (e)

2 at a frequency listed above, once per year, or if needed, at a frequency determined by the Pre-treatment Coordinator in the case of noncompliance. In lieu of required monitoring for TTO, Permittee may submit a Toxic Organic Management Plan for approval by the Permitting Authority. <u>However, the permittee shall test for TTO once during the life of their wastewater discharge permit. Volatile Organics for TTO sampling shall consist of a minimum of four (4) individual grabs collected during the hours of operation. All other are to be collected using the time composite sampling method.</u>

3 Time Composite sampling shall be based on hours of operation (e.g. 4, 8, 12, 16, etc.)

Note: Wastestream NA003 is considered a continuous discharge to the sanitary sewer system.

**B. All handling and preservations of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit.**

A-2c

## PART 3 – REPORTING REQUIREMENTS

### A. Self-Monitoring Reports

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

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

**All self-monitoring reports are to be submitted by the permit holder to the Controlling Authority (City of Nashville) within ten (10) days of receiving the report from the permit holders contract laboratory. This date may be monitored by the date of the analytical report.**

### C. Additional Self-Monitoring

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

### D. Automatic Resampling

**If sampling performed by the permittee indicates a violation, the permittee shall:**

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

### E. Accidental Discharge Report

1. **The permittee shall notify the City of Nashville immediately upon the occurrence of an accidental discharge of substances prohibited by Section II 10.12.08 of Ordinance 639 of 1993 or any slug loads or spills that may enter the public sewer. During normal business hours the**

**City of Nashville Industrial Pretreament Coordinator should be notified by telephone at (870) 557-0812. The notification shall include location of the discharge, volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, State, or Federal laws.**

**Within five days following an accidental discharge, the permittee shall submit to the City of Nashville, Pretreatment Division, a detailed written report. This report shall specify:**

a. **Description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the permitttee's compliance status. The description should also include location of discharge, type, concentration, and volume of waste.**

b. **Duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is reasonably expected to occur.**

c. **All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.**

**F. Submission of Reports**

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

**City of Nashville**
**Pretreatment Department**
**426 North Main**
**Nashville, AR 71852**

**G. Certification Statement/Signatory Requirement**

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

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

**for submitting false information, including the possibility of fine and imprison ment for knowing violations."**

## PART 4 – RIGHT OF ENTRY

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

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

**B. Entry Denial**

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

## PART 5 – CONFIDENTIAL INFORMATION

**A. Information and data on a user obtained from reports, questionnaires, permit application, permits and monitoring programs and from inspect-tions shall be available to the public without restriction unless the user specifically requests and is able to demonstrate to the satisfaction of the**

City that the release of such information would divulge information processes or methods of production entitled to protection as trade secrets of the users.

B. When requested by the person furnishing a report, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public but shall be made available to governmental agencies for use related to this permit, the National Pollutant Discharge Elimination System (NPDES) permit, state disposal system permit and/or the pretreatment programs; provided, however, that such portions of a report shall be available for use by the state or any state agency in judicial review or enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics will not be recognized as confidential information.

## PART 6 – SAMPLING/ INSPECTIONS

The City of Nashville Pretreatment Department, will conduct at the minimum of once per year, an inspection and sampling visit on each significant industrial user permitted by the City. The City of Nashville shall at its discretion, select or approve an independent firm or laboratory to analyze for effluent characteristics deemed necessary. The cost for the analysis shall be at the expense of the permittee.

Any sampling required to support the industrial waste pretreatment program, or discrete sampling done for investigative purpose of a specified discharge shall also be at the expense of the permtttee. Sample collection shall be taken as required herein and shall be representative of the volume and nature of the effluent discharge. All samples shall be collected at the monitoring points(s) specified in this permit.

## PART 7 – GENERAL DISCHARGE PROHIBITIONS

A. The permittee shall not discharge wastewater containing any of the following substances from any outfall, unless authorized by the Director of Public Works:

1. No industrial user shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes pass through or interference. These general prohibitions apply to all industrial users of the POTW whether or not they are subject to categorical pretreatment standards or requirements. Furthermore, no industrial user may contribute the following substances to the POTW:

a. Pollutants which create a fire or explosive hazard in the municipal wastewater collection and POTW, including but not limited to wastestreams with closed-cup flashpoint

of less than 140.F (60.0C) using the test methods specified in 40 CFR 261.21.

b. Solid or viscous substances which may cause obstruction to the flow in a sewer or other interference with the operation of the wastewater treatment facilities such as, but not limited to:

Grease, garbage with particles greater than one-half inch (1/2") in any dimension, animal guts or tissues, paunch, manure, bones, hair, hides or flashings, entrails, whole blood, feathers, ashes, cinders, sand, spent lime, stone or marble dust, metal, glass, straw, shaving, grass clippings, rags, spent grains, spent hops, chemical residues, paint residues, septic tank solids, residues from oil, mud, glass grinding or polishing wastes, petroleum oil, non-bio-gradable cutting oil or products of mineral oil.

c. Any wastewater having a pH less than 5.5 standard units or having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the POTW.

d. Any wastewater containing toxic pollutants in sufficient quantity, either singly or by interaction with other pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of the POTW, or to exceed the limitation set fourth in a categorical pretreatment standard. A toxic pollutant shall include but not be limited to any pollutant identified pursuant to Section 307 (a) of the Act.

e. Any noxious or malodorous liquids, gases, or solids which either singly or interaction with other wastes are sufficient to create a public nuisance or hazard to life or sufficient to prevent entry into the sewers for maintenance and repair.

f. Any substance which may cause the POTW's effluent or any other product of the POTW such as residues, sludge's, or scum's to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged into the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines or regulations developed under Section 405 of the ACT, or with any criteria, guidelines or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substance Control Act or State criteria applicable to the sludge management method being used.

g. Any substance which will cause the POTW to violate its NPDES and/or State "Discharge" system permit or the receiving water quality standards.

h. Any wastewater with objectionable color not removed in the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions.

i. Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in interference, but in no case wastewater with a temperature at the introduction into the POTW, which exceeds 65 C (150F), or in such quantities that the temperature at the treatment plant exceeds 40.0 C (140 F).

j. Any wastewater containing pollutants including oxygen demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with either the POTW; or any treatment or sludge process; or which will constitute a hazard to humans or animals.

k. Any wastewater which causes a hazard to human life or creates a public nuisance.

m. Any wastewater which may contain strong acid, iron pickling wastes or concentrated plating solutions whether neutralized or not.

n. Any waste containing garbage unless it is shredded to a degree that all particles can be readily transported by the flow conditions normally prevailing in public sewers. Particles greater than one half (1/2) inch in any dimension are prohibited.

o. The City Code Enforcement Inspector is entitled to review and approve the installation and operation of any garbage grinder equipped with a motor greater than three-fourths (3/4) horse power (0.76 HP metric) except for residential installations.

p. No user shall discharge into the public sewer system any storm water, surface water, ground water, roof runoff, subsurface drainage, or any unpolluted industrial process water.

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

pollutants, except at discharge points designated by the POTW.

B. Dilution of discharges prohibited

No user shall ever increase the use of process water or, in anyway, attempt to dilute a discharge as partial or complete substitute for adequate treatment to achieve compliance with the limitation contained in the Federal Categorical Pretreatment Standards, or in any other pollutants specific limitation developed by the City or State.

The permittee shall comply with all other applicable laws, regulations, standards, and requirements contained in the City of Nashville Sewer Use Ordinance, and any applicable State and Federal Pretreatment laws that may become effective during the term of this permit.

## PART 8 – SPECIAL CONDITIONS

A. Pretreatment Facilities

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

B. Report on changed conditions

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

C. Record Keeping

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

D. Re-opener Clause

This permit may be reopened and modified to incorporate any new or revised requirements resulting from the City of Nashville Re-evaluation of its local limits.

**This permit may be reopened and modified to incorporate any new or revised requirements contained in a National Categorical Pretreatment Standard that may become promulgated.**

**E. Bypass**

**a. Definitions: (1) Bypass means the intentional diversion of waste-streams from any portion of an Industrial User's treatment facility. (2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.**

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

**c. Notice. (1) If an Industrial User knows in advance of the need for a bypass, it shall submit prior notice to the Control Authority, if possible at least ten days before the date of the bypass. (2) An Industrial User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Control Authority within 24 hours from the time the Industrial User becomes aware of the bypass. A written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass. The Control Authority may waive the written report on a case by case basis if the oral report has been received within 24 hours.**

**d. Prohibition of bypass. (1) Bypass is prohibited, and the Control Authority may take enforcement action against an Industrial User for a bypass, unless; (i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; (ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime or preventive maintenance; and (iii) The Industrial User submitted notices as required under paragraph (c) of this section. (2) The Control Authority may approve an anticipated bypass, after considering its adverse effects, if the Control Authority determines that it will meet the three conditions listed in paragraph (d)(1) of this section.**

## PART 9 – ENFORCEMENT

### A. Fines

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

### B. Suspension

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

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

### C. Termination

**Wastewater discharge permits may be terminated for the following reasons:**

1. **Violation of permit conditions.**
2. **Failure to accurately report the wastewater constituents and characteristics of its discharge.**

3. Failure to report significant changes in operating or wastewater constituents and characteristics.
4. Refusal of reasonable access to the user's premises for the purpose of inspection, monitoring or sampling.

## PART 10 – SURCHARGES AND FEES

### A. Surcharges

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

### B. Fees

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

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

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

**On this date, May 5, 2006, Jan-Eze Plating, located at 100 Mission Drive, Nashville, Arkansas, was hand delivered the attached Wastewater Discharge Permit (NA003) and Permit Invoice.**

**Name of Company Representative receiving document:**

John Anderson

**Title:** **Date:**

Environmental Manager 5/05/06

**Name of City Representative delivering document:**

Ed Carlyle Sr.

**Title:** **Date:**

Pretreatment Coord. May 5, 2006

**xc: Jan-Eze Plating Pretreatment file**

A-2 N

Attachment A-3

NASHVILLE PUBLIC WORKS

# INDUSTRIAL USER INSPECTION REPORT

**Inspection Date:** 06-01-09 **Inspection Time: Start** 1:00 **Finished** 2:00

I. TYPE OF INSPECTION

A. Scheduled: XX Un-scheduled: Demand:

II. GENERAL INFORMATION

A. Company Name: Jan-Eze Plating

B. Company Mailing Address: 100 Mission Drive

C. Company Street Address: 100 Mission Drive

D. Year Operations Began: 1986

E. Name of Authorized Representative: Larry Franappel

Title or Position: Plant Manager

Telephone Number: 870-845- 5134

F. Name of Pretreatment Contact: John Anderson

Title or Position: Environmental Technician

Telephone Number: 870-845- 5134

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

| | |
|---|---|
| **Name: John Anderson** | **Name:** |
| **Title: Environmental Technician** | **Title** |
| **Name:** | **Name:** |
| **Title:** | **Title:** |

H. **Number of Employees: 35**

**Number of Shifts: three Times. 6:00 until 2:00 Monday thru Friday**
**2:00 until 10:00 Monday thru Friday**
**10:00 until 6:00 Monday thru Friday**

**Days per Week: 5**

## III. PRODUCT/SERVICE INFORMATION

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

**Applying chrome or nickel to cylinders for chainsaws or lawn blowers, and also huge cylinders for big equipment**

B. **Principal raw material used: Chrome and Nickel, acids, polymers, soaps, cleaners**

C. **Principle products produced: Products are not produced at this plant, just metal plated.**

D. **List all processes occurring at the facility: chromating, nickel plating, neutralization, rinsing, scrubbing, cleaning,**

## IV. WATER SOURCE INFORMATION

A. **Water Supply From Where?**

**Public Water Supply: XX** **Account Number: 06- 5140-00, 06-5130-00**

**Is there a water Meter? Yes XX No If yes, give the name or company which is supplying the water: City of Nashville, 426 North Main, Nashville, AR 71852**

**Private Well – Location: Non-applicable**

**Surface Water – Location: Non-applicable**

**B. Average Monthly Water Usage: 2" Meter – 2" 549,000 1" 45,000**

**C. How was water usage obtained: City Hall – Public Works**

## V. WASTEWATER INFORMATION

**A. Discharge Classification: Metal Finisher**

**Categorical Waste Stream (40 CFR): 40CFR 433.17**

**Existing or New Source: New Source**

**Other:**

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

**If Yes, specify Annual Production Rates: Non-Applicable**

**C. Sampling Information:**

**Number of Outfall(s): 1 (NA003)**

**Describe location of Outfall(s): There is a tank, small and white, and round located directly underneath the Floc machine, It has a locking rod which can lock the sampling tube and city sampling line to prevent anyone from pulling the sample line from the tank. On the large tank is the number NA003 as a sampling identification pin point.**

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

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

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

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

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

**D. Is a certified laboratory used for wastewater analyses? Yes XX No**

**If yes, give name and address: Rineco Analytical Services**

**819 Vulcan Road - Haskell**

**Benton, AR 72105**

## VI. PRETREATMENT

**A. Does IU have updated pretreatment technology? Yes XX No**

**You will find this information in last inspection records**

**B. Does the IU require a licensed operator for it's pretreatment system? Yes No XX If yes, give classification and number:**

**C. Is the IU operating under a compliance schedule to install pretreatment technology or otherwise attain compliance with applicable standards? Yes No XX If yes, describe:**

**D. Does the IU generate any sludge or residuals as a result of its operations? Yes XX No If yes, describe: They do generate sludge which is dried by a furnace and put into totes and sent off. They are in the process and getting a new system installed at a later date.**

**F. Are waste manifest available? Yes XX No**

## VIII. WASTE GENERATED/ACCIDENTAL SPILL PREVENTION

**A.** **Does the IU generate waste process material such as spent solvents, acids, oils, etc? Yes No XX If yes, classification of the waste:**

**B.** **Does the IU have a designated or centralized area for the storage of hazardous waste? Yes XX No If yes, describe the location: In storage at the rear end of plant on in a bermed area. Stored in totes and each tote is marked.**

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

**Is the material which is stored, protected by any type of containment structure? Yes XX No If yes, describe: There is a bermed located completely around the whole area with a drain cover to direct any spill back to the waste treatment area holding tank below ground level.**

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

**How is the waste product disposed of?**

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

**Date plan became effective: September 2006 Date revised: June 1, 2007**

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

**Located where:**

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

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

**Describe? Jason King a previous employee of the City of Nashville was hired and accidentally spilled a slug load of treated chrome on**

**the city sewer system which was out of limits by a large amount. He has been terminated since.**

**H. Does the IU keep records of accidental spill events? Yes XX No**

**I. Has the IU submitted MSDS on all products used within the facility? Yes XX No**

**J. Are these products identified within the ASP? Yes XX No**

## IX. SLUG CONTROL

**A. Does the IU have a Slug Control Plan? Yes _ No XX**

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

**B. Date slug control plan was submitted: Non-Applicable**

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

1. **Has the industrial user ever been responsible for accidental discharges that affected the POTW?**
    a. **If so, what was the outcome?**
    b. **What measures have been taken to prevent occurrence?**
    c. **Were the discharges properly reported to the POTW?**

        **Yes No Non-applicable**

2. **Has the industry's treatment process been reliable? Yes XX No**
3. **Are they able to maintain compliance on a consistent basis? Yes XX _ No**
4. **Is their treatment subject to frequent overloads due to inadequate sizing or highly variable production? Yes No XX**

5. **Have procedures at the industry made it necessary to bypass treatment at any time? Yes No XX**

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

   a. **Are bulk chemicals stored in areas where they could possibly enter the collection system? Yes No XX**
   b. **Are there open floor drains in the storage areas? Yes No XX**
   c. **Do material handling and transfer procedures make an accidental discharge possible? Yes No XX**
   d. **How are wastes conveyed to the treatment system?**
   e. **Is it possible for foreign wastes to accidentally enter a treatment unit and upset the system? Yes No XX**
   f. **For industries that have segregated waste-streams requiring separate treatment technology, what steps are taken to keep those waste-streams from accidentally commingling?**

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

**1. Cleanliness: Good XX Fair Poor**
**2. Containment structures: Good XX Fair Poor**
**3. Storage areas: Good XX Fair Poor**
**4. Chance of Slug Potential: Good Fair Poor XX**

**Comments: This company has good management in all areas. They are Environmentally concern about water and air. They are always changing toward a greater goal in achievement.**

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

**F. Date of Last Slug Control Questionnaire: March 27, 2006**

## X. POLLUTION PREVENTION

**A. Have any changes been made to reduce or eliminate any wastewater discharge? Yes XX No If yes, describe: There new system which captures chrome and allows them to reuse it saves them money and they also have saved water by using it over in the rinse cycles.**

**B. List all operations that are currently considered closed looped systems?**

**C.** **Have any operating procedures been improved? Yes _ No XX If yes, describe:**

**D.** **Is the IU aware of the concept of Best Management Practices? Yes XX No**

**E.** **Has the IU been given a Best Management Plan? Yes No XX**

**F.** **Has your company inherited pollution prevention practice' such as production modifications, operational changes, material substitutions, water conservation and other such measures? Yes XX No If yes, describe them: See modifications above**

**G.** **Has the Pretreatment Inspector explain the concept of Best Management Plan and Preventive Maintenance to the company contact? Yes XX No**

## XI. INSPECTOR'S COMMENTS

**A.** **Describe all deficiencies noted during the inspection:**

**None, I looked and looked at chain of custodys, looked in the plant for any wrong doings or anything our of place, they were not really operating much at this time. Everything looked good from this inspectors eyes.**

**B.** **Describe all recommendations made during the inspection:**

**Like always I think John needs a computer, he says Larry does all his reports so he does not need one. I wish he had a bigger office, but John is satisfied with what he has. John does have an Advanced Class I License in Industrial and the other two wastewater operators are working on getting certified. Told John they need to apply for any environmental award they can get their hands on.**

**C.** **Inspectors Signature:** _____

**Ed Carlyle, Jr.**

**Title: Pretreatment Coordinator**
**Date: June 12, 2009**

Attachment A-4

# AN ACCIDENTAL SPILL PREVENTION / RESPONSE PLAN

General Information Date: 06/01/07

Facilities Name Jan-Eze Plating, Inc.
Address 100 Mission Drive
Nashville, AR 71852

ASP / R Plan contact John Anderson Title Environmental / Safety Manager

Work Phone Number 870-845-5134 After Hours Phone Number 870-845-1974

Secondary Contact Joe Ashford Title Production Manager

Work Phone Number 870-845-5134 After Hours Phone Number 870-286-2093

Type of Business / Manufacturer Hard Chrome Plating / Nickel Plating

Operating Schedule Monday - Friday 24 hours, 3 shifts 24 hours, 7 days / week, 4 shifts

Number of Employees 1st Shift 34 2nd shift 10 3rd shift 7 4th shift 20

Average daily discharge of wastewater (Identify continuous and batch discharges).
Continuous; approximately 21,000 GPD

Description of previous spill events and remedial measures taken to prevent their reoccurrence.
None

Description of provisions and warning signs at the facility.
Gates at driveway locked when no one is working at plant. All doors locked at 4:30 p.m. until 5:30 a.m.
Signs on doors saying employees only . No trespassing and no loitering posted on front gate.

## II. FACILITY LAYOUT AND FLOW DIAGRAMS

Attach drawings of the facility which show the following:

* General layout of the facility
* Entrance and exit routes to facility
* Hazardous materials process and storage areas
* Loading and unloading areas
* Direction of drainage from hazardous material and waste handling, process, storage and treatment areas
* Floor drains, pipes and channels which lead away from potential leak or spill areas [ identify by coding, footnotes, or narratives where these drain to (e.g., sanitary sewer, holding tank pumped out by hazardous waste hauler, etc.)].
* Low diagram(s) showing chemical and wastewater flow including piping and instrumentation, flow rates, tanks and capacities, treatment systems and final designations of flows.

Please provide narrative discussions where needed to clarify any of the above items. See drawing of facility.

| III. | HAZARDOUS MATERIAL | LOCATION IN PLANT | CONTAINER VOLUME | TYPE OF CONTAINER | REMARKS |
|---|---|---|---|---|---|

See attached page.

1
The facility should provide information on the type of container or tank used (e.g., steel drum, fiberglass carboy, etc.) And the materials of construction of the container or tank.
2
Remarks should include comments concerning the toxicity or hazards associated with the hazardous material and any special precautions needed to handle the material properly. The remarks should also include brief discussions of the compatibility on the materials, of construction of container or tank with it's contents, the condition of the container and whether it is open or closed top. See Material Safety Data Sheets.

## IV. SPILL AND LEAK PREVENTION AND PROCEDURES

### Equipment

Identify the location and provide a description of all spill prevention structures and equipment employed (such s dikes, berms, sealed drains, alarms, leak detection equipment at the facility, diversionary structures, etc.). Reference to the location should be made with the layout drawings required in the previous section. See attached sheets.

### Procedures

Discuss all routine operation and maintenance processes geared to minimize spills and leaks at the facility. Include descriptions of the type and frequency of inspections and monitoring for leaks or other conditions that could lead to spills. See contingency plan and attached page.

## V. EMERGENCY RESPONSE EQUIPMENT AND PROCEDURES

### Equipment

Provide an up-to-date list of available emergency response equipment including it's location (the location can be indicated on the facility layout) and a physical description. This list of equipment should include the following:

* Spill containment and control equipment and tools
* Spilled material storage containers
* Protective clothing and respirator
* First aid kits
* Decontamination equipment

IV. SPILL AND LEAK PREVENTION AND PROCEDURES (cont.)

There are 4 ½ " High containment ditches that surround the piston line, the cylinder line and the chemical storage room. The floors of each of these containment ditches have been coated with a chemical proof coating for protection against spills and leaks.

The waste treatment pit which holds all wastewater holding tanks and concentrate tanks is a 17' x 15' x 12' pit which has the chemical proof coating on the floor and walls.

The steel line also is above a large pit 22' x 7 ½ ' x 11' deep and small pit 18 ½ ' x 6' x 2' deep pit with the chemical coating on the floor and walls also.

VII. TRAINING PROGRAM (cont.)

Jan-Eze Plating has an orientation program that each employee must attend before being subjected to the plating shop. This program includes a Hazard Communications Video as well as a thorough discussion of our Hazard Communication Program, Lockout / Tagout procedures, use of fire extinguisher, personal protection equipment and our Electrical Safety Work Practice Policy.

A-4c

| HAZARDOUS MATERIAL | LOCATION IN PLANT | CONTAINER VOLUME | TYPE OF CONTAINER | REMARKS |
|---|---|---|---|---|
| 1. Sulfuric Acid | Chemical Storage Room | 55 gal | Plastic; closed top | The tanks containing nitric and sulfuric on the plating lines are 50% nitric, 25% sulfuric, 25% H20. The 1000 gallon tanks in the waste treatment pit contain undetermined amounts of each of these three chemicals as they are spent and/or contaminated. Also in these tanks are rinse waters from spray rinse tanks and cold water rinse tanks from non-hazardous chemicals such as soaps and adhesion enhancers. |
| | Piston Line | 374 gal., 190 gal. | Steel tanks with plastic liners; open top | |
| | Cylinder Line | 260 gal., 174 gal | Steel tanks with liners; open top | |
| | Waste Treatment Pit | 1,000 gal. | Polypropylene; open top | |
| 2. Nitric Acid | Nitric Storage Room | 5000 gal. | Stainless steel; closed top | |
| | Chemical Storage Room | 55 gal | Stainless steel; closed top | |
| | Piston Line | 374 gal., 244 gal | Steel tanks with plastic liner; open top | |
| | Cylinder Line | 260 gal., 174 gal | Steel tanks with plastic liner; open top | |
| | Waste Treatment Pit | 1000 gal. | Polypropylene; open top | |
| 3. Chromic Acid | Steel Line | 4048 gal. | Steel tanks with plastic liner; open top | |
| | Cylinder Line | 4,050 gal. | Steel tanks with liners; open top | |
| | Chemical Storage Room | 100 lb. | Cardboard container / metal container; closed top | |
| | Waste Treatment Pit | 1000 gal. | Polypropylene; open top | |

A-4d

* Ventilation equipment

Procedures

Provide a detailed description of procedures to be followed in responding to a spill at the facility. This description should cover the following: See contingency plan.

* Notification of facility personnel responsible for responding to spills
* Chain of command for spill response
* Evacuation procedures
* Notification of response agencies and contractors
* Spill assessment and response procedures
* Procedures for preventing contact between incompatible materials
* Procedures for disposing or treating spilled materials

## VI. SPILL REPORTING AND ASP/R MODIFICATIONS PROCEDURES

Describe procedures for reporting spills (attach any forms used) and for modifying the ASP/R Plan where procedures were inadequate or where changes at the facility warrant modification. See contingency plan.

## VII. TRAINING PROGRAM

Outline in detail, the training program given to employees which will enable them to understand the processes and materials with which they are working, the safety and health hazards and the procedures and practices for preventing and responding to spills. A discussion of the practices for preventing and responding to spills. A discussion of the appropriateness of training provided to each employee or group of employees (e.g., chemical handling personnel, plating department supervisor/personnel, etc.) Should also be include. See attached page.

## VIII.

I certify that the information in this document is to the best of my knowledge true and that the accidental spill prevention measures described in this document will be implemented as described.

John Ada / Environmental Safety Manager — 6/12/07

Name / Title — Date

Attachment A-5

# JAN-EZE PLATING INC.

Toland Industrial Center
P.O. Box 594 • Nashville, Arkansas 71852

Toxic Organic Management Plan
for Jan-Eze Plating, Inc.

Substances at Jan-Eze Plating that are subject to the solvent Management plan are as follows:

I. Kerosene - Kerosene is used at Jan-Eze Plating as a parts cleaning solution. It is primarily used during maintenance activities for greasy parts. There is approximately 3 gallons of kerosene in a l6 gallon container which is stored just outside the chemical storage room. The kerosene in this container is added to when necesary, not disposed of. Due to the location of the Kerosene, its use at Jan-Eze Plating, and the amount kept on site, Kerosene cannot be reasonably expected to enter any wastestreams to the city sewer system.

2. Hydraulic Oil - Hydraulic oil is used in the honing machines in the hone room at the cylinder area. This oil is contained in a closed loop hydraulic system. A 55 gal. drum of hydraulic oil is stored in the cylinder line rectifier room. This oil is used as make up in the machines if the oil levels get low.

The location of this oil and its use at Jan-Eze is such that it cannot be reasonally expected to enter any wastestream to the city sewer system.

3. Honing Oil- Honing oil is used in the honing machines in the hone room also. This oil is pumped from a reservoir onto the cylinder to prevent heat build up during the honing process. It then drains back into the reservoir to be pumped back up to the cylinder. It is a closed loop system also. After the honing process is completed, the cylinders are submerged in a de-oiling solution. The oil that collects in this solution is skimmed off of the top and put into a drum and hauled off as hazardous waste.

4. Lube Solution for Federal Products Surfanalyzer kit. This product contains Trichlorotriflouroethane and heavy Naphthenic Petroleum distillates. This product is stored in a 2 oz. container in the surfanalyzer room which is a room where Quality Control work is performed. This solution is used one drop at a time for Lubricating the Surfanalyzer as necessary. Due to the location and use of this product, it cannot be reasonably expected to enter any wastestreams to the city sewer system.

5. Cleaning solution for Federal Products Surfanalyzer kit. This product contains l,l,l - trichloroethane. This product is stored in a 2 oz. container in the Surfanalyzer Room with the Lube solution. Both bottles are in a hard plastic case for storage. This solution is also used by the drop as needed for cleaning the Surfanalzer. Due to the location and use of this product at Jan-Eze, it cannot be reasonably expected to enter any wastestream to the city sewer.

# JAN-EZE PLATING INC.

Toland Industrial Center
P.O. Box 594 • 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 premitting (or control) authority."

Frank Hetzl
Authorized Representative

1-13-95
Date

Frank Hetzl
Signature

Attachment A-6

JAN-EZE
PLATING INC.

100 Mission Drive · Nashville, Arkansas 71852 · (870) 845-5134 · Fax (870) 845-5168
e-mail: larry.jan-eze@cebridge.net

October 17, 2008

City of Nashville
426 N. Main
Nashville, AR 71852

Attention: Ed Carlyle, Jr.

Dear Ed:

Enclosed you will find the Forth Quarter Sample results for Jan-Eze Plating Inc. As you will see Zinc was a little high. We are re-sampling this week and I will have those results in a few days. If you have any questions, please contact me at 845-5134.

Sincerely,

John Anderson
Environmental/Safety Manager

# FOURTH QUARTER 2008

# Rineco Analytical Services

**819 Vulcan Road - Haskell**
**Benton, Arkansas 72015**
**(800) 377-4692 / (501) 778-9089**
**FAX (501) 776-5816**




## Analysis Summary

**Jan - Eze Plating, Inc.**
100 Mission Drive
Nashville, Arkansas 71852
Ph: 870-845-5134
Fx: 870-845-5168

| | | | |
|---|---|---|---|
| **Client's Project ID:** | 4th QTR Sample | **Project:** | 80231 |
| **Sampling Date:** | 10/01/08 & 10/02/08 | **Date Received:** | 10/03/08 |
| **Contact Name:** | John Anderson | **Report Date:** | 10/13/08 |

**Comments:** ND = not detected. (surr.) = surrogate: internal standard added to sample to ensure overall efficiency of the method.

Standard practice for quality control includes the use of blanks, laboratory control samples, matrix spikes and duplicates on at least 10% of samples analyzed. Standard practice for quality assurance includes compliance to USEPA guidelines for instrument maintenance and calibration.

Quality Director or Laboratory Director _____ Date 10.13.08

# Results Summary

| oject #: | 80231 | Parameter | Result | Quantitation Limit | Units | Method | Analyst | Analysis Date |
|---|---|---|---|---|---|---|---|---|
| **RAS laboratory ID:** | 289 | | | | | | | |
| **Client ID:** | Jan-EZE NA003 #1 | | | | | | | |
| | | Chromium | 0.057 | 0.007 | mg/l | EPA 200.8 | Al | 10/08/08 0847 |
| | | Nickel | 0.56 | 0.01 | mg/l | EPA 200.8 | Al | 10/08/08 0847 |
| | | Zinc | 3.1 | 0.002 | mg/l | EPA 200.7 | Al | 10/08/08 0847 |

A-6c

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 Anderson | Environmental / Safety Manager | 10/17/08 |
| Authorized Representative | Title | Date |
| Larry Trobaugh | VP - Opns | 10/17/08 |
| Qualified Professional | Title | Date |

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

| | | |
|---|---|---|
| Ed Carlyle Sr. | Pretreatment Coordinator | 10/27/08 |
| Signature | Title | Date |

AG

JAN-EZE
PLATING INC.

100 Mission Drive · Nashville, Arkansas 71852 · (870) 845-5134 · Fax (870) 845-5168
e-mail: larry.jan-eze@cebridge.net

October 30, 2008

City of Nashville
426 N. Main
Nashville, AR 71852

Attention: Ed Carlyle, Jr.

Dear Ed:

Enclosed you will find the Forth Quarter Sample of zinc we re-sampled for Jan-Eze Plating, Inc. After discussing this with you, you told us to sample zinc a third time. I am sampling again and will have those results in a few days. If you have any questions, please contact me at 845-5134.

Sincerely,

John Anderson
Environmental/Safety Manager

A-6e

**Rineco Analytical Services**
819 Vulcan Road - Haskell
Benton, Arkansas 72015
(800) 377-4692 / (501) 778-9089
FAX (501) 776-5816



## Analysis Summary

**Jan - Eze Plating, Inc.**
100 Mission Drive
Nashville, Arkansas 71852
Ph: 870-845-5134
Fx: 870-845-5168

| | | | |
|---|---|---|---|
| **Client's Project ID:** | 4th QTR Sample | **Project:** | 80239 |
| **Sampling Date:** | 10/15/08 & 10/16/08 | **Date Received:** | 10/20/08 |
| **Contact Name:** | John Anderson | **Report Date:** | 10/21/08 |

**Comments:** ND = not detected. (surr.) = surrogate: internal standard added to sample to ensure overall efficiency of the method.

Standard practice for quality control includes the use of blanks, laboratory control samples, matrix spikes and duplicates on at least 10% of samples analyzed. Standard practice for quality assurance includes compliance to USEPA guidelines for instrument maintenance and calibration.

Quality Director or
Laboratory Director W J Emmons Date 10-28-08

# Results Summary

| Project #: | 80239 | Parameter | Result | Quantitation Limit | Units | Method | Analyst | Analysis Date |
|---|---|---|---|---|---|---|---|---|
| RAS laboratory ID: | 319 | | | | | | | |
| Client ID: | Jan-EZE NA003 #1 | | | | | | | |
| | | Zinc | 0.18 | 0.002 | mg/l | EPA 200.7 | AI | 10/27/08 0948 |

A-69

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 Ackerman | Environmental/Safety Manager | 10/30/08 |
| Authorized Representative | Title | Date |
| Larry Schumacher | G.M./V.P. | 10/30/08 |
| Qualified Professional | Title | Date |

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

| | | |
|---|---|---|
| Ed Carlyle Sr. | PRETREATMENT COORD. | 10/31/08 |
| Signature | Title | Date |

A-6h

ICIS NPDES: Add Inspection - Windows Internet Explorer

https://icis.epa.gov/icis/inspection/AddSpecialPrograms.do

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check AutoLink AutoFill Send to Settings

ICIS NPDES: Add Inspection

Page Tools

Integrated Compliance Information System ICIS NPDES

HOME
HELP
LOGOUT

## Special Programs

Pretreatment

### Significant Industrial Users (SIUs)

| | |
|---|---|
| SIUs: | 2 |
| SIUs Without Control Mechanism: | 0 |
| SIUs Not Inspected: | 0 |
| SIUs Not Sampled: | 0 |
| SIUs in SNC with Pretreatment Standards: | 0 |
| SIUs in SNC with Reporting Requirements: | 0 |
| SIUs in SNC with Pretreatment Schedule: | 0 |
| SIUs in SNC Published in Newspaper: | 0 |
| SIUs on Schedules: | 0 |
| Violation Notices Issued to SIUs: | 0 |
| Administrative Orders Issued to SIUs: | 0 |
| Civil Suits Filed Against SIUs: | 0 |
| Criminal Suits Filed Against SIUs: | 0 |

### Categorical Industrial Users (CIUs)

| | |
|---|---|
| CIUs: | 2 |
| CIUs in SNC: | 0 |

### Penalties

| | |
|---|---|
| Dollar Amount of Penalties Collected: $ | 0 |
| Industrial Users (IUs) from which Penalties have been collected: | 0 |

### Other Information

| | |
|---|---|
| SUO Reference: | 639 |
| SUO Date: | 3/16/93 |
| Annual Pretreatment Budget: $ | |
| Pass-Through/Interference Indicator: | NO |
| Violation of IU Schedule for Remedial Measures: | No |
| Formal Response to Violation of IU Schedule for Remedial Measures: | |

### Local Limits

| | |
|---|---|
| Date of Most Recent Technical Evaluation for Local Limits: | 10/28/05 |
| Date of Most Recent Adoption of Technically Based Local Limits: | 3/16/93 |
| Local Limit Pollutants: | As, Cd, Cr, CN, Pb, Hg, Ni, Ag & Zn |

POLLUTANTS

### Removal Credits

| | |
|---|---|
| Removal Credits Application Status: | Not Applicable |
| Date of Most Recent Removal Credits Approval: | N/A |
| Removal Credits: N/A | Arsenic, Cadmium, Chromium, Cyanide, Lead, Mercury, Nickel Silver & Zinc |

POLLUTANTS

### Acceptance of Waste

| | |
|---|---|
| Acceptance of Hazardous Waste: | No |
| Acceptance of Non-Hazardous Industrial Waste: | No |
| Acceptance of Hauled Domestic Wastes: | No |

### Deficiencies

| | |
|---|---|
| Deficiencies Identified During IU File Review: | No |
| Control Mechanism Deficiencies: | No |
| Legal Authority Deficiencies: | No |
| Deficiencies in Data Management and Public Participation: | No |
| Deficiencies in Interpretation and Application of Pretreatment Standards: | No |
| Inadequacy of Sampling and Inspections: | No |
| Adequacy of Pretreatment Resources: | Yes |

### Annual Frequency

| | |
|---|---|
| Annual Frequency of Influent Toxicant Sampling: | 4 |
| Annual Frequency of Effluent Toxicant Sampling: | 4 |
| Annual Frequency of Sludge Toxicant Sampling: | |

} metals

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

EPA U.S. Environmental Protection Agency

Trusted sites 100%

ICIS NPDES: Add Inspection - Windows Internet Explorer

https://icis.epa.gov/icis/inspection/AddInspection.do?actionMethod=initiate&epaOrState=S&CMType=INS&fromICIS

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check AutoLink AutoFill Send to Settings

ICIS NPDES: Add Inspection

Page Tools

## Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

Compliance Monitoring Activity Name: Nashville Pretreatment Program

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

* Compliance Monitoring Type: AFO Defined; AFO Designation; Aerial Photography; Audit; Audit (IU)

## * Linked Facility

| Program System Acronym | Identifier | Facility Site Name | Address | FRS ID |
|---|---|---|---|---|
| NPDES | AR 0021776 | | | |

## Compliance Monitoring Dates

Planned Start Date: 6/16/09

Planned End Date: 6/18/09

Actual Start Date: 6/16/09

Actual End Date: 6/18/09

## Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act

* Programs: NPDES - Post Administrative Penalty Case (Settlement); NPDES - Pretreatment; NPDES - Sanitary Sewer Overflow (SSO); NPDES - Section 308 Information Requests; NPDES - Sludge/Biosolids

State Statute:

* Compliance Monitoring Action Reason: Agency Priority; Citizen Complaint/Tip; Core Program; For Cause; Random Inspection

* Compliance Monitoring Agency Type: State Contractor; State - Using Federal Credential; State; Regional; Other Federal

Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist?: No

Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? State

If Joint, what was the purpose of the participation of the other party?

Which party had the lead?

## Government Contacts

| Affiliation Type | First Name | Last Name | Phone | Office | Organization |
|---|---|---|---|---|---|

## Codes

SIC Codes:

NAICS Codes:

## Priorities

OECA National Priority: 2009 - (CA Only) - Air Toxics - Flares; 2009 - (CA Only) - Air Toxics - LDAR; 2009 - (CA Only) - Air Toxics - Surface Coating; 2009 - (CA Only) - Financial Assurance; 2009 - (CA Only) - MP - Mining

Regional Priority: 2009 - Region 06 - Air Toxics Major Sources (O & G); 2009 - Region 06 - Brine Spills from Oil & Gas Operations; 2009 - Region 06 - CD Implementation; 2009 - Region 06 - Minor Wastewater Collection & Treatment System; 2009 - Region 06 - Petroleum Refining

## Media Monitored

Media Monitored:

## Compliance Monitoring Media Indicator

Multimedia Indicator:

## Compliance Monitoring Information

Number of Days Physically Conducting Activity: 3

Number of Hours Physically Conducting Activity: 21

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code:

## Compliance Monitoring Comments

Compliance Monitoring Comments:

## User Defined Fields

1:

Trusted sites 100%