ADEQ

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

October 25, 2007

Reggie Corbitt, P.E., C.E.O.
Little Rock Wastewater Utility
221 East Capitol
Little Rock, Arkansas 72202

Re: City of Little Rock (NPDES #AR0021806) Pretreatment Program Audit / Municipal Pollution Prevention (P2) Assessment

Dear Mr. Corbitt:

Please find enclosed the finished report for the audit/assessment conducted September 11th through the 13th, 2007. The contents should be made available for review by appropriate City officials. A review should be made of the required actions and recommendations. Please provide within thirty (30) days written corrective actions and comments to this office.

Little Rock Wastewater appears to have a staff keenly interested and knowledgeable of both the Pretreatment and Pollution Prevention programs and their implementation. This auditor was impressed with the professionalism and cooperation exhibited by your personnel during the audit and industry site visits. This State auditor commends them for their work ethic and performance.

Two of EPA's focal points being integrated with the National Pretreatment Program are: Pollution Prevention (P2) and partnerships between the regulators and those regulated in achieving the objectives of the Clean Water Act. It's obvious this has been a successful work in progress by LRW.

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

Feel free to contact this office with any questions.

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist
cc: Lee Bohme/EPA 6WQ-PO
Rudy Molina/EPA 6WQ-PP
Frank Esry/ADEQ Inspector Supervisor
Dennis Benson/NPDES Enforcement

PRETREATMENT PROGRAM AUDIT /

POLLUTION PREVENTION ASSESSMENT FOR

THE CITY OF LITTLE ROCK, ARKANSAS

NPDES PERMIT #AR0021806

October 25, 2007

PREPARED BY:

Allen Gilliam / ADEQ State Pretreatment Coordinator

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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) being integrated into Pretreatment Programs assessments of cities' P2 projects and programs will be made in conjunction with the audits.

An audit/assessment was performed September 11 – 13, 2007, of the Pretreatment Program implemented by the City of Little Rock, Arkansas. Participants included:

Allen Gilliam	ADEQ / State Pretreatment Coordinator (Lead)
Rufus Torrence	ADEQ / State Pretreatment Coordinator
Rudy Molina	EPA Region 6 / Permits & Tech. Section
Jeff Davis	Little Rock WW / Pretreatment Supervisor
Allen Gatlin	Little Rock WW / Industrial Inspector
Paul Foster	Little Rock WW / Industrial Inspector
Mike Murders	Little Rock WW / Industrial Inspector
Tony Roll	Little Rock WW / Industrial Inspector
Stan Suel	Little Rock WW / EAD Director
Stan Miller	Little Rock WW / Manager of Operations

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Little Rock'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

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

Little Rock's Pretreatment Program was originally approved 11/1/82. A modification was approved in September of 1987 which revised their old pretreatment ordinance to include maximum headworks concentrations and included the maximum penalty amount.

The latest Program modifications were submitted, approved and incorporated into the city's two (2) NPDES permits on 4/6/99. These modifications included a headworks loading re-evaluation with "Guideline Local Limits", an Enforcement Response Plan, revised Sewer Use Ordinance, Program narrative changes and included as a separate "working document", a Pretreatment Procedures Manual.

The Department received a certification statement from Oswald Engineering (dated 2/20/07) on behalf of Little Rock Wastewater stating, "...the existing [TBLLs] are based on current water quality standards and are adequate to prevent pass through of pollutants, inhibition of, or interference with the treatment facilities and prevent the contamination of biosolids...etc".

The City's two (2) wastewater treatment plants both consist of screening, grit removal, primary clarifiers, activated sludge, secondary clarification and chlorination before discharge to the Arkansas River.

The Adams Field POTW has a design flow of 36 MGD with an average flow of about 20 MGD. There are 19 SIUs (8 categorical) contributing approximately 10.3% of that average flow. Its sludge slurry is pumped to the Fourche Creek POTW for final treatment before land application. There has been no pattern of toxicity of its effluent shown to the receiving stream.

The Fourche Creek POTW has a design flow of 16 MGD with an average flow of about 10.6 MGD. Approximately 6.6% of that is from 17 SIUs, 8 of which are categorical. About 6,560 dry tons of sludge (almost 57% from the Adams Field POTW) is land applied per year. This POTW has also shown no pattern of toxicity to the receiving stream.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to nine (9) of their industrial users, some of them "non-discharging" categoricals. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachment(s) A.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City of Little Rock. 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 Little Rock's Pretreatment Program. Actions required by the City to comply with the pre-"streamlined" General Pretreatment Regulations (40 CFR 403) and with the City's approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

The City's deadline to submit Program modifications to be current with the "streamlining" revisions to CFR 403 has not been reached. Requirements and recommendations based on the "streamlining" revisions discussed during the exit interview will not be addressed at this time.

1) Under ***40 CFR 403.8(f)(2)(iii)***, "Notify Industrial Users identified under paragraph (f)(2)(i) of this section ["all possible Industrial Users which might be subject to the POTW Pretreatment Program"], of applicable Pretreatment Standards and any applicable requirements..."

It was not evident the City had notified its IUs revisions had been made to the pretreatment regulations. Correspondence to all affected entities should be made. Even with the revisions posted in the Federal Register, it's the City's obligation to make the notification. The website where they can locate the revisions is located @ http://cfpub.epa.gov/npdes/home.cfm?program_id=3 .

2) Revisit and confirm all interjurisdictional agreements with neighboring suburbs are parallel with the City's intent of implementing equally any and all non-domestic dischargers outside the City's jurisdictional boundaries.

An excerpt (Attachment A-14) from Shannon Hills' "Contract Agreement and Pretreatment Ordinance" (9/95) indicates its "local limits" do not parallel Little Rock's.

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

1) Recommend requesting industry/business Pollution Prevention (P2) "success stories" on at least an IU permit duration basis. While the City has integrated P2 successfully into its Pretreatment Program elements, metrics (toxics lbs reduced, gallons H2O conserved, money saved, etc) should be compiled for the City to continually summarize its past and current progress.

2) Recommend adding more information to the current IUs' fact sheets. See Appendix I of EPA's "Industrial User Guidance Manual" (9/89) for additional info to include.

3) Clarify the City's procedures/determination for testing only "a few" toxic organics at Interstate Sign, a metal finisher under CFR 433. Interstate has not submitted an approved TOMP but, the City is requiring a subset of organics "reasonably expected to be present" to be sampled/analyzed for (per CFR 433.12[a]). And, the City is analyzing the entire TTO list annually.

There seemed to be some confusion about this practice from the other ADEQ auditor.

4) Recommend notifying the hazardous waste generators (ADEQ's list provided during audit) of RCRA reporting requirements with a copy of 40 CFR 403.12(j)&(p). This list of hazardous waste generators should include dentist offices/clinics, hospitals, veterinarians, long term care facilities and photo/X-ray processors. While they may not be identified as generators by ADEQ, data from numerous reports seen nationally suggest hazardous waste is generated (unknowingly) and typically discharged to the Citys' collection systems.

5) 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 frequently "overlooked" by many IUs and control authorities throughout the State. Modifications to pretreatment/process equipment constitute such changes requiring notification in the form of updated schematics.

Not all the IUs' process descriptions or schematics found on file were drafted/drawn in enough detail in this auditor's opinion.

6) Include a more descriptive narrative of each IU's chemical handling procedures in the City's inspection reports. While transporting chemicals around their facility (with no floor drains directly to your collection system) may be out of the strict purview of 40 CFR 403, is it out of your City's purview of total environmental stewardship and employee safety concerns?

7) The City may consider the derived local limits as "Maximum Daily Limits" since local limits may be specified in the pretreatment ordinance as "instantaneous".

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

Submit Program modifications to be current with the new "streamlined" revisions to 40 CFR 403.

* * * * * * *

The City should consider the 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: Little Rock Wastewater NPDES #: AR0021806
Mailing address: 221 East Capitol, L.R. 72202

Permit Signatory(s): Perry Thornton & Walter Collins Title: Superintendents

Telephone: 501.376.2903 FAX NUMBER: 376.3541 or 688.1463

Pretreatment Contact: Jeff Davis Title: Pretreatment Supv.
Address: 1001 Temple Street
Telephone: 501.688.1547
e-mail jeff.davis@lrwu.com

Pretreatment program approval date: 11/1/82

Dates of approval of any substantial modifications: 9/1/87, 4/6/99

Month Annual Pretreatment Report Due: March

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 9/11 - 13/07 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	Pret. Coord./ ADEQ	501.682.0625
Rufus Torrence	Pret. Coord./ ADEQ	501.682.0626
Rudy Molina	NPDES Permits & Tech. Sec./ EPA R6	214.665.6731

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Jeff Davis	Pretreatment Supv.	688.1547
Allen Gatlin	Industrial Inspector	688.1528
Paul Foster	Industrial Inspector	688.1527
Mike Murders	Industrial Inspector	688.1532
Tony Roll	Industrial Inspector	688.1529
Stan Suel	EAD Director	688.1486
Stan Miller	Manager of Operations	376.2903

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	4/06	No deficiencies indicated
(Can find no earlier PCIs)		

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: _____

_____

_____

_____

_____

___	✓	Is the Control Authority currently in SNC or RNC?

. . . . . .

Note:

The file reviews (9) were conducted by Allen Gilliam, Rufus Torrence and Rudy Molina from EPA. Files reviewed by whom will be so noted (AG, RT & RM).
Industry site visits (9) were also spread among the above three (3) with City personnel. Those that conducted "oversight" on those site visits will also be duly noted.

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0021806	Adams Field	1/1/07	12/31/11
AR0040177	Fourche Creek	1/01/03	12/31/07

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Adams Field
Location Address: 1001 Temple, East of Little Rock National Airport

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 36 MGD; Actual (Average)- 20.01 MGD

Sewer System: 100 % Separate; 0 % Combined,
# of SSOs due to grease blockages 20

Industrial Contribution to this Treatment Plant

# of SIUs : 19 # of CIUs : 8
Industrial Flow (mgd): 2.06 Industrial Flow (%) : 10.3 %

Level of Treatment		Type of Process(es):
Primary	✓	Screening; grit removal; primary clarifiers;
Secondary	✓	complete mix activated sludge and secondary clarification
Tertiary		

Method of Disinfection: Chlorination

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3C Ark. River Basin

Receiving Stream Use: primary contact recreation

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.

sludge slurry is piped over to their Fourche Creek POTW for ultimate land appl.

List of toxic pollutant limits in NPDES permit: Conventionals, TRC & W.E.T.

a. (continuation of individual treatment plant information for Adams Field 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: Same
Issuance Date: "
Expiration Date: "

List pollutants that are specified in current sludge permit:
References 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?)

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

	Influent	Effluent	Sludge	Ambient
Metals *	11	11		
Priority **	2	2		
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.
Annual report graphs might indicate overall pollutant loadings have decreased since the early '90s.

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 for 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)
N/A	

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

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Fourche Creek
Location Address: 9500 Birdwood Road, L.R.

Expiration Date of NPDES Permit: Same

Treatment Plant Wastewater Flow: Design- 16 MGD; Actual (Average)- 10.59 MGD

Sewer System: 100 % Separate; 0 % Combined,
# of SSOs due to grease blockages 2

Industrial Contribution to this Treatment Plant

# of SIUs	: 17	# of CIUs	: 8
Industrial Flow (mgd):	0.7	Industrial Flow (%)	: 6.6 %

Level of Treatment		Type of Process(es):
Primary	✓	Screening; grit removal; primary clarifiers;
Secondary	✓	activated sludge and secondary clarification
Tertiary		

Method of Disinfection: Chlorination

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Seg. 3C Ark. River Basin

Receiving Stream Use: primary contact recreation

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	6559 dry *English* 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.

**It's estimated 56.8% of applied sludge is from the Adams Field POTW.*

List of toxic pollutant limits in NPDES permit: conventionals

a. (continuation of individual treatment plant information for Fourche Creek 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: Same
Issuance Date: "
Expiration Date: "

List pollutants that are specified in current sludge permit:
References 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?)

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

	Influent	Effluent	Sludge	Ambient
Metals *	11	11	12	
Priority **	1	1	2	
Biomonitoring		4		
TCLP			2	
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.
Annual report graphs might indicate overall pollutant loadings have decreased since the early '90s.

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 for 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)
City reported none	

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.

1. Modifications:

Date Approved by DEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
N/A		

2. Modifications in Progress:

Date Requested	Nature of Modification
N/A	Mod request not made yet, but City is in the process of making revisions to its entire Program to be current with "streamlining" revisions to 403

YES NO

✓ — Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:

✓ — 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: 11/1/82 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 3/16/99
Date of most recent Pretreatment Program modification approval: 4/6/99

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?

YES NO

SECTION II: PROGRAM ANALYSIS AND PROFILE

___ ✓ 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: *2 landfills (leachate) but, did no hauling in '06*

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

___ ✓ 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.	Cammack Village (city of)	0	0	Contract
2.	Shannon Hills (city of)	0	0	"
3.	Alexander (city of)	0	0	"
4.	College Station (unincorporated)	0	0	"

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	None
___	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: None

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

IU Name	Problem	NPDES Permit Violation Yes	No
_____	_____	___	___
_____	_____	___	___

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES	NO	
✓		Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *Sent initial screening form in '06. See Attachment A-1 for form and list of IUs/businesses sent form.*
✓		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? **Inspection and survey forms include P2 assessments. 2nd round of surveys are similar to their permit applications.*

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) DEQ's haz. waste list & Central Arkansas Mfg. Direct.

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. 36 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 16 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 20 Noncategorical SIUs
d. 18 Other regulated nonsignificant IUs (Describe) 2 landfill leachates & 16 low flow businesses
54 TOTAL of a. + d.

YES	NO	
✓		Has the POTW identified any IUs with Pollution Prevention opportunities?
✓*		Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(i-ii)] **Not the streamlined version yet.*

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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? **See Attachment A-2 for example application and P2 question on A-2i.*

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

What is the maximum term of the control mechanism? 5 years

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

IU NAME	PERMIT EXPIRATION DATE

YES NO

✓ ___ Does the Control Authority accept trucked septage wastes?

✓ ___ Does the Control Authority accept other trucked wastes?

✓ ___ Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

YES NO

✓ ___ Does Control Mechanism designate a discharge point? [403.5(b)(8)]

✓ ___ Are all applicable categorical standards and local limits applied to trucked wastes?

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

Pollutant	Limit
See Attachment A-3 for example permit, manifest and "policy" for petroleum contaminated wastewater	

Describe the discharge point(s) (including security procedures):
At disposal station manhole witnessed by city operator

✓* ___ Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes? **Not at present but they have in the past.*

✓ ___ 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
See Attachment A-3h thru A-3k	

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES NO

✓ ___ Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

6/07 Date Notified Letter* Method of Notification

**There's also language in the permits.*

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 NACWA

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
N/A			

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?		"Guideline" +Monthly Avg. Numerical Limit (mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓			?	✓		0.14
Cadmium (Cd)	✓			?	✓		0.2
Chromium-Total	✓			?	✓		5.0
Copper (Cu)	✓			?	✓		5.0
Cyanide (CN)	✓			?	✓		1.8
Lead (Pb)	✓			?	✓		1.3
Mercury (Hg)	✓			?	✓		0.002
Molybdenum (Mo) *		✓				✓	--
Nickel (Ni)	✓			?	✓		4.9
Selenium (Se) *	✓			?	✓		0.1
Silver (Ag)	✓			?	✓		2.0
Zinc (Zn)	✓			?	✓		4.8

* - *If necessary for the sludge disposal option chosen.*
\+ - *Narrative Ord. Language references the "TBLL Document"*

YES NO

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

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

YES NO

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?

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

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? ____
City chose the most stringent between the two and applied them to both POTWs

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	2/yr	1/year	
Reporting:			
CIUs	monthly	2/year	The CIUs have more of a potential
Other SIUs	city does it	2/year	to impact the POTW
Self-Monitoring:			
CIUs	monthly to 2/yr	2/year	"
Other SIUs	city does it	2/year	

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected.

Does the Control Authority routinely split samples with industrial personnel: *Splits are conducted/provided upon request.*

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	AA flame & furnace	City/A.A./A.I (Tl, Be & Sb)
Cyanide	spectrophotometric	"
Organics	GC/MS	American Analytical
Other	T.Phenols 420.1	City

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 scrutinize the IU's field reports for details, use clean sampling protocol, and rely on DEQ's and EPA's blanks

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

5days	Conventionals
1 mos	Metals
1 mos	Organics

✓		Is there an established protocol clearly detailing sampling location and procedures?
	✓	Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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:_____

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)(viii)] **Not current with revised CFR 403 version*

✓ ___ 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	✓	Administrative Order
✓	Setting of compliance schedule	✓	Revocation of permit
✓	Injunctive relief	✓	Fines (maximum amount):

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

✓ Imprisonment
✓ Termination of Service
✓ Other: Performance bonds; Liability Insurance

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES	NO	
✓		When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
✓	✓*	Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)]. Comment: *City requires CIUs to self-monitor but, they do all the monitoring for the non-CIUs
✓	✓*	If no, does the Control Authority conduct all of the monitoring?

YES	NO	N/A	
✓			Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Action Date	Return to Compliance? Yes (Date)	No
Dassault	4/06	NOV	4/25/06	✓ 5/06	

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

#	%	
1	3	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.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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?	

YES	NO	
✓	___	Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]
0	___	How many SIUs are currently on compliance schedules?
___	✓	Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

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

	Number	Amount	
Civil	0	$	
Administrative fees	7	$4,400	
Total	7	$4,400	[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: Linko (proprietary)

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
✓		Inspection and Sampling schedule *(exact day is not specified)*
✓		Monitoring Data
✓		IU Compliance Status Tracking *(Excel spreadsheet)*
✓		Other: elements of their FOG program, invoicing, septage haulers

Can IU monitoring data can be retrieved by:

✓		Industry name
✓		Pollutant type
✓		Industrial category or type
✓		SIC Code
✓		IU discharge volume
✓		Geographic location
✓		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?
Information designated "confidential" by an IU is kept in a locked file drawer. If it's FOI'd, staff would turn the request over to their legal counsel.

___ ✓ Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: _____

✓ ___ Are all records maintained for at least 3 years?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

Six sampling & inspection personnel + 2 lab techs (no change from last audit)

YES NO

___ ✓ Have any problems in program implementation been observed which appear to be related to inadequate funding?

If yes, describe and show below the source(s) of funding for the program:

N/A

		Percent of Total Funding
✓	POTW general operating fund (G.O.F.)	100
___	IU permit fees	
___	monitoring charges	
✓*	industry surcharges *(*goes back to G.O.F.)*	
✓*	other (describe) "Fees"	
	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:

Yearly operation and maintenance increases will occur

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	Isco automatic samplers; pH meters
✓	___	Safety equipment	Respirators, safety belts, shoes, glasses, etc.
✓	___	Vehicles	2 stepvans, 3 trucks
✓	___	Analytical equipment	AA flame & furnace, spectrophotometer

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION *(not much has changed since the last Audit)*

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.):
IU's activities currently being implemented are requested as part of the permit application process. IU's P2 activities are also focused on during the inspections at the facilities. They now have P2 awards, P2 applications and a dedicated P2 person. This is their 10th year of this.

2. Has the source of any toxic pollutants been identified?
If yes, what was found?
Toxic pollutants are regularly identified through routine monitoring at most of the city's facilities.

3. Has the POTW implemented any kind of public education program? If yes, describe:
They have tours for school kids often. And, they still have "Captain Sewer" who appears at different conferences and schools to put on quite an entertaining education on sewer systems and opportunities to save water - nationally known. They have a "Can the Grease" program for problem areas along with "Cowboy Slick". They are still active in the City's "Zoo Days" w/environmental awareness information.

4. Does the POTW have any pollution prevention success stories for industrial users documented? Yes. If yes, please attach. *The city has not been compiling them. Their IU's applying for the P2 awards submit data.*

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
No

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants?
If yes, which of the "Guides to Pollution Prevention" were used? All SIUs have been given their applicable P2 guidance manuals now.

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 AG Industry Name Ark. Painting & Spec. File/ID No. C-54
Industry Address 815 Thomas Street
Industry Description Job shop painting and powder coatings
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3429
Ave. Total Flow (gpd) 37,000 Ave. Process Flow (gpd) 20,060
Industry visited during audit: YES

Comments: Fe Phosphatizing and painting of various customers' metal parts

FILE #: 2 AG Industry Name Progress Rail Serv. File/ID No. C-69
Industry Address 4301 Pratt Remmel Rd.
Industry Description Re-manufacturing rail car bearings
Industrial Category Metal finishing 40 CFR 433 SIC Code: 3562,3471,4789
Ave. Total Flow (gpd) 2,200 Ave. Process Flow (gpd) 0
Industry visited during audit: YES

Comments: Chrome plating but no process w.w. discharge

FILE #: 3 AG Industry Name Wheatland Tube Co. File/ID No. C-61
Industry Address 8200 Frazier Pike
Industry Description Mfg. metal pipe for various customers
Industrial Category Iron & Steel 40 CFR 420 SIC Code: 3317
Ave. Total Flow (gpd) ?? Ave. Process Flow (gpd) 7,000

Industry visited during audit: YES

Comments: Ceased metal finishing core operation (Fe phos.) in '06 and will be completely shutting down all operations in '07.

FILE #: 4 RM Industry Name Dassault Falcon Jet File/ID No. C-25
Industry Address 3801 E. 10th Street
Industry Description Aircraft Completion & Service center
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3721
Ave. Total Flow (gpd) 37,000 Ave. Process Flow (gpd) Zero Discharge

Industry visited during audit: YES

Comments:

FILE #: 5 RM Industry Name Unilever Best Foods File/ID No. S-09
Industry Address 8201 Frazier Pike 572-5621
Industry Description Production of Peanut Butter (Skippy)
Industrial Category N/A 40 CFR N/A SIC Code: 2099
Ave. Total Flow (gpd) 44,000 Ave. Process Flow (gpd) 0

Industry visited during audit: YES

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 6 RM Industry Name Hillcrest Camshaft File/ID No. C-54
Industry Address 5502 West 65th Street
Industry Description Refurbishing & production of re-manufactured industrial camshafts
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3714
Ave. Total Flow (gpd) <1.500 Ave. Process Flow (gpd) 0
Industry visited during audit: YES

Comments: Zero process w.w. as of 6/06; has rec'd P2 awards

FILE #: 7 RT Industry Name Interstate Highway Sign File/ID No. C-37
Industry Address 7415 Lindsey Rd.
Industry Description Mfg. highway signs
Industrial Category Metal finishing 40 CFR 433 SIC Code: 3993, 7399
Ave. Total Flow (gpd) 3,000 Ave. Process Flow (gpd) 1,000
Industry visited during audit: YES

Comments:

FILE #: 8 RT Industry Name Certainteed Corp. File/ID No. C-13
Industry Address 2701 East Roosevelt
Industry Description Mfg. Roofing material
Industrial Category Paving & Roofing 40 CFR 443 SIC Code: 2952
Ave. Total Flow (gpd) 74,700 Ave. Process Flow (gpd) 48,000

Industry visited during audit: YES

Comments:

FILE #: 9 RT Industry Name Coca-Cola Bottling File/ID No. S-18
Industry Address 7000 Interstate I-30
Industry Description Soft drink processor
Industrial Category N/A 40 CFR N/A SIC Code: 2086
Ave. Total Flow (gpd) 151,000 Ave. Process Flow (gpd) ?

Industry visited during audit: YES

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

	AG FILE 1	AG FILE 2	AG FILE 3	RM FILE 4	RM FILE 5
1. Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	✓
2. Is the user subject to categorical pretreatment standards?	✓	✓	✓	✓	no
a. New source or existing source (NS or ES)?	NS	NS	NS	NS	n/a
b. Is this IU one identified as having P^2 potential?	1	1	1	1	1

B. Control Mechanism

1. Does the file contain an application for a control mechanism? *(See Attch. A-2 for example)*	✓	✓	✓	✓	✓
If yes, what is the application date?	8/05	3/07	7/06	11/06	10/06
Does it ask for Pollution Prevention information? (See #4 on Attch. A-2i)	✓	✓	✓	✓	✓
2. Does the file contain a Permit? *(See Attch. A-5 example)*	✓	✓	✓	✓	✓
Permit Expiration Date?	12/07	4/07	8/08	11/08	11/08
Is a fact sheet included? *(See Attch. A-3 for example)*	✓	✓	✓	✓	✓
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	✓
b. Expiration date?	✓	✓	✓	✓	✓
c. Statement of nontransferability?	✓	✓	✓	✓	✓
d. Appropriate discharge limitations?	✓	2	✓	✓	✓
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	✓

Comments: 1) City sends P2 awards application to all their IU s (See Attch. A-4 for example); 2) IU discharges no process wastewater, see Attach. A-6 for partial permit with "...authorized to discharge domestic only..."

SECTION III: INDUSTRIAL USER FILE REVIEW

	AG FILE 1	AG FILE 2	AG FILE 3	RM FILE 4	RM 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	N/A	N/A	N/A
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	N/A	N/A	N/A	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?	✓	✓	✓	✓	✓
e. Sample preservation procedures?	✓	✓	✓	*	✓
f. Chain-of-custody records? *(*See Attch. A-7 for partial C of C records)*	✓	✓	✓	✓	✓
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	✓

SECTION III: INDUSTRIAL USER FILE REVIEW

	AG FILE 1	AG FILE 2	AG FILE 3	RM FILE 4	RM FILE 5
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	✓	✓	N/A	✓	N/A
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	1	✓	✓	✓	✓
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	✓
Inspections *(See Attch. A-9 for example summary)*					
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)]	✓	✓	✓	"Linko"	✓
b. Date of last Inspection	12/06	4/06	8/07	4/06	11/06
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	✓	N/A	N/A
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	✓	✓	✓	✓	✓
f. Evaluation of pretreatment facilities?	N/A	N/A	✓	✓	✓
g. Evaluation of self-monitoring equipment and techniques?	N/A	✓	✓	✓	✓

Comments: 1) See Attch. A-8 for example

SECTION III: INDUSTRIAL USER FILE REVIEW

	AG FILE 1	AG FILE 2	AG FILE 3	RM FILE 4	RM FILE 5
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	*(See Attch. A-10 for example eval. form & plans)*				
	✓	✓	✓	✓	✓
i. Manufacturing facilities?	✓	✓	✓	✓	✓
j. Chemical handling and storage procedures?	1	1	1	1	1
k. Chemical spill prevention areas?	✓	✓	✓	✓	✓
l. Hazardous waste storage areas and handling procedures?	1	1	1	1	1
m. Sampling procedures?	✓	✓	✓	✓	✓
n. Laboratory procedures?	Contract Labs--> "			"	"
o. Monitoring records?	✓	✓	✓	✓	✓
p. Evaluation of Pollution Prevention opportunities?	✓	✓	✓	✓	✓
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?	✓	✓	✓	✓	N/A
b. 90-Day Report?	✓	✓	✓	✓	N/A
c. All periodic reports?	✓	✓	✓	✓	✓
d. Compliance schedule reports?	N/A	N/A	N/A	N/A	N/A
12. Did the IU report on all required parameters?	✓	✓	✓	✓	✓
13. Did the IU comply with the required sampling frequency(s)?	✓	✓	✓	✓	✓
14. Did the IU report flow?	✓	✓	✓	✓	✓

Comments: 1) Could be more comprehensive

SECTION III: INDUSTRIAL USER FILE REVIEW

	AG FILE 1	AG FILE 2	AG FILE 3	RM FILE 4	RM FILE 5
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)]	No 1	N/A	✓	✓	✓
18. Has the IU developed a Slug Control and Prevention Plan?	✓	✓	✓	✓	✓
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	✓
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	N/A	N/A	N/A	N/A	no
b. Did POTW respond to the spill?	N/A	N/A	N/A	N/A	✓

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	N/A	N/A	N/A	✓	✓
b. IU self-monitoring results?	N/A	N/A	N/A	✓	✓
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?	0	0	0	4	2

Comments: 1) See Attch. A-11 for NOV to IU for NOT reporting process change; 2) IU had a 330 gallon glycol spill. IU reported this according to their SPCC with no harm to POTW

SECTION III: INDUSTRIAL USER FILE REVIEW

	AG FILE 1	AG FILE 2	AG FILE 3	RM FILE 4	RM FILE 5
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	N/A	N/A	N/A	No	✓
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	N/A	N/A	N/A	✓	✓
5. Were all nondischarge violations identified in the file?	✓	N/A	N/A	✓	✓
6. Was the IU notified of all violations?	✓	N/A	N/A	✓	✓
7. Was follow-up enforcement action taken by the Control Authority?	Not Necessary-->		N.N	N.N.	N.N.
8. Did the Control Authority follow its approved ERP?	✓	✓	✓	✓	✓
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	✓	-	-	✓	✓
10. Is there a compliance schedule? If yes:	no	no	no	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)]	✓	✓	✓	✓	✓
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?	no	no	no	no	no
Date of publication.	N/A	N/A	N/A	3/06	N/A

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

	RM FILE 6	RT FILE 7	RT FILE 8	RT FILE 9	FILE
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	2 NS	1 NS	NS	
b. Is this IU one identified as having P^2 potential?	-	✓	✓	✓	

B. Control Mechanism

1. Does the file contain an application for a control mechanism? *See Attch. A-2 for example*	✓	✓	✓	✓	
If yes, what is the application date?	7/06	12/05	3/06	1/07	
Does it ask for Pollution Prevention information?	✓	✓	✓	✓	
2. Does the file contain a Permit? *See Attch. A-5* example	✓	✓	✓	✓	
Permit Expiration Date?	8/08	1/08	4/08	1/09	
Is a fact sheet included?	✓	✓	✓	✓	
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	✓	✓	✓	✓	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	✓	3	3	✓	
e. Appropriate self-monitoring requirements?	?	✓	✓	✓	

Comments: 1) Reg. process installed in '86; 2) Installed in '97; 3) Local limits are less stringent then CFR 433's

SECTION III: INDUSTRIAL USER FILE REVIEW

	AG FILE 1	AG FILE 2	AG FILE 3	RM FILE 4	RM FILE 5
f. Sampling frequency?	✓	✓	✓	✓	✓
g. Sampling locations?	✓	✓	✓	✓	✓
h. Requirement for flow monitoring?	✓	✓	✓	✓	✓
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	N/A	✓
j. Applicable IU reporting requirements?	✓	✓	✓	✓	✓
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	✓
Records retention?	✓	✓	✓	✓	✓
Civil and Criminal Penalty provisions?	✓	✓	✓	✓	✓
Revocation of permit?	✓	✓	✓	✓	✓
l. Compliance schedules/ progress reports	N/A	N/A	N/A	N/A	N/A
m. General/Specific Prohibitions?	✓	✓	✓	✓	✓
n. Where technologically and economically achievable, are P^2 aspect included?	no	no	no	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)]	1	1	1	1	1
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A	N/A	✓	N/A	N/A

Comments: 1) See Attch. A-12 for "partial" notification. A separate "Pretreatment Regulation" revision notification should be circulated.

SECTION III: INDUSTRIAL USER FILE REVIEW

	RM FILE 6	RT FILE 7	RT FILE 8	RT FILE 9	FILE
f. Sampling frequency?	✓	✓	✓	✓	
g. Sampling locations?	✓	✓	✓	✓	
h. Requirement for flow monitoring?	✓	✓	✓	✓	
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	N/A	
j. Applicable IU reporting requirements?	✓	✓	✓	✓	
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	
Records retention?	✓	✓	✓	✓	
Civil and Criminal Penalty provisions?	✓	✓	✓	✓	
Revocation of permit?	✓	✓	✓	✓	
l. Compliance schedules/ progress reports	N/A	N/A	N/A	N/A	
m. General/Specific Prohibitions?	✓	✓	✓	✓	
n. Where technologically and economically achievable, are P^2 aspect included?	no	✓	✓	✓	

C. Application of Standards

1. Has the IU been properly categorized?	✓	✓	✓	✓	
2. Were both Categorical Standards and Local Limits properly applied?	✓	See 1 above	N/A	N/A	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	2	2	2	2	
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A	N/A	N/A	N/A	

Comments: 2) See Attch. A-12 for "partial" notification. A separate "Pretreatment Regulation revision" notification should be circulated.

SECTION III: INDUSTRIAL USER FILE REVIEW

	RM FILE 6	RT FILE 7	RT FILE 8	RT FILE 9	FILE
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	N/A	N/A	
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	N/A	N/A	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?	1	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	1	✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	1	✓	✓	✓	
b. Sample date and time?	-	✓	✓	✓	
c. Sample type?	-	✓	✓	✓	
d. Wastewater flow at the time of sampling?	-	✓	✓	✓	
e. Sample preservation procedures?	-	✓	✓	✓	
f. Chain-of-custody records?	-	✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	-	✓	✓	✓	

Comments: 1) IU has no discharge except S.S.

SECTION III: INDUSTRIAL USER FILE REVIEW

	RM FILE 6	RT FILE 7	RT FILE 8	RT FILE 9	FILE
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	-	1	✓	✓	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	-	Time	Time	Flow	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	-	✓	✓	✓	
Inspections *(See Attch. A-9 for example summary)*					
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	9/07	1/06	4/06	1/07	
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	N/A	N/A	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	✓	✓	✓	✓	
f. Evaluation of pretreatment facilities?	✓	✓	✓	✓	
g. Evaluation of self-monitoring equipment and techniques?	N/A	✓	✓	N/A	

Comments: 1) No TOMP but testing only for "pollutants known to be present". City performs a complete TTO scan 1/yr.

SECTION III: INDUSTRIAL USER FILE REVIEW

	RM FILE 6	RT FILE 7	RT FILE 8	RT FILE 9	FILE
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)] *(See Attch. A-10 for example eval. form & plans)*	✓	✓	✓	✓	
i. Manufacturing facilities?	✓	✓	✓	✓	
j. Chemical handling and storage procedures?	1	1	1	1	
k. Chemical spill prevention areas?	✓	✓	✓	✓	
l. Hazardous waste storage areas and handling procedures?	1	1	1	1	
m. Sampling procedures?	N/A	✓	✓	✓	
n. Laboratory procedures?	N/A	✓	✓	✓	
o. Monitoring records?	N/A	✓	✓	N/A	
p. Evaluation of Pollution Prevention opportunities?	✓	✓	✓	✓	
q. Control Authority inspector signature?	✓	✓	✓	✓	
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	N/A	✓	✓	N/A	
11. Does the file include: a. BMR?	✓	✓	✓	N/A	
b. 90-Day Report?	✓	✓	✓	N/A	
c. All periodic reports?	N/A	✓	✓	N/A	
d. Compliance schedule reports?	N/A	N/A	N/A	N/A	
12. Did the IU report on all required parameters?	N/A	✓	✓	N/A	
13. Did the IU comply with the required sampling frequency(s)?	N/A	✓	✓	N/A	
14. Did the IU report flow?	N/A	✓	✓	N/A	

Comments: 1) Could be more comprehensive

SECTION III: INDUSTRIAL USER FILE REVIEW

	RM FILE 6	RT FILE 7	RT FILE 8	RT FILE 9	FILE
15. Did the IU comply with the required reporting frequency(s)?	N/A	✓	✓	N/A	
16. For all SIUs, are self-monitoring reports signed and certified?	N/A	✓	✓	N/A	
17. Did the IU report all changes in its discharge? [403.12(j)]	N/A	1	1	N/A	
18. Has the IU developed a Slug Control and Prevention Plan?	✓	12/06	12/06	11/06	
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	-	N/A	N/A	N/A	
b. Did POTW respond to the spill?	N/A	N/A	N/A	N/A	

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	N/A	2	2	2	
b. IU self-monitoring results?	N/A	✓	✓	N/A	
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?	0	0	2	0	

Comments: 1) Not indicated in self-monitoring report; 2) City has data entered into the "Linko" proprietary system which tracks violations

SECTION III: INDUSTRIAL USER FILE REVIEW

	RM FILE 6	RT FILE 7	RT FILE 8	RT FILE 9	FILE
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	N/A	N/A	1	N/A	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	N/A	N/A	✓	N/A	
5. Were all nondischarge violations identified in the file?	N/A	?	?	?	
6. Was the IU notified of all violations?	N/A	N/A	✓	N/A	
7. Was follow-up enforcement action taken by the Control Authority?	Not Necessary		✓	N.N.	
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	✓	N/A	
10. Is there a compliance schedule?	no	no	no	no	
If yes:					
11. Were there any compliance schedule violations?	--	--	--	--	
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	2	2	2	
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?	No	N/A	N/A	N/A	
Date of publication.	N/A	N/A	N/A	N/A	

Comments: 1) No records of communication to confirm but others were found (See Attch. A-13 for example); 2) City uses an Excel spreadsheet to determine SNC

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Little Rock NPDES #: AR0021806

Date of Audit: 9/11 - 13/07 Date entered into QNCR: 10/25/07
(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
Interstate Highway Sign Co., 7415 Lindsey Rd., 501.490.4242

Type of industry: Mfg Hwy Signs Date/Time of visit:
Metal Finisher CFR 433 9/12/07 / 1:15 p.m.

Industry contacts: Elizabeth A. Butler - Quality/Safety Mgr.

	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? (1)	✓		
8. Suitable sampling location?	3		
9. Appropriate self-monitoring procedures/equipment?	✓		
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	2		

Additional comments:

Facility manufactures highway signs of various sizes for many states across the nation. Processes have not changed significantly since last audit.

1) No TOMP; 2) No paint, went to vinyl coating & water conservation; 3) Sampling when Cr tank is released. IU gives City 48 hr. notice. City samples stream entering sewer system.

Visit conducted by: Torrence/Davis/Roll/Foster

Date: 9/12/07

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
CertainTeed 2701 East Roosevelt Rd., 501.375.9173
Type of industry: Roofing Material CFR 443
Date/Time of visit: 9/12/07 / 7:55 a.m.

Industry contacts: Jeff Kohlstedt - Quality/Env. Manager

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	1		
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	2		

Additional comments:

1) Grit screw separator to remove granules. No floor drains in facility. 2) Cardboard recycling.

Using cooling H2O to remove heat from rolls; cooling H2O is treated to remove grit & discharged to the City. Facility can meet O&G CFR 443 limits without pretreatment.

Visit conducted by: Torrence/Murders/Gatlin/Roll

Date: 9/12/07

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
Dassault Falcon Jet 10th & Leonard, 501.210.0147
Type of industry: Corporate Jet "outfitter"/painting/detailing
CFR 433 Date/Time of visit:
9/12/07 / 9:15 a.m.
Industry contacts: Pete Christiansen-Mngr, Env. Affairs &
Eugene Jamison-Sr. Env. Engineer

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

Additional comments:

1) Going to Cr free paints & primers; 2) Electroplating bldg. has spill containment; 3) Zero discharge

Visit conducted by: Torrence/Davis/Foster/Molina
Date: 9/12/07

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
Hillcrest Camshaft Service 5502 W. 65th St. 501.565.6700
Type of industry: Rebuild Ind. Camshafts Date/Time of visit:
Metal Finishing CFR 433 9/12/07 / p.m.

Industry contacts: Tim Nesterenko-V.P. & Steve Detmer-Customer Service Mngr.

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

Additional comments:

1) Safety Kleen pumps sumps every 3 months to remove solids fro parts washers; 2) Oil skimmer on parts washer cabinet; 3) Cr operations below grade in sump for inherent spill control
No floor drains

Visit conducted by: Torrence/Davis/Molina/Murders

Date: 9/12/07

Ruth Torrence
(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
CocaCola Bottling 7000 Interstate 30 501.569.2800
Type of industry: Soft drink producer Date/Time of visit:
9/12/07 / 8:45 a.m.
Industry contacts: Craig Blackburn-Plant Mngr. & Dana Cuccia-Quality Assurance Mngr.

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	2		
4. Pretreatment equipment maintained and operational?			2
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	1		

Additional comments:
1) Waterless urinal; water minimization; paper recycling. Plans to go to 100% recycle of H2O and achieve zero discharge;
2) O&G separator in shop only; Neutralization of can crusher water only. Cleaning H2O flows directly to the City

Diversion meter measures water to sewer, difference between main central water & diversion meter goes into product.

Visit conducted by: Torrence/Gatlin/Roll/Murders

Date: 9/12/07

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
Wheatland Tube Co. 8200 Frazier Pike 501.490.1900
Type of industry: Mfg. Tubing Date/Time of visit:
*CFR 420 9/12/07 / 8:05 a.m.
Industry contacts: Cornelius Jones-Quality Engineer &
Greg Barris

	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: Facility makes galvanized and regular steel tubing in various shapes and sizes.
*IU recently ceased the phosphatizing operations which now leaves them entirely under the Iron & Steel category of CFR 420. Production numbers and flow were discussed during this site visit.
Raw material includes cold rolled steel and zinc. Entire plant is shutting down all ops by ~9/30. Galvanizing ops were scheduled to be shut down the day of this site visit. This was the op. that produced most of the wastewater.
Chems on site have been reduced via process to a bare minimum to reduce the un-used or spent wastes to dispose of. Nothing in "overstock". Anything virgin (acetones [which they distill for re-use now], eg.) will go back to vendor or to their sister plants for their use.
Any other wastewater currently being generated is still being treated in the original way.

Visit conducted by: Gilliam/Molina/Davis/Foster
Date: 9/12/07

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: Little Rock NPDES #: AR0021806
Industry name: Wheatland Tube Co.
Additional comments:
ASI and Siemens will come and pump coolants, oils, water pits and other hydraulic fluids they had always normally pumped.
Both pipe "mills" will be down by the end of September.
Threading, cutting, "grooving" will all be ceased by the end of September.
All equipment will be removed by then. The last step will be the floor sweep from which the small amount of wastewater from it will also be taken off-site for disposal.
City reps indicated to the IU rep weekly site visits will be conducted to continue watching closure operations, handling wastestreams etc. City reps were very careful to mention to the IU rep they would be keeping a vigil on the IU and asked about any variations in w.w. characteristics the IU might expect. Any changes the IU might anticipate needs to be reported to the City.
IU rep indicated any w.w. volumes being discharged will be declining rapidly as they begin the total plant close-down.
IU was still operating as normal during the visit. Tubes were being formed from cold rolled steel strips via passing them through a series of "stands" which "rolled" the strips into their tube form after which they are welded together. Tubes are cut to customer desired lengths.
Pickling (HCl acid) and rinse operations still active. Liquid painting ops for interior of pipe also still in operation but is also scheduled to be shut down very soon.
Cutting, threading and grooving operations' coolants are sent thru filters for max. usage with oily waste sent to large containment storage tank outside.
Chemical storage areas looked well maintained and contained with ~30 empty drums in one area. Handling procedures included forklifting pallets & totes, drum dollies & hand carried 5 gallon containers. There are no floor drains in the building. Pretreatment operations include typical chemical precip, flocculation, polymers, clarification, neutralization including a filter press.
Outside waste oil tank includes filtered re-circulated coolants. Overall site visit did not indicate any problems with the plant's shutdown procedures with the City personnel very aware of stages of IU's chemical disposal practices until they're completely shut down.
Adequate sampling site and flow metering device.
The building's outside storage areas also looked clean.
Visit conducted by: Gilliam/Molina/Davis/Foster

Date: 9/12/07

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
Arkansas Painting and Specialties 501.376.4617
Type of industry: Date/Time of visit:
9/12/07 / 10:07 a.m.

Industry contacts: Tony Bench

	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:
Facility "job shop" paints and coats various shaped metal pieces for a variety of customers.

The operation that captures them under the metal finishing regs is the Fe phosphatizing operation. The typical 5 stage phosphatizing "tunnel washer" had counter current rinses as much as the IU rep indicated was feasible.

Their old building was visited first to verify there was nothing being, or could be discharged except sanitary and some "kitchen" waste. City personnel were very cognizant about an open 2" pipe and a garden hose. IU rep was asked to cap off or remove old pipe. The rest of the building contained their main office and some dry storage made up of scrap wood and cardboard. The "tunnel washer" was moved to a newer building. One floor drain visible with no chemical storage in the old building. A visual check was made in manhole outside and there was no flow.

Visit conducted by: Gilliam/Gatlin/Roll/Murders

Date: 9/12/07

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: Little Rock NPDES #: AR0021806
Industry name: Arkansas Painting and Specialties

Additional comments:
"New" building containing the 5 stage phosphatizing operation and basic painting was visited next.
Painting operations for customer products being processed this day was mainly for Cameron valves. No process w.w., just hand spray painting.
Phosphatizing system utilizes a serpentine conveyor system with varying shapes of hooks move the raw (customer) parts through the complete system. IU rep indicated that 98% of products are cold rolled steel in various forms with very little galvanized.
The first stage is a heated alkaline wash (pH ~12 s.u.) followed by a countercurrent fresh H2O rinse. The third stage is the Fe phosphate wash followed by two final H2O rinses with the fourth tank countercurrent flowed back to the phos tank with the fifth fresh H2O rinse going directly to the City.
Products are then conveyed into the dry off oven (250° to 300° F), then sent thru the powder coat rooms (hand sprayed) and then to the bake oven (375° to 400°F). Brackets currently being finished were for IC Corp. in Conway.
Another outside (50'X70'[?]) storage building contained a variety of old & new paint cans, acrylics, thinners, aerosols and lacquers. Well ventilated but, in this auditor's opinion, a potential fire hazard. Floor did not seem to be sloped. Inventory control advised and outside housekeeping could be improved.

Visit conducted by: Gilliam/Gatlin/Roll/Murders

Date: 9/12/07

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
Unilever 8201 Frazier Pike Rd. 501.490.3312
Type of industry: Skippy peanut butter Date/Time of visit:
9/12/07 / 1:20 p.m.
Industry contacts: Alicia Prioleau-Quality/Env. Specialist;
Tawana Walker Ogeto/Tech. Mngr & Patrick Mathieu/Plant Mngr.

	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:

Site visit began with City rep explaining purpose of visit and wanting to look at the area(s) where wastewater is generated.

We were first "invited" to their "GMP" (cleanliness) slide show. IU reps were visually proud of their facility. Unilever is the only facility in the world to make "Skippy" peanut butter but, is also sold under various other names worldwide. Recipe and brand was first introduced in 1933.

Bulk peanuts are brought in by rail car via a covered and clean outside transfer station. 4 to 5 rail cars/day are unloaded/day.

Visit conducted by: Gilliam/Molina/Gatlin/Murders

Date: 9/12/07

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: Little Rock NPDES #: AR0021806
Industry name: Unilever

Additional comments:
Production area required extra suiting-up procedures to meet their "clean" room requirements so the City rep indicated we just wanted to look at the roaster and cleaning operations. No water is used in this area. This area is where the finished product is made, blending the butter with sugar, salt and other proprietary flavors.

Raw shelled peanuts are conveyed (vacuumed) to numerous inside silos (200,000 lbs/silo) for "on time" production. Inventory is usually less than 2 days. July and August might be considered their "peak" season because of back-to-school promotions.

Between 2 and 4 million lbs/week of peanut butter is produced.

Good chemical storage on portable self-containing totes and good spill containment.

Parts to be cleaned are taken out of production and sent to a small "kitchen" to be hand washed.

Roaster room has no floor drains and is very clean. Peanuts were being tumbled in a huge oven-type system. 2 times/shift, the roaster wet-air scrubbers are discharged at ~80 gallons.

Water conservation was aided by the IU's change in practice of changing over from soapy H2O to foam cleaning of their huge screens and oven parts.

Good rapport between City and IU reps.

Facility was nominated for a P2 award this year.

Visit conducted by: Gilliam/Molina/Gatlin/Murders

Date: 9/12/07

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Little Rock NPDES #: AR0021806

Name, address and phone number of industry:
Progress Rail Services 4301 Pratt Remmel Rd 501.490.4230
Type of industry: Rebuild RR car bearings Date/Time of visit:
CFR 433 9/12/07 / 2:42 p.m.
Industry contacts: Steve Louks-Plant Mngr.; Dave Fremmel-EHS "man" & Bill Counts-Plating Supv.

	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	✓		

*Zero regulated process w.w. discharge

Additional comments:

This chrome plating facility has a close-looped systems for its regulated wastestreams. Volumes of plating solutions/rinses and P2 practices in use here have helped them achieve the status of "zero discharge" (except sanitary). "Raw material" consists of old/worn steel wheel assemblies from the railroad industry. When the wheels get worn beyond industry specs, the bearings must also be checked. Some bearings are still withing spec (American RR Assoc.) but some have to be "re-built/resurfaced" with the chrome plate. Pre-wash (alkaline) fluids are recycled daily after into a holding tank. An outside company comes in twice daily to process any grease out of the fluids. Use of polymers and a cellulose to extract the O&G which is sent off as non-haz. The fluids then are re-used with additional water and chems to keep it at the correct pH to continue re-using.

Visit conducted by: Gilliam/Foster/Gatlin/Murders

Date: 9/12/07

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: Little Rock NPDES #: AR0021806
Industry name: Progress Rail Services

Additional comments:
Only the bearings are plated in the process. These bearings are similar to the standard "Timken" bearings in your average car. About 22 rollers are within each bearing.
The only plated surface is the interior diameter face/cone.
Each shift checks the bearing for defects to determine if plating is necessary to bring them back into "spec".
Very small amount of plating depth is required. Some of the bearings are so worn down, they cannot be plated but have to be thrown away. IU reps indicated about 1 to 2 ten-thousandths of an inch make up the plated surface depending on measurements. Plating supervisor re-checks inside diameter again to determine the exact required depth of Cr plate necessary. His measuring device has five different "categories" to separate the bearings for proper plating time, therefore, depth. For instance, category 1 stays in the bath 35 minutes, category 2 - 45 minutes, etc. up to about an hour.
Bearings are stacked vertically into racks with the anode in the center. In this way, only the inside of the bearings are the surface plated. Rinse tanks which follow, are all counter current flow. After rinsing the racks are sent through an anti-rust spray (non-chrome based).
Scrubbers use air/water/air pads for capture of Cr. Water collected from these scrubbers are re-used in Cr baths. Not much Cr heavy water is collected via this process.
Make-up water is automatically pumped every couple minutes.
They have a automatic purification system (APS) for its Cr bath also. A series of vats uses positive and negative membranes that "pulls" the unwanted metals (Fe & Cu for example) out of solution for re-use using Titanium "dummies".
Continual cleaning of the baths keep the unwanted metals out of the make-up water. They haven't had to dump any of their tanks because of their P2 activities. Use of an amp-meter (6 to 7) tells the operator when it's time to run the baths thru the APS for recycle. Samples are also periodically sent off to determine how much Cr and sulfuric to add.
Even the floor cleaning equipment for the office area is kept in a locked room so that w.w. can't inadvertently be dumped into the plating streams.
No floor drains in the bldg.
Both City and IU reps very familiar with regs, permit provisions and P2 activities.
Visit conducted by: Gilliam/Foster/Gatlin/Murders

Date: 9/12/07

(signature of auditor conducting visit)

Attachment A-1

Environmental Assessment Division

Adams Field Treatment Plant
1001 Temple Street
Little Rock, Arkansas 72203
Fax.: 501/688-1540

1/6/07 survey screen form

Wastewater Screening Form

City of Little Rock Pretreatment Ordinance #17,966 requires that all industrial/commercial dischargers to the Little Rock Wastewater sanitary sewer meet specific requirements regarding quality and quantity of their discharged wastewater. These requirements are mandated by the U.S. Environmental Protection Agency under the Federal Clean Water Act. In order to assess compliance with the applicable city, state and federal requirements, Little Rock Wastewater is collecting information from all "non-domestic" dischargers on the system. This Wastewater Screening Form is the first step in this process. **Please complete both sides of this form and return it to the above address within 30 days of receipt.** If you have any questions, please call Little Rock Wastewater Environmental Assessment Division at 688-1529.

Part I – Industry Information

Business Name: _____

Business Location: _____

Business Mailing Address: _____

Contact Person Name: _____

Title: _____

Telephone Number: _____

Business Hours _____ Business Days: ☐ Mon. ☐Tues. ☐Wed. ☐Thurs. ☐Fri.☐ Sat. ☐Sun.

Number of Employees: _____

Water Works Account Number(s):
(Include all Active Account Number(s) _____

Part II – Wastewater Characteristics

Type of Business: _____

Process(s) Performed: _____

Products Manufactured: _____

SIC Code: _____ NAICS Code: _____

Please check all sources of wastewater discharged from you facility to the sanitary sewer.

Type of Wastewater		Estimate Percent of Total Discharge	Type of Wastewater		Estimate Percent of Total Discharge
Bathrooms/Domestic			Laundry		
Kitchen/Restaurant			Metal Working		
Floor Cleaning			Plating Baths		
Tank Wastes			Equipment Cleaning		
HVAC/Boiler Discharges			Pretreatment System		
Vehicle Maintenance Wash			Machine Coolants		
Waste Product Disposal			Other Non-domestic Sources		

~ 6/07

recd 9/11/07 (Linko Quarry)

Company Name	Contact Person	Title	Address	City	State	Zip	Phone#	CTS	FOG	LIC	MFG	HAZ	H_2O	AT&T
A Plus Graphics	Jason Bridges	Owner	6801 W. 12th Street AA	Little Rock	Arkansas	72204	501-661-0101	X		X				
A-1 Finishing	Carlton Johnson	Owner	7611 Dogwood Trail	Little Rock	Arkansas	72103	501-551-1360	X		X				
Acord Packaging Inc.	Greg Acord	President	9121 Sibley Hole Road	Little Rock	Arkansas	72209	501-455-0000	X			X			
Aerial Imaging	Richard Lawrence	Owner	11711 Fairway Drive	Little Rock	Arkansas	72212	501-217-9933	X		X				
Alcacio Graphics	Alberto Alcacio	Owner	7319 Baseline Road	Little Rock	Arkansas	72209		X		X				
Alda's Forever	Alda Ellis	Chairman	4200 Hoerner Street	Little Rock	Arkansas	72209	501-565-2900	X			X			
American Plastic Inc	Bart Richardson	President	15001 Mail Route Road	Little Rock	Arkansas	72206	501-888-7450	X			X			
Animal ID			900 S Shackleford Rd, ste 300	Little Rock	Arkansas	72211	501-907-5253	X						X
Arkansas Fiberglaz Corporation	Michael Herndon	President	8915 1/2 Herndon Road	Little Rock	Arkansas	72204	501-562-4386	X			X			
Arkansas Flag and Banner	Kerry McCoy	President	800 W 9th Street	Little Rock	Arkansas	72201	501-376-8436	X			X			
Arkansas Paint Source, Inc.	Travis Detter	Owner	13315 Chenal Parkway	Little Rock	Arkansas	72211	501-227-7770	X		X				
Arkansas Sheet Metal Company Inc	Jimmy Jennings	President	2706 W 11th Street	Little Rock	Arkansas	72204	501-663-0123	X			X			
Arkansas Sign & Neon Company	Nevil Withrow	President	8525 Distribution Drive	Little Rock	Arkansas	72209	501-562-3942	X			X	X		
Ashland Chemical			208 N Beech Street	Alexander	Arkansas	72202	501-457-0075	X						X
August House Publishers Inc	Ted Parkhurst	President	201 E Markham Street Plaza Level	Little Rock	Arkansas	72201	501-372-5450	X			X			
B&B Concrete of Little Rock Inc	Mark Breckenridge		1200 Westpark Suite 200	Little Rock	Arkansas	72215	501-664-9400	X			X			
B&C Bindery Services Inc	Bill Buddenberg	President	3506 Mabelvale Pike	Little Rock	Arkansas	72204	501-565-9345	X			X			
Berendsen Fluid Power Inc.			7600 Fluid DR	Little Rock	AR	72206		X				X		
Boyd Metal of Little Rock, Inc	Thomas Kennon	Owner	600 Bond Avenue	Little Rock	Arkansas	72202	501-301-8500	X		X				
Burnside Tool Design Inc	Richard Burnside	President	7111 Russwood Lane	Mabelvale	Arkansas	72103	501-888-1459	X			X			
C & S Pressure Cleaning Service	Charles Shelton	Owner	2601 Elkhart Drive	Little Rock	Arkansas	72204	501-442-4560	X		X				
Caldwell Professional Painting	Lovell Caldwell	Owner	6113 Judy Lane	Little Rock	Arkansas	72209	501-960-3171	X		X				
Central Arkansas Painting & Drywall LLC	Loredo Eligio	Owner	9500 South Heights Roads	Little Rock	Arkansas	72209	501-612-2237	X		X				
Century Industries Inc	Adrian Treadway	CEO	2300 E 145th Street	Little Rock	Arkansas	72206	501-897-5253	X			X			
Champshots Sports Photography	Cary Nettles	Owner	6602 Granada Drive	Little Rock	Arkansas	72205	501-663-6515	X		X				
Citywide Pressure Washing	Tellys Clemmons	Owner	17011 E Mail Route Road	Little Rock	Arkansas	72206	501-838-6571	X		X				
Clean & Shine, Inc.	Martha Castro	Owner	9417 Wilderness Road	Little Rock	Arkansas	72209	501-568-6243	X		X				
Coleman Production Studios	Coleman Myreon	Owner	701 Green Mountain Drive #807	Little Rock	Arkansas	72211	501-312-5877	X		X				
Daniel Metals Inc.	Joey Dailey	Owner	518 W Captiol Avenue	Little Rock	Arkansas	72201	501-801-0220	X		X				
Datafix Inc	Rick Newton	President	5101 W 65th Street	Little Rock	Arkansas	72209	501-562-3554	X			X			
Davis Rubber Company	Roger Davis	President	1600 E 15th Street	Little Rock	Arkansas	72202	501-374-1473	X			X			
Davis Trailer & Truck Equipment Inc	Chester Mercer	President	7609 Colonel Glenn Road	Little Rock	Arkansas	72204	501-562-6295	X			X	X		
DFI Architect Signs	Jack Oliver Sr.		2000 Cantrell Rd.	Little Rock	AR	72202	375-5277	X				X		
D'I Van Photo & Video	Laura Martinez	Owner	5319 W 65th Street	Little Rock	Arkansas	72209	501-570-8515	X		X				
Diamond Pressure Wash	Chris Wright	Owner	1501 W Colonel Glenn Road	Little Rock	Arkansas	72210	501-821-8796	X		X				
Discount Imaging	Darin Shea	Owner	11521 Kanis Road	Little Rock	Arkansas	72211	501-219-8258	X		X				
EK Painting Company	Erik Ek	Owner	407 Oak Lane	Little Rock	Arkansas	72205	501-658-1390	X		X				
Endless Power Corporation	David Thomasson	Owner	2 Amherst Cove	Little Rock	Arkansas	72205	501-663-3402	X		X				
Entergy Arkansas Port Facility			5001 Thibault RD	Little Rock	AR	72206		X				X		
Ergon Asphalt & Emulsions, Inc.			10201 W Markham Street #227	Little Rock	Arkansas	72205	501-219-4210	X		X				
Es Used Oil Collection Services LLC	Tenika Evansingston	Owner	16401 Chenal Valley Drive #7306	Little Rock	Arkansas	72223	501-821-1931	X		X				
Extreme Pressure Washing	Ricky Thigpen	Owner	12201 Mara Lynn Road #510	Little Rock	Arkansas	72211	501-744-4851	X		X				
Fiber Glass Systems NOV	Lee Orr	General Manager	2700 W 65th Street	Little Rock	Arkansas	72209	501-568-4010	X			X			
Floateyes Inc	Mike Gipson		4205 S Shackleford Suite C	Little Rock	Arkansas	72204	501-221-2673	X			X			
Fragrances From The Heart Candles	Toni Williams	Owner	4519 Foster Street	Little Rock	Arkansas	72204	501-565-7659	X		X				
Franklin Pump Systems Inc.			12401 I-30 HWY	Little Rock	AR	72209		X				X		
Garret Aviation Service			3223 10th St	Little Rock	AR	72202		X				X		
Geo Specialty Chemicals	Alex Avraamides	Vice President	9213 Arch Street Pike	Little Rock	Arkansas	72206	501-888-1211	X			X	X		
GESCO Company	Matthew Sego	President	2000 Thayer Street	Little Rock	Arkansas	72202	501-376-0361	X			X			
Glaze of Arkansas	Lemuel Henson	Owner	2817 Barber Street	Little Rock	Arkansas	72206	501-772-0784	X		X				
Gunn Funeral Home	Derrick Gunn	Owner	4323 W 29th Street	Little Rock	Arkansas	72204	501-660-4323	X		X				
H & L Painting LLC	Hector Hortelano	Owner	17846 Colonel Glenn Road	Little Rock	Arkansas	72210	501-521-5431	X		X				
Hackman Paint & Supply Co.			7600 S. University STE 3	Little Rock	AR	72209	562-1734	X				X		
HISCO			8200 Distribution DR	Little Rock	AR	72209		X				X		
Horton & Horton Printing Company	Roger Horton	President	12412 Sardis Road	Mabelvale	Arkansas	72103	501-455-3168	X			X			
House of Khrome	James Goforth	Owner	1712 S University Avenue	Little Rock	Arkansas	72204	501-614-9677	X		X				
Hydradyne Hydraulics	James Kinder	Manager	9514 Interstate 30	Little Rock	Arkansas	72209	501-568-4390	X			X			
Innercourt Photography and Video Production	Michael Stewart	Owner	5 Western Court	Little Rock	Arkansas	72209	501-539-0377	X		X				
J&M Foods Inc	Janis Thibault	Vice President	1021 Jessie Road	Little Rock	Arkansas	72202	501-663-1991	X			X			

A-1c

Company Name	Contact Person	Title	Address	City	State	Zip	Phone#	CTS	FOG	LIC	MFG	HAZ	H_2O	AT&T
Jetletter Printing & Mailing Co., LLC	William Hyatt	Owner	300 S Rodney Parham Road #10	Little Rock	Arkansas	72205	501-224-0042	X		X				
John Vancura Company	John Vancura	President	3020 Lewis Street	Little Rock	Arkansas	72204	501-666-5313	X			X			
Kennedy Dye Cutting			7619 Morris Drive	Little Rock	Arkansas	72209	501-568-5430	X						X
KST Watts & Co LLC	Harold Watts	Owner	25 Carroll Circle	Mabelvale	Arkansas	72103	501-960-9689	X		X				
Kwal-Howells Inc	William Tunno	Owner	9301 Treasure Hill Road	Little Rock	Arkansas	72227	501-224-4977	X		X				
Laboratory Corporation of America			1221 Westpark Dr.	Little Rock	AR	72204	583-5171	X				X		
Landmark Tile & Marble	Darrell Williams	Owner	49 Bryan Kay Circle	Little Rock	Arkansas	72206	501-888-1906	X			X			
Laser Tools Company Inc	Joe Wortsmith	President	3520 W 69th Street Suite 401	Little Rock	Arkansas	72209	501-562-0900	X			X			
LaserAim	Steve Spears	President	6600 Geyer Springs Road Unit 1	Little Rock	Arkansas	72203	501-375-2227	X			X			
LDL's Photo Shop	Linda Quinn	Owner	300 S University Avenue	Little Rock	Arkansas	72205	501-888-1851	X		X				
Little Rock Distribution	Dan Lasater	Owner	4300 W 65th Street	Little Rock	Arkansas	72209	501-562-8500	X		X				
Little Rock Sheet Metal Company Inc	Chris Cozart	President	625 Dixon Road	Little Rock	Arkansas	72206	501-490-1028	X			X			
Little Rock Tent & Awning Company	Paul Bone	President	6525 Murray Street	Little Rock	Arkansas	72209	501-562-8914	X			X			
Little Rock Tool Service	Gary Hogue	Sales Director	11600 Arch Street	Little Rock	Arkansas	72206	501-888-2457	X			X			
Mailsouth Inc.			100 Morgan keegan Drive #300	Little Rock	Arkansas	72202		X		X				
Mainline Adventures, Inc.	Michael Connet	Owner	13 Tall Pine Cove	Little Rock	Arkansas	72204	501-562-9432	X		X				
Mama's Marina Inc	Edwin Garner	Owner	1001B Rushing Circle	Little Rock	Arkansas	72205	501-663-7880	X			X			
Marina Cove, LLC			2228 Cottondale Lane	Little Rock	Arkansas	72202	501-224-0009	X		X				
Metal Recycling Corporation	Lee Ronnel	President	111 Center Street Suite 2150	Little Rock	Arkansas	72203	501-374-9017	X			X			
Meuwly Machine Works Inc	Jerry Meuwly	President	1901 E 15th Street	Little Rock	Arkansas	72202	501-372-3221	X			X			
Micro Grinding Systems	Bruce Winn	President	1823 E 17th Street	Little Rock	Arkansas	72202	501-374-8402	X			X			
Mix & Pack Inc	Richard Plezia	President	8501 Distribution Drive	Little Rock	Arkansas	72209	501-565-6363	X			X			
Next Generation LLC	Mike Phillips	President	1221 E 26th Street	Little Rock	Arkansas	72206	501-374-5358	X			X			
Orbit Fluid Power Company	Josh Lane	President	7428 Lindsey Road	Little Rock	Arkansas	72206	501-490-0408	X			X			
Ozark Fluid Power Inc	Arvis Tatom	President	10801 E Otter Creek Blvd	Mabelvale	Arkansas	72103	501-455-1052	X			X			
Power Technology inc	Thomas Burgess	President	16302 Alexander Road	Alexander	Arkansas	72002	501-407-0712	X			X			
Pro Services Inc.			2300 W. 60th St	Little Rock	AR	72209		X				X		
Professional Reproductions of Arkansas	John Frederick	Owner	310 Center Street	Little Rock	Arkansas	72201	501-376-3349	X			X			
Pup-N-Suds	Steven Kersey	Owner	7515 Geyer Springs Road #10.5	Little Rock	Arkansas	72209	501-838-0259	X		X				
Quik Print	John Frederick		310 Center St.	Little Rock	AR	72201	224-0159	X				X		
Reynolds Rubber Stamp Company	Melissa Boyd	President	800 W Markham Street	Little Rock	Arkansas	72201	501-372-4984	X			X			
Rose Publishing Company	Walter Nunn	President	2723 Foxcroft Road No. 208	Little Rock	Arkansas	72227	501-227-8104	X			X			
Semmaterials LP Little Rock			601 Shamburger LN.	Little Rock	AR	72206		X				X		
Shepherd's Inc	Mark yates	President	603 W Markham Street	Little Rock	Arkansas	72201	501-375-6937	X			X			
Simmons Mold & Die Inc	Carl Simmons	President	9811 Interstate 30	Little Rock	Arkansas	72209	501-565-8779	X			X			
Skytravel Avionics Inc	Ralph Murphy	President	2503 Frazier Pike	Little Rock	Arkansas	72206	501-372-0600	X			X			
Southwest Engravers	Dean Talley	President	11200 Garrison Road	Little Rock	Arkansas	72223	501-868-8310	X			X			
Tap Magic	Louis Jaramillo	Purchasing Manager	2330 Cantrell Road	Little Rock	Arkansas	72202	501-375-5644	X			X			
Taylor's Truck & Trailer	J.B. Taylor	Owner	1700 E 14th Street	Little Rock	Arkansas	72202	501-375-0251	X			X			
The Peerless Group			823 Main St.	Little Rock	AR	72209		X				X		
The STECO Corp			2330 Cantrel	Little Rock	AR	72203		X				X		
Thoughts to Ink	Fredie Smith	Owner	1608 S Jackson Street	Little Rock	Arkansas	72204	501-353-1274	X		X				
TJC Welding And Repair	Terry Reyna	Owner	15500 Lawson Road	Little Rock	Arkansas	72210	501-455-8338	X			X			
Walk-Winn Plastic Company	Jim Penn	President	1801 Scott Street	Little Rock	Arkansas	72206	501-376-0446	X			X			
Ward's Distribution LLC	Marshall Ward	Owner	70 Berkshire Drive	Little Rock	Arkansas	72206	210-240-8064	X		X				
Watkins Company	Scott Miles	Manager	11601 Otter Creek S.	Little Rock	Arkansas	72103	501-223-3445	X			X			
Wighita Press	Celia Taylor	Owner	12109 Stagecoach Road #222	Little Rock	Arkansas	72210	501-455-0905	X		X				
Wingfoot Commercial Tire Center	Randy Whittaker	Manager	7510 Fluid Drive	Little Rock	Arkansas	72206	501-490-1918	X			X			
Yukon Inc	David Jones	Owner	3723 Cantrell Road	Little Rock	Arkansas	72202	501-221-5060	X		X				
A 2 B Auto	Cedric Christopher	Owner	4315 W. 29th Street	Little Rock	Arkansas	72204			X	X				
A Private Affair Catering	Nancy McKenzie	Owner	5923 Kavanaugh Blvd	Little Rock	Arkansas	72117			X	X				
A Rodeway Inn & Suites	Mahesh Patel	Owner	2401 W. 65th Street	Little Rock	Arkansas	72209	501-975-6744		X	X				
AA Good Catering	Andre Bernard	Owner	197 Pebble Beach Drive	Little Rock	Arkansas	72212			X	X				
Abrahams Development Center	Chilanda Yancy	Owner	1224 S Ringo Street #A-B	Little Rock	Arkansas	72201	501-372-0699		X	X				
Academic Intelligence	Arlene Welch	Owner	6309 Shadybrook Drive	Little Rock	Arkansas	72204	501-407-0209		X	X				
Adkins Day Care	Shirley Adkins	Owner	9617 Wilderness Road	Little Rock	Arkansas	72209	501-562-2147		X	X				
All Nation Catering	Ernell Morris	Owner	3701 Barrow Road	Little Rock	Arkansas	72204	501-960-8758		X	X				
Al-Licensed Child Care Family Home	Deborah Butler-Allen	Owner	39 Lakeside Drive	Little Rock	Arkansas	72204	501-570-8427		X	X				
Andina Café	Curtis Westbrook	Owner	400 President Clinton Avenue	Little Rock	Arkansas	72201	501-376-2326		X	X				

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Company Name	Contact Person	Title	Address	City	State	Zip	Phone#	CTS	FOG	LIC	MFG	HAZ	H_2O	AT&T
Arkansas Transmission Specialist	Chris Brewer	Owner	6015 Mitchell Drive	Little Rock	Arkansas	72209	501-366-1514		X	X				
Auntie's Daycare	Don Campbell	Owner	9510 Geyer Springs Road #A	Little Rock	Arkansas	72209	501-562-2266		X	X				
Bale Chevrolet			13101 Chenal Pkwy	Little Rock	AR	72212			X			X		
Bale Collision			100 N Cross St	Little Rock	AR	72201	375-0910		X			X		
Bennett's Catering LLC	Alan Bennett	Owner	12111 W Markham Street	Little Rock	Arkansas	72211	501-225-2700		X	X				
Best Value Inn & Suites	Ketan Bhakta	Owner	7900 Scott Hamilton Drive	Little Rock	Arkansas	72209	501-562-2694		X	X				
Big D's Auto Repair	Ditanion Alexander	Owner	2122 Thayer Street	Little Rock	Arkansas	72202	501-612-6571		X	X				
Big Mike's	Michael Rainey	Owner	13305 Asher Road	Little Rock	Arkansas	72206			X	X				
Bill Terrys Collision Repair Center			505 Rector St	Little Rock	AR	72202	315-1662		X			X		
Binki's Bar-B-Que Restaurant	Benita Carroll	Owner	4 Farmington Court	Little Rock	Arkansas	72227	501-374-0011		X	X				
Blue Coast Burrito	Ryan Hamra	Owner	14810 Cantrell Road	Little Rock	Arkansas	72223	501-772-9247		X	X				
Buddo's Emporium & Market	Lawrence Butler	Owner	2718 South Arch Street	Little Rock	Arkansas	72206	501-944-4231		X	X				
Bug & Alice Marketplace	Evelyn Akins	Owner	4008 Frazier Pike	Little Rock	Arkansas	72206	501-490-1896		X	X				
Burger King	David Flis	Owner	12001 Colonel Glenn Road	Little Rock	Arkansas	72210	501-954-9598		X	X				
C & A Subs Inc	Tim Cobb	Owner	12312 Chenal Parkway #40	Little Rock	Arkansas	72211			X	X				
C & C Club 4200	Charles Webb	Owner	4310 Asher Avenue	Little Rock	Arkansas	72209	501-666-0362		X	X				
C & S Deli, Inc			11711 Hermitage Road #1	Little Rock	Arkansas	72211	501-224-0993		X	X				
Cesarito's Cyber Café	Corina Pacheco	Owner	4918 Baseline Road #12	Little Rock	Arkansas	72209			X	X				
Chenal Adult Day Services	Lynda Sikes	Owner	400 Hardin Road #140	Little Rock	Arkansas	72211	501-351-5890		X	X				
Chickenman Meat Mart	Byron Goode	Owner	16126 Prairie Lane	Little Rock	Arkansas	72206	501-240-3672		X	X				
Chicot Tire Shop	Giron Hector & Elmer	Owner	8024 Chicot Road	Little Rock	Arkansas	72206	501-442-2545		X	X				
Chrome City Custom Wheels	Robert Oneal	Owner	5601 Asher Avenue	Little Rock	Arkansas	72204	501-562-0505		X	X				
Coffee Beanery At Chenal	R Riva	Owner	17200 Chenal Parkway #200	Little Rock	Arkansas	72223	501-821-7747		X	X				
Coffeehour LLC	Rudy Yustana	Owner	156 Challain Drive	Little Rock	Arkansas	72223	501-868-7317		X	X				
Cook Jeep Eagle	Rodger Cook		1000 Main St	Little Rock	AR	72202			X			X		
Crain Chevrolet			6700 South Iniversity	Little Rock	AR	72209	542-5534		X			X		
Crew Restaurant and Pub	Scott Holtzhouser	Owner	11525 Cantrell Road #924	Little Rock	Arkansas	72212	845-430-2869		X	X				
Cummins Mid-South Inc.			6600 Interstate I-30	Little Rock	AR	72209	569-5656		X			X		
Cynthia's Child Care	Cynthia Wilson	Owner	30 Regency Circle	Little Rock	Arkansas	72209	501-565-1952		X	X				
Delta Transmission Service	Jerry Bonds		7519 Preston DR	Little Rock	AR	72209			X			X		
Diomand International Trucks	Rocky Zinser		910 E 6th	Little Rock	AR	72203	374-6474		X			X		
Divine Enchancements Learning Acedemy, LLC	Turronda Black	Owner	7515 Geyer Springs Road	Little Rock	Arkansas	72209	501-563-9032		X	X				
Doggy Duds and Suds	Sharon Lemons	Owner	8609 W Markham Street #1	Little Rock	Arkansas	72205	501-225-7837		X	X				
Drama Child Entertainment	David Strickland	Owner	1805 Fair Oaks Drive	Little Rock	Arkansas	72204	501-774-9175		X	X				
D'RN Good Subs	April Cullins	Owner	8419 Baseline Road #22	Little Rock	Arkansas	72209	501-541-0680		X	X				
D's Catering Inc.	Phillip Mcneely	Owner	629 Jack T. Stephens Drive	Little Rock	Arkansas	72205	501-526-6441		X	X				
Duff Produce	Ronnie Duff	Owner	8116 E Mellwood Road	Little Rock	Arkansas	72204	501-309-5500		X	X				
Eight Ball Billiards	Diaz Arnoldo	Owner	10402 Stagecoach Road	Little Rock	Arkansas	72209	501-407-0708		X	X				
El Torito	Ramiro Valadez	Owner	1001 S Bowman Road #3	Little Rock	Arkansas	72211			X	X				
Emma's TaQueria	Antonio Monterego	Owner	5400 Wycliffe Drive	Little Rock	Arkansas	72209			X	X				
Express Mobile Detailing			2324 Wentwood Valley Drive	Little Rock	Arkansas	72212	501-353-1020		X	X				
E-Z Food Mart	Suk Chang	Owner	4401 W 12th Street	Little Rock	Arkansas	72204	501-664-7682		X	X				
E-Z Food Mart #11	Suk Chang	Owner	4423 W 12th Street	Little Rock	Arkansas	72204	501-661-0110		X	X				
Farmer's Daughter Café	Susan Allen	Owner	120 S Commerce Street	Little Rock	Arkansas	72201	501-374-8204		X	X				
Five Eggs	Sarah Lair	Owner	708 N Pierce Street	Little Rock	Arkansas	72205	501-664-4702		X	X				
Forever Yours Catering	Ulysses Wafford	Owner	9300 Treasure Hill Road #1101	Little Rock	Arkansas	72227	501-744-8472		X	X				
French Quarter Po-Boy's	Barney Shelton	Owner	48 Berkshire Drive	Little Rock	Arkansas	72204	501-663-6046		X	X				
Fresh Fruit & Vegtables	Eddie Mcclendon	Owner	2117 Maple Street	Little Rock	Arkansas	72204	501-416-9396		X	X				
Gadwall's Grill-West	Karen Bryant	Owner	14710 Cantrell Road #1a	Little Rock	Arkansas	72223	501-868-4746		X	X				
Garden of Eden Sweets	Donna Fendley	Owner	11220 N Rodney Parham Road #5	Little Rock	Arkansas	72212	501-225-5171		X	X				
Gina's Sushi and Grill	Wu Tzu-Ying	Owner	9108 N Rodney Parham Road #304	Little Rock	Arkansas	72205	501-223-0808		X	X				
Git Bread Ent.	Bilal Muhammad	Owner	1200 Barrow Road #213	Little Rock	Arkansas	72205	501-378-7784		X	X				
Gomez Estate Coffee, LLC	Eduardo Gomez	Owner	2609 W 18th Street	Little Rock	Arkansas	72202	501-244-0918		X	X				
Goodtimes	Kimberly Hughes	Owner	3910 Asher Avenue	Little Rock	Arkansas	72214	501-943-7311		X	X				
Goodyear Auto Service Center			8014 Geyer Springs	Little Rock	AR	72209	565-0362		X			X		
Great American Cookies	Assad Sia	Owner	6000 W Markham Street #3032	Little Rock	Arkansas	72205	501-293-2163		X	X				
Hadley's Arcade & Deli	Timothy Hadley	Owner	4424 Frazier Pike	Little Rock	Arkansas	72206			X	X				
Harold's Stores, Inc			201 N University Avenue #120	Little Rock	Arkansas	72205			X	X				
Harris Garage	Johnny Harris	Owner	5200 S University Avenue	Little Rock	Arkansas	72209	501-563-1731		X	X				

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Company Name	Contact Person	Title	Address	City	State	Zip	Phone#	CTS	FOG	LIC	MFG	HAZ	H_2O	AT&T
Heartbeat to Heartbeat CAN School & Allied	June Nelson	Owner	6904 Geyer Springs Road #1	Little Rock	Arkansas	72209	501-562-6540		X	X				
Heavenly Hands Catering & Decorating	Trophena Nicholson	Owner	4620 W 12th Street	Little Rock	Arkansas	72204	501-541-3733		X	X				
Higher Learning	Melody Miller	Owner	6520 Baseline Road	Little Rock	Arkansas	72209	501-570-4001		X	X				
House of Philly & More	Christopher Bruce	Owner	402 S Louisiana Street	Little Rock	Arkansas	72201	501-838-3535		X	X				
How Joy Chinese Restaurant	Hsu-Yu Huang	Owner	7500 Baseline Road	Little Rock	Arkansas	72209			X	X				
Hubbard Childcare	Myia Hubbard	Owner	6724 Carolina Drive	Little Rock	Arkansas	72209			X	X				
Hunan Balcony	Huazhen Lu	Owner	2817 Cantrell Road	Little Rock	Arkansas	72202	501-666-8889		X	X				
Ice Daddy's Snow Shack	Tracy Smith	Owner	30620 Bandy Road	Little Rock	Arkansas	72223	501-680-6674		X	X				
Invite a Chef	Jim Auger	Owner	6505 Reed Trail	Alexander	Arkansas	72002	501-821-2758		X	X				
Izard Street Mini Mart	Waverly Jones	Owner	821 W Daisy L Gatson Bates Drive	Little Rock	Arkansas	72202	501-744-1066		X	X				
J and J Mobile Concession	John Eddings	Owner	24309 Amanda Drive	Mabelvale	Arkansas	72103	501-557-5145		X	X				
JO Brooks Body Shop	James Owen Brooks		6700 S. University	Little Rock	AR	72209			X			X		
Jones & Sons Auto headliners	Marlon Jones	Owner	5923 S University Avenue #A	Little Rock	Arkansas	72209	501-945-4648		X	X				
K & K Restaurant	Kelvin Wiggins	Owner	7515 Geyer Springs Road #4	Little Rock	Arkansas	72209	501-804-9863		X	X				
Koto Restaurant	Chi I-Kang	Owner	17200 Chenal Parkway #100	Little Rock	Arkansas	72223	501-821-7200		X	X				
Kris & Sam's the Cookies Store and More	Vicki Adams	Owner	1208 S Bowman Road	Little Rock	Arkansas	72211	501-223-3110		X	X				
Kydz R the Future	Adrianne Love	Owner	5717 W 12th Street	Little Rock	Arkansas	72204	501-614-9533		X	X				
LA Comidilla	Francisco Martinez	Owner	7500 Baseline Road	Little Rock	Arkansas	72209	501-562-7546		X	X				
La Dolce Vita Inc.	Aimee Gibbs	Owner	11815 Mara Lynn Road #1	Little Rock	Arkansas	72211	501-228-2223		X	X				
La Quinta Inn & Suites #2010			617 S Boradway Street	Little Rock	Arkansas	72201	501-374-9000		X	X				
Larry's Pizza	Eddie Craft	Owner	10310 Chicot Road	Little Rock	Arkansas	72209	501-565-6006		X	X				
Linda's Little Den	Linda Butler	Owner	8600 Shiloh Drive	Mabelvale	Arkansas	72103	501-407-0086		X	X				
Linnie's Rock Aby Baby Daycare	Linnie Moses	Owner	7210 Deer Meadow Drive	Little Rock	Arkansas	72209	501-565-6556		X	X				
Little Angels Academy			4124 W 11th Street	Little Rock	Arkansas	72204	501-664-6721		X	X				
Little Red Apple	Ella Gilbert	Owner	7 Kipling Court	Little Rock	Arkansas	72209	501-744-5459		X	X				
Little Rock Dodge			5809 S. University	Little Rock	AR	72209			X			X		
Los Jarros	Raul Narvaez	Owner	5412 Baseline Road #E	Little Rock	Arkansas	72209			X	X				
Love's Childcare	Katherine Williams	Owner	6115 Lyndell Drive	Little Rock	Arkansas	72209	501-568-0978		X	X				
M.R. & B's Kiddie College	Libby Jefferson	Owner	4 N lane	Little Rock	Arkansas	72209	501-562-6020		X	X				
M3 Motivations Mini Mall	Venita Franklin	Owner	1307 Barrow Road #D	Little Rock	Arkansas	72204	501-249-1854		X	X				
MAACO Auto Painting			6101 W 65th St.	Little Rock	AR	72209			X			X		
Mac Subway Inc	Mauricio Aguilar	Owner	9601 Lile Drive	Little Rock	Arkansas	72205			X	X				
Mad Pizza	Wesley Cole	Owner	12911 Cantrell Road #21	Little Rock	Arkansas	72223	501-224-8804		X	X				
Magic Automotive	Kahraman Aslan	Owner	4624 W 12th Street	Little Rock	Arkansas	72206	501-541-5774		X	X				
Manis Popcorn and Gift	Jim Dziga	Owner	700 E 9th Street #10-E	Little Rock	Arkansas	72202	501-375-3221		X	X				
Mi Lindo Michoacan	Jose Luis Reyes	Owner	7610 Geyer Springs Road	Little Rock	Arkansas	72209	501-562-6225		X	X				
Mi Ranchito V	Alex P Jasso	Owner	1520 Market Street #100	Little Rock	Arkansas	72211	501-217-8963		X	X				
Moe's Southwest Grill	Melanie Hoggard	Owner	12312 Chenal Parkway #1	Little Rock	Arkansas	72211	501-223-3378		X	X				
Moonlight Child Care	Khadijah Uqdah	Owner	100 Crystal Court	Little Rock	Arkansas	72205	501-614-9865		X	X				
Mrs. Pat's Home Daycare	Patricia Culverson	Owner	6801 Woodson Road	Little Rock	Arkansas	72209	501-569-9192		X	X				
Mrs. Shan's Angels	Shantella Colvin	Owner	17 Hatfield Drive	Little Rock	Arkansas	72209	501-510-0091		X	X				
Ms. Jackie's Daycare	Jackie Smith	Owner	22 Hatfield Drive	Little Rock	Arkansas	72209	501-562-6261		X	X				
Munchees To Go	Terry Wilburn	Owner	300 S University Avenue	Little Rock	Arkansas	72205			X	X				
Neal's Mobile Smoked Meats	Terry Neal	Owner	10904 Appomattox Drive	Mabelvale	Arkansas	72103	501-912-8474		X	X				
Neighborhood Grocery	Sang Jung	Owner	4423 W 12th Street	Little Rock	Arkansas	72204	501-661-0110		X	X				
New Beginnings Christian Childcare Center	Zoshua Shelton	Owner	9802 Tamela Drive	Little Rock	Arkansas	72209			X	X				
Next Level Auto Detail Salon	Don Brown	Owner	9215 Colonel Glenn Road	Little Rock	Arkansas	72204	501-580-9626		X	X				
Ozark Mountain Nut Roasters	James Dobry	Owner	6000 W Markham Street	Little Rock	Arkansas	72205	501-412-0759		X	X				
Pamela's In Home Daycare	Pamela Culbertson	Owner	5403 Halifax Drive	Little Rock	Arkansas	72209	501-565-3404		X	X				
Paragould Pizza Inc.	Eric Boulden	Owner	7520 Cantrell Road	Little Rock	Arkansas	72205	501-666-6400		X	X				
Parker Cadillac Inc.			1700 N. Schackleford Rd.	Little Rock	AR	72212			X			X		
Parker's Grill	Lawrence Parker	Owner	4410 Pine Cone Drive	Little Rock	Arkansas	72209	501-374-1772		X	X				
Perry's Shrimp	Perry Sharp	Owner	4510 Meadow Ridge Lane	Alexander	Arkansas	72002	501-772-4114		X	X				
PK's Auto Spa	Phillip Huffmaster	Owner	6424 W 65th Street	Little Rock	Arkansas	72209	501-758-0824		X	X				
PK's Phillips 66	John Mock	Owner	8209 Geyer Springs Road	Little Rock	Arkansas	72209			X	X				
Pyron Carwash LLC			4508 Baseline Road	Little Rock	Arkansas	72209	501-663-7139		X	X				
Quality Concessions	Curtis Keith	Owner	7817 Claybrook	Mabelvale	Arkansas	72103	501-663-3490		X	X				
Quality Ford Inc.			112200 W. Markham	Little Rock	AR	72211			X			X		
Quality Oil Change II	Michael Jordan	Owner	8625 W Markham Street	Little Rock	Arkansas	72205	501-225-3105		X	X				

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Company Name	Contact Person	Title	Address	City	State	Zip	Phone#	CTS	FOG	LIC	MFG	HAZ	H_2O	AT&T
Quick Lube and Oil Change, Inc	Donald Vining	Owner	8705 Geyer Springs Road	Little Rock	Arkansas	72209	501-562-5823		X	X				
R & K Pressure Washing	Roberto Herrera	Owner	6023 Boyle Park Road	Little Rock	Arkansas	72204	501-666-5567		X	X				
Ranch Kids Day Care	Ellen Dugan	Owner	6020 Ranch Drive #3	Little Rock	Arkansas	72223	501-868-4474		X	X				
Restaurant Y Tienda Karitas	Corina Pachero	Owner	4918 Baseline road #10-11	Little Rock	Arkansas	72209	501-562-1980		X	X				
Riverside Motors			1403 Rebsman Park Road	Little Rock	AR	72202			X			X		
Robinson Child Care & Development Center	Wilma Robinson	Owner	1102 W 21st Street	Little Rock	Arkansas	72206	501-372-0330		X	X				
Rumba and The Revolution Room	Awbrey Suzon	Owner	300 President Clinton Avenue	Little Rock	Arkansas	72201	501-823-0090		X	X				
S & J Café	Floyd Smith	Owner	103 E 7th Street #2	Little Rock	Arkansas	72201	501-944-7135		X	X				
Sai Subway Stores Inc.	Srinivasa Bande	Owner	103 E 7th Street #115	Little Rock	Arkansas	72210	501-376-7827		X	X				
Sav-O-Meats	Tracy Phifher	Owner	13216 Interstate 30	Little Rock	Arkansas	72210	501-407-0995		X	X				
Smith's Vending Mobile	Elvin Smith	Owner	2904 Gilman Street	Little Rock	Arkansas	72204	501-309-6437		X	X				
Sparkle Paint & Body Shop	Calvin Franklin	Owner	3824 W 12th Street	Little Rock	Arkansas	72204	501-663-3766		X	X				
Sweet Pea Daycare Center	Catina Williams	Owner	6004 Lyndell Drive	Little Rock	Arkansas	72209	501-562-1563		X	X				
Taco Youis	Ricardo Martinez	Owner	10 Gourgues Lane	Little Rock	Arkansas	72209	501-565-2047		X	X				
Tacos Guanajuato #2	Simon Rodriquez	Owner	8900 Geyer Springs Road	Little Rock	Arkansas	72209	501-749-5642		X	X				
Tacos Y Mariscos De Sinaloa	Jose Torres	Owner	4023 S Shackleford Road #112	Little Rock	Arkansas	72204	501-217-9805		X	X				
Tank's	James Crawford	Owner	3110 W 12th Street	Little Rock	Arkansas	72204	501-838-4992		X	X				
Taqueria las Marqaritas	Margarita Martnez	Owner	7616 Colonel Glenn Road	Little Rock	Arkansas	72204			X	X				
Terri Lynn's	Aaron Hether	Owner	10102 N Rodney Parham Road	Little Rock	Arkansas	72207	501-227-6371		X	X				
The Box	Kelly Joiner	Owner	1623 Main Street	Little Rock	Arkansas	72206	501-372-8735		X	X				
The Conversion Center	Thomas Lott	Owner	1200 Barrow Road #108	Little Rock	Arkansas	72205	501-658-3887		X	X				
The Hop	Mike Isgrig	Owner	7706 Cantrell Road	Little Rock	Arkansas	72207			X	X				
The Italian Catering	Michael Waters	Owner	2618 W 12th Street	Little Rock	Arkansas	72202	501-372-4448		X	X				
The Last Detail			86 Aberdeen Drive	Little Rock	Arkansas	72223	501-868-7878		X	X				
The Party House	Deloise Mcdaniel	Owner	4420 W 20th Street	Little Rock	Arkansas	72204			X	X				
Thompson Coffee Company	Jose Thompson	Owner	48 Heatherbrae Circle	Little Rock	Arkansas	72223	501-336-4494		X	X				
Thy Olive Tree	Olivia Sims	Owner	8912 W 36th Street	Little Rock	Arkansas	72204	501-224-2869		X	X				
Tienda y Taqueria Mexico	Martha Rojas	Owner	4918 Baseline Road #10-12	Little Rock	Arkansas	72209	501-562-1338		X	X				
Timmons Lunch	Tim Timmons	Owner	103 E 7th Street	Little Rock	Arkansas	72201	501-378-7799		X	X				
Tiny Tots II Enterprises	Ashlee Williams	Owner	6320 Scott hamilton Drive	Little Rock	Arkansas	72209	501-565-9700		X	X				
TNT's Catering	Tommy Williams	Owner	7805 W 44th Street	Little Rock	Arkansas	72204	501-612-5204		X	X				
Tortilleria El Leon	Rafael Martinez	Owner	7620 Colonel Glenn Road	Little Rock	Arkansas	72204			X	X				
Triple J Foods Inc	Stephen Johnson	Owner	7520 Cantrell Road	Little Rock	Arkansas	72204	501-666-6400		X	X				
Tri-State Mack Inc.	James Maddox		4614 Thibault RD	Little Rock	AR	72206			X			X		
Unique Childcare	Jonique Powell	Owner	9701 Woodland Drive	Mabelvale	Arkansas	72103			X	X				
Variety Wings & Rib Shop	Arthur Gamble	Owner	7510 Baseline Road #A	Little Rock	Arkansas	72204	501-562-8600		X	X				
Vision Motors, Inc.	Joe Vincent	Owner	900 E 9th Street	Little Rock	Arkansas	72202			X	X				
Visions Tea Company	Frazier Rogers	Owner	4200 Hoerner Road	Little Rock	Arkansas	72209	501-801-2532		X	X				
W 12th Street Market	Hong Lee	Owner	4511 W 12th Street	Little Rock	Arkansas	72204	501-664-0220		X	X				
Wheels and Grills	Oranda Smith	Owner	1423 Wright Avenue	Little Rock	Arkansas	72206			X	X				
Woodrow Food Mart	Aisha Kattorn	Owner	1817 S Woodrow Street	Little Rock	Arkansas	72204			X	X				
Wright Avenue Super Store	Wael karakra	Owner	1901 Wright Avenue	Little Rock	Arkansas	72202	501-240-7763		X	X				

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Medical Survey List

Company Name	Person Name	Address	City	State	Zip	Date Mailed	Date Returned
Ark. Maxillofacial Surgery Center	Scott A. Schoen, DDS	21 Corporate Hill #200	Little Rock	AR	72205	5/10/2007	
B R G, LLC	Paul Burton, DDS	8116 Cantrell, Suite C	Little Rock	AR	72227	5/10/2007	5/17/2007
Endodontic Associates of Arkansas	Harvey Matheny, DDS	1225 Breckenridge Drive, Suite 203	Little Rock	AR	72205	5/10/2007	
Family Dental Care	Richard C. Tate, DDS	11327 Arcade, Suite D	Little Rock	AR	72212	5/10/2007	
Height Dental Clinic		1919 North Fillmore	Little Rock	AR	72207	5/10/2007	
Hinson Rentals, LLC	Lee R. Hinson, Jr. , DDS	5304 Mabelvale Pike	Little Rock	AR	72209	5/10/2007	5/17/2007
James E. Moore, Jr., DDS	University Professional Build	200 South University Avenue	Little Rock	AR	72205	5/10/2007	
Landmark Dental Center	Tara P. Scallion, DDS	3401 Atwood Road, Suite D	Little Rock	AR	72206	5/10/2007	
Leslie P. Cooner, DDS	Centermark Building	10220 West Markham, Suite 120	Little Rock	AR	72207	5/10/2007	
Little Rock Diagnostic Clinic	Lynn Claud, Director of Oper	10001 Lile Drive	Little Rock	AR	72205	5/10/2007	5/18/2007
Monarch Dental Associates		301 North Shackleford	Little Rock	AR	72211	5/10/2007	
Monarch Dental Associates	Tom Harris, DDS	5326 West Markham	Little Rock	AR	72205	5/10/2007	
Myofacial Pain Center	Herman E. Hurd, DDS	500 S. University, Ste. 605	Little Rock	AR	72205	5/10/2007	
Robert E. Anderson, DDS	Parkview Medical Building, S	#1 St. Vincent Circle	Little Rock	AR	72205	5/10/2007	
Smiles by Design	Allen A. Smith, DDS	2516 Cantrell Road, Ste. D	Little Rock	AR	72202	5/10/2007	
Southwest Medical Arts Bldb.	Gary N. Rollins, DDA	11321 Interstate 30, Suite 307	Little Rock	AR	72209	5/10/2007	7/6/2007
Vowell Dental Center	John G. Vowell, DDS	5301 West 65th Street	Little Rock	AR	72209	5/10/2007	
	Rea F. Graves, DDS	9100 Geyer Springs Road	Little Rock	AR	72209	5/10/2007	
	William L. Cloud, DDS	12361 Hinson Road, Suite B	Little Rock	AR	72212	5/10/2007	
	Blake Weber, DDS	7924 Cantrell Road	Little Rock	AR	72227-2494	5/10/2007	
	Jerry Richardson, DDS	-209 State Street	Little Rock	AR	72201	5/10/2007	6/7/2007
	B.R. Machen, DDS	500 South University, Suite A-23	Little Rock	AR	72205	5/10/2007	
	Michael D. Zweifler, DDS	623 Main Street	Little Rock	AR	72201	5/10/2007	
	Shirley E. Reid, DDS	805 North Palm Street	Little Rock	AR	72205	5/10/2007	
	Russell & Schneider, DDS	2002 North University	Little Rock	AR	72207	5/10/2007	
	Chester F. Hight, DDS	523 North University	Little Rock	AR	72205	5/10/2007	7/6/2007
	Jerry Jewell, DDS	721 East 21st Street	Little Rock	AR	72206	5/10/2007	
	A.C. Brizzolara, III, DDS	10310 West Markham, Suite 201	Little Rock	AR	72205	5/10/2007	
	Thomas H. Turner, DDS	1216 Fair Park Blvd.	Little Rock	AR	72204	5/10/2007	
	Mark S. Murphy, DDS	8500 West Markham, #233	Little Rock	AR	72205	5/10/2007	
	W. T. Fletcher, DDS	10319 West Markha, Suite 500	Little Rock	AR	72205	5/10/2007	
	Anita L. Aebersold, DDS	820 North University Avenue	Little Rock	AR	72205	5/10/2007	6/1/2007
	William M. Flurry, DDS	7301 Baseline Road	Little Rock	AR	72209	5/10/2007	5/17/2007
	Burton, DDS	8116 Cantrell Road, Suite C	Little Rock	AR	72205	5/10/2007	
	Donald D. Cobb, DDS	6600 Baseline Road	Little Rock	AR	72209	5/10/2007	5/25/2007
	Faremeh Hadjian, DDS	5717 West 12th Street	Little Rock	AR	72204	5/10/2007	
	George E. Gillian, DDS	9700 West Markham	Little Rock	AR	72205	5/10/2007	5/14/2007
	Jim A. Orsini, DDS	5326 West Markham	Little Rock	AR	72205	5/10/2007	
	Donald A. Deems, III, DDS	7509 Cantrell Road, #208	Little Rock	AR	72207	5/10/2007	
	Mel Collazo, DDS	11811 Hinson Road, Suite 100	Little Rock	AR	72212	5/10/2007	6/1/2007

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	William L. Humphries, DDS	11215 Hermitage Road, Suite 100	Little Rock	AR	72211	5/10/2007	
	Tom Roberts & Tom Bailey	3801 Woodland Heights	Little Rock	AR	72212	5/10/2007	
	Terry C. Welson, DDS	9601 North Rodney Parham Road	Little Rock	AR	72207	5/10/2007	
	Tracy T. Windham, DDS	5500 West Markham	Little Rock	AR	72205	5/10/2007	6/1/2007
			Little Rock	AR	72205	5/10/2007	
Kitchens Pediatric Dentistry	Robert W. Debin & Clovis A.	10310 West Markham, Suite 202	Little Rock	AR	72205	5/10/2007	5/17/2007
	John W. Hatley, DDS	9501 North Rodney Parham	Little Rock	AR	72207	5/10/2007	
	Daniel A. Liebong, DDS	8822 Chicot Road	Little Rock	AR	72209	5/10/2007	
	Charles Vondran, Jr., DDS	10311 West Markham	Little Rock	AR	72205	5/10/2007	
	David Wardlaw, DDS	8315 Cantrell Road, Suite 100	Little Rock	AR	72227	5/10/2007	
	Kelley & Robert Thompson,	6226 Baseline Road	Little Rock	AR	72209	5/10/2007	
	John E. Svendson, DDS	16101 Lagrande Drive, Suite 101	Little Rock	AR	72223	5/10/2007	
	Sam D. Nickol, DDS	10 Office Park Drive	Little Rock	AR	72211	5/10/2007	
	James T. Bush, Jr., DDS	1215 Breckenridge	Little Rock	AR	72205	5/10/2007	5/21/2007
	Ed Knight, DDS	9601 Lile Dr. - Medical Towers Bldb.	Little Rock	AR	72205	5/10/2007	
	Fallon A. Davis, DDS	10319 West Markham, Suite 100	Little Rock	AR	72205	5/10/2007	5/17/2007
	D.J. Dailey, III, DDS	17200 Chenal Parkway, Suite 400	Little Rock	AR	72223	5/10/2007	
	Gilbert G. Caver, DDS	5307 Kavanaugh Blvd.	Little Rock	AR	72207	5/10/2007	5/17/2007
	Michael Ashcraft, DDS	1415 Breckenridge Drive	Little Rock	AR	72227	5/10/2007	
	Richard C. Meyer, DDS	10319 West Markham, Suite 200	Little Rock	AR	72205	5/10/2007	
	Lonnie C. Warren, DDS	11601 West Markham, Suite C	Little Rock	AR	72211	5/10/2007	
	Billy R. Machen, DDS	9200 Chicot Road	Little Rock	AR	72207	5/10/2007	
	George B. Morledge, III, DDS	5 Office Park Drive, Suite 104	Little Rock	AR	72211	5/10/2007	5/23/2007
	Roy R. Jolley, DDS	#5 Van Circle	Little Rock	AR	72207	5/10/2007	
	Samuel M. Strong, DDS	1415 Breckenridge Drive, Suite D	Little Rock	AR	72227	5/10/2007	5/21/2007
	Wesley C. Hamilton, DDS	7622 Morris Drive	Little Rock	AR	72209	5/10/2007	5/17/2007
	Roosevelt Brown, DDS	721 East 21st	Little Rock	AR	72206	5/10/2007	
	Garry L. Hargis, DDS	8211 Geyer Springs Road	Little Rock	AR	72209	5/10/2007	
	Jay R. Owens, DDS	12th and University Avenue	Little Rock	AR	72204	5/10/2007	
	Martin B. Menees, Jr., DDS	1808 North Taylor	Little Rock	AR	72207	5/10/2007	6/22/2007
	Dale Miller, DDS	6701 West 12th Street, Suite 8	Little Rock	AR	72204	5/10/2007	
	Donald P. Callan, DDS	10319 West Markham, Suite 300	Little Rock	AR	72205	5/10/2007	
	Jerry E. Bradley, DDS	1225 Breckenridge, Suite 110	Little Rock	AR	72205	5/10/2007	
	Samuel Wofford, DDS	500 South University, Suite 700	Little Rock	AR	72205	5/10/2007	
	James L. Bevans, DDS	300 South Rodney Parham, Suite 3	Little Rock	AR	72205	5/10/2007	
	Gary Weasely, DDS	#3 Office Park Drive	Little Rock	AR	72211	5/10/2007	
	Ballenger & Gore, DDS	11 Office Park	Little Rock	AR	72211	5/10/2007	
	William T. Harris, Jr., DDS	6800 Baseline Road	Little Rock	AR	72209	5/10/2007	5/15/2007
	Leif Lorenz, DDS	10319 West Markham	Little Rock	AR	72205	5/10/2007	5/15/2007
	Bruce F. Mitchell, DDS	500 South University, Suite 511	Little Rock	AR	72205	5/10/2007	
	Lee C. Wyant, DDS	315 Bowman Road, Suite 5	Little Rock	AR	72211	5/10/2007	

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	Jeffrey K. Garner, DDS	10809 Executive Ctr. Dr., Suite 101	Little Rock	AR	72211	5/10/2007	6/22/2007
	Wendell C. Thompson, DDS	10025 West Markham, Suite 250	Little Rock	AR	72205	5/10/2007	5/23/2007
	Fredrick L. Church, Jr., DDS	10310 West Markham, Suite 301	Little Rock	AR	72205	5/10/2007	5/17/2007
	Dale Fallis, DDS	10500 W. Markham Square, Ste. 104	Little Rock	AR	72205	5/10/2007	
	Tramel & Alley, DDS	1225 Breckenridge Dr., Ste. 207	Little Rock	AR	72205	5/10/2007	
	Tomi McCall, DDS	1304 Wright Avenue	Little Rock	AR	72206	5/10/2007	
	George Platt, DDS	904 Autumn Road, Suite 450	Little Rock	AR	72211-2887	5/10/2007	
	John Hargett, DDS	14000 Cantrell Road	Little Rock	AR	72212	5/10/2007	
	Joseph Mazurek, DDS	6500 Base Line Road	Little Rock	AR	72209	5/10/2007	
	Gene Jines, DDS	12501 Cantrell Road	Little Rock	AR	72223	5/10/2007	
	Tony Tortorich, DDS	8500 West Markham, Suite 330	Little Rock	AR	72205	5/10/2007	
	Kathleen Ederle, DDS	413 North University	Little Rock	AR	72205	5/10/2007	
	Brock W. Brown, DDS	11715 Rain Wood, Suite 2-A	Little Rock	AR	72212	5/10/2007	
	John R. Bass, DDS	13500 Otter Creek Parkway	Little Rock	AR	72209	5/10/2007	5/14/2007
	Scott J. Scallion, DDS	8500 West Markham, Suite 331	Little Rock	AR	72205	5/10/2007	
	Paul C. Peek, DDS	101 West 24th Street	Little Rock	AR	72206	5/10/2007	
	Rickey G. Perry, DDS	10411 West Markham, #100	Little Rock	AR	72205	5/10/2007	
	Richardson & Monroe, DDS	9601 Lile Drive, Suite 1A	Little Rock	AR	72205	5/10/2007	
	Steve Mangan, DDS	2011 North Van Buren	Little Rock	AR	72207	5/10/2007	5/22/2007
	Drake A. Hawkins, DDS	1215 Breckenridge	Little Rock	AR	72205	5/10/2007	
	Michael Pohlkamp, DDS	11815 Mara Lynn, Suite 6	Little Rock	AR	72211	5/10/2007	6/1/2007
	Wilson Creighton, DDS	500 S. University Avenue, A-26	Little Rock	AR	72205	5/10/2007	
	Edward E. Sherrill, DDS	5326 W. Markham, Suite #3	Little Rock	AR	72204	5/10/2007	
	John A. Daniel, DDS	12419 Cantrall Road	Little Rock	AR	72223	5/10/2007	
	Paula Martin, DDS	1415 Breckenridge Drive, Suite B	Little Rock	AR	72227	5/10/2007	5/18/2007
	N.C. Andrews, DDS	14309 Cantrell, #6	Little Rock	AR	72212	5/10/2007	6/6/2007
	John D. Pitts, DDS	1405 West 6th	Little Rock	AR	72201	5/10/2007	
Central Arkansas Endodontics	James A. Penney, DDS	13239 Cantrell Road, Suite B	Little Rock	AR	72212	5/10/2007	5/17/2007
	Robbie R. Atkinson, DDS	9007 Kanis	Little Rock	AR	72205	5/10/2007	
	Randy Rhea, DDS	805 North Palm	Little Rock	AR	72205	5/10/2007	
Pathology Laboratories of Arkansas	Keith E. Miller, Administrator	#1 Lile Ct.	Little Rock	AR	72205	5/10/2007	5/14/2007
Arkansas Pathology Associates	Becky Webster, Business Ma	#1 St. Vencent Cr. Suite 220	Little Rock	AR	72205	5/10/2007	
Clinical Pathology Laboratory	Brenda Bruce, Operations M	500 S. University	Little Rock	AR	72205	5/10/2007	
Baseline Chiropractic Center	Edward W. Hayes, DC	5108 Baseline Road	Little Rock	AR	72209	2	
Carter Health Center	Gaylon E. Carter, DC	10805 Stagecoach Road	Little Rock	AR	72209	2	
Haley Chiropractic Life Center	Samuel S. Haley, DC	PO Box 193058	Little Rock	AR	72219-3058	2	
Little Rock Family Practice-West		4208 North Rodney Parham	Little Rock	AR	72211	2	
Little Rock Family Practics Clinic		424 North University	Little Rock	AR	72205	2	
Little Rock Foot Clinic		6105 Lee Avenue	Little Rock	AR	72205	2	
Little Rock Hematology-Oncology Assoc.		9500 Lile Drive	Little Rock	AR	72205	2	
Little Rock Internal Medicine		1100 N. University, Suite 1	Little Rock	AR	72207	2	

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Little Rock Pediatric Clinic		500 South University, #302	Little Rock	AR	72205	2	
Little Rock Pulmonary Clinic	Nancy Rector & James Flore	890 Medical Towers, 9601 Lile	Little Rock	AR	72205	2	
Little Rock Surgery Center		8820 Knoedel Court	Little Rock	AR	72205	2	
Little Rock Veterinary Clinic	Martin G. Reynolds, Jr., DVM	8112 West Markham	Little Rock	AR	72205	2	
Little Rock Zoo	Attn: Marilynn M. Baeyens, D	#1 Jonesboro Drive	Little Rock	AR	72205	2	
Market Place Medical Center	Gary Barger, MD	11400 Huron Drive	Little Rock	AR	72212	2	
Markham Heights Animal	Hospital Larry Fritcheman, D	10010 West Markham	Little Rock	AR	72205	2	
Martin Bowen Hefley Knee & Sports		5 St. Vincent Circle, Ste. 100	Little Rock	AR	72205-5415	2	
Martin Knee & Sports Medicine	Kenneth A. Martin, MD	8907 Kanis Road, #330	Little Rock	AR	72205	2	
Medical Diagnostics of Little Rock		#7 Office Park Drive, Suite 1	Little Rock	AR	72211	2	
Monarch Dental Associates		10101 Mabelvale Plaza, Suite 11B	Little Rock	AR	72209	2	
Oncology Associates		1000 N. University Ave., Ste. 100	Little Rock	AR	72207	2	
Orthoarkansas		10301 Kanis Road	Little Rock	AR	72205	2	
Otter Creak Family Clinic		11321 I-30	Little Rock	AR	72209	2	
Pain Care Medical Assoc. - East	Dwight Stewart, DC	200 East 13th Street	Little Rock	AR	72202	2	
Parkway Village Clinic		14300 Chenal Parkway	Little Rock	AR	72211	2	
Patterson Dental Supply, Inc.		PO Box 193210	Little Rock	AR	72219	2	
Paul D. Beck, MS	Attn: Nuclear Medicine Dept.	#2 St. Vincent Circle	Little Rock	AR	72205-5499	2	
Physicians Surgery Center		1024 North University	Little Rock	AR	72207	2	
Pleasant Valley Family Clinic	Jerry Carter, MD	12361 Hinson Road	Little Rock	AR	72212	2	
Pleasant Valley Veterinary Clinic		3712 Woodland Heights Drive	Little Rock	AR	72212	2	
Practice Management Services, Inc.		500 S. University, Ste. 615	Little Rock	AR	72205	2	
Presbyterian Village		510 North Brookside Drive	Little Rock	AR	72205	2	
Pulaski County TB Clinic		3915 West 8th	Little Rock	AR	72204-2028	2	
Pulaski County Vet Emergency		80 John Barrow Road	Little Rock	AR	72205	5/11/2007	
Pulmonary Associates PA	Freeway Medical Tower, Ste	5810 West 10th Street	Little Rock	AR	72204	5/11/2007	
Radiology Associates		500 South University, Ste. 108	Little Rock	AR	72205	2	
Rodney Parham Animal Clinic	Treasure Hill Center	9501 Rodney Parham	Little Rock	AR	72207	5/11/2007	
Scanner Diagnostics	c/o Radiology Consultants	9601 Lile, Suite 1100	Little Rock	AR	72215	5/11/2007	6/7/2007
Shackleford Road Vet Clinic		304 North Shackleford	Little Rock	AR	72211	5/11/2007	
Shannon X-Ray Service		3520 West 69th Street, Ste. 406	Little Rock	AR	72204	2	
Shannon X-Ray Services		6220 Stagecoach Rd.	Little Rock	AR	72204	2	
South Little Rock Sheridan Vet Clinic		5701 West 65th Street	Little Rock	AR	72209	2	
Southwest Family Clinic		6520 Baseline Road, Suite B	Little Rock	AR	72209	2	
Southwest Hospital	Attn: Dallas Stricklin	11401 Interstate 30	Little Rock	AR	72209	2	
St. Vincent Family Clinic		10000 Rodney Parham	Little Rock	AR	72207	2	
St. Vincent Family Clinic		4202 South University	Little Rock	AR	72204	2	
St. Vincent Health Clinic East		2500 East 6th Street	Little Rock	AR	72202	2	
St. Vincent Womens Screening		6101 St. Vincent Circle	Little Rock	AR	72205	2	
The Gastro-Intestional Center		405 North University	Little Rock	AR	72205	2	
The Joint Replacement		8907 Kanis Road, Ste. 300	Little Rock	AR	72205	2	

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The Surgical Clinic		9500 Kanis Road, Ste. 501	Little Rock	AR	72205	2	
The Surgical Pavilion		9500 Kanis, Ste. 401	Little Rock	AR	72205	2	
The Womans Clinic		500 S. University, Ste. 413	Little Rock	AR	72205	2	
Treasure Hill Pet Clinic		1221 Breckenridge Drive	Little Rock	AR	72205	2	
University Animal Clinic		1400 South University	Little Rock	AR	72204	2	
University of Ark. Medical Sciences		4301 West Markham, Slot 617	Little Rock	AR	72205	2	
University of Arkansas at Little Rock	Department of Chemistry	33rd and University	Little Rock	AR	72204	2	
US Orthopedics Surgery Center		8907 Kanis Road, Suite 100	Little Rock	AR	72205	2	
Walker Internal Medicine		9600 Lyle Drive, Suite 220	Little Rock	AR	72205	2	
Westbrook Animal Clinic	Jim Westbrook, DVM	3312 Malvelvale Pike	Little Rock	AR	72204	2	
Westside Open MRI & Diagnostic Center		301 N. Shackleford #B4	Little Rock	AR	72211	2	
York Chiropractic Clinic		205 North Van Buren	Little Rock	AR	72205	2	
	David D. Bryant, DC	6801 West 12th Street, Ste. E	Little Rock	AR	72204	2	
	Chester R. Blackmon, DC	7000 Cantrell Road	Little Rock	AR	72207	2	
	Vern Rowe, DC	202 South Rodney Parham, Suite A	Little Rock	AR	72205	2	
	Roland K. Brim, DC	6100 W 12th St.	Little Rock	AR	72204	2	
	Chris Cathey, DC	301 North Shackleford, Suite. #G2	Little Rock	AR	72211	2	
APMI	Stephen Tilley, MD	5905 R Street	Little Rock	AR	72207	5/11/2007	5/17/2007
Hillcrest Family Clinic	Jay Holland, MD	4601 Woodlawn	Little Rock	AR	72205	5/11/2007	5/18/2007
Breckenridge Family Practice	Edwin N. Barron, Jr., MD	10121 Rodney Parham Road, #2	Little Rock	AR	72227	5/11/2007	5/21/2007
	Joseph F. Farmer, MD	1225 Breckenridge Drive	Little Rock	AR	72205	5/11/2007	
	Wm. G. Darwin, MD	6924 Geyer Springs	Little Rock	AR	72209	5/11/2007	5/18/2007
	Gary E. Harper, MD	123 Pearl Street	Little Rock	AR	72205	5/11/2007	6/6/2007
	Archie Hearn, MD	13100 Chenal Parkway	Little Rock	AR	72215	5/11/2007	
	Gary P. Nunn, MD	1024 Scott	Little Rock	AR	72202	5/11/2007	
	Benny J. Green, MD	14309 Cantrell, Ste. 7	Little Rock	AR	72212	5/11/2007	5/17/2007
	George F. Holitik, MD	3200 Bryant	Little Rock	AR	72204	5/11/2007	
	Susan Baker, MD	9501 Lile Drive, Ste. 940	Little Rock	AR	72205	5/11/2007	
	Ronald L. Bailey, DVM	15105 Highway 10	Little Rock	AR	72212	5/11/2007	
	Daniel Hanley, DVM	26 Painted Turtle Cove	Little Rock	AR	72211	5/11/2007	
	Leslie Salmons, DVM	25 Point West Circle	Little Rock	AR	72211	5/11/2007	
West Little Rock Foot Clinic	Laurence K. Connelley, DPM	10020 West Markham	Little Rock	AR	72205	5/11/2007	5/18/2007
	H.F. Bunny Brown, III, DPM	2001 Georgia Avenue	Little Rock	AR	72207-5014	5/11/2007	
	Bev Foster, DC	2701 West Markham	Little Rock	AR	72205	5/11/2007	
Advanced Foot Care	Dr. Nathan Lucas	205 North Shackelford Road	Little Rock	AR	72211-2841	5/11/2007	
All for Kids Pediatric Clinic		904 Autumn Road, Ste. 100	Little Rock	AR	72211	5/11/2007	6/1/2007
AOC Surgery Center, Inc.		10201 Kanis Road	Little Rock	AR	72205-6358	5/11/2007	
Arkansas Back Clinic		5 st. Vincent Circle, Suite 300	Little Rock	AR	72205-5417	5/11/2007	
Arkansas Cardiology PA		9501 Lile Drive, Ste. 600	Little Rock	AR	72205	5/11/2007	
Arkansas Department of Health	Tuberculosis Program, Slot 4	4815 West Markham	Little Rock	AR	72205-3867	5/11/2007	
Arkansas Dermatology Clinic PA	Crl J. Raque, MD	500 S. University Ave., Ste. 704	Little Rock	AR	72205	5/11/2007	

Arkansas Foot Clinic		1417 West 6th Street	Little Rock	AR	72201	5/11/2007	
Arkansas Foot Clinic-West		315 West Bowman Road, Ste. 1	Little Rock	AR	72211	5/11/2007	
Arkansas Health Physics Consultants		5110 Studer	Little Rock	AR	72211	5/11/2007	
[illegible]	Doctors Park Bldg., Ste. 10	9600 Lile Drive	Little Rock	AR	72205	5/11/2007	
[illegible]	[illegible]	#1 St. Vincent Circle, Suite #410	Little Rock	AR	72205	5/11/2007	
[illegible]	[illegible]	9600 Lile Drive, Suite 700	Little Rock	AR	72205	5/11/2007	
[illegible]	Parkview Medical Office Bldg.	#1 St. Vincent Circle, #210	Little Rock	AR	72205	5/11/2007	
Arkansas Primary Care Clinics		6209 West 12th	Little Rock	AR	72219	5/11/2007	
Arkansas Speciality Care Ctr. PA		600 S. McKinley, Suite 102	Little Rock	AR	72205	5/11/2007	
Arkansas Spine Center		500 S. University, Ste. 815	Little Rock	AR	72205	5/11/2007	
Arkansas Urology Assoc. PA		9600 Lile Drive, Ste. 200	Little Rock	AR	72205	5/11/2007	
Arkansas Urology Assoc. PA	310 Parkview Medical Bldg.	#1 St. Vincent Circle	Little Rock	AR	72205	5/11/2007	
Arkansas Urology Assoc. PA		500 S. University, Suite 512	Little Rock	AR	72205	5/11/2007	
Arkrad Inc		2011 E. Roosevelt Rd	Little Rock	AR	72206	5/11/2007	
Asher Animal Clinic		6311 Asher Avenue	Little Rock	AR	72204	5/11/2007	6/15/2007
Autumn Road Family Practice		904 Autumn Road, Ste. 200	Little Rock	AR	72211	5/11/2007	5/21/2007
Ball Clinic		4208 N. Rodney Parham	Little Rock	AR	72212	5/11/2007	
Baptist Breast Center		9500 Kanis Road	Little Rock	AR	72205	5/11/2007	
Barg-Gray Clinic	Doctors Park Bldg., Suite 10	9600 Lile Drive	Little Rock	AR	72205	5/11/2007	6/1/2007
Baseline Veterinary Hospital		3819 Baseline Road	Little Rock	AR	72209	5/11/2007	6/1/2007
Bellevue Animal Clinic		7824 Cantrell Road	Little Rock	AR	72207	5/11/2007	5/17/2007
Betton Clinic	Harold B. Betton, MD	1505 West 11th	Little Rock	AR	72202	5/11/2007	
BHC Family Medicine West		9600 Lile Drive, Ste. 210	Little Rock	AR	72205	5/11/2007	
Bonnette Chiropractic Clinic		PO Box 191058	Little Rock	AR	72219	5/11/2007	
Bowman Curve Immediate Care	Drs. Angela & Robert Barrow	215 North Bowman	Little Rock	AR	72211	5/11/2007	
Briarwood Animal Hospital	W. Robert Hale, DVM	8422 Kanis Road	Little Rock	AR	72204	5/11/2007	5/23/2007
Cantrell Animal Clinic		7703 T Street at Cantrell Road	Little Rock	AR	72207	5/11/2007	
Cardiology & Medicine Clinic	Joe L. Hargrove, MD	5315 West 12th Street	Little Rock	AR	72204	5/11/2007	
Carti-Baptist		9500 Kanis Road	Little Rock	AR	72205	5/11/2007	
Central Arkansas Radiation Therapy Instutute		Markham at University	Little Rock	AR	72205	5/11/2007	
Central Medical Group	Tommy L. Love, MD	#1 St. Vincent Circle, Suite 350	Little Rock	AR	72205	5/11/2007	
Chenal Family Practice	Robert B. Kennedy, MD	11215 Hermitage Rd., Se. 103	Little Rock	AR	72211	5/11/2007	
Chiropractic Health & Rehabilitation		2701 West Markham	Little Rock	AR	72205	5/11/2007	
Cloverdale Animal Hospital		7201 Baseline Road	Little Rock	AR	72209	5/11/2007	5/25/2007
Cloverdale Clinic PA		8824 Chicot Road	Little Rock	AR	72209	5/11/2007	
Comtech Processor / X-Ray Services		11404 Beachwood Dr.	Mablevale	AR	72103	5/11/2007	
Concentra Medical Centers		10101 Mabelvale Plaza Drive, Ste. 4	Little Rock	AR	72209	5/11/2007	6/1/2007
Cornerstone Clinic for Women		#1 Lile Ct, Ste. 200	Little Rock	AR	72205	5/11/2007	6/1/2007
Crossett Animal Clinic	R.E. Dunham, DVM	4217 Atwood Road	Little Rock	AR	72206-6091	5/11/2007	
Cummings X-Ray Company		PO Box 5690	Little Rock	AR	72215	5/11/2007	
D. Onofrio Chiropractic Center		5326 West Markham Street, Suite 12	Little Rock	AR	72205-3551	5/11/2007	

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Dickson-Bennett Associates, Inc.		9 Kipling Court	Little Rock	AR	72209	5/11/2007	5/18/2007
Forrest Park Medical Clinic		1119 Van Buren	Little Rock	AR	72204	5/11/2007	
Freeway Medical Towers	Mary K. Richards, MD	5800 West 10th, Ste. 600	Little Rock	AR	72204	5/11/2007	
Geyer Springs Foot Clinic		8215 Geyer Springs Road	Little Rock	AR	72209	5/11/2007	
Green Mountain Animal Hospital	Paul Seminard, DVM	11601 N. Rodney Parham	Little Rock	AR	72221	5/11/2007	5/21/2007
Harold H. Chakales, MD	Blandford Bldg., Ste. 300	#5 St. Vincent Circle	Little Rock	AR	72205	5/11/2007	
Hickman Chiropractic Clinic		808 Reservoir Road, Suite A	Little Rock	AR	72227	5/11/2007	
Hillcrest Animal Hospital		2900 Kavanaugh Blvd.	Little Rock	AR	72205	5/11/2007	5/17/2007
Hospital Equipment Engineering Services, Inc.		13311-A Lawson Road	Little Rock	AR	72210	5/11/2007	5/17/2007
Internal Medicine Clinic		5320 West 12th	Little Rock	AR	72205	5/11/2007	
Jackman Chiropractic Health		7410 Baseline Road	Little Rock	AR	72209	5/11/2007	
Jimmerson Family Practice		6917 Geyer Springs	Little Rock	AR	72209	5/11/2007	
Landmark Animal Hospital	Susan Weinstein, DVM	1215 Archstreet Pike	Little Rock	AR	72206	5/11/2007	6/1/2007
Landmark Medical Clinic		11321 I-130, Ste. 104	Little Rock	AR	72209	5/11/2007	
Larry Watkins, MD	Doctors Bldg., Suite 402	500 South University	Little Rock	AR	72205	5/11/2007	
Leonard Rheumatology Clinic	Doctors Building, Suite 725	500 South University	Little Rock	AR	72205	5/11/2007	
Liberty Chiropractic	Chris Culpepper, DC	1203 South University	Little Rock	AR	72209	5/11/2007	
Little Rock Cardiology Clinic		#7 Shackleford West	Little Rock	AR	72211	5/11/2007	
Little Rock Childrens Clinic	Attn: Accounts Payable	11215 Hermitage Road, Suite 200	Little Rock	AR	72211	5/11/2007	
Little Rock Chiropractic	Richard L. Riley, DC	1100 West 3rd Street	Little Rock	AR	72201	5/11/2007	9/4/2007
Little Rock Dermatology Clinic		500 S. University, Suit 501	Little Rock	AR	72205	5/11/2007	

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Attachment A-2

INSTRUCTIONS FOR COMPLETING THE INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION FORM

Note: All items in the Industrial Wastewater Discharge Permit Application Form must be completed. Failure to submit a complete application could result in a delay in the renewal or issuance of your permit.

Section A - General Facility Information

1. Provide official legal name of your company and the local facility name if applicable.
2. List the local facility address where mail is received.
3. List the physical location of the local facility (street address).
4. List the main telephone and fax number(s) of the local facility and an emergency or after hours telephone number(s) where someone representing the local facility can be reached.
5. Print the names of those persons authorized to represent the local facility and their titles. A primary and Secondary contact must be listed.
6. Print the name and title of the signatory authority for the local facility. Definitions of signatory authority can be found under Section H of the Industrial Wastewater Discharge Permit Application Form.
7. If the local facility has district or area office, list the complete mailing address, telephone number, fax number, and contact person at the district/area office.
8. If the local facility has corporate office, list the complete mailing address, telephone number, fax number, and contact person at the corporate office.
9. List the name of the top CEO responsible at the highest level of the company structure. Provide the complete mailing address, telephone, and fax numbers.
10. List all Standard Industrial Classification (SIC) Codes for this company or facility. If you have questions regarding SIC Codes, please contact the Environmental Assessment Department of Little Rock Wastewater for assistance.
11. Indicate environmental permits held by this company or facility (YES or NO). If yes, list the permit reference number. Environmental permits will include your Little Rock Wastewater Industrial Discharge Permit and may include permits issued by Arkansas Department of Environmental Quality and/or the U.S. Environmental Protection Agency (EPA) for air, water (National Pollutant Discharge Elimination System - NPDES), stormwater (NPDES), solid waste, hazardous waste (Resource Conservation and Recovery Act - RCRA), incinerators, or other environmental permits.

Section B - Water Use Information

1. List all Little Rock Municipal Water Works account numbers for this facility. These account numbers will be found on your monthly water and sewer bills.
2. Indicate whether all water used at this company or facility comes from Little Rock Municipal Water Works (YES or NO). If NO, please list the source(s) of additional water, such as wells, reservoirs, etc., and the average daily use from these sources.
3. Indicate whether all process water at this company or facility is discharged to the sanitary sewer (YES or NO). If NO, please indicate how the additional water is disposed of or used.
4. Indicate whether this facility receives a diversion credit for waters which are not discharged to sanitary sewer (YES or NO). If YES, you must list all meters by serial number, size, and average use in gallons per day. If you have any questions about diversions or diversion credits, please contact the Environmental Assessment Department at Little Rock Wastewater.

Section C - Facility Operating Characteristics

1. List the days and hours of normal operation of this company and facility, e.g. Monday - Friday, 8:00 a.m. - 4:30 p.m.
2. List the start times and stop times of each shift, the number of employees, and primary functions conducted during that shift.
3. Indicate whether production is subject to seasonal variation (YES or NO). If YES, describe the seasonal variation, listing months of high and/or low production.

Indicate any time(s) of the year when this company or facility is not in operation other than weekends or normal holidays (YES or NO). If YES, list the time(s) of the year as specifically as possible when this company or facility is shut down or otherwise not in operation.

Section D - Process Information

1. List all major products, and/or services provided by this company. Products include the end product of the manufacturing or fabrication processes. Services can include inspection, repair, etc.
2. List all processes conducted at this facility. Processes include the major steps involved in production of the end product. Review and complete Attachment 1 for identifying federal regulated processes.
3. List all raw materials used at this facility in the production processes.
4. List all sources of wastewater generation at this facility in regard to the process(es) listed in item #1.
5. Indicate whether any new processes have been added at this facility (YES or NO) since the last Industrial Wastewater Discharge Permit Application Form. If YES, explain.

Section E - Chemical Inventory Information

1. If this is a new application, provide a complete list of all chemicals used at the facility. Also, provide a copy of the manufacturer's MSDS, or (B) If you are renewing and existing discharge permit, indicate if there have been any changes to the facility chemical inventory since a previous permit application? (YES or NO) For both A and B above, cross reference the Material Safety Data Sheets (MSDS) of chemicals used at the applicant facility against the pollutant list on Attachment 2. If a pollutant on the list is contained in any of your process chemicals or is stored at the facility please indicate on the attachment and return with this application. Submit a copy of all MSDS or a complete chemical listing for chemicals used or stored at this facility if not previously submitted to Little Rock Wastewater.
2. Indicate (YES or NO) if the facility has a Spill Control Plan. If NO, submit a plan of action for procedures, policies, and mechanism, that controls and prevents spills or slug discharges from entering the sanitary sewer (City of Little Rock Ordinance 15,344, Article VI, Section 10).
3. Indicate any changes in the facility Spill Control Plan. If YES, explain and attach any pertinent information about the changes, such as diagrams, plans, etc.

Section F - Wastewater Treatment

1. Describe any wastewater treatment processes conducted at this facility prior to the discharge of the water to the sanitary sewer. Attach a copy of the most current plans and diagrams. If no treatment processes are conducted, indicate "not applicable". Review and complete the Attachment 3 check list of treatment processes.
2. If Industrial Wastewater Discharge Permit Application Form is for permit renewal indicate (YES or NO) whether any new treatment equipment has been added. If YES, explain and attach diagrams, plans, and other pertinent information on the new equipment.
3. Indicate whether any of the treatment processes listed in item #1 above (YES or NO) result in the generation of a solid waste. If YES, indicate how those solids are disposed.
4. List other policies or procedures used to prevent discharge of pollutants.
5. List all flow meters measuring wastewater flow and explain how the accuracy of these flow meter(s) is maintained.
6. Report the average monthly wastewater discharge to the sanitary sewer. Little Rock Water Works reports the water consumption to you in 100 cubic feet. There are 748 gallons per 100 cubic feet of water. If there are no diversions then water discharged will equal water consumption.

Section G - Freedom of Information

This section describes procedures to use if any of the information you submit to Little Rock Wastewater in respect to this Industrial Wastewater Discharge Permit Application Form. Some information may be considered trade secrets or proprietary information. If you believe that any of the information contained in your permit application should be considered confidential, please follow the instructions provided in the application under this section.

Section H - Certification and Signature

Section H of the Industrial Wastewater Discharge Permit Application Form lists three (3) categories of individuals who are considered authorized representatives. This Industrial Wastewater Discharge Permit Application Form must be signed by an authorized representative of the company or facility as defined by EPA Regulation 40 CFR 403. Any signature other than that of an authorized representative will cause this Industrial Wastewater Discharge Permit Application Form to be considered incomplete and may cause a delay in the issuance of the Industrial Wastewater Discharge Permit.

LITTLE ROCK WASTEWATER
ENVIRONMENTAL ASSESSMENT DIVISION
INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION FORM

CHECK ONE:

o Permit Renewal Application. Applicant currently holds a discharge permit issued by Little Rock Wastewater.

o New Industry Application. Applicant proposes to discharge industrial wastewater to the sanitary sewer or is currently discharging but does not hold a discharge permit.

Section A - General Facility Information

1. A. Company Name: _____

   B. Local Facility Name if Applicable: _____
   o Check here if No. 1-(B) is not applicable

2. Local Facility Mailing Address: _____

3. Location of Local Facility (if different from above): _____

4. Local Facility Telephone No.: _____ Fax No. _____

   Emergency or After Hours Telephone #(s): _____

5. Name and title of person(s) authorized to represent your firm or company in official capacity in dealings with Little Rock Wastewater (both primary and secondary contacts).

   Primary Contact: _____ Title: _____

   Secondary Contact: _____ Title: _____

6. Signatory Authority (see Section H of this application).

   Name: _____ Title: _____

7. If the local facility has district or area office, list the complete mailing address, telephone number, fax number, and contact person at the district/area office.
   o Check here if No. 7 is not applicable

   _____

   _____

   _____

8. If the local facility has corporate office, list the complete mailing address, telephone number, fax number, and contact person at the corporate office.
   o Check here if No. 8 is not applicable

   _____

   _____

   _____

9. Provide the name of top corporate, Chief Executive Officer. Provide the complete mailing address, telephone, and fax numbers.

10. List all Standard Industrial Classification Numbers (SIC Codes) for this facility:

11. List below all, if any, Environmental Permits currently held by the applicant facility. Name the issuing agency and list permit number(s):

A. Little Rock Wastewater Industrial Wastewater Discharge Permit #: o YES, o NO

B. Arkansas Department of Pollution Control and Ecology RCRA Permit #: o YES, o NO

C. Arkansas Department of Pollution Control and Ecology Stormwater Permit #: o YES, o NO

D. Arkansas Department of Pollution Control and Ecology Air Permit #: o YES, o NO

E. Arkansas Department of Pollution Control and Ecology Incinerator Permit #: o YES, o NO

F. Other Environmental Permits (if yes, list type of permit, issuing agency, and permit number):

Section B - Water Use Information

1. List all Little Rock Municipal Water Works Account Numbers for this facility:

2. Does all water used at this facility come from Little Rock Municipal Water Works? o YES, o NO

If NO, please list the source(s) of additional water and average daily usage:

3. Is all process water discharged to the sanitary sewer? o YES, o NO

If NO, how is the additional water used or disposed of (i.e., water into product, cooling tower evaporation, boiler makeup water, discharge to storm drain, etc.)?

_____

_____

4. Does this facility receive a diversion credit for waters that are not discharged to the sanitary sewer? o YES, o NO

If YES, list all meters below:

Serial #_____Size:_____Average Discharge or Use (gallons per day)_____

Serial #_____Size:_____Average Discharge or Use (gallons per day)_____

Serial #_____Size:_____Average Discharge or Use (gallons per day)_____

Serial #_____Size:_____Average Discharge or Use (gallons per day)_____

Section C - Facility Operating Characteristics

1. List the days and hours of normal operation for this facility: _____

2. List the times of each shift, the average number of employees per shift, and indicate whether the shift is primarily production, maintenance, cleanup, administrative, and/or other (please explain):

1st Shift Start Time: _____Stop Time:_____ Number of Employees:_____

Primary Function(s)_____

2nd Shift Start Time: _____Stop Time:_____ Number of Employees:_____

Primary Function(s)_____

3rd Shift Start Time:_____Stop Time:_____ Number of Employees:_____

Primary Function(s)_____

3. Is production subject to seasonal variation? o YES, o NO. If YES, describe:

_____

_____

4. Are there any times during the year (other than normal holidays or weekends) that this facility is not in operation? o YES, o NO. If YES, describe:

_____

_____

Section D - Process Information

1. List all major products, and/or services provided by this company or facility (attach additional sheets if necessary).

2. List and describe all processes conducted at this facility. Review Attachment 1 to this application and check any Federal categorical listed process (40 CFR 400 series) which are performed at this facility and return the attachment with this application.

3. List all raw materials used at this facility in the production process(es) (attach additional sheets if necessary):

4. List all major sources of wastewater generation at this company or facility related to the process(es) described in item #1 above (i.e., milk production - equipment and floor cleaning water, copper plating - alkaline and acid cleaning rinse water) (attach additional sheets if necessary):

5. Have any new production processes been added at this facility since the last application for a discharge permit? o YES, o NO. If YES, explain:

Section E - Chemical Inventory Information:

1. (A) If this is a new application, provide a complete list of all chemicals used at the facility. Also, provide a copy of the manufacturer's MSDS, or (B) If you are renewing and existing discharge permit, have there been any changes in this facility's chemical inventory since a previous permit application? o YES, o NO o N/A. For both A and B above, cross reference the Material Safety Data Sheets (MSDS) of chemicals used at the applicant facility against the pollutant list on Attachment 2. If a pollutant on the list is contained in any of your process chemicals or is stored at the facility please indicate on the attachment and return with this application. Submit a copy of all MSDS or a complete chemical listing for chemicals used or stored at this facility if not previously submitted to Little Rock Wastewater Utility.

2. Does this facility have a Spill Control Plan to submit with this application or has already submitted to the Utility? o YES o NO. If NO, submit a plan of action for addressing procedures, policies, mechanism, that controls and prevents spills or slugs discharges from entering the sanitary sewer. The City of Little Rock Ordinance 15,344, Article VI, Section 10, requires an approved "Spill Control Plan" before discharging to the sanitary sewer.

3. Have there been any changes to this facility's Spill Control Plan since the last permit application? o YES, o NO. If YES, please explain below and attach any revisions to your plan to this permit application.

Section F - Wastewater Treatment

1. Describe all wastewater treatment processes conducted at this facility prior to discharge to the sanitary sewer (attach additional sheets if necessary). Complete Attachment 3 of the application to check the pretreatment processes conducted at this facility:

2. Has any new wastewater treatment equipment, including sand traps, oil/water separators, grease traps, solids traps, or flow equalization equipment been added since the previous permit renewal application? o YES, o NO. If YES, explain and attach diagrams, plans, etc. to this renewal application.

3. Do any of the treatment processes utilized by this facility result in the generation of a solid waste? o YES, o NO. If YES, please indicate how these solids are disposed. For grease, sand, oil, and solids traps, list the cleaning frequency and person or company that removes the solids and/or oil.

_____

_____

_____

4. Describe pollution prevention policies or procedures utilized by your facility that controls discharges of pollutants into the sanitary sewer system:

_____

_____

_____

5. List all flow meters used to measure discharge of wastewater through and/or from treatment processes including total flow measurements.

Name and Model #_____Serial #_____Size:_____

Name and Model #_____Serial #_____Size:_____

Name and Model #_____Serial #_____Size:_____

6. Average monthly volume of wastewater discharge to the sanitary sewer_____

Section G - Freedom of Information

City of Little Rock Ordinance 15,344 and EPA Regulation 40 CFR 403 requires that the information contained in this application be available for public inspection without reservation. Exceptions are made for trade secrets or proprietary information. If any of the material contained in this application can be considered a trade secret or propriety business information, it must have the words **"CONFIDENTIAL BUSINESS INFORMATION"** on the applicable pages and the information must be submitted on separate pages. If the material can be considered confidential, it will be filed separately in a locking file cabinet. If the information cannot be considered confidential, notification will be given within ten (10) days of receipt stating the reason(s) the information cannot be held confidential.

Section H - Certification and Signature

This application is to be signed by an authorized official of the facility after completion of the permit application and review of the information contained in the application.

Authorized officials are defined by EPA Regulation 40 CFR 403 as follows:

1. A responsible corporate officer, if the facility is a corporation

   a. A president, secretary, treasurer, or vice-president of the corporation in charge of a principle business function, or any other person who performs similar policy- or decision-making functions for the corporation.

   b. The manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25

million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

2. A general partner or proprietor if the facility is a partnership or sole proprietorship respectively.

3. A duly authorized representative of the individuals listed in items 1 or 2 above if:

   a. The authorization has been made in writing by any of the individuals listed in items 1 or 2 above; and

   b. The authorization specifies either an individual or a position having responsibility for the overall operation of the facility, such as a plant manager, superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the facility; and

   c. The written authorization has been submitted to Little Rock Wastewater.

The authorized official of the facility shall make the following certification statement:

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 or imprisonment for knowing violations.

Attested By:

_____

Name and Title (Please Type or Print)

_____

Signature

_____

Date

For Little Rock Wastewater Office Use Only:

Permit Application Received by:_____ Date: _____

Initial Review Conducted by: _____ Date:_____
☐ Jeff Davis, Pretreatment Supervisor

Comments:_____

Facility Inspection Conducted by: _____ Date:_____
Industrial Inspector: ☐ Tony Roll, ☐ Allen Gatlin, ☐ Paul Foster

Comments:_____

Supervisor Review: _____ Date:_____
Mikel Murders

Comments:_____

Pretreatment Supervisor Review: _____ Date:_____
Jeff Davis

Comments:_____

A-2K

ATTACHMENT 1

If your facility employs or will be employing processes in any of the business activities below (regardless of whether they generate wastewater, waste sludge, or hazardous waste), place a check beside the category or business activity (check all that apply).

Industrial Categories*

o Aluminum Forming
o Asbestos Manufacturing
o Battery Manufacturing
o Builders Paper and board Mills
o Carbon Black Mfg.
o Coal Mining
o Coil Coating
o Copper Forming
o Electric and Electronic Components Mfg
o Electroplating
o Feedlots
o Fertilizer Manufacturing
o Foundries (Metal Molding and Casting)
o Glass Manufacturing
o Grain Mills
o Inorganic Chemicals
o Iron and Steel
o Leather Tanning and Finishing
o Metal Finishing
o Nonferrous Metals Forming
o Centralized Waste Treatment
o Nonferrous Metals Manufacturing
o Organic Chemicals Manufacturing
o Paint and Ink Formulating
o Paving and Roofing Manufacturing
o Pesticides Manufacturing
o Petroleum Refining
o Pharmaceutical
o Plastic and Synthetic Materials Manufacturing
o Plastics Processing Manufacturing
o Porcelain Enamel
o Pulp, Paper, and Fiberboard Manufacturing
o Rubber
o Soap and Detergent Manufacturing
o Steam Electric
o Sugar Processing
o Textile Mills
o Timber Products
o Transportation Equipment Cleaning
o Pesticide Formulating and Packaging
o Landfills

Other Category Guidelines Under Development
o Metal Products and Machinery
o Meat Products
o Industrial Container and Drum Cleaners

* A facility with processes inclusive to these categories may be subject to discharge pretreatment standards listed in the Code of Federal Regulations. If you are not sure if your process is regulated by a category listed above review the Code of Federal Regulations. Contact the Little Rock Wastewater Industrial Pretreatment Supervisor if further assistance is needed.

Describe below all processes at your facility that would be regulated under a category listed above:

_____

_____

_____

o Check here if none of the above categories apply to your facility

ATTACHMENT 2

By review of Material Data Safety Sheets and inventory of chemicals at your facility indicate by checking below those that are present at your facility.

o Acrolein
o Acrylonitrile
o Benzene
o Bromoform
o Carbon tetrachloride
o Chlorobenzene
o Chlorodibromomethane
o Chloroethane
o 2-Chloroethyl vinyl ether
o Chloroform
o Dichlorobromomethane
o 1, 1-Dichloroethane
o 1, 2-Dichloroethane
o 1, 1-Dichloroethylene
o 1, 2- Dichloropropane
o 1, 3 - Dichloropropylene
o Ethylbenzene
o Methyl bromide
o Methyl chloride
o Methylene chloride
o 1,1 ,2 ,2-Tetrachloroethane
o Tetrachloroethylene
o Toulene
o 1,2-trans-dichloroethylene
o 1, 1 ,1-Trichloroethane
o 1, 1, 2-Trichloroethane
o Trichloroethylene
o Vinyl chloride

o 2-Chlorophenol
o 2, 4-Dichlorophenol
o 2, 4-Dimethylphenol
o 4, 6-Dinitro-o-Cresol
o 2, 4-Dinitrophenol
o 2- Nitrophenol
o 4- Nitrophenol
o P-chloro-m-cresol
o Pentachlorophenol
o Phenol
o 2, 4, 6-Trichlorophenol

o Acenaphthene
o Acenaphthylene
o Anthracene
o Benzidene
o Benzo (a) anthracene
o Benzo (a) pyrene
o 3,4-Benzofluoranthene
o Benzo (ghi) perylene
o Benzo (k) fluroanthene
o Bis (2-Chloroethoxyl) methane
o Bis (2-Chloroethyl) ether
o Bis (2-Chloroisopropyl) ether
o Bis (2-Ethylhexyl) phthalate
o 4-Bromophenyl phenyl ether
o Butylbenzyl phthalate
o 2-Chloronaphthalene
o 2-Chlorophenyl phenyl ether
o Chrysene
o Dibenzo (a,h) anthracene
o 1, 2-Dichlorobenzene
o 1, 3-Dichlorobenzene
o 1, 4-Dichlorobenzene
o 3, 3-Dichlorobenzidene
o Diethyl phthalate
o Dimethyl phthalate
o Di-n-butyl phthalate
o 2, 4-Dinitrololuene
o 2, 6-Dinitrotoluene
o Di-n-octyl phthalate
o 1, 2-Diphenylhydrazine
o Fluoranthene
o Fluorene
o Hexachlorobenzene
o Hexachlorobutadiene
o Hexachlorocyclopentadiene
o Hexachloroethane
o Indeno (1, 2, 3-cd) pyrene
o Isophorone
o Naphthalene
o Nitrobenzene
o N-Nitrosodimethylamine
o N-Nitrosodi-n-propylamine
o N-Nitrosodiphenylamine
o Phenanthrene
o Pyrene
o 1, 2, 4-Trichlorobenzene

o Aldrin
o Alpha-BHC
o Beta-BCH
o Gamma-BHC
o Delta-BHC
o Chlorodane
o 4, 4-DDT
o 4, 4-DDE
o 4, 4-DDD
o Dieldrin
o Endosulfan-sulfate
o Endrin
o Endrin aldenhyde
o Heptachlor
o Heptachlor epoxide
o PCB-1242 (Arochlor 1242)
o PCB-1254 (Arochlor 1254)
o PCB-1221 (Arochlor 1221)
o PCB-1232 (Arochlor 1232)
o PCB-1248 (Arochlor 1248)
o PCB-1260 (Arochlor 1260)
o PCB-1016 (Arochlor 1016)
o Toxaphene

o Antimony
o Arsenic
o Beryllium
o Cadmium
o Chromium
o Copper
o Lead
o Mercury
o Nickel
o Selenium
o Silver
o Thallium
o Zinc
o Total Cyanides
o Total Phenols

o Chromium (Hexavalent)
o Radioactive nuclides
o Diazinon
o chlorpyrifos
o Xylenes

A-Zm

ATTACHMENT 3

Indicate below all treatment processes that are at your facility. Include diagrams and schematics if not previously submitted to Little Rock Wastewater.

- o Air Flotation
- o Centrifuge
- o Chemical precipitation
- o Chlorination
- o Cyclone
- o Filtration
- o Flow equalization
- o Grease or oil separation, type
- o Grease trap
- o Grinding filter
- o Grit removal
- o Ion exchange
- o Neutralization, pH correction
- o Ozonation
- o Reverse osmosis
- o Screen
- o Sedimentation
- o Septic tank
- o Solvent separation
- o Spill protection
- o Sump
- o Biological treatment, type:
- o Rainwater diversion or storage
- o Other chemical treatment, type: _____
- o Other physical treatment, type: _____
- o Other, type: _____

o There is no pretreatment conducted at this facility

Give details on controls and operations of pretreatment equipment used at your facility:

_____

_____

_____

_____

_____

_____

_____

_____

A-2N

Attachment A-3

LITTLE ROCK WASTEWATER UTILITY
INDUSTRIAL WASTEWATER DISCHARGE PERMIT FACT SHEET

Industry Name:	Waste Management Two Pine Landfill
Mailing Address:	100 Two Pine Dr. NLR, AR 72117
Facility Location:	100 Two Pine Dr.
Contact Person:	Scott Tarkington
Title:	Market Area Environmental Manager
Telephone Number:	(501) 982-7336
Emergency Number:	(501) 982-2606
Other Contact(s)	Wayne Mangum, District Manager
Signatory Authority:	David Conrad
Title:	WM- Director of Landfill Operations
Parent Company:	Waste Management, Inc.
CEO:	David Steiner
Mailing Address:	1001 Fannin Suite 4000 Houston, TX 77002
Telephone Number:	(713) 394-2106

Environmental Permits Held:

1. LRWU Industrial Wastewater Discharge Permit SP-L2
2. ADEQ Stormwater Permit ARG 160011
3. ADEQ RCRA 163-S1-R2
4. ADEQ Air Permit 1697-AOP-RO
5. Jacksonville Wastewater Utility Industrial Wastewater Discharge Permit 03-10-10

Waste Management of Arkansas Two Pine Landfill located at Two Pine Drive is a Class A landfill engaged in the acceptance, for compaction and disposal, of non-hazardous industrial, commercial and residential solid wastes from the central Arkansas area. No hazardous wastes are accepted on site and all loads entering the landfill are visually inspected.

Industrial wastewater generation at the facility includes discharges from the collection of landfill leachate that accumulates in leachate monitoring wells located around the perimeter of the facility. Leachate is generated from surface water run-on and decomposition of waste materials. The landfill operates three leachate collection tanks operating in parallel with a total capacity of 65,000 gallons. One outfall valve for all collection tanks is used for loading tanker trucks.

Two Pine Landfill is classified by Little Rock Wastewater Utility as a special industrial user that trucks landfill leachate, to the Adams Field Liquid Waste Disposal Station, for disposal into the treatment plant headworks.

Two Pine Landfill is located off Hwy 67/167 at the Kiehl Exit and transports process wastewater (landfill leachate) to the Little Rock Wastewater Adams Field Treatment Plant Hauled Waste Disposal Station for disposal. The transport is by 6,000 gallon tanker loads. The transporter must obtain a Landfill Leachate Hauler Permit and use the LRWU manifest system to enable the Utility to track and monitor loads received at the Adams Field Wastewater Treatment Plant. This permit requires notification from Two Pine Landfill to LRWU 48 hours prior to bringing any landfill leachate to the Adams Field Wastewater Treatment Plant Hauled Waste Disposal Station.

The above information on the discharges to the Adams Field Treatment Plant headworks from the above listed facility is presented to demonstrate the need for prompt reporting of spills, slug loads, or violations of discharge limits as addressed in Part II. Section D. of this permit. Failure to promptly report spills, slug loads, or effluent violations as required by the permit will result in the Utility seeking enforcement action against the facility.

The information included in this fact sheet has been obtained from the industrial users' permit renewal application, historical data, Little Rock Wastewater Utility data, and information taken during inspections. This information has been used in preparing the attached industrial discharge permit for the facility listed above.

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LITTLE ROCK WASTEWATER UTILITY
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NUMBER: SP-L2

AUTHORIZATION TO DISCHARGE INDUSTRIAL PROCESS FLOW TO THE CITY OF LITTLE ROCK WASTEWATER UTILITY

In accordance with the provisions of City of Little Rock's General Ordinance 17,965, Little Rock Pretreatment Ordinance 17,966, Environmental Protection Agency Regulation 40 CFR 403 (General Pretreatment Regulations), and any applicable provisions of Federal or State of Arkansas Law, the following facility,

Waste Management of Arkansas, Inc.
Two Pine Landfill
100 Two Pine Drive
North Little Rock, AR 72117

is authorized to transport industrial wastewater to the City of Little Rock Adams Field Wastewater Treatment Plant for disposal as described below:

Landfill leachate collected in designated storage tanks is pumped into transport tankers in 6,000 gallon quantities. The leachate is hauled to the Adams Field Wastewater Treatment Plant and disposed to the treatment plant headworks at a location approved and monitored by the treatment plant operation.

All discharges must be in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, III, and Attachment 1 hereof.

This permit is granted in accordance with the application filed on September 8, 2006 with the Environmental Assessment Division of Little Rock Wastewater Utility, and in conformity with plans, specifications, and/or other data submitted in support of the application.

This permit shall become effective on November 1, 2006. This permit and the authorization to discharge shall expire on midnight, October 31, 2008.

Signed this 31st day of October, 2006

Stanley B. Suel, Director
Environmental Assessment Division
Little Rock Wastewater Utility

A-3c

PART I
PERMIT REQUIREMENTS

SECTION A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS: HAULED LIQUID WASTE - Landfill Leachate. Sampling shall be conducted from the holding tanks using a method that will provide a sample representative of the holding tank contents and as described in Section C of this Part. Sampling is conducted as listed in the monitoring requirements below.

During the period beginning on the effective date of this permit and lasting through the date of expiration, the Permittee is authorized to discharge landfill leachate as a hauled liquid waste at the Adams Field Wastewater Treatment Plant, when all fees are paid for by the Landfill and the Leachate Hauler. Samples taken in compliance with the monitoring requirements specified below shall be taken at the Leachate Collection Tanks discharge valve that is used for tanker loading. Such discharge shall be limited and monitored by the Permittee as specified below (see notes 1, 2, and 3 below):

	Discharge Limitations		Monitoring Requirements	
Effluent Characteristics	**Monthly Average**	**Daily Max**	**Measurement Frequency[4]**	**Sample Type**
Arsenic (Total)	0.14 mg/L	0.14 mg/L	Two Per Year	Grab
Barium (Total)	Not Applicable	Report Only	Two Per Year	Grab
Boron (Total)	Not Applicable	Report Only	Two Per Year	Grab
Cadmium (Total)	0.2 mg/L	0.4 mg/L	Two Per Year	Grab
Chromium (Total)	5.0 mg/L	5.0 mg/L	Two Per Year	Grab
Copper (Total)	5.0 mg/L	5.0 mg/L	Two Per Year	Grab
Lead (Total)	1.3 mg/L	2.6 mg/L	Two Per Year	Grab
Manganese (Total)	Not Applicable	Report Only	Two Per Year	Grab
Mercury (Total)	0.002 mg/L	0.002 mg/L	Two Per Year	Grab
Nickel (Total)	4.9 mg/L	5.0 mg/L	Two Per Year	Grab
Selenium (Total)	0.1 mg/L	0.1 mg/L	Two Per Year	Grab
Silver (Total)	2.0 mg/L	4.0 mg/L	Two Per Year	Grab
Zinc (Total)	4.8 mg/L	5.0 mg/L	Two Per Year	Grab
Cyanide (Total)	1.8 mg/L	3.6 mg/L	Two Per Year	Grab

A-3of

Effluent Characteristics	Discharge Limitations: Monthly Average	Discharge Limitations: Daily Max	Monitoring Requirements: Measurement Frequency[4]	Monitoring Requirements: Sample Type
Molybdenum (Total)	Not Applicable	Report Only	Two Per Year	Grab
Biochemical Oxygen Demand	Not Applicable	Report Only	Two Per Year	Grab
Total Suspended Solids	Not Applicable	Report Only	Two Per Year	Grab
Ammonia Nitrogen, as Nitrogen	Not Applicable	Report Only	Two Per Year	Grab
pH		≥5.0 S.U. and ≤12.0 S.U.	Two Per Year	Grab
Organic Toxic Pollutants (40 CFR 122, Appendix D, Table II) Volatiles and Pesticides only. (See note 4).	Not Applicable	Report Only	Two Per Year	Grab
Additional Convention and Non-conventional Pollutants (40 CFR 122, Appendix D, Table IV) Oil and Grease	Not Applicable	Report Only	Two Per Year	Grab
TCLP (40 CFR 261, Table I)	Not Applicable	less than regulatory levels listed in 40 CFR 261, Table I	Two Per Year	Grab

A-3e

Notes:
1. All sampling and analysis conducted to fulfill the requirements under this section shall be conducted during normal work cycles.
2. All samples analyzed to fulfill the requirements must be performed in accordance with the latest approved method listed in 40 CFR, Part 136. If performed by an outside laboratory (or contract laboratory) shall be performed by a laboratory certified for that analysis by the Arkansas Department of Environmental Quality in accordance with the latest approved methods in 40 CFR Part 136. If an approved method is not contained in 40 CFR Part 136, contact Little Rock Wastewater Utility (LRWU) for method selection guidance.
3. See Section C for sample collection instructions.
4. Sampling must be conducted 2/year in appropriate bottles. The first samples must be collected in the first half of the year ending in June and the second sample event must be collected during the second half of the year by the end of December.
5. All analytical test results must be reported at or above the method detection limit.
6. Prior to bringing landfill leachate loads to the POTW by tanker truck, LRWU must be notified 48 hours in advance.

SECTION B. SCHEDULE OF COMPLIANCE

The Permittee shall achieve compliance with the effluent limitations specified in Section I.A. of this permit in accordance to the following schedule.

Compliance with effluent limitations is required on the effective date of the permit.

SECTION C - SAMPLE COLLECTION REQUIREMENTS

Samples should be collected from the hold tank discharge valve used to load tanker trucks hauling leachate to the POTW. Samples collected should be thoroughly mixed before transferred to the individual sample containers and preserved according to test parameter in accordance with the latest approved methods in 40 CFR Part 136.

Little Rock Wastewater

HAULED LIQUID WASTE MANIFEST

COPY

No. 20065

GENERATOR INFORMATION

Generator Name (Please Print):			Address:	
Contact Person:			City: AR Zip Code	
Daytime Telephone No. (Include Area Code):			County:	
Home Telephone No. (Include Area Code):			Tank Capacity: gallons	
Waste Removed From:		One Family Residential Septic Tank		Landfill Leachate**
		Commercial Holding/Septic Tank*		WAS/Aerobic Sludge*
		Portable Toilet/Chemical Toilet*		Other*

If Other, Please Describe Type and Source:

* Generators are required to have prior approval by Little Rock Wastewater (LRW) before disposal is accepted.

** The Landfill Leachate Generator must be permitted under the LRW Pretreatment Program.

As representative for the generator of this waste, I certify that the information provided above is true and correct and contains no industrial waste. I am aware that falsification of this information may result in revocation of disposal privileges and/or criminal prosecution

Date and Time of Service:

Generator Signature / Date:

TRANSPORTER INFORMATION

Transporter Name:	Address:
Driver's Name (Please Print):	City: AR Zip Code
Telephone No. (Include Area Code):	
Vehicle No.: License No./Expiration Date: /	
Truck Tank Size: gallons	

I certify that the information provided above is true and correct, and contains no industrial waste. I am aware that falsification of this information may result in revocation of disposal privileges and/or criminal prosecution.

Date and Time Waste Transported:

Driver' s Signature / Date:

DISPOSAL INFORMATION

Business Name: Little Rock Wastewater - Adams Field Treatment Plant Disposal Station

Address: 1001 Temple Street, Little Rock AR 72202 Telephone No. (501)688-1525

Gallons Accepted from Transporter: gallons (Enter Truck Tank Size)

Received Date / Time:

Operator's Signature / Date:

Operator's Printed Name:

Comments Regarding Discharge:

Rev. 05/21/07 IPP-22

WHITE - GENERATOR CANARY - TRANSPORTOR PINK - DISPOSAL

A-32

COPY

POLICY FOR ACCEPTING PETROLEUM CONTAMINATED WATERS TO THE SANITARY SEWER

The purpose of this policy is to set forth guidelines to be used by Little Rock Wastewater Utility (LRWU) in accepting gasoline or diesel-contaminated waters from underground storage tanks (UST), contaminated rainwater surrounding those tanks, and groundwater from site remediation. LRWU will only accept those waters from locations within Little Rock City limits or the LRWU service area provided the criteria listed below are met.

A. Short Term UST Projects

Short term UST projects are defined as those projects which remediate water which is contaminated with materials such as but are not limited to gasoline and/or diesel fuel. The duration of the project shall last no more than a period of one (1) week and generate 4,999 gallons or less water for disposal.

1. The Utility will require a flash point test and a one time BTEX analysis for gasoline contaminated waters and a one time naphthalene analysis for diesel-contaminated waters. Samples shall be collected in such a way to assure the results of the testing are representative of the true level of contamination.

2. Contaminated waters may only be disposed of by transporting to the Adams Field Liquid Disposal Station. Connections to the sanitary sewer will not be approved for remediation of gasoline contaminated water. Payment in advance is required.

3. In no instance will the Utility accept contaminated waters at LRWU's Adams Field Liquid Waste Disposal Station with BTEX or naphthalene levels over 100 µg/L.

4. A site inspection must be performed by LRWU's Inspectors and results of testing must be submitted before any waters will be allowed transported to the Adams Field Liquid Waste Disposal Station.

5. The charge for disposal of contaminated waters will be $.0.20/gallon and the volume of water will be determined by the size of the tanker used to transport the water, e.g., if a tanker capacity is rated for 1,000 gallon, then the cost would be 1,000 x $0.20.

6. All short term UST projects must comply with the provisions set forth in the City of Little Rock's Pretreatment Ordinance #17,966 and General Ordinance #17,965.

B. Medium Term UST Projects

Medium term UST projects are defined as those projects which remediate water which is contaminated with materials such as but are not limited to gasoline and/or diesel fuel. The duration of the project shall be greater than one (1) week but no longer than one (1) month and generate 5000 gallons or more water for disposal.

1. The minimum testing requirement will be weekly for flash point, BTEX and/or naphthalene. The Utility may also require a Total Toxic Organic scan or other analysis on the contaminated waters. Determination of the TTO scan requirement will be based upon an on-site inspection. Samples shall be collected in such a way to assure the results of testing are representative of the level of contamination.

2. Contaminated waters may only be disposed of by transporting to the Adams Field Liquid Disposal Station. Connections to the sanitary sewer will not be approved for remediation of gasoline contaminated water. Payment in advance is required.

3. In no instance will the Utility accept contaminated waters at our Adams Field Disposal Station with BTEX or naphthalene levels over 20 µg/L. Pretreatment may be necessary to achieve the 20 µg/L limit.

4. A site inspection must be performed by LRWU's Inspectors and results of testing must be submitted before any waters will be allowed transported to the Adams Field Liquid Waste Disposal Station.

5. The charge for disposal of contaminated waters will be $.0.20/gallon and the volume of water will be determined by the size of the tanker used to transport the water, e.g., if a tanker capacity is rated for 1,000 gallon, then the cost would be 1,000 x $0.20.

6. All medium term UST projects must comply with the provisions set forth in the City of Little Rock's Pretreatment Ordinance #17,966 and General Ordinance #17,965.

C. Long Term UST Projects

Long term UST projects are defined as those projects which remediate water which is contaminated with materials such as but are not limited to gasoline and/or diesel fuel. The duration of the project shall be greater than one (1) month and generate 5000 gallons or more water for disposal.

1. Initial testing of untreated groundwater shall be performed to develop a baseline monitoring report for pollutants of concern and will include the following parameters:

- Organic compounds listed in 40 Code of Federal Regulation (CFR) Part 122 Appendix D Table II - Volatiles, Base/Neutrals, Acid Compounds, and Pesticides;
- The elements and compounds listed in 40 CFR Part 122 Appendix D Table III;
- Oil and grease, flashpoint, pH, benzene, toluene, ethylbenzene and xylene (BTEX). (Benzene, toluene, and ethylbenzene are included in the list of volatile compounds from 40 CFR Part 122 Appendix D Table II, they need not be analyzed twice in one event but shall be used to calculate a total BTEX concentration along with independent reporting of the compound);
- Representative samples must be collected and above analysis performed using EPA methods required by 40 CFR Part 136.

2. A summary shall be provided regarding the UST project to include the following:
   - When and how the groundwater became contaminated and with what;
   - Any federal, state, or local actions that have been undertaken or are currently pending;
   - Copies of letters, memorandum, permits, and compliance/noncompliance records;
   - Current method of treatment being used;

3. A copy of the existing or proposed construction plans of the pretreatment system, how it is to be performed and by who;
   - A Professional Engineer registered by the State of Arkansas must evaluate the pretreatment devices planned or currently in place. A report, certified by the engineer, must state whether the pretreatment devices currently in place or planned are adequate to comply with the 443 Subpart C New Source Pretreatment Standards, and Ordinance 17,966 requirements, including local limits.

4. The UST Project shall complete a Special Discharge Permit Application and return to LRWU. LRWU may issue a Special Discharge Permit, (Permit) for long term UST projects. This Permit will shall contain self monitoring requirements with discharge limits. The limits contained in the Permit will be determined based on the data provided in Items #1 through 3 of this section.

5. Contaminated waters may only be disposed of by transporting to the Adams Field Liquid Disposal Station. In no instance will the Utility accept contaminated waters at our Adams Field Disposal Station with BTEX or naphthalene levels over 20 µg/L. Payment in advance is required.

5. A site inspection must be performed by LRWU's Inspectors and results of testing must be submitted before any waters will be allowed transported to the Adams Field Liquid Waste Disposal Station.

7. The charge for disposal of contaminated waters will be $.0.20/gallon and the volume of water will be determined by the size of the tanker used to transport the water, e.g., if a tanker capacity is rated for 1,000 gallon, then the cost would be 1,000 x $0.20.

8. All long term UST projects must comply with the provisions set forth in the City of Little Rock's Pretreatment Ordinance #17,966 and General Ordinance #17,965.

The above policy is tentative and may be modified at any time without notice, for any reason to protect the interests of Little Rock Wastewater Utility. If you have any questions or would like to contact the Utility about a site inspection prior to disposal, please contact the Pretreatment Coordinator at (501) 688-1547 or 688-1532.

Attachment A-4

Pollution Prevention Award
10th Anniversary

COPY

Little Rock Wastewater

Pollution Prevention (P2) Award Application

Company Name:	Dassault Falcon Jet – Little Rock
Mailing Address:	PO Box 967, Little Rock, AR 72203
Facility Location:	3801 E. Tenth St./Adams Field
Primary Contact:	Peter Christiansen/Eugene Jamison
Telephone No.	210-0147 **Fax No.** 210-0478
No. of Employees:	2,000

Select the Award Category(s) that apply to your facility.

Award Categories for 2007

- ☐ Food Processing
- ☒ Manufacturing
- ☐ Healthcare
- ☐ General Service
- ☐ Small Business – (Less than 50 Employees)

(Small businesses may apply in both the applicable category and as a small business.)

- ☒ Ten Years of Pollution Prevention Progress

(Include with your application a detailed account of your facilities activities and successes over the past 10 years in pollution prevention.)

Enclose a narrative (photos, policies, graphs or other items may be included) for each question below describing all activities/policies used by your facility to avoid, eliminate, or reduce pollution at the source:

1. List all areas (air, solids, water and energy) where your facility practices pollution prevention.
2. Describe equipment and process modifications used at your facility to accomplish pollution prevention.
3. Describe environmental benefits gained by implemented pollution prevention practices.
4. Describe financial benefits and savings from implementing a pollution prevention program.
5. Describe how your program or activity can serve as a model for other like industries.

Return this application and narratives by **August 1, 2007** to:

Little Rock Wastewater
ATTN: Jeff Davis
Pretreatment Supervisor
1001 Temple Street
Little Rock, AR 72202

July 30, 2007

LITTLE ROCK WASTEWATER UTILITY
TENTH ANNIVERSARY
2007 POLLUTION PREVENTION AWARD APPLICATION

For

DASSAULT FALCON JET – LITTLE ROCK

Introduction

Pollution prevention is an integral part of Dassault Falcon Jet – Little Rock planning and operations. Our corporate policy states that we will preserve the environment by minimizing waste, complying with regulations, and improving environmental performance consistent with our product and services. The facility has been recognized for a history of compliance and quantifiable achievement, as well as future commitment. This is the basis of annual certification to ISO 14001 environmental standards, (International Standards Organization), and membership in the EPA Performance Track organization. Integral to this process, Senior Management convenes annually with the Environmental group to review facility performance and to consider/approve environmental goals for the coming year.

It should be noted that the Little Rock Wastewater Utility has been a constant "partner" in this effort. Dassault Falcon and the Utility have a long and cooperative history. Utility personnel have been a consistent and credible source of timely information and support for the Little Rock facility – not for ten, but thirty plus years of continuous growth. We have experienced substantial new developments and changes in operations, the regulatory environment, and related programs and systems evolution.

Our application focuses on Dassault Falcon's environmental projects for the current year and a condensed history of the ten year period 1997 - 2007. This correlates with the coverage period for the Utility/City P2 Tenth Anniversary.

1. **List all areas (air, solids, water and energy) where your facility practices pollution prevention.**

   Environmental program pollution prevention aspects:
   - Air
   - Water (potable, wastewater, storm water)
   - Solid Waste (non-regulated, regulated, hazardous)
   - Energy
   - Noise

2. **Describe equipment and process modification used at your facility to accomplish pollution prevention.**

   The following is a partial listing of a few of the more significant equipment and process modifications accomplished sequentially during the ten year period ending 2007.
   - Outsourced printed circuit board fabrication thereby eliminating resultant formaldehyde, lead, and heavy metals releases and associated employee exposure.
   - Upgraded wastewater pre-treatment system from batch/ultra-filter to flow-through polymer assisted clarifier with air-stripper and filter press to better address compliance and the evolution of chemical and physical changes in regulated wastewater.
   - Designed, constructed, and employed a self-closing lid to address volatiles emissions associated with waste rags at satellite collection points and subject to RCRA subpart CC.

- Replaced clay based absorbent materials with a corn-cob based material. New absorbent is more efficient and cost effective. Material combines inherent BTU value and improved range of absorbency. Eliminated landfill disposal for fuel blending/incineration.
- Conducted detailed review of individual wastewater sources resulting in substantial reductions in water usage and regulated water pre-treatment. 1) Paint waterfall controls were upgraded and placed on preventative maintenance schedule; 2) Training of Paint personnel was conducted emphasizing the unnecessary use of water when not in immediate use; 3) Heat treat monitoring and control devices were upgraded. Total estimated water reduction, potable and subsequent pre-treatment: 120,000 gallons annually.
- Initiated on-site computer-match of urethane aircraft paints. Project improved acquisition time, service, and reduced volume of paint and resultant residual waste by an estimated 25 percent.
- Expanded facility New Product Review program to include enhanced Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) controls. All proposed new materials are reviewed and approved by Environmental, Safety, and Engineering prior to acquisition. Additional emphasis on securing the most accurate air pollutant data and impact on facility emissions was added.
- Electrostatic paint equipment was acquired to replace typical air-spray application methods for paint primer. Electrostatic application is more efficient and resulted in an actual materials reduction of 30 percent with a corresponding reduction in associated air emissions and hazardous waste.
- Replaced the primary polymer utilized in wastewater pre-treatment. A single solid anionic polymer replaced the two previous liquids resulting in improved removal of water contaminants, a $22,000 annual polymer cost savings, and a 90 percent reduction in the volume of pre-treatment sludge.
- Initiated a "de-watering" process to minimize the water volume in waste hazardous paint generated in scheduled Paint Bay Maintenance. Process resulted in a hazardous waste reduction of approximately 175 gallons per bay or 83 percent.
- Initiated program for the centralized collection and re-cycling of cardboard related to Shipping/Receiving operations. Project was subsequently expanded to include computer paper and paper from various administrative areas.
- Replaced "flow-through" cooling employed in the Plating Clear-cote system with a re-circulating chiller unit. Potable water usage and resultant pre-treatment was reduced by an average 3,000 gallons per day. (Have since eliminated this entire operation)
- Replaced "flow-through" cooling of Heat Treat quench tank with a closed-loop refrigerated water system. System improved temperature control and reduced potable water usage and resultant pre-treatment volume by an average 1,700 gallons per day.
- Installed portable and/or permanent secondary containment for all satellite waste collection areas. Enumerated/identified areas and posted HazMat direct line call number.
- Installed upgraded redundant leak detection system (technologies) in the form of Automatic Guaging (ATG) and Interstitial tank monitoring in underground fuel storage tanks. These state-of-the-art systems further enhance the double wall fiberglass tanks and above ground piping previously installed to address state and federal standards.
- Replaced one solvent based parts washer system with environmentally friendly CO2 "cleaning" system. System "waste" is non-regulated dirt and/or grease and totally eliminated the waste solvent or liquid previously employed.
- Transitioned entire facility from standard fluorescent bulbs to low/no mercury environmentally friendly bulbs.
- Accomplished transition from solvent paints (haz) part cleaner systems (non-CO2) to a service based system in which spent solvent is reclaimed for use in the manufacture of roofing materials. Disposal as a hazardous waste was eliminated.
- Eliminated facility use of 1,1,1 Trichloroethane, a highly regulated VOC/HAP. Technology limitations previously required 1,1,1 for oxygen line cleaning. New technology system acquired.

- Paint operations replaced existing stripper with an equally effective stripper that further reduced VOC and HAP air emissions.
- Gained engineering approval and substituted Acetone for Methyl Propyl Ketone in multiple production processes. VOC and HAP air emissions were reduced proportionately and solvent cost savings realized.
- Constructed multiple new paint hangars employing dry filters. Work was transitioned to these from the "wet" bays. Energy, potable water, and water pre-treatment reductions were achieved. Water usage and pre-treatment volume were reduced an estimated 450,000 gallons annually based on current production levels.
- Coordinated with facility Treatment, Storage, Disposal Facility (TSDF) to weigh, re-cycle, and have steel from hazardous waste shipping drums documented.
- Initiate battery re-cycling programs for Aircraft, automotive/equipment, and small equipment/production batteries. Disposal of regulated (electronic) waste is reduced by this amount on an ongoing basis
- Initiated collection and re-cycle program to address significant volume of scrapped PC and CATIA units thereby eliminating applicable electronic/solid waste disposal.
- Installed custom application and curing system for cabinetry ultra-violet coatings. Project provides an improved and consistent finish, as well as materials reduction of approximately 15 percent.
- Accomplished concrete re-work and installed chemical resistant liner in Plating collection and drainage network. Project minimizes potential exposure to ground contamination attributable to long term exposure/deterioration of concrete to caustic chemicals.
- Accomplished outright substitution of Methyl Ethyl Ketone for Methyl Propyl Ketone. This substitution positively impacted the facility's single largest bulk solvent usage and reduces VOC and HAP air emissions while achieving cost savings. Recent EPA determinations made this change possible.
- Eliminated cyanide from two of four Plating operations via chemical/process change. Further pursuing elimination of cyanide from the final two. Reduces toxicity of hazardous waste and employee exposure.
- Replaced chemical treatment-settling based continuous flow wastewater pre-treatment system with an evaporator based system. Continued success in the reduction of regulated wastewater generated made evaporation and zero discharge physically feasible, financially competitive, and eliminated regulatory compliance concerns relating to federally regulated metal finishing discharge limits, especially for cadmium.
- Substituted "Pre-Cote" for Alodine as aircraft surface preparation for new 7X aircraft and related paint systems. A phasing-in to additional product line is planned. This substitution eliminates the chromium compounds and ferrous-cyanide associated with Alodine.
- Initiated utilization of new chromate free primers and reduced chrome high solids paint systems. These new paint systems are designed for high performance, as well as providing improved application and a reduction in environmental contaminants.

3. **Describe environmental benefits gained by implemented pollution prevention practices.**

Reductions in the volume of environmental contaminants are the best measure of program success. A brief overview and graphic representation of performance within major categories of environmental concern follows.

Please note that this documentation relates specifically to the ten year period ending 2007. A significantly greater proportion of reductions were achieved prior to 1997. Continuing improvement typically becomes more difficult as programs mature. In addition, this period includes the facility's physical performance against multiple new environmental regulations plus the addition of production operations reflected in emissions reporting during this period. Despite these issues, quantifiable improvements have been achieved in each sector.

Air

VOC emissions, 1997: 1.7 tons per aircraft
VOC emissions, 2006: 1.0 tons per aircraft
Volatile Organic Compound emissions were reduced by (41) percent per aircraft.

HAP emissions, 1997: .45 tons per aircraft
HAP emissions, 2006: .19 tons per aircraft
Hazardous Air Pollutant emissions were reduced by (237) percent per aircraft.

Hazardous Waste

Hazardous Waste, 1997: 2,760 pounds per aircraft
Hazardous Waste, 2006: 1,663 pounds per aircraft*
Hazardous Waste emissions were reduced by (40) percent per aircraft.

**This category now includes the electronic and various "regulated" waste categories that did not exist in 1997.*

Water

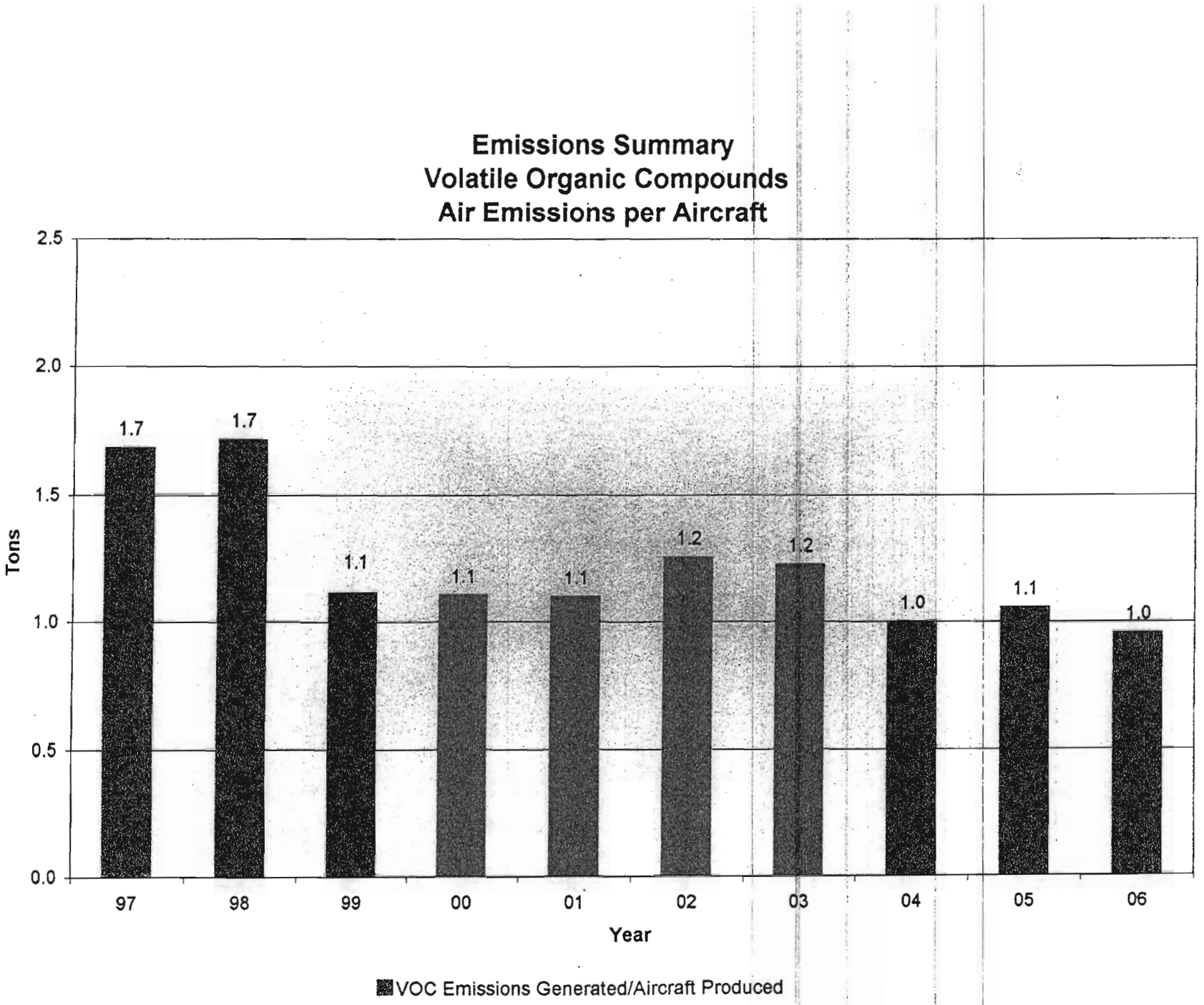
Regulated Water, 1997: 27,486 gallons per aircraft
Regulated Water: 2006: 6,535 gallons per aircraft
Regulated Water emissions were reduced by (421) percent per aircraft.

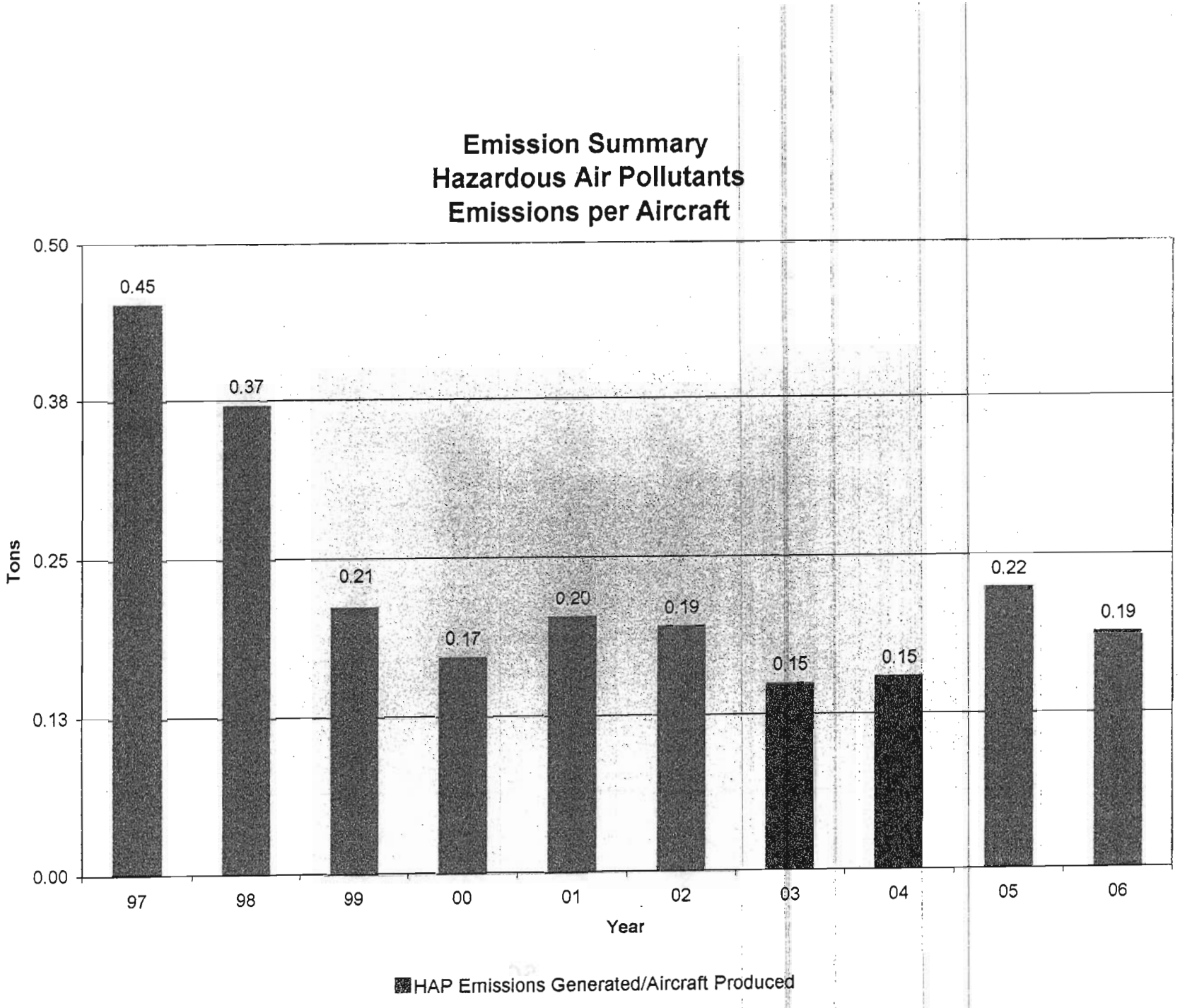
Our other aspects, energy and noise, are not easily quantified. This is particularly true due to continuous facility and operational expansion. However, each is considered as an element of our environmental assessment process which is a pre-requisite to approval of each new capital project.

Graphs

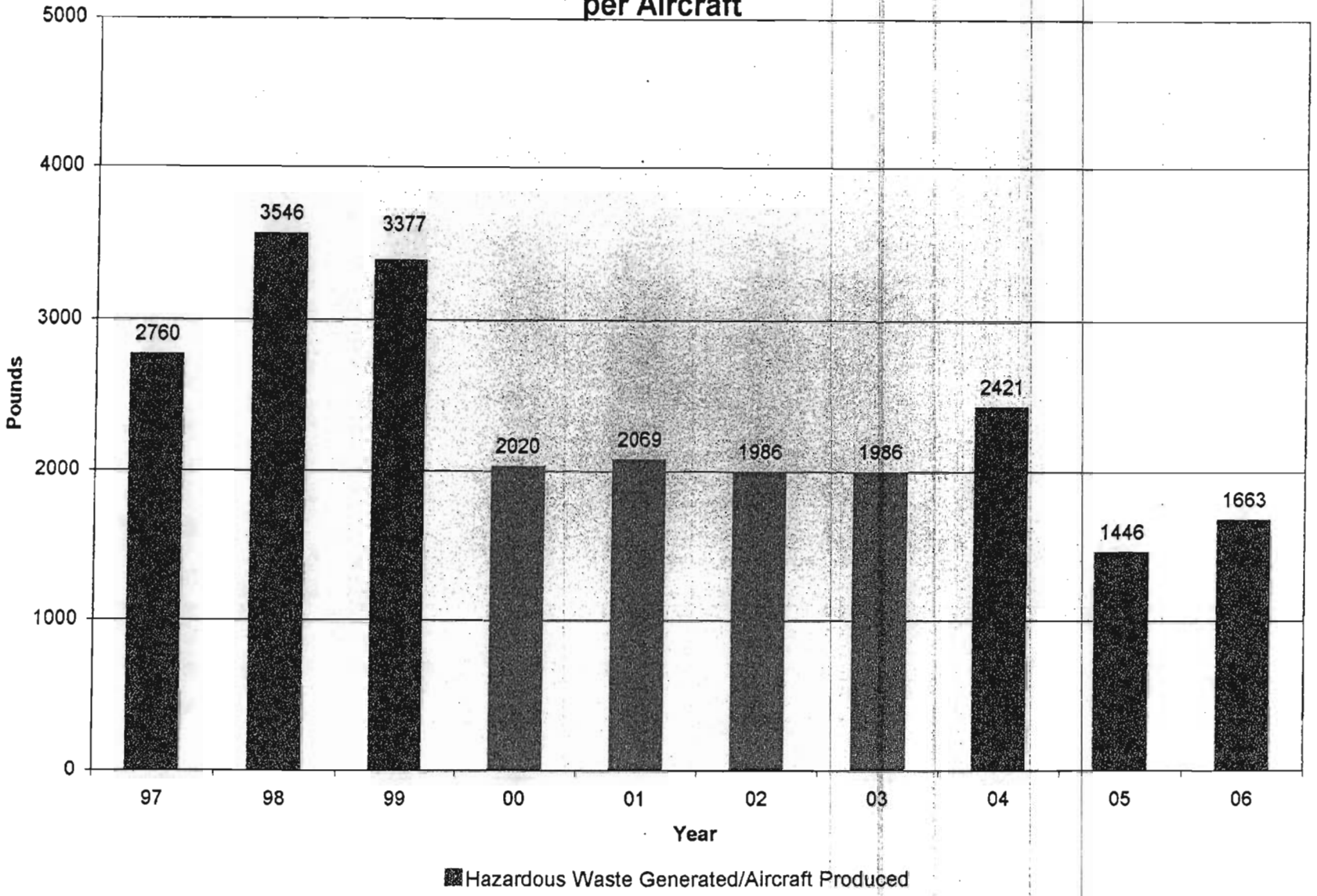
The graphs on the following pages reflect actual annual emissions and are therefore an indication of environmental performance.

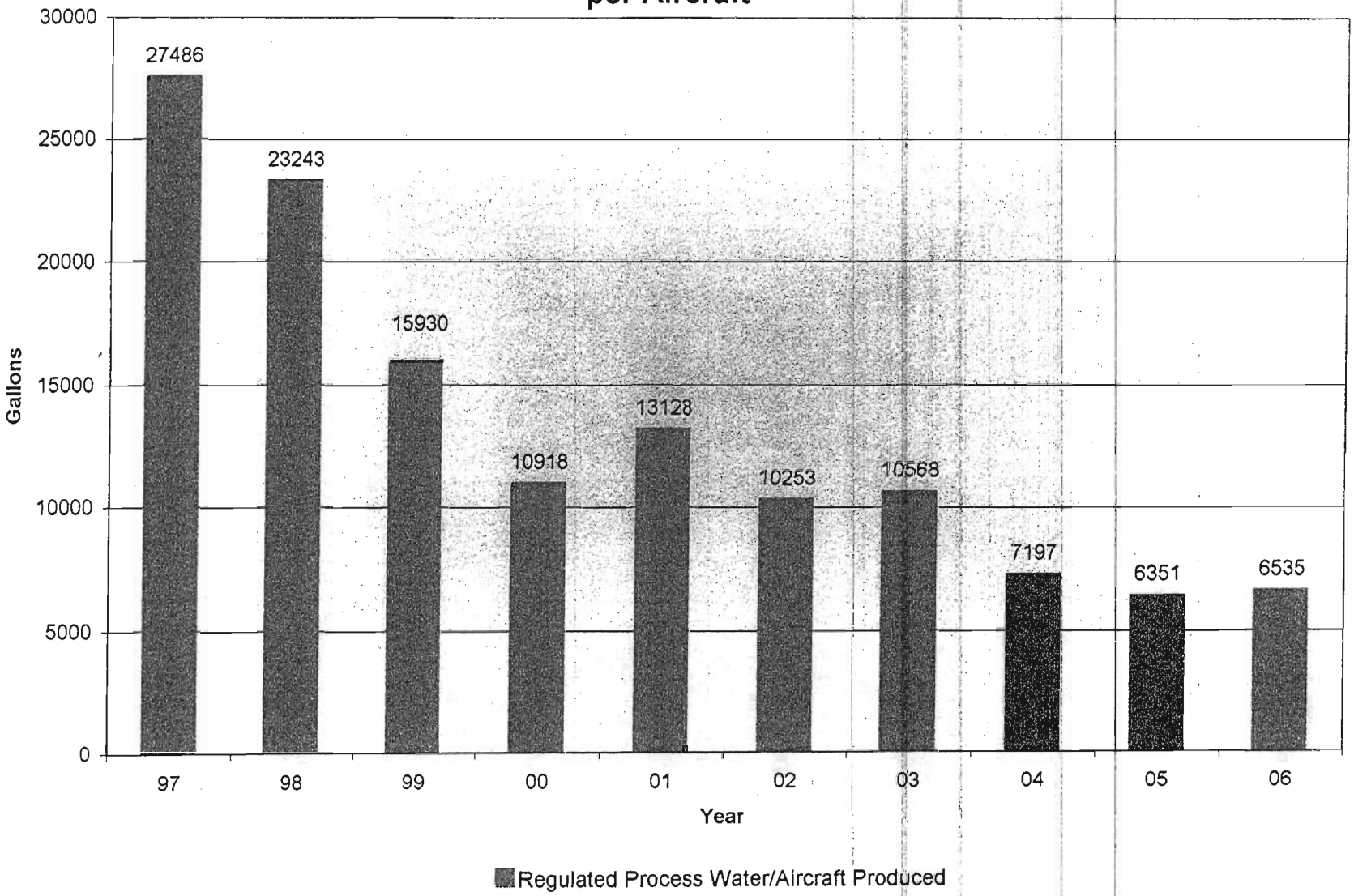
Again, note that during the referenced ten year period numerous changes that directly impacted Dassault Falcon environmental performance were initiated. For example, new regulations including RCRA sub-part CC and electronic waste were promulgated and the list of air contaminants was expanded. This resulted in a substantial increase in the volume of regulated materials/operations. In addition, multiple new production operations were implemented or expanded and the facility doubled in size from approximately 340,000 to 700,000 square feet. Despite these increases in production, regulated operations, and regulated materials and waste, the facility has been successful in reducing per aircraft emissions across the board.


Emissions Summary
Volatile Organic Compounds
Air Emissions per Aircraft
Tons
2.5
2.0
1.5
1.0
0.5
0.0
1.7
1.7
1.1
1.1
1.1
1.2
1.2
1.0
1.1
1.0
97
98
99
00
01
02
03
04
05
06
Year
VOC Emissions Generated/Aircraft Produced


Emission Summary
Hazardous Air Pollutants
Emissions per Aircraft
0.50
0.38
0.25
0.13
0.00
Tons
0.45
0.37
0.21
0.17
0.20
0.19
0.15
0.15
0.22
0.19
97
98
99
00
01
02
03
04
05
06
Year
HAP Emissions Generated/Aircraft Produced

A-43


Summary
Hazardous Waste Generated
per Aircraft
5000
4000
3000
2000
1000
0
Pounds
2760
3546
3377
2020
2069
1986
1986
2421
1446
1663
97
98
99
00
01
02
03
04
05
06
Year
Hazardous Waste Generated/Aircraft Produced


Summary
Regulated Process Water
per Aircraft
30000
25000
20000
15000
10000
5000
0
Gallons
27486
23243
15930
10918
13128
10253
10568
7197
6351
6535
97
98
99
00
01
02
03
04
05
06
Year
Regulated Process Water/Aircraft Produced

A-4'

4. **Describe financial benefits and savings from implementing a pollution prevention program.**

Environmental performance is one key to maintaining competitive viability and is an essential segment in developing a production strategy. Compliance and performance are viewed as valuable assets and instrumental in sustaining a positive corporate image.

Environmental awareness and pollution prevention generate both tangible and intangible savings. Tangible savings are realized when effective planning is incorporated into physical operations resulting in quantifiable cost reduction or cost avoidance. Intangibles can arguably be of greater value. An example would be: a positive image both within the community and for marketing and sales purposes. This is achieved not only through good public relations but by facilitating a regulatory environment that will support efficient production while minimizing the potential for restrictions, fines, and production interruptions.

During the ten year period ending 2007, the Dassault Falcon Jet - Little Rock operation has targeted (53) specific environmental goals and addressed numerous lesser projects. Addressing these goals has resulted in environmental benefits and permitting advantages, as well as millions of dollars in cost savings or avoidance. Four of the projects listed earlier are ongoing. However, the savings or cost avoidance realized as a result of 2006 target projects totaled $594,000 for the fiscal year.

5. **Describe how your program or activity can serve as a model for other like industries.**

The Dassault environmental and pollution prevention program is the result of careful planning, collaboration, and implementation of selected programs and activities. The support of both senior management and production divisions (personnel) is necessary. Cooperation with regulators and ongoing training is critical. Each of these is generally achieved over an extended period of time and improves as entities began to realize their role and that environmental benefits and production need not be mutually exclusive. In fact, as demonstrated above, environmental improvements may result in financial advantage.

Submitted by: Dassault Falcon Jet – Little Rock

Any questions regarding this submission should be referred to:

Eugene Jamison	210-0375
Peter Christiansen	210-0147

Attachment H-5

Little Rock Wastewater Utility

1001 Temple Street
Little Rock, Arkansas 72202
501 / 688-1525
FAX # 501 / 688-1540

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
(Article No. 7005 1160 0001 0894 3102)

COPY

March 31, 2006

Mr. Rudy McCormick, Vice President
Arkansas Painting and Specialties
815 Thomas Street
Little Rock, AR 72202

Subject: INDUSTRIAL WASTEWATER DISCHARGE PERMIT C-54 -Revised

Dear Mr. McCormick:

Little Rock Wastewater Utility (LRWU) has completed the review process of the Baseline Monitoring Report and has completed an inspection of the new phosphate coating operation, sewer flow meter and sampling manhole at Arkansas Painting and Specialties. All items have met LRWU approval and enclosed with this letter is the Revised Industrial Wastewater Discharge Permit for Arkansas Painting and Specialties. This permit includes discharge limitations and monitoring requirements for two regulated outfalls. This permit will be in effect until December 31, 2007 at which time you will be required to reapply. LRWU will prompt you to reapply at least ninety (90) days prior to the permit expiration date.

If you make any changes in you operations that would result in a change in wastewater characteristics or result in a new wastewater discharge to the sanitary sewer you must notify LRWU prior to the change. See Permit C-54 Part II Section D.3.

Please review Attachment No. 1 for changes in Spill and Slug Notification Procedures. Please review all items in Permit C-54. If there are any questions please contact Louise Hogan at 501-688-1529, or me at 501-688-1547.

Sincerely,
LITTLE ROCK WASTEWATER UTILITY

Jeff Davis

Jeff Davis, Pretreatment Supervisor
Environmental Assessment Division

cc: Arkansas Painting and Specialties
EAD Compilers File
Readers File

LITTLE ROCK WASTEWATER UTILITY
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NUMBER: C-54

AUTHORIZATION TO DISCHARGE INDUSTRIAL PROCESS FLOW TO THE CITY OF LITTLE ROCK WASTEWATER UTILITY

In accordance with the provisions of City of Little Rock's General Ordinance 17,965, and Pretreatment Ordinance 17,966, Environmental Protection Agency Regulation 40 CFR 403 (General Pretreatment Regulations), and any applicable provisions of Federal or State of Arkansas Law, the following facility,

Arkansas Painting and Specialties
815 Thomas Street
Little Rock, AR 72202

is authorized to discharge industrial wastewater to the City of Little Rock Sanitary Sewer System as described below:

Outfall 01 - Phosphate coating rinse tank overflow effluent into Little Rock Wastewater Utility collection system, map page 15H, manhole 61.

Outfall 02 - Phosphate coating rinse tank overflow effluent into Little Rock Wastewater Utility collection system, map page 15H, manhole 114.

All discharges must be in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, III, and Attachment I hereof.

This permit is revised in accordance with the application filed on September 1, 2005 and the Baseline Monitoring Report filed on February 9, 2006 with the Environmental Assessment Division of Little Rock Wastewater Utility, and in conformity with plans, specifications, and/or other data submitted in support of the application.

This permit shall become effective on April 1, 2006. This permit and the authorization to discharge shall expire on midnight, December 31, 2007.

Signed this 31st day of March , 2006

Susan Redbetter /tr
Stanley B. Suel, Director
Environmental Assessment Division
Little Rock Wastewater Utility

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PART I
PERMIT REQUIREMENTS

SECTION A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS: OUTFALL 01 - Phosphate coating line rinse overflow to Map Page 15H manhole 61. The sampling manhole is a private manhole located directly upstream of manhole 15H-061. The sampling manhole is located between the office area and the sandblasting shop.

During the period beginning on the effective date of this permit and lasting through the date of expiration, the permittee is authorized to discharge from outfall 01. Samples taken in compliance with the monitoring requirements specified below shall be taken at the following location(s): Phosphate coating line- final rinse effluent at the private sampling manhole. Such discharge shall be limited and monitored by the permittee as specified below (see notes 1 and 2 below):

Effluent Characteristics[9]	Discharge Limitations		Monitoring Requirements	
	Monthly Average	Daily Max	Measurement Frequency[8]	Sample Type
Flow	Report Only[3]	Report Only[3]	Daily	Totalized Meter
Zinc (Total)	1.48 mg/L	2.61 mg/L	1/month	Composite[4]
Cyanide (Total)	0.65 mg/L	1.20 mg/L	1/6 months	Grab[5]
Chromium (Total)	1.71 mg/L	2.77 mg/L	1/6 months	Composite[4]
Copper (Total)	2.07 mg/L	3.38 mg/L	1/6 months	Composite[4]
Nickel (Total)	2.38 mg/L	3.98 mg/L	1/6 months	Composite[4]
Cadmium (Total)	0.07 mg/L	0.11 mg/L	1/6 months	Composite[4]
Silver (Total)	0.24 mg/L	0.43 mg/L	1/6 months	Composite[4]
Lead (Total)	0.43 mg/L	0.69 mg/L	1/6 months	Composite[4]
pH	N/A	≥5.0 S.U. and ≤ 11.0 S.U.	1/6 months	Grab[5]
Total Toxic Organics(TTO)[6]	N/A	2.13 mg/L	1/6 months	See Note 7 Below

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Notes:
1. All sampling and analysis conducted to fulfill the requirements under this section shall be conducted during normal work cycles.
2. All samples analyzed to fulfill the requirements must be performed in accordance with the latest approved method listed in 40 CFR, Part 136. If performed by an outside laboratory (or contract laboratory) shall be performed by a laboratory certified for that analysis by the Arkansas Department of Environmental Quality in accordance with the latest approved methods in 40 CFR Part 136. If an approved method is not contained in 40 CFR Part 136, contact Little Rock Wastewater Utility (LRWU) for method selection guidance.
3. Flow shall be recorded daily in units of gallons per day (gpd) during normal work cycles. The maximum daily flow and monthly average shall be reported on the monthly self monitoring report in accordance with Part II, Section D(4).
4. Sampling for metals must be a four-part one day composite at a minimum.
5. Sampling for cyanide and pH must be grab samples collected at the designated sampling location.
6. In lieu of monitoring for Total Toxic Organics (TTO), the permittee may submit a toxic organic management plan (TOMP) for Utility approval. Once the TOMP has been approved by Little Rock Wastewater Utility and has been fully implemented by the permittee, all monitoring requirements for TTO will be dropped (40CFR433.03).
7. Sampling of all groups of TTO compounds except volatile organics must be a four-part one day composite at a minimum. Volatile organic samples must be a grab collected in an appropriate container.
8. Sampling should be performed once in the period of December - May and once in the period of June - November, if the sampling frequency is 1/6 months.
9. Arkansas Painting and Specialties must notify the Utility for approval prior to batch discharges from any of the three phosphate line tanks. The Utility may require additional analytical testing of the individual tanks for which Arkansas Painting and Specialties is requesting approval for discharge. See Part II Section D.3. of this permit for notification procedures required for changes in wastewater discharge characteristics.
10. Arkansas Painting and Specialties must provide 48 hour advance notification of plans to operate and discharge wastewater from this phosphate coating operation.

SECTION B. SCHEDULE OF COMPLIANCE

The permittee shall achieve compliance with the effluent limitations specified in Section I.A. of this permit in accordance to the following schedule.

Compliance with effluent limitations is required on the effective date of the permit.

PART II - GENERAL CONDITIONS

SECTION A - SPILL AND SLUG CONTROL

The permittee shall adhere to the accidental spill prevention plan submitted to the Utility. Emergency Notification signs shall be posted where indicated in the plan (City of Little Rock's Pretreatment Use Ordinance 17,966 Section 6.7). See Attachment No. 1 at the end of this permit for notification procedures.

SECTION B - BYPASS PROHIBITED

Bypass means the intentional diversion of wastestreams from any portion of an Industrial User's treatment facility (40CFR 403.17(a)(1)). Bypass notification and prohibition provisions are listed below:

1. If, for any reason, the permittee knows in advance that a bypass of treatment system operations will occur, the permittee shall notify the Utility, if possible, at least ten (10) days before the anticipated bypass.

2. If the bypass is not anticipated, the permittee shall notify the Utility orally within 24 hours of becoming aware of the bypass (40 CFR 403.17).

3. Within five (5) days of the permittee becoming aware of any bypass, the permittee shall submit a written report to the Utility describing the bypass, its cause, duration, including exact dates and times (or, if it has not been corrected, how long it is expected to continue), and the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass. The Utility may waive the written report on a case by case basis if the oral report has been received within 24 hours (40 CFR 403.17).

4. Bypass is prohibited. The Utility may take enforcement action against the permittee for a bypass unless:

   A. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage or no feasible alternative exists (40 CFR 403.17).
   B. There is no feasible alternative to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal period of equipment downtime.
   C. The permittee submitted notices as required under Section B.1-3 above.

5. The Utility may approve an anticipated bypass, after considering its adverse effects, if the Utility determines it will meet the three conditions listed in paragraph B.4.

The permittee may allow any bypass to occur which does not cause permit limits or requirements to be violated, but only if it is for essential maintenance to assure efficient operation. Controlled bypass for essential maintenance that do not cause violations of limits or requirements are not subject to the provisions listed above.

SECTION C - OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

The permittee shall continuously maintain any effluent treatment devices or systems in satisfactory operating condition in accordance with the City of Little Rock's Pretreatment Ordinance 17,966, Sections 3.1-3.3. Maintenance and calibrating records for these devices or systems shall be retained and available for inspection.

Sewer meters or other effluent flow measurement devices used for reporting flow shall be calibrated and maintained to assure the accuracy of the measurements are within the maximum deviation of less than ±10% from the discharge rates. The permittee shall have the effluent flow meter checked and/or calibrated a minimum of once per year by a factory trained representative and retain on file proof of this check or calibration.

SECTION D - REPORTING REQUIREMENTS

1. The permittee shall notify the Utility **IMMEDIATELY** of any accidental spill, slug discharge, or upset of the wastewater pretreatment system. A slug discharge includes a spill, upset, or any non-routine discharge which could cause a violation of Part IA discharge limitations or a violation of prohibited discharge standards (listed in Industrial Wastewater Discharge Permit Part III Standard Conditions, item N). The notification shall include the location of the discharge, type of waste, concentration and volume of the waste, and corrective actions taken. The notification shall be made in accordance to the Notification Procedures in Attachment No. 1 of the permit. Attachment No. 1 (or facsimile thereof) is suitable for posting at locations as necessary to ensure that appropriate personnel are aware of the notification procedures required by Little Rock Wastewater Utility and this permit.

2. Within five (5) days of the initial notification of item 1 above, the permittee will submit a detailed written report describing the cause and its impact on the permittee's compliance status; the duration and extent of the noncompliance, including quantities and concentrations, dates and times of the noncompliance, and if the noncompliance is continuing, when compliance is expected to occur, and all steps taken or to be taken to prevent reoccurrence (City of Little Rock's Pretreatment Ordinance 17,966, Section 6.7).

3. The permittee shall notify the Utility prior to the introduction of new wastewater or pollutants; any substantial change in the volume or characteristic of the wastewater being discharged to the sanitary sewer, or any new construction or process modifications involving plumbing changes. This notification shall be written and the permittee must receive Utility approval before the changes can occur.

4. The permittee shall submit monthly self monitoring reports for the parameters listed in Part I, Section A of this Permit. This report will contain monthly average flows and maximum daily flows for the process(es) listed in Part I, Section A of the Permit. These reports must contain a certified statement that all sampling and analysis was performed according to EPA regulations, (40CFR403.12). All monthly self monitoring reports are due by the last day of the month following the month in which the sample is collected. The permittee must use the self monitoring form provided by the Utility.

5. The permittee shall notify the Utility of any violations of the pretreatment standards specified in Part I, Section A of this Permit. If sampling performed by the permittee indicates a violation, the permittee shall notify the Environmental Assessment Division by telephone within one (1) business day of becoming aware of the violation (40CFR403.12.g.2).

6. Recording of Results

   For each measurement or sample taken pursuant to the requirements of this permit, the User shall record the following information:

   A. The exact place, date, and time of sampling or measurement;
   B. The person(s) doing the sampling or measurement;
   C. The dates and time the analyses were performed;
   D. The person(s) who performed the analyses;
   E. The analytical techniques or methods used; and
   F. The results of all required analyses.

7. The permittee will submit no later than the last day of the months of June and December a Periodic Report on Continuing Compliance. These reports will cover the six month period preceding the month in which the report is due. The permittee will collect a sample during the reporting period (December-May for the June report and June-November for the December report) and have it analyzed for all parameters listed in Part I, Section A of this Permit for the purpose of completing a Periodic Report on Continuing Compliance. The Periodic Report on Continuing Compliance must be reported on the Utility's form and must include the average of the six monthly report values from samples collected during that period and single results of other

parameters not collected monthly. As with self monitoring the permittee must certify that all samples collected during the reporting period were collected and analyzed in accordance with EPA regulations.

8. If the permittee monitors any pollutant more frequently than required by Part I, Section A of this Permit, the results of such monitoring must be included in the reports required by Part II, Sections D(4) and D(5) of this Permit (40CFR403.12.g.5).

9. All written reports required by this permit will be submitted to the following address:

Little Rock Wastewater Utility
Environmental Assessment Division
1001 Temple Street
Little Rock, AR 72202
Attn.: Pretreatment Supervisor

10. Sewer Metering

A. Reporting - If the permittee has a sewer meter, the permittee shall submit the sewer meter readings for billing by the fifth (5^{th}) day of each month. The permittee shall use the Sewer Meter Reporting Form supplied by the Utility. All sewer meter reports shall be sent to the address listed below.

Little Rock Wastewater Utility
Environmental Assessment Division
1001 Temple Street
Little Rock, AR 72202
Attn.: Pretreatment Supervisor

B. Modifications to Existing Installations- The permittee shall notify the Environmental Assessment Division in writing and obtain approval prior to making any modifications to sewer meter, including pipe changes, new meter installations, new flow monitoring equipment, or meter change outs.

11. Diversion Metering

A. Reporting - The permittee shall report diversion meter readings by the fifth (5th) day of each month to receive credit for waters that are not discharged to the sanitary sewer. The permittee shall use the Diversion Meter Reporting Form supplied by the Utility. All diversion meter reports shall be sent to the address listed below:

Little Rock Wastewater Utility
Finance and Administration Division
PO Box 45090
Little Rock, AR 72214

B. Modifications to Existing Installations- The permittee shall notify the Environmental Assessment Division in writing and obtain approval prior to making any modifications to diversion metering, including pipe changes, new meter installations, or meter change outs.

SECTION E –ADDITIONAL CHARGES AND FEES

The permittee may be subject to additional sewer charges as provided for in the City of Little Rock's Sewer Rate Ordinance No. 18,752, and any future amendments thereto. Further, the Manager of the Little Rock Wastewater Utility may collect fees under the City of Little Rock's Pretreatment Ordinance No. 17,966.

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K. Property Rights - The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of federal, state, or local regulation.

L. Proper Disposal of Pretreatment Sludge and Spent Chemicals - The permittee shall dispose of any sludge or spent chemicals in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act (40CFR403.8(f)(2)(iii)).

M. Confidentiality - All reports and data related to the requirements of this permit shall be available for public inspection at the Little Rock Wastewater Utility, 221 E. Capitol Avenue except for that information that is deemed confidential in accordance with the provision of the City of Little Rock's Pretreatment Ordinance 17,966 Section 8.

N. Prohibited Discharge Standards

1. General Prohibitions. No user shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes pass through or interference or in any way contaminates the POTW biosolids, scum, or residues to such a level as to render them unacceptable for economical reuse or reclamation. These general prohibitions apply to all users of the POTW whether or not they are subject to categorical pretreatment standards or any other National, State, or local pretreatment standards or requirements.

2. Specific Prohibitions. No user shall introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:

2.1 Liquids, solids, or gases which by reason of their nature and quantity are, or may be, sufficient either alone or by interaction with other substances to cause a fire or explosion hazard or be injurious in any other way to the POTW or the operation of the POTW. Such materials include, but are not limited to, gasoline, diesel, benzene, naphtha, fuel oils, kerosene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, or sulfides, or any wastestream with a closed cup flash point of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;

2.2 Water or wastes having a pH lower than 5.0 S.U. or greater than 12.0 S.U. or having any other corrosive property capable of causing damage or a hazard to the structures, equipment, and personnel of the POTW. In no case shall waters or wastes be discharged at such a flow rate and/or pH which will cause the influent at the POTW treatment plant to be lower than 6.0 S.U. or greater than 9.0 S.U.;

2.3 Solid or viscous substances in quantities or of such size capable of creating a stoppage, plugging, breakage, or any reduction in sewer capacity or any other damage to the POTW such as, but not limited to, ashes, cinders, sand, plastic, wood, un-ground garbage, whole blood, hair and fleshings, entrails, and paper dishes, cups, milk containers, etc. Any additional sewer or sewerage maintenance expenses caused by such a discharge, or any other expenses attributable thereto will be charged to the User by the Utility. Any refusal to pay the additional maintenance expense duly authorized by the Manager shall constitute a violation of the provisions contained herein;

2.4 Pollutants, including oxygen-demanding pollutants (BOD, COD, 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, upset, or loss of efficiency at POTW. In no case shall a slug load have a flow rate or contain a concentration or quantity of pollutants that exceed for any time period longer than fifteen (15) minutes more than five (5) times the average twenty-four (24) hour concentration, quantity, or flow during normal operation of the discharger;

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

O. National Categorical Pretreatment Standards

1. The categorical pretreatment standards found at 40 CFR Chapter I, Subchapter N, Parts 405-471 are hereby incorporated. Those standards, if more stringent than the limitations imposed by the latest approved "Technically Based Local Limits Development Document" for sources in that sub-category, shall supersede the limitations imposed by the Local Limits.

2. Where a categorical pretreatment standard is expressed only in terms of either the mass or the concentration of a pollutant in wastewater, the Manager may impose equivalent concentration or mass limits in accordance with 40 CFR 403.6(c).

3. When wastewater subject to a categorical pretreatment standard is mixed with wastewater not regulated by the same standard, the Manager shall impose an alternate limit using the combined wastestream formula in 40 CFR 403.6(e).

P. State Pretreatment Standards - State pretreatment standards located in Section 4 of Regulation No. 6 : Regulations for State Administration of the National Pollutant Discharge Elimination System for a particular industrial sub-category, if more stringent than the requirements of this Ordinance, shall supersede the requirements of this Ordinance, are hereby incorporated by reference and will be imposed where applicable and shall include, but is not limited to, discharge limitations and reporting requirements. This shall include those regulations currently promulgated or which will be promulgated in the future including any amendments, and shall be recognized as part of this Ordinance.

Q. Local Limits

1. No person shall discharge any waters or wastes at a concentration that would exceed the concentration of pollutants, including but not limited to, those identified in the "Technically Based Local Limits Development Document", and adopted by the Manager of the Little Rock Wastewater Utility and approved by the Arkansas Department of Pollution Control and Ecology and the Little Rock Sanitary Sewer Committee.

2. The Utility will develop and assign specific discharge permit limitations for pollutants for permitted users based on criteria approved by the Manager. The specific permit limits shall ensure that local limit pollutant concentrations will protect the wastewater treatment plant from upset. The Local Limits shall apply to the total flow or total discharge from the Industrial Users. In developing specific permit limits, the Manager may impose mass limitations in addition to, or in place of, specific concentration-based limits. In addition, the Utility may develop specific discharge limitations for any other toxic pollutants which the Manager of the Utility may determine to be of sufficient quantity to cause POTW interference and/or pass through, endanger the health and safety of the POTW personnel or the public health, cause a POTW permit violation or render the POTW sludges unacceptable for economic reuse or reclamation.

Attachment A-6

LITTLE ROCK WASTEWATER
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NUMBER: C-69

AUTHORIZATION TO DISCHARGE WASTEWATER FLOW TO LITTLE ROCK WASTEWATER

In accordance with the provisions of City of Little Rock's General Ordinance 17,965, and Pretreatment Ordinance 17,966, Environmental Protection Agency Regulation 40 CFR 403 (General Pretreatment Regulations), and any applicable provisions of Federal or State of Arkansas Law, the following facility,

Progress Rail Services
4301 Pratt Remmel Road
Little Rock, AR 72209

is authorized to discharge domestic only wastewater to the City of Little Rock Sanitary Sewer System as described below:

Outfall 01 - Domestic only, no industrial process wastewater discharge to the Little Rock Wastewater collection system at Map Page 19L Manhole Number 05.

All discharges must be in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, III and Attachment 1 hereof.

This permit is granted in accordance with the application filed on March 22, 2007 with the Environmental Assessment Division of Little Rock Wastewater, and in conformity with plans, specifications, and/or other data submitted in support of the application.

This permit shall become effective on May 1, 2007.

This permit and the authorization to discharge shall expire on midnight, April 30, 2009.

Signed this 27th day of April 2007

Susan Tedbetter /for
Stanley B. Suel, Director
Environmental Assessment Division
Little Rock Wastewater

MISC SAMPLING 08

DATE & TIME:	@ AM / PM / °C		
WASTEWATER TEMPERATURE, FIELD	☒ N/A See Temperature Benchard		
CN- SAMPLE TESTED FOR SULFIDE	☐ POSITIVE ☑ NEGATIVE ☐ N/A		
CN- SAMPLE TESTED FOR CHLORINE	☐ POSITIVE ☒ NEGATIVE ☐ N/A	COMMENTS:	
POTENTIAL TEST INTERFERENCES:	☒ NONE ☐ CHLORINE ☐ HOSPITAL ANTISEPTIC ☐ OTHER (SPECIFY)		
COLOR Tan OIL none FLOW IN PIPE normal TURBIDITY turbid			
WASTEWATER CHARACTERIZATION OF COMPOSITE SAMPLE			
TYPE OF SAMPLE: ☒ INDUSTRIAL WASTE ☐ PLANT INFLUENT ☐ FINAL EFFLUENT ☐ RIVER WATER ☐ OTHER (SPECIFY STP/OTHER)			SAMPLER NUMBER 725Y
SIGNATURE			
☐ W. Allen Gallin ☐ Susan Samples Ledbetter ☐ Mikel L. Murders ☐ W. Paul Foster ☐ M. Louise Hogan			
IND. TECH. NAME (IF NAME IS NOT RECORDED PRINT NAME) ☒ Bod K. Scarborough ☒ Brett Vandiver ☐ Albert Hagood ☒ Randy Weaver			
☒ PROTOCOL ☐ RETEST ☐ COMPLIANCE ☐ TOXIC POLLUTANT SCAN ☐ OTHER (SPECIFY)			
MONITORING REQUESTED BY:			
I.D. NUMBER: 105S	SAMPLE NUMBER: 005	SET-UP COLLECTION DATE & TIME 10-11-06 @ 9:21 AM/PM ~~10-11-06 @ 9:22 AM/PM~~	TAKE-OFF COLLECTION DATE & TIME 10-12-06 @ 9:00 AM/PM

LITTLE ROCK WASTEWATER UTILITY

ENVIRONMENTAL ASSESSMENT DEPARTMENT

CHAIN OF CUSTODY RECORD

COPY

SAMPLE TYPE: COMPOSITE	SAMPLE TYPE: Grab Sample Collected Date & Time	PRESERVATIVE	SAMPLE BOTTLE: TYPE & NUMBER		PARAMETERS REQUESTED (CIRCLE WHEN PARAMETER COMPLETED)	DESIGNATED LABORATORY	TAG/SEAL
N/A	N/A am / pm	N/A	P G	N/A	Field pH, Temperature Setup	N/A	N/A
Sample Relinquished By (Signature) Date & Time:					Received By (Signature)		
24 Hr	N/A am / pm	ICE, pH adjusted to 1.44 w/ 1:1 HNO_3	P G	A41-07	Cu(t), Cr(t), Ni(t), Zn(t), Pb(t), Ag(t), Cd(t)	LRWU	V
Sample Relinquished By (Signature) Date & Time: [signature] 10-12-06 2:11pm					Received By (Signature) DrayRearson		
~~EDTA~~ NH Hr	10-11-06 9:22 am / pm	ICE, pH adjusted to 12.30 w/ 10 N NaOH	P G	A41-08	CN-(t)	LRWU	C
Sample Relinquished By (Signature) Date & Time: [signature] 10-11-06 2:03pm					Received By (Signature) [signature]		
N/A	N/A am / pm	N/A	P G	N/A	Field pH, Temperature Take-off	N/A	N/A
Sample Relinquished By (Signature) Date & Time:					Received By (Signature)		
Sample Relinquished By (Signature) Date & Time:					Received By (Signature)		

EAD Laboratory Personnel's Initials: ☐ ☐ TIR ☒ TDP ☐ TDG ☐ MCC ☐ ZAR ☐ SRB ☐ LLI — Contract Lab Sample Custodian Name: (Print)

COMMENTS — Page 1 of 1

DATA REVIEWED BY: (SIGNATURE) Tim Garrett — DATE REVIEWED 11-20-06

SAMPLE DATE: 10-11-06 SAMPLE I.D. & NO. 105S-005 CLASSIFICATION ☐ A ☒ B ☐ C METAL

Attachment A-8

CIU 40CFR433

COPY

Sampling Rationale

Industry: Arkansas Painting and Specialty
Address: 815 Thomas Street
Sampling Location: The private sampling manhole is located across the street (9th Street) from the main office in between the buildings on Fairpoint near the power pole.

Sampling Rationale: Arkansas Painting and Specialty is sampled once per quarter. Flow through the sample point is consistent and is primarily from the tunnel washer overflow. Categorical flow is measured by an inline meter discharging to the sanitary sewer outfall. Due to this constant rate of discharge samples are collected as time proportional composites. IU has a long term history of meeting compliance without pretreatment of overflow rinse.

Attachment 1

LITTLE ROCK WASTEWATER
ENVIRONMENTAL ASSESSMENT DIVISION
INSPECTION REPORT

COPY

Facility Name:	Wheatland Tube
Facility Address:	8200 Frazier Pike
Contact Person, Title:	Cornelious Jones, Quality Engineer
Phone No.:	490-1900
Date:	July 19, 2007
Subject:	Off-Year Inspection

Inspection Report

Summary

On July 18, 2007 Little Rock Wastewater, Environmental Assessment Division conducted Wheatland Tube's Off-Year Inspection. Paul Foster, Industrial Inspector conducted in the inspection, with Cornelious Jones, Quality Engineer acting as guide. There were no significant changes in operation since the last inspection.

Observations

Pre-Inspection Meeting

Mr. Jones replaced Richard Main as primary contact in May 2007. A Pre-Inspection meeting was held with Mr. Jones in which the following topics were discussed:

1. EAD had stopped receiving Wheatland COC and lab reports by e-mail. Mr. Jones was told that sending these documents electronically or with his monthly IUSM reports was his option, but that he needed to make sure that they were turned into EAD each month.
2. Mr. Jones was also reminded that Wheatland's previous month's IUSM reports were due into EAD but the last day of each current month.
3. During the 2006 Permit Renewal Inspection Wheatland had stated that they were planning eliminate the chrome plating process by October 2006. Mr. Jones was asked about the status of that project. Mr. Jones stated that several different coating processes had been researched and experimented with, but that a cost effective replacement had not been found.
4. The issue of the use of Sodium Metabisulfite used as a neutralizer for chromate solution spills interfering with the private labs matrix spikes was discussed and Mr. Jones was reminded that plant personnel should be reminded to be conservative in the chemical's use.

Galvanizing Mill

This mill cold rolls and applies zinc galvanizing and chrome to strip steel to form galvanized pipe using the following steps:

1) Alkaline Cleaner

The strip steel is cleaned with sodium hydroxide and rinsed. The rinse water is discharged to the treatment system.

2) Rolling

The strip steel is rolled into tubes. Cooling water is used to cool the rollers and the steel during the operation. The water is re-circulated to a secondary holding pit for replenishing and reuse in the cooling system. Drag-out discharges to the treatment system.

3) Welding
The tube is welded and the weld quenched. The quench water is re-circulated to the secondary holding pit with the drag-out discharging to the treatment system. Wheatland has added a longer quench tube (bath) after the welding operation this has doubled the amount of water used.

4) Interior Painting
The interior of the tube is painted by a long wand that enters the tube prior to the rolling and paints the tube after the welded tube is quenched. The paint fumes are collected by updraft hoods at the cut off station. No water is discharged from this operation.

5) Alkaline Cleaning
The tube is alkaline cleaned and rinsed a second time. Drag-out from the rinse operation is discharged to the treatment system.

6) Acid Pickling
The tube is immersed in hydrochloric acid and rinsed. Periodic batch discharge from the process line, Drag-out from the rinsing and water from the acid fume scrubber is discharged to the treatment system.

7) Preheat
The tube is preheated prior to galvanizing.

8) Zinc Galvanizing
The tube passes through a vat of molten zinc. The excess zinc is removed with air knives and the tube cooled with re-circulated water. Drag-out from cooling water is discharged to the treatment system.

9) Sizing
The tube is passed through a sizing mill. Water is used to cool the roller and tube. Drag-out is discharged to the treatment system.

10) Chromating
The tube passes though a sealed box and is flooded with chromic acid. The acid is squeezed off as the tube as it exists the box. This is a closed system with no discharge to the treatment system. The spent chrome solution is transported to a separate treatment system via 55-gallon drums.

11) Cut Off
The tube is cut to length and stacked.

Secondary Holding Pit
Most water from steps 2, 3, 4, 6 and 9 are sent to a cooling tower then to the secondary holding pit, there the water is passed through an Ozone treatment system and a side loop oil/gravity separator and returned to the milling line. This system is dumped every 4-6 months back to the pretreatment system.

Cold Roll Mill #2

This mill uses the same procedures for making the pipe (steps 1-5, 9, 11) but does not galvanize or chromate. All cooling fluids are recirculated until they are exhausted (discharged approximately twice per year @ 1,000 gallons) then pretreated in the clay pretreatment system before being sent to the main treatment system. Caustic cleaning before pipe painting is the only waste source that discharges directly to the main treatment system.

Clay/Polymer Settling Pretreatment
Wheatland Tube has installed a pretreatment system to treat wastewater associated with the threading line coolant, mop water and Mill #2 coolant. This system consists of the exterior waste tank (outside 3,000 gallons) which is used to hold the mop water and threading line waste cutting solution. When a sufficient amount has accumulated to justify treatment it is pumped over to a 1,500 gallon conical tank where bentonite clay and polymer are added to

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remove oil and grease as well as metals. Once sufficient separation has been achieved any supernate is drawn off and sent to the head works of the treatment system and the sludge is sent to the filter press and the dry cake is disposed of in solid waste. Press filtrate is also piped to the main treatment system head works for further treatment. Both discharges are part of the operations covered under 40CFR420 therefore will not effect the calculation of discharge limits. Currently Mr. Jones is treating water about every 4 months. Most of the material is oil which is separated out in the tank and hauled by U.S. Filter.

Treatment System
The treatment system utilizes a two-stage hydroxide precipitation system to treat the wastewater from both mills. The wastewater from the lines is collected in a sump pit, (with oil skimmer belt) from there it is pumped to the treatment system. In the first stage, the pH of the wastewater is adjusted with sulfuric acid or sodium hydroxide to a pH between 3.5 to 5.5 standard units. At this pH, oils and greases are broken down and zinc ions are returned to solution. In the second stage, lime is added to the wastewater to raise the pH to 9.25 standard units (Wheatland has also added a bubbler in this stage to reduce the presence of anaerobic bacteria in the wastewater). This is the pH for optimal zinc precipitation. The wastewater is then discharged to a new clarifier installed 6/1/05. Polymer, to aid in flocculation, is added to the wastewater in the flash mixer attached prior to the clarifier. Once through the clarifier the water overflows to the sanitary sewer. Clarifier sludge is collected and pressed. The dried cake is disposed in the solid waste dumpster. The oil from the sump pit is pumped into a holding tank. The water is decanted and the oil disposed of by U. S. Filter.

Chrome Reduction System
Wheatland is now using an automatic chrome reduction system to treat the hexavalent chrome to trivalent chrome. This system includes a 110 gallon reaction tank and an automatic controller to inject sulfuric acid for pH adjustment and Sodium Metabisulfite to control ORP. Discharge from this system is still batch as required by permit and to the headwork of the main pretreatment system.

Follow-Up

Type Originator's Name: Paul Foster, Industrial Inspector **Date Document Initiated:** July 20, 2007

Originator's Signature: W Foster **Signature Date:** 9/10/07

Select Routing Slip Sequence: [X] **One after another** (Enter Order Below) **or** [ ] **All at once √ Recipient's Name**

Routing Sequence		Routing Recipient	Originator Requests Recipient to Comment, Sign, and/or Approve			Date Signed
#	Check		Comments Requested	Indicate Whether Signature(s) Are Required (The original will be I-O mailed for signature)		
1		Allen Gatlin				
2		Stanley Suel				

Comment No. 1: - No Comment
EAD Staff Member: Allen Gatlin/Jeff Davis
Date: July 20, 2007

Comment No. 2: - Not Routed For Comment / No Comment
EAD Staff Member: Jeff Davis/Susan Samples Ledbetter
Date:

A-9c

Attachment A-10

COPY

LITTLE ROCK WASTEWATER UTILITY
221 EAST CAPITOL AVENUE
LITTLE ROCK, ARKANSAS 72202-2412

SLUG CONTROL PLAN EVALUATION FORM

40CFR403 Streamling Rule finalized October 14, 2005, specifies that POTWs must evaluate at least once the SIU's need for a Slug Control Plan or other action to control Slug Discharges by October 14, 2006. This form is used to document the evaluation of whether each SIU needs a plan to control slug discharges. Existing Slug Control Plans will be evaluated to determine if they meet the minimum requirements as described in the EPA Guidance Manual "Control of Slug Loadings to POTWs".

Facility Name Ark. Painting + Spec. Permit Number C-54

1. Does SIU have a document on file with EAD that addresses spills or slug discharges to the POTW? ☒ Yes (Complete table below) ☐ No (Go to quest. 3)

If a document is on file does it address the following requirements:

Describes discharge practices including non routine batch discharges:	☐ Yes ☒ No ☐ N/A
Describes stored Chemicals:	☒ Yes ☐ No ☐ N/A
Procedures for immediate notification to POTW of slug discharges:	☐ Yes ☒ No ☐ N/A
Procedures to prevent adverse impact from accidental spills to the POTW	☐ Yes ☒ No ☐ N/A
Are appropriate personnel provided training in the event of a spill or slug discharge:	☐ Yes ☒ No ☐ N/A

2. Does the SIU need to update their current control plan? ☒ Yes ☐ No ☐ N/A
(If yes, date requirement letter sent: 10-23-06 WAG)

3. Is a control plan needed? ☒ Yes ☐ No
(If yes, and not on file, date requirement letter sent: 10-23-06 WAG)

Comments on control plan evaluation:
Current plan dated 1997 - must be updated to include new phosphate coating line and any other changes.

Evaluation Performed By: Louise Hogan MLH Date: 9/9/06

MLH 9-11-06

Received & Approved
2-22-07
WAG

ARKANSAS PAINTING & SPECIALTIES, INC.
815 Thomas Little Rock AR 72202
501-374-5599 FAX 501-374-8659

COPY

Little Rock Waste Utility
Environmental Assessment Division
1001 Temple Street
Little Rock, AR 72202

Attn: Mr. Allen Gatlin

Dear Mr. Gatlin,

Enclosed please find an updated Accidental Discharge (Spill) and Slug Control Plan for Arkansas Painting and Specialties.

I apologize for the delay in furnishing this requirement to your office. Please do not hesitate to contact me if additional information or documentation is required.

Sincerely,

Rudy McCormick
Vice President

Cleaning of the coating line process tanks may result in a batch discharge. This permit requires Arkansas Painting and Specialties to notify Little Rock Wastewater Utility (LRWU) prior to draining of the coating process tanks. Wastewater sampling events for parameters listed in Permit C-54 Part I may be required during batch discharge.

The facility is located at 815 Thomas Street and discharges process wastewater into the Little Rock Wastewater collection system at Map Page 1511, Manhole 61. This discharge is designated as outfall 01 for this facility.

B. Description of stored chemicals:

1. Solvents	Parkers Xylene, toluene, and MEK solvents stored in 55 gallon drums in a separate building for solvents only.
2. Paints	Water base latex paints in 1and 5 gallon cans stored in a separate building with other paints.
	Oil base paints in 1 and 5 gallon cans stored in a separate building with other paints.
	Epoxy paint in 1 and 5 gallon cans stored in the separate paint building.
	Urethane paints stored in 1 and 5 gallon cans stored in paint building.
	Zinc coating (two components a powder and liquid) stored separately in the paint building.
	Dry powder paints stored near point of use.
3. Petroleums	Limited oils and lubricants stored in 55 gallon drums near point of use and in paint room.
	Two each underground storage tanks filled with diesel. Southern Company monitors these tanks for leakage.

2. We are inspecting the paint and solvent storage areas each time we are in these buildings. We are doing an expanded inspection once each month and recording the results.
3. We have absorbent socks and sand placed in strategic areas in case of spills.
4. Employees have been trained in material handling equipment and spill handling and disposal of waste.
5. Used solvents are stored in a 55 gallon drum and disposed of as a hazardous waste.

F. Certification Statement:

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 is 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 or imprisonment for knowing violations.

Rudy McCormick 2/21/07

Signature of Responsible Company Official Date

Rudy McCormick Vice President

Print Name/Title of Official

COPY

SPILL CONTROL PLAN

Wheatland Tube Company
Little Rock Division

Updated by Brian Moats
June 18, 2003

A-102

Description

Materials can enter the containment sump (5500 gal) prior to the pretreatment system through 5 separate means.

- The Galvanize Mill has a trench under the mill where all floor drains are plumbed to the containment sump.
- The Pipe Mill has an alkaline cleaning area with a small sump that is plumbed to the containment sump.
- The pretreatment room has a 680 gallon floor trench leading the containment sump.
- The bulk acid storage has a very small trench that will collect any small acid spills that occur when filling. The valve is closed so that storm water will not enter the system. The valve will not be opened unless a small spill occurs. The tank is double-walled to prevent any ruptures.
- Finally, the process water pit has a pump that must be manually activated that also pumps to the containment sump.

Other than the sanitary sewer drain connections, the remainder of the facility does not contain floor drains connecting to the Little Rock Wastewater Utility.

Chemical Usage

1. Acids – 55 gallons is the minimum container size for acids stored in the tube mill production areas and the treatment system area.
2. Caustics – 55 gallons is the minimum container size for caustics stored in the tube mill production areas and the treatment system area.
3. Alkaline cleaners – 55 gallons is the minimum container size for alkaline cleaners stored in the tube mill production areas and the treatment system area.
4. Chromate solutions – 55 gallons is the minimum container size for chromate solutions stored in the tube mill production areas and waste chromate solutions stored in the treatment system area.
5. Oils (free and soluble) – 55 gallons is the minimum container size for oils stored in the tube mill production areas.
6. Polymer is stored in a 350 gallon tank in the treatment system area.

Spill Containment Measures to be Employed

1. Acid, caustic, and alkaline cleaner spills will drain to the treatment system containment sump and pH adjustment will be automatically performed in the first and second stages of the treatment system. The treated effluent will them be discharged to the sanitary sewer. If the pH of the effluent falls below or exceeds permitted limits, the sludge transfer pump will be put in "hand" mode to pump the water into the sludge cone where it will be drained back into the containment sump. From the containment sump, the water can be pumped into tanks T-1A or T-1B for pH adjustment at a later time or pumped back to the first and second stages of the

pretreatment system for further pH adjustment. Once the pH in the clarifier (effluent) returns to compliance, the sludge transfer pump can be returned to automatic and the effluent can be discharged to the sanitary sewer.

2. Chromate solution spills will drain to the treatment system containment sump. The contaminated water in the containment sump will be pumped into tanks T-1A or T-1B for later treatment and testing. Chromate solution spills that enter the process water pit will be treated directly in the pit. Treated solutions will not be discharged to the sanitary sewer without notification and approval of Little Rock Wastewater Utility.
3. Soluble oils that reach the containment sump will be pumped in tank T-1A or T-1B for pH adjustment and returned to the receiving sump where free oils may be removed by the oil skimmer and disposed of off-site.
4. Free oils that reach the receiving pump will be removed by the oil skimmer located in the containment sump and disposed of off-site.
5. Polymer spills will drain to the floor trench in the treatment system room and will pumped into tank T-1A or T-1B and stored until the solution is recycled or disposed of off-site

Notification Procedures

Signs will be posted in the tube mill production areas and treatment system room indicating that the Environmental Health & Safety Manager and/or Maintenance Manager will be contacted in the event of a spill. In the event that a spill, accidental discharge, or slug load is discharged into the sanitary sewer, the Little Rock Wastewater Utility is to be notified as soon as possible after discovery of the spill.

Training

Training will be conducted for all personnel who monitor the treatment system or are responsible for chemicals which may be spilled into the treatment system. The training shall consist of classroom and/or on-the-job instruction and will be conducted on an annual basis.

The following was suggested by Mike Hutchison and included:

After day shift tech has gone home:

Check lime feed/recirculation pump and sodium hydroxide twice nightly for leaks.

Go onto catwalk and check tanks once per night.

Attachment A-11

Little Rock Wastewater Utility

1001 Temple Street
Little Rock, Arkansas 72202
501 / 688-1525
FAX # 501 / 688-1540

CERTIFIED MAIL – RETURN RECEIPT REQUESTED
ARTICLE NO. 7000 0600 0026 4079 0115

February 27, 2006

Mr. Rudy McCormick, Vice President
Arkansas Painting and Specialties
815 Thomas St.
Little Rock, Arkansas 72202

COPY

Re: NOTICE OF VIOLATION

Dear Mr. McCormick,

This Notice of Violation is issued to Arkansas Painting and Specialties due to the installation of the new phosphate coating line without prior notification to Little Rock Wastewater Utility (LRWU). Industrial Wastewater Discharge Permit C-54 issued to Arkansas Painting and Specialties on December 15, 2005 requires that LRWU is to be notified of any new construction or process modifications involving plumbing changes and receive approval before the changes can occur. This is stated in Part II Section D.3.

February 3, 2006 Arkansas Painting and Specialties was sent a letter with the requirement to submit a Baseline Monitoring Report (BMR), Toxic Organic Management Plan (TOMP) and to install a representative monitoring point for the new phosphate coating line. A monitoring location has not yet been installed.

By this letter, and in accordance with City of Little Rock Pretreatment Ordinance 17,966 Section 3.2.F., LRWU is requiring that Arkansas Painting and Specialties complete the installation of a monitoring point by March 10, 2006. Plans for the monitoring point must be submitted to LRWU prior to installation. A copy of the approved monitoring point specification was included with the letter on February 3, 2006; contact LRWU if another copy is needed.

Regulation 40 CFR 433 requires that representative monitoring is conducted to show continuing compliance with pretreatment standards. If you have any question(s) concerning this Notice of Violation, contact me at 688-1547.

Sincerely,
LITTLE ROCK WASTEWATER UTILITY

Jeff Davis, Pretreatment Supervisor
Environmental Assessment Division

cc: Readers File
EAD Compiler File
IU Correspondence File
Enforcement Activities File

COPY

Attachment A-12

LITTLE ROCK WASTEWATER UTILITY
221 EAST CAPITOL AVENUE
LITTLE ROCK, ARKANSAS 72202-2412

SLUG CONTROL PLAN EVALUATION FORM

40CFR403 Streamling Rule finalized October 14, 2005, specifies that POTWs must evaluate at least once the SIU's need for a Slug Control Plan or other action to control Slug Discharges by October 14, 2006. This form is used to document the evaluation of whether each SIU needs a plan to control slug discharges. Existing Slug Control Plans will be evaluated to determine if they meet the minimum requirements as described in the EPA Guidance Manual "Control of Slug Loadings to POTWs".

Facility Name: CertainTeed Roofing Permit Number C-13

1. Does SIU have a document on file with EAD that addresses spills or slug discharges to the POTW? ☑ Yes (Complete table below) ☐ No (Go to quest. 3)

If a document is on file does it address the following requirements:

Describes discharge practices including non routine batch discharges:	☐ Yes ☑ No ☐ N/A
Describes stored Chemicals:	☑ Yes ☐ No ☐ N/A
Procedures for immediate notification to POTW of slug discharges:	☐ Yes ☑ No ☐ N/A
Procedures to prevent adverse impact from accidental spills to the POTW	☐ Yes ☑ No ☐ N/A
Are appropriate personnel provided training in the event of a spill or slug discharge:	☐ Yes ☑ No ☐ N/A

2. Does the SIU need to update their current control plan? ☑ Yes ☐ No ☐ N/A
(If yes, date requirement letter sent: _____)

3. Is a control plan needed? ☑ Yes ☐ No
(If yes, and not on file, date requirement letter sent: 10-23-06)

Comments on control plan evaluation:
IU has a General SPCC Plan on File. Not specific to Sewer discharge.
Plan must address all spill/slug controls for storage & operational measure to prevent prohibited discharges

Evaluation Performed By: Allen Gatlin Date: 9-25-06
☐ Louise Hogan ☑ Allen Gatlin

AG 10/12/06

Attachment A-13

From: Travis Baldwin [tbaldwin@aecc.com]
Sent: Sunday, July 29, 2007 10:35 AM
To: Mikel Murders
Subject: Notification of Permit Violation

Mike:

I have just reviewed the analysis of the sampling performed for the latest discharge to the LRW system. We performed a discharge on 7/13/07. The report from Arkansas Analytical reveals that AECI met the permit level of all items except for PCBs. The permit level is 0.5ug/L and the report indicates the level is 2.63ug/L.

We are presently reviewing the system to determine the changes required to ensure future compliance. I will contact you to report our findings and the corrective action that we plan to take.

The self monitoring report will be sent per the permit requirements but I did want to alert you to the permit violation.

Please call if you have questions or would like to discuss.

Travis Baldwin
Manager, EED
Arkansas Electric Cooperatives, Inc.
[P] 501.570.2388
[F] 501.570.2986

Attachment A-14

COPY

City of Shannon Hills

Contract Agreement and Pretreatment Ordinance

Dated September 22, 1995

G. Any waters or wastes which will cause the influent concentration at the POTW treatment plant to exceed the following limits:

ELEMENT	mg/L
Arsenic	0.065
Barium	5.00
Boron	1.00
Cadmium	0.039
Chromium (total)	0.22
Copper	0.20
Cyanide	0.05
Lead	0.26
Manganese	1.00
Mercury	0.010
Nickel	0.30
Silver	0.37
Zinc	0.41

The Utility will develop and assign discharge permit limits for its permitted dischargers based upon the above limitations and the appropriate criteria. The specific permit limits will be developed to ensure the above limits are not exceeded at the POTW treatment plant.

In addition, the Utility may develop specific discharge limitations for any other toxic pollutants which may be determined to be of sufficient quantity to possibly cause POTW interference, POTW pass through, endanger the health and safety of the POTW personnel or general public, cause a POTW permit violation or which may render the POTW sludges unacceptable for economical disposal and use. Such substances include but are not limited to:

Antimony	Phenols
Beryllium	Rhenium
Bismuth	Selenium
Cobalt	Strontium
Herbicides	Tellurium
Molybdenum	Tin
Organic Solvents	Uranyl ion
Pesticides	

SECTION 4. No person shall discharge or cause to be discharged the following described substances, materials, waters, or wastes if it appears likely, in the opinion of the Manager of the Utility, that such wastes can harm either the sewers, sewage treatment process or equipment, contaminate the sludges of the POTW, have an adverse effect on the receiving stream, or can otherwise endanger life, limb, public property, or constitute a nuisance; in forming his opinion as to the acceptability of these waters, the Manager will give consideration to such factors as materials of construction of the sewers, nature of the sewage treatment process, capacity of the sewage treatment plant, degree of treatability of wastes in the sewage treatment plant, and other pertinent factors:

A. Any waters or wastes exhibiting any of the following characteristics:
   1. Any waters or wastes having a pH lower than 5.0 S.U. or greater that 11.0 S.U. or having any other corrosive property capable of causing damage or hazard to the structures, equipment, and personnel of the sewage works (POTW).
   2. Any waters or waste discharged at a flow rate and/or pH that will cause the influent pH at the POTW treatment plant to be lower than 6.0 S.U. or greater than 9.0 S.U.

B. Any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the Manager in compliance with applicable State or Federal regulations.

C. Materials which exert or cause:
   1. Unusual concentrations of inert suspended solids such as, but not limited to, Fuller earth, lime slurries, and lime residues, or of dissolved solids such as, but not limited to, sodium chloride and sodium sulfate.
   2. Excesssive discoloration such as, but not limited to, dye waste and vegetable tanning solutions not removed in the treatment process.

SECTION 5. If any waters or wastes which are discharged or which are to be discharged into the public sewers contain or possess any of the characteristics enumerated in Section 3, Section 4, or Section 7B of this Article and in the judgement of the Manager, may have a deleterious effect upon the sewage works, processes, equipment, sludges, or receiving waters, or which otherwise creates a hazard to life or constitutes a public nuisance, the Manager may (a) reject the wastes, (b) require pretreatment to an acceptable condition for discharge to the public sewers, and/or (c) require control over the quantities and rates of discharge.

If the Manager requires the pretreatment or equalization of waste flows, the design and installation of the plants and equipment shall be subject to the review and approval of the Manager and subject to the requirements of all applicable codes, ordinances, and laws. Where pretreatment or flow equalizing facilities are provided for any waters or waste, they shall be continuously maintained in satisfactory and effective operation by the owner or occupant at his own expense.

United States Environmental Protection Agency
Washington, D. C. 20460

EPA NPDES Compliance Inspection Report

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

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [ ] 2 [5]	3 [AR0021806] 11	12 [070911] 17	18 [G]	19 [T]	20 [1]

Remarks: 21 [Pretreatment Program Audit] 66

Reserved	Facility Evaluation Rating	BI	QA	Reserved	
67 [ ] 69	70 [ ]	71 [ ]	72 [ ]	73 [ ] 74	75 [ ] 80

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [ ] 2 [5]	3 [AR0021806] 11	12 [070912] 17	18 [4]	19 [T]	20 [2]

Remarks: 21 [09 IU Site Visits Conducted] 66

Reserved	Facility Evaluation Rating	BI	QA	Reserved	
67 [ ] 69	70 [ ]	71 [ ]	72 [ ]	73 [ ] 74	75 [ ] 80

Section B: Facility Data

Name and Location of Facility Inspected
Little Rock Pretreatment Program Audit
221 E Capitol
Little Rock, AR 72202

Entry Time	Permit Effective Date
[X] AM [ ] PM 7:00 9/11/07	1/1/07
Exit Time/Date	**Permit Expiration Date**
3:00 pm 9/13/07	12/31/11

CODE SHEET

Pretreatment Audit

		CODE
Auditor's Name	Gillian	
Permit Number	AR0021806	
Audit Date	9/11-13/07	DTIA
Date Permit Modified to require pretreatment	11/1/82	PTIM

PPETS WENDB DATA ELEMENTS

Significant IUs without Control Mechanisms	0	NOCM
Number of Significant IUs	36	SIUS
Number of Categorical IUs	16	CIUS
Technical Evaluation for Local Limits	Y	EVLL
Adoption of Technically-Based Local Limits	Y	ADLL
Significant IUs not inspected or sampled	0	NOIN*
Significant IUs in significant noncompliance with standards or reporting	#1	PSNC*
Significant IUs in significant noncompliance with self-monitoring	0	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	0	SNIN*