

# ADEQ

ARKANSAS  
Department of Environmental Quality

June 30, 2011

Charles Blanton  
Director, EH&S  
Mueller Copper Tube Products, Inc.  
P.O. Box 309  
Wynne, AR 72396

Re: Mueller's (ARP00036; AFIN# 19-00004) Compliance Assurance Visit (CAV)

Dear Mr. Blanton:

Under **40 CFR 403.8(f)(1)(i)**: "[ADEQ is required to] Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by [Mueller], compliance or noncompliance with applicable Pretreatment Standards and Requirements... Representatives of [ADEQ] shall be authorized to enter [the] premises of [Mueller] in which a Discharge source or treatment system is located or in which records are required to be kept under 40 CFR 403.12(o) to assure compliance with Pretreatment Standards..."

Please find attached the completed CAV conducted at your facility on 12/16/10. Apologizes are extended for the tardiness of this report.

Mueller has been regulated under:

- 1) 40 CFR 464.25, the Metal Molding and Casting Point Source Categorical Pretreatment Standards, specifically Subpart B - Copper Casting Subcategory (b) Direct Chill Casting Operations and,
- 2) 40 CFR 468.14, the Copper Forming Point Source Categorical Pretreatment Standards, specifically Subpart A - (c) Drawing Spent Lubricant and (d) Subpart A - Solution Heat Treatment Pretreatment Standards for Existing Sources.

Correspondence from you prior to the CAV indicated Mueller's casting operations had temporarily ceased and were being conducted at your sister facility in Fulton, MS. Compliance with "2" above was calculated using ADEQ sample results gathered during the site visit (see Attachment A-1), your reported October through December '10 production rates of 953,616 off-lbs drawn/day @ 5,300 gpd and 93,438 off-lbs of solution heat treated/day @ 500 gpd.

The two (2) grab samples taken were analyzed by ADEQ's laboratory (see Attachment A-1), averaged and showed compliance with the most stringent "monthly average shall not exceed" pretreatment standards for existing sources in 40 CFR 468.14. All metals analyzed were below the federal guideline limitations. **Mueller is in compliance with the standards in 40 CFR 468.14.**

***Strong Recommendations:***

1) Under **40 CFR 403.12(b)**, “Reporting requirements for industrial users upon effective date of categorical pretreatment standard—baseline [monitoring] report [BMR], Within 180 days after the effective date of a categorical Pretreatment Standard, or 180 days after the final administrative decision made upon a category determination submission under §403.6(a)(4), whichever is later, [Mueller] shall be required to submit to [ADEQ] a report which contains the information listed in paragraphs (b)(1)–(7) of this section. **(3) Description of operations.** [Mueller] shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by [Mueller]. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes.”

The only BMR located in Mueller’s file was dated (signed) by Charles Blanton on 10/29/93 and Rick Palmer on 11/1/93. This BMR briefly described the casting operations only.

While the newer process(es) narrative is included in each of Mueller’s semi-annual reports (see Attachment A-2) are included, they are very general in this office’s opinion. The process narrative should include the characteristics (chemical composition, not “trade names”) of the wastewater generated at each regulated process. What other chemicals are in this regulated process wastewater? Air “emissions” information is of no value. The volume of wastewater generated and what may be in that wastewater was the intent of the above **40 CFR 403.12(b)(3)** requirement.

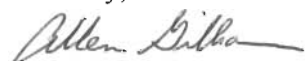
The latest regulated (and non-regulated) wastewater flow schematics (see Attachment A-3) are good, but could include more details to meet the above regulation’s intent. Specifically, the volumes (whether measured or estimated) from each source needs to be included on the schematics. And, as discussed during the site visit, the outside containment/oily water treatment frac and holding tank area needs a separate schematic of the plumbing system. This inspector could not easily visualize the flow scheme even while the system was being described by Mr. Hollowell during the site visit.

Please submit an updated (and dated), more detailed process narrative and wastewater flow schematic with flow estimates within ninety (90) days of the date of this correspondence. Realizing there are wide fluctuations in production, therefore flows, a range of flows may be denoted on the updated schematics from the different sources.

It was a pleasure working with Mr. Hollowell during the facility tour and briefly discussing the compliance assurance visit with you.

If there are further questions or comments, please feel free to contact this office.

Sincerely,



Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

Attachments: Mueller’s CAV; supporting documentation Attachments A-1 through A-3

ec: Don O’Neal, Wynne Wastewater Treatment Plant Manager

E:\NPDES\NPDES\Pretreatment\Reports

<b>I. Summary of Inspection</b>			
<b>A. Inspection and Objective (Complete Before Inspection)</b>			
<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Bi-Annual	<input type="checkbox"/> Spill/Slug	<input type="checkbox"/> Unscheduled
<input type="checkbox"/> New Construction	<input type="checkbox"/> Noncompliance	<input type="checkbox"/> Follow-up	<input type="checkbox"/> Complaint
Inspection Objective(s): Verify compliance with the National Pretreatment Regulations in 40 CFR 403 and the specific categorical limitations in 40 CFRs 464 & 468 per 40 CFR 403.8(f)(2)(v). Facility's Cu casting ops under 40 CFR 464 were not in operation at the time of this site visit.			
Checklist of items to be reviewed and/or visually inspected:			
<input checked="" type="checkbox"/> Pre-inspection Meeting	<input checked="" type="checkbox"/> Pretreatment Process	<input checked="" type="checkbox"/> Safety Concerns	
<input checked="" type="checkbox"/> Process Inspection	<input checked="" type="checkbox"/> Discharge point(s)	<input checked="" type="checkbox"/> Spills/Slug Control Plan	
<input checked="" type="checkbox"/> Chemical Storage	<input type="checkbox"/> RCRA information	<input checked="" type="checkbox"/> Process/Flow/Pretreatment Schematics	
<input checked="" type="checkbox"/> Records Review (Pretreatment)	<input checked="" type="checkbox"/> Flow/pH Meter(s)	<input checked="" type="checkbox"/> Calibration Records	
<input checked="" type="checkbox"/> IU sampling procedures	<input type="checkbox"/> New MSDS	<input type="checkbox"/>	
<input type="checkbox"/> MSDS Inventory List	<input type="checkbox"/>	<input type="checkbox"/>	
Comments: Main contact (Chuck Blanton) was unavailable. Mike Hollowell, Mueller's HazMat Operator and wastewater operator conducted the site visit tour with this inspector. He was very open, cooperative, was extremely knowledgeable about their pretreatment system and familiar with the facility's processes generating wastewater.			
<b>B. Inspection Analysis</b>			
Were there any deficiencies/ <del>violations</del> identified and noted during the inspection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Provide a brief narrative of deficiencies/ <del>violations</del> or other concerns in the following areas:			
Records Review:			
<ol style="list-style-type: none"> <li>Overall process wastewater flow diagram/schematic needs to be updated to reflect ALL of their sources and numerous piping systems' layout. Additional water lines/flows to supplement more efficient pretreatment are not included in the facility's schematic. Mueller is regulated under production based categories and not subject to the use of the combined wastestream formula (CWF) for calculating their equivalent mass to concentration limits. Wastewater flows (volumes) from various regulated vs. non-regulated streams are not delineated.</li> <li>Need to see Mueller's contract lab's (ETC) analytical results page on future semi-annual reports.</li> </ol>			
Process Area(s): Adequate and fairly clean.			
Pretreatment System: Adequate and well maintained with good records.			
Self-Monitoring Procedures: Adequate			
Spill/Slug Control Plan: Not enough time to allow for a comprehensive review of Spill Control Plan. A slug discharge potential from Mueller was deemed negligible.			
Sampling Point: Adequate			
Chemical Storage: Adequate			



### Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not

1. Direct Chill Casting (not casting at time of site visit)	Yes <input type="checkbox"/> No <input type="checkbox"/>	4.	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Drawing Spent Lubricant	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5.	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Solution Heat Treatment	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	6.	Yes <input type="checkbox"/> No <input type="checkbox"/>

Were processes visually inspected? Yes  No  N/A

Brief description of process(es): Processes were already shut down for the day once we finished the initial interview, first sampling event and walk-through of their pretreatment system and chemical storage area. 12" x 80" "logs" are brought in from their "sister" facility located in Fulton, MS. In addition, re-draw material is also obtained from their "sister" facility. (Re-draw has already been extruded and drawn prior to introduction at the Wynne facility.) The logs are cut into 25.5" billets and sent through one of two gas fired billet heaters bringing the temperature to ~1650 °F. The billets are then transferred to the extrusion press which incorporates a solution heat treatment tank with a length of ~205'. Following the heat treatment, the slugs are removed from both ends to create the shell. The shell is then sent through one of two "Schumag" drawing machines followed by other drawing process to achieve the desired size according to customer specs. Once the tube has been drawn to the correct wall and OD, the tube is either cut into straight or coils, again according to customer specs. Hydraulic oil and non-contact cooling water "drippings" from the extrusion press ops are captured in a huge concrete holding sump underneath the unit which is then pumped to pretreatment. Grated floor drains flow to a sump and then pumped to pretreatment. Other non-wastewater ops include straightening and coiling.

General observations of facility's indoor housekeeping: Relatively clean.

General observations of area outside facility's building: Fairly clean and orderly. Quite a few wooden pallets and crates stored outside.

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured estimated. If batch discharged, list frequency and volume (1000 gal/month, e.g.).

<input type="checkbox"/> Process Rinse Overflows	<input checked="" type="checkbox"/> Equip. cleanup w.w. around the Extrusion Press ops drains to a sump, then to pretreatment. Volume not known, but small.	<input checked="" type="checkbox"/> Floor cleanup oils from vacuum "squeegee" are also sent back to sump. Volume not known, but small.	<input type="checkbox"/> Spent Bath Solutions
<input type="checkbox"/> Product Cleaning	<input type="checkbox"/> Forklifts Maint./Wash	<input type="checkbox"/> Tank Dragout	<input type="checkbox"/> Air Pollution Devices
<input type="checkbox"/> Boiler Blowdown	<input type="checkbox"/> Spent Rinse Tanks	<input type="checkbox"/> Equipment Coolants	<input checked="" type="checkbox"/> Non-Contact Cooling Water: Bleed-off is added to city potable water and re-used in process.
<input type="checkbox"/> Stormwater	<input checked="" type="checkbox"/> Solution Heat Treatment w.w. ~500 gpd	<input checked="" type="checkbox"/> Drawing Spent Lube w.w. ~ 5,300 gpd	<input type="checkbox"/>

List Major Raw Materials and Chemicals used:

Copper, graphite powder, hydraulic & lube oils, synthetic coolants/cutting fluids and a small amount of solvents.

<input checked="" type="checkbox"/> BOD (for city)	<input type="checkbox"/> CN <sup>-</sup>	<input checked="" type="checkbox"/> Metals (List)	<input type="checkbox"/> Solvents/TTO (List)
<input checked="" type="checkbox"/> TSS ( " )	<input type="checkbox"/> Cl <sub>2</sub>	Cr, Cu, Pb, Ni & Zn	Facility chose the O&G alternative under CFR 468
<input checked="" type="checkbox"/> O&G (alternative)	<input type="checkbox"/> S <sup>-</sup>		
<input checked="" type="checkbox"/> pH	<input type="checkbox"/>		

Are there floor drains in the Process area?  Yes  No If yes list number and the location of all floor drains:





**Attachment B: Pollution Prevention (P2) / Recycling Activities**

Does the facility have a written P2 Plan? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Does this facility practice P2? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> "to a degree"	
Environmental Management System in place? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
ISO Certified? ISO 9001 Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Written Standard Operating Procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Every process station has a written employee SOP.	
Preventative Maintenance Program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (hydraulic systems, valves, pumps, etc)	
Explain: Scheduled PM is done on different machinery at different times.	
Water Reuse: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Non-contact cooling water bleed-off is added to City water for re-use in their processes and pretreatment.	
Cost Accounting to Track Savings: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain: "Corporate may have this."	
Inventory Control / "Green Purchasing": Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (lean manufacturing/"env. friendly purchasing", etc)	
Explain:	
Employee Training: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Different "station" operators receive SOPs to review periodically.	
Spent Solvent Reclamation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Onsite reclamation of aliphatic hydrocarbons. They recover about 80% of their solvents for re-use.	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: 3 <sup>rd</sup> party source recycles pallets and corrugated boxes.	
Recycle Waste Oil, Solvents, and Lubricants? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Waste lubricants sent back to manufacturer for recycling.	
Other Activities	
P2 Equipment/Practices in use:	
<input checked="" type="checkbox"/> Overflow Alarms (in pretreatment room)	<input type="checkbox"/> Aqueous Cleaning Solutions
<input type="checkbox"/> Fog Spray Rinsing	<input type="checkbox"/> Countercurrent Rinsing
<input type="checkbox"/> Dragout Collection Trays	<input type="checkbox"/> Seal-Less Pumps
<input type="checkbox"/> Air Jets to Blow Parts Dry	<input checked="" type="checkbox"/> Secondary Containment of Process Solutions
<input type="checkbox"/> Aqueous Paint Stripping Solutions	<input type="checkbox"/> Bead Blasting to Remove Paint
<input checked="" type="checkbox"/> Water Soluble Cutting Fluids (for sawing "logs" and tube lengths)	<input type="checkbox"/> Recycle Overspray
<input type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input type="checkbox"/> Conductivity Meters
<input type="checkbox"/> Dead Rinse Tanks	<input checked="" type="checkbox"/> Bath / Rinse Filtration

**Attachment C: Pretreatment System**

Are wastestreams segregated before pretreatment?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Are they pretreated prior to discharge to the sanitary sewer?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Was the pretreatment system visually inspected during this visit?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:				
<input type="checkbox"/> Dissolved air floatation	<input type="checkbox"/> Membrane Tech.	<input type="checkbox"/> Ion Exchange	<input type="checkbox"/> Biological Treatment	
<input type="checkbox"/> Centrifugation	<input checked="" type="checkbox"/> Flow Equalization	<input type="checkbox"/> Ozonation	<input type="checkbox"/> Chlorinating	
<input checked="" type="checkbox"/> Chemical Precipitation	<input type="checkbox"/> Oil/Water Separation	<input type="checkbox"/> Reverse Osmosis	<input type="checkbox"/> Grit Removal	
<input checked="" type="checkbox"/> Sludge Filter Press	<input type="checkbox"/> Grease Trap	<input type="checkbox"/> Screen	<input checked="" type="checkbox"/> Solvent Distillation	
<input checked="" type="checkbox"/> pH Adjustment	<input type="checkbox"/> Sand Trap	<input checked="" type="checkbox"/> Sedimentation (clarifier)	<input type="checkbox"/> Silver Recovery	
<input checked="" type="checkbox"/> "Rope" & Floating Oil Skimmers	<input checked="" type="checkbox"/> Clarification	<input type="checkbox"/>	<input type="checkbox"/>	
<p>Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order): Appeared clean and operational with no rusting or unstable parts or braces. Typical chemical precipitation system with Ferric Chloride added automatically to a 1,000 gal tank to drop the pH (~3.1 s.u.), then gravity flows to another tank where caustic (hydrated lime) is added to automatically adjust the pH (~7.1 s.u.) up to precipitate metals. Wastestream is then sent to a holding tank from which it is pumped through a clarifier (where polymers are injected to help "floc" drop out) with supernatant discharged to city. System is set up with an automatic shut-down for the pretreatment system if a specified range is above or below their pre-set pH range. "Sludge" is sent from the clarifier to a sludge holding tank (2,600 gallons), then sent to a filter press w/supernatant sent back to a floor sump (then back through pretreatment). Distillation of solvents for re-use is also accomplished in this "pretreatment room" by an outside company. Out of about 4,000 gal/2 days, solvents are distilled reclaiming about ~80% w/the used oil ("still bottoms") sent off-site. City water (~3,000 gpd) and cooling tower bleed-off (not measurable) is added to help aid in separation of the oil and to help in the floc process since casting ops (and its related wastewater) were shut down. Outside/uncovered (4) frac and other holding tanks are part of a closed-loop cooling system. Secondary containment walls are ~6' tall around the entire area. Floating oil skimmers are used in all of the outside frac and holding tanks.</p>				
Does the description match the schematic currently on file?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
The entire wastewater flow schematic to pretreatment needs to be updated to include outside holding/recycling tanks and oil removal system.				
System Operator(s) Name: Mike Hollowell				
Does discharge permit require licensed operator?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Is the System Operator(s) licensed by the State of Arkansas?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
List Name(s) and License classification: Mike Hollowell has his Class II Municipal and Advanced Industrial Wastewater Operator's licenses. Two other employees are HazMat certified who help Mike Hollowell with the chemicals' handling/storage.				
Is training provided to the Pretreatment System Operator(s)?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
If Yes, list type and frequency: 24 hrs /2 years from ADEQ training classes.				
Is the discharge from the Pretreatment System?		<input checked="" type="checkbox"/> Batch	<input type="checkbox"/> Continuous	<input type="checkbox"/> Combination
If any discharges are batch type or combination, describe the following:				
Volume of each batch flow: Depending on production/flow rates, the pretreatment system is only required 8 to 10 hrs per day (5 days/week) averaging ~5,800 gpd.				
Describe process from which batch originated (spent bath, e.g.): Drawing spent lubricant, extrusion press leakage and heat treatment solution wastewater.				
Approximate duration of batch discharge: See above.				
Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading):		
Ultra-sonic	"Zero out" daily	Use of a tape measure to compare to chart's flow.		



**Attachment D: Chemical Storage Area(s)**

Does the facility have a designated chemical storage area(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Was this area(s) visually inspected? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. Most bulk chemicals, waste/new oil & solvents are stored outside, bermed & under cover.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Sump <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
2. Other small quantities of chemicals are kept next to the stations they are used at and are on self-contained "spill pallets".	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
3. Pretreatment building has Ferric Chloride, water softener and scale remover for air stripper.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
<input checked="" type="checkbox"/> Dikes, Berms for Containment	<input type="checkbox"/> Plugs for Floor Drains	
<input checked="" type="checkbox"/> Secondary Tanks for Holding	<input type="checkbox"/> Premix (low) Concentrations	
<input type="checkbox"/> Alarms	<input type="checkbox"/> Chain restraints, limited access	
<input checked="" type="checkbox"/> Spills Control Kits for Cleanup	<input checked="" type="checkbox"/> Notification Procedures	
<input checked="" type="checkbox"/> Chemical desegregation within Storage Area	<input type="checkbox"/> Other	
Chemical Inventory List (MSDS) on file? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Were any new MSDS reviewed during the Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <i>No time for review</i>		
If yes, list below: <i>No time for review</i>		
Chemical storage comments: All of the facility's flammables (solvents, draw lubricants, hydraulic oils, etc.) are stored outside. They're self-contained and covered.		
Chemical handling procedures (totes, dolly, buckets, hardline, etc): Forklifts, barrel dollies and fireproof 5 gallon safety cans.		

**Attachment E: Spill/Slug Control Plan**

Does the facility have a Spill/Slug control plan? <i>Slug discharge potential deemed negligible.</i>	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(A) Describes discharge practices including non routine batch (slug) discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(B) Describes storage and handling of chemicals	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(C) Procedures for immediate notification to POTW of slug discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants – HazMat training	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
2. Describes procedures and equipment for emergency response – Not evident	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
3. Describes follow-up to limit damage suffered by POTW or environment – Not evident	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted? – Not evident	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
Is it posted in areas where chemicals are used and stored? – Not evident	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
Has there been any non-routine, episodic discharges or chemical spills in the past year?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? <input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A	
<b>Visual Inspection of Discharge Lines/Points</b>	
Provide description of <del>manhole condition and</del> flow channel of the following where applicable:	
Sampling / Monitoring Point: Very adequate, just below the Parshall Flume in "Pretreatment room".	
Total Flow Monitoring Point: same place with an ultra-sonic flow meter.	
Upstream Manhole: N/A	
Point of Connection: same	

### Attachment F: Self-Monitoring

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title. Pre-preserved bottles are shipped to facility. The pretreatment operator places teflon tube and strainer just below the Parshall Flume. SIGMA 900 Mac sampler is "iced". Samples are then placed on ice, sealed within an insulated "cooler" and shipped to a certified lab for results. They also use a calibrated ultra-sonic flow meter with a totalizer. Calibration of flow meter is nothing simpler than using a tape measure to measure depth to make sure the ultra-sonic flow meter is "reading" depths (in inches) correctly. If not, Mike Hollowell, the main pretreatment operator adjusts the flow meter accordingly.

Where is the sample point located?

<input type="checkbox"/> End of Process	<input checked="" type="checkbox"/> Pretreatment Effluent	<input type="checkbox"/> Total Flow
<input type="checkbox"/> Combined Flow	<input type="checkbox"/> Metered Flow	<input type="checkbox"/> Flow Actuator
<input type="checkbox"/> Private Manhole	<input type="checkbox"/> Utility Manhole	<input checked="" type="checkbox"/> Advance Notice Required
<input type="checkbox"/> Safety Hazards Identified	<input type="checkbox"/>	<input type="checkbox"/>

Is the Sample Collection Site Adequate?  Yes  No  N/A

Does the facility rep. request a split sample on this sampling/inspection?  Yes  No

Does the facility perform self-monitoring tests in-house?  Yes  No  N/A

If no, record the name and address of Contract Lab: Environmental Testing Group, 1702 E Central Avenue, Bentonville, AR

*Need to see ETC's analytical results page on future semi-annual reports.*

Automatic Sampler  or Manual

IU Self-Monitoring Results reviewed: *[ETC's analyticals were not available]*  Yes  No  N/A

Is the Contract Lab certified by ADEQ for test parameters?  Yes  No  N/A

Dates and Times of Sample Analysis Recorded? *[Couldn't locate C of Cs]*  Yes  No  N/A

Correct Methods Used for Test Analysis (Refer To 40CFR Part 136) *[“]*  Yes  No  N/A

EPA recommended holding times being met (Refer to 40CFR Part 136) *[“]*  Yes  No  N/A

Chain of Custody Records for Self-Monitoring Samples Reviewed *[“]*  Yes  No  N/A

Were correct Sample Types Collected *[“]*  Yes  No  N/A

Dates and times of Sample Collection Recorded? *[“]*  Yes  No  N/A

Were Samples preserved correctly (refer to 40CFR Part 136) *[“]*  Yes  No  N/A

Were Self Monitoring records on file for past 3 years? *Couldn't locate*  Yes  No  N/A

List the parameters the facility monitors and the frequency: Monthly for the City, Semi-Annually for ADEQ

<input checked="" type="checkbox"/> Zn(t)	<input checked="" type="checkbox"/> Cu(t)	<input checked="" type="checkbox"/> Cr(t)	<input checked="" type="checkbox"/> Ni(t)	<input checked="" type="checkbox"/> Pb(t)
<input checked="" type="checkbox"/> BOD5 (for city)	<input checked="" type="checkbox"/> TSS (for City)	<input checked="" type="checkbox"/> pH	<input checked="" type="checkbox"/> O&G alternative	<input type="checkbox"/> CN(a-c)



A-1

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr  
Ruehr@adeq.state.ar.us  
501-682-0955

**Client:** Special Samples  
**Lab ID:** 2010-3887  
**Client Sample ID:** Parshall Flume (Below)  
**Collection Date:** 12/16/2010 8:35:00 AM  
**Matrix:** Water

**Analyses**  
Total Metals by EPA 200.8

EPA 200.8

Batch: 11010310 Run: 1

	<u>Result</u>	<u>Reporting</u>	<u>MDL</u>	<u>Qual</u>	<u>Unit</u>
Aluminum	<20.0*	20.0	20		ug/L
Antimony	<10.0*	10.0	5		ug/L
Arsenic	<1.00*	1.00	0.5		ug/L
Barium	<10.0*	10.0	2.0		ug/L
Beryllium	<0.5*	0.5	0.1		ug/L
Boron	58.8*	25.0	5.0		ug/L
Cadmium	<1.00*	1.00	0.3		ug/L
Calcium	223*	0.04	0.04		mg/L
Chromium	1.66*	1.00	0.3		ug/L
Cobalt	9.44*	1.00	0.5		ug/L
Copper	36.8*	1.00	0.5		ug/L
Iron	12200*	20.0	10.0		ug/L
Lead	<1.00*	1.00	0.1		ug/L
Magnesium	3.76*	0.1	0.1		mg/L
Manganese	880*	1.0	0.2		ug/L
Nickel	140*	2.5	0.5		ug/L
Potassium	3.78*	1.00	0.05		mg/L
Selenium	<2.00*	2.00	0.5		ug/L
Silver	<5.00*	5.00	1.0		ug/L
Sodium	72.0*	0.04	0.02		mg/L
Thallium	<2.5*	2.5	0.05		ug/L
Vanadium	<2.5*	2.5	1.0		ug/L
Zinc	7.17*	3.00	2.0		ug/L

Dilution Factor: 1.0  
Analyzed By: Joe Semberski  
Analysis Date/Time: Dec 30 2010 12:24PM  
Prep By:  
Prep Date/Time:

A-1

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr  
Ruehr@adeq.state.ar.us  
501-682-0955

**Client:** Special Samples      **Client Sample ID:** Parshall Flume  
**Lab ID:** 2010-3888      **Collection Date:** 12/16/2010 11:50:00 AM  
**Matrix:** Water

**Analyses**

**Total Metals by EPA 200.8**      EPA 200.8      **Batch: 11010310**      **Run: 1**

	<b>Result</b>	<b>Reporting</b>	<b>MDL</b>	<b>Qual</b>	<b>Unit</b>
Aluminum	<20.0*	20.0	20		ug/L
Antimony	<10.0*	10.0	5		ug/L
Arsenic	<1.00*	1.00	0.5		ug/L
Barium	<10.0*	10.0	2.0		ug/L
Beryllium	<0.5*	0.5	0.1		ug/L
Boron	46.4*	25.0	5.0		ug/L
Cadmium	<1.00*	1.00	0.3		ug/L
Calcium	193*	0.04	0.04		mg/L
Chromium	3.09*	1.00	0.3		ug/L
Cobalt	5.67*	1.00	0.5		ug/L
Copper	59.0*	1.00	0.5		ug/L
Iron	3850*	20.0	10.0		ug/L
Lead	<1.00*	1.00	0.1		ug/L
Magnesium	3.61*	0.1	0.1		mg/L
Manganese	740*	1.0	0.2		ug/L
Nickel	70*	2.5	0.5		ug/L
Potassium	3.25*	1.00	0.05		mg/L
Selenium	<2.00*	2.00	0.5		ug/L
Silver	<5.00*	5.00	1.0		ug/L
Sodium	87.7*	0.04	0.02		mg/L
Thallium	<2.5*	2.5	0.05		ug/L
Vanadium	<2.5*	2.5	1.0		ug/L
Zinc	5.97*	3.00	2.0		ug/L
Dilution Factor	1.0				
Analized By	Joe Semberski				
Analysis Date/Time	Dec 30 2010 12:49PM				
Prep By					
Prep Date/Time					



A-1

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr  
Ruehr@adeq.state.ar.us  
501-682-0955

**Client:** Special Samples      **Client Sample ID:** Parshall Flume (Below)  
**Lab ID:** 2010-3887      **Collection Date:** 12/16/2010 8:35:00 AM  
**Matrix:** Water

**Analyses**

**Oil and Grease**

EPA1664

Batch: 10122201      Run: 1

	<b>Reporting</b>	<b>MDL</b>	<b>Qual</b>	<b>Unit</b>
Oil and Grease	1.4	1.4		mg/L
Dilution Factor				
Analyzed By				
Analysis Date/Time				

9.5\*  
1.0  
Robert Graddy  
12/22/2010 0900

A-1

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr  
Ruehr@adeq.state.ar.us  
501-682-0955

**Client:** Special Samples      **Client Sample ID:** Parshall Flume  
**Lab ID:** 2010-3888      **Collection Date:** 12/16/2010 11:50:00 AM  
**Matrix:** Water

**Analyses**

	<b>EPA1664</b>	<b>Batch: 10122201</b>	<b>Run: 1</b>	
	<b>Result</b>	<b>Reporting</b>	<b>MDL</b>	<b>Qual</b>
				<b>Unit</b>
Oil and Grease	8.6*	1.4	1.4	mg/L
Dilution Factor	1.0			
Analyzed By	Robert Graddy			
Analysis Date/Time	12/22/2010 0900			

*Attachment A-2*

(7) GENERAL COMMENTS

Facility Permits:	Permit #	Expiration Date
Air	1027-AOP-R7	6/14/2014
NPDES	ARR0049476	2/28/2013
Stormwater	ARR00A658	6/30/2014

Process Description

Mueller Copper Tube Products, Inc. (formerly Halstead Metal Products) owns and operates a copper tubing manufacturing facility located at 1525 North Falls Boulevard in Wynne, Arkansas. This facility accepts copper from a number of sources. It heats, melts, and forms the copper into high purity logs, which are used as the starting material for the copper tubing manufactured on-site.

The manufacturing process begins with the melting of scrap and virgin copper to produce copper suitable for Mueller's production specifications. The material is placed into an electric arc furnace and heated to approximately 2150°F with a maximum temperature of 2250°F. The casting utilizes Direct Chill Casting and is regulated under 40 CFR 464.25(b). Particulate emissions from the furnace are controlled by a ten-compartment Wheelabrator baghouse. Emissions that escape the furnace during loading/processing and start-up activities exit through the plant ventilation system. PLEASE NOTE THE CASTING OPERATION HAS BEEN SIGNIFICANTLY REDUCED DUE TO MARKET CONDITIONS. EXCEPT FOR SIX (6) WEEKS IN 2010, THE CASTING FACILITY DID NOT OPERATE DUE TO CURRENT MARKET CONDITIONS. THE CASTING OPERATIONS WERE TEMPORARILY RESUMED IN MAY 2011, BUT ARE NOT EXPECTED TO CONTINUE BEYOND AUGUST 2011

Molten copper from the furnace is cast into copper logs (billets). These logs are 24 feet long and 0.92 feet in diameter. Billet logs are also received from Mueller's Fulton, MS facility. Logs are cut into 25.5 inch long billets for further processing. The billets are then heated between 1500 - 1650°F in one of two billet heaters before being placed into the extrusion press. The billet is then extruded in order to form a tube. Emissions generated during this process (insignificant activity) exit through the plant ventilation system to the outside atmosphere. The process utilizes Solution Heat Treatment and subsequently falls under 40 CFR 468.14(d)

The facility also receives incoming metal via re-draw which has been extruded and drawn for some number of draws. The metal is then placed into production for final drawing.

The tubing manufacturing process consists of sawing, drawing, straightening, coiling, and annealing. The annealing furnace heats the tubing in a non-oxidizing environment so that the formation of copper oxide is kept to a minimum and the copper exits the annealing oven bright and shiny. Miscellaneous operations at this facility consist of scrap metal baling, standby power generation, and maintenance operations. These processes is subject to 40 CFR 468.14(c).

(8) SIGNATORY REQUIREMENTS [40CFR 403.120]

I certify under penalty of law that I have personally examined and am familiar with the information in this semi-annual compliance report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Charles Blanton



NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

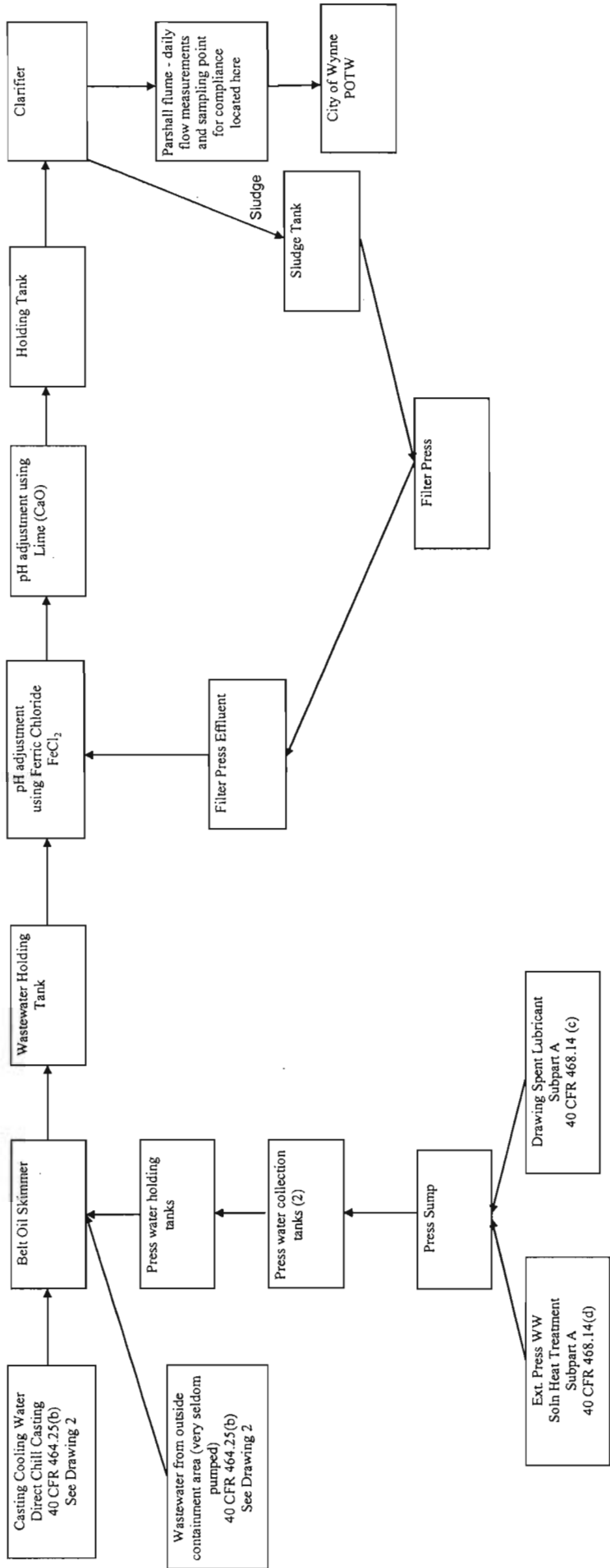
Corporate Dir EH&S

OFFICIAL TITLE

6/29/2011

DATE SIGNED

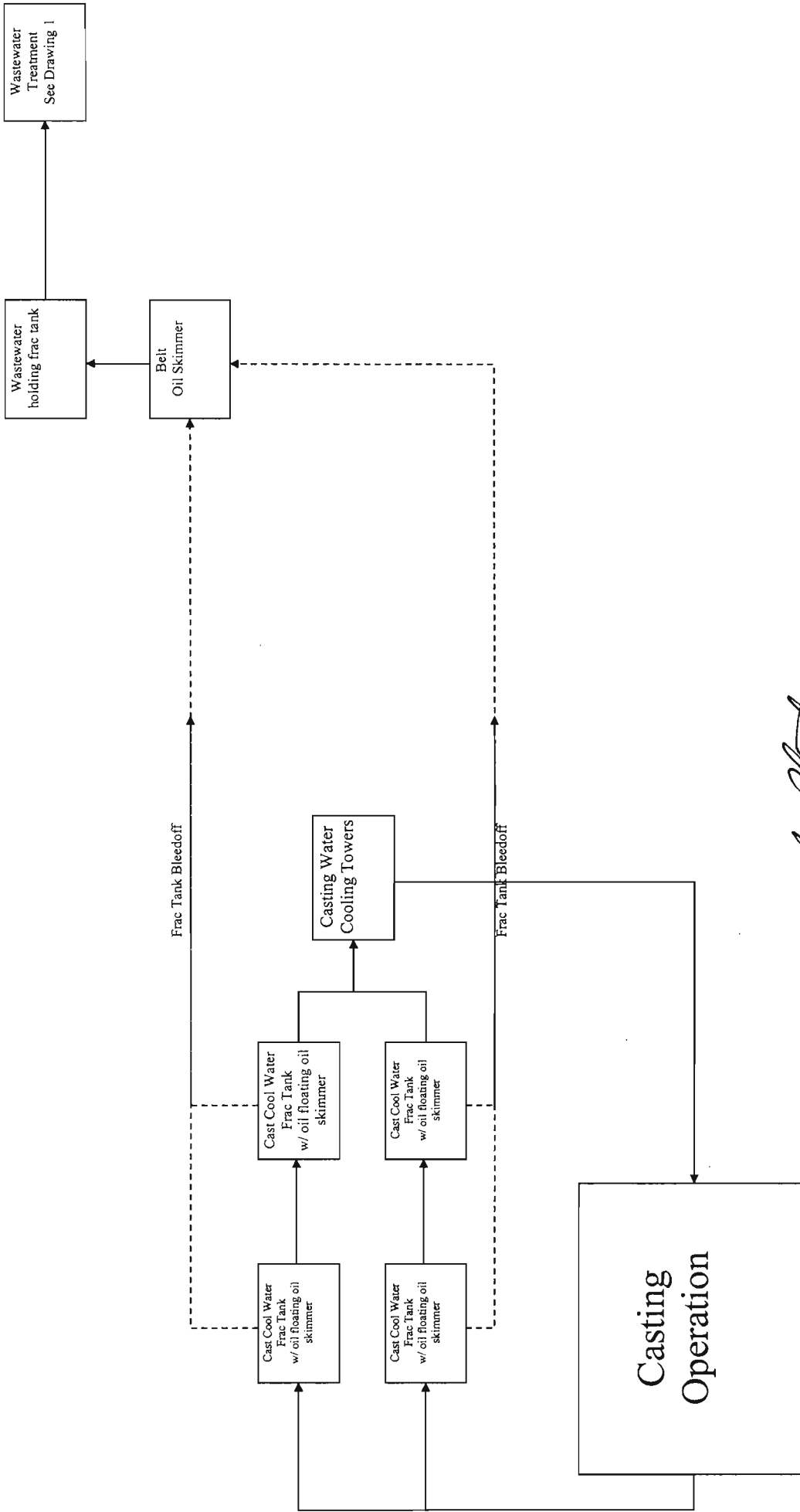
*Attachment A-3*



*Charles B Blanton*  
*6-11-10*

A-3

\\wyn10001\Public\Wynne Common\LAB\Environmental Files\Water Files\BMR Water and Production Data December 2009 thru May 2010



Charles B. Blanton

6-11-10