ADEQ

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

MAY 12 2014

John Rimmer
West Memphis Utility General Manager
P.O. Box 1868
West Memphis, AR 72301

Re: City of West Memphis (NPDES #AR0022039; AFIN #1800879) Pretreatment Program Audit/Municipal Pollution Prevention Assessment

Dear Mr. Rimmer,

Please find enclosed the finished report for the audit/assessment conducted March 11th through March 13th, 2014. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the findings.

Please respond to the required actions and recommendations in writing within thirty (30) days from the date on this correspondence. The response should outline the steps and schedule in which the City can reasonably address/correct deficiencies and/or required actions.

Many of the audit/assessment recommendations are meant to aide your Program further achieve the Clean Water Act's (CWA) objectives to eliminate discharge of pollutants to the environment. The National Pretreatment Program is the CWA's compliment to help protect publicly owned treatment works with value added by implementing a Pollution Prevention program.

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

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

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist and Supporting Documents

ec: Craig Uyeda/NPDES Enforcement Branch Manager
Jason Bolenbaugh/NPDES Inspector Supervisor
Rudy Molina/EPA 6WQ-PP

E/NPDES/NPDES/Pretreatment/Reports

PRETREATMENT PROGRAM AUDIT /

POLLUTION PREVENTION ASSESSMENT

CITY OF WEST MEMPHIS, ARKANSAS

NPDES PERMIT #AR0022039

May 7, 2014

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, the department will perform audits to coordinate pretreatment programs within the state. Audits are an important part of the department's 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.

The audit/assessment was performed on the City's Pretreatment Program March 11th through March 13th, 2014 on the Pretreatment Program implemented by the City of West Memphis, Arkansas. Participants included:

Allen Gilliam	ADEQ Pretreatment Engineer
Denise Bosnick	City Director of Environmental Quality
Marvin Jones	City Lab Supervisor
Tina Cooper	City GIS Operator
John Rimmer	City Utility Commission, General Manager (Exit Interview)

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of West Memphis' 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

EPA originally approved the West Memphis Pretreatment Program on 4/5/86. The Program was modified again on 1/11/96, approved and incorporated by reference into the City NPDES permit. Those modifications included the headworks loading evaluation to demonstrate that Technically

Based Local Limits weren't necessary, incorporation of an enforcement response plan and revisions to the Pretreatment Ordinance and Program narrative. The latest revisions to the City's Pretreatment Program included the required "Streamlining" revisions to the Federal Pretreatment Regulations in 40 CFR 403. They were submitted, reviewed, approved by ADEQ on 1/16/13 and incorporated by reference into the City's NPDES permit.

The City's wastewater treatment plant has a design flow of 6.3 MGD and consists of a bar screen, oxidation ditches, clarifier, UV disinfection with a sludge belt press. The POTW receives approximately 0.7 MGD from four (4) categorical industrial users. The POTW disposes about 730 dry tons of sludge per year to a local landfill. The POTW discharges an average 4.6 MGD to the Mississippi River with no apparent toxicity problems.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to three (3) categorical industrial users and one (1) site visit to a business to verify it was not a significant industrial user subject the City's Pretreatment Program. The fourth categorical user's operations were shut down due to reconstruction of the facility's roof after a recent ice storm. 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 Attachments A-1 through A-5.

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 West Memphis. Section C includes recommendations to help improve the implementation and enforcement of the 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 Clarksville=s Pretreatment Program. Actions required by the City to comply with the current 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.

1) Under ***40 CFR 403.8(f)(2)(i)***, "[The City will] Identify and locate all possible Industrial Users (IUs) which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request…"

a) During the interview with the City's Director of Environmental Quality (DEQ) it was stated a comprehensive industrial/non-domestic user survey had not been conducted in many years. No compilation could be produced showing what had been accomplished in the past.
The City must conduct these IU surveys at an adequate frequency to determine if any new non-domestic users may be subject to their Pretreatment Program. While the frequency of these surveys is not specified in the regulations it was suggested to conduct one every five (5) years.

b) The City must have a compilation or index available for review upon request. This compilation should include the most pertinent information discerned from each IU survey form. During the audit it was suggested to build a database in which all non-domestic users' pertinent information could be seen vs. a pile of surveys with information scattered throughout.

2) Under ***40 CFR 403.8(f)(1)(B)*** , "...individual...control mechanisms ...must contain...***(3)*** Effluent limits, including...based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;

During the file review it was discovered Stateside Steel (SS) had been mis-categorized as a Metal Finisher under 40 CFR 433 as its permit reflected 40 CFR 433.17 standards (See Attch. A-4b). Its permit application, fact sheet and inspection information provided supporting information that it is covered under the effluent guideline of the Iron and Steel Manufacturing Point Source category in 40 CFR 420, Subpart D – Steelmaking Subcategory.

The City must revise SS's permit to reflect its appropriate category's standards.

3) Under ***40 CFR 403.12(e)*** *Periodic reports on continued compliance.* (1) Any Industrial User subject to a categorical Pretreatment Standard...shall submit to...[the City] during the months of June and December, unless required more frequently...a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical Pretreatment Standards. In addition, this report shall include a record of measured or estimated average and maximum daily flows for the reporting period for the Discharge reported in paragraph (b)(4) of this section except that the [City] may require more detailed reporting of flows." And under ***40 CFR 403.12(g)***, "*Monitoring and analysis to demonstrate continued compliance*...This sampling and analysis may be performed by the [City] in lieu of the Industrial User..."

a) It was indicated by the City's Pretreatment personnel all SIU flows were based on water usage records, nothing submitted by their permitted facilities. The City must require accurate, verifiable regulated and non-regulated flow measurements from their permitted SIUs whether that be through flow measuring devices or some verifiable means (a five gallon bucket and stop-watch is acceptable).

b) This requirement must also be included as a reporting requirement in each of the City's SIU permits.

4) Under the **City's 1/16/13 Approved Pretreatment Program, Appendix J – Enforcement Response Plan's [ERP] Enforcement Plan Guide**, responses for a Discharge Limit Violation consists of an "Informal notice (verbal and written)" or an "NOV [notice of violation] and/or Fine".

a) It was discovered during the file review and communications with the City's Pretreatment Coordinator (Director) none of these practices were being followed. No written records of communications (ROC) or NOVs could be located for the City's past Pretreatment year's

permitted SIUs' limit violations. The City must follow its own ERP.
b) Because Automated Conveyor Systems (ACS) discharges approximately once per year and meets the significant non-compliance criteria in 40 CFR 403.8(f)(viii) almost yearly for either Zn, Cu or oil & grease the City must take escalated enforcement actions. It does not appear the City is following its own ERP.

5) Under ***40 CFR 403.8(f)(2)(vi)***, "Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges." And Under the **City's 1/16/13 Approved Pretreatment Program, Pretreatment Ordinance #2187, Section 3.3 Accidental Discharge/Slug Discharge Control Plans**" it states "At least once every two (2) years, the Director shall evaluate whether each SIU needs...a plan or other action to control Slug discharges."

a) From the file review and conversations with Pretreatment Coordinator (Director), all permitted SIUs were just required to develop and submit a slug discharge plan whether one was necessary or not. No documentation of slug control discharge evaluations could be discovered.

b) No documentation of slug discharge evaluations could be produced indicating the City's permitted industries were being evaluated once every two years.

The City must conduct legitimate slug discharge potential evaluations and document whether any of its SIUs are required to develop and implement a slug discharge control plan.

The City must either conduct and document these every two years (per its own Ordinance provisions) or non-substantially revise its Program to correct its Ordinance language to reflect the language in EPA's Model Ordinance.

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

1) Strongly recommend revising Ordinance 2187, Section 3.3's requirement to conduct slug discharge evaluations once every two years to reflect the language in EPA's Model Ordinance (1/07), Section 3.3. This would be considered a non-substantial modification under 40 CFR 403.18.

2) Recommend revising the City's Pretreatment Program, Section 4.1 to specify that non-domestic discharge surveys will be conducted once every five years. The section should be more specific as to how these surveys will be conducted whether sent by USPS mail or hand delivered, identify the source(s) of those to be surveyed and how the survey will be compiled into a digested version containing the most pertinent information from them.

3. Recommend beefing up current industrial inspections with more narrative answers to questions regarding 1) chemical handling procedures; 2) operation and maintenance of process and pretreatment equipment (rusting, leaking, cracked welds, etc.); 3) specific pollution prevention

activities (Grace and Quala's pollution management practices [on-file] are good examples to cite) and 4) general cleanliness of the entire process/manufacturing/pretreatment areas.
4. Recommend including Pollution Prevention (P2) questions on these non-domestic user surveys. This should at least stimulate questions about what P2 actually is.

5. Recommend issuing some form of a control mechanism to all liquid waste haulers with the exact discharge point described in that document. The general and specific prohibitions from 40 CFR 403.5(a)&(b) along with a signed certification statement that no hazardous waste has or will be discharged into the City's collection system should be included. A formal manifest system should be developed indicating source of collection (address, name and time collected, e.g.) should also be included on the manifest signed by the driver.

6. Recommend including on all industries' permit limits page the type of sampling to be conducted per parameter whether that be by grab or composite. A definition of both should also be included in Part III of all industry permits. Since the City is conducting all the sampling for its permitted facilities and they are either grab or "timed" composites, not flow proportioned composites, this should be specified as the definition of "composite sampling". If any of the City's permitted industries wished to sample their own regulated wastewater, there would be no confusion as to what type of composites should be taken.

7. As time allows, continue to send more fliers out with water/sewer bills letting the public know of the proper disposal methods of grease, unused/expired pharmaceuticals and non-dispersible "flushable wipes".

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

Under ***40 CFR 403.5(c)(1)***, "...[West Memphis]...shall continue to develop these limits as necessary and effectively enforce such limits." Or per ***40 CFR 403.8(f)(4)***, "[West Memphis] shall develop local limits as required in §403.5(c)(1), or demonstrate that they are not necessary."

The City must provide an evaluation of the need for technically based local limits (TBLLs) or a demonstration they are not necessary. This evaluation or demonstration has historically been included in a City's Pretreatment Program although some have made it a stand-alone document. Regardless, West Memphis' evaluation or demonstration could not be produced and must be provided.

****

The City should consider the required actions and recommendations contained in this audit/assessment before finalizing any pretreatment program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, should be submitted to ADEQ for review and approval.

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: West Memphis Utility Comm. NPDES #: AR0022039
Mailing address: P.O. Box 1868, 604 East Cooper, West Memphis 72301

Permit Signatory: John Rimmer Title: General Manager

Telephone: 870.735.3355 FAX NUMBER: 870.732.7623

Pretreatment Contact: Denise Bosnick Title: Dir. of Env. Quality
Address: Same
Telephone: 870.702.5141
e-mail: dbosnick@westmemphisutilities.com

Pretreatment program approval date: 4/5/86

Dates of approval of any non-substantial (Streamlining) modifications: 1/16/13

Month Annual Pretreatment Report Due: April

Pretreatment Year Dates: 3/1 - 2/28 Date(s) of Audit: 3/11 - 13/14 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Denise Bosnick	Director of Env. Quality	Same
Marvin Jones	Lab. Supervisor	870.702.5151
Tina Cooper	GIS Operator	702.5144
John Rimmer	General Mgr. (exit interview)	Same

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	12/11	Quala Wash's inadequate sampling pt., tanker contents were drained on ground & drain valve was open on secondary cont. to outdoor holding tank. ATM Oil/Jim's Tank Serv. discharged leachate into the City's collection system. W.W. from Marion was hauled by truck & discharged into a MH. Samples were taken from bottom of tanker, not where the oil was present.

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?

. . . . . .

The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with a asterisk or footnote that tells that there is more explanatory information and where it can be found.

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMIT/TREATMENT PLANT:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR0022039	West Memphis	8/1/13	7/31/18

2. Individual Treatment Plant Information

a. Name of Treatment Plant: West Memphis
Location Address: 502 South Loop

Expiration Date of NPDES Permit: Same

Treatment Plant Wastewater Flow: Design- 6.3 MGD; Actual (Average)- 4.6 MGD (5.1 in '13)

Sewer System: 100 % Separate; # of SSOs due to grease blockages: 11

Industrial Contribution to this Treatment Plant *(based on 2012 data)*

# of SIUs: 4 # of CIUs: 4
Industrial Flow (mgd): 0.276 Industrial Flow (%): 16 %

Level of Treatment		Type of Process(es):
Primary		
Secondary	✓	oxidation ditches; clarifier
Tertiary		and sludge belt press

Method of Disinfection: UV

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Mississippi River

Receiving Stream Classification: Seq. 6C/Mississippi Riv. Basin

Receiving Stream Use: Primary/secondary contact, raw water source for domestic, industrial and AG uses, propagation of desirable species of fish.

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

Method of Sludge Disposal:		Quantity of Sludge:
____	Land Application	____ dry tons/yr.
____	Incineration	____ dry tons/yr.
____	Monofill	____ dry tons/yr.
✓	Mun. Solid Waste Landfill*	730 dry tons/yr.
____	Public Distribution	____ dry tons/yr.
____	Lagoon Storage	____ dry tons/yr.
____	Other (specify)	____ dry tons/yr.

* *Crittenden County Landfill*

List of toxic pollutant limits in NPDES permit: Conventionals, WET (Acute), T.Phos, Nitrate + Nitrite Nitrogen

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for West Memphis 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: n/a
Issuance Date: _____
Expiration Date: _____

List pollutants that are specified in current sludge permit:
n/a

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. (e.g. Is there an ongoing TRE?) _____

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	1	
Priority **	1	1		
Biomonitoring		4		
TCLP			1	
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.
All stayed about the same

YES NO N/A

___ ✓ ___ Has the POTW begun tracking the trends in the above samples?

___ ✓ ___ Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated	Cause(s)
n/a	

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	
✓		Has public comment been solicited during revisions to the Sewer use ordinance ~~and/or local limits~~ since the last program modification? [403.5(c)(3)]
✓		Have any non-substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below. Complete revisions of City's Pretreatment Program to be consistent with the Streamlining revisions to CFR 403.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
1/16/13	See above. Ordinance #s 2187 & 2266	2/1/13

2. Modifications in Progress: N/A

Date Requested	Nature of Modification
None	

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: 4/5/86
Date of most recent Ordinance approved by the Control authority: 1/6/11
Date of most recent Pretreatment Program modification approval: 1/16/13

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

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

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

___n/a___ Have provisions been made for the incorporation of Pollution Prevention (P^2) policies by contributing jurisdictions?

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.				

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

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

Briefly describe other problems: _____

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
None		___	___
		___	___

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)] *Pretreatment contact couldn't remember when the last one was done, but has a standard form ready to send out now.*
___	✓	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)]
n/a		If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2 reference materials to the IUs which qualify?

What methods are used to update the IWS:

___ Review of newspaper/phone book
✓ Review of plumbing/building permits
✓ Review of water billing records
✓ Permit reapplication requirements
___ Onsite inspections
___ Citizen involvement
___ Other (specify) _____

How often is the survey to be updated? *Not mentioned in Program.*

Are there any problems that the Control Authority has in identifying and categorizing SIUs: *Stateside (galvanizer) should be covered under CFR 420, not CFR 433. This will be an audit requirement.*

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?
ATM Oil	*Just identified as a CWT under CFR 437.*	*Pending*

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

a. 4 SIUs (As defined by the Control Authority) [RIDE-SIUS]*
b. 4 Categorical Industrial Users (CIUs) [RIDE-CIUS]
c. 0 Non-categorical SIUs
d. 5 Other regulated nonsignificant IUs (Describe) *Coca-Cola Bottling, Langston Bag, Nu-Way, ATM Oil and Uni-Lube.*
9 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)]

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?

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

What is the maximum term of the control mechanism? 3 years

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [RIDE-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? **FOG from restaurants*

___ ✓ 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[1]? [403.5(b)(8)]

n/a Are all applicable categorical standards and local limits applied to trucked wastes?

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

Pollutant	Limit
n/a	

Describe the discharge point(s) (including security procedures):
Equalization Basin which in turn is pumped to the headworks.

___ ✓ Does the Control Authority accept Underground Storage Tank (UST) cleanup Wastes?

n/a Does the Control Authority have a control mechanism for regulating wastes from UST sites?

List all pollutants and applicable limits, other than local limits and categorical standards, that are applied to UST cleanup sites:

Pollutant	Limit
n/a	

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES NO

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

2/14 Date Notified Letter Method of Notification

How does the Control Authority keep abreast of current regulations to ensure proper implementation of standards?

✓	Federal Register, CFRs	✓	Journals, Newsletters
✓	Meetings, Training	✓	Other Internet
✓	Government Agencies	___	Other ___

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change

YES NO

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

City and ADEQ evaluated MAHL/TBLL in 2008 for permit renewal

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Local Limits Adopted*
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓			✓		✓	*There is no mention*
Cadmium (Cd)	✓			✓		✓	*of Local Limits nor*
Chromium-Total	✓			✓		✓	*their evaluation in*
Copper (Cu)	✓			✓		✓	*the current "approved"*
Cyanide (CN)	✓			✓		✓	*Pretreatment Program*
Lead (Pb)	✓			✓		✓	
Mercury (Hg)	✓			✓		✓	
Molybdenum (Mo)	✓			✓		✓	
Nickel (Ni)	✓			✓		✓	
Selenium (Se)	✓			✓		✓	
Silver (Ag)	✓			✓		✓	
Zinc (Zn)	✓			✓		✓	

**Control Authority removed numerical limits from ordinance #2187 to allow the City to determine limits from time to time and on a case-by-case basis.*

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

What method of allocation was used for local limits for each pollutant that has a local limit in-place? n/a

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1	1/year	
Other SIUs	n/a	1/year	No Non-Cat SIUs[1]
Sampling:			
CIUs	12-24	1/year	Business/Production fluctuations
Other SIUs	n/a	1/year	No Non-Cat SIUs
Reporting:			
CIUs	12 (TTO cert.)	2/year	"To keep their Metal Finisher on their toes"
Other SIUs	n/a	2/year	No Non-Cat SIUs
Self-Monitoring:			
CIUs	n/a*	2/year	
Other SIUs	n/a	2/year	No Non-Cat SIUs

*City performs all monitoring

#	%	
		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:

YES	NO	
	✓	If requested?
N/A		To verify IU self-monitoring results?

Provide the following information regarding pollutant analyses done by the POTW:

	Analytical Method *	Name of Laboratory
Metals	200.8,1631E / ICP	Environmental Testing
Cyanide	SM-4500CNE / Spectrophoto	" "
Organics	601 - 625 / GC/MS	" "
Other	WET	" "

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe:
The City relies on the state and EPA's certification program & has a fairly well written sampling/equipment operations procedures manual.

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

5 dys Conventionals
1 wk Metals
10 dys 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: *Since Quala has irregular flow, sometimes the CA has problems collecting samples.*

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.
n/a

I. ENFORCEMENT

YES NO

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

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

✓ ___ 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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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: _____

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: _____

YES	NO	
___	✓*	When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)] * File review did not produce this required documentation.
___	✓	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: _____
✓	___	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	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? No
*Auto Conveyor	1/13	None apparent			✓

*Facility only batch discharges 1/yr so if they bust limits, they're in SNC. City and facility need to rectify this problem.

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

#	%	
1	25	Pretreatment Standards [RIDE-SNC Pret Std] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [RIDE-SNC]
0	0	Reporting requirements [RIDE-SNC w/Reporting Requirements]
0	0	Pretreatment compliance schedule [RIDE-SNC w/Pret Schedule]

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

___ ✓ Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. _____

Has the Control Authority experienced any of the following:

YES	NO		EXPLAIN and ID Industrial User
___	✓	Interference [ICIS].	_____
___	✓	Pass through [ICIS].	_____
___	✓	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	_____		$ 0
Total	_____	[RIDE-Penalties]	$ 0

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

✓ ___ Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES	NO	
✓	___	computerized[1]
✓	___	hard copy
___	___	OTHER: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
	✓	Inspection and Sampling schedule
✓		Monitoring Data
✓		IU Compliance Status Tracking
✓		Other: *Inf/Eff/Sludge*

Can IU monitoring data can be retrieved by:

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

✓ ___ Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]

✓ ___ Have IUs requested that data be held confidential?
How is confidential information handled by the Control Authority?
Kept in a locked file cabinet

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

If yes, please explain: n/a

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

K. RESOURCES

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

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:

		Percent of Total Funding
✓	POTW general operating fund	75
✓	IU permit fees (Goes back to GOF)	25
✓	monitoring charges (Goes back to GOF)	
	industry surcharges	
	other (describe) _____	
		Total *100%*

SECTION II: PROGRAM ANALYSIS AND PROFILE

✓ ___ Is funding expected to continue near the current level? If no, will it:
Increase ____ or Decrease ____
If no, describe the nature of the changes:

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

YES	NO		If no, explain
✓	___	Legal assistance	
✓	___	Permitting	
✓	___	IU inspections	
✓	___	Sample collection	
✓	___	Sample analyses	
✓	___	Data analysis, review and response	
___	✓	Enforcement	During '13 an FTE was out sick for 4 months. The Pretreatment Coord. (Env. Director) fell behind because she had to take on his job duties
✓	___	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	*6 automated ISCO samplers;*
✓	___	Safety equipment	*standard list*
✓	___	Vehicles	*2*
✓	___	Analytical equipment	*pH meters; spectrophotometric equip. electronic balance, incubator, Hach Testers, COD reactors, etc.*

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

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

2. Has the source of any toxic pollutants been identified? *No*
If yes, what was found?

3. Has the POTW implemented any kind of public education program? If yes, describe:
The POTW plans to place articles in the local newspaper to inform the public on proper O&G and pharmaceutical disposal. The POTW personnel plans to speak at local schools (elementary, junior & senior), too.

4. Does the POTW have any pollution prevention success stories for industrial users documented? *No*. If yes, please attach.

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

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

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Grace Trailer Service File/ID No. 24
Industry Address 615 Petro Cove 72301
Industry Description Truck Wash (Interior/Exterior)
Industrial Category: TEC 40 CFR: 442 SIC/NAICs Codes: 7542/811192
Avg. Total Flow (gpd) 80,000 Avg. Process Flow (gpd) 80,000

Industry visited during audit: YES

Comments: Chemical & petroleum cargo 870-732-0404

FILE #: 2 Industry Name Automated Conveyors System, Inc File/ID No. 2
Industry Address: 3850 Southland Drive 72301
Industry Description: Mfg of conveyor systems
Industrial Category metal finisher 40 CFR 433 SIC/NAICS Codes: 3535/333922
Avg. Total Flow (gpd) 1,020 Avg. Process Flow (gpd) 1,020 ~ 1 batch/yr

Industry visited during audit: YES

Comments: ASCI makes 80% power driven conveyors, 20% gravity conveyors

FILE #: 3 Industry Name Stateside Steel & Wire, LLC File/ID No. 25
Industry Address 394 Wyanoka Road
Industry Description Mfg & galvanizing steel "chain link" fencing
Industrial Category Iron and Steel CFR 420 SIC/NAICS Codes: 3315/331222
Avg. Total Flow (gpd) 6,811 Avg. Process Flow (gpd) 6,811

Industry visited during audit: NO

Comments: The facility was undergoing reconstruction because of roof damage from ice storms and was not in operation.

FILE #: 4 Industry Name Quala File/ID No. 26
Industry Address: 400 Mound City Road
Industry Description Truck Wash
Industrial Category TEC 40 CFR 442 SIC/NAICS Codes: 7542/811192
Avg. Total Flow (gpd) 7,900 Avg. Process Flow (gpd) 7,900

Industry visited during audit: YES

Comments:

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

Industry visited during audit: YES

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism (see Attch. A-1 for example)

1.	Does the file contain an application for a control mechanism?	✓	✓	✓	✓	
	If yes, what is the application date?	4/11	4/11	4/11	4/11	
	Does it ask for Pollution Prevention information?	✓	✓	✓	✓	
2.	Does the file contain a Permit? *(See Attch A-2 for example)*	✓	✓	✓	✓	
	Permit Expiration Date?	✓	✓	✓	✓	
	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?	5/14	5/14	5/14	5/14	
	c. Statement of nontransferability?	✓	✓	✓	✓	
	d. Appropriate discharge limitations?	1	✓	3 no	1	
	e. Appropriate self-monitoring requirements?	2	✓	3	✓	
	f. Sampling frequency?	✓	✓	✓	✓	

Comments: 1) Both TECs have developed a pollution management plan, but the City still requires the CFR 442 limits to be met; 2) City does all sampling; 3) Facility has been mis-categorized as a Metal Finisher. Its permit will have to modified to reflect the standards under CFR 420 (see Attch. A-4 for IU's permit limits' page).

SECTION III: INDUSTRIAL USER FILE REVIEW

		File 1	File 2	File 3	File 4	FILE 5
g.	Sampling locations?	✓	✓	✓	✓	
h.	Requirement for flow monitoring?	1	1	1	1	
i.	Types of samples (grab or composite) for self-monitoring?	2 Timed	2 Timed	2 Timed	2 Timed	
j.	Applicable IU reporting requirements?	✓	3	4	✓	
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	no	no	no	
C.	Application of Standards					
1.	Has the IU been properly categorized?	✓	✓	4	✓	
2.	Were both Categorical Standards and Local Limits properly applied?	✓	✓	4	✓	
3.	Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	n/a	n/a	n/a	n/a	
4.	For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	n/a	n/a	4 no	n/a	

Comments: 1) Permits don't require flow monitoring and the City is only relying on water usage records; 2) Permits just say composites w/no differentiation between timed or flow proportioned. The City is time compositing all their samples; 3) Automated Conveyer (CFR 433) is certifying with a TOMP 2/yr and 4) IU has been certifying with a TOMP, but is mis-categorized requiring its permit to be revised to reflect the production based category under the Iron and Steel ELG in 40 CFR 420.

SECTION III: INDUSTRIAL USER FILE REVIEW

		File 1	File 2	File 3	File 4	FILE 5
5.	For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	n/a	n/a	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?	✓	✓	✓	✓	
2.	Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	
3.	Does the sampling report(s) include: [403.8(f)(2)(vi)]					
	a. Name of sampling personnel?	✓	✓	✓	✓	
	b. Sample date and time?	✓	✓	✓	✓	
	c. Sample type?	✓	✓	✓	✓	
	d. Wastewater flow at the time of sampling?	no	no	no	no	
	e. Sample preservation procedures?	✓	✓	✓	✓	
	f. Chain-of-custody records?	✓	✓	✓	✓	
	g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	FILE 5
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	n/a	✓	1	n/a	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Timed	Timed	Timed	Timed	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	
Inspections *(See Attch. A-5 for example)*					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	
b. Date of last Inspection	9/13	9/13	9/13	9/13	
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	1 no	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	2	2	2	2	
f. Evaluation of pretreatment facilities?	3	n/a	3	3	

Comments: 1) As previously mentioned, this facility is mis-categorized as a Metal Finisher and should be covered under the production based category of Iron and Steel in CFR 420; 2) There's no delineation between process flow or total plant water usage numbers and 3) Could be more details on the physical shape/cleanliness/O&M of the IUs' pretreatment system (rusting or leaks apparent, e.g.?)

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	FILE 5
g. Evaluation of self-monitoring equipment and techniques?	N/A	N/A	N/A	N/A	
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)(i)]	1 ✓	1 ✓	1 ✓	1 ✓	
i. Manufacturing facilities?	n/a	2	✓	n/a	
j. Chemical handling and storage procedures?	3	3	3	3	
k. Chemical spill prevention areas?	✓	✓	✓	✓	
l. Hazardous waste storage areas and handling procedures?	✓	✓	✓	✓	
m. Sampling procedures?	n/a	n/a	n/a	n/a	
n. Laboratory procedures?	n/a	n/a	n/a	n/a	
o. Monitoring records?	n/a	n/a	n/a	n/a	
p. Evaluation of Pollution Prevention opportunities?	4 no	4 no	4 no	4 no	
q. Control Authority inspector signature?	✓	✓	✓	✓	
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	n/a	n/a	n/a	n/a	
11. Does the file include:					
a. BMR?	arch.	arch.	arch.	arch.	
b. 90-Day Report?	"	"	"	arch.	
c. All periodic reports?	n/a	n/a	n/a	n/a	
d. Compliance schedule reports?	n/a	n/a	n/a	n/a	

Comments: 1) All permitted SIUs have some form of a slug control plan whether one is necessary or not. City has no documentation a Slug potential evaluation was even conducted; 2) IUs' manufacturing process could be more detailed; 3) There should be a brief narrative on how the IU handles its chems. from the loading dock to the various stations where they're used (fork lifts, barrel dollies, overhead piped, etc); 4) Inspection forms need questions regarding Pollution Prevention (P2). Two of the IUs visited had pollution management plans (per CFR 442) and 1 had countercurrent flow rinse waters sent to the previous tank for make-up water.

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	FILE 5
12. Did the IU report on all required parameters?	n/a	n/a	n/a	n/a	
13. Did the IU comply with the required sampling frequency(s)?	n/a	n/a	n/a	n/a	
14. Did the IU report flow?	1	1	1	1	
15. Did the IU comply with the required reporting frequency(s)?	n/a	n/a	n/a	n/a	
16. For all SIUs, are self-monitoring reports signed and certified?	n/a	2	n/a	n/a	
17. Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	
18. Has the IU developed a Slug Control and Prevention Plan?	3	3	3	3	
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	
b. Did POTW respond to the spill?	--	--	--	--	

E. Enforcement

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

Comments: 1) City only records monthly water usage; 2) IU certifies to their TOMP monthly and 3) City just required their SIUs to develop one; no City evaluations found.

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	FILE 5
c. If NS CIU was it compliant within 90 days from commencement of discharge?	n/a	n/a	✓	n/a	
2. How many reports submitted during the past reporting year indicated discharge violations?	1 2	1 2	1 3	1 4	
3. Did the Control Authority notify the IU within 24 hours 24 hours of becoming aware of the violation(s)?	✓	no	no	no	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	✓	2	✓	✓	
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	
6. Was the IU notified of all violations?	no	no	no	no	
7. Was adequate follow-up enforcement action taken by the Control Authority?	no	no	no	no	
8. Did the Control Authority follow its approved ERP?	no	no	no	no	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	3	2	3	3	
10. Is there a compliance schedule? If yes:	n/a	n/a	n/a	n/a	
11. Were there any compliance schedule violations?	n/a	n/a	n/a	n/a	

Comments: 1) City does monitoring; 2) IU only batch discharges ~once/yr. Its wastewater is so concentrated after that period, it has chronically busted the Zn limits (under CFR 433) and 3) Even though there were no enforcement actions taken by the City, the IUs returned to compliance (except for Automated Conveyor).

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	FILE 5
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	
During 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	
Date of publication.	--	4/25/14	4/25/14	--	

Comments: Public notice took place after the physical audit. The City's annual report was recently received.

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of West Memphis NPDES #: AR0022039

Date of Audit: 3/11 - 3/13/14 Date entered into QNCR: 5/7/14
(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
YES	Failure to enforce pretreatment standards and reporting requirements	II
YES	Other violations of concern	II

SIGNIFICANT NONCOMPLIANCE (SNC)

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

YES Is the Control Authority in SNC for violation of 2 or more Level II criterion.

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PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: West Memphis NPDES #: AR0022039

Name, address and phone number of industry:
Grace Trailer Service, 615 Petro Cove, 870.732.0404

Type of industry: Truck Wash
40 CFR 442

Date/Time of visit:
3/13/14 / 9:30 a.m.

Industry contacts: Juan Perez and Chris Fox

	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	✓		

Comments: Facility has not changed operations substantially since the October '10 audit. The IU still washes the interior truck tankers and exteriors of the trailers. There's only one bay for the exterior washes. IU has 5 maintenance bays which create no wastewater.

Visit conducted by: Gilliam/Bosnick/Jones Date: 3/13/14

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: West Memphis NPDES #: AR0022039

Industry name: Grace Trailer

Comments: No bay is dedicated to what they call "food grade", but bay 1 is where they wash all their dry bulk chems and the exterior of the trucks. The other 4 are dedicated to strictly interior chemical washing with all bays connected by a central below grade grated trough in which any waste wash fluids are captured in a below grade "settling vat" and sent to treatment ~ monthly. IU has developed a comprehensive pollution management plan (PMP) similar to its in-town competitor which they follow. "First flush" of the tankers is mixed with the "heels" and sold back to the customer. All log books, bills of laden, etc are kept on-site. All cleaning procedures per chemical is pre-determined, but sometimes the customer prescribes the cleaning solutions desired. Some might want a caustic wash 1st, then detergent cleaning 2nd depending on what the tanker is to haul next. Based on experience the IU rep says they just know what cleaning solutions are needed to clean the tankers which are written in PMP. Cleaning chemicals, whether they are caustics, acids, detergents, etc are kept in a centralized area (with the boiler) and over-head pumped in the correct percentages to the actual swivel-head cleaning jet which is protruded down into the tankers. "Treatment" consists of a an oil "mop" (similar to a rope skimmer, but is made of cloth) with the oil squeezed out and sent to a used oil container to be sent to another City IU (ATM). Remaining wastewater is sent to one of the 2 aeration tanks (1 remains empty and clean until the other is full and needs to be dumped and cleaned), pH adjustment as necessary then sent to the City. IU has a secondary holding tank in case of a bad batch hitting an aeration tank. pH meter is calibrated daily. This treatment system which contains totes and other chemical storage barrels are inside a secondary containment wall ~3' tall made of cinder blocks. Adequate sampling point although what was being discharged looked a rusty turbid. IU rep familiar with their permit requirements and the City reps were familiar with the IU's processes/pretreatment.

Visit conducted by: Gilliam/Bosnick/Jones Date: 3/13/14

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

1. Control Authority: West Memphis NPDES #: AR0022039

Name, address and phone number of industry: Automated Conveyor Systems 3850 Southland Dr., 870.732.4187
Type of industry: Metal Finishing 40 CFR 433 Date/Time of visit: 3/12/14 @ 11:10 a.m.

Industry contacts: Chip Doty, HR Mgr & Jeff Doty, Steel Foreman

	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	✓		

Comments:

Facility has not changed operations substantially since the last audit in Oct. '10. The IU manufactures conveyor systems - power driven, roller-gravity and some belt types. Raw material includes mild carbon steel, cold rolled steel sheets, some aluminum and pre-galvanized strip steel (which is not phosphatized). Some parts are brought in from outside companies.

Visit conducted by: Gilliam/Bosnick/Jones Date: 3/12/14

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: West Memphis NPDES #: AR0022039

Industry name: Automated Conveyor

Additional comments: The IU falls under the metal finishing regs because of its 4 stage phosphatizing system. To this auditor, this system is unique because it consists of 4 stages, the 1st contains the phosphatizing stage (~2,200 gal) followed by 3 fresh water rinses (2nd and 4th stages - 900 gallons w/the 3rd stage being 2,200 gallons). The 1st stage is heated with all counter current flowed back to the previous tank. Tanks are agitated simply by recycling pump action between stages. ~Once/year all 4 tanks are batch discharged and has caused problems meeting the CFR 433 Zn limit because of their P2 activity of countercurrent rinsing from the 4th stage to the 3rd to the 2nd and finally back to the 1st. Any drag-out from the 4th stage (very little observed) is caught by a drip pan (angled metal sheet) which gravity flows any drag-out back into the 4th stage. After phosphatizing (pH ~ 5 s.u.) and rinses it goes to a dry-off oven, then to the powder coat paint room and then sent to a cure oven. The only floor drain is where they manually pump the 4 stages into which in turn gravity flows to the City. Very little chemical storage inside the main building. Outside storage for paint. Various parts are then assembled to customer specs and stored under roof until delivery. Other non-w.w. generating operations include cut-off, lazer cutting, stamping, punching, grinding and welding. Adequate sampling point and the facility rep was familiar with their permit requirements.

Visit conducted by: Gilliam/Bosnick/Jones Date: 3/12/14

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: West Memphis NPDES #: AR0022039

Name, address and phone number of industry:
West Memphis Steel, 1101 Thompson Ave., 870.733.8922
Type of industry: Steel sheet broker or warehouse Date/Time of visit: 3/12/14 / 3:05 p.m.
Industry contacts: Joe Brackin, COO & Jay Ivy, Ops. 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?	✓		✓
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			✓

Comments:

Simply because of its name, this facility was visited to verify it generated no regulated wastewater. The company only brings in bulk sheet ("flats") metal - hot rolled, angles, "channels" and rolls (which they "unroll") to then sell to customers needing smaller quantities. They do have 2 break presses, 4 shearing machines, but do not generate any regulate process w.w. under CFR 433.

It is confirmed West Memphis Steel would not be subject to West Memphis' Pretreatment Program.

Visit conducted by: Gilliam/Bosnick/Jones Date: 3/12/14

Allen Gilliam
(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: West Memphis NPDES #: AR0022039

Name, address and phone number of industry:

Quala, 400 Mound City Rd., 870.732.2255

Type of industry: TEC
40 CFR 442

Date/Time of visit:
3/12/14 / 1:35 p.m.

Industry contacts: Rickey Graham II, Facility Manager/Justin Baski, EHS Specialist & Bob Patton, Chemist/Env. Director

	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 has not changed operations substantially since the last audit in Oct. 2010. Facility washes the interior of tanker trucks of chemicals and food grade material. IU has developed a pollution management plan (PMP) similar in nature to the one described in CFR 442.16(b)(5) and is following it. Initial conversations with the IU rep involved discussions about the wastewater flow schematic in the City's file.

Visit conducted by: Gilliam/Bosnick/Jones Date: 3/12/14

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: West Memphis NPDES #: AR0022039

Industry name: Quala

Additional comments: This facility has 3 bays, 1 for chemical cleaning while the other 2 are for food grade cleaning (Kosher certified) with only water. Chemicals to be cleaned out are matched to the appropriate PMP procedures (which are filed on their computer) for ensuring the correct chemicals are used to clean the tanker. The heels are completely drained/stored and usually sold to the company it was being shipped to. Even the "first flush" is captured and mixed with the heels. Other non-haz waste (such as fatty acids [soap, e.g.]) is dumped into a roll-off box with another company hauling it off to the local landfill where it is TCLP'd. IU does have a "do not clean list" hanging on the wall. This list was developed by looking at the MSDS' toxicity, explosive limit among others. Operators are hazmat trained and are equipped with all safety gear possible from head to feet. Any wastewater is captured in the in-common floor grate which flows to a sump. From there it is pumped overhead to treatment which consists of a DAF unit; alum for chemical precipitation; pH adjustment with a floc tank. Treatment only has to run about 2 hrs/day with solids being skimmed off the top and sent to landfill. Chemical storage (cleaning fluids) is contained in 4 vats containing hot water, hot caustic, hot "booster", detergent. The diesel tank is separate.

IU rep was very familiar with the TEC's standards, PMP and appeared to have all documentation on-site to show they were implementing an approvable PMP. Adequate sampling site.

Visit conducted by: Gilliam/Bosnick/Jones Date: 3/12/14

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

APPLICATION FOR PERMIT
FOR DISCHARGE OF INDUSTRIAL WASTES TO
CITY OF WEST MEMPHIS

DATE: 4/29/2011

1. FIRM NAME: Grace Trailer Services, LLC

ADDRESS: P.O. Box 2705

West Memphis, Arkansas 72301

TELEPHONE: (870) 732-0404

2. CORPORATE HEADQUARTERS/REGISTERED AGENT:

NAME: Grace Trailer Services, LLC

ADDRESS: 615 Petro Cove

West Memphis, Arkansas 72301

TELEPHONE: (870) 732-0404

CONTACT PERSON: Chris Fox

3. STANDARD INDUSTRIAL CLASSIFICATION (SIC) AND/OR NORTH AMERICAN INDUSTRIAL CLASSIFICATION (NAIC) CODE NUMBERS:
NAIC 811192

4. LIST OF OTHER ENVIRONMENTAL CONTROL PERMITS HELD AT THIS TIME:

5. NUMBER OF EMPLOYEES: 52

6. QUANTITY OF WASTEWATER:	PROJECTED FOR NEXT THREE (3) YEARS (IN GALLONS)	
DISCHARGE TO WEST MEMPHIS SEWER	AVERAGE DAILY (30 DAY)	MAXIMUM DAILY (1 DAY)
A. PROCESS WASTEWATER FROM OPERATION	81,250	85,000
B. PROCESS WASTEWATER FROM OPERATION		
C. DOMESTIC WASTEWATER FROM SANITARY SEWER	8,000	22,000
D. NON-CONTACT COOLING WATER		
E. TOTAL WASTEWATER DISCHARGE TO PUBLIC SEWAGE WORKS	89,250	107,000

LIST PERIODIC OR SEASONAL VARIATIONS:

December, January, and Fedruary are slower months for GTS. As such, production numbers are lower during these months.

7. WASTEWATER POLLUTANT PARAMETERS AND CONCENTRATIONS:

A. *CONVENTIONAL POLLUTANT* - IN THE SPACES BELOW, INDICATE THE MEASURED (OR PROJECTED FOR NEW INDUSTRY) AVERAGE AND MAXIMUM VALUE FOR EACH OF THE LISTED WASTEWATER POLLUTANTS.

PARAMETER	CONCENTRATION AVERAGE DAILY (30 DAY)	MAXIMUM DAILY (1 DAY)
BIOCHEMICAL OXYGEN DEMAND (5 DAY), MG/L	200 mg/L	250 mg/L
SOLIDS, MG/L	250 mg/L	300 mg/L
pH, UNITS (1)	8.0	10
OIL AND GREASE, MG/L (2)	80 mg/L	100 mg/L
TEMPERATURE, DEGREES F	65 deg F	100 deg F

(1) 5.5 TO 10.0

(2) MAXIMUM 100 MG/L FOR ONE (1) DAY.

A-1c

B. *PRIORITY POLLUTANTS* - INDUSTRIES DISCHARGING ANY OF THE POLLUTANTS LISTED ON ATTACHMENT NO. 1 MUST PERFORM SAMPLING AND ANALYSES NECESSARY TO DEVELOP INFORMATION REQUIRED TO COMPLETE THE SECTION. IN THE SPACES BELOW, INDICATE THE RESULTS OF SAMPLING AND ANALYSES FOR PRIORITY POLLUTANTS FOUND IN YOUR WASTEWATER.

INDUSTRIES REGULATED BY FEDERAL CATEGORICAL STANDARDS MUST PERFORM (OR FOR NEW INDUSTRIES, HAVE PERFORMED ON A LIKE FACILITY) SAMPLING AND ANALYSES IN ACCORD WITH 40 CFR 403.12. ADDITIONALLY, THE FOLLOWING INFORMATION MUST BE RECORDED AND MAINTAINED AT AND BY THE INDUSTRY: PERSON COLLECTING THE SAMPLE, THE TIME, DATE AND PLACE OF SAMPLE COLLECTION, THE TYPE OF SAMPLE (GRAB, TIME WEIGHTED COMPOSITE, FLOW WEIGHTED COMPOSITE, ETC.) THE METHOD OF COLLECTION, AND THE PERSON PERFORMING THE ANALYSES, THE EPA APPROVED METHOD OF ANALYSIS, AND ALL QUALITY CONTROL DATA PERTINENT TO THE ANALYSIS. THE STATEMENT AT THE BOTTOM OF THIS SECTION MUST BE SIGNED BY AN AUTHORIZED REPRESENTATIVE OF THE COMPANY FAMILIAR WITH THE MANUFACTURING OR REGULATED PROCESS.

PRIORITY POLLUTANT NUMBER	AVERAGE DAILY PARAMETER	CONCENTRATION MG/L MAXIMUM DAILY (30 DAY)	(1 DAY)

(USE ADDITIONAL SHEETS IF NECESSARY)

I HEREBY CERTIFY THAT THE ABOVE CHEMICAL ANALYSIS IS REPRESENTATIVE OF DAILY OPERATIONS AND THAT THE INFORMATION PROVIDED ABOVE IS TRUE AND ACCURATE.

SIGNATURE Not Applicable

TITLE _____

DATE _____

8. ATTACH SKETCH(ES) OF GENERAL PLANT PROCESS AND WASTE LINE LAYOUTS, INCLUDING LOCATION OF FLOOR DRAINS. INCLUDE ANY EXISTING OR PROPOSED PRETREATMENT SYSTEMS AND LOCATION AND SIZE OF ALL EXISTING AND PROPOSED CONNECTIONS TO THE WEST MEMPHIS SEWER

SYSTEM. ALSO INCLUDE DETAILS OF PROPOSED MONITORING FACILITIES. Drawings of this facility are currently on file with WMUC.

9. (A) BRIEF DESCRIPTION OF THE NATURE OF MANUFACTURING PROCESS OR COMMERCIAL ACTIVITIES AT THE PLANT: GTS performs exterior and interior cleaning of cargo tank trailers. In addition, GTS repairs cargo trailers and performs light truck maintenance.

(B) GENERAL DESCRIPTION OF PRODUCTS PRODUCED BY TYPE AND AMOUNT: Not Appicable

(C) GENERAL DESCRIPTION OF TYPE AND AMOUNT OF RAW MATERIALS PROCESSED: Not Appicable

10. BRIEF DESCRIPITON OF BEST MANAGEMENT PRACTICES/ POLLUTION PREVENTION TECHNIQUES BEING IMPLEMENTED BY THIS FACILITY. IF NOT AT THE CURRENT TIME, ARE ANY PLANNED FOR THE FUTURE? The Slug Plan and The Pollution Management Plan (PMP) have been updated and include current pre-treatment schematics. GTS is planning to upgrade the maintenance shop in 2011, while upgrades and improvements to the wash rack office, breakroom, and restrooms are also anticipated.

11. HOURS OF OPERATION OF PLANT AND ACTUAL OR PROPOSED HOURS OF OPERATION OF PRETREATMENT SYSTEM:

7:00 A.M. - 12:00 A.M Monday - Friday

7:00 A.M. - 12:00 P.M. Saturday

12. IS YOUR MANUFACTURING OR COMMERCIAL OPERATION(S) SUBJECT TO NATIONAL CATEGORICAL PRETREATMENT STANDARDS ESTABLISHED UNDER 40 CFR 403.?

YES X NO _____

APPLICABLE NATIONAL CATEGORICAL STANDARD(S): 40 CFR Part 442, effluent limitation guidelines, pre0treatment standards, and new source performance standards for the transportation equipment cleaning point source.

13. ARE THE APPLICABLE NATIONAL CATEGORICAL PRETREATMENT STANDARDS AND THE WEST MEMPHIS LOCAL DISCHARGE LIMITATIONS BEING MET ON A CONSISTENT BASIS?

YES X ① NO X ②

REMARKS: GTS has had issues with meeting the local ordnance for Oil & Grease. GTS has requested to use the Federal Pre-Treatment Standards under 40 CFR Part 403, which would provide some relief.

14. IF THE APPLICABLE WASTEWATER DISCHARGE LIMITATIONS ARE NOT BEING MET CONSISTENTLY, IS ADDITIONAL PRETREATMENT AND/OR ALTERATION OF CURRENT OPERATION AND MAINTENANCE (O & M) REQUIRED BY YOUR FIRM TO MEET THE LIMITATIONS?

A-1f

YES X ② NO _____

REMARKS: GTS has hired a full time maintenanceperson to skim and run the mopping unit. GTS is retraining personal to ensure that residual oils are appropriately handled without discharge to the pre-treatment system.

15. IF ADDITIONAL PRETREATMENT AND/OR O & M ARE REQUIRED TO MEET NATIONAL CATEGORICAL APPLICABLE DISCHARGE LIMITATIONS, SUBMIT THE SHORTEST SCHEDULE BY WHICH YOUR FIRM WILL PROVIDE SUCH ADDITIONAL PRETREATMENT.

(A) THE SCHEDULE SHALL CONTAIN A LIST OF MAJOR EVENTS LEADING TO COMPLIANCE. THE EXPECTED DATES OF COMPLETION OF SUCH EVENTS SHALL ALSO BE GIVEN.

(B) THE COMPLETION DATES OF ANY TWO SUCCESSIVE EVENTS SHALL NOT EXCEED NINE MONTHS.

(C) WITHIN 14 DAYS AFTER THE COMPLETION OF EACH EVENT, THE INDUSTRIAL USER SHALL SUBMIT A PROGRESS REPORT TO THE DIRECTOR Of ENVIRONMENTAL QUALITY INDICATING: (1) DATE THE EVENT WAS COMPLETED, (2) IF THE EVENT IS NOT COMPLETED AS SCHEDULED, THE REASON FOR THE DELAY, (3) THE EXPECTED DATE OF COMPLETION, AND STEPS TAKEN BY THE INDUSTRIAL USER TO RETURN TO THE ESTABLISHED SCHEDULE.

I, THE UNDERSIGNED APPLICANT, BEING THE AUTHORIZED REPRESENTATIVE OF THE HEREIN NAMED COMPANY, DO HEREBY REQUEST A PERMIT TO USE OR TO CONTINUE TO USE AN INDUSTRIAL SEWER CONNECTION AT THE LOCATION INDICATED HEREIN AND DO AGREE TO COMPLY WITH APPLICABLE PROVISIONS OF WEST MEMPHIS CITY CODE REGULATION THE USE OF PUBLIC SEWAGE WORKS.

SIGNATURE APPLICANT _____

DATE 5/3/11

NAME OF SIGNEE Chris Fox

TITLE OF SIGNEE General Manager

NAME AND TELEPHONE OF PERSON TO CONTACT REGARDING PERMIT INFORMATION Shawn Stewart Pool, (901) 619-9158

CORPORATE ACKNOWLEDGMENT

STATE OF Arkansas
COUNTY OF Crittenden
BEFORE ME, THE UNDERSIGNED AUTHORITY, ON THIS DAY PERSONALLY APPEARED Chris Fox
OF Grace Trailer Services, LLC
A CORPORATION, KNOWN TO ME TO BE THE PERSON WHOSE NAME IS SUBSCRIBED TO THE FOREGOING INSTRUMENT, AND ACKNOWLEDGED TO ME THAT HE EXECUTED THE SAME FOR PURPOSES AND CONSIDERATIONS THEREIN EXPRESSED, IN THE CAPACITY THEREIN STATED AND AS THE ACT DEED OF SAID CORPORATION.

GIVEN UNDER MY HAND AND SEAL OF OFFICE ON THIS Third

DAY OF May, 2011

NOTARY PUBLIC IN AND FOR Crittenden
COUNTY, Arkansas (State)

DEBORAH L KINNEY
NOTARY PUBLIC-STATE OF ARKANSAS
CRITTENDEN COUNTY
My Commission Expires 01-13-2019
Commission # 12369446

PRIORITY POLLUTANTS

VOLATILE COMPOUNDS

02 ACROLEIN
004 BENZENE
006 CARBON TETRACHLORIDE
051 CHLORODIBROMOMETHANE
019 2-CHLOROETHYLVINLY ETHER
048 DICHLOROBROMOMETHANE
010 1,2-DICHLOROETHANE
032 1,2-DICHLOROPROPANE
038 ETHYLBENZENE
045 METHYL CHLORIDE
015 1,1,2,2-TETRACHLOROETHANE
086 TOLUENE
011 1,1,1-TRICHLOROETHANE
087 TRICHLOROETHYLENE
088 VINYL CHLORIDE
003 ACRYLONITRILE
047 BROMOFORM
007 CHLOROBENZENE
016 CHLOROETHANE
023 CHLOROFORM
013 1,1-DICHLOROETHANE
029 1,1-DICHLOROETHYLENE
033 1,3-DICHLOROPROPYLENE
046 METHYL BROMIDE
044 METHYLENE CHLORIDE
085 TETRACHLOROETHYLENE
030 1,2-TRANS-DICHLOROETHYLENE
014 1,1,2-TRICHLOROETHANE

ACID COMPOUNDS

024 CHLOROPHENOL
034 2,4-DIMETHYLPHENOL
059 2,4-DINITROPHENOL
058 4-NITROPHENOL
064 PENTACHLOROPHENOL
021 2,4,6-TRICHLOROPHENOL
031 2,4-DICHLOROPHENOL
060 4,6-DINITRO-O-CRESOL
057 2-NITROPHENOL
022 P-CHLOTO-M-CRESOL
065 PHENOL

BASE/NEUTRAL COMPOUNDS

001 ACENAPHTHENE
078 ANTHRACENE
072 BENZO(A)ANTHRACENE
074 BENZO(B)FLUORANTHENE
075 BENZO(K)FLUORANTHENE
018 BIS(2-CHLOROETHYL)ETHER
017 BIS(CHLOROMETHYL)ETHER
066 BIS(2-ETHYLHEZYL)PHTHALATE
067 BUTYL BENZYL PHTHALATE
025 1,2-DICHLOROBENZENE
082 DIBENZO(A,H)ANTHRACENE
026 1,3-DICHLOROBENZENE
028 3,3-DICHLOROBENZIDINE
071 DIMETHYL PHTHALATE
035 2,4-DINITHROTOLUENE
069 DI-N-OCTYL PHTHALATE
039 FLUORANTHENE
077 ACENAPHTYLENE
005 BENZIDINE
073 BENZO(A)PYRENE
079 BENZO(GHI)PERYLENE
043 BIS(2-CHLOROETHOXY)METHANE
042 BIS(2-CHLOROISOPROPYL)ETHER
041 4-BROMOPHENYL PHENYL ETHER
020 2-CHLORONAPHTHALENE
076 CHRYSENE
040 4-CHLOROPHENYL PHENYL ETHER
027 1,4-DICHLOROBENZENE
070 DIETHYL PHTHALATE
068 DI-N-BUTYL PHTHALATE
036 2,6-DINITROTOLUENE
081 PHENANTHRENE
009 HEXACHLOROBENZENE
053 HEXACHLOROCYCLOPENTADIEN

080 FLUORENE
052 HEZACHLOROBUTADIENE
012 HEXACHLOROETHANE
054 ISOPHORONE
056 NITROBENZENE
008 1,2,4-TRICHLOROBENZENE
037 1,2-DIPHENYLHYDRAZINE (AS AZOBENZENE)
083 INDENO(1,2,3-CD)PYRENE
055 NAPHTHALENE
061 N-NITROSODIMETHYLAMINE
062 N-NITROSODIPHENYLAMINE
084 PYRENE
063 N-NITROSODI-N-PROPYLAMINE

PESTICIDES AND PCB'S

089 ALDRINE
102 ALPHA-BHC
103 BETA-BHC
092 4,4'DDT
094 4,4'DDD
095 ALPHA-ENDOSULFAN
097 ENDOSULFAN SULFATE
099 ENDRIN ALDEHYDE
106 PCB-1242
107 PCB-1254
100 HEPTACHLOR
104 GAMMA-BHC
105 DELTA-BHC
091 CHLORDANE
093 4,4'DDE
090 DIELDRIN
096 DETA-ENDOSULFAN
098 ENDRIN
113 TOXAPHENE
109 PCB-1232
111 PCB-1260
101 HEPTACHLOR EPOXIDE

METALS AND CYANIDE

114 ANTIMONY
117 BERYLLIUM
119 CHROMIUM
122 LEAD
124 NICKEL
126 SILVER
128 ZINC
115 ARSENIC
118 CADMIUM
120 COPPER
123 MERCURY
125 SELENIUM
127 THALLIUM
121 CYANIDE

MISCELLANEOUS

129 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN (TCDD)
116 ASBESTOS

Attachment A-2

WEST MEMPHIS UTILITY COMMISSION

P.O. Box 1868 604 East Cooper
(870) 735-3355
West Memphis, Arkansas 72301

INDUSTRIAL WASTES DISCHARGE PERMIT

Permit No. 24

In accordance with the provisions and conditions of the City of West Memphis Ordinance No. 2187

Grace Trailer Service, LLC
615 Petro Cove
West Memphis, Arkansas 72301

Is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the West Memphis wastewater collection system in accordance with conditions set forth in this permit. Compliance with this permit does not relieve the User of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, state, and federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of West Memphis Ordinance No. 2187.

This permit shall become effective on: June 15, 2008.
And shall expire at midnight on: May 31, 2011.

This permit is not transferable to persons, companies, or processes other than those to which it is originally issued.

Signed this 5th day of June 2008.

John Rimmer
General Manager

Denise Bosnick
Director of Environmental Quality

PART I- EFFLUENT LIMITATIONS

1) During the period of June 15, 2008 to May 31, 2011 the User is authorized to discharge process wastewater to the City of West Memphis wastewater collection system from the outfall listed below:

Outfall: Discharge point located at the small building east of the pretreatment facility.

2) During the period of June 15, 2008 to May 31, 2011 the discharge from the above outfall shall not exceed the following effluent limitations.

	Effluent Limitations	
Parameter	Daily Maximum	Monthly Average
Oil & Grease	(1, 2) 100 mg/L	
Temperature	(1) 104 F° / 40 C°	
pH	(1) 5.5 - 10.0	
Total Suspended Solids	(2)	
Biochemical Oxygen Demand	(2)	
Copper	(3) 0.84 mg/L	
Mercury	(3) 0.0031 mg/L	
Non-Polar Material (SGT-HEM)	(3) 26 mg/L	

1) Local sewer use ordinance.
2) Organic pollutants may be revised to limit the concentration, which may be discharged without paying a surcharge.
3) Process wastewater per 40 CFR 442.15 pretreatment standards for existing sources.

PART II - GENERAL AND SPECIFIC PROHIBITIONS

1) No user shall introduce or cause to be introduced into the POTW any pollutant or wastewater which cause pass through or interference. 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) Stormwater and all other unpolluted drainage shall be discharged to sewers specifically designated as storm sewers or to a natural outlet. Users discharging industrial wastewater to storm sewers or natural outlets shall be responsible for obtaining appropriate permit to do so from the Arkansas Department of Environmental Quality and from the Environmental Protection Agency.

3) No User shall introduce or cause to be introduced into the POTW the following pollutants, substances or wastewater:

a) Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees centigrade using test methods specified in 40 CFR 261.21;

b) Wastewater having a pH less than 5.5 or more than 10.0, or otherwise causing corrosive structural damage to the POTW or equipment;

c) Solid or viscous substances in amounts which will cause obstruction to the flow in the POTW resulting in interference;

d) Pollutants, including oxygen demanding pollutants (BOD, etc.) released in a discharge at a flow rate and\or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW;

e) Wastewater which will inhibit biological activity in the POTW resulting in interference, but in no case wastewater which causes the temperature at the point of introduction into the POTW exceeds forty (40) degrees centigrade or one hundred four (104) degrees Fahrenheit;

f) Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through with the POTW;

g) Pollutants which results in the presence of toxic gasses, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems.

h) Storm water, surface water, ground water, artesian well water, rood runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, noncontact cooling water, and unpolluted wastewater, unless specifically authorized by the Director of Environmental Quality.

PART III-MONITORING REQUIREMENTS

1) Grace Trailer Service, LLC shall provide a sampling access facility on its building sewer at a point before the building sewer discharge mixes with other discharges in the public sewer. The location, configuration and equipment contained in the sampling access facility shall be as approved by the West Memphis Utility Commission.

2) Sampling and analyses of wastewater discharged into the West Memphis wastewater collection system shall be performed by the West Memphis Utility. Grace Trailer Service, LLC shall pay to West Memphis Utility the costs of required sampling and analyses. Grace Trailer Service, LLC may upon request obtain a portion of the samples for their analyses. Authorized West Memphis Utility personnel perform the splitting of samples.

3) The sampling of effluent shall be performed no less than monthly. The analyses shall be performed on 24-hour composite samples, except that of temperature, pH, cyanide and oil and grease shall be performed on a grab sample.

4) Effluent samples shall be taken on production and/or clean up days. The day of the week on which samples are taken may be varied and shall be determined by West Memphis Utility.

PART IV-CONDITION OF PERMIT

1) Grace Trailer Service, LLC shall pay to West Memphis Utility the amount of three hundred (300.00) dollars (one hundred (100.00 dollars per year for three (3) years) as a permit fee.

2) Plans and specifications for monitoring access facilities and for pretreatment facilities shall be approved by the Director of Environmental Quality prior to construction.

3) Grace Trailer Service, LLC is required to have an Accidental Discharge/Slug Discharge Control Plan. The plan shall address, at a minimum the following:

Description of discharge practices, including non-routine batch discharges;

Description of stored chemicals;

Procedures for immediately notifying West Memphis Utility of any accidental or slug discharge;

Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include but not limited to inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutant, including solvents, and/or measures and equipment for emergency response.

4) Grace Trailer Service, LLC shall notify the Director of Environmental Quality immediately upon the occurrence of an accidental discharge of substances prohibited by Ordinance 2187 Section 2. or any slug loads or spills that may enter the collection system. West Memphis Utility should be notified by telephone at (870) 735-3355. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The user's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, state or federal laws.

Within five (5) days following such discharge, the user shall, unless waived by the Director of Environmental Quality, submit a detailed written report describing the cause(s) of the discharge and the measures to be taken by the user to prevent similar future occurrences. Such notification shall not relieve the user of any expense, loss, damage, or other liability which might be incurred as a result of

damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the user of any fines, penalties, or other liability which may be imposed pursuant to Ordinance 2187.

5) Bypass means the intentional diversion of waste streams from any portion of a user's treatment facility. Bypass is prohibited according to Ordinance 2187 Section 13(13.3) unless it is unavoidable to prevent loss of life, personal injury or severe property damage or no feasible alternatives.

6) Grace Trailer Service, LLC in accordance with Ordinance 2187 Section 6(6.5) must notify the Director of Environmental Quality of any changes to the user's operations or system which might alter the nature, quality, or volume of its wastewater at least fifteen (15) days before the change.

7) Grace Trailer Service, LLC shall maintain documentation of the disposal of sludge or other material classified as "hazardous wastes" by a method and at a site approved by appropriate state and federal regulatory agencies.

8) Grace Trailer Service, LLC shall maintain documentation of any and all records pertaining to pretreatment for three years.

10) The Director of Environmental Quality and/or an authorized representative shall have the right to enter the premises of Grace Trailer Service, LLC to determine if the user is complying with all requirements of Ordinance 2187, their Industrial Wastewater Discharge Permit or any order issued hereunder. Grace Trailer Service, LLC shall allow access to all parts of the premises for the purpose of inspection, sampling, record examination and copying, and the performance of any additional duties.

PART V - PERMIT REVOCATION

The Director of Environmental Quality may revoke an industrial waste discharge permit for good cause, including, but not limited to, the following reasons:

1) Failure to notify the Director of Environmental Quality of significant changes to the wastewater prior to the changed discharge;

2) Failure to provide prior notification to the Director of Environmental Quality of changed conditions pursuant to Ordinance 2187 Section 6(6.5)

3) Misrepresentation or failure to fully disclose all relevant facts in the industrial waste discharge permit application;

4) Falsifying self-monitoring reports and certification statements;

5) Tampering with monitoring equipment;

6) Refusing to allow the Director of Environmental Quality timely access to the facility premises and records;

7) Failure to meet effluent limitations;

8) Failure to pay fines;

9) Failure to pay sewer charges;

10) Failure to meet compliance schedules;

11) Failure to complete a wastewater survey or the wastewater discharge application;

12) Failure to provide advance notice of the transfer of business ownership of a permitted facility; or

13) Violation of any pretreatment standard or requirements, or any terms of the industrial waste discharge permit or the sewer use ordinance.

PART VI - STATEMENT OF APPLICABLE CIVIL AND CRIMINAL PENALTIES

Civil Penalties

A user who has violated, or continues to violate, any provisions of Ordinance 2187, an Individual Wastewater Discharge Permit, or order issued hereunder, or any other Pretreatment Standard or requirement shall be liable to West Memphis utility for a maximum civil penalty of $1,000.00 per violation, per day. In the case of a monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of the violation; and, each day of continuing violation may be deemed a separate violation.

The Director of Environmental Quality may recover reasonable attorney's fees, court cost, and other expenses associated with enforcement activities, including sampling and monitoring expenses, and the cost of any actual damages incurred by the City.

In determining the amount of civil liability, the Court shall take into account all relevant circumstances, including but not limited to, the extent of harm caused by the violation, the magnitude and duration of the violation, any economic benefit gained through the User's violation, corrective action by the User, the compliance history of the User, and any other factor as justice requires.

Filing a suit for civil penalties shall not be a bar against, or prerequisite for, taking any other action against the User.

Criminal Prosecution

A user who willfully or negligently violates any provision of Ordinance 2187, a Individual Wastewater Discharge Permit, or order issued hereunder, or any other Pretreatment Standard or Requirement, shall, upon conviction, be guilty of a misdemeanor, punishable by a fine of not more than $1,000.00 per violation, per day, or imprisonment for such term as allowed by the law or both.

A User who willfully or negligently introduces any substance into the POTW which cause personal injury or property damage shall, upon conviction, be guilty of a misdemeanor and be subject to a penalty of at least $100.00 but not more than $500.00 for any one (1) specified offense or violation thereof, and not less than $100.00 but no more than $1000.00 for each repetition of such event or violation, or be subject to imprisonment for such term as allowed by law, or both. The

penalty shall be in addition to any other cause of action for personal injury or property damage available under State law.

A User who knowingly makes any false statements, representations, or certifications in any application, record, report, plan, or other documentation filed, or required to be maintained, pursuant to Ordinance 2187, Individual Wastewater Discharge Permit, or order issued hereunder, or whom falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under Ordinance 2187 shall, upon conviction, be punished by a fine of $100.00 but no more than $500.00 for any one (1) specified offense or violation thereof, and not less than $100.00 but no more than $1000.00 for each repetition of such event or violation, or be subject to imprisonment for such term as allowed. This penalty shall be in addition to any other cause of action for personal injury or property damage available under State law.

Revised 2013

Attachment A-3

WEST MEMPHIS UTILITY COMMISSION
P O Box 1868 604 East Cooper
West Memphis, AR 72303
Phone (870) 735-3355 Fax (870) 732-7623

INDUSTRIAL USER INFORMATION FACT SHEET

Industrial User Name: Grace Trailer Service, LLC

Industrial User Address: 615 Petro Cove

Industrial User Mailing Address: P.O. Box 2705

City, State, Zip: West Memphis, AR, 72301

Telephone Number: (870) 732-0404

Industry Contact Person / Title: Chris Fox / Owner

Date Business Started: February 1, 1999

Classification: Categorical-Transportation Equipment Cleaning

North American Industry Classification System: 811192

Description of Industry Operation: Specialize in cleaning both Interior and Exterior of Tractor/Trailer trucks.

Final Effluent Limits: Effective no later than the effective date of the current permit (June 1, 2011), and lasting until the expiration date of the current permit (May 31, 2014), Grace Trailer Service, LLC is authorized to discharge wastewater to the West Memphis wastewater collection system. The discharge limits are as specified below:

	Effluent Limits
Parameter	**Daily Maximum**
Temperature	(1) 104°F / 40°C
pH	(1) 5.5 - 10.0

Total Suspended Solids	(2)
BOD_5	(2)
Copper	(3) 0.84 mg/L
Mercury	(3) 0.0031 mg/L
Non-Polar Material (SGT-HEM)	(3) 26 mg/l

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(1) Local Sewer Use Ordinance
(2) Organic pollutants may be revised to limit the concentration which may be discharged without paying a surcharge.
(3) Process wastewater per 40 CFE 442.15 pretreatment standards for existing sources.

Rational for Effluent Limits: These limits are based on categorical pretreatment standards set forth in Code of Federal Regulations (40 CFR 442.15) and local sewer use ordinance.

Monitoring Requirements: Effective no later than the effective date of the current permit (June 1, 2013), and lasting until the expiration date of the current permit (May 31, 2014), Grace Trailer Service LLC is authorized to discharge wastewater to the West Memphis wastewater collection system. These discharges shall be monitored as follows:

Parameter	Sample Frequency	Type Sample
Temperature	2/month	Grab
pH continuous	record	Grab
Total Suspended Solids	2/month	24-hr Composite
BOD_5	2/month	24-hr Composite
TPH (Non-Polar Material)	2/month	Grab
Copper	2/month	24-hour Composite
Mercury	2/month	24-hour Composite

Monitoring location is the V-Notch weir located on the discharge line that is located at the small building east of the pretreatment facility.

Reporting requirements: Industrial user reporting requirements will be in accordance with those outlined in the Industrial User Permit. All required reports must be submitted on a monthly basis.

Brief Compliance History: On the last annual PPs they were in compliance.

Attachment A-4

WEST MEMPHIS UTILITY COMMISSION

P.O. Box 1868 604 East Cooper
(870) 735-3355
West Memphis, Arkansas 72301

INDUSTRIAL WASTES DISCHARGE PERMIT

Permit No. 25

In accordance with the provisions and conditions of the City of West Memphis Ordinance No. 2187

Stateside Steel and Wire, LLC
304 Wyanoke Road
West Memphis, Arkansas 72301

Is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the West Memphis wastewater collection system in accordance with conditions set forth in this permit. Compliance with this permit does not relieve the User of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, state, and federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of West Memphis Ordinance No. 2187.

This permit shall become effective on: July 1, 2013
And shall expire at midnight on: June 30, 2016

This permit is not transferable to persons, companies, or processes other than those to which it is originally issued.

Signed:

John Rimmer
General Manager

Denise Bosnick
Director of Environmental Quality

PART I- EFFLUENT LIMITATIONS

1) During the period of July 1, 2013 to June 30, 2016 the User is authorized to discharge process wastewater to the City of West Memphis wastewater collection system from the outfall listed below:

Outfall: Discharge point located on the northeast side of the building.

2) During the period of July 1, 2013 to June 30, 2016 the discharge from the above outfall shall not exceed the following effluent limitations.

	Effluent Limitations	
Parameter	Daily Maximum	Monthly Average
Oil and Grease	1) 100 mg/L	
Temperature	1) 104 F° / 40 C °	
pH	1) 5.5-10.0	
Total Suspended Solids	2)	
Cadmium	3) 0.69 mg/L	3) 0.26 mg/L
Chromium	3) 2.77 mg/L	3) 1.71 mg/L
Copper	3) 3.38 mg/L	3) 2.07 mg/L
Cyanide	3) 1.20 mg/L	3) 0.65 mg/L
Lead	3) 0.69 mg/L	3) 0.43 mg/L
Nickel	3) 3.98 mg/L	3) 2.68 mg/L
Silver	3) 0.43 mg/L	3) 0.24 mg/L
Zinc	3) 2.61 mg/L	3) 1.48 mg/L
TTO	3,4) 2.13 mg/L	

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1) Local sewer use ordinance.
2) Organic pollutants may be revised to limit the concentration, which may be discharged without paying a surcharge.
3) Process wastewater per 40 CFR 433.16 pretreatment standards for existing sources.
4) See Permit Part IV, 8

Attachment A-5

WEST MEMPHIS UTILITY COMMISSION
P O Box 1868 604 East Cooper
West Memphis, AR 72303
Phone (870) 735-3355 Fax (870) 732-7623

Industrial Inspection Report

Inspector Name(s): Denise Bosnick and Marvin Jones

Inspection Date and Time: September 18, 2013/ 9:30 am

Industry Name: Grace Trailer Service

Site Address: 615 Petro Cove

Contact Name and Title: Chris Fox/ Owner

Telephone Number: 732-0404

North American Industrial Classification Number: 811193

Industrial Discharge Permit: 24

Expiration Date: May 31, 2014

Category: Categorical (Transportation Equipment Cleaning)

Other Permits:

Description of Activity on Premises: Specializes in cleaning both interior and exterior tractor trailer truck they also have a tractor trailer repair shop.

Regulated Process Area : First bay for exterior washing and dry bulk products. Between Bay 1 and 2, there is a boiler room where some chemicals such as soap, aluminum brightener and caustic is kept for use in the process. Bay 2, 3, 4, are for interior wash. Bay 5 is for steam cleaning. In Bay 2,

there are five drums. These drums contain all resins. Hazardous Waste Accumlation Station-Rq waste resin solution resin mixture-Flammable. Resin Solution 102TA AOC Resin only day. Resin Solution-other resin not 102TA-day only. Resin Solution 102TA AOC resin only-night. Resin Solution-other resins not 102TA AOC resin only-night. All water goes thru a grated trench drain starting at Bay one. This goes into a collection vat located at Bay 5. That vat is piped under the parking area and goes to a mop unit/ oil removal system. The water then goes to a collection vat in the pump house. This vat is equipped with Ph and temperature monitor and an aeration system. It then goes too an 8,000 gallon storage tank to an above ground flume. The water is then discharged to the City sewer. There is a spare 8,000 gallon tank if needed.

Pretreatment Area: This area is explained in the Regulated Process Area. The waste water goes thru three collection vats and into an 8,000 gallon tank and then into a flume that goes to the City sewer.

Chemical Storage Area: Is one covered containment are with diversionary structures. This area is divided into Hazardous Waste Storage, Bulk Chemical Storage and an area for Corrosives. There are a limited amount of chemicals stored in several areas around the wash rack facility. All are on containment pallets. There is also a limited amount stored in the pump house that is used in the treatment process. This is also in containment.

Waste Storage Area: In with the Chemical Storage.

Hazardous Waste Generator: Yes

Identification Number: EPA I.D. No ARR000006379

Spill Prevention/Slug Control Plan: Yes

Material Safety Data Sheets Available: Yes

Sampling Information: Twice Monthly

Discharge Monitoring Location: The v-notch weir located at the small building east of the pretreatment facility.

Other Field Notes:

Inspector Signature: (print) Denise Bosnick

Inspector Signature: (sign) Denise Bosnick

A-5c