

ADEQ

ARKANSAS
Department of Environmental Quality

JAN 2 2014

Gregg Rainey
Superintendent
Clarksville Light & Water
P.O. Box 1807
Clarksville, Arkansas 72830

Re: City of Clarksville (NPDES #AR0022187) Pretreatment Program Audit/
Municipal Pollution Prevention (P2) Assessment

Dear Mr. Rainey,

Please find enclosed the finished report for the audit/assessment conducted November 19 – 21, 2013. The contents should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the deficiencies and recommendations.

Please respond in writing within thirty (30) days of the date on this correspondence to the required actions and recommendations. Please indicate what actions will be taken to correct the deficiencies and in what time frame.

In this auditor's opinion, the City has a staff well qualified and involved in the Program and its implementation. They should be lauded for their efforts. Your public outreach efforts regarding various environmental and the City's collection system issues will, in the future, help the citizens of Clarksville become more involved stakeholders.

It is always a pleasure working with you and your staff and becoming more familiar with Clarksville, its industries, Pretreatment and Pollution Prevention Programs.

Feel free to contact this office with any questions at (501) 682-0625 or gilliam@adeq.state.ar.us.

Sincerely,



Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist with Attachments

cc: Rudy Molina/EPA 6WQ-PO
Craig Uyeda, Enforcement Branch Manager
Jason Bolenbaugh, Inspector Supervisor

PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT
CITY OF CLARKSVILLE, ARKANSAS

NPDES PERMIT #AR0022187

December 17, 2013

PREPARED BY: ALLEN GILLIAM
ADEQ STATE PRETREATMENT COORDINATOR

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LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation

A) INTRODUCTION

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

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

An audit/assessment was performed November 19 through 21, 2013, of the Pretreatment Program implemented by the City of Clarksville (City Light and Water), Arkansas. Participants included:

Allen Gilliam	ADEQ/State Pretreatment Coordinator
Pam Smith	CL&W/Pretreatment Coordinator
Greg Rainey	CL&W/Wastewater Superintendent
John Lest	CL&W/General Manager

The goals of the audit/assessment were:

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

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

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

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

Clarksville's Pretreatment Program was originally approved 3/1/83.

Program modifications were submitted, approved and incorporated on 10/27/94 and then again on 3/20/2002. Modifications included a headworks loading re-evaluation; incorporation of an Enforcement Response Plan; narrative changes to the City's Pretreatment Program and Ordinance.

Streamlining modifications were submitted by the City on 3/16/10. Their new Pretreatment Ordinance was approved and adopted on 2/13/12. Remaining Program narrative Sections and Appendices were piecemeal submitted up until 11/12/13 and are currently being reviewed for final

approval of the complete Pretreatment Program Modification to be current with the Streamlining revisions to the Federal Pretreatment Regulations in 40 CFR 403.

The City has two (2) wastewater treatment plants. One (outfall 002) is a simple three (3) cell extended lagoon designed to handle wet weather flow only (no industrial contributions) and would be fed back to the main POTW for treatment as conditions warrant.

The main plant (outfall 001) consists of primary extended aeration, activated sludge with oxidation ditches, followed by secondary clarification, after which there's chlorination. Dechlorination is accomplished with sulfur dioxide and a cascade waterfall before discharge to the receiving stream which is Lake Dardenelle. The plant's effluent has not exhibited any toxic characteristics according to recent whole effluent toxicity testing over the last three (3) years.

The POTW has a design flow of 2.0 MGD (including the holding lagoon) and an average flow of ~0.75 MGD. Approximately 16% of that is currently from three (3) significant industrial contributors, one (1) of which is a categorical metal finisher.

Approximately 96 dry tons of "Class B" quality biosolids were land applied in 2012. Yearly application rates vary widely from year to year depending on the tonnage accumulated, ready to be applied.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to their three (3) significant industrial users. 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 in Attachments A-1 through A-10.

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 Clarksville. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of 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)(B). "...individual mechanisms [permits]...must be enforceable and contain, at a minimum, the following conditions: ...*(3) Effluent limits, including Best Management Practices [BMPs], based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law...*"

Greenville Tube's permit must be modified to include a requirement to implement their approved Toxic Organic Management Plan (TOMP) submitted (Attach. A-4). Under the 9/05 Streamlining Rule, TOMPs are considered BMPs. This required language could easily fit in the City's current permit to Greenville Tube in its "Section D. Monitoring and Records" section.

1a) Either remove the BMPs requirement or elaborate further on what is required for the other two (2) non-categoricals BMPs' narrative "standard" shown on their limit page (see Attach. A-2b).

This BMP requirement is confusing and makes no sense if there are no "specific schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in §403.5(a)(1) and (b) or treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage." See definition of Best Management Practices in *40 CFR 403.3(e)*.

2) Under 40 CFR 403.12(j), "Notification of changed Discharge. All Industrial Users shall promptly notify the Control Authority...in advance of any substantial change in the volume or character of pollutants in their Discharge..."

During the file review it was discovered Greenville Tube had ceased a major process at its facility -- tube making through mill rolling operations. To this auditor's knowledge the wastewater generated from this operation never entered their normal discharge to the City, but Greenville Tube must update its TOMP which describes this operation. See Attach. A-4c. paragraph 4.

Greenville must review its old TOMP, update any part of it which has changed since its last revision dated 2/09 and resubmit to the City in a given time period. It does not have to be revised nor stamped by a professional engineer, just a qualified professional familiar with Greenville's operations, processes and chemicals.

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

1) Continue conducting comprehensive industrial/non-domestic user surveys. Summarize all of the surveys into a succinct, digested document with only the pertinent information (business name, location, primary contact name, any chemicals on-site with a potential or probable discharge to the City, etc.) should be collected from each survey. Those businesses that only discharge “domestic sewage” could be kept in a separate file entitled as such; therefore, the justification not to be surveyed again.

The City may wish to choose a business sector and customize the questions to “fit” the sector’s typical activities. In this way, the City could target and collect more comprehensive information. Car washes, radiator shops, auto body repair shops, machine shops, dentist offices/clinics, long term health care facilities, etc. are some examples of “sectors”. Pollution Prevention (P2) questions regarding toxic chemicals’ reduction, employee training, water and energy reduction practices are some that could be asked.

2) Recommend including more pertinent information on each of the permitted industries’ fact sheets. Attachment A-5 is an example of what the City is currently using. Start-up date, compliance history, a comprehensive narrative description of their manufacturing/production operations, an updated (and dated) wastewater flow schematic, permit limits’ rationale/basis, actual permit limits, why they are considered “Significant”, etc. would be a few pertinent facts to include. These fact sheets could be sent to the industry representative to fill out for their knowledgeable input.

It was discussed during the Audit the two (2) non-categorical permitted industries’ limitations are “performance-based on the facilities’ current treatment technology”. These are valid “local limits” and should be referenced as such in their fact sheets with a comprehensive description of their treatment processes.

The City was supplied Appendix D from EPA’s newly revised “Industrial User Permitting Guidance Manual” (9/1/12 @ Permit Manual (PDF)) via this office’s e-mail on 8/13/13 for more information to possibly add to fact sheets.

3) Recommend including more narrative on the City’s IU Inspection forms (or see below paragraph). Sections of the current forms are not very comprehensive (see Atch. A-7). Actual identification of regulated wastewater sources, “manufacturing” operations, proper O&M of wastewater treatment processes (rust, leaks, mixers, etc.), chemical storage/handling procedures, secondary chemical containment are vague/general in nature.

It is suggested to require the City’s industries to submit a comprehensive process narrative matched to an updated wastewater flow schematic. With these in-hand and included near the industries’ fact sheets, the City’s inspections could simply refer to them in the inspection report (“manufacturing or production processes described in IU’s file”, e.g.). The City could even send the latest inspection reports and fact sheets to their industry contacts and ask them to improve them to make them more

comprehensive.

Greenville Tube's Toxic Organic Management Plan (TOMP, revised February, 2009; Atch. A-4) has a quality process narrative although it does not include a flow schematic showing from where the regulated wastewater is generated to where it is actually discharged/sampled.

4) Recommend permit applications include BMP or pollution prevention (P2) activity questions. A definition could be included with the question: "Pollution should be *prevented or reduced* at the source whenever feasible. Are you accomplishing this through increased efficiency in the use of raw materials, energy, water, or other resources, protection of natural resources by conservation?" During the site visits, it was recognized both Hanesbrand and Bright Harvest were already practicing some of the P2/BMP basics (inventory control, heat recovery and water conservation respectively).

Other questions could include: "Are any P2/BMP activities currently underway such as employee training, inventory control, reduction in toxic releases, in-process recycle, countercurrent rinsing, water/energy conservation, best management practices, any manufacturing certification programs they are in, etc."

5) Recommend sending out the hazardous waste notification under 40 CFR 403.12(p) to the generators with connections to the City's collections system. Small quantity and conditionally exempt generators are prone to move about or open shop anywhere around the state and need to be kept current on their Pretreatment regulatory obligations. ADEQ's most current list of generators was provided to City personnel during the Audit.

6) Permitted industries' definition section should better describe, if not simply state in the definition section, "All 24 hr. composites will be timed composites" (see Atch. A-2e).

7) Strongly recommend developing standard operating procedures for the day-to-day activities performed by the city's pretreatment personnel. This should be located in the City's Pretreatment Program as a non-substantial modification. Data management (handling/tracking/logging in with date stamp) of industry correspondence, inspection protocols specific to the city's industrial users and other "common knowledge" procedures actually documented would be very useful to help educate and cross train other City personnel in the Pretreatment Program's procedures.

8) Recommend continuing to include fliers to be included in the City's residents' water/sewer bills helping educate them on pharmaceutical take-back programs, phosphorous containing soaps/detergents, proper disposal of grease and what problems it can cause to the City's collection system.

If the City is subject to total phosphorous limits in a future permit, specific contributors of phosphorous above domestic background levels should be identified for possible future permitting.

D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS

Submit the remainder of the City's Pretreatment Program narrative sections to be current with the revised ("streamlined") version of the National Pretreatment Regulations in 40 CFR 403. The City's Pretreatment Ordinance has been received and is pending review. The Program sections should be reviewed to ensure it matches the required procedures added or revised in the proposed Ordinance.

The City's Program Modifications are almost complete and approved to be current with the Streamlining revisions to the Federal Pretreatment Regulations in 40 CFR 403. There are but a few Sections which need to be finalized and submitted for approval.

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	Pages 1- 4
Section II:	Pretreatment Program Analysis	Pages 5-16
Section III:	Industrial User File Evaluation	Pages 17-24

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: Clarksville Light & Water NPDES #: AR0022187
 Mailing address: P.O. Box 1807, Clarksville, AR 72930

Permit Signatory: Gregg Rainey Title: W.W. Superintendent

Telephone: 479.754.7929 Fax Number: 479.754.8181

Pretreatment Contact: Pam Smith Title: Pretreatment Coordinator
 Address: 1305 South Crawford
 Telephone: Same as above
 E-mail pam.smith@clarksvillelightwater.com
 Pretreatment program approval date: 2/14/83

Dates of approval of any substantial modifications: 10/27/94 & 3/20/02

Month Annual Pretreatment Report Due: February

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 11/19 - 11/21/13
 (ASSESSMENT)

Inspector(s):

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
<u>Allen Gilliam</u>	<u>Pret. Coord./ADEQ</u>	<u>501.682.0625</u>

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>*Pam Smith</u>	<u>Pretreatment Coordinator</u>	<u>479.754.7929</u>
<u>Gregg Rainey</u>	<u>Wastewater Superintendent</u>	<u>"</u>
<u>+John Lester</u>	<u>General Manager</u>	<u>479.654.3148</u>

* Identifies Program Contact +Exit Interview only

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>3/17/11</u>	<u>No apparent problems noted</u>

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 an 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
AR0022187	Clarksville Light & Water	4/1/09	3/31/14

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Clarksville Light & Water Pollution Control Facility
Location Address: 1305 South Crawford, Clarksville
(*includes a separate 3-cell lagoon - outfall #002 which is an MCR 3 cell lagoon for heavy rain events)

Treatment Plant Wastewater Flow: Design- 2.0 MGD; Actual (Avg)- 0.749 MGD

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

Industrial Contribution to this Treatment Plant

of SIUs: 3 # of CIUs: 1

Industrial Flow (gpd): 120,000 Industrial Flow (%): 16.02

*2 IUs have increased production/flow

Level of Treatment

Type of Process(es):

Primary (#002) three cell extended lagoon

Secondary (#001) primary extended aeration activated sludge; oxidation ditch; final clarification and post aeration

Tertiary _____

Method of Disinfection: chlorination

Dechlorination (SO₂) YES NO (still have cascade waterfall/step aerator)

Effluent Discharge

Receiving Stream Name: Backwaters of Lake Dardenelle

Receiving Stream Classification: Segment 3H in the AR River Basin

Receiving Stream Use: primary contact rec./raw water source for domestic, industrial and agri., propagation of desirable species of fish and other aquatic life.

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

Method of Sludge Disposal:

Quantity of Sludge: (2012)

<input checked="" type="checkbox"/> Land Application	<u>96.3</u> dry metric tons/yr. (Class B)
<input type="checkbox"/> Incineration	_____ dry tons/yr.
<input type="checkbox"/> Monofill	_____ dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	_____ dry tons/yr.
<input type="checkbox"/> Public Distribution	_____ dry tons/yr.
<input type="checkbox"/> Lagoon Storage	_____ dry tons/yr.
<input type="checkbox"/> Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: #001 & #002 - conventionals, TRC, WET & NH₃-N

SECTION I: GENERAL INFORMATION

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

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

Issuing Authority: same
 Issuance Date: "
 Expiration Date: "

List pollutants that are specified in current sludge permit:
All CFR 503 requirements

YES NO N/A Has the Control Authority submitted results of whole effluent biological toxicity testing.

YES NO N/A Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) No lethality nor sub-lethality shown in either species within the last 3 years.

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u>2</u>	<u>-</u>
Priority **	<u>1</u>	<u>1</u>	<u>-</u>	<u>-</u>
Biomonitoring	<u>-</u>	<u>2</u>	<u>-</u>	<u>-</u>
TCLP	<u>-</u>	<u>-</u>	<u>1</u>	<u>-</u>
Other: _____	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>

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

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

"Stayed about the same"

YES NO N/A

YES NO N/A Has the POTW begun tracking the trends in the above samples?

YES NO N/A 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)

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>CHODS (9/25/13)</u>	<u>Too much polymer (results depleted)</u>
<u>TSS (5/31/13)</u>	<u>Water fleas</u>

YES NO

YES NO N/A 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.

City submitted a modified (then approved) Ordinance #12-651 back in March '10 along with the check-list. Other program sections' reviews are outstanding. The City requested a re-evaluation of their MAHs/MAILs. New spreadsheets were supplied to the City by ADEQ in 5/13 based on the City's latest site specific data.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation #12-651 Nature of Modification	Date Incorporated in NPDES Permit
<u>Pending</u>	<u>Entire program to be current w/Streamlining mods in CFR 403</u>	

2. Modifications in Progress:

Date Requested	Nature of Modification
<u>3/15/13</u>	<u>Re-aval of MAILs, ERP revisions and other non-substantial Program section modifications.</u>

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

 n/a Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

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

Date of original Pretreatment Program approval: 3/1/83 [WENDB-PTIM]

Date of most recent Ordinance approved by the Control authority: 2/13/12

Date of most recent Pretreatment Program modification approval: 3/20/02

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? *Adopted "P2" purpose in Pretreatment Ord. #12-651

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: _____

YES NO

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

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

n/a Have provisions been made for the incorporation of Pollution Prevention (P²) 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. <u>n/a</u>			

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

Problems

<input type="checkbox"/> Updating industrial waste survey	<u>n/a</u>
<input type="checkbox"/> Notification of IUs	_____
<input type="checkbox"/> Permit issuance	_____
<input type="checkbox"/> Receipt and review of IU reports	_____
<input type="checkbox"/> Inspection and sampling of IUs	_____
<input type="checkbox"/> Assessment of IUs for P ² activity	_____
<input type="checkbox"/> Analysis of samples	_____
<input type="checkbox"/> Enforcement	_____
<input type="checkbox"/> 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
<u>n/a</u>	_____		

SECTION II: PROGRAM ANALYSIS AND PROFILE

E. Industrial User Characterization [403.B(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.B(f)(2)(i)] City conducted one on 4/08 & 6/08. The next survey is planned for 2014.

✓ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P2 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.B(f)(2)(i)]

 ✓ If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P² activity and the distribution of P2 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) city inspector

Size of city does not dictate a comprehensive system

How often is the survey to be updated? ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: None apparent

YES NO

 ✓ Have any new SIUs been identified within the last 12 months? If yes:

Name of IU	Type of Industry	Is the IU Permitted?
n/a		

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

- a. 3 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 1 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 2 Noncategorical SIUs
- d. 0 Other regulated nonsignificant IUs (Describe) _____
- 3 TOTAL of a. + d.

✓* Has the POTW identified any IUs with Pollution Prevention opportunities?
**The City's SIUs are implementing P2 activities.*

✓ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1)(i-ii)]

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)]

 Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

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

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

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

IU NAME	PERMIT EXPIRATION DATE
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

 Does the Control Authority accept trucked septage wastes?

 Does the Control Authority accept other trucked wastes?

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

- n/a Does Control Mechanism designate a discharge point? [403.5(b)(9)]
- 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
<u> n/a </u>	<u> </u>

Describe the discharge point(s) (including security procedures):
 n/a

- Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?
- Does the Control Authority have a control mechanism for regulating wastes from UST sites?

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

Pollutant	Limit
<u> n/a </u>	<u> </u>

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?

2/4/09 Date Notified Letter Method of Notification

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

 Federal Register Journals, Newsletters
 Meetings, Training Other internet
 Government Agencies Other

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
N/A	City has submitted correspondence that local limits are not necessary with no mention of any other pollutants than the "normal" FOCs.		

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Developed in 5/13 & now used on their inf/eff summary sheet for their annual reports Numerical MAHCs used (ug/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	5.45
Cadmium (Cd)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	5.35
Chromium-Total	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	154.2
Copper (Cu)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	134.6
Cyanide (CN)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	18.7
Lead (Pb)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	55.3
Mercury (Hg)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	0.27
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	8.1
Nickel (Ni)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	49.2
Selenium (Se) *	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	8.4
Silver (Ag)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	36.1
Zinc (Zn)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	500.0

* - If necessary for the sludge disposal option chosen.

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:

<u>POLLUTANT</u>	<u>Headworks Analysis Completed?</u>		<u>Local Limits Needed?</u>		<u>Local Limits Adopted?</u>		<u>Numerical Limit Adopted (mg/l)</u>
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	
<u>n/a</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>"Not known yet, but possibly"</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>T.Phos 5</u>	<u> </u>	<u> </u> <input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>NO3 + NO2</u>	<u> </u>	<u> </u> <input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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

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

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:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
Inspections:			
CIUs	<u>1/yr</u>	1/year	<u>N/A</u>
Other SIUs	<u>"</u>	1/year	<u>"</u>
Sampling:			
CIUs	<u>4 to >4/yr</u>	1/year	<u>Better compliance assurance</u>
Other SIUs	<u>"</u>	1/year	<u>"</u>
Reporting:			
CIUs	<u>12/yr</u>	2/year	<u>To keep a good handle on</u>
Other SIUs	<u>12 to 24/yr</u>	2/year	<u>WW characteristics</u>
Self-Monitoring:			
CIUs	<u>12/yr</u>	2/year	<u>Varies per industry</u>
Other SIUs	<u>12 to 24/yr</u>	2/year	<u>for CBOD & TSS</u>

<u>#</u>	<u>%</u>	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
<u>0</u>	<u>0</u>	Not sampled at least once in the past reporting year?
<u>0</u>	<u>0</u>	Not inspected at least once in the past Pretreatment reporting year?
<u>0</u>	<u>0</u>	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?
 To verify IU self-monitoring results?

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

	<u>Analytical Method *</u>	<u>Name of Laboratory</u>
Metals*	<u>ICP/MS</u>	<u>American Interplex (AI)</u>
Cyanide	<u>spectro</u>	<u>AI</u>
Organics	<u>GC/MS</u>	<u>"</u>
Other	<u>WET / Hq*</u>	<u>Huther / AI</u>

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

* Enter the type of Analytical Method used for each group of pollutants (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, *1631E etc.).

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe: City
relies on EPA and State's certification requirements. They are using more
clean hand/dirty hand sampling techniques now and have sent splits & knows to
different labs to compare data. (No changes from previous audit)

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

5days Conventionals
1 wk Metals
2 wks Organics

Is there an established protocol clearly detailing sampling location and procedures? *Actual pictures exist in SIUs' files, but no specific written procedures.

Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: N/A

Does the Control Authority use the following methods for compliance monitoring?

YES NO

Scheduled compliance monitoring
 Unscheduled compliance monitoring
 Demand monitoring for IU compliance
 IU self-monitoring
 Other: _____

YES NO

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

I. ENFORCEMENT

YES NO

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

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

YES NO

Describe how the Control Authority will investigate instances of noncompliance

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

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

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

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)]

- | | | | |
|-------------------------------------|--------------------------------|-------------------------------------|----------------------------------|
| <input checked="" type="checkbox"/> | Notice or letter of violation | <input checked="" type="checkbox"/> | Administrative Order |
| <input checked="" type="checkbox"/> | Setting of compliance schedule | <input checked="" type="checkbox"/> | Revocation of permit |
| <input checked="" type="checkbox"/> | Injunctive relief | <input checked="" type="checkbox"/> | Fines (maximum amount): |
| | | | |
| | civil | \$ | <u>1000</u> /day/violation |
| | criminal | \$ | <u>1000</u> /day/violation |
| | administrative | \$ | <u> </u> /day/violation |
| <input checked="" type="checkbox"/> | Imprisonment | | |
| <input checked="" type="checkbox"/> | Termination of Service | | |
| | Other: _____ | | |

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

YES NO

 When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
*See Attech. A-1 for example.

 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	Enforcement Action		Return to Compliance?	
	in SNC	Type	Date	Yes (Date)	No
n/a					

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

#	%	
<u>0</u>	<u>0</u>	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
<u>0</u>	<u>0</u>	Self-monitoring requirements [WENDB-MSNC]
<u>0</u>	<u>0</u>	Reporting requirements [WENDB-PSNC]
<u>0</u>	<u>0</u>	Pretreatment compliance schedule [WENDB-SSNC]
<u>0</u>	<u>0</u>	How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

Has the Control Authority experienced any of the following:

EXPLAIN and ID Industrial User

- | <u>YES</u> | <u>NO</u> | |
|-------------------------------------|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Interference [WENDB]. _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Pass through [WENDB]. _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Fire or explosions?
(incl. flash point viol.) _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Corrosive structural damage?
(incl. pH <5.0). _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Flow obstructions? _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Excessive flow or
pollutant concentrations? _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Heat problems? _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Interference due to oil
or grease? _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Toxic fumes? _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Illicit dumping of
hauled wastes? _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Does the Control Authority compare all monitoring data to applicable
Pretreatment Standards and requirements contained in the control mechanism?
[403.8(f)(2)(iv)] |
| <input type="checkbox"/> | <input type="checkbox"/> | 0 How many SIUs are currently on compliance schedules? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 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:

	<u>Number</u>	<u>Amount</u>
Civil	0	\$ _____
Administrative	0	\$ _____
Total	0	\$ 0 [WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

- | | | |
|-------------------------------------|--------------------------|----------------------------------------------------------------------------------------------------------|
| <u>YES</u> | <u>NO</u> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Are inspection & sampling records well documented, organized and readily retrievable? Are files/records: |

- | | | |
|-------------------------------------|--------------------------|--------------|
| <u>YES</u> | <u>NO</u> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | computerized |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | hard copy |
| <input type="checkbox"/> | <input type="checkbox"/> | OTHER: _____ |

Are the following files computerized:

- | | | |
|-------------------------------------|-------------------------------------|-----------------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Control Mechanism Issuance |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Inspection and Sampling schedule |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Monitoring Data *See Atatch. A-10 for example |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | IU Compliance Status Tracking |
| <input type="checkbox"/> | <input type="checkbox"/> | Other: _____ |

SECTION II: PROGRAM ANALYSIS AND PROFILE

Can IU monitoring data can be retrieved by:

YES NO

- Industry name
- Pollutant type
- Industrial category or type
- SIC Code
- IU discharge volume
- Geographic location
- Receiving treatment plant (i.e. if > one plant in the system)
- Other (specify) _____
- Does the POTW have provisions to address claims of confidentiality?
[403.8(f)(1)(vii)] Ordinance language only

Have IUs requested that data be held confidential?
How is confidential information handled by the Control Authority?
n/a

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

If yes, please explain: Possible future nutrient limits may cause the City some problems.

- 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

Approx. 1.5 ("when necessary")

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

<input checked="" type="checkbox"/> POTW general operating fund	<u>100</u>
<input type="checkbox"/> IU permit fees	_____
<input type="checkbox"/> monitoring charges	_____
<input type="checkbox"/> industry surcharges	_____
<input type="checkbox"/> other (describe) _____	_____
Total	100%

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

<u>YES</u>	<u>NO</u>		<u>If no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Legal assistance	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Permitting	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	IU inspections	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample collection	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample analyses	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data analysis, review and response	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enforcement	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Administration (inc. record keeping /data management)	_____

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>		<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	Standard equip _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	" _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	" _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	" _____

L. POLLUTION PREVENTION Basically, no changes since last audit in '10.

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.):
Inspection forms have P2 questions
2. Has the source of any toxic pollutants been identified?
 If yes, what was found?
No
3. Has the POTW implemented any kind of public education program? If yes, describe:
Standard plant tours for high school and college kids; they send out quarterly newsletters with their utility bills
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 Hanesbrand File/ID No. #2
Industry Address: 1904 Cline & Clark Rd., P.O. Box 669
Industry Description Nylon fabric weave and dye for hosiery products
Industrial Category n/a 40 CFR n/a SIC/NAICS Codes: 2251/31511 & 313112
Avg. Total Flow (gpd) 180,000 Avg. Process Flow (gpd) 118,000

Industry visited during audit: YES

Comments: Facility "yarns" ~20,000 lbs/yr. Their dyes, other finishes and yarn oils make up ~1,000 lbs/yr.

FILE #: 2 Industry Name Bright Harvest File/ID No. #1
Industry Address P.O. Box 528, 72830
Industry Description Sweet potato processing
Industrial Category n/a 40 CFR n/a SIC/NAICS Codes: 2037/311411
Avg. Total Flow (gpd) 174,000 Avg Process Flow (gpd) 174,000

Industry visited during audit: YES

Comments: Daily process flow fluctuates widely from 0 to 0.5 MGD

FILE #: 3 Industry Name Greenville Tube Corp. File/ID No. #6
Industry Address 501 South Montgomery St. 72830
Industry Description Stainless steel tube drawing
Industrial Category Metal Finisher 40 CFR 433 SIC/NAICS Codes: 3317/331210 & 331491
Avg Total Flow (gpd) 21,000 (questionable) Avg Process Flow (gpd) 4,000

Industry visited during audit: YES

Comments: Citric acid passivation on SS steel tube used now. Facility no longer rolls/welds its own tube products. They bring the coiled tube in from an outside source. They have their own artesian well for an additional water source.

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:

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism (See Attch. A-2 for example permit)

1. Does the file contain an application for a control mechanism? (See Attch. A-3 for example)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>
If yes, what is the application date?	<u>5/11</u>	<u>5/18</u>	<u>10/08</u>	<u>_____</u>	<u>_____</u>
Does it ask for Pollution Prevention information?	<u>no</u>	<u>no</u>	<u>no</u>	<u>_____</u>	<u>_____</u>
2. Does the file contain a Permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>
Permit Expiration Date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>
Is a fact sheet included?	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>
b. Expiration date?	<u>8/16</u>	<u>5/18</u>	<u>1/14</u>	<u>_____</u>	<u>_____</u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>
d. Appropriate discharge limitations?	<u>2</u>	<u>2</u>	<u>2</u>	<u>_____</u>	<u>_____</u>
e. Appropriate self-monitoring requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>

Comments: 1) See Attch. A-5 for example; 2) "Best Management Practices" on permit limits' page (Attch. A-2b) were not substantiated anywhere else in the permit with any further explanation of what schedules of activities, prohibitions of practices, maintenance procedures were required.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Sampling locations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
i. Types of samples (grab or composite) for self-monitoring?	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>	<u> </u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
Civil and Criminal Penalty provisions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
Revocation of permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
l. Compliance schedules/ progress reports	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>	<u> </u>
m. General/Specific Prohibitions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>	<u> </u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>2,3</u>	<u>2,3</u>	<u>✓</u>	<u> </u>	<u> </u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>	<u> </u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>	<u> </u>

Comments: 1) Definition section should state "composites" are all 24 hr timed composites; 2) Basis for limits should be explained in fact sheets; and 3) These facilities' permit limits are basically performance based on current IU's treatment technology.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____	_____
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
D. <u>Compliance Monitoring Sampling</u>					
1. Does the file contain Control Authority and IU sampling results?	<u>1</u>	<u>✓</u>	<u>✓</u>	_____	_____
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
3. Does the sampling report(s) include: [403.8(f) (2) (v1)]					
a. Name of sampling personnel?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
b. Sample date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
c. Sample type?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
d. Wastewater flow at the time of sampling?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
e. Sample preservation procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
f. Chain-of-custody records?	<u>3</u>	<u>✓</u>	<u>✓</u>	_____	_____
g. Results for all parameters? SIUs & CIUs [403.12(g) (1) - CIUs]	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
4. Has the Control Authority appropriately implemented all applicable TFO monitoring/management requirements?	<u>n/a</u>	<u>n/a</u>	<u>2</u>	_____	_____

Comments: 1) See Atch. A-6 for example; 2) Excellent TOMP submitted. See Atch. A-4. Needs to be updated since facility does not form/weld tubing via mills anymore. They bring in pre-tube forms now; 3) See Atch. A-9 for example.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>timed</u>	<u>timed</u>	<u>timed</u>	_____	_____
6. Were 40 CFR 136 analytical methods used? [403.8(f) (2) (vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
<u>Inspections (See Atatch. A-7 for example)</u>					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(e)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
b. Date of last Inspection	<u>10/13</u>	<u>10/13</u>	<u>10/13</u>	_____	_____
9. Does the inspection report(s) include: [403.8(f) (2) (vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
d. Verification of production rates?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____	_____
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>1</u>	<u>1</u>	<u>1</u>	_____	_____
f. Evaluation of pretreatment facilities?	<u>1</u>	<u>1</u>	<u>1</u>	_____	_____
g. Evaluation of self-monitoring equipment and techniques?	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____	_____
h. Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]	<u>2</u>	<u>✓</u>	<u>✓</u>	_____	_____

Comments: 1) Could be more comprehensive with more narrative (leaks, rust, proper O&M etc.); 2) See Atatch A-8 for example.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
i. Manufacturing facilities?	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>	<u> </u>
j. Chemical handling and storage procedures?	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>	<u> </u>
k. Chemical spill prevention areas?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
l. Hazardous waste storage areas and handling procedures?	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>	<u> </u>
m. Sampling procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
n. Laboratory procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>	<u> </u>
o. Monitoring records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
p. Evaluation of Pollution Prevention opportunities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
q. Control Authority inspector signature?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
<u>IU Self-Monitoring and Reporting</u>					
10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
11. Does the file include:					
a. BMR?	<u>n/a</u>	<u>n/a</u>	<u>arch.</u>	<u> </u>	<u> </u>
b. 90-Day Report?	<u>n/a</u>	<u>n/a</u>	<u>arch.</u>	<u> </u>	<u> </u>
c. All periodic reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>	<u> </u>
12. Did the IU report on all required parameters?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
13. Did the IU comply with the required sampling frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
14. Did the IU report flow?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
15. Did the IU comply with the required reporting frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>

Comments: 1) Could be more comprehensive with more narrative.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>no</u>	<u>no</u>	<u>_____</u>	<u>_____</u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>_____</u>
b. Did POTW respond to the spill?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>_____</u>
E. Enforcement					
1. Were all IU discharge violations identified in: [403.8(f) (2) (vi)]					
a. Control Authority monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>
b. IU self-monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>_____</u>	<u>_____</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>3</u>	<u>_____</u>	<u>_____</u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>_____</u>	<u>_____</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u> </u>	<u> </u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u> </u>	<u> </u>
6. Was the IU notified of all violations?	<u>✓</u>	<u>✓</u>	<u>n/a</u>	<u> </u>	<u> </u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/n</u>	<u>n/n</u>	<u>n/n</u>	<u> </u>	<u> </u>
8. Did the Control Authority follow its approved ERP?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>	<u> </u>
11. Were there any compliance schedule violations?	<u>--</u>	<u>--</u>	<u>--</u>	<u> </u>	<u> </u>
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
b. TRC	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
c. Pass through/Interference	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
d. Spill/slug loads	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
e. Reporting	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
f. Compliance schedule	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>	<u> </u>
g. others (specify)	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
13. Was the SIU published for SNC?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>	<u> </u>
Date of publication.	<u>--</u>	<u>--</u>	<u>--</u>	<u> </u>	<u> </u>

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Clarksville NPDES #: AR0022187

Date of Audit: 11/19 - 11/21/13 Date entered into ICIS/QNCR: 12/17/13
(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

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PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Clarksville NPDES #: AR0022187

Name, address and phone number of industry:
Hanesbrands Inc. 1904 Clark Rd. 479.979.3439

Type of industry: Hosiery Producer Date/Time of visit:
11/20/13 / 9:55 a.m.

Industry contacts: Eddie Shirley - Dye house Manager

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

*City operates & maintains their pretreatment aeration basins

Additional comments: Facility makes various types of hosiery. The manufacturing side of the plant doesn't generate any wastewater and is mostly robotic sewing of outside vendor yarns. Facility has not changed operations substantially since the last Audit in 11/10. Production therefore wastewater has increased however. Facility brings in different type yarns from vendors and strands them into

Visit conducted by: Gilliam/Smith/Rainey Date: 11/20/13

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Clarksville NPDES #: AR0022187

Industry name: Hanesbrands Inc.

Additional comments: fine fiber to form various type hosiery. This area is mainly made up of automated/robotic sewing machines where the intermediate products are sent from station to station via a maze of pneumatic tubes. No wastewater generated in this area. Very clean, no mist seen in this area.

After the white hosiery is formed, some are placed in bags to be dyed in round tubs for a pre-determined (and agitated) time until they're saturated. Some products have to be individually (not bagged together) dyed. The dyes' mixing room has no floor drains and any spills would be caught in a sump. It is in a totally enclosed clean room for proper dye color development. Dye development to meet customer demands is completed in this room with the "formula" (of a mixture of colors) is coded to blend the bigger batch of dye for the actual dyeing. The dye is pumped from numerous totes to their appropriate dye machine. They have 7 small dye machines for actual "Product Development". They're getting away from having to "dolly" any of the dyes to the (19) dyeing machines ("Production").

After the dyeing operation, the hosiery is "washed", rinsed and then sent to the drier room. For P2, the IU does capture heat from this process for pre-heating the wash/dye cycle and practices inventory control. There is some coarse screening in the floor troughs for catching "most" of the tags and hosiery from reaching the outside pretreatment "plant" (which the City operates and maintains). Wastewater (high BOD) from the wash/dyeing flows to the outside activated biological pretreatment system (4 concrete, in-ground air diffusion basins [-11' deep] with RAS and 2 new parallel clarifiers). Waste oil caught by the skimmers is pumped to on-site totes and removed off-site for disposal. Bacteria are now acclimated to biologically remove the oil and the totes do not have to be hauled off-site very often.

City Pretreatment personnel very familiar with IU's operations.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/20/13



[signature of auditor conducting visit]

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Clarksville NPDES #: AR0022187

Name, address and phone number of industry:

Bright Harvest, 509 Taylor Rd., 479.754.6313

Type of industry: Sweet Potato Processing Date/Time of visit:

11/20/13 / 12:35 p.m.

Industry contacts: Jeff Hannon-Mngr of QA/Compliance and Johnny Finn

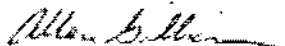
- Pretreatment Specialist

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

Additional comments: Facility has not changed substantially any processing since the last audit in 11/10. Only the outside pretreatment facility and sampling point were viewed.

IU brings in raw sweet potatoes and generates wastewater from its internal washing/peeling/blanching/frying and clean-up operations.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/20/13



(signature of auditor conducting visit)

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

Control Authority: City of Clarksville NPDES #: AR0022187

Industry name: Bright Harvest Foods

Additional comments:

Site visit consisted of "picking up" wastestream at rear of actual process building where bulk solids are removed by rotating screens. Wastewater comes from the processing of sweet potatoes, boiling and cleaning. End products include sweet potato casseroles, yam patties, fries, etc.

After bulk/waste solids removal (most to cattle farmers, some for land application sites thru TRS) wastewater is treated through a continuously rolling oil/grease belt skimming device. The sump the oil/grease is skimmed from has a 1,500 gallons capacity. The skimmed oil/grease is sent to their waste oil tank. The w.w. is then gravity fed to a small clarifier/settling basin then to a secondary clarifier, an aerated (2 aerators) pond, serpentine flows to a second two-cell aerated (2 aerators) lagoon. Flow and sampling is conducted in a 10" pipe within an enclosed sampling station ("hut").

City coordinator seemed very knowledgeable of this IU and indicated successful water conservation measures have taken place over the last few years at this facility although production as well as wastewater has increased in the recent past.

Partial clean-up is done daily with a full plant clean-up done once/week. Chemicals used for "Clean-in-place" (CIP) include foaming agents, ammonia, nitric and phosphoric acids. IU rep. indicated only about 4 gallons are mixed with city water to accomplish this.

Canola oil now stored in ~3000 gallon upright steel tanks with secondary containment. Their used oil is also stored outside in a ~1000 gallon steel tank with secondary containment. Heating oil unit is also outside and contained. All outside storage looked to be well maintained and clean. They have now added a concrete retaining wall to gravity divert any outside waste/spilled products or contaminated stormwater directly to the first clarifier/settling basin.

City reps. were familiar with the IU's operations. The IU reps. were very open and familiar with what was required of them.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/20/13



(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Clarksville NPDES #: AR0022187

Name, address, phone number of industry:

Greenville Tube, 501 S. Montgomery St, 479.754.6500

Type of Industry: CFR 433

Date/Time of visit:

Passivation of SS Steel Tube Products

11/20/13 / 1:20 p.m.

Industry contacts: George Holland - Maintenance Supv. and "Rick" -
"Maintenance"

	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	✓*	___	___

*Replaced Nitric with Citric Acid for passivation

Additional comments: Facility has not substantially changed operations since the last audit in 11/10. They bring in SS tube products. Stainless Steel (SS) seamless and welded tube "hollows" they're starting with at present are almost all is ASTM 312. They replaced their nitric acid with citric to achieve passivation of their SS tube products prior to the last audit.

Chemicals storage (coolants, oils, ammonia, de-greasing solvents- "bromothane S") are stored outdoors with secondary containment for most.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/20/13

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Clarksville NPDES #: AR0022187

Industry name: Greenville Tube

Additional comments: Tubes are further drawn to desired ID and OD using a "TD-200" (paraffin based) grease for lubrication. They're degreased with "bromothane S", rag wiped, then annealed at 2050 F in a hydrogen atmosphere (6 furnaces). Tubes are sent through a cooling system where the products are passed through larger diameter tubes immersed in water bath (therefore, non-contact cooling water which is discharged under their NPDES permit).

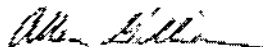
Coolant fluids are filtered for re-use. Products are cut to length, deburred, polished if necessary, logo-printed then sent to the passivation process. Cuttings/polishing wastes look like brownish-grey mud and are physically removed with the paper filters (~2'X~4'), thrown into trash and replaced. Passivation consists of immersion of lengths of tubing in a solution of citric acid which removes the free Fe from the Cr and accelerates the growth of Chromium oxide, which is the protective coating. Product is then rinsed in a combination of fresh city and artesian water.

Overflow from the rinse tank is the only discharge to the city on a continual basis (~1,500 gpd). They no longer conduct ultrasonic pressure test, but do hydrostatic testing which is circulated through the rinse tank.

No pretreatment necessary. Some soda ash is used for pH adjustment. Adequate sampling site and City pretreatment personnel seem very knowledgeable about this facility's processes and wastewater generating areas.

Employees are trained on chemical handling procedures. A slug discharge potential appears negligible to this auditor.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/20/13



signature of auditor conducting visit)

Attachment A-1



P.O. Box 1807 • Phone (479) 754-3148 • Clarksville, Arkansas 72830

May 31, 2013

Eddie Shirley
Environmental Manager
Hanesbrand Inc.
P.O. Box 669
Clarksville AR 72830

RE: Flow Exceedance

Dear Mr. Shirley

The flow at Hanesbrand was over the allowable limit of 150,000 gallons per day. The days and gallons are as follows, May 2, 2013 157,996; May 7, 2013 185,504; May 8, 2013 187,900. You have already sent a letter of corrective action so nothing more is needed at this time. Thank you for your time and cooperation on this matter.

Sincerely

A handwritten signature in black ink that reads "Pam Smith". The signature is written in a cursive style.

Pam Smith
Pretreatment Coordinator

CC: Cathy Staicup

COPY

(Attachment A-2)

City of Clarksville, Arkansas
Clarksville Light and Water Commission

Permit No. 02

INDUSTRIAL USER PERMIT

Cathrine Stalcup
Plant Manager
Hanesbrands Inc.
1904 West Clark Rd.
P.O. Box 669
Clarksville, AR 72830

SIC 2251

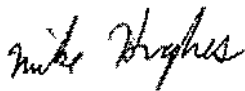
RE: Renewal of Industrial User Permit 02

Dear Mrs. Stalcup

Your application for discharge Permit has been reviewed and processed in accordance with Municipal code 10.04.14. The issued permit covers the wastewater discharge from the facility located at Cline and Clark Road into the City of Clarksville, and actions and reports relating there of shall be in accordance with the terms and conditions of this permit.

If you wish to appeal or challenge the effluent limitations, pretreatment requirements, or conditions imposed by this permit, a petition shall be filled for reissuance of this permit a minimum of 60 days prior to expiration date.

This permit shall take effect September 1 2011 and shall expire August 31 2016.



Mike Hughes
General Manager

P.S.

PREMIT REQUIRMENTS

Section A. Effluent Limitations and Monitoring Requirements Out Fall Number 001.

1. During the period beginning on effective date and lasting until the date of expiration, the permittee is authorized to discharge from outfall number 001. Such discharges shall be limited and monitored by the permittee as specified below. Monitoring samples will be taken from the heat recovery pit in the plant before entering the pipe to the headworks of the pretreatment plant, with the exception of oil and grease, which will be taken at the effluent of the pretreatment plant.

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	30-Day Avg <u>lbs/day</u>	<u>Units (mg/l)</u>	<u>Frequency</u>	<u>Sample Type</u>
Flow*			Daily	Meter
Carbonaceous Bio-Chemical				
Oxygen Demand (5 day)	3941	2700	2 / month	24 hr. comp.
Total Suspended Solids	762	522	2 / month	24 hr. comp.
pH Shall not be less than 6.0 nor greater than 10.0 Standard units			2 / month	Grab
Oil and Grease Maximum (1-day)		100	2 / month	Grab

Best Management Praetices

Temperature (Maximum) 150 F.

*Flow shall be monitored and reported.

*Flow limitations:

Average..... gallons / day

Maximum.....175,000 gallons / day

Local limits on oil and grease for industrial contributors is 100 mg/l, whether emulsified or not.

All laboratory results shall be reported monthly to:

Clarksville Light & Water Company
P.O. Box 1807
Clarksville, AR 72830
Attn: Gregg Rainey

The monthly sewer charge will be computed by the formula described in Municipal Code Chapter 10.04.18

SECTION B. GENERAL CONDITIONS AND DEFINITIONS

1. Severability

The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

2. Duty to Comply

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

3. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Permit Action

This permit may be modified, revoked and reissued, or terminated for good cause including, but not limited to, the following:

- A. To incorporate any new or revised Federal, State, or Local pretreatment standards or requirements;
- B. Material or substantial alterations or additions to the discharger's operations which were not covered in the effective permit;
- C. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge;

- D. Information indicating that the permitted discharge poses a threat to the City of Clarksville, Clarksville Light and Water's collection and treatment systems, POTW personnel or the receiving waters;
- E. Violation of any terms or conditions of this permit;
- F. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- G. Upon request of the permittee, provided such request does not create a violation of any existing applicable requirements, standards, laws, rules and regulation.

The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

5. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or Local laws or regulations.

6. Limitation on Permit Transfer

Industrial user permits are issued to a specific user for a specific operation and are not transferable nor assignable to another person or industry nor transferable to any other location without prior written approval of the City of Clarksville, Clarksville Light and Water Company in the event of sale, the permittee must inform the purchaser of all responsibilities and obligations under this permit.

7. Dilution

The permittee shall not increase the use of potable or process water or, in any way, attempt to dilute an effluent as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

8. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the public treatment resulting from noncompliance with any effluent limitation specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. The permittee shall immediately notify the City of Clarksville, Clarksville Light and Water of sludge discharges, spills that may enter in the public sewer, or any other significant changes in operations, wastewater characteristics and constituents.

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9. Approval of Facilities

The Clarksville Light and Water Company manager prior to construction shall approve plans and specifications for monitoring access facilities and for pretreatment facilities.

10. Definitions

- A. Bi-Weekly – Once every other week.
- B. Bi-Monthly – Once every other month.
- C. Bypass – Means the intentional diversion of wastes from any other portion of treatment facility.
- D. CFR – Code of Federal Regulations.
- E. Composite Sample – A combination of individual samples obtained at regular intervals over a specified time period. (Refer to permit.)
- F. Cooling Water –
 - 1. Uncontaminated: Water used for cooling purposes only which has no direct contact with any raw material, intermediate, or final product and which does not contain a level of contaminants detectable higher than that of the intake water.
 - 2. Contaminated: Water used for cooling purposes only which may become contaminated either through the use of water treatment chemicals used for corrosion inhibitors or biocides, or by direct contact with process materials and/or wastewater.
- G. Daily Maximum – The maximum allowable discharge of pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant derived from all measurements taken that day.
- H. Grab Sample – An individual sample collected in less than 15 minutes, without regard for flow or time.
- I. Instantaneous Maximum Concentration – The maximum concentration allowed in any single grab sample.
- J. Monthly Average – Other than fecal coliform bacteria, is the arithmetic mean of values for effluent samples collected over a period of 30 consecutive days the weekly average for fecal coliform bacteria is the geometric mean of the values for effluent samples collected over a period of seven consecutive days.

A-2e

K. Significant Industrial User -- Is a wastewater source that:

1. Is a categorical industry under the Federal regulations;
2. Discharges 25,000 gallons or more per average workday; or
3. Contributes a process waste stream greater than five percent of the flow carried by the municipal system receiving the waste; or
4. Has in its waste a toxic pollutant in toxic amounts; or
5. Has significant impact, either singly or in combination with other industries, on the treatment works or on the quality of its effluent.

L. Upset -- Means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee, excluding such factors as operational error, improperly designed or inadequate treatment facilities, or improper operation and maintenance or lack thereof.

M. Weekly Average -- Other than for fecal coliform bacteria, is the arithmetic mean of the values for effluent samples collected over a period of seven consecutive days. The weekly average for fecal coliform bacteria is the geometric mean of the values for effluent samples collected over a period of seven consecutive days.

11. General Prohibitive Standards

The Industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State Hazardous Waste Authorities in writing of any discharge into the POTW of a substance which, if otherwise disposed of, would be a hazardous waste under 40 CFR 261. The Industrial User shall maintain documentation of the disposal of, would be a hazardous waste under 40 CFR 261. The Industrial User shall maintain documentation of the disposal of sludge or other materials classified as 'Hazardous Waste' by a method and at a site approved by appropriate State and Federal Regulatory Agencies. The permittee shall comply with all the general prohibitive discharge standards in Municipal Code 10.04.06. Namely, the industrial user shall not discharge wastewater to the sewer system:

- A. Having a temperature higher than 150 °F;
- B. Containing more than 100 ppm by weight of fats, oils and grease;
- C. Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases;
- D. Containing any garbage that has not been ground by household type or other suitable garbage grinders;
- E. Containing any ashes, eiders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or any other solids or

A-2 f

- viscous substances capable of causing obstructions or other interferences with proper operation of the sewer system;
- F. Having a pH lower than 6.0 or higher than 9.0 or having any other corrosive property capable of causing damage or hazards to structures, equipment or personnel of the sewer system;
 - G. Containing toxic or poisonous substances in sufficient quantity to injure or interfere with any wastewater treatment process, to constitute hazards to humans or animals, or to create any hazard in waters, which receive, treated effluent from the sewer system treatment plant. Toxic wastes shall include, but are not limited to wastes containing cyanide, chromium, cadmium, mercury, copper, and nickel ions;
 - H. Containing noxious or malodorous gases or substances capable of creating a public nuisance;
 - I. Containing solids of such character and quantity that special and unusual attention is required for their handling.
 - J. Containing any substance which may affect the treatment plant's effluent and cause violation of the NPDES Permit requirements;
 - K. Containing any substance which would cause the treatment plant to be in noncompliance with sludge use, recycle or disposal criteria pursuant to guidelines or regulations developed under section 405 of the Federal Act, the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act or other regulations or criteria for sludge management and disposal as required by the State;
 - L. Excessive discoloration (such as, but not limited to, dye wastes and vegetable tanning solutions)
 - M. Containing any radioactive wastes or isotopes; or
 - N. Containing any pollutant, including BOD pollutants, released at a flow rate and/or pollutant concentration, which would cause interference with the treatment plant.

SECTION C.
OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

A-2g

1. Proper operation and maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: Effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

2. Duty to halt or reduce activity

Upon reduction, loss or failure of the treatment facility, the permittee shall to the extent necessary to maintain compliance with its permit, control production or all discharges or both until operation of the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example when the primary source of power of the treatment facility fails or is reduced. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of treatment

A. Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury or sever property damage or no feasible alternative exists.

B. Bypass not exceeding limitations

The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is essential maintenance to assure efficient operation.

C. Notification of bypass

Anticipated bypass: If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten days before the date of the bypass, to the Clarksville Light and Water Company to address specified in Section A, of this permit.

D. Unanticipated bypass

The permittee shall immediately notify the Clarksville Light and Water Company and submit a written notice to the POTW within

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24 hours of becoming aware of the bypass. A documented and verified operating upset shall be an affirmative defense to any enforcement action brought against the permittee for violations attributable to the upset event.

SECTION D.
MONITORING AND RECORDS

1. Periodic Reports on Continued Compliance
Any Industrial User subject to a categorical pretreatment standard shall submit to the Control Authority during the months of June and December, unless required more frequently by the Control Authority, a report indicating the nature and concentration of pollutants in the effluent, which are limited by such categorical pretreatment standards.
2. Representative Sampling
Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. Biochemical oxygen demand and total suspended solids shall be determined by 24-hour time composite samples. Oils and grease, pH and temperature shall be determined by grab samples. All samples for monitoring shall be taken on production days, which include all regular production, and/or cleanup shifts. All samples shall be taken at monitoring points before the effluent joins or is diluted by any other waste stream, body of water or substance. Once approved, monitoring points shall not be changed without notification to and the approval of the City of Clarksville, Clarksville Light and Water Company.
3. Flow Measurements
The appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes. This will be insured by annual calibration.
4. Analytical methods to Demonstrate Continued Compliance
Sampling and analysis of these samples shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto.

5. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using approved test procedures or as specified in this permit, the results of this monitoring shall be included in the permittee's self monitoring reports.

6. Inspection and Entry

The permittee shall allow the City of Clarksville Light and Water, or law to may require an authorized representative, upon the presentation of credentials and other documents as:

- A. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- C. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated;
- D. Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and
- E. Inspect any production, manufacturing, fabricating or storage area where pollutants, regulated under the permit, could originate.

7. Retention of Records

- A. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended by request of the City of Clarksville, Clarksville Light and Water Company at any time.
- B. All records that pertain to matters that are subject of special orders or any other enforcement or litigation activities brought by the City of Clarksville, Clarksville Light and Water Company shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

8. Record Contents

Records of sampling information shall include:

- A. The date, exact place, time and methods of sampling or measurements, and sample preservation techniques or procedures;

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- B. Who performed the sampling or measurements;
- C. The date (s) analyses were performed;
- D. Who performed the analyses;
- E. The analytical techniques or methods used; and
- F. The results of such analyses.

9. Falsifying Information

Any person who knowingly makes any false statements, representation or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to Municipal Code 10.04 or this permit, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under Municipal Code 10.04 shall, upon conviction, be punished by a fine of not more than One-Thousand Dollars (\$1000.00) or by imprisonment for not more than six (6) months or both.

SECTION E. ADDITIONAL REPORTING REQUIREMENTS

1. Planned Changes

The permittee shall give notice to the City of Clarksville, Clarksville Light and Water 90 days prior to any facility expansion, production increase, or process modifications, which results in new or substantially increased discharges or a change in the nature of the discharge.

2. Anticipated Noncompliance

The permittee shall give advance notice to the City of Clarksville, Clarksville Light and Water of any planned changes in the permittee facility of activity, which may result in noncompliance with permit requirements.

3. Duty to Provide Information

The permittee shall furnish to the City of Clarksville, Clarksville Light and Water, within reasonable time, any information which the City of Clarksville, Clarksville Light and Water may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the City of Clarksville, Clarksville Light and Water Company upon request, copies of records required to be kept by this permit.

4. Signatory Requirements

All applications, reports or information submitted to the City of Clarksville, Clarksville Light and Water Company shall be signed and certified.

SECTION F. PERMIT VIOLATIONS

1. Annual Publication
The City of Clarksville, Clarksville Light and Water shall annually publish a list of all industries, which were in significant violations of permit during the twelve (12) previous months, in the largest newspaper within its service area.
2. Civil and Criminal Liability
Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under Municipal Code 10.04.
3. Penalties for Violation of Permit Conditions
The Municipal code 10.04.15 2(a) provides that any person who violates a permit condition is subject to a civil penalty of not more than One Thousand Dollars (\$1,000.00) for each offense. Each day on which a violation shall occur or continue shall be considered as a separate offense.
4. Recovery of Costs Incurred
In addition to civil penalties, the City may recover from the user in violation any damages suffered, reasonable attorney's fees, court reporter's fees and other expenses of litigation in any action in law or equity against any person or other entity.
5. Operating Upsets
Any permittee that experiences an upset in operations that places the permittee in temporary state of noncompliance with the provisions of this permit shall inform the Clarksville Light and Water Company immediately upon the first awareness of the commencement of the upsets.

Where such information is given orally, within 24 hours a written follow-up report thereof shall be filed by the permittee with the Clarksville Light and Water Company within 5 days. The Industrial User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within 30 days after becoming aware of the violation. The report shall specify:

- A. Description of the upset or slug load, the cause(s) thereof and the upsets or slug loads impact on the permittee's compliance status;
- B. Duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance continues, the time by which compliance is reasonably expected to occur; and
- C. All steps taken or to be taken to reduce, eliminate and prevent recurring of such an upset, slug load or other conditions of noncompliance.

A document and verified operating upset shall be an affirmative defense to any enforcement action brought against the permittee for violations attributable to the upset event.

A-2m

In lieu of the requirement for monitoring of TTO, the Industrial User may certify that not toxic organic compounds are stored used or generated by the industry or that toxic organic compounds are controlled by the continued implementation of a solvents management plan approved by the Control Authority. The certification statement shall be submitted each time compliance monitoring is performed.

TOTAL TOXIC ORGANICS CERTIFICATIONS STATEMENT

Based on my inquiry of the person or persons directly responsible for managing compliance with permit limitation (or pretreatment standard) for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since the last scheduled compliance monitoring for TTO by Clarksville Light and Water Company.

I further certify that this facility is implementing the toxic organic management plant submitted to Clarksville Light and Water Company.

(Pres., Sec., Treas., V. Pres.)

Date of Signature

CORPORATE ACKNOWLEDGMENT

STATE OF ARKANSAS)
COUNTY OF _____)

Before me, the undersigned authority, on this day personally appeared _____
Of _____, 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 consideration therein expressed, in the capacity therein stated and
as the act and deed of said corporation.

Given under my hand and seal of office on this _____ day of _____, 20__.

Notary Public in and
For _____ County, Arkansas.

My commission Expires _____

A-2v

Attachment A-3



P.O. Box 1807 • Phone (479) 754-3148 • Clarksville, Arkansas 72830

April 20, 2011

RE: Permit Renewal

Dear Mr. Shirley

Hanesbrand wastewater discharge permit expires in August 2011. Please fill out the application for permit and return it within 60 days. If you have any questions please feel free to call me and I will do all I can to help. If you want a copy of the last one that you filled out just let me know and I will get it to you.

Thank You

A handwritten signature in cursive script that reads "Pam Smith".

Pam Smith

Pretreatment Coordinator

APPLICATION FOR PERMIT
FOR DISCHARGE OF INDUSTRIAL WASTE TO
CLARKSVILLE SEWAGE WORKS

1. FIRM NAME: Hanesbrands Inc Date: 4-27-11
 ADDRESS 1904 Clark Rd, Clarksville, AR 72830
P.O. 669
 PHONE: 479-979-3439

2. North American Industrial Classification Code Number (s) 31511, 313112
 SIC # 2251
 3. List other environmental control permits held at this time: Air Permit (minor)

4. Quantity of Wastewater:

Discharged to <u>Clarksville Sewer</u>	Average Daily (30 Day Avg.)	Maximum Daily (1 Day)
a. Process Wastewater from <u>Dye</u> Operation	<u>100,000</u>	<u>150,000</u>
b. Domestic Wastewater from Sanitary Sewer	<u>7,500</u>	<u>12,500</u>
c. Non-contact Cooling Water	<u>9,000</u>	<u>44,000</u>
d. Total Wastewater Discharged to Public Sewage Works	<u>116,500</u>	<u>206,500</u>

List Periodic or Seasonal Variation: NA

5. Wastewater Pollutant Parameters and Concentration:
 a. Conventional Pollutants – In the spaces below, indicate the measured (or projected for new industry) average and maximum value of each of the listed wastewater pollutants.

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REC 5-31-11

<u>Parameter</u>	Concentration	
	<u>Average Daily</u> <u>(30 Day)</u>	<u>Maximum Daily</u> <u>(1 Day)</u>
Biochemical Oxygen Demand (5 Day), mg/l(1)	_____	<u>2700</u>
Total Suspended Solids, mg/l (1)	_____	<u>522</u>
pH -- pH Units (6 - 9)	<u>6.0</u>	<u>9.0</u>
Oil & Grease, mg/l (2)	_____	<u>100</u>
Temperature, (150 degrees F Maximum)	_____	<u>150</u>
Copper	_____	<u>-</u>
Lead	_____	<u>-</u>
Silver	_____	<u>-</u>
Zinc	_____	<u>-</u>

(1). Maximum average may be 300 mg/l without paying surcharge. Clarksville City Ordinance No. 02-442 Section 10.04.18.

(2). Maximum 100 mg/l for one day.

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 this 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 analysis, and the person performing the analysis, 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 processes.

A-3c

Priority Pollutant Number	Parameter	Concentration - mg/l	
		Average Daily (30 Day)	Maximum Daily (1 Day)

6. Attach sketch(es) of general plant process and waste line layouts, including location of floor drains. Include any existing or proposed pretreatment system and locations, size and elevation of all existing and proposed connections to the Clarksville sewer system. Also include details of proposed monitoring facilities.

A-3d

7. a. Brief description of the nature of the manufacturing process or commercial activities at the plant.

Women's Sheer Hosiery

b. General description of products produced by type, amount and rate of production.

Sheer Hosiery
Yearly - 16,900,000
Weekly - 325,000
Daily - 65,000

c. General description of type and amount of raw material processed. Average and maximum per day.

Yarns - Avg 20,000 lbs
Max 25,000 lbs

Dye & finishes - Avg 200 lbs
max 220 lbs

Yarn oil - Avg 800 lbs
Max - 906 lbs

d. Number of employees 441 Work hours per day 24 days per week 5

8. Hours of operation of plant and actual or proposed hours of operation of pretreatment system. Time and duration of discharges.

daily 24 hrs
week 5 day
Yearly - 50 weeks

9. Is your manufacturing or commercial operations subject to National Categorical Pretreatment Standards established under 40 CFR 403.5?

Yes No

A-3e

Applicable National Categorical Standards: 40 Cer 410.24

10. Are the applicable National Categorical Pretreatment Standards and the Clarksville local discharge limitations being met on a consistent basis?

Yes No

Remarks: The categorial limits default to the city limits

11. 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?

Yes No

Remarks: _____

12. If additional pretreatment and/or O & M are required to meet the 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 the 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 completion of each event, the Industrial User shall submit a progress report to the General Manager 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.
 4. Steps taken by the Industrial User to return to the established schedule.

A-3F

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 Clarksville Municipal Code regulating the use of public sewage works.

Signature of Applicant Cathrine Stalcup Date 5/6/11

Name of Signee Cathrine Stalcup Title of Signee Plant Mgr.
(Please Print) (Please Print)

Name and phone number of contact regarding permit information: _____
Tommy Thompson 336-519-2715

CORPORATE ACKNOWLEDGMENT

STATE OF ARKANSAS

COUNTY OF Johnson

Before me, the undersigned authority, on this day personally appeared _____

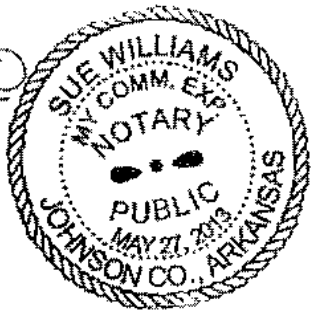
Cathrine Stalcup of Clarksville, AR

A corporation, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he/she executed the same for purposes and consideration therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this 6th day of May, 20 11

Sue Williams
Notary Public in and for Johnson
County, Arkansas

My commission expires May 27, 2013.



A-3g

Attachment A-4

**TOXIC ORGANIC
MANAGEMENT PLAN**

for

**GREENVILLE TUBE COMPANY
CLARKSVILLE, ARKANSAS**

July, 1998
Revised February, 2009

Prepared By:

OSWALD ENGINEERING, INC.

Revised By:

EEG, Inc.

*Rec.
11-18-09
D.S.*

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I. Description of Facilities and Solvent Use

A. Process Description

Greenville Tube Company (GTC) makes a variety of small diameter, stainless steel tubing products from "seamless hollows" and "welded hollows" and stainless steel strip (i.e., unfinished large-diameter tubes) at the Clarksville facility. These materials are used in a wide range of industrial applications, machinery, and equipment.

To begin production, the raw materials are cut to the desired length at a saw station. Particulate (i.e., metal dust) is generated during the cutting activities. The hollows are then drawn and trimmed to create the preliminary tubing products. The saw station for the initial cutting operation is equipped with a vent hood for the control of dust emissions.

The "seamless hollows" and "welded hollows" tubing are drawn into specified diameters. To prepare for drawing, one of five die rotary swager machines is used to form a point on one end of the tubing and a mandrel is manually installed into the tubing on the opposite end. The mandrel controls the wall thickness and inside diameter during the drawing process. The pointed end of the tubing is passed through a die on the draw bench and coupled to the drawing carriage. The carriage pulls the tubing through the die which decreases the outside and inside diameter of the tubing and increases its length. Simultaneously, the tubing is lubricated with drawing lubricants to facilitate its movement through the drawing die. The drawing mandrel is removed using one of five derodders and the swaged end is removed at one of two saw stations. The lubricated, coated drawn tube is transferred to the cleaning operation.

Coils of stainless steel strip are used to manufacture "as-welded" tubing products in a continuous manufacturing process. The strip is formed into a tube shape on a mill. The edges are then welded together to form a tube. The welded tube travels to an annealing oven with a Hydrogen atmosphere. The annealed tubes are quenched in an air atmosphere. On the #6 As Weld Mill the tube travels through the "conditioner", a series of ball bearings, to work the OD of the tube and eliminate the appearance of a weld line on the outside of the tube. The conditioning process introduces some lubricants to the outside of the tube which are removed by a wash with water and biodegradable detergent. The finished long lengths of tubing are then coiled or cut to length according to customer specifications.

Vapor Degreaser System – The vapor degreaser system does not use a halogenated solvent as defined by §63.461. The vapor degreaser system consists of a large degreasing chamber, two vapor supply tanks, two solvent soak tanks, a solvent distillation unit and a variety of ancillary equipment, chilled water system, vacuum pumps, heater exchanges, etc. The system also includes a natural gas-fired process heater and an 8,000 gallon solvent storage tank. A non-halogenated solvent, n-propyl bromide, is used as the cleaning agent. A solvent stabilizer is also processed. The stabilizer is stored in and dispensed from a drum.

The former Vapor Degreaser System – Soils generated from drawing activities were previously removed by a solvent cleaning machine (degreaser). A bundle of tubing was placed in a Baron Blakeslee Single Dip Degreaser containing trichloroethylene (TCE), also known as Trichloroethene. The old degreasing system including: the degreaser with distillation unit, a refrigeration compressor, a boiler, and a 9,000 gallon aboveground solvent storage tank. TCE has been removed from the facility after installation of the new solvent cleaning system.

A 4c

The annealing process consists of heating and cooling the metal under precise controls to remove internal stresses; thus, producing a more ductile and less brittle material. Six annealing furnaces are fired using natural gas. GTC also operates an electric annealing furnace, an insignificant activity. It is used to heat-treat "as-welded" tubing. The oven chamber is blanketed with hydrogen gas.

In route to the passivator, the tubing is straightened, cut, deburred, and cleaned by pneumatic blasting with an abrasive compound.

Polishing and passivation processes are performed to minimize oxidation and discoloration of the outer and inner tubing surfaces. If required, the tubing is polished using an electric buffer unit. Water soluble metalworking fluids are used as lubricants. During passivation, the tubing is placed in a citric acid bath, rinsed in a water bath, and dried in a natural gas fired oven.

The main manufacturing area is long (1,000 feet) and narrow (80 feet). Offices, maintenance, machine shop, and boiler, compressor, and still rooms are attached to the east and west walls of the manufacturing area. The degreaser, which is located in the southeast corner of the building, sets in a vault that is 114.5 feet long by 10.2 feet wide. The floor of the vault is 8 feet below the day-floor of the building. This system is currently not in operation.

Water is used at the manufacturing facility for the following purposes: Sanitary, cooling, boiler makeup, passivator citric acid solution and passivator rinse.

All water supplied for sanitary use is supplied by the City of Clarksville. Two restrooms are located in the office area of the facility and one each at southeast end and northeast side of the manufacturing area. Sanitary wastewaters from these restrooms individually flow to the west side of the facility and discharge directly into the Clarksville sanitary sewer collection system.

City water is also provided to the boiler room located on the southeast side of the manufacturing area adjacent and north of the south restroom. The water is used for boiler makeup water. Boiler blow-down discharges into a floor drain which ties into the south restroom sanitary drain which discharges directly into the Clarksville sanitary sewer collection system.

In addition to the above uses of potable water supplied by the City of Clarksville, an emergency crossover connection to the process water supply has been installed. The connection is located along the west interior wall of the manufacturing area just east of the office south restroom. The connection is equipped with a backflow preventer and shut-off valve to protect the potable water supply.

Process cooling water is supplied via a closed looped system. Cooling water is pumped continuously through the closed loop system from the cooling tower discharge sump, through the system and back to the head of the cooling tower. City water is added to the system on an as needed basis to replace water lost due to cooling tower evaporation.

Process water for the passivator citric acid solution makeup and passivator rinse is obtained primarily from a ground water sump located at the south end of the vault beneath the degreaser. Groundwater beneath the property contains TCE and related degradation compounds. An air stripper has been installed as a ground water treatment system to reduce those compounds to an acceptable level prior to use as passivator rinse water. During periods of dry weather the ground water sump does not provide the necessary process water volume for the citric acid solution makeup and passivator rinse waters.

A-4d

During these dry periods city water is used as needed to augment the process supply. The rinse water tank overflow is currently discharged as wastewater to the Clarksville wastewater treatment facility. It is estimated that approximately 1,000 to 15,000 gallons of rinse water are discharged daily. Spent citric acid solution is neutralized and transported to an off-site treatment facility for metals recovery.

Attached is a layout drawing of the facility indicating the approximate location of significant water and wastewater lines.

B. Identification of Toxic Organic Chemicals Entering the Plant Wastewaters

1. Analysis of Treated Wastewaters

Original samples were taken of the rinse water overflow discharge and analyzed for the 126 toxic organics regulated under the metal finishing categorical pretreatment standards. Samples collected were 24 hour flow proportioned composite samples for acid extractable and base/neutral compounds, as well as volatile organics. Samples were taken over a period when all production lines were operating at normal production rates. Samples were analyzed by gas chromatography with compound identification and quantification by mass spectrophotometer (GC/MS). EPA procedures 624, 625 and 608 were followed for GC/MS analysis. Only one toxic organic compound was detected at concentrations greater than 0.01 mg/l and is listed in Table 1.

Table 1

<u>Compound</u>	<u>Concentration</u>
Trichloroethene	0.0149mg/l (06/04-05/98)
Trichloroethene	0.0078mg/l (10/9/08)

A sample was collected on October 9, 2008, 24-hour time weighted composite for TCE results were 0.0078 mg/l. In addition to the above analysis the composite sample was analyzed for 40 CFR PART 433 metals. Grab samples were analyzed for O&G, TSS and Cyanide.

The recent laboratory analysis is enclosed in Attachment I.

2. Identification of Solvents Used in Manufacturing Operations

- a. N-Propyl Bromide (NPB) – non-halogenated solvent contains bromides.
- b. Calumet 142 F Naphtha R66 - contains petroleum naphtha solvent.
- c. American Enterprise Industries 289-S – contains ethers.

It is possible that any or all of the above compounds contain priority pollutants.

Material Safety Data Sheets for all of the above solvents are enclosed in Attachment II.

A-4e

3. Identification of Other Potential Sources of Toxic Organic Pollutant Introduction to the Wastewater Treatment System

- a. Inkjet T26R Ink - contains butyl benzyl phthalate and methyl ethyl ketone.
- b. Inkjet 265-25 Makeup Fluid - contains methyl ethyl ketone.
- c. Klean Strip Acetone - contains acetone.
- d. Acetone Reagent ACS - contains acetone.
- e. Lacquer Thinner - contains xylene or toluene.
- f. Paint Thinner - contains xylene or toluene.

It is possible that any or all of the above compounds contain priority pollutants.

A-4f

II. Description of Control Options Explored

A. Solvent Substitution

GTC has replaced TCE with NPB, which does not contain any toxic organic materials listed as a toxic organic Regulated Pollutant in 40 CFR PART 433 - Metal Finishing.

B. Process Modifications

Solvents are not used in processes which contribute directly to the manufacturing facility's wastewater discharge. The trace amount of the toxic organic found to be present in the treated wastewater is believed to be contributed by residual amounts of TCE remaining in the ground water after the ground water air stripping treatment system. There does not seem to be any practical alternative process modifications which would result in a potential reduction of solvents being discharged in the process wastewater.

C. Segregated Drain System

The manufacturing area is constructed with a segregated drain system allowing all sanitary wastewater to be directly discharged to the Clarksville collection system. All process cooling water is returned to the cooling tower via a separate collection system for reuse in the closed loop system. The potential of spills of toxic organics to the sanitary and rinse process wastewater stream is greatly reduced due to the segregated floor drain system.

D. Sealing Floor Drains

The possible introduction of toxic organics to wastewaters through floor drains could be greatly reduced if all floor drains were sealed. In some of the process areas this option is not feasible because large volumes of water are used as part of the process. Floor drains and cleanouts should be sealed in all areas where they are not required. Very few floor drains in the manufacturing areas have positive floor drainage to their locations, thus reducing the possibility of a spill of toxic organics reaching the wastewater stream.

The floor drain in the Boiler Room accepts boiler blowdown, and drains directly to the City sewer. The trichloroethylene still (Currently not in use) is also located in the Boiler Room. A curb is placed entirely around the drain to prevent any material which may drip or leak from the still from entering the drain.

E. Installing Sumps in the Floor Drains

The degreaser is located in a vault capable of containing any major spill from the unit. If a spill occurred the vault would contain the spill that could be removed and recovered.

F. Spill Clean-up Equipment and Material Storage Stations

As part of this Toxic Organic Management Plan the plant manager shall issued a memorandum to all employees that reads as follows:

"Subject: Accidental Discharge to Sewer

Under no circumstances should any solvents or other liquids other than ongoing process water, be allowed to discharge into a drain fixture that will enter into the sewer system.

A-4g

Should an accidental spill of any questionable liquid occur, every attempt should be made to contain the liquid by use of floor dry, mops or other means and the residue should be transferred to 55 gallon drums.

In case of an accidental spill that discharges into the sewer system, the employee(s) should contact their foreman as to quantity and type of spill involved. This information will be forwarded to either of the following:

*Amber Parham
Clint Blunier*

This requirement is mandatory under the Federal Clean Water Act of 1977."

Oil dry, a clay based absorbent, is distributed throughout the manufacturing area to provide spill containment and removal. The spent absorbent is broomed and shoveled into a 55 gallon drum for storage and proper disposal.

A-4h

III. Toxic Organic Management Plan

As a result of the above analysis, GTC believes that all of its toxic organic pollutant discharges can be controlled by a solvent and toxic organic compound management plan in lieu of routine organics monitoring.

A. Solvent Substitution

GTC has discontinued the use of TCE. The current chemical, a non-halogenated solvent, n-propyl bromide, is used as the cleaning agent. A solvent stabilizer is also processed. The stabilizer is stored in and dispensed from a drum located inside a secondary containment.

These chemicals do not contain toxic organic materials. At the present time, GTC believes the TCE solvents should be kept as a potential solvent used in the process in the event of a failure of the current non-halogenated solvent

B. Process Changes

Solvents are not used in processes which contribute to the manufacturing facility's wastewater discharge. There does not seem to be any alternative process modifications which would result in a reduction of solvents or toxic organic compounds being discharged in the process wastewater.

C. Solvent Storage Procedures

All solvents are stored in curbed bulk storage areas inside the plant and under roof on the exterior of the manufacturing building. Solvents are unloaded directly from commercial carriers to the bulk storage vessels. No active floor drains are located near these areas. All storage areas are curbed and contain no floor drains.

D. Sealing Floor Drains

Floor drains and cleanouts are sealed in all areas where they are not required. In the Boiler Room, a curb has been placed entirely around the drain to prevent any material which may drip or leak from the trichloroethylene still from entering the floor drain.

E. Sumps in Process Areas

The degreaser is located in a vault capable of containing any major spill from the unit. If a spill occurs, the existing sump pump is to be turned off and the spilled material removed and recovered.

F. Spill Clean-up Equipment and Material Storage Stations

The plant is currently equipped throughout the manufacturing area with clay based absorbent to aid in the containment and removal of any toxic organic spill. All employees have been notified by memorandum as to current procedures to be implemented should a spill occur (refer to Section II.F. above).

G. Spent Solvent Disposal Practices

Spent solvents and still bottoms are collected in 55 gallon drums, sealed, and stored in a curbed storage area. The storage area has no floor drains. Spent solvents and still bottoms are shipped to a licensed regulated and/or hazardous waste disposer for reclamation and/or reuse.

All shop clothes used in association with solvents are collected in 55 gallon drums and commercially laundered for reuse.

A-4i

H. Training

All personnel involved in using, handling, and clean-up activities will receive instruction in the proper handling and disposal of solvents, toxic organic compounds and clean-up materials in order to keep regulated toxic organics out of industrial wastewater. New employees will be trained in these procedures immediately. All personnel working in these activities are familiar with this toxic organic management plan and will follow the procedure established in that standard to eliminate regulated organics from entering the water wash system.

Training consists of classroom instruction which reviews the following:

1. The solvents and toxic organic compounds known to be in use at the plant and the areas in which they are transported, stored, and used.
2. The location of active floor drains and the location and understanding of the pretreatment wastewater system for the plant.
3. The Toxic Organic Management Plan and the proper procedures for handling and disposing of solvents and paint compounds.

I. Inspections

1. Transportation, storage, and use areas will be inspected routinely by the area supervisor to verify cleaning procedures and adherence to this Toxic Organic Management Plan to insure that toxic organics do not spill or leak into plant sewers.
2. Solvent handling, rinse, and collection areas, as well as raw material and waste solvent storage areas, will be inspected weekly by a designated environmental representative to verify proper solvent storage, handling, and collection. A log of inspections and sign-off will be maintained by the designated environmental representative.

J. Implementation

All provisions of this revised plan will be fully implemented by September 30, 2009.

A-4j

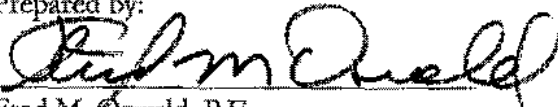
IV. Certification

"Based on my inquiry of the person or persons directly responsible for managing compliance with the TTO limitations, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last report. I further certify that this facility is implementing this toxic organic pollutant management plan submitted to the Control Authority on 11/18, 2009."



Clint Blunier
Plant Manager
Greenville Tube Company
Telephone: (479) 754-6500

Prepared by:



Fred M. Oswald, P.E.
State of Arkansas
Registered Professional
Engineer No. 4568



A-4K

Attachment A-5

FACT SHEET

Date 10-16-13

Industry Hanesbrand Inc

Permit # DZ

Address P.O. Box 169

Clarksville AR.

72830

SIC 2251

Contacts Name	Phone #	Title
<u>Eddie Shirley</u>	<u>479-979-3419</u>	<u>Safety & Environmental manager</u>

<u>Eddie Shirley</u>	<u>479-970-8195</u>	
----------------------	---------------------	--

Emergency Contacts	Name	Phone #	Title
	<u>Maintenance</u>	<u>979-5656</u>	

Category Non-Categorical

Max Flow 175,000 gpd

Discharge Point From dye House to pit to pretreatment plant

Type of Flow Meter mechanical

Dilution Streams no dilution streams

Best Management

Practices Do not mix waste; no mixing of hazardous waste
Maintenance personal are trained to clean up
spills.

Sampling Parameters

C-BOD-S, TSS, oil & grease, pH, Temp

Sample Location Heat recovery pit and effluent for
oil & grease

Sampling Frequency 2 Times per month

Description of Industry Actives from dye house water goes through
4 sets of screens then to pretreatment plant

Description of Stored Chemicals Dyes, cleaners, finishes,
some oils

Any Pretreatment Actives screens

Slug or TOMP dye house drains are all tied into
pretreatment plant.

Description of Process Actives Total manufacturing of womens
Panty hose seamless bra's

Other Information _____

Signatures _____

Attachment A-b

1904 Clark Rd.
PO Box 669
Clarksville, AR 72830
USA
+1 479 979 3400 tel

October 30, 2013

HANES*brands*INC

RETURN RECEIPT REQUESTED

Clarksville Light and Water Company
P.O. Box 1807
Clarksville, AR 72830

ATTN: Mr. Greg Rainey

RE: Hanes Brands Inc
Clarksville Plant – Monthly Report
Permit No. 02

Dear Mr. Rainey:

Attached is a copy of the required monthly Industrial Wastewater Discharge Self-Monitoring report for October, 2013.

The report is submitted in accordance with referenced permit.

Please advise of questions.

Very truly yours,
Hanesbrands, Inc

Cathy Stalcup
Cathy Stalcup
Plant Manager

Cc: Eddie Shirley
Tommy Thompsen
Clarksville POTW Self-Monitoring Report File

Hbi

*Rec
11-5-13
AS*

To: *Clarksville Light and Water Company*
P. O. Box 1807
Clarksville, AR 72830
Attn: Greg Rainey

CITY OF CLARKSVILLE, ARKANSAS
MONTHLY INDUSTRIAL WASTEWATER DISCHARGE SELF-MONITORING REPORT


1. Company Name: Hanes Brands Inc
- Address: Cline & Clark Rd, Clarksville, Arkansas 72830
- Pretreatment Plant Contact: Eddie Shirley
- Plant Manager: Cathy Stalcup
2. Reporting Interval: 13/10/01 TO 13/10/31
YR/MO/DAY YR/MO/DAY
3. Discharge Parameters

Parameter	Permitted Conditions		Reported From Sampling	
	Monthly Average		Monthly Average	
CBOD ₅ (Lbs./Mg/l)	3941	2700	663	525
TSS (Lbs./Mg/l)	762	522	106	84
O/G Max. (1-Day)	N/A	100 Mg/l	N/A	17 max
Temp (Max. F)	N/A	150	N/A	122max
pH (Max)	N/A	6.0 - 10.0	N/A	7.3-6.7
Flow (MGD Avg/Max)	Report	.175	0.152	.152

4. Sample Type: (a) Automatic Composite BOD and TSS
 (b) Grab for O/G, Temperature and pH
5. Compliance: Yes No
6. Sample Dates 10/3/13 and 10/16/13
7. Comments _____

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

10/30/13
 Date
 Prepared: 10/30/13


 Cathy Stalcup, Plant Manager
 A-66

EEG

Environmental Enterprise Group, Inc.
PROVIDING CUSTOMIZED SERVICES NATIONWIDE

L359-07595

171250

Company Name: Hanesbrands, Inc.			Phone #: (479) 754-8803			Requested Analysis												pH: 6.7 @ UCS Temp: 60.1 By: MAX Heat Recovery Pit Remarks (Please note special detection limits below.)	
Address: PO Box 669, Clarksville, AR 72830			Fax #:			CBOD, TSS Oil & Grease													
Project Name or Number:			Purchase Order #:																
Sampling Personnel Signature(s): <i>Adam Parkhurst</i>						Printed: ADAM PARKHURST												Laboratory Use Only	FLOW (24 Hour)
Sample I.D.	Date	Time	Comp.	Grab	Cont. Type Plast. Glass	# of Containers	Method Preserved H2SO4 HNO3 NaOH HCL Ice None Water Soil Air Sludge Other						Sample Matrix	Control Number					
Heat Recov. Pit	Start: 10-2-13 Stop: 10-3-13	8:00	X		X	1												X	1013025
Heat Recov. Pit	10-3-13	1105		X		0												X	1013026
Treat Plant	10-3-13	8:30			X	1	X											X	1013027
												152,000							
Relinquished by Client: <i>Adam Parkhurst</i>				Date:	10-3-13	Time:	8:00	Received by Lab: <i>Stacygren</i>				Date:	10-3-13	Time:	15:15				
Received by Lab: <i>Meagan Hatcher</i>				Date:	10-3-13	Time:	1105	Relinquished by Lab: <i>Stacygren</i>				Date:	10-4-13	Time:	1100				
Relinquished by Lab: <i>Meagan Hatcher</i>				Date:	10-3-13	Time:	15:15	Received by Lab: <i>Luigi Hopton</i>				Date:	10-4-13	Time:	1245				
Comments: Sampler is set up by Hanesbrands personnel. Samples are collected by EEG personnel. Risk 4.80c																			

ABC 2

✓



**E n v i r o n m e n t a l
E n t e r p r i s e G r o u p , I n c .**

220 North Knoxville Russellville, Arkansas 72801
Phone (479) 968-6767 Fax (479) 968-1956
www.eegonline.com

October 9, 2013
Control No. 171250
Page 3 of 4

Hanesbrand Inc.
Post Office Box 669
Clarksville, AR 72830

ANALYTICAL RESULTS

AIC No. 171250-1

Sample Identification: L359-047595 1013025 Heat Recov. Pit 10-2-13 8:00 10-3-13 8:00

Analyte	Result	RL	Units	Qualifier
Carbonaceous BOD 5-day SM 5210 B	510	100	mg/l	
Prep: 04-Oct-2013 1602 by 285	Analyzed: 09-Oct-2013 1027 by 285		Batch: W45153	
Total Suspended Solids USGS 3765	110	10	mg/l	
Prep: 08-Oct-2013 0942 by 285	Analyzed: 08-Oct-2013 1549 by 285		Batch: W45184	

AIC No. 171250-2

Sample Identification: L359-047595 1013027 Treat Plant 10-3-13 8:30

Analyte	Result	RL	Units	Qualifier
Oil and Grease EPA 1664A	< 5	5	mg/l	
Prep: 07-Oct-2013 0814 by 295	Analyzed: 07-Oct-2013 1648 by 295		Batch: B8567	

Client: Hanesbrands, Inc.
 Date of Sample: 10/3/13
 Time of Sample: 1105
 Date Received: 10/3/13
 Sample Collected From: Heat Rec. Pit
 Sample Collected By: Megan Hatcher
 Sample Matrix: Wastewater

Job Number: L359-047595
 Date of Report: 10/11/13
 P.O. Number: Not Given
 Control Number: 1013026
 Sample I.D.: Heat Rec. Pit
 Sample Delivered By: M. Hatcher

ANALYSIS REPORT

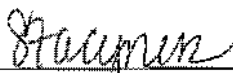
Parameter	Init.	Date	Time	Concentration	Units	Method
pH	MH	10/3/13	1105	6.7		4500H+ *

QUALITY CONTROL

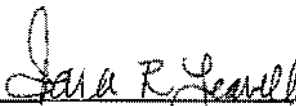
Parameter	Orig. Value	Dup. Value	Rel. % Difference
pH	6.76	6.77	0.15

All instruments have been calibrated on a daily basis. Each day, Quality Control procedures have been performed on 10% of all analysis.

**Approved by Standard Methods Committee, 1990.*



 Reviewed By



 Reviewed By



Environmental Enterprise Group, Inc.
PROVIDING CUSTOMIZED SERVICES NATIONWIDE

L359-047652

171715

Company Name: Hanesbrands, Inc.			Phone #: (479) 754-8883			Requested Analysis										pH: 7.3 @ 0940 Temp: 46.8					
Address: PO Box 669, Clarksville, AR 72830			Fax #:			CBOD, TSS PH Oil & Grease										By: MH Heat Recovery Pfl					
Project Name or Number:			Purchase Order #:													Remarks (Please note special detection limits below.)					
Sampling Personnel Signature(s): <i>Caron Yarborough</i>					Printed: CARON YARBOROUGH															Laboratory Use Only	
Sample I.D.	Date	Time	Comp.	Grab	Cool. Type		# of Containers	Method Preserved										Sample Matrix	Control Number	FLOW (24 Hour)	
					Plast.	Glass		H2SO4	HNO3	NaOH	HCL	Ice	None	Water	Soil	Air	Sludge				Other
Heat Recov. Pfl	Start: 10-16-13	8:00	X	X			1											X	1013143	A	
	Stop: 10-17-13	8:00																			
Heat Recov. Pfl	10-17-13	0940		X			0											X	1013144		
Treat Plant	10-17-13	8:30			X		1	X								X	1013145				
																			151,000		
Relinquished by Client: <i>Caron Yarborough</i>			Date: 10-17-13			Time: 8:00			Received by Lab: <i>Staugren</i>			Date: 10-17-13			Time: 1205						
Received by Lab: <i>Megan Hatcher</i>			Date: 10-17-13			Time: 0940			Relinquished by Lab: <i>Staugren</i>			Date: 10-18-13			Time: 1100						
Relinquished by Lab: <i>Megan Hatcher</i>			Date: 10-17-13			Time: 1205			Received by Lab: <i>Megan Hatcher</i>			Date: 10-18-13			Time: 1230						
Comments: Sampler is set up by Hanesbrands personnel. Samples are collected by EEG personnel. Rush 6.6°C																					

A-6 f ②



**E n v i r o n m e n t a l
E n t e r p r i s e G r o u p , I n c .**

220 North Knoxville Russellville, Arkansas 72801
Phone (479) 968-6767 Fax (479) 968-1956
www.eegonline.com

October 25, 2013
Control No. 171715
Page 3 of 4

Hanesbrand Inc.
Post Office Box 669
Clarksville, AR 72830

ANALYTICAL RESULTS

AIC No. 171715-1

Sample Identification: L359-047652 1013143 Heat Recov. Pit 10-16-13 8:00 10-17-13 8:00

Analyte	Result	RL	Units	Qualifier
Carbonaceous BOD 5-day SM 5210 B Prep: 18-Oct-2013 1454 by 285	540	100	mg/l	
	Analyzed: 23-Oct-2013 1143 by 285		Batch: W45329	
Total Suspended Solids USGS 3765 Prep: 21-Oct-2013 1551 by 285	57	10	mg/l	
	Analyzed: 22-Oct-2013 1416 by 285		Batch: W45346	

AIC No. 171715-2

Sample Identification: L359-047652 1013145 Treat Plant 10-17-13 8:30

Analyte	Result	RL	Units	Qualifier
Oil and Grease EPA 1654A Prep: 24-Oct-2013 0814 by 295	17	5	mg/l	
	Analyzed: 24-Oct-2013 1508 by 295		Batch: 88617	

A-6g



**E n v i r o n m e n t a l
E n t e r p r i s e G r o u p , I n c .**

220 North Knoxville Russellville, Arkansas 72801
Phone (479) 968-6767 Fax (479) 968-1956
www.eegonline.com

Client: Hanesbrands, Inc.
Date of Sample: 10/17/13
Time of Sample: 0940
Date Received: 10/17/13
Sample Collected From: Heat Rec. Pit
Sample Collected By: Megan Hatcher
Sample Matrix: Wastewater

Job Number: L359-047652
Date of Report: 10/25/13
P.O. Number: Not Given
Control Number: 1013144
Sample I.D.: Heat Rec. Pit
Sample Delivered By: M. Hatcher

ANALYSIS REPORT

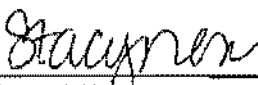
Parameter	Init.	Date	Time	Concentration	Units	Method
pH	MH	10/17/13	0940	7.3		4500H+ *

QUALITY CONTROL

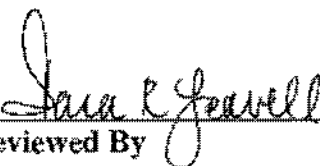
Parameter	Orig. Value	Dup. Value	Rel. % Difference
pH	7.38	7.37	0.14

All instruments have been calibrated on a daily basis. Each day, Quality Control procedures have been performed on 10% of all analysis.

**Approved by Standard Methods Committee, 1990.*



Reviewed By



Reviewed By

DATE OF INSPECTION: _____

TIME OF INSPECTION: _____

IU Name: Hanesbrand Inc.

INSPECTED BY: JAK

CHANGES OR ANTICIPATED CHANGES TO PROCESSES, PRODUCTS, CHEMICALS OR PRETREATMENT SINCE LAST INSPECTION:

2 dye machines add in July (large ones \$800k's)
Product development department; several small machines

PRODUCTS PRODUCED AND PROCESS DISCRIPTION:

Total manufacturing of woman's pantyhose

POLLUTION PREVENTION ACTIVITIES: DOES THE IU EMPLOY ANY OF THE FOLLOWING TO ENCOURAGE AND IMPLEMENT POLLUTION ACTIVITIES?

- (A) In-house environmental teams YES NO
- (B) Incentive programs for employee input on recycling, process improvement of other pollution prevention activities YES NO
- (C) What are you doing to conserve water?

recycle warm water, reduced rinse cycles on dye loads, new Bonans use less water per load

- (D) What are you doing to conserve energy?

recycle over 95% of waste (paper, cardboard, plastic yarn, oil and wood pallets. Have an energy team to reduce all energy within the plant.
Hanesbrand received energy star award 2009 & 2011

Attachment A7

CLARKSVILLE LIGHT AND WATER COMMISSION
INDUSTRIAL USER INSPECTION REPORT

NAME AND ADDRESS OF INDUSTRIAL FACILITY:

Hanesbrand Inc.
P.O. Box 6669
Clarksville AR. 72830

PHONE# 479-979-3459

DATE OF INSPECTION: 10-16-13

TIME OF INSPECTION: 0820

NAICS# 315111

SIC# 2250

I.U. PERMIT # 02

INSPECTED BY: Pam Smith /AK

Cathy Stalcup Plant Manager 479-979-3439
RESPONSIBLE OFFICIAL TITLE PHONE NO.

Cathy Stalcup
SIGNATURE

Eddie Shirley Environmental Manager
FACILITY REPRESENTATIVE TITLE PHONE NO.

Eddie Shirley
SIGNATURE

eddie.shirley@Hanes.com
E Mail

Eddie Shirley 970-8195 maintenance 979-5656
Emergency Contact (s)

Pam Smith Pretreatment Coordinator 754-7929
CL&W REPRESENTATIVE TITLE PHONE NO.

Pam Smith
SIGNATURE

INDUSTRY TYPE /CATEGORY Pantyhose Manufacturing

NATURE OF OPERATION knitting, dyeing, sewing operation

PURPOSE OF INSPECTION Annual

LAST OCCURRENCE OF NON-COMPLIANCE may 8, 2013 Flow

NUMBER OF EMPLOYEES 450 WORK HOURS PER DAY 5 WORK DAYS PER WEEK 24

WATER SOURCE CITY 302,100 GAL. WATER USAGE SANITARY 927,000 GAL.
Sept
1,697,900 - 6,972,600 = 1,682,500
1,447,000 = 3,056,500

PROCESS WATER 2,661,107 GAL.

COPY OF ALL OTHER PERMITS AIR, NPDES ect. ON FILE Air, Water

RAW MATERIALS:

Dyes, cleaners, finishes, some oil, yarn

DATE OF INSPECTION: _____

TIME OF INSPECTION: _____

IU Name: Hanesbrand Inc

INSPECTED BY: IAK

INDUSTRY WASTE STREAM FLOW MEASUREMENT (MANUAL, MECHANICAL, DESCRIPTION).

mechanical, one inside plant to meter water going to dye house
and one by influent pit going to treatment plant

LOCATION

inside main plant

CONFIRM ACCURACY

BEST MANAGEMENT PRACTICES

Describe any Best Management Practices activities which are either planned or which have been implemented.

Do not mix waste, no mixing hazardous waste, maintenance
personal and trained to clean up spills, Large spill kits stored
outside of maintenance office, small spill kits in other depart-
ments, recycling everything that we can, blow down goes into
containers and water is removed and oil is recycled.

PRETREATMENT FACILITIES OPERATION AND MAINTENANCE:

- (A) Standby power or other equivalent provisions provided generators for lights YES NO
- (B) Adequate alarm system for power or equivalent failures YES NO
- (C) Sludges and solids adequately disposed Yes No

Crystal clean

- (D) All treatment units in service Yes No
- (E) Consulting Engineer retained or available for consultation on operation & maintenance problems Yes No

A7c

DATE OF INSPECTION: _____

TIME OF INSPECTION: _____

IU Name: Hanesbrend Inc.

INSPECTED BY: 1/11

- (F) Qualified operating staff provided Yes No
- (G) Established procedures available for training new operators Yes No
- (H) Instruction files kept for operation and maintenance of each new item of major equipment Yes No
- (I) Operation and maintenance manual maintained Yes No

RECORDS AND REPORTS:

- (A) Adequate Records Maintained Of: Yes No n/a
 - (I) Sampling date, time, exact location Yes No n/a
 - (II) Analyses dates, times Yes No n/a
 - (III) Individual Performing analysis Yes No n/a
 - (IV) Analytical methods/techniques used Yes No n/a
 - (V) Analytical results Yes No n/a
- (B) Lab equipment calibration and maintenance records kept Yes No n/a
- (C) Quality Assurance Records Kept Yes No n/a

LABORATORY PROCEDURES:

- (A) Does the industry perform any lab analysis itself? Hanesbrend sets up sampler Yes No n/a
- (B) Sampling locations. Heat recovery pit; Effluent for oil + grease and pH Yes No n/a
- (C) Sampling / preservation technique EEG preserves bottles. Yes No n/a
- (D) Observation of IU self monitoring procedure Yes No n/a
- (E) EPA approved analytical testing procedures used Yes No n/a
- (F) If alternate analytical procedures are used, proper approval has been obtained Yes No n/a
- (G) Quality control procedures used Yes No n/a
- (H) Commercial Laboratory used Yes No n/a

Lab Name EEG

Lab Address 220 North Knoxville
Russellville AR 72831

Contact Mike Cole

Parameters tested for by commercial lab. C-BOD-5, TSS, Oil + Grease, pH
Temp.

A-7d

DATE OF INSPECTION: _____

TIME OF INSPECTION: _____

IU Name: Hanesbrand

INSPECTED BY: IAK

TOXIC ORGANICS MANAGEMENT PLAN:

(A) Description of discharge practice. Yes No n/a

From dye house goes through 3 sets of screens to heat recovery pit, then to pretreatment plant.

(B) Description of stored chemicals. Yes No n/a

all dyes are non hazardous; all chemicals are listed in spill Prevention, Control and Counter measure Plan included in this file
New premet black dye has chromium present, limited due to low production

(C) Procedures for notification of POTW of slugs or spill discharges. Yes No n/a

Spill kits are throughout the plant for spills; notify city personnel, fire department and coast guard if needed

(D) Procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, worker training, containment structures. Yes No n/a

chemicals are on spill proof pallets, only trained employes will transfer chemicals to usage area from storage area with fork truck.

(E) Floor drains accessible from storage and chemical usage areas. Yes No n/a

6" drain in boiler room that goes to sanitary sewer, drains in dye house go to pretreatment plant; 5 drains in compressor room and 2 drains in knit

A7e

DATE OF INSPECTION: _____

TIME OF INSPECTION: _____

IU Name: Hanesbrand Inc.

INSPECTED BY: LSA

(F) Manifests of shipments of hazardous wastes to proper disposal. Yes No n/a

Crystal Clean
miscellaneous chemicals,

(G) Does SIU have a TTO limit in permit? Yes No n/a

(H) Does SIU have an approved Plan to Control Slug Discharges or Toxic Organics Management Plan? Yes No n/a

updated may 24, 2011

(I) Evaluation of need of TOMP. Yes No n/a

Reason:

Has the IU complied with industrial user permit requirements? Yes No n/a

Comments:

IU inspection summary

Recommended action:

A-

DIVISION OF PUBLIC WORKS
INDUSTRIAL PRETREATMENT SECTION

SLUGG/SPILL EVALUATION CHECKLIST

SIU NAME: Hanesbrand Inc.

PERMIT NO.: 07 CONTACT: Eddie Shirley

1. SPILL PLAN

- a. Type on file: (PIPP, SPCC, TOMF, Contingency): _____ Date: 5-24-11
- b. Number of Spills in last 3 years: 0

2. CHEMICAL STORAGE

- a. Attach chemical list, including location of chemical, quantity stored, and container size. In SPCC
- b. Containment: Yes X No _____ Describe: burmed

Condition: Good X Fair _____ Poor _____ N/A _____

- c. Drains/Trenches: Yes X No X Routed to: Treatment Plant

Distance from storage tanks or drums (in feet): N/A

- d. Spill Potential (High, Medium, Low): Low

3. MANUFACTURING PROCESSES

- a. Process solutions in tanks

<u>Chemical Solution Name</u>	<u>Location (attach sketch)</u>	<u>Process Tank Size (in gallons)</u>
<u>In SPCC</u>	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

MANUFACTURING PROCESSES - Cont'd

- b. Do process solution tanks overflow? Yes No
If so, is overflow liquid contained? Yes No
Describe containment: w/a
Condition of containment: Good Fair Poor N/A
c. Drains/Trenches: Yes No Routed to: Treatment Plant
Distance from Process Tanks (in feet): w/a
d. Spill Potential (High, Medium, Low): Low

4. PRETREATMENT SYSTEM

- a. Evaluate potential for operating upsets: (High, Medium, Low): Low
b. Calibration frequency of instrumentation and/or equipment (specify):
(Example: pH probes)
pH daily
c. Spare parts on hand: Yes No
d. Excess wastewater holding capacity: Yes No
e. Is there a control system to monitor operation of pretreatment system?
Yes No
Describe corrective action which will be taken if an alarm condition occurs Hanesband or 2-3 w employees will be called to check alarm's
f. By-pass potential: High Medium Low N/A

5. LOADING/RECEIVING DOCKS

- a. Drains/Sumps: Yes No If "yes" where routed to:
Storm Sanitary Pretreatment Other

A-86

6. SPECIFIC PROHIBITIONS:

- a. Are any items present? Yes _____ No X
- b. Potential to discharge: High _____ Medium _____ Low _____ N/A ✓

7. NON-ROUTINE BATCH DISCHARGES:

- a. Does facility have these type of discharges? Yes _____ No X
(Defined as non-scheduled, occurring at 6 month frequency or longer).
- b. Name of chemical solution discharged: N/A

8. NON-DISCHARGED WASTES

- a. Are any generated? Yes _____ No X
- b. List these Non-Discharged Wastes, if "yes":

<u>Type of Waste</u> (Examples: waste solvent, waste oil, pretreatment sludge, etc.)	<u>Quantity per Year</u> <u>Generated</u>	<u>Disposal Method</u>
<u>N/A</u>		

- c. Describe protective measures to prevent accidental discharge of these substances into the sanitary sewer system:

N/A

A-8c

RECOMMENDATIONS

- a. _____ Existing Spill Plan adequate, Combined Slug/Spill Control Plan not needed. In Place
- b. no New Slug/Spill Control Plan required
- c. no Add slug provisions to existing Spill Plan
- d. n/a Other deficiencies to be corrected: _____

- e. _____ No Slug/Spill Control Plan is necessary at this facility.

one in place

Signature: Dan Smith

Date: 10-8-12

A-8d

