ADEQ

ARKANSAS
Department of Environmental Quality

September 21, 2007

Hugh Harrison
General Manager
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. Harrision:

Please find enclosed the finished report for the audit/assessment conducted June 12 – 14, 2007. The contents should be made available for review by appropriated City officials. Discussions and an evaluation should be made concerning the recommendations and required actions. Please respond in writing within thirty (30) days to the audit findings with proposed corrective actions.

In this auditor's opinion, the City has a staff well qualified and very involved in the Program and its implementation. They should be lauded for their efforts. The public outreach with quarterly newsletters regarding various environmental issues will, in the future, help the citizens of Clarksville truly all become stakeholders. Kudos goes out from this office to yours.

Most Program deficiencies identified in the attached Audit/Assessment seem to be minor and administrative in nature. However, the City should take into account its responsibility to follow more aggressive enforcement options for recurring industrial violations before significant non-compliance criteria is met.

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

Feel free to contact this office with any questions.

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
ADEQ State Pretreatment Coordinator

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

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF CLARKSVILLE, ARKANSAS

NPDES PERMIT #AR0022187

September 21, 2007

PREPARED BY: ALLEN GILLIAM

ADEQ STATE PRETREATMENT COORDINATOR

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LIST OF ATTACHMENTS

A) INTRODUCTION

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

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

An audit/assessment was performed June 12 – 14, 2007, of the Pretreatment Program implemented by the City of Clarksville (City Light and Water), Arkansas. Participants included:

Allen Gilliam	ADEQ/State Pretreatment Coordinator
Pam Crow	CL&W/Pretreatment Coordinator
Greg Rainey	CL&W/Wastewater Superintendent
Hugh Harrison	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

*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 2/14/83.

Program modifications were submitted, approved and incorporated on 10/27/94 and then again on 3/20/2002. Modifications included a headworks loading evaluation that indicated that Technically Based Local Limits (TBLL) may be necessary for Zn and Cu (more data was being collected for a final determination) but were not necessary for other parameters; incorporation of an Enforcement Response Plan; and narrative changes to the City's Pretreatment Program and Ordinance.

The most recent correspondence from the City (5/17/04) requested TBLLs to be removed since their outfall had been re-designated with a different 7Q10. No documented activity has occurred regarding this request to date.

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 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.

The POTW has a design flow of 2.0 MGD (including the holding lagoon) and an average flow of ~1.5 MGD. Approximately 4.5% of that is from 4 significant industrial contributors, 2 of which are categorical metal finishers.

Approximately 139 dry tons of exceptional quality biosolids are land applied per year.

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 four (4) 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-13.

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)(iii)***, "Notify Industrial Users identified under paragraph (f)(2)(i) of this section, of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act..."

a) Provide notification to the City's IUs of the most recent "streamlining" revisions to ***40 CFR 403***.

b) Provide notification to the City's hazardous waste generators their notification requirements under ***40 CFR 403.12(p)***. The ADEQ haz waste generators on the list provided during the audit should be sent this notification as well as the City's dentists, hospitals, chiropractors, veterinarians, photo processors and X-ray clinics (sources suspected of generating mercury and/or silver laden wastewater).

Documentation that these requirements were fulfilled could not be located during the audit. The physical movement of these type facilities around the state, in this office's opinion, necessitates periodic notification.

2) Under ***40 CFR 403.8(f)(1)(iii)(B)(3)***, "[Permits must include] Effluent limits, including Best Management Practices [BMP], based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law.

a) The metal finishers' permits only had the monthly average CFR 433 limits but, must include the daily maximum limitations as well (See Attach. A-2d)

b) Baldor's permit must reflect pretreatment standards for new sources under CFR 433.17. The facility's operations didn't begin until after the promulgation date of CFR 433.

[side note: the above regulation citation will require TOMPs and Slug Control Plans (BMPs) to be included in applicable permits once the City's program is modified to be current with the revised CFR 403 regulations.]

3) Under ***40 CFR 403.12 (l)***, "...the reports required by paragraphs (b), (d), and (e) of this section shall include the certification statement as set forth in ***40 CFR 403.6(a)(2)(ii)***,..."

Not all IU reports (nor applications) had this required certification statement and must be revised and enforced (See Attachments A-7f & A-9).

4) Under ***40 CFR 403.8(f)(1)(vi)(A)***, "Obtain remedies for noncompliance by any Industrial User with any Pretreatment Standard and Requirement."

And, under the City's approved ***Pretreatment Program's Enforcement Response Plan*** (ERP), page 6-12 (Attach. A-13) the City should have escalated its enforcement options beyond the NOV stage because of the recurring O&G violations from Hanesbrand.

In this office's opinion, the Consent Administrative Order finally issued to the facility should have been the enforcement action taken long before the thirty-two recurring violations for O&G during the 2006 reporting year. See Attachments A-3 & 4 for further documentation.

The City should escalate enforcement action before the significant non-compliance criteria is met for any of its industries.

5) Under ***40 CFR 403.8(f)(2)(vii)***, "Investigate instances of noncompliance with Pretreatment Standards and Requirements, as indicated in the reports and notices required under §403.12, or indicated by analysis, inspection, and surveillance activities described in paragraph (f)(2)(v) of this section. Sample taking and analysis **and the collection of other information** shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions..."

Chain of custodies (see Attach. A-9b for example) weren't complete. The "chain" is not complete without a "received by" person's signature and would not be admissible in an enforcement proceeding. Discussions with Pretreatment personnel concluded with a possible solution.

6) Under ***40 CFR 403.12(g)(3)***, "The reports required in paragraphs (b), (d), (e) and (h) of this section must be based upon data obtained through appropriate sampling and analysis performed during the period covered by the report, which data are representative of conditions occurring during the reporting period. The Control Authority shall require that frequency of monitoring necessary to assess and assure compliance by Industrial Users with applicable Pretreatment Standards and Requirements. **Grab samples must be used for pH, cyanide**, total phenols, oil and grease..."

The metal finishers' permits must be revised to require grab samples for CN (See Attach. A-2d).

7) Under ***40 CFR 433.12(a),*** In lieu of requiring monitoring for TTO, the [City] may allow dischargers to make the following certification statement: "Based on my inquiry of the person or persons directly responsible for managing compliance with the 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 filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the [City]..."

And, under ***40 CFR 433.12 (b)*** In requesting the certification alternative, a discharger shall submit a solvent management plan that specifies **to the satisfaction of the permitting authority**..."

The City must have on file documentation that the metal finishers' toxic organic management plan (TOMP) was satisfactory. It is insinuated some form of documentation should be made indicating the City's approval.

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

1) Recommend clarifying the Metal Finishers' TTO certification/waiver allowance in their permits. Attachment A-2d mentions "As required by POTW". And, Attachment A-2p includes the requisite certification statement. But, these two don't seem to be connected by any other language explaining the provisions in 40 CFR 433.12. Please revise the metal finishers' permits to clarify the sampling waiver. A more comprehensive footnote on the permit limits' page may be all that is necessary.

2) Recommend including more pertinent information on each of the permitted industries' fact sheets. Attachment 8 gives a typical example of what the city is currently using. See Appendix I in EPA's "Industrial User Guidance Manual" for possible information to add.

3) Recommend identifying exact sampling points with footages from fixed reference points. The description given on Attachment A-2d would be difficult for a new inspector to find if a knowledgeable plant representative was not present to guide him/her to the "rinse tank". Actual pictures of the sampling sites were suggested.

4) Recommend permit applications include pollution prevention (P2) activity questions. A definition could be included with the question: "Pollution should be *prevented* or *reduced* at the source whenever feasible. How are you accomplishing this?"

Other questions could include: P2 activities currently underway such as employee training, inventory control, reduction in toxic releases, in-process recycle, countercurrent rinsing, water/energy conservation, best management practices, etc.

5) Recommend Baldor submit a more comprehensive toxic organic management plan. The one on file didn't appear to be adequate. One that the City Pretreatment personnel can "approve" and document as acceptable.

6) Recommend more narrative on the IU inspection reports regarding chemical, especially hazardous waste chemical handling procedures. Are chemicals transported from point A to point B via buckets carried by employees, fork lifted totes, hardlined, etc.? Are the chemicals transported through areas that do have floor drains?

7) Recommend conducting another comprehensive industrial/business survey. 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, dentist office or clinics, long term health care

facilities, etc. are some examples of "sectors". See EPA's website for more information: www.epa.gov/compliance/resources/publications/assistance/sectors/notebooks/index.html .

The City's last survey was conducted in 2001 with a fairly good, yet general questionnaire (Attachment A-1).

8) Strongly recommend developing a standard operating procedures manual for the day-to-day activities performed by the city's pretreatment personnel. Data management, (handling/tracking/logging in) of industry correspondence, inspection **and sampling protocols** specific to the city's industrial users and other "in the head" procedures actually documented would be very useful to help educate and cross train other city personnel in the Pretreatment Program's procedures. There are various EPA guidance documents as well as excellent examples of city manuals circulating that contain very good example SOPs if desired.

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

10) Include P2 audits/assessments as an enforcement option in your existing enforcement response plan.

11) Recommend revising the City's Pretreatment Ordinance language regarding local limits referring back to the section in the Program where the maximum allowable headworks' and industrial loadings are actually illustrated and discussed.

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

1) Modify the City's current Pretreatment Program to be current with the revised ("streamlined") version of the National Pretreatment Regulations in 40 CFR 403.

****

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Clarksville NPDES #: AR0022187
Mailing address: P.O. Box 1807, Clarksville Light & Water
Clarksville, AR 72830

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

Telephone: 479.754.7929 FAX NUMBER: 479.754.8181

Pretreatment Contact: Pam Crow Title: Pretreatment Coordinator
Address: "
Telephone: "
E-mail pamcrow_cwl@yahoo.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: 6/12 - 14/07 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
*Pam Crow	Pretreatment Coordinator	479.754.7929
Greg Rainey	Wastewater Superintendent	"
Hugh Harrison	General Manager	479.754.3148

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	8/11/05	No apparent problems noted
PCI	10/25/04	No apparent problems noted

YES	NO	
___	✓	Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action: _____

_____

_____

_____

_____

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

. . . . . .

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

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0022187	Main	1/1/04	12/31/08

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Main*
Location Address: 1305 South Crawford, Clarksville, AR
*(*includes a separate 3-cell lagoon - outfall #002 which is an HCR facility for heavy rain events)*
Treatment Plant Wastewater Flow: Design- 2.0 MGD; Actual (Average)- 1.67 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 4 # of CIUs : 2
Industrial Flow (mgd): 0.0446 Industrial Flow (%) : 2.67 %

Level of Treatment		Type of Process(es):
Primary	✓	(#002) three cell extended lagoon
Secondary	✓	(#001) primary extended aeration, activated sludge; oxidation ditch; followed by secondary clarification
Tertiary		

Method of Disinfection: chlorination

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

Effluent Discharge

Receiving Stream Name: Lake Dardenelle

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

Receiving Stream Use: primary & secondary contact/fishable

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

Method of Sludge Disposal:		Quantity of Sludge:	
✓	Land Application	139	dry metric tons/yr. ("EQ")
	Incineration		dry tons/yr.
	Monofill		dry tons/yr.
	Mun. Solid Waste Landfill		dry tons/yr.
	Public Distribution		dry tons/yr.
	Lagoon Storage		dry tons/yr.
	Other (specify)		dry tons/yr.

List of toxic pollutant limits in NPDES permit: #001 - conventionals
#002 - conventionals

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

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:
Reference to 40 CFR 503

YES NO N/A

✓ ___ ___ Has the Control Authority submitted results of whole effluent biological toxicity testing.

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) _____

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

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

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

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

YES NO N/A

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

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

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

Parameters Violated	Cause(s)
Fecal Coli.	Not enough detention time

YES NO

___ ✓ Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES	NO	
N/A		Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]
✓		Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below. Correspondence dated 5/17/04 from City included a statement that "Local limits weren't necessary". It was not considered an official request for Program modification and the L.L. issue is is still in a "pending" mode. Outfall designation has been changed since the latest audit and new ADEQ MAHLs have not been supplied

1. Modifications:

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

2. Modifications in Progress:

Date Requested	Nature of Modification
5/17/04	Re-evaluation of MAHLs/necessity of TBLLs (Zn & Cu)
	(See above discussion)

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

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

Date of original Pretreatment Program approval: 3/1/83 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 2/11/02
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?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

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

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

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

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	N/A			
2.				

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

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

Briefly describe other problems:

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

IU Name	Problem	NPDES Permit Violation Yes	No
n/a		___	___

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

✓ ___ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *(Last one done in early 2001. See Attachment A-1 for example)*

✓ ___ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity? *Questions about P2 and BMPs are asked (See Attch A-1)*

✓ & ✓ Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *Written in general terms in the Program, but no SOP manual with details*

___ ✓ If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2 reference materials to the IUs which qualify?

What methods are used to update the IWS:
- ✓ Review of newspaper/phone book
- ✓ Review of plumbing/building permits
- ✓ Review of water billing records
- ___ Permit reapplication requirements
- ✓ Onsite inspections
- ___ Citizen involvement
- ✓ Other (specify) 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. 4 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 2 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 2 Noncategorical SIUs
d. 0 Other regulated nonsignificant IUs (Describe)_____
4 TOTAL of a. + d.

YES NO

✓ ___ Has the POTW identified any IUs with Pollution Prevention opportunities?

✓* ___ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1)(i-ii)] **Not the new 403 definition*

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

Describe the Control Authority's approved control mechanism (e.g., permit, etc.): permit (*See Attch. A-2 for example*)

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

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

IU NAME	PERMIT EXPIRATION DATE

YES NO

___ ✓ Does the Control Authority accept trucked septage wastes?

___ ✓ Does the Control Authority accept other trucked wastes?

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

YES	NO	
N/A	___	Does Control Mechanism designate a discharge point? [403.5(b)(8)]
___	___	Are all applicable categorical standards and local limits applied to trucked wastes ?

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

Pollutant	Limit
N/A	

Describe the discharge point(s) (including security procedures):

___

___

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

___ ✓ Does the Control Authority have a control mechanism for regulating wastes from UST sites?

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

Pollutant	Limit
n/a	

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? **Probably did initially back in the early '90s but should repeat this requirement.*

_____?____ Date Notified _____?_____ 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. Submittal couldn't be considered official; Outfall location/designation has been changed and new MAHLs have yet to be provided.		

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)] **Prior to outfall being designated differently.*

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓	___	___	✓	___	✓	n/a
Cadmium (Cd)	✓	___	___	✓	___	✓	
Chromium-Total	✓	___	___	✓	___	✓	
Copper (Cu)	✓	___	___	✓	___	✓	
Cyanide (CN)	✓	___	___	✓	___	✓	
Lead (Pb)	✓	___	___	✓	___	✓	
Mercury (Hg)	✓	___	___	✓	___	✓	
Molybdenum (Mo) *	✓	___	___	✓	___	✓	
Nickel (Ni)	✓	___	___	✓	___	✓	
Selenium (Se) *	✓	___	___	✓	___	✓	
Silver (Ag)	✓	___	___	✓	___	✓	
Zinc (Zn)	✓	___	___	✓	___	✓	

** - 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:

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

YES NO

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

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

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1/yr	1/year	N/A
Other SIUs	"	1/year	"
Sampling:			
CIUs	4/yr	1/year	Better compliance assurance
Other SIUs	"	1/year	"
Reporting:			
CIUs	12/yr	2/year	To keep a good handle on
Other SIUs	"	2/year	WW characteristics
Self-Monitoring:			
CIUs	12-104	2/year	Varies per industry
Other SIUs	"	2/year	for CBOD & TSS

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

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

Does the Control Authority routinely split samples with industrial personnel:

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

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

	Analytical Method *	Name of Laboratory
Metals	furnace	American Interplex (AI)
Cyanide	spectro	EEG
Organics	GC/MS	"
Other	WET	AI

Were all wastewater samples analyzed by 40 CFR 136 methods?

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe: City relies on EPA and State's certification requirements. They are using more clean hand/dirty hand sampling techniques now and have sent splits & knowns 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
1day Metals
2 wks Organics

___ ✓ Is there an established protocol clearly detailing sampling location and procedures?

___ ✓ Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: 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)] **Not the current "streamlining" definition.*

✓ ___ 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)]

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

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

✓ Imprisonment
✓ Termination of Service
_____ Other: _____

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: appears to be a problem with escalating enforcement against Hanesbrand (Sara-Lee). See below & discussion in final audit report required actions and recommendations.

YES	NO	
___	✓*	When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)] **Hanesbrand's re-curring O&G violations only resulted in continued NOVs for too long a period of time without escalation. See Attchs. A-3 & A-5 for examples of some "NOVs".*
✓	___	Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)]. Comment: _____
___	✓	If no, does the Control Authority conduct all of the monitoring?

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

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	No
Hanesbrand	5/06	NOVs & CAO *(See Attch. A-4 for CAO)*	5/06 thru current		✓

Indicate the number and percent of SIUs that were identified as being in significant noncompliance during the past Pretreatment reporting period: *[1/1/06 -12/31/06]*

#	%	
1	25	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [WENDB-MSNC]
0	0	Reporting requirements [WENDB-PSNC]
0	0	Pretreatment compliance schedule [WENDB-SSNC]
0		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

Has the Control Authority experienced any of the following:

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

YES NO

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

1 How many SIUs are currently on compliance schedules?

___ ✓ Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

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

	Number	Amount
Civil	0	$
Administrative	1*	$ 33,678 (recouped cleaning costs, not really a penalty)
Total	1	$ 33,678 [WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

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

Can IU monitoring data can be retrieved by:

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

✓	Are all records maintained for at least 3 years?

K. RESOURCES

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

Approx. 1.5

YES	NO	
	✓	Have any problems in program implementation been observed which appear to be related to inadequate funding?

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

		Percent of Total Funding
✓	POTW general operating fund	100
	IU permit fees	
	monitoring charges	
	industry surcharges	
✓	other (describe) Separate sewer charges	?
	Total	100%

SECTION II: PROGRAM ANALYSIS AND PROFILE

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: _____ _____

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

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

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	Standard equip _____
✓	___	Safety equipment	" _____
✓	___	Vehicles	" _____
✓	___	Analytical equipment	" _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
   Inspection forms now have some 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 school kids; internship (lab) with some of the local vo-tech and college students; 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. *Greenville Tube replaced its nitric acid with citric (see attch A-6)

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 Cline & Clark Rd., P.O. Box 669
Industry Description Nylon fabric weave for hosiery
Industrial Category n/a 40 CFR n/a SIC Code: 2251
Ave. Total Flow (gpd) 75,000 Ave. Process Flow (gpd) 45,000

Industry visited during audit: YES

Comments: Nylon, spandex & lycra yarns, dyeing. Facility changed yarn suppliers. O&G problems are believed to be coming from the type "lubricant" in the new yarn.

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 Code: 2037
Ave. Total Flow (gpd) 33,000 Ave. Process Flow (gpd) 21,000

Industry visited during audit: YES

Comments:

FILE #: 3 Industry Name Baldor File/ID No. #7
Industry Address #1 R.S. Boreham Drive, 72830
Industry Description Manufacture & Assbly of sub-fractional electric motors
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3621,3566
Ave. Total Flow (gpd) 913 Ave. Process Flow (gpd) 600 (batch)

Industry visited during audit: YES

Comments: Should be permitted as a new source under CFR 433.17 based on when facility went into operations

FILE #: 4 Industry Name Greenville Tube Corp. File/ID No. #6
Industry Address South Montgomery St. 72830
Industry Description Stainless steel tube manufacturer
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3317
Ave. Total Flow (gpd) 9,000 Ave. Process Flow (gpd) 1,500

Industry visited during audit: YES

Comments: Nitric acid (have recently switched to citric acid) passivation of SS tube

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

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

1. Does the file contain an application for a control mechanism? *(See Attch. A-7 for example)*	✓	✓	✓	✓	
If yes, what is the application date?	7/06	3/03	12/03	12/03	
Does it ask for Pollution Prevention information?	no	no	no	no	
2. Does the file contain a Permit?	✓	✓	✓	✓	
Permit Expiration Date?	✓	✓	✓	✓	
Is a fact sheet included?	✓	✓	✓	4	
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	8/11	5/08	1/09	1/09	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	✓	✓	5,7&8	5 & 8	
e. Appropriate self-monitoring requirements?	✓	✓	6	6	
f. Sampling frequency?	✓	✓	✓	✓	

Comments: 1) IU changed from nitric to citric acid; 2) Solvents recycled for re-use; 3) Heat recovery; 4) Could be more comprehensive (see Attch. A-8); 5) Metal finishers only have monthly avg limits under CFR 433; 6) Their CN samples should be "grab". See Attch. A-2; 7) Limits should reflect PSES in 433.17; 8) Metal finishers' permit limit page needs clarification regarding the TTO monitoring waiver via their TOMPs submitted

SECTION III: INDUSTRIAL USER FILE REVIEW

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

C. Application of Standards

1.	Has the IU been properly categorized?	✓	✓	4	✓	
2.	Were both Categorical Standards and Local Limits properly applied?	✓	✓	5	5	
3.	Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	no	no	no	no	
4.	For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	n/a	n/a	n/a	n/a	

Comments: 1) Could be more specific with footages from fixed reference points. Actual pictures were discussed; 2) CN should analyzed via a grab sample. On the permit limit page, "24 hr composite" should specify whether it's flow or time proportioned; 3) Permit's reporting requirement is correct but IU didn't submit the full certification statement (see Attch. A-9); 4) As mentioned previously, this CIU should be permitted as a new source under 433.17; 5) Daily max. limits under 433 must also be included on the permits' limit page

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	n/a	n/a	n/a	n/a	
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	
D. Compliance Monitoring Sampling					
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	1	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	

Comments: 1) City's current C of C with their contract lab isn't complete: no "received by: *person*" was noted until it reached the lab (see Attch. A-9b). This was discussed with city personnel and will be corrected.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	n/a	n/a	1	2	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	3 no	3 no	3 no	3 no	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	
Inspections (See Attch. A-11 for example)					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	
b. Date of last Inspection	12/06	9/06	11/06	9/06	
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	n/a	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	✓	✓	✓	✓	
f. Evaluation of pretreatment facilities?	✓	✓	✓	✓	

Comments: 1) Didn't appear adequate; 2) See Attch. A-10 for good example; 3) permit narrative language indicates "timed composites" for BOD & TSS only (See Attch. A-2k);

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
g. Evaluation of self-monitoring equipment and techniques?	✓	✓	✓	✓	
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	✓	✓	✓	1	
i. Manufacturing facilities?	✓	✓	✓	✓	
j. Chemical handling and storage procedures?	2	2	2	2	
k. Chemical spill prevention areas?	✓	✓	✓	✓	
l. Hazardous waste storage areas and handling procedures?	n/a	2	2	2	
m. Sampling procedures?	✓	✓	✓	✓	
n. Laboratory procedures?	✓	✓	✓	✓	
o. Monitoring records?	✓	✓	✓	✓	
p. Evaluation of Pollution Prevention opportunities?	3	3	3	4	
q. Control Authority inspector signature?	✓	✓	✓	✓	
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	✓	✓	✓	✓	
11. Does the file include:					
a. BMR?	n/a	n/a	arch.	arch.	
b. 90-Day Report?	n/a	n/a	arch.	arch.	
c. All periodic reports?	✓	✓	✓	✓	
d. Compliance schedule reports?	n/a	n/a	n/a	n/a	
12. Did the IU report on all required parameters?	✓	✓	✓	✓	

Comments: 1) See Attch. A-12 for example; 2) Inspection form could include questions about the IU's chemical (especially haz waste) handling procedures; 3) Sections ask about P2 and BMPs but it could be more specific; 4) This IU did implement a P2 activity and their "story" should be documented (See Attch. A-6 for notice from IU) since they switched from nitric to citric acid.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
13. Did the IU comply with the required sampling frequency(s)?	✓	✓	✓	✓	
14. Did the IU report flow?	✓	✓	✓	✓	
15. Did the IU comply with the required reporting frequency(s)?	✓	✓	✓	✓	
16. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	✓	1	
17. Did the IU report all changes in its discharge? [403.12(j)]	✓	n/a	n/a	See comment #4 above	
18. Has the IU developed a Slug Control and Prevention Plan? *(Evals were done. See Attch. A-12 for example)*	2	2	2	2	
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	--	--	--	--	
b. Did POTW respond to the spill?	--	--	--	--	

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	✓	✓	✓	3	
b. IU self-monitoring results?	✓	✓	✓	n/a	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	n/a	n/a	✓	n/a	

Comments: 1) IU's certification statement was not complete (see Attch. A-9); 2) Included with IUs' spill prevention control plan; 3) See Attch. A-5

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
2. How many reports submitted during the past reporting year indicated discharge violations?	32	1	4	0 (City monitored)	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	✓	✓	✓	n/a	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	✓	✓	✓	✓	
5. Were all nondischarge violations identified in the file?	n/a	✓	n/a	n/a	
6. Was the IU notified of all violations?	✓	✓	✓	✓	
7. Was follow-up enforcement action taken by the Control Authority?	1	✓	✓	✓	
8. Did the Control Authority follow its approved ERP?	1	✓	✓	✓	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	no	✓	✓	✓	
10. Is there a compliance schedule? If yes:	✓	no	no	no	
11. Were there any compliance schedule violations?	2	--	--	-	
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	

Comments: 1) It appears the city did not follow its own ERP in that the IU had numerous O&G violations re-curring over a lengthy period of time with only NOVs being sent them. See Attchs. A-3 (especially 3-g for history of O&G violations) and A-4 for example NOVs and the CAO recently issued; 2) The CAO has not been in effect long enough to determine compliance with its schedule.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	
b. TRC	✓	✓	✓	✓	
c. Pass through/Interference	✓	✓	✓	✓	
d. Spill/slug loads	✓	✓	✓	✓	
e. Reporting	✓	✓	✓	✓	
f. Compliance schedule	✓	n/a	n/a	n/a	
g. others (specify)					
13. Was the SIU published for SNC?	✓	n/a	n/a	n/a	
Date of publication.	1/24/07	--	--	--	

Comments:

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Clarksville NPDES #: AR0022187

Date of Audit: 6/12 - 6/14/07 Date entered into QNCR: 9/21/07
(ASSESSMENT)

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

*Most administrative deficiencies easily corrected and had no impact on the overall Program

SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Clarksville NPDES #: AR0022187

Name, address and phone number of industry:
Hanesbrands Inc. 1904 Clark Rd. 479.979.3401

Type of industry: Hosiery Producer Date/Time of visit: 6/13/07 / 9:15 a.m.

Industry contacts: Chis Allen-Plant Mngr/Eddie Shirley-Safety & Env. Mngr/Cathy Stalcup

	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	✓		

*City operates & maintains the 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.

Visit conducted by: Gilliam/Crow/Rainey Date: 6/13/07

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:

Facility brings in different type yarns from vendors and strands them into 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 room.

After the white hosiery is formed, they are placed in bags to be washed/dyed in round tubs for a pre-determined (agitated) time until they're saturated.

The dye is pumped from numerous totes to their appropriate wash/dye machine. They're getting away from having to "dolly" any of the dyes to the (8) wash/dying machines.

After the dying operation, the products are sent to the drier room. The IU does capture heat from this process for pre-heating the wash/dye cycle.

There is some coarse screening in the floor troughs for catching "most" of the tags and hosier from reaching the outside pretreatment "plant".

Wastewater (high BOD) from the wash/dying flows to the outside activated biological pretreatment system (4 concrete, in-ground aeration basins) with one side acting as a clarifier.

City Pretreatment personnel very familiar with IU's operations.

IU is actively pursuing installing additional O&G removal since they've started having problems with whatever new lubricant is arriving on their base yarn stock.

Visit conducted by: Gilliam/Crow/Rainey Date: 6/13/07

Allen Gilliam

(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:

6/13/07 / 10:36 a.m.

Industry contacts: Jeff Hannon-Mngr of QA/Compliance / Johnny Finn-Env. Technician

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

Additional comments:

Facility had not changed any processing since the last audit and only the outside pretreatment facility and sampling areas were visited. The preparation, packaging and freezing operations were not in operation the day of this visit.

Visit conducted by: Gilliam/Crow/Rainey Date: 6/13/07

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: Bright Harvest Foods

Additional comments:

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

After bulk solids removal (most to cattle farmers, some for land application sites thru TRS) wastewater is treated through a small clarifier/settling basin then to a secondary clarifier, an aerated (2 aerators) pond, serpentine flows to a second two-cell aerated lagoon. A couple of "fountains" have been recently added to hopefully aid in aeration and evaporation.

Flow and monitoring is conducted in a 10" pipe within an enclosed sampling station ("hut").

City coordinator seemed to have very good knowledge of this IU and indicated successful water conservation measures have taken place over the last few years at this facility.

Two potential (probably small) wastewater discharges were identified during site visit: one possibly from their cooling tower and another from their ammonia tank. City reps indicated they'd follow up on this by requiring updated schematics.

Visit conducted by: Gilliam/Crow/Rainey Date: 6/13/07

Allen Gilliam

(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, S. Montgomery St, 479.754.6500

Type of Industry: CFR 433 Date/Time of visit:

Mfg. Stainless Steel Tube Products 6/13/07 / 1:12 p.m.

Industry contacts: Cathy Rocole - Env. Mgr.

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

*Replaced Nitric with Citric Acid for passivation

Additional comments:

Facility does not bring in SS (strips) rolls and removed their "rolling mills" since the last audit (11/02). Stainless Steel (SS) seamless and welded tube "hollows" they're starting with at present (almost all is ASTM 312). They've also replaced (4/07) their nitric acid with citric to achieve passivation of their SS tube products.

Visit conducted by: Gilliam/Crow/Rainey Date: 6/13/07

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 still degreased with trichlorethylene (ran through a distillation unit for re-use), rag wiped, then annealed at 2050 F in a disassociated NH_3 atmosphere. 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).

Products are cut to length, deburred, polished if necessary, logo-printed then sent to the passivation process. Coolant fluids are filtered for re-use. 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 and that's on a continual basis (~1,500 gpd). Other wastewater on-site includes their pressure test (ultrasonic) tank (which is rarely discharged).

City needs new schematic and up-to-date process description from the facility.

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.

Visit conducted by: Gilliam/Crow/Rainey Date: 6/13/07

Allen Gilliam

(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:

Baldor Electric, #1 R.S. Boreham Drive 479.754.1429

Type of industry: CFR 433 Date/Time of visit:

Electric Motors & Gear Boxes 6/13/07 / 2:35 p.m.

Industry contacts: Mike Parks - Mfg. Engineer (tool designer)

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

Additional comments:

Facility manufactures and assembles sub-fractional electric motors (up to about ½ horsepower) and gear boxes. IU hasn't changed processes substantially since the last site visit back in 11/02.

Visit conducted by: Gilliam/Crow/Rainey Date: 6/13/07

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: Baldor Electric

Additional comments:

Raw material includes aluminum castings (outside produced), cast iron, steel, zinc, bronze and copper.

Wastewater generated is from a simple 3 stage alkaline clean, Zn phosphatizing operation followed by the finishing rinse with rust preventative. They batch discharge (manually) the rinse about 6/day at 120 gallons per dump. IU rep indicated they would probably be getting rid of this process. That would include the powder coat process. These ops would be sent to a company in Fort Smith.

Only the aluminum and steel parts (armatures, steel tubes and castings) are cleaned prior to being powder painted.

Southwest Die in Fort Smith provides their cast housings and gear boxes.

Solvents used from the paint clean-up operation is hauled off-site at about 3 drums per quarter.

The gear boxes are hot water detergent washed which is rinsed off and sent off-site for disposal.

Other non-process water operations include basic machining for final assembly of finished motors/gear boxes.

Facility practices "flex-flow" for just in time or lean manufacturing to reduce mass inventory.

Visit conducted by: Gilliam/Crow/Rainey Date: 6/13/07

Allen Gilliam

(signature of auditor conducting visit)

example water billing record.

Account : 4726 0 LEN DOLLAR Ten/Own : O
Address1 : 1171 S ROGERS ST Adrees2 :
Cycle : 1 Street# : 1171 Street Name : S ROGERS ST Street Mod :
Route : 14 City : CLARKSVILLE Province: AR Unit#: Region:
Walk : 1255 Zip Code: 72830 Mail post mode :

WATER

Service Type : W WATER Str. Date : 11/01/1997 End Date : Last Read: 08/07/2001 Due Date : 09/04/2001
Cent_Mtr : Inact From: Inact To : Interest : N Code : 1 Mtr Loc. :
Bill Copies : 1 Category : C COMMERCIAL CUSTOMER Final Pend: Lst Mth Bill: 8
Last Billed : 08/20/2001 Dep Req : 0.00 Deposits to Collect: 0.00

WATER READING

Read Date	Days	BillType	Usage	Avg/Day	Amount Billed
08/07/2001	32	Regular	6300.00	196.875	14.13
07/06/2001	30	Regular	6900.00	230.000	15.45
06/06/2001	34	Regular	6300.00	185.294	14.13
05/03/2001	28	Regular	6500.00	232.143	14.57
04/05/2001	29	Regular	9900.00	341.379	22.05
03/07/2001	29	Regular	10800.00	372.414	24.04
02/06/2001	29	Regular	10300.00	355.172	22.94
01/08/2001	33	Regular	9800.00	296.970	21.83
12/06/2000	30	Regular	14100.00	470.000	31.16
11/06/2000	32	Regular	4000.00	125.000	9.02
10/05/2000	28	Regular	5000.00	178.571	11.21
09/07/2000	34	Regular	3100.00	91.176	7.05
08/04/2000	21	Regular	2000.00	95.238	4.64
07/14/2000	29	Regular	2200.00	75.862	5.07
06/15/2000	31	Regular	2600.00	83.871	5.95
05/15/2000	30	Regular	8600.00	286.667	19.11
04/15/2000	31	Regular	14500.00	467.742	32.33
03/15/2000	29	Regular	11200.00	386.207	
02/15/2000	31	Regular	14700.00	474.194	
01/15/2000	31	Regular	15300.00	493.548	
12/15/1999	30	Regular	15900.00	530.000	
11/15/1999	31	Regular	13600.00	438.710	
10/15/1999	30	Regular	13300.00	443.333	
09/15/1999	31	Regular	11700.00	377.419	
08/15/1999	31	Regular	17800.00	574.194	
07/15/1999	30	Regular	17500.00	583.333	
06/15/1999	31	Regular	14400.00	464.516	
05/15/1999	30	Regular	16100.00	536.667	
04/15/1999	31	Regular	6200.00	200.000	
03/15/1999	28	Regular	27100.00	967.857	
02/15/1999	31	Regular	14900.00	480.645	
01/15/1999	31	Regular	10900.00	351.613	
12/15/1998	32	Regular	11400.00	356.250	
11/13/1998	29	Regular	10700.00	368.966	
10/15/1998	30	Regular	29300.00	976.667	

Attachment A-1

Copy

full

Clarksville Light & Water Co. Commission

Clarksville Arkansas

Non – Residential Wastewater Questionnaire

Name and Address of Facility **Date**_____

_____ **Time**_____

_____ **SIC Code**_____

_____

Phone #_____

Responsible Official	**Title**	**Phone No.**	**Signature**

Facility Representative	**Title**	**Phone No.**	**Signature**

CL&W Representative	**Title**	**Phone No.**	**Signature**

Industry Type /Category _____

Purpose Of Inspection _____

Number Of Employees_____ **Work Hours Per/Day** _____ **Work Days Per/Week** _____

Total Water Usage_____ **gal.**

Sanitary Sewer Discharge _____**gal. Process Water** _____**gal.**

Raw Materials Used_____

_____

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Products Produced_____

_____

Process Discription_____

Where Are Metal Shavings / Scraps Stored?_____

_____

How Are Metal Shavings / Scraps Disposed Of? _____

_____

How Often ? _____

Where? _____

Who Does The Disposing Of: Company etc.: _____

_____

What Kind Of Oils Are Used?_____

_____

Where Are The Oils Stored?_____

_____

Approximently How Much Oil Per Week Is Used?_____gal.

Approximently How Much Is Lost?_____gal.

Where Is It Lost?_____

Do You Recycle The Used Oil?_____

Who Does The Disposing Of?_____

How Often?_____

A-1c

Where Is It Disposed Of? _____

_____

Comments: _____

_____

_____

Recommended Action: _____

_____

_____

A-1d

CLARKSVILLE LIGHT AND WATER COMMISSION

INSTRUCTIONS FOR INDUSTRIAL WASTE QUESTIONNAIRE

General Instructions

These instructions are designed to assist you in filling out the Clarksville Light and Water Commission (CL&W) "Industrial Waste Questionnaire." Examples have been provided which should answer most questions concerning the information required. If, however, you have a question about a particular item, please call Pam Crow of our office at (501) 754-7929 and she will be happy to assist you.

Please make certain all blanks are completed which are applicable to your facility. You may request that certain information be kept confidential, and this confidential information may be included on a separate sheet, if desired. Clarksville Light and Water will, however, reserve the right to make a determination of what information can be kept confidential.

If additional space is required to provide complete information for a particular item, please attach additional sheets and write "continued on additional sheet" in the appropriate blank.

Appendix A lists those chemical compounds on the list of 65 toxic pollutants which have commonly used synonyms.

This questionnaire should be completed and returned to CL&W within 30 days after receipt. Thank you for your cooperation.

Part I. General Information

North American Industrial Classification Code (NAICS): Use the NAICS code(s) which best describe the various products or services provided. If you are not sure of your SIC code, you may obtain it from the local Employment Security Division office at 1-800-482-9291.

Company Name: Use the name which is used for official transactions or as appears on company stationery.

Mailing Address: Should be the address where all correspondence pertaining to the questionnaire or other pretreatment correspondence should be sent.

Address of Premises: Should be the address of the plant or facility for which the questionnaire is being submitted. Each plant operated by your company, if at a different address, may require a separate questionnaire.

Name and Title or Signing Official: Shall be a representative of the company with the authority to sign on behalf of the company for the particular production facility and certify the accuracy of information provided on official documents. A plant manager may be assigned such authority.

Contact Official: Often a person within the company, such as the plant engineer, is assigned the responsibility of dealing with matters concerning waste disposal. The name, title, business address, and business phone number of this alternate person should be provided.

The signing official should sign and date the completed questionnaire after reviewing its contents.

Part II. Future Water Usage and Wastewater Flows

Based on the current rate of water usage indicated on this questionnaire, give your best estimate of your plant's future water consumption and how you anticipate the percentage of water returned to the sewer system will change.

Part III. Establishment's Operational Characteristics

List the principal products produced at your facility or the principal services you perform.

Describe the primary operations which will convey a general idea of the type of manufacturing or service activities which take place at the premise address. For example, if you manufacture "dairy products," your primary operations might be:

a. receiving milk; b. bottling milk; c. condensing milk;
d. ice cream manufacturing; e. dry milk manufacturing;
f. cheese making; g. butter making.

Is there any wastewater generated within your establishment other than normal domestic sewage? If so, complete the remainder of the questionnaire. If not, you may skip the remainder of the questionnaire.

List each source of wastewater describing the process which produces the wastewater and the general type of pollutants in each stream. For example, if you are engaged in metals finishing production, you might list the following:

Plating Small Component Parts: producing cyanide, copper, cadmium, zinc, nickel, chromium, silver, and waste with pH less than 5.

Painting Line: producing caustics, zinc, chrome, lead, oils and greases, and volatile hydrocarbons.

Type of Production Process: A manufacturing process may involve any number of identifiable activities or process steps. Anything conducted in one operation or lot would be a batch process, whereas a continuous process is normally considered an operation that proceeds step-by-step without interruption. To compute the average number of batch operations per 24-hour day, take the total number of batches made during a typical production month and divide by the average number of work days per month.

Seasonal Production: During summer months, a plant may make antifreeze for sale during fall and winter. During winter months, the same plant could conceivably manufacture charcoal lighter fluid. Such operations would be considered seasonal. For those plants with seasonal variations in manufacturing processes, itemize the products and months of peak production for those products.

Production Shifts: Consider each shift on the basis of normal starting time with three shifts possible per 24-hour day. Only the periods of production or process operation including cleanup procedures are to be considered as shift work. The average number of employees per shift should include those office workers, executives and watchmen whose hours generally coincide with the times of production shifts.

Part IV. Water Sources, Consumption and Discharges

Water Sources: List the sources (CL&W water system, private well, etc.) and the average daily consumption from these sources during a typical workday.

Water Consumption: Water usage in industry varies depending on the type of manufacturing activity, age of the plant, process equipment utilized and other variable characteristics. A listing of the categories and total water volumes used is an aid in evaluating wastewater disposal problems. In some instances the volume of water used for a particular category will be metered. In other cases, a calculated estimate of the water used will be necessary.

a. Record the average volume of water used (gallons per day) for make-up in coolers, refrigeration and air conditioning equipment, cooling towers, and other similar systems.

b. Record the average water volume used for boiler make-up (i.e., feed water) and other heating systems.

c. Record the average daily water consumption for all production processes at your plant.

d. Record the water used for domestic type activities at your plant. Such use would include water for showers, toilets, cafeteria and drinking fountains.

e. Record the average water volume which is contained in the manufactured product.

f. Record the volume of water used for activities other than the listed categories and identify the use. Examples would be washdown water and irrigation water.

g. Total the average water volumes for items a. through f.

Water Discharged: Water consumed by an industrial plant must be removed from the plant via some means, i.e., the water in and water out must be in balance. Much of the raw water, after being used for processing, cleaning, cooling and other purposes, is discharged to a sewer. Some water is removed from the premise by other means such as evaporation, or shipped out in product. The quantities removed by such other means can often be determined from plant operational logs. Sometimes actual measurements using various types of metering devices are necessary. Average daily water consumption figures can be used to check overall discharge quantity.

In reporting the total average daily water volume discharged to each outlet, be sure to include in the average any slug discharges from batch or periodic cleanup and other such fluctuating discharges. Some sewer discharges may go directly to the municipal sewer system while other discharges may end up in a ditch or natural watercourse and require an NPDES permit from the U. S. Environmental Protection Agency. Cooling water overflow may be an example of the latter, since it could ultimately be discharged from a building into a natural watercourse.

Some industries dispose of wastewaters via other means such as waste haulers or subsurface injection. The volume of such discharges should be included. Storm water should not be included in any reported discharge volume.

a. Record the measured or estimated average gallons per day of all wastewaters that flow from the premise and enter a public sewer whether treated or untreated, process or sanitary, boiler or cooling water. Flow measurements or calculated estimates should extend over a sufficient period of time to ensure that typical or representative flows are reported.

b. Record the measured or estimated average gallons per day of all wastewaters whether treated or untreated that flow from the premise and enter a watercourse, storm drain or groundwater.

Flow measurements or estimates should extend over a sufficient period of time to ensure that typical or representative operation is reported. Any irrigation or lawn watering should be included on this line.

c. Record the estimated average gallons per day of all wastewaters that are removed from this premise by waste haulers in your employ or contracted.

d. Record the estimated average gallons per day of water lost by evaporation during processing, heating or cooling.

e. Record the estimated average gallons per day of water contained in your products.

f. Total the average discharge for items a. through e.

Type of Discharge: Industries in which the wastewater flows into the sewer system in a more or less continuous flow should be indicated as being "steady." For industries which discharge their wastewater either intermittently or periodically, the type of system should be described. If the wastewater is held in a holding tank or wetwell and then discharged, the capacity of the tank or wetwell should be given, along with the pumping rate or calculated flow rate.

Part V. Wastewater Quality and Pretreatment

The list of substances in this item has been prepared by the U. S. Environmental Protection Agency to comply with the requirements of the 1976 Consent Decree in the case of NRDC vs. Train, 8 ERC 2120 (D.D.C. 1976). Some of the organic compounds in this list are known by other names. Appendix A of these instructions lists in alphabetical order those compounds which have synonymous names.

To obtain the required information for this section, a review of substances or materials used in or generated by our manufacturing or service activity is necessary. Many of the substances are ingredients of materials in common use. A careful review of labels may be necessary to determine their presence or absence. When using proprietary products for cleaning or other purposes, it may be necessary to consult suppliers for assistance in determining whether or not a priority pollutant is present.

In this item, we are asking that you only indicate for each chemical compound if it is suspected present or known present. You do not have to perform a laboratory analysis to obtain this information. However, any recent data concerning wastewater analyses performed on discharges from your facility should be attached. If it is subsequently determined that your establishment

must be issued a permit under CL&W's industrial pretreatment program, you will then be required to perform laboratory analysis of your wastewater.

It should be indicated if any form of wastewater pretreatment is practiced at this facility. The information provided concerning wastewater pretreatment should include any equipment or process used to remove or reduce solids, grease, dissolved or other materials prior to discharge to the sewer system. Examples are: oil/grease interceptors, filters, settling tanks.

Facilities with substantial quantities of oil or hazardous substances stored on the premise should have a spill contingency plan and spill control facilities to prevent such substances from causing environmental damage if spilled. You should determine the potentially hazardous substances that could be spilled at your facility and evaluate the need for such planning and control systems. Other nonhazardous substances such as food processing wastes might be washed into the sewer system as part of cleanup operations. If this is the case, please indicate.

If your industry includes as a part of its operations processes listed in Table 1 attached, then your industry is subject to federal pretreatment standards. If so, please complete the remainder of the questionnaire. If not, skip the remainder of the questionnaire.

TABLE 1

APPENDIX C OF 40 CFR 403 (51 FR 20426 Published June 4, 1986)

INDUSTRIAL CATEGORIES SUBJECT TO NATIONAL CATEGORICAL PRETREATMENT STANDARDS

Aluminum Forming
Asbestos Manufacturing
Battery Manufacturing
Builder's Paper
Carbon Black
Cement Manufacturing
Coil Coating
Copper Forming
Dairy Products Processing
Electrical & Electronic Components
Electroplating
Feedlots
Ferralloy Manufacturing
Fertilizer Manufacturing
Fruits and Vegetables Processing Manufacturing
Glass Manufacturing
Grain Mills Manufacturing
Ink Formulating
Inorganic Chemicals
Iron and Steel Manufacturing
Leather Tanning and Finishing
Meat Processing
Metal Finishing
Metal Molding and Casting
Nonferrous Metals Forming
Nonferrous Metals Manufacturing
Paint Formulating
Paving and Roofing (Tars & Asphalt)
Pesticides
Petroleum Refining
Pharmaceuticals
Phosphate Manufacturing
Porcelain Enameling
Pulp and Paper
Rubber Processing
Seafood Processing
Soaps and Detergents Manufacturing
Steam Electric
Sugar Processing
Timber Products Manufacturing
Plastics Molding and Forming
Textile Mills

CHEMICAL COMPOUND	SYNONYM	CHEMICAL COMPOUND	SYNONYM
enzo(a)anthracene	1,2-benzanthracene	di-n-octyl phthalate	di(2-ethylhexyl)phthalate
	2,3-benzphenanthrene	4,7-dinitro-2-methylphenol	4,6-dinitro-ortho-cresol
enzo(a)pyrene	3,4-benzopyrene	1,2-diphenylhydrazine	hydrazobenzene
enzo(g,h,i)perylene	1,12-benzoperylene	endosulfan I	a-endosulfan-alpha
enzo(k)fluoranthene	11,12-benzofluoranthene	endosulfan II	b-endosulfan-beta
BHC	lindane	fluorene	(alpha)-diphenylene methane
s(2-chloroethyl)ether	2,2'-dichloroethyl ether	hexachlorobenzene	perchlorobenzene
s(2-chloroethoxy)methane	2,2'-dichloroethoxy methane	hexachlorocyclopentadiene	perchlorocyclopentadiene
s(2-chloroisopropyl)ether	2,2'-dichloroisopropyl ether	hexachloroethane	perchloroethane
s(chloromethyl)ether	(sym)dichloromethyl ether	indeno(1,3,3-cd)pyrene	2,3-ortho-phenylene pyrene
s(2-ethylhexyl)phthalate	2,2'-diethylhexyl phthalate	isophorone	3,5,5-trimethyl 1-2-cyclohexen-1-one
omodichloromethane	dichlorobromomethane	methylene chloride	dichloromethane
omoform	tribromomethane	2-nitrophenol	para-nitrophenol
omomethane	methyl bromide	4-nitrophenol	ortho-nitrophenol
rbon tetrachloride	tetrachloromethane	N-nitrosodimethylamine	dimethyl-nitrosoamine
chloro-3-methylphenol	para-chloro-meta-cresol	N-nitrosodipropylamine	N-nitroso-di-n-propylamine
loroethane	ethylchloride	N-nitrosodiphenylamine	diphenyl-nitrosoamine
loroform	trichloromethane	PCB-1016	Arochlor-1016
loromethane	methyl chloride	PCB-1221	Arochlor-1221
chlorophenol	para-chlorophenol	PCB-1232	Arochlor-1232
rysene	1,2-benzphenanthrene	PCB-1242	Arochlor-1242
'-DDD	dichlorodiphenyldichloroethane	PCB-1248	Arochlor-1248
	p,p'-TDE	PCB-1254	Arochlor-1254
	tetrachlorodiphenylethane	PCB-1260	Arochlor-1260
'-DDE	dichlorodiphenyldichloroethylene	2,3,7,8-tetrachlorodibenzo-p-dioxin	
	p,p'-DDX		TCDD
'-DDT	dichlorodiphenyltrichloroethane	1,1,2,2-tetrachloroethane	acetylene tetrachloride
enzo(a,h)anthracene	1,2,5,6-dibenzanthracene	tetrachloroethene	perchloroethylene
romochloromethane	chlorodibromomethane		tetrachloroethylene
-dichlorobenzene	ortho-dichlorobenzene	toluene	methylbenzene
-dichlorobenzene	meta-dichlorobenzene		toluol
-dichlorobenzene	para-dichlorobenzene	1,1,1-trichloroethane	methyl chloroform
hlorodifluoromethane	difluorodichloromethane	1,1,2-trichloroethane	vinyl trichloride
	fluorocarbon-12	trichloroethene	trichloroethylene
-dichloroethane	ethylidene chloride	trichlorofluoromethane	fluorocarbon-11
-dichloroethane	ethylene chloride		fluorotrichloromethane
	ethylene dichloride	vinyl chloride	chloroethene
-dichloroethene	1,1-dichloroethylene		chloroethylene
ans)-1,2-dichloroethene	acetylene dichloride		
	1,2(trans)-dichloroethylene		
-dichloropropane	propylene dichloride		
s & trans)1,3-dichloropropene	(cis & trans)1,3-dichloropropylene		
thyl phthalate	ethyl phthalate		
-dimethylphenol	2,4-xylenol		

CLARKSVILLE LIGHT AND WATER COMMISSION

CLARKSVILLE, ARKANSAS

NON-RESIDENTIAL WASTEWATER USER SURVEY

I. GENERAL INFORMATION

Standard Industrial Classification Code (SIC) _____

_____

Company Name _____

Mailing Address _____

Address of Premises _____

Name and Title of Signing Official _____

Contact Official:

Name _____

Title _____

Address _____

Phone _____

This is to certify that the information contained in this questionnaire is familiar to me and to the best of my knowledge and belief, such information is true, complete and accurate.

_____

Date Signature of Official

II. FUTURE WATER USAGE AND WASTEWATER FLOWS

Our water records show your average water usage to be about _____ gallons per month from _____ through _____. What is your best

A-1K

estimate of your establishment's water usage through the year 2015?

☐ Unchanged

_____ Gal/Month in 2000

_____ Gal/Month in 2005

_____ Gal/Month in 2010

_____ Gal/Month in 2015

The wastewater discharged to Clarksville Light and Water's wastewater collection system will most likely:

☐ Stay about the same.

☐ Change as follows: _____

_____

_____

III. ESTABLISHMENT'S OPERATIONAL CHARACTERISTICS

Principal Product or Service (North American Industrial Classification Manual, if appropriate): _____

_____

Brief description of manufacturing or service activity on premises: _____

_____

_____

Is there <u>any</u> wastewater generated within your establishment other than normal domestic sewage from toilet facilities, drinking fountains and lavatories?

☐ Yes ☐ No

(NOTE: IF YOU DO NOT GENERATE <u>ANY</u> WASTEWATER WITHIN YOUR ESTABLISHMENT OTHER THAN NORMAL DOMESTIC SEWAGE, YOU MAY SKIP THE REMAINDER OF THE QUESTIONNAIRE.)

If you generate wastewater other than normal domestic sewage, list each source of wastewater describing the process which produces the wastewater and the general type of pollutants (detergent, grease, wood shavings, caustic cleaning agents, food particles, etc.) in each wastewater stream. (Use extra sheets of paper if necessary to provide complete information.)

Type of production Processes: _____ Batch _____ Continuous

If batch, average number of batches per 24 hours? _____

Do you have a scheduled shutdown (vacation, etc.)? _____

When? _____

Is production seasonal? _____

If yes, explain, indicating month(s) of peak production: _____

Average number of employees per shift: _____ 1st; _____ 2nd; _____ 3rd

Shift start times: _____ 1st; _____ 2nd; _____ 3rd

Shifts normally worked each day:

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
1st							
2nd							
3rd							

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IV. WATER SOURCES, CONSUMPTION AND DISCHARGES

Water Sources:

Source	Quantity
Clarksville City Light and Water System	_____ gallons per day
Private Wells	_____ gallons per day
Other	_____ gallons per day
Total	_____ gallons per day

Describe any raw water treatment processes in use: _____

_____

_____

_____

List Water Consumption in Plant:

Cooling Water	_____ gallons per day
Boiler Feed	_____ gallons per day
Process Water	_____ gallons per day
Sanitary Sewer System	_____ gallons per day
Contained in Product	_____ gallons per day
Other (irrigation, etc.)	_____ gallons per day
Total	_____ gallons per day

List Average Volume of water Discharged to:

Clarksville CL&W Wastewater System	_____ gallons per day
Natural Outlet (stream or storm sewer)	_____ gallons per day
Waste Hauler	_____ gallons per day
Evaporation	_____ gallons per day
Other (explain)	_____ gallons per day
Total	_____ gallons per day

Is discharge to sewer: _____ Intermittent _____ Steady

If intermittent, describe (holding tanks, sump pumps, lift stations, flow rates, etc.)

Does your establishment have a current National Pollutant Discharge Elimination System Permit?

_____ Yes _____ No

If so, what is the identifying number? _____

V. WASTEWATER QUALITY AND PRETREATMENT

Are any of the toxic pollutants listed in the table on page 7 known or suspected of being used at this facility either in the manufacturing of the product or as a by-product of your processes which may enter the sewage collection system? If so, please indicate by a check mark on the table (page 7). Refer to Appendix A for a list of synonyms for some of these chemical compounds.

Describe any wastewater equipment or processes in use:

VI. POLLUTION PREVENTION PROJECTS

Describe any Pollution Prevention Project activities which are either planned or which have been implemented:

VII. BEST MANAGEMENT PRACTICES

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

A-1p

TABLE

65 Toxic Pollutants Listed in Appendix B of 40 CFR 403
(51 FR 20426 Published June 4, 1986)

____ Acenaphthene
____ Acrolein
____ Acrylonitrile
____ Aldrin/Dieldrin
____ Antimony and compounds
____ Arsenic and compounds
____ Asbestos
____ Benzene
____ Benzidine
____ Beryllium and compounds
____ Cadmium and compounds
____ Carbon Tetrachloride
____ Chlordane (technical mixture and metabolites)
____ Chlorinated benzenes (other than dichlorobenzenes)
____ Chlorinated ethanes (including 1,2-dichloroethane, 1,1,1-trichloraethane, and hexachloroethane)
____ Chloroalkyl ethers (chloroethyl and mixed ethers)
____ Chlorinated napthalene
____ Chlorinated phenols (other than those listed elsewhere; includes trichlorophenols and chlorinated cresols)
____ Chloroform
____ 2-Chlorophenol
____ Chromium and compounds
____ Copper and compounds
____ Cyanides
____ DDT and metabolites
____ Dichlorobenzenes (1,2-, 1,3- and 1,4-dichlorobenzenes)
____ Dichlorobenzidine
____ Dichloroethylenes (1,1- and 1,2-dichloroethylene)
____ 2,4-dichlorophenol
____ Dichloropropane and dichloropropene
____ 2,4-dimethylphenol
____ Dinitrotoluene
____ Diphenylhydrazine
____ Endosulfan and metabolites
____ Endrin and metabolites
____ Ethylbenzene
____ Fluoranthene
____ Haloethers (other than those listed elsewhere; includes chlorophenylphenyl ethers, bromophenylphenyl ether, bis-(dichloroisopropyl) ether, bis-(chloroethoxy) methane and polychlorinated diphenyl ethers)
____ Halomethanes (other than those listed elsewhere; includes methylene chloride, methylchloride, methylbromide, bromoform, dichlorobromomethane)
____ Hepthachlor and metabolites
____ Hexachlorobutadiene
____ Hexachlorocyclohexane
____ Hexachlorocyclopentadiene
____ Isophorone
____ Lead and compounds
____ Mercury and compounds
____ Napthalene
____ Nickel and compounds
____ Nitrophenols (including 2,4-dinitrophenol; dinitrocresol)
____ Nitrosamines
____ Pentachlorophenol
____ Phenol
____ Phtalate esters
____ Polychlorinated biphenyls (PCBs)
____ Polynuclear aromatic hydrocarbons (including benzanthracenes, benzopyrenes, benzofluoranthene, chrysenes, dibenzanthracenes, and indenopyrenes)
____ Selenium and compounds
____ Silver and compounds
____ 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)
____ Tetrachloroethylene
____ Thallium and compounds
____ Toluene
____ Toxaphene
____ Trichloroethylene
____ Vinyl chloride
____ Zinc and compounds

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Provide below a sketch of your sewer drain system showing: process sources floor drains, grease traps, settling basins, screens, other applicable treatment components, connection to Clarksville Light and Water sewer, and access manhole. (Use extra sheets of paper if necessary to provide complete information.)

Is there a Spill Prevention Control Plan in effect for this plant?

_____ Yes _____ No

How are spills (chemicals, food wastes, etc.) disposed of?

_____ Washed into sewer _____ Hauled off premises

_____ Other (describe): _____

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Is this plant subject to an existing Federal Pretreatment Standard? (Refer to Table 1 for a list of Industries Subject to Federal Pretreatment Standards.)

_____ Yes _____ No

If so, are Pretreatment Standards being met on a consistent basis?

Are additional pretreatment facilities and/or operation and maintenance required to meet applicable Pretreatment Standards?

If additional pretreatment and/or operation and maintenance are required, list the schedule under which they will be provided:

Attachment A-2

Copy

CLARKSVILLE LIGHT & WATER CO. AT YOUR SERVICE

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

January 14, 2004

Travis Renfroe
Environmental Manager
Greenville Tube
P.O. Box 550
Montgomery & Lucas
Clarksville AR 72830
NAICS 331491
SIC 3356

Dear Travis,

Here is the new permit for Greenville Tube. It should be replaced by the old one. Please note these changes: report monthly flow, and TTO's and TCE will be tested for as required by POTW. Maximum daily flow has been changed to 10,000 gallons per day.

Thank You,
Pam Crow
Preatment Coordinator

Pam Crow

City of Clarksville, Arkansas
Clarksville Light and Water Commission

Permit No. 06

INDUSTRIAL USER PERMIT

In accordance with the provisions of Municipal Code 10.04

Travis Renfroe
Environmental Manager
Greenville Tube
P.O. Box 550
Montgomery & Lucas
Clarksville Ar 72830
NAICS 331491
SIC 3356

Is hereby authorized to discharge industrial wastewater from the above-identified facility into the City of Clarksville, Clarksville Light & Water sewer system in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit.

All discharges authorized herein shall be consistent with terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

This permit shall become effective on Feb 1 2004and shall expire at midnight on Jan. 31 2009.

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after this expiration date an application must be filed for reissuance of this permit in accordance with the requirements of Municipal Code 10.04.09 (7), a minimum of 60 days prior to the expiration date.

By: _____
Hugh W. Harrison – General Manager

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr.Travis Renfroe
Environmental Manager
Greenville Tube
P.O. Box 550
Montgomery & Lucas
Clarksville AR 72830
NAICS 331491
SIC 3356

Re: Issuance of Industrial User Permit to Greenville Tube by the Clarksville Light and Water Company.

Permit No.06

Your application for issuance of a Discharge Permit has been reviewed and processed in accordance with Municipal Code 10.04.

The enclosed issued permit 06 covers the wastewater discharged from the facility located at Montgomery & Lucas into the City of Clarksville, and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit.

If you wish to appeal or challenge any effluent limitations, pretreatment requirements, or conditions imposed in this permit, a petition shall be filed for reissuance of this permit a minimum of 90 days prior to the expiration date.

By: _____
Hugh W. Harrison-General Manager

Issued this 15th day of JAN., 2005

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PERMIT REQUIREMENTS
CONTINOUS

SECTION A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

PROCESS WASTEWATER FLOWS;

Maximum Daily Flow 10,000 GPD

POLLUTANT DISCHARGE PARAMETERS: As a National Categorical Industry subject to 40 CFR 433, Metals Finishing, discharging process wastewater to the Clarksville Wastewater Collection System, the following pollutants shall be monitored and reported monthly. Composite samples will be taken from the rinse tank.

Report Monthly Flow 30 Day Average One Max

Pollutant Parameter	30 Day Average	Type Sample
Cadmium, mg/1	0.26* ***	24 Hr. Comp.
Chromium (total), mg/1	1.71*	24 Hr. Comp.
Copper, mg/1	2.07*	24 Hr. Comp.
Lead, mg/1	0.43*	24 Hr. Comp.
Nickel, mg/1	2.38*	24 Hr. Comp.
Silver, mg/1	0.24* ***	24 Hr. Comp.
Zinc, mg/1	1.48*	24 Hr. Comp.
PH S.U.	6.0-9.0	GRAB
Oil & Grease, mg/1	100	GRAB
Heat (emp)	150F (65C)**	
Cyanide (total), mg/1	0.65*	Twice Per Year
TTO, mg/1	2.13*	As Required By POTW
TCE	Report	As Required By POTW

*Process wastewater per 40 CFR 433.15, Pretreatment Standards for Exiting Source.

**Municipal Code 10.04.061 (E)

***Twice per year, unless there is a detection then it will be three times consecutively.

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[illegible] 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;

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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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- 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 international 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.

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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 disposed 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, ciders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or any other solids or

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

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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 of 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.

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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;

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.

A-2m

A. All permit applications shall be signed

1. For a corporation: By a principal executive officer of at least the level of vice-president;
2. For a partnership or sole proprietorship: By a general partner or the proprietor, respectively;

B. All other correspondence, reports and self-monitoring reports shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

1. The authorization is made in writing by a person described above.
2. The authorization specified either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and

C. Certification. Any person signing a document under this section shall make the following certification:

"I certify under the penalty of law that I am familiar with the information contained in this report and its attachments and that to the best of my knowledge and belief such information is true, complete, and accurate."

_____ / _____

Name / Title Date

A-2N

SECTION F. PERMIT VIOLATIONS

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.

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.

Cathy Rocole

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

6-11-07
Date of Signature

CORPORATE ACKNOWLEDGMENT

STATE OF ARKANSAS)
COUNTY OF Johnson)

Before me, the undersigned authority, on this day personally appeared Cathy Rocole Of Greenville Tube, 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 11th day of June, 2007.

Marla J. Hartman
Notary Public in and
For Johnson County, Arkansas.

My commission Expires 10/20/07

MARLA J. HARTMAN
NOTARY PUBLIC - NOTARY SEAL
JOHNSON COUNTY, ARKANSAS
My Comm. Expires October 20, 2007

A-2p

Copy

Attachment A-3

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

March 26, 2007

Chris Allen
Plant Manager
Hanesbrand, Inc.
P.O. Box 669
Clarksville, AR 72830

RE: Oil & Grease Violation

Dear Mr. Allen,

On March 23, 2007, Eddie Shirley called to inform us of Hanesbrand most recent oil & grease violation of 210 mg/l on March 8, 2007.

Please send us a letter of corrective action.

If you have any questions please feel free to call us at 754-7929.

Thank you,

Gregg Rainey
Superintendent

Pam Crow
Pretreatment Coordinator

cc: Eddie Shirley
Pretreatment File

Copy

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

March 27, 2007

HANESbrandsINC

RETURN RECEIPT REQUESTED

Ms. Pam Crow
City of Clarksville
P. O. Box 1807
Clarksville, AR 72830

Dear Ms. Crow:

As reported verbally upon discovery by Eddie Shirley of the Company on March 23, 2007, there was an oil and grease excursions with a value of 210 mg/l on March 8 at Hanes Brands-Hosiery, Clarksville.

Environmental consultant Eric Wu of Delta and Don Brown of the Company meet with the city on March 22 to discuss recommendations for solving the problem with oil and grease at the Clarksville. Based on the wastewater assessment and treatability study, Delta recommends the following actions to the city and Hanesbrands:

1. Pretreatment operations optimization for a trail period of one Month:
    a. Increase aeration basin MLVSS concentration to the range 3000 to 4000 ppm
    b. Maintain Aeration basin DO in the range of 2 to 3 ppm
    c. Turn off aeration in one sludge digester for solid settling while maintaining aeration in the other sludge digester to observe and compare the difference in color, solid, O&G and BOD.
    d. If the trail results are successful, fully convert one of the sludge digester into a clarifier or installation of a new clarifier for sludge settling and return back to aeration basin, especially needed when flow rates increase in the future.

2. On-site pilot testing of flotation unit to gather on-site treatment performance data to confirm the treatment efficiency.

We will continue to work aggressively to solve this problem and greatly appreciate your help in the past and in future.

Please advise should you have any questions or need any additional information.

Rec 4/2/07

Respectfully,

Chris Allen
Plant Manager

HBI

A-36

Copy

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

April 2, 2007

HANES brands INC

RETURN RECEIPT REQUESTED

Ms. Pam Crow
City of Clarksville
P. O. Box 1807
Clarksville, AR 72830

Dear Ms. Crow:

As reported verbally upon discovery by Eddie Shirley of the Company on April 2, 2007, there was an TSS excursions with a value of 690 mg/l on March 8 at Hanes Brands-Hosiery, Clarksville.

Due the problem with oil and grease, we feel that this is a direct contributor to the higher suspended solid problem. As stated in previous letter dated 3/27/07, we are working with outside consultant to reduce the oil and grease and think that this will solve the suspended solids problem too.

We will continue to work aggressively to solve this problem and greatly appreciate your help in the past and in future.

Please advise should you have any questions or need any additional information.

Respectfully,

Chris Allen
Plant Manager

Cc: Eddie Shirley
Tommy Thompson
Clarksville POTW Correspondence

Rec 4/3/07

HBI

A-3c

Copy

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

April 11, 2007

Chris Allen
Plant Manager
Hanesbrand Inc.
P.O. Box 699
Clarksville AR. 72830

RE: TSS and Oil & Grease Violation

Dear Mr. Allen

On March 8, 2007 there was a TSS violation of 690 mg/l and on March 28, 2007 there was an oil & grease violation of 130 mg/l. We will need a letter of corrective action. We have received phone calls from Eddie on these violations.
Thank you for your time and cooperation on this matter.

Respectfully

Gregg Rainey
Superintendent

Pam Crow
Pretreatment Coordinator

Pam Crow

A-3d

Copy

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

May 1, 2007

HANESbrandsINC

RETURN RECEIPT REQUESTED

Ms. Pam Crow
City of Clarksville
P. O. Box 1807
Clarksville, AR 72830

Dear Ms. Crow:

As reported verbally upon discovery by Eddie Shirley of the Company on April 27, 2007, there was an oil and grease excursions with a value of 140 mg/l on April 12 and 110 mg/l on April 19 at Hanes Brands-Hosiery, Clarksville.

A conference call is set for May 1, 2007 to discuss the next step which looks like it will be an On-site pilot testing of flotation unit to gather on-site treatment performance data to confirm the treatment efficiency.

We will continue to work aggressively to solve this problem and greatly appreciate your help in the past and in future.

Please advise should you have any questions or need any additional information.

Respectfully,

Chris Allen
Plant Manager

Cc: Eddie Shirley
Tommy Thompson
Clarksville POTW Correspondence

Rec
5/3/07
P.C.

HBI

A-3e

Copy

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

May 9, 2007

Chris Allen
Plant Manager
Hanesbrand Inc.
P.O. Box 669
Clarksville AR 72830

RE: Oil & Grease Violations
April 12, 2007
April 19, 2007

Dear Mr. Allen

In reference to the above oil & grease violations, we did receive a phone call and letter. In the letter it was stated that May 1, 2007, there would be a conference call to discuss the next step. We would greatly appreciate it if you could let us know what this is when the final decision is made.

Thank you for your time and cooperation on this matter.

Sincerely,

Gregg Rainey
Superintendent

Pam Crow
Pretreatment Coordinator

cc: Eddie Shirley
Pretreatment File

A-3f

SARA LEE 2006

	Self-Monitoring								Limits								Violations	
	C-BOD		TSS						C-BOD	TSS						MGD		
DATE	mg/l	lbs/day	mg/l	lbs/day	pH	Temp	Oil&Grease	Flow	mg/l	lbs/day	mg/l	lbs/day	pH	Temp	Oil&Grease	Flow	Yes	No
1/12/06	950	356.535	130	48.789	6.6	43.2	210	0.045	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
1/18/06	1600	600.48	89	33.4017	7.2	49.3	230	0.045	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
2/9/06	1000	266.88	88	23.48544	6	42.1	180	0.03200	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
2/16/06	1200	470.376	130	50.9574	6	46.1	220	0.04700	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
2/28/06		0		0			130		2700	1350	522	261	6-9 units	150*F	100	0.09	X	
3/9/06	790	342.6072	200	86.736	6	42.1	190	0.05200	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
3/23/06	810	310.7484	130	49.8732	6.3	40.8	220	0.04600	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
3/24/06		0		0			120		2700	1350	522	261	6-9 units	150*F	100	0.09	X	
4/11/06	570	90.3222	76	12.04296	6.4	44.6	76	0.01900	2700	1350	522	261	6-9 units	150*F	100	0.09		X
4/21/06	670	217.9242	120	39.0312	7.2	46.6	26	0.03900	2700	1350	522	261	6-9 units	150*F	100	0.09		X
4/25/06		0		0			39		2700	1350	522	261	6-9 units	150*F	100	0.09		X
4/26/06		0		0			120		2700	1350	522	261	6-9 units	150*F	100	0.09	X	
5/3/06	790	197.658	51	12.7602	7	45.6	160	0.03000	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
5/17/06	510	123.3486	150	36.279	7	45.5	140	0.02900	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
5/24/06		0		0			120		2700	1350	522	261	6-9 units	150*F	100	0.09	X	
6/7/06	880	264.2112	260	78.0624	6.85	28.8	83	0.03600	2700	1350	522	261	6-9 units	150*F	100	0.09		X
6/12/06		0		0			120		2700	1350	522	261	6-9 units	150*F	100	0.09	X	
6/14/06		0		0			150		2700	1350	522	261	6-9 units	150*F	100	0.09	X	
6/22/06	862	122.21436	180	25.5204	6.8	32.1	170	0.01700	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
7/20/06	450	90.072	140	28.0224	7.2	42.8	54	0.02400	2700	1350	522	261	6-9 units	150*F	100	0.09		X
7.26/06	500	10.008	180	3.60288	7.7	44.2	98	0.00240	2700	1350	522	261	6-9 units	150*F	100	0.09		X
8/9/06	720	234.1872	58	18.86508	7.3	46	120	0.03900	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
8/24/06	760	291.5664	58	22.25112	7.1	47.5	170	0.04600	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
8/31/06		0		0			240		2700	1350	522	261	6-9 units	150*F	100	0.09	X	
9/7/06	940	321.4236	210	71.8074	7.3	52.7	260	0.04100	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
9/21/06	1100	330.264	190	57.0456	7.2	46	130	0.03600	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
9/27/06		0		0			170		2700	1350	522	261	6-9 units	150*F	100	0.09	X	
10/5/06	430	157.7928	130	47.7048	6.9	45.7	160	0.04400	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
10/19/06	1000	400.32	140	56.0448	6.6	42.7	170	0.04800	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
11/2/06	1200	510.408	620	263.7108	6.6	44.1	240	0.05100	2700	1350	522	261	6-9 units	150*F	100	0.09	XX	
11/16/06	700	251.034	130	46.6206	6.6	44.6	340	0.04300	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
11/30/06		0		0			150		2700	1350	522	261	6-9 units	150*F	100	0.09	X	
12/7/06	700	297.738	810	344.5254	6.5	36.9	230	0.05100	2700	1350	522	261	6-9 units	150*F	100	0.09	XX	
12/21/06	2900	967.44	260	86.736	6.5	41.5	400	0.04000	2700	1350	522	261	6-9 units	150*F	100	0.09	XX	
		0		0					2700	1350	522	261	6-9 units	150*F	100	0.09		
TOTAL	18432	4640.8264	3460	698.53338	149.85	963.1	5636	0.8114										
AVERAGE	837.818	171.88246	157.273	25.8716067	6.81136	43.7773	165.76471	0.036882										
MIN	430	0	51	0	6	28.8	26	0.0024										
MAX	1600	600.48	620	86.736	7.7	52.7	400	0.052										

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A-38

SARA LEE 2005

	Self-Monitoring								Limits								Violations	
DATE	mg/l	C-BOD lbs/day	mg/l	TSS lbs/day	pH	Temp	Oil&Grease	Flow	mg/l	C-BOD lbs/day	TSS mg/l	lbs/day	pH	Temp	Oil&Grease	MGD Flow	Yes	No
1/6/05	430	182.8962	97	41.25798	6.8	43.7	47	0.051	2700	1350	522	261	6-9 units	150*F	100	0.09		X
1/21/05	570	275.7204	120	58.0464	6.9	46.1	62	0.058	2700	1350	522	261	6-9 units	150*F	100	0.09		X
2/3/05	700	216.006	56	17.28048	6.5	45	52	0.03700	2700	1350	522	261	6-9 units	150*F	100	0.09		X
2/17/05	410	143.6148	550	192.654	6.6	44.7	110	0.04200	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
3/4/05	490	167.5506	180	61.5492	6.1	46.2	60	0.04100	2700	1350	522	261	6-9 units	150*F	100	0.09		X
3/17/05	300	130.104	190	82.3992	6.4	48	280	0.05200	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
4/7/05	500	200.16	340	136.1088	6.4	47.9	130	0.04800	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
4/8/05		0		0			90		2700	1350	522	261	6-9 units	150*F	100	0.09		X
4/11/05		0		0			22		2700	1350	522	261	6-9 units	150*F	100	0.09		X
4/12/05		0		0			62		2700	1350	522	261	6-9 units	150*F	100	0.09		X
4/21/095	1000	433.68	340	147.4512	6.3	45	70	0.05200	2700	1350	522	261	6-9 units	150*F	100	0.09		X
5/5/05	380	136.2756	170	60.9654	6.4	47.7	100	0.04300	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
5/26/05	330	121.0968	81	29.72376	6.6	47.9	95	0.04400	2700	1350	522	261	6-9 units	150*F	100	0.09		X
6/9/05	710	284.2272	82	32.82624	6.4	47.5	44	0.04800	2700	1350	522	261	6-9 units	150*F	100	0.09		X
6/16/05	760	361.2888	120	57.0456	6.6	50.4	32	0.05700	2700	1350	522	261	6-9 units	150*F	100	0.09		X
7/14/05	770	250.4502	88	28.62288	6.4	49.6	78	0.03900	2700	1350	522	261	6-9 units	150*F	100	0.09		X
7/28/05	590	241.1094	69	28.19754	6.1	47.7	140	0.04900	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
8/17/05	330	162.3798	28	13.77768	6.8	50.7	220	0.05900	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
8/24/05	970	461.1186	78	37.07964	6.5	47	80	0.05700	2700	1350	522	261	6-9 units	150*F	100	0.09		X
9/8/05	420	192.654	90	41.283	6.7	47.4	140	0.05500	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
9/22/05	580	140.2788	77	18.62322	6.7	50.6	210	0.02900	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
10/6/05	75	21.267	63	17.86428	6.6	44.7	52	0.03400	2700	1350	522	261	6-9 units	150*F	100	0.09		X
10/20/05	930	488.6406	86	45.18612	7	44.8	52	0.06300	2700	1350	522	261	6-9 units	150*F	100	0.09		X
11/3/05	840	329.2632	77	30.18246	6.4	43.2	110	0.04700	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
11/17/05	740	364.1244	230	113.1738	6.7	45	110	0.05900	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
11/30/05		0		0			45		2700	1350	522	261	6-9 units	150*F	100	0.09		X
12/8/05	720	336.2688	340	158.7936	6.1	42.6	180	0.05600	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
12/22/05	960	408.3264	210	89.3214	6.8	40.3	190	0.05100	2700	1350	522	261	6-9 units	150*F	100	0.09	X	
		0		0					2700	1350	522	261	6-9 units	150*F	100	0.09		
		0		0					2700	1350	522	261	6-9 units	150*F	100	0.09		
TOTAL	14505	6048.5016	3762	1539.41388	156.8	1113.7	2863	1.171										
AVERAGE	604.375	201.61672	156.75	51.313796	6.53333	46.4042	102.25	0.048792										
MIN	75	0	28	0	6.1	40.3	22	0.029										
MAX	1000	488.6406	550	192.654	7	50.7	280	0.063										

Attachment A-4

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

May 23, 2007

MAY 30 2007

sw

~~AF~~ adequate response

Arkansas Dept. of Environmental Quality
8001 National DR
Little Rock, AR 72219-8913

RE: AR0022187; Clarksvilles' Enforcement Response Plan (ERP)

Dear Mr. Gilliam:

This letter is in response to your letter of April 27th to Gregg Rainey, our wastewater treatment superintendent.

You asked for the reasons as to why Clarksville Light & Water is not following its own ERP in further enforcing Hanesbrands' oil and grease exceedances. The short answer is that while their effluent was not in compliance, ours has been well within our limits with Hanesbrands paying for extra chemicals and any other additional costs that we have had in order to stay in compliance.

The long answer is they have acted quickly in seeking solutions since violations first started showing a pattern in 2005. Their corporate headquarters made decisions then that have changed the characteristics of the local effluent that will naturally take time to correct. The manufacturing process is a big ship to get turned around.

Hanesbrands has been responsive which is the purpose of further escalations of the ERP. It has been my ongoing decision to encourage compliance solutions rather than to force solutions since our effluent is good, they reimburse us our extra costs, and they are pursuing a permanent solution.

Significant events have been the:

(1) Pumping and cleaning of the pretreatment plant at their expense in Spring of 06';
(2) An onsite conference with 24 vendors representatives and staff from corporate headquarters, as well as local staff in July 06';
(3) Contract with Delta Environment Consultants of Charlotte, N.C. to arrive at a solution, see attached flow chart; and

(4) Finally, they have signed a consent order (also attached) based on the time table in the above schedule.

We believe we have the situation in hand and will keep you advised as milestone dates are reached.

Please let me know if further response on our part is required.

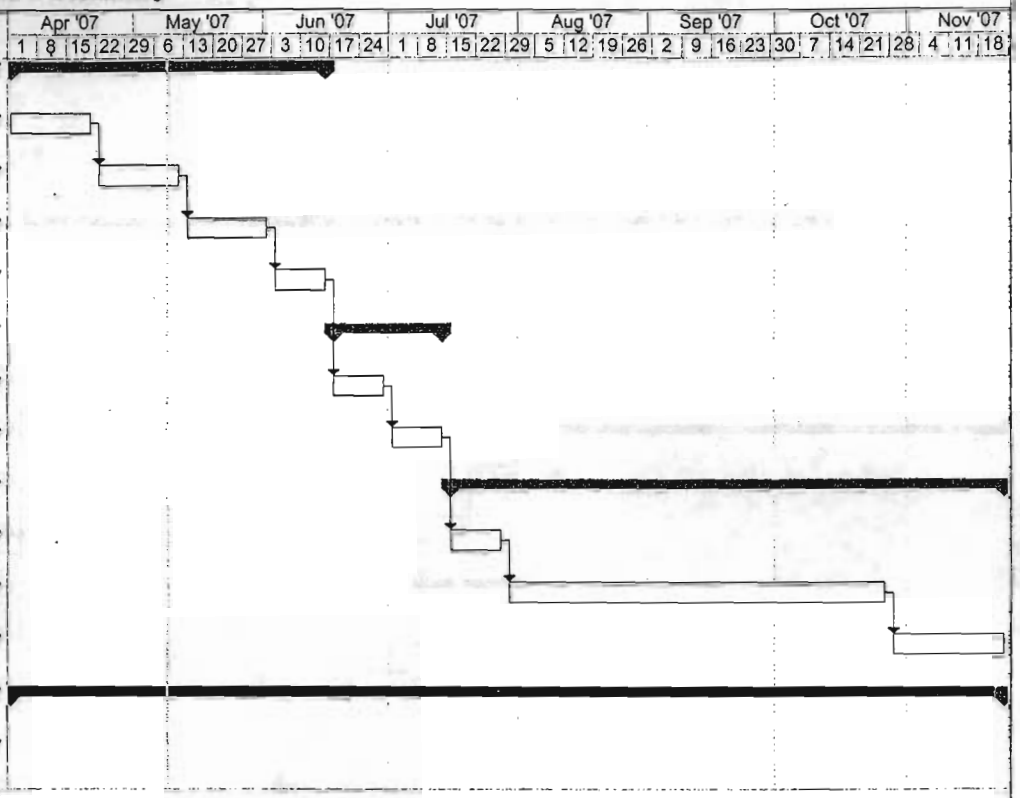
Sincerely,

Hugh W. Harrison
General Manager

CC: Gregg Rainey

Hanesbrands Inc., Clarksville, AR
Wastewater Pretreatment System Upgrade
Project Planning & Schedule
Gravity Clarifier or Acid Cracking

ID	Task Name	Duration	Start	Finish
1	**Task 1 - Pretreatment system process improvement**	**55 days**	**Mon 4/2/07**	**Fri 6/15/07**
2	1.1Trial at East basin with return sludge	3 wks	Mon 4/2/07	Fri 4/20/07
3	1.2 Increase East basin with more city sludge	3 wks	Mon 4/23/07	Fri 5/11/07
4	1.3 On-site bench testing for gravity clarifier and acid cracking	3 wks	Mon 5/14/07	Fri 6/1/07
5	1.4 Evaluate the treatment feasibility to make decision	2 wks	Mon 6/4/07	Fri 6/15/07
6	**Task 2 - Engineering design and specification**	**20 days**	**Mon 6/18/07**	**Fri 7/13/07**
7	2.1 Equipment sizing and specification	2 wks	Mon 6/18/07	Fri 6/29/07
8	2.2 Review and approval process	2 wks	Mon 7/2/07	Fri 7/13/07
9	**Task 3 - Procurement, Construction, & Startup**	**95 days**	**Mon 7/16/07**	**Fri 11/23/07**
10	3.1 Bid selection and procurement	2 wks	Mon 7/16/07	Fri 7/27/07
11	3.2 Equipment fabrication, delivery and construction	13 wks	Mon 7/30/07	Fri 10/26/07
12	3.3 System startup and performance testing	4 wks	Mon 10/29/07	Fri 11/23/07
13	**Project Schedule - Treatment system upgrade completion**	**170 days**	**Mon 4/2/07**	**Fri 11/23/07**
14	Total Project Time	34 wks	Mon 4/2/07	Fri 11/23/07



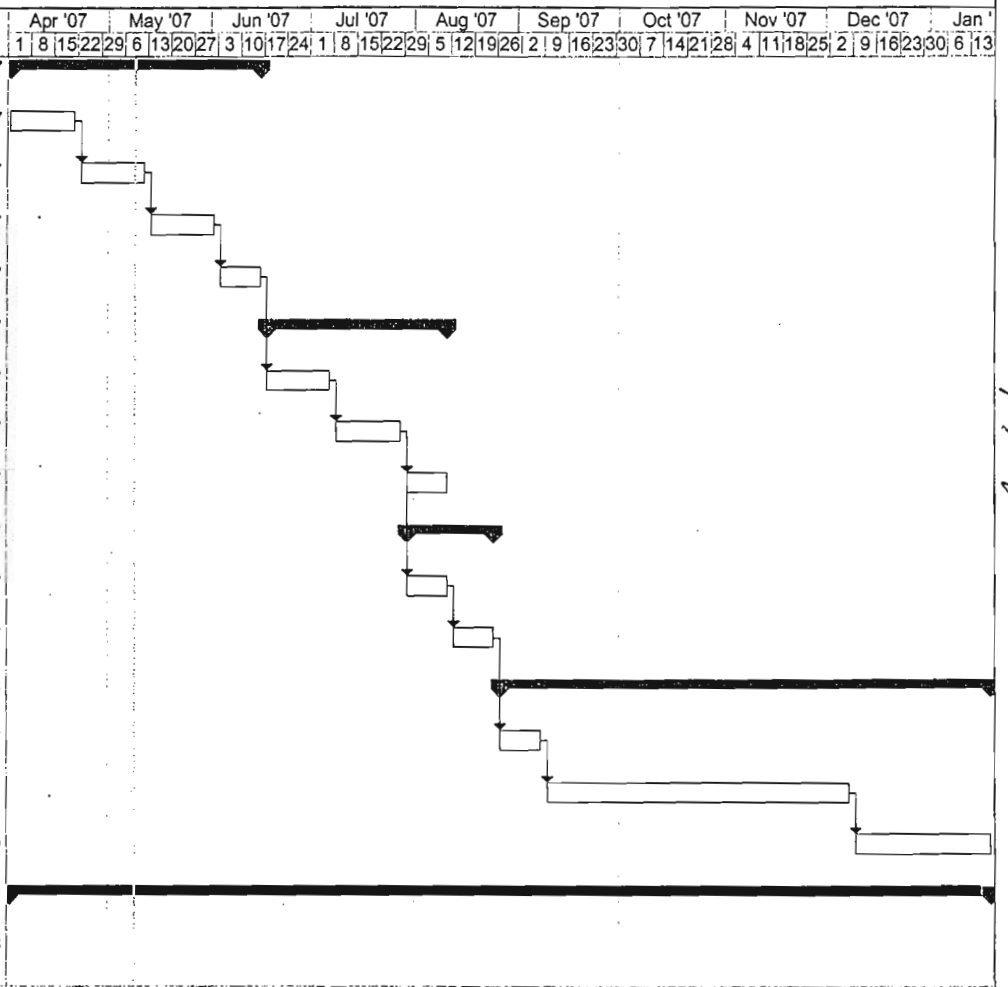
A-4c

Project: Hbl Clarksville WW Project Pl
Date: Wed 5/9/07

Task | Progress | Summary | External Tasks | Deadline
Split | Milestone | Project Summary | External Milestone

Hanesbrands Inc., Clarksville, AR
Wastewater Pretreatment System Upgrade
Project Planning & Schedule
Charged Air Floatation

ID	Task Name	Duration	Start	Finish
1	**Task 1 - Pretreatment system process improvement**	**55 days**	**Mon 4/2/07**	**Fri 6/15/07**
2	1.1Trial at East basin with return sludge	3 wks	Mon 4/2/07	Fri 4/20/07
3	1.2 Increase East basin with more city sludge	3 wks	Mon 4/23/07	Fri 5/11/07
4	1.3 On-site bench testing for gravity clarifier and acid cracking	3 wks	Mon 5/14/07	Fri 6/1/07
5	1.4 Evaluate the treatment feasibility to make decision	2 wks	Mon 6/4/07	Fri 6/15/07
6	**Task 2 - CAF pilot testing**	**40 days**	**Mon 6/18/07**	**Fri 8/10/07**
7	2.1 Pilot unit arrangement and mobilization	3 wks	Mon 6/18/07	Fri 7/6/07
8	2.2 Pilot program onsite testing	3 wks	Mon 7/9/07	Fri 7/27/07
9	2.3 Data analysis and Report development	2 wks	Mon 7/30/07	Fri 8/10/07
10	**Task 3 - Engineering design and specification**	**20 days**	**Mon 7/30/07**	**Fri 8/24/07**
11	3.1 Equipment sizing and specification	2 wks	Mon 7/30/07	Fri 8/10/07
12	3.2 Review and approval process	2 wks	Mon 8/13/07	Fri 8/24/07
13	**Task 4 - Procurement, Construction, & Startup**	**105 days**	**Mon 8/27/07**	**Fri 1/18/08**
14	4.1 Bid selection and procurement	2 wks	Mon 8/27/07	Fri 9/7/07
15	4.2 Equipment fabrication, delivery and construction	13 wks	Mon 9/10/07	Fri 12/7/07
16	4.3 System startup and performance testing (inc. Holidays)	6 wks	Mon 12/10/07	Fri 1/18/08
17	**Project Schedule - Treatment system upgrade completion**	**210 days**	**Mon 4/2/07**	**Fri 1/18/08**
18	Total Project Time	42 wks	Mon 4/2/07	Fri 1/18/08



Project: Hbl Clarksville WW Project Pl
Date: Wed 5/9/07

Task | Progress | Summary | External Tasks | Deadline
Split | Milestone | Project Summary | External Milestone

A-401

CONSENT ORDER

Issued By: Clarksville Light & Water Co.
Issued To: Hanesbrands Inc.
Duration: May 16, 2007 – November 16, 2007

Whereas, Hanesbrands Inc. has contracted with a consulting engineering firm to ascertain the most efficient method of treating oil and grease from its effluent; and
Whereas, assuming this feasibility study utilizing a biological treatment in combination will either a clarifier and/or acid cracking requires an additional six months to install and implement the proper treatment process; and
Whereas, Hanesbrands Inc. may, during various treatment trials, exceed its oil and grease limitation;

Now therefore it is mutually agreed by Clarksville Light & Water Co. and Hanesbrands Inc. that:
during the feasibility study, Hanesbrands 100 mg/l limitation for oil and grease will be suspended, and it will continue to be required to report the oil and grease concentrations as outlined in its discharge permit; and
all other parameters of its discharge permit number 02 remain in effect; and
Hanesbrands Inc. understands that should proper treatment not be achieved by October 31, 2007 it will be subject to further enforcement by Clarksville Light & Water Co. as stated in the Clarksville Pretreatment Ordinance.

As a condition of this Consent Order Hanesbrands Inc. will submit written progress reports on the following schedule:

June 29, 2007	Success or failure of the feasibility study
July 15, 2007	Trial completion and design specification
August 15, 2007	Procurement and construction
November 15, 2007	Startup and performance

Should the feasibility study utilizing biological treatment and a combination of an added clarifier and/or acid cracking not succeed in reaching the 100 mg/l limit for oil and grease, immediate work is to be initiated to implement a pilot study on the proposed alternate air flotation. Under this scenario, Hanesbrands Inc. is to notify Clarksville Light & Water Co. in the June 29, 2007 progress report and a joint meeting shall be scheduled not later than July 15, 2007 to negotiate the timeframe for design, installation, and startup of the recommended system.

Hugh Harrison
General Manager
Clarksville Water & Light

Bruce Duncan
Vice President of Operations
Hanesbrands Inc.

Signed this 22nd day of May, 2007.

Notary

A-4e

Copy – Attachment A-5

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

November 30, 2006

Cathy Rocole
Environmental Manager
Greenville Tube
P.O. Box 550
Clarksville AR 72830

RE: pH violation

Dear Cathy,

During routine quarterly testing, we discovered the pH was 5.35 s.u. which is outside the limit of 6.0 to 9.0 s.u. We have already discussed this over the phone, but I do need a letter explaining the corrective action taken.

Thank you,

Gregg Rainey
Superintendent

Pam Crow
Pretreatment Coordinator

Copy

GREENVILLE TUBE COMPANY

"Excellence in Quality and Delivery"

December 7, 2006

City of Clarksville
Ms. Pam Crow
P.O. Box 1807
Clarksville, AR 72830

Dear Ms. Pam Crow,

Greenville Tube Company has reviewed its current procedures for monitoring of our passivation rinse tank pH, due to the quarterly pH reading being in non-conformance of permitted limits. As mentioned before, we were in process of troubleshooting a possible issue with the pH meter. The pH meter was calibrated on 10-9-06, and the passivation rinse water is checked on a daily basis with a handheld meter to ensure our readings are similar. The pH meter was re-calibrated on 11-15-06 when a calibration problem was confirmed. This calibration issue will be closely monitored to assure the pH meter is in calibration.

On November 29, 2006 a new digital pH meter control unit, Hanna Instruments model number HI-21221-1, and a new probe were ordered as a precautionary measure and to modernize our monitoring equipment. As soon as we receive the equipment, it will be installed.

The normal monthly readings for November have been taken and were in compliance. I have enclosed these results.

Sincerely,

Cathy Rocole

Cathy Rocole
Environmental Manager

Attachment A-6

"Excellence in Quality and Delivery"

GREENVILLE TUBE COMPANY

Copy

April 20, 2007

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

Dear Pam Crow

On April 14, 2007, at Greenville Tube the nitric acid passivation tank was cleaned, and nitric acid was replaced with a citric acid based passivation treatment. I have enclosed a copy of the waste manifest for the neutralized nitric acid. The nitric acid was replaced with CitriSurf 2050. There are no hazardous ingredients contained in CitriSurf 2050. I have enclosed the MSDS for CitriSurf 2050. The working concentration of passivation bath is 10% by weight and the pH is 1.8-2.0. As the tubes are rinsed in the passivation rinse tank, the pH is closely monitored, and soda ash is added, as needed, to maintain a pH between 6 and 9 in the passivation rinse tank. If I can be of further assistance, or if you have any questions or concerns, feel free to call me, 754-6500.

Sincerely

Cathy Rocole

Cathy Rocole
Environmental Manager

GREENVILLE TUBE COMPANY • Stainless Steel Pipe & Tubing
P.O. Box 550 • Clarksville, AR 72830 • (479) 754-6500 • Fax (479) 754-8436
www.greenvilletube.com

RC
4/26/07
P.C

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number
ARR000014027	1	479-754-8500	[illegible]

5. Generator's Name and Mailing Address

GREENVILLE TUBE CORP
[illegible]
CLARKSVILLE, AR 72830

Generator's Phone: 479-754-8500

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: PERMA FIX TREATMENT [illegible] — U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address

PERMAFIX TULSA
3700 S. 25TH WEST AVE.
TULSA, OK 74107 USA

U.S. EPA ID Number: OKD000402396

Facility's Phone: 918-582-9595

	9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.
1.	NEUTRALIZED NITRIC ACID SOLUTION NON HAZARDOUS/NON REGULATED #ATE5679		TT	2500	G
2.					
3.					
4.					

13. Special Handling Instructions and Additional Information

NEEDS CD SENT TO US WASTE 24 HR EMERGENCY CONTACT CATHY ROCOLE 479-754-8500 CC35638

14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Generator's/Offeror's Printed/Typed Name: [illegible] — Signature: [illegible] — Month [illegible] Day [illegible] Year

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter Signature (for exports only): Date leaving U.S.:

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Bob York — Signature: [signature] — Month 5 Day 1 Year 07

Transporter 2 Printed/Typed Name — Signature — Month Day Year

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator) — Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name — Signature — Month Day Year

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

Attachment A-7

Copy

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

1. FIRM NAME Greenville Tube Date: 12-3-03

ADDRESS P.O. Box 550 - 501 S. Montgomery
Clarksville, AR 72830

PHONE: 479-754-6500

2. North American Industrial Classification Code Number (s) 331491

3. List other environmental control permits held at this time: Air, NPDES, Stormwater

4. Quantity of Wastewater:

Discharged to Clarksville Sewer	Average Daily (30 Day Avg.)	Maximum Daily (1 Day)
a. Process Wastewater from Passivation Operation	5500	6000
b. Domestic Wastewater from Sanitary Sewer	3500	4000
c. Non-contact Cooling Water	N/A	N/A
d. Total Wastewater Discharged to Public Sewage Works	9000	10,000

List Periodic or Seasonal Variation: Winter & spring months may be slightly higher

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.

RECEIVED 12/23/03

Parameter	Concentration Average Daily (30 Day)	Maximum Daily (1 Day)
Biochemical Oxygen Demand (5 Day), mg/l(1)	N/A	N/A
Total Suspended Solids, mg/l (1)	N/A	N/A
pH – pH Units (6 – 9)	7	9
Oil & Grease, mg/l (2)	1.39	25
Temperature, (150 degrees F Maximum)	100°	110°
Copper	0.053	1
Lead	0.0059	0.01
Silver	0	0
Zinc	0.035	0.2

(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.

Priority Pollutant Number	Parameter	Concentration – mg/l Average Daily (30 Day)	Maximum Daily (1 Day)
087	Trichloroethylene	0.0012	0.01
119	Chromium	0.278	0.15
124	Nickel	0.452	0.7
118	Cadmium	0	0

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.

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

Stainless steel tubes are drawn, annealed, degreased, straightened, passivated, cut to length & sand blasted

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

Stainless steel tubing is manufactured at a rate of approx. 900,000 feet per month.

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

Raw materials consist of stainless steel tube hollow, & strip. Raw material is processed at a rate of approx. 30,000 pounds per day with a maximum of approx. 40,000.

d. Number of employes 185 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.

Plant hours - Sun 11:00pm - Fri 11:00pm

Discharge is continuous

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

Yes X No _____

A-7d

Applicable National Categorical Standards: 40 CFR 433.17

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

    Yes X No _____

    Remarks: _____

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: N/A

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.

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 Harry R Holstead Date 12/18/03

Name of Signee _____ Title of Signee _____
(Please Print) (Please Print)

Name and phone number of contact regarding permit information: _____

Travis Renfroe 479-754-6500

CORPORATE ACKNOWLEDGMENT

STATE OF ARKANSAS

COUNTY OF Johnson

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

Harry R. Holstead of _____

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 18th day of December, 2003

Susan E Miller

Notary Public in and for Johnson County, Arkansas

SUSAN E. MILLER
Johnson County
My Commission Expires
March 6, 2013

My commission expires _____.

Attachment No. 1

PRIORITY POLLUTANTS

Volatile Compounds

002	Acrolein
004	Benzene
006	Carbon Tetrachloride
051	Chlorodibromomethane
019	2-Chloroethylvinyl Ether
048	Dichlorobromomethane
010	1,2-Dichloroethane
032	1,2-Dichloropropane
038	Ethylbenzene
045	Methyl Chloride
015	1,1,2,2-Tetrachloroethane
086	Toluene
011	1,1,1-Trichloroethane
087	Trichloroethylene
088	Vinyl Chloride
003	Acrylonitrile
047	Bromoform
007	Chlorobenzene
016	Chloroethane
023	Chloroform
013	1,1-Dichloroethane
029	1,1-Dichloroethylene
033	1,3-Dichloropropylene
046	Methyl Bromide
044	Methylene Chloride
085	Tetrachloroethylene
030	1,2-Trans-Dichloroethylene
014	1,1,2-Trichloroethane

Acid Compounds

024	Chlorophenol
034	2,4-Dimethylphenol
059	2,4-Dinitrophenol
058	4-Nitrophenol
064	Pentachlorophenol
021	2,4,6-Trichlorophenol
031	2,4-Dichlorophenol
060	4,6-Dinitro-O-Cresol
057	2-Nitrophenol
022	P-Chloto-M-Cresol
065	Phenol

Base/Neutral Compounds

001	Acenaphthene
078	Anthracene
072	Benzo(a)Anthracene
074	Benzo(b)Fluoranthene
075	Benzo(k)Fluoranthene
018	Bis(2-Chloroethyl)Ether
017	Bis(chloromethyl)Ether
066	Bis(2-Ethylhexyl)Phthalate
067	Butyl Benzyl Phthalate
040	4-Chlorophenyl Phenyl Ether
082	Dibenzo(a,h)Anthracene
026	1,3-Dichlorobenzene
028	3,3-Dichlorobenzidine
071	Dimethyl Phthalate
035	2,4-Dinithrotoluene
069	Di-N-Octyl Phthalate
039	Fluoranthene
080	Fluorene
052	Hexachlorobutadiene
012	Hexachloroethane
054	Isophorone
056	Nitrobenzene
063	N-Nitrosodi-N-Propylamine
081	Phenanthrene
077	Acenaphtylene
005	Benzidine
073	Benzo(a)Pyrene
079	Benzo(ghi)Perylene
043	Bis(2-Chloroethoxy)Methane
042	Bis(2-Chloroisopropyl)Ether
041	4-Bromophenyl Phenyl Ether
020	2-Chloronaphthalene
076	Chrysene
025	1,2-Dichlorobenzene
027	1,4-Dichlorobenzene
070	Diethyl Phthalate
068	Di-N-Butyl Phthalate
036	2,6-Dinitrotoluene
037	1,2-Diphenylhydrazine (as Azobenzene)
009	Hexachlorobenzene
053	Hexachlorocyclopentadien
083	Indeno(1,2,3-cd)Pyrene
055	Naphthalene
061	N-Nitrosodimethylamine
062	N-Nitrosodiphenylamine
084	Pyrene
008	1,2,4-Trichlorobenzene

PRIORITY POLLUTANTS (Continued)

Pesticides and PCBs

089	Aldrin	104	Gamma-BHC
102	Alpha-BHC	105	Delta-BHC
103	Beta-BHC	091	Chlordane
092	4,4' DDT	093	4,4' DDE
094	4,4'-DDD	090	Dieldrin
095	Alpha-endosulfan	096	Beta-Endosulfan
097	Endosulfan Sulfate	098	Endrin
099	Endrin Aldehyde	100	Heptachlor
101	Heptachlor Epoxide	106	PCB-1242
107	PCB-1254	108	PCB-1221
109	PCB-1232	110	PCB-1248
111	PCB-1260	112	PCB-1016
113	Toxaphene		

Metals and Cyanide

114	Antimony	115	Arsenic
117	Beryllium	118	Cadmium
119	Chromium	120	Copper
122	Lead	123	Mercury
124	Nickel	125	Selenium
126	Silver	127	Thallium
128	Zinc	121	Cyanide

Miscellaneous

129 2,3,7,8-Tetrachlorodibenzo-P-Dioxin (TCDD)
116 Asbestos

Copy

Attachment A-8

FACT SHEET

Industry Greenville Tube

Address P.O. Box 550
Montgomery & Lucas
Clarksville AR 72830

Permit # 06

SIC 3354 | 3317

Contacts Name	Phone #	Title
Cathy Rocole	479-754-6500	Environmental Manager

Emergency Contacts Name	Phone #	Title
Reggie Holstead	479-754-6500	Plant Mangger

Category Metal Finisher / categorical

Max Flow 10,000 per day

Discharge Point North of rinse tank

Sampling Parameters Cd Cr, Cu, Pb, Ni, Ag, Zn, pH, Oil & Grease, Temp

Description Of Industry Actives Metal tubing, tubes are drawn, annealed degreased, straightened, passivated, cut to lenght, sand blasted, polished

Description Of Stored Chemicals Trichoroethylene, Calument, TD4 T 265, caustic soda, [redacted] Nitric acid, polishing oil, soda ash.

Other Information Greenville Tube is talking about changing from Nitric [redacted] acid to citric acid, and about getting rid of the trichoroethylene TCE

Attachment A-9

Copy

May Monitoring

I certify that all information included in this report is true and accurate to the best of my knowledge.

Cathy Rocole Date 6-5-07

Cathy Rocole
Environmental Manager
Greenville Tube Company

Monthly Water Flow (gallons) 21,500

109645

L388-039089

EEG
Environmental Enterprise Group, Inc.
PROVIDING CUSTOMIZED SERVICES NATIONWIDE

Company Name:	Phone #:
Greenville Tube	(479) 754-6500
Address:	**Fax #:**
P.O. Box 550 Clarksville, AR 72830	(479) 754-8426
Project Name or Number:	**Purchase Order #:**
Sampling Personnel Signature(s):	**Printed :** Andrew Zunker

	Sample I.D.	Date	Time	Comp.	Grab	Cont.Type: Plast.	Cont.Type: Glass	# of Containers	Method Preserved: H2SO4	HNO3	NAOH	HCL	Ice	None	Sample Matrix: Water	Soil	Air	Sludge	Other	Requested Analysis: Metals*(200.7)	O&G	pH	Laboratory Control Number	Remarks (Please note special detection limits below.)
(1)	Passivator	5-9-07 5-10-07	1240 1300	X		X		1		X			X		X					X			0507097	
(2)	Passivator	5-10-07	1302		X		X	1	X				X		X						X		0507098	
	Passivator	1	1303		X	X		0							X							X	0507099	

Relinquished by:		Date: 5-10-07	Time: 1600	Received by:	Date:	Time:
Received by:		Date:	Time:	Relinquished by:	Date:	Time:
Relinquished by:		Date:	Time:	Received by Laboratory:	Date: 11 May 07	Time: 0930

Comments: Metals: Cd, Cr(Total), Cu, Pb, Ni, Ag, Zn
Method 200.7 Zn Detection Limit 20 ug/L

6.8 @ 1303
34.1

A-96

Copy

Attachment A-10

Toxic Organic Solvent Management Plan

For

Greenville Tube Company
Clarksville, AR

Revised: September, 2006

Revised By: Cathy Rocole
Environmental Manager
Greenville Tube

Revisions:

Page 2
I have included current practices for the neutralization of the passivation rinse tank, and discharging to the city of the neutralized passivation rinse water, and required testing of the rinse water. The procedure for the removal and disposal of neutralized nitric acid passivation solution has also been included.

Page 5
I have included the location of the spill kits, and revised the list of contact people to include current employees of Greenville Tube.

Rec 10/2/06 PC

TOXIC ORGANIC SOLVENT MANAGEMENT PLAN

for

GREENVILLE TUBE CORPORATION
CLARKSVILLE, ARKANSAS

July, 1998

Prepared By:

OSWALD ENGINEERING, INC.

A-10 b

TABLE OF CONTENTS

I. Description of Facilities and Solvent Use

A. Process Description

Greenville Tube Corporation (GTC) manufactures stainless steel tubing of various diameters from hollows and coiled flat steel strips. The flat strip is cylindrically shaped and welded in a tube-weld mill. Both types of tubing enter the swaging process where one end is formed for insertion in a die and a mandrel is inserted into the other. The tubing is then drawn to a circumferential-size specification.

The drawing process results in soiled and work-hardened tubing. The soils, which include high-boiling hydrocarbons and chlorinated paraffins, are removed with trichloroethylene (TCE) in a degreaser and the tubing is softened in the annealing furnaces. The swaging, drawing, cutting, cleaning and annealing may be repeated several times before the desired size is obtained. The properly sized tubing is straightened; cut to lengths; sanded; sandblasted; and passivated, using a nitric acid solution, rinsed, and dried before packaging for shipping.

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.

Water is use at the manufacturing facility for the following purposes: Sanitary, cooling, boiler makeup, passivator nitric 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 wastewater 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 blackflow 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 as needed bases to replace water lost due to cooling tower evaporation.

Process water for the passivator nitric solution make-up and passivator rinse water is obtained primarily from a ground water sump located at the south end of the vault beneath the degreaser. A previous study found the groundwater beneath the property contains TCE and related degradation compounds as well as chlorinated paraffin and hydrocarbons, which are by-products of the drawing process. As a consequence of this discovery an air stripper has been installed as a ground water treatment system to reduce those compounds to an acceptable level prior to use as passivation rinse water. During periods of dry weather, city water is used as needed to augment the process supply. The current rinse water tank overflow is currently discharged to Clarksville wastewater facility, after neutralization. Representative monthly samples are collected by EEG of Russellville, AR. The monthly flow reading is taken by the environmental representative, of Greenville Tube. The results of the monthly sampling and flow reading are submitted to Clarksville Light and Water as required per Permit No. 06. Records are maintained in the environmental office. Spent nitric acid solution is neutralized, and a vacuum truck is used to take the neutralized nitric acid solution to a licensed hazardous waste disposer.

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

B. Identification of Toxic Organic Chemical Entering the Plant Wastewaters

1. Chemical Analysis of Treated Wastewater

A sample was taken of the rinse waster 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 where operating at normal production rates. Samples were analyzed by gas chromatography with compound identification and quantification by masspectrophotometer (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 .01 mg/l and is listed in Table 1.

Table 1

Compound	Concentration (06/04/98)
Trichloroethene	.0149 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 laboratory analysis is enclosed in Attachment I.

2. Identification of Solvents Used in Manufacturing Operations

   a. TRICHLOROETHYLENE - contains trichloroethylene.

   b. Calumet 142 F Naphtha R66 - contains petroleum naptha solvent.

   c. Kermal (k)500 Solvent - contains petroleum hydrocarbon distillate including kerosine and stodder solvent.

   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.

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.

   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.

II. Description of Control Options Explored

A. Solvent Substitution

GTC is continually exploring the feasibility of substituting other products that do not contain toxic organic materials. Obviously, this would be the most effective manner of eliminating the potential of toxic organic discharges both from process operations and spillage. At the present time, GTC knows of no alternative solvents and/or paint compounds that could be used without adversely affecting the process and final products.

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 is also located in the Boiler Room. A curb should be 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 existing sump pump could

be turned off and the spilled material removed and recovered.

F. Spill Clean-up Equipment and Material Storage Stations

As part of the Toxic Organics Management Plan, the plant manager shall issue a memorandum to all employees that reads as follows:

"Subject: Accidental Discharge to Sewer"

Under no circumstances should any solvent or other liquids other than on going process waster, be allowed to discharge into a drain fixture that will enter the sewer system.

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; such as the spill kit contained in the laboratory. The residue should be transferred to 55 drums and disposed of properly.

In case of an accidental spill that discharges into the sewer system, the employee(s) should contact their foreman as to the quantity and type of spill involved. This information will be forwarded to the following individuals: Cathy Rocole, Environmental Manager, Amber Parham, Environmental Assistant, or Sid Kern. One of these individuals will contact the proper authorities (Clarksville Light and Water).

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

Oil dry, clay based absorbent, is distributed throughout the manufacturing area, to provide spill containment and removal. There are absorbent spill containment socks, pillows, and pads kept in the laboratory. The spent absorbent is swept and shoveled into a 55 gallon drum for storage and proper disposal.

III. Toxic Organic Management Plan

As a result of the above analysis, GTC believes 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 will continue exploring the feasibility of substituting current solvents with products which do not contain toxic organic compounds. At the present time, GTC knows of no alternative products that could be used without adversely affecting the production process and final products.

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 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 contains no floor drains.

D. Sealing Floor Drains

Floor drains and cleanouts are to be sealed in all areas where they are not required. In the Boiler Room, a curb should be 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 occurred the existing sump pump is to be turned off and the spilled material removed and recovered.

E. Spill Clean-up Equipment and Material Storage Stations

The plant is currently equipped throughout the manufacturing area with a clay based absorbant 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).

F. 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 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.

G. 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.

H. 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, reuse, 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.

I. Implementation

All provisions of this plan will be fully implemented by September 1, 1998.

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 August 25, 1998."

Reggie Holstead
Plant Manager
Greenville Tube Corporation
Telephone: (501) 754-6500

Prepared by:

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

A-10K

Attachment 6

*Copy

CLARKSVILLE LIGHT AND WATER COMMISSION
INDUSTRIAL USER INSPECTION REPORT

NAME AND ADDRESS OF INDUSTRIAL FACILITY:
Greenville Tube
P.O. Box 550
501 S. Montgomery
Clarksville
PHONE# 479-754-6500

DATE OF INSPECTION: 9/20/06
TIME OF INSPECTION: 0903
NAICS# 331491
SIC# 3356 3317
I.U. PERMIT # 06
INSPECTED BY: Pam Crow / Jessa Ray

Cathy Rocole Environmental Manager 479-754-6500
RESPONSIBLE OFFICIAL TITLE PHONE NO.

Cathy Rocole Environmental manager 479-754-6500 Cathy Rocole
FACILITY REPRESENTATIVE TITLE PHONE NO. SIGNATURE

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

INDUSTRY TYPE /CATEGORY Metal Finishers / Categorical

NATURE OF OPERATION Metal Tubing

PURPOSE OF INSPECTION Annual

LAST OCCURRENCE OF NON COMPLIANCE P.V. 10/5/05 ~~6/14/01~~ pH

NUMBER OF EMPLOYES 206 WORK HOURS PER DAY 24 WORK DAYS PER WEEK 5

*WATER SOURCE CITY 2,096,400 GAL. WATER USAGE SANITARY Saml GAL.
*higher than 7/19/06 – 8/21/06 study due to cleaning and low water levels in artesian well
PROCESS WATER 52,300 GAL. Aug. 06

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

RAW MATERIALS:

stainless steal hollow tubing, stainless steal strips

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

DATE OF INSPECTION: 9/20/06
TIME OF INSPECTION: 0903
INSPECTED BY: Pam Crow / Stanley

IU Name: Greenville Tube

Looking at getting rid of TCE within the year. Greenville Tube has sold out to a new company, the name will remain the same.

PRODUCTS PRODUCED AND PROCESS DISCRIPTION:

Metal tubing, tubes are drawn, annealed degreased straightened, passivated, cut to lenght, sand blasted, polished

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)	Others:	☐ YES	☐ NO

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

Mechanical, Tubro meter

LOCATION

North of rinse tank

CONFIRM ACCURACY

Oct. 05

PRETREATMENT FACILITIES OPERATION AND MAINTENANCE:

(A) Standby power or other equivalent provisions provided Lights ☑ YES ☐ NO

DATE OF INSPECTION: 9/20/06
TIME OF INSPECTION: 0903
INSPECTED BY: Pam Crow / Drew Ray

IU Name: Greenville Tube

(B)	Adequate alarm system for power or equivalent failures on rinse tank for pH	☑ YES	☐ NO	
(C)	Sludges and solids adequately disposed 11/06 2500 gal Vopak Logistics Services	☑ Yes	☐ No	
(D)	All treatment units in service	☑ Yes	☐ No	
(E)	Consulting Engineer retained or available for consultation on operation & maintenance problems	☑ Yes	☐ No	
(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 pc	☑ Yes	☐ No	☐ n/a

LABORATORY PROCEDURES:

(A)	Does the industry perform any lab analysis itself?	☐ Yes	☑ No	☐ n/a
(B)	Sampling locations. Inside passivator rinse tank	☑ Yes	☐ No	☐ n/a
(C)	Sampling / preservation technique Bottles preserved by EEG	☑ Yes	☐ No	☐ n/a
(D)	Observation of I U self monitoring produres	☐ 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 Suite 200
Russellville AR 72801
Phone 479-968-6767 Fax 479-968-1956
1-800-530-4968

DATE OF INSPECTION: 9/20/04
TIME OF INSPECTION: 0903
INSPECTED BY: Pam Crow / [illegible]

IU Name: Greenville Tube

Contact Mike Cole
Parameters tested for by commercial lab. CFR 40 433, oil + grease, pH + Temp, TCE

TOXIC ORGANICS MANAGEMENT PLAN:

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

Goes through passivator rinse tank then discharged to city sewer, pH adjustment with soda ash when needed

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

Trichloroethylene (in process) Calument 142F 50 to 200 gal, T26 Rinse 5gal max T265 Make Up Fluid Ink Stencil Aid 1 gal, caustic soda 1-55gal drum Nitric acid 1-55 gal drum appox 3-4 55gal drum (for drawing), Polishing oils chevron 45B, Chevron 11D soda ash 15-20 40-50lb bags

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

Contain with spill kit, Notify City + proper authorities

(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

Weekly inspects, daily observation, walk through

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

all chemicals are stored in virgin materials

(F) Manifests of shipme[illegible]ched ☑ Yes ☐ No ☐ n/a

Nitric ac[illegible] + TCE

On next inspection ask [illegible]

Revised 5/2002

A-11d

DATE OF INSPECTION: 9/20/06

TIME OF INSPECTION: 0903

IU Name: Greenville Tube

INSPECTED BY: Pam Crow / Greg Ray

(G) Does SIU have a TTO limit in permit? 40 CFR 433.17 ☑ Yes ☐ No ☐ n/a

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

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

Reason: needs to be up dated

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

Comments: 10/5/05 malfunction of pH meter.

IU inspection summary ☐ Yes ☐ No ☐ n/a

during our inspection Cathy was very helpful and informative

Recommended action:

We did recommend updating the TOMP. (This was done and recived 10/2/06)

Revised 5/2002

A-11e

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY
P.O. Box 13087
Austin, Texas 78711-3087

2627/149

ORDER # 354625

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
	A R R 0 0 0 0 1 4 0 2 7	Ole 1 09		

3. Generator's Name and Mailing Address
GREENVILLE TUBE CORP
SOUTH MONTGOMERY STREET
P O BOX 550; CLARKSVILLE, AR 72830

4. Generator's Phone (479) 754-6500 EMERGENCY CONTACT: BOX 15

A. State Manifest Document Number: 3800109

B. State Generator's ID: 99905

5. Transporter 1 Company Name: TRIAD TRANSPORT, INC.

6. US EPA ID Number: O.K.D.9.8.1.5.8.8.7.9.1

C. State Transporter's ID:

D. Transporter's Phone: 800-324-1139

7. Transporter 2 Company Name:

8. US EPA ID Number:

E. State Transporter's ID: 41038

F. Transporter's Phone:

9. Designated Facility Name and Site Address
VOPAK LOGISTICS SERVICES USA, INC
2759 BATTLE GROUND RD
DEER PARK, TX 77536

10. US EPA ID Number: T.X.D.0.9.7.6.7.3.1.4.9

G. State Facility's ID: 30567

H. Facility's Phone: 281-604-6150

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
X	a. ~~RQ, HAZARDOUS WASTE, LIQUID, N.O.S.~~ (CHROMIUM) 9, NA3082, PG III, (RQ=10), (EPA D007), (ERG 171)	001	T T	02500	G	D007 OUTS101H
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above
11a. EM-1111-0889 WASTEWATER W/NITRIC ACID

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information WEAR APPROPRIATE PROTECTIVE GEAR WHEN HANDLING. EMERGENCY CONTACT: CHEMTREC: 1-800-424-9300. CALLER MUST IDENTIFY UNIVAR USA AS SHIPPER.
PLACARDS PROVIDED BY (CARRIER)/SHIPPER (YES)/NO DRIVER SIGNATURE Doug Martin

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
Cathy Rocole	Cathy Rocole	01	21	06

17. Transporter 1 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name	Signature	Month	Day	Year
DOUG MARTIN	Doug Martin	01	21	06

18. Transporter 2 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date: Month	Day	Year
[illegible]	[illegible]	01	23	06

GENERATOR
TRANSPORTER
FACILITY

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: A R D 0 0 8 1 4 0 2 7
Manifest Document No.: 75427
2. Page 1 of 2
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
GREENVILLE TUBE CORP
SOUTH MONTGOMERY STREET
P O BOX 553; CLARKSVILLE, AR 72830
4. Generator's Phone (479) 754-6500 EMERGENCY CONTACT: BOX 15

A. State Manifest Document Number: 375427
B. State Generator's ID: 99905

5. Transporter 1 Company Name: UNIVAR USA INC.
6. US EPA ID Number: A R D 0 7 1 2 4 5 4 0 1
C. State Transporter's ID: 41134
D. Transporter's Phone: 501-982-4402

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
POLLUTION CONTROL MILLINGTON
5486 VICTORY LANE
MILLINGTON, TN 38053
10. US EPA ID Number: T N D 0 0 0 7 7 2 1 8 6
G. State Facility's ID
H. Facility's Phone: 901-353-5291

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ, WASTE TOXIC LIQUIDS, FLAMMABLE, ORGANIC, N.O.S. (TRICHLOROETHYLENE, ETHYL ALCOHOL) 6.1, UN2929, PG II, (RQ=100), (EPA D001 D040 F001), (ERG 131)	X	003	D·M	1655	P	D001 D040 F001
b.	RQ, WASTE TRICHLOROETHYLENE 6.1, UN1710, PG III, (RQ=100), (EPA D040 F001), (ERG 160)	X	001	D·M	370	P	D040 F001
c.	RQ, WASTE TOXIC SOLIDS, ORGANIC, N.O.S. (TRICHLOROETHYLENE) 6.1, UN2811, PG III, (RQ=100), (EPA D040 F001), (ERG 154)	X	002	D·M	1190	P	D040 F001
d.	NON REGULATED MATERIAL		010	D·M	1565	P	

J. Additional Descriptions for Materials Listed Above
11a. 050100556LI TRICHLOROETHYLENE/INK
11b. 050100556LF TRICHLOROETHYLENE SOLID
11c. 060400634NTC STAUROLITE BLASTING MEDIA & DRY TRICHLO
11d. 0104039955 POLISHING SLUDGE CM 29230

K. Handling Codes for Wastes Listed Above: S01

15. Special Handling Instructions and Additional Information
WEAR APPROPRIATE PROTECTIVE GEAR WHEN HANDLING.
EMERGENCY CONTACT: CHEMTREC: 1-800-424-9300. CALLER MUST IDENTIFY UNIVAR USA AS SHIPPER.
PLACARDS PROVIDED BY CARRIER/SHIPPER YES/NO DRIVER SIGNATURE

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Cathy Roode
Signature: Cathy Roode
Month Day Year: 07 11 06

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: RON HALL
Signature: Ron Hall
Month Day Year: 07 11 06

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: D Sauer
Signature: D Sauer
Month Day Year: 07 12 06

TDS Form 8700-22 (Rev. 8-81-05) Previous edition obsolete.

A-11g

EMERGENCY CONTACT TELEPHONE NUMBER

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.: A R R 0 0 0 0 1 4 0 2 7

Manifest Document No.: 75427

22. Page: 2 of 2

Information in the shaded areas is not required by Federal law.

23. Generator's Name
GREENVILLE TUBE CORP
SOUTH MONTGOMERY STREET
P O BOX 550; CLARKSVILLE, AR 72830
479-754-6500 EMERGENCY CONTACT: BOX 32

L. State Manifest Document Number: 375427

M. State Generator's ID: 99904

24. Transporter ___ Company Name — 25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter ___ Company Name — 27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	29. Containers No	29. Containers Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a. NON REGULATED MATERIAL	~~001~~	D M	~~400~~	~~P~~	
b. NON REGULATED MATERIAL	002	D M	985	P	
c.					
d.					
e.					
f.					
g.					
h.					
i.					

ok

S. Additional Descriptions for Materials Listed Above
28a. ~~[illegible]~~ ok
28b. 0104000SLF USED OIL WASTE

T. Handling Codes for Wastes Listed Above
S01

32. Special Handling Instructions and Additional Information
WEAR APPROPRIATE PROTECTIVE GEAR WHEN HANDLING.
EMERGENCY CONTACT: CHEMTREC: 1-800-424-9300. CALLER MUST IDENTIFY UNIVAR USA AS SHIPPER.
PLACARDS PROVIDED BY CARRIER/SHIPPER YES/NO DRIVER SIGNATURE ____________

33. Transporter ___ Acknowledgement of Receipt of Materials
Printed/Typed Name: Ron Hak — Signature: [signature] — Date (Month Date Year): 07 17 06

34. Transporter ___ Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date (Month Date Year)

35. Discrepancy Indication Space

Attachment A-1C

Copy

DIVISION OF PUBLIC WORKS
INDUSTRIAL PRETREATMENT SECTION

SLUG/SPILL EVALUATION CHECKLIST

SIU NAME: Greenville Tube

PERMIT NO.: 06 CONTACT: Cathy Rocole

1. SPILL PLAN

a. Type on file: (PIPP, SPCC, TOMP, Contingency): TOMP Date: 7/98

b. Number of Spills in last 3 years: N/A.

2. CHEMICAL STORAGE

a. Attach chemical list, including location of chemical, quantity stored, and container size.

b. Containment: Yes ✓ No ____ Describe: Barrier walls sloped to contain all chemicals

Condition: Good ✓ Fair ____ Poor ____ N/A ____

c. Drains/Trenches: Yes ____ No ✓ Routed to: ____

Distance from storage tanks or drums (in feet): ____

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

3. MANUFACTURING PROCESSES

a. Process solutions in tanks

Chemical Solution Name	Location (attach sketch)	Process Tank Size (in gallons)
Nitric acid		2500
TCE		7052 max

MANUFACTURING PROCESSES - Cont'd

b. Do process solution tanks overflow? Yes _____ No ✓

If so, is overflow liquid contained? Yes — No —

Describe containment: _____

Condition of containment: Good ✓ Fair _____ Poor _____ N/A _____

c. Drains/Trenches: Yes _____ No ✓ Routed to: —

Distance from Process Tanks (in feet): _____

d. Spill Potential (High, Medium, Low): ~~Low~~ N/A

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)

monthly in house for process control

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 adjust pH as necessary w/ soda ash

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 _____

6. **SPECIFIC PROHIBITIONS:**

a. Are any items present? Yes ____ No ✓

b. Potential to discharge: High ____ Medium ____ Low ____ N/A ✓

7. **NON-ROUTINE BATCH DISCHARGES:**

a. Does facility have these type of discharges? Yes ____ No ✓

(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 ____

b. List these Non-Discharged Wastes, if "yes":

Type of Waste (Examples: waste solvent, waste oil, pretreatment sludge, etc.)	Quantity per Year Generated	Disposal Method
Nitric Acid	2500 gal	contract Vopak
TCE	16,465 lbs	contract Univar

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

in containment structers, barrles are made of stainless steal, Nitric Acid, allowed on property for 90 days max.

RECOMMENDATIONS

a. _____ Existing Spill Plan adequate, Combined Slug/Spill Control Plan not needed.

b. ✓ New Slug/Spill Control Plan required up date.

c. _____ Add slug provisions to existing Spill Plan

d. _____ Other deficiencies to be corrected: _____

_____

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

Signature: Pam Crow Date: 9/22/06

A-12d

DISCHARGE LIMIT VIOLATION

	Noncompliance	Nature of the Violation	Range of Enforcement Responses	Personnel
1.	Exceedance of Pretreatment Standard (discharge limits)	Isolated, not significant	Phone call; Informal Letter NOV (isolated and 2nd offense)	PC, "S," GM
		Isolated, significant with no known damage resulting	NOV; Compliance meeting; AO to develop spill prevention plan	PC, "S," GM, CA
		Isolated, resulting in damage to POTW or environment	Show cause; civil action to recover monetary loss	PC, "S," GM CA, Com.
		Recurring, with no known damage resulting	NOV; compliance meeting; AO to develop compliance plan; consent order with penalties	PC, "S," GM, CA, Com.
		Recurring; resulting in damage to POTW or environment	Order to suspend discharge; AO to show cause; civil action to recover monetary loss; consent order; termination of service	PC, "S," GM, CA, Com.

[1] Nothing in this Enforcement Response Guide shall limit the authority of Clarksville Light and Water Commission to take any action, including emergency actions or any other enforcement action, without first taking a prerequisite action against the User.

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

EPA NPDES Compliance Inspection Report

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

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1	2 5	3 AR0022187 11	12 07/06/12 17	18 6	19 S	20 1

Remarks: PRETREATMENT PROGRAM AUDIT

21 66

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

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1	2 5	3 AR0022187 11	12 07/06/13 17	18 4	19 S	20 2

Remarks: 04 SIU SITE VISITS

21 66

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

Section B: Facility Data

Name and Location of Facility Inspected
City of Clarksville's Pretreatment Program
PO Box 1807 (1305 S. Crawford)
Clarksville, AR 72830

Entry Time	Permit Effective Date
☒ AM ☐ PM 7:30	1/1/04
Exit Time/Date	**Permit Expiration Date**
1:00 pm 6/14/07	12/31/08

CODE SHEET

Pretreatment Audit

		CODE
Auditor's Name	Gillian	
Permit Number	AR0022187	
Audit Date	6/12-14/07	DTIA
Date Permit Modified to require pretreatment	2/14/83	PTIM

PPETS WENDB DATA ELEMENTS

Significant IUs without Control Mechanisms	0	NOCM
Number of Significant IUs	4	SIUS
Number of Categorical IUs	2	CIUS
Technical Evaluation for Local Limits	Y	EVLL
Adoption of Technically-Based Local Limits	Y	ADLL
Significant IUs not inspected or sampled	0	NOIN*
Significant IUs in significant noncompliance with standards or reporting	1	PSNC*
Significant IUs in significant noncompliance with self-monitoring	0	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	0	SNIN*