

# ADEQ

ARKANSAS  
Department of Environmental Quality

February 28, 2011

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

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

Dear Mr. Rainey,

Please find enclosed the finished report for the audit/assessment conducted November 8 – 10, 2010. The contents should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the recommendations. Your Program is in compliance with the Federal Pretreatment Requirements in 40 CFR 403 and your current Pretreatment Program.

In this auditor's opinion, the City has a staff well qualified and involved in the Program and its implementation. They should be lauded for their efforts. The public outreach with quarterly newsletters regarding various environmental issues will, in the future, help the citizens of Clarksville truly all become stakeholders. Pollution Prevention efforts could be enhanced with minor adjustments within your day-to-day Pretreatment implementation practices.

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

Feel free to contact this office with any questions.

Sincerely,



Allen R. Gilliam  
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist

ec: Rudy Molina/EPA 6WQ-PO  
Eric Fleming/NPDES Inspector Supervisor  
Cindy Garner/NPDES Enforcement Manager  
E-drive\NPDES\NPDES\Pretreatment\Reports

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

NPDES PERMIT #AR0022187

February 28, 2011

PREPARED BY: ALLEN GILLIAM  
ADEQ STATE PRETREATMENT COORDINATOR

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## LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation

## A) INTRODUCTION

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

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

An audit/assessment was performed November 8 through 10, 2010, of the Pretreatment Program implemented by the City of Clarksville (City Light and Water), Arkansas. Participants included:

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

The goals of the audit/assessment were:

- \*To determine the implementation and compliance status of the City of Clarksville's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403;
- \*To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges;
- \*To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements and;
- \*To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

Clarksville's Pretreatment Program was originally approved 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, but a formal submission for Program modification was discussed

during this audit.

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

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

The POTW has a design flow of 2.0 MGD (including the holding lagoon) and an average flow of ~0.86 MGD. Approximately 9.57% of that is currently from three (3) significant industrial contributors, one (1) of which is a categorical metal finisher. One metal finisher, Baldor, ceased their CFR 433 core operation of phosphatizing February 2010. Therefore, the City currently has three (3) significant industrial contributors with Baldor now being considered a non-significant industrial user.

Approximately 61 dry tons of "Class B" quality biosolids were land applied in 2009. Yearly application rates vary widely from year to year depending on the tonnage accumulated, ready to be applied.

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

There were no apparent implementation deficiencies discovered during the audit, therefore, no required actions.

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

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

2) Recommend including more pertinent information on each of the permitted industries' fact sheets. Attachment A-3 gives a typical example of what the city is currently using. Start-up date, compliance history, narrative description of their manufacturing operations, an updated (and dated) wastewater flow schematic, permit limit rationale, actual permit limits, why they are considered "Significant", etc. would be a few pertinent facts to include. These fact sheets could be sent to the industry representative to fill out. See Appendix I in EPA's "Industrial User Permitting Guidance Manual" found at <http://www.epa.gov/npdes/pubs/owm0017.pdf> for more information to possibly add.

3) 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, any manufacturing certification programs they are in, etc.

4) Recommend including a picture of each industry's exact sampling point.

5) 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?

6) 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 "common knowledge" procedures actually documented would be very useful to help educate and cross train other city personnel in the Pretreatment Program's procedures.

7) 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.

8) Include P2 audits/assessments as an enforcement option in your existing Enforcement Response Plan.

9) 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.

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

11) Recommend writing articles to the local newspaper regarding information about the City's collection system, treatment plant operations and how the public can help preserve its use and life (water conservation, no dumping of household hazardous waste or pharmaceuticals, etc). It is the public's property paid for by their taxes.

**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**

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

\*\*\*\*\*

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

# PRETREATMENT AUDIT CHECKLIST

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information . . . . . Pages 1- 4  
 Section II: Pretreatment Program Analysis . . . . . Pages 5-17  
 Section III: Industrial User File Evaluation . . . . . Pages 18-25

### SECTION I: GENERAL INFORMATION

**A. GENERAL INFORMATION**

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

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

Telephone: 479.754.7929 FAX NUMBER: 479.754.8181

Pretreatment Contact: Pam Smith Title: Pretreatment Coordinator

Address: "

Telephone: "

E-mail pam.smith@clarksvillelightwater.com

Pretreatment program approval date: 2/14/83

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

Month Annual Pretreatment Report Due: February

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 11/08 - 11/10/10  
 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>*Pam Crow</u>	<u>Pretreatment Coordinator</u>	<u>479.754.7929</u>
<u>Greg Rainey</u>	<u>Wastewater Superintendent</u>	<u>"</u>

**\* Identifies Program Contact**

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>12/4/08</u>	<u>Not sampling metal finishers for CN</u>
<u>PCI</u>	<u>12/13/07</u>	<u>No apparent problems noted</u>



YES NO

      Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

      Is the Control Authority currently in SNC or RNC?

.....

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

# SECTION I: GENERAL INFORMATION

## B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR0022187	Clarksville Light & Water	4/1/09	3/31/14

### 2. Individual Treatment Plant Information

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

Treatment Plant Wastewater Flow: Design- 2.0 MGD; Actual (Average)- 0.864 MGD

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

#### Industrial Contribution to this Treatment Plant

# of SIUs: 3\* # of CIUs: 1\*

\* Baldor (CFR 433) shut down categorical process 2/10

Industrial Flow (gpd): 82,680 Industrial Flow (%) : 9.57\*

\*2 IUs have drastically increased production/flow

#### Level of Treatment

Type of Process(es):

Primary  (#002) three cell extended laagoon

Secondary  (#001) primary extended aeration, activated sludge; oxidation ditch; followed by secondary clarification

Tertiary \_\_\_\_\_

Method of Disinfection: chlorination

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

#### Effluent Discharge

Receiving Stream Name: Backwaters of Lake Dardenelle

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

Receiving Stream Use: primary contact rec./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:  
(2009)

<input checked="" type="checkbox"/> Land Application	<u>61.3</u> dry metric tons/yr. (Class B)
<input type="checkbox"/> Incineration	_____ dry tons/yr.
<input type="checkbox"/> Monofill	_____ dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	_____ dry tons/yr.
<input type="checkbox"/> Public Distribution	_____ dry tons/yr.
<input type="checkbox"/> Lagoon Storage	_____ dry tons/yr.
<input type="checkbox"/> Other (specify)	_____ dry tons/yr.

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

# SECTION I: GENERAL INFORMATION

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:  
All CFR 503 requirements

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?) No lethality nor sub-lethality shown in either species within the last 3 years.

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

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

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

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

"Stayed about the same"

YES NO N/A

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)

No report for CBOD  
(April '10)

This problem was corrected during the  
Audit. There were some mis-communications  
between ADEQ and the City.

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 non-substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.  
City submitted a modified Ordinance back in March '10 along with the check list. Other program sections' reviews are outstanding.  
The City is preparing a request for modification of their L.L./MAHLS.  
The spreadsheets were supplied to the City by ADEQ in 8/08.

1. Modifications:

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

2. Modifications in Progress:

Date Requested	Nature of Modification
<u>--</u>	<u>Local limits, ERP and other Program sections</u>

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<sup>2</sup>) 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<sup>2</sup> 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)] City conducted one on 4/08 & 6/08

✓      If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> activity?

✓ & ✓ Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

     ✓ If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P<sup>2</sup> activity and the distribution of P<sup>2</sup> 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:

<u>Name of IU</u>	<u>Type of Industry</u>	<u>Is the IU Permitted?</u>
<u>N/A</u>		

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] \*Baldor ceased categorical operations in February '10.
- 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)]

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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

YES NO

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

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

What is the maximum term of the control mechanism?   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:

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

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:

<u>Pollutant</u>	<u>Limit</u>
<u>N/A</u>	

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:

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

G. Application of Pretreatment Standards and Requirements

YES NO

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

2/4/09 Date Notified Letter Method of Notification

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

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

YES NO

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

If yes, complete the information below:

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

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Developed in '08 & now used on their inf/eff summary in their annual reports Numerical MAHLs used (ug/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	7.0
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	5.4
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	154
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	158
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	18.7
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	51.4
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.27
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	8.0
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	42.1
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	8.4
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	57.8
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	500

\* - 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?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
n/a	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>

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)	<u>  </u> n/a	<u>  </u>	<u>  </u>
Cadmium (Cd)	<u>  </u> "	<u>  </u>	<u>  </u>
Chromium-Total	<u>  </u> "	<u>  </u>	<u>  </u>
Copper (Cu)	<u>  </u> "	<u>  </u>	<u>  </u>
Cyanide (CN)	<u>  </u> "	<u>  </u>	<u>  </u>
Lead (Pb)	<u>  </u> "	<u>  </u>	<u>  </u>
Mercury (Hg)	<u>  </u> "	<u>  </u>	<u>  </u>
Molybdenum (Mo)	<u>  </u> "	<u>  </u>	<u>  </u>
Nickel (Ni)	<u>  </u> "	<u>  </u>	<u>  </u>
Selenium (Se)	<u>  </u> "	<u>  </u>	<u>  </u>
Silver (Ag)	<u>  </u> "	<u>  </u>	<u>  </u>
Zinc (Zn)	<u>  </u> "	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>

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

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

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

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

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

Does the Control Authority routinely split samples with industrial personnel:

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

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

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

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

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES   NO

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

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

5days Conventionals  
1 wk Metals  
2 wks Organics

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

Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: N/A

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

YES   NO

- Scheduled compliance monitoring
- Unscheduled compliance monitoring
- Demand monitoring for IU compliance
- IU self-monitoring
- Other: \_\_\_\_\_

YES   NO

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

**I. ENFORCEMENT**

YES   NO

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

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

YES   NO

- Describe how the Control Authority will investigate instances of noncompliance
- Describe the Control Authority's types of escalating enforcement responses and the periods for each response
- Identify by Title the Official(s) responsible for implementing each type of enforcement response
- Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

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

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

YES NO

           When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]

           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	Date	Return to Compliance?	
				Yes (Date)	No
N/A					

Indicate the number and percent of SIUs that were identified as being in significant noncompliance during the past Pretreatment reporting period: [1/1/10 -12/31/10]

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. \_\_\_\_\_  
 Has the Control Authority experienced any of the following:

YES NO

EXPLAIN and ID Industrial User

- Interference [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? Bright Harvest slug loaded the POTW with high O&G
- Heat problems? \_\_\_\_\_
- Interference due to oil or grease? \_\_\_\_\_
- Toxic fumes? \_\_\_\_\_
- Illicit dumping of hauled wastes? \_\_\_\_\_

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	\$ _____
Administrative	<u>0</u>	_____
Total	<u>0</u>	\$ <u>0</u> [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
- YES  NO hard copy
- YES  NO OTHER: \_\_\_\_\_

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

Are the following files computerized:

- |                                     |                                     |                                  |
|-------------------------------------|-------------------------------------|----------------------------------|
| <u>YES</u>                          | <u>NO</u>                           |                                  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Control Mechanism Issuance       |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Inspection and Sampling schedule |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Monitoring Data                  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | IU Compliance Status Tracking    |
| <input type="checkbox"/>            | <input type="checkbox"/>            | Other: _____                     |

Can IU monitoring data can be retrieved by:

- |                                     |                                     |   |
|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Industry name   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Pollutant type  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Industrial category or type   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | SIC Code  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | IU discharge volume   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Geographic location   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Receiving treatment plant (i.e.if > one plant in the system)  |
| <input type="checkbox"/>            | <input type="checkbox"/>            | Other (specify) _____   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Does the POTW have provisions to address claims of confidentiality?<br>[403.8(f) (1) (vii)] <i>Ordinance language only</i>  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Have IUs requested that data be held confidential?<br>How is confidential information handled by the Control Authority?<br><u>n/a</u>   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Are there significant public or community issues impacting the POTW's pretreatment program?<br><br>If yes, please explain: <u>Possible future nutrient limits may cause the City some problems.</u> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | 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

- |                          |                                     |  |
|--------------------------|-------------------------------------|--|
| <u>YES</u>               | <u>NO</u>                           |  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Have any problems in program implementation been observed which appear to be related to inadequate funding?<br>If yes, describe and show below the source(s) of funding for the program:<br>_____<br>_____ |

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

**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

<input checked="" type="checkbox"/> _____	Legal assistance	_____
<input checked="" type="checkbox"/> _____	Permitting	_____
<input checked="" type="checkbox"/> _____	IU inspections	_____
<input checked="" type="checkbox"/> _____	Sample collection	_____
<input checked="" type="checkbox"/> _____	Sample analyses	_____
<input checked="" type="checkbox"/> _____	Data analysis, review and response	_____
<input checked="" type="checkbox"/> _____	Enforcement	_____
<input checked="" type="checkbox"/> _____	Administration (inc. record keeping /data management)	_____

Does the Control Authority have access to adequate:

YES NO

If yes then list and if no, explain

<input checked="" type="checkbox"/> _____	Sampling equipment	Standard equip	_____
<input checked="" type="checkbox"/> _____	Safety equipment	"	_____
<input checked="" type="checkbox"/> _____	Vehicles	"	_____
<input checked="" type="checkbox"/> _____	Analytical equipment	"	_____

## SECTION II: PROGRAM ANALYSIS AND PROFILE

- I. POLLUTION PREVENTION *Basically, no changes since last audit in '07.*
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.
  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) 114,000 Ave. Process Flow (gpd) 58,000

Industry visited during audit: YES

Comments: Nylon, spandex & lycra yarns, dyeing. Facility changed yarn suppliers.  
O&G problems were solved by retrofitting their pretreatment system.

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) 130,000 Ave. Process Flow (gpd) 11,500

Industry visited during audit: YES

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

FILE #: 3 Industry Name Baldor File/ID No. #7  
Industry Address #1 R.S. Boreham Drive, 72830  
Industry Description Facility only assembles sub-fractional electric motors now.  
Industrial Category n/a 40 CFR n/a SIC Code: 3621,3566  
Ave. Total Flow (gpd) 2,400 Ave. Process Flow (gpd) 0

Industry visited during audit: YES

Comments: Facility ceased 40 CFR 433 core operation (phosphatizing) in 2/10.

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) 21,000 Ave. Process Flow (gpd) 1,500

Industry visited during audit: YES

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

## SECTION III: INDUSTRIAL USER FILE REVIEW

### A. Industrial User Characterization

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

### B. Control Mechanism (See Attech. A-1 for example permit)

1. Does the file contain an application for a control mechanism? (See Attech. A-2 for example)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>
If yes, what is the application date?	<u>8/06</u>	<u>4/08</u>	<u>12/08</u>	<u>10/08</u>	<u>    </u>
Does it ask for Pollution Prevention information?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>    </u>
2. Does the file contain a Permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>
Permit Expiration Date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>
Is a fact sheet included?	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>    </u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>
b. Expiration date?	<u>8/11</u>	<u>5/08</u>	<u>1/09</u>	<u>1/09</u>	<u>    </u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>
d. Appropriate discharge limitations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>
e. Appropriate self-monitoring requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>

Comments: 1) IU removed its metal finishing core operation and is now considered a non-significant, yet permitted IU; 2) IU changed from nitric to citric acid for passivation and has replaced their TCE solvent w/n-propyl bromide; 3) Solvents recycled for re-use; 4) Heat recovery; 5) Could be more comprehensive (see Attech. A-3 for example).

## SECTION III: INDUSTRIAL USER FILE REVIEW

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

Comments: 1) The permits' limit page should state whether the "24 hr composite" is flow or time proportioned.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

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

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
6. Were 40 CFR 136 analytical methods used? [403.8(f) (2) (vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
<u>Inspections</u> (See Attch. A-4 for example)					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
b. Date of last Inspection	<u>11/10</u>	<u>9/10</u>	<u>11/10</u>	<u>9/10</u>	<u>      </u>
9. Does the inspection report(s) include: [403.8(f) (2) (vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
d. Verification of production rates?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
f. Evaluation of pretreatment facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
g. Evaluation of self-monitoring equipment and techniques?	<u>✓</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>      </u>
h. Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
i. Manufacturing facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
j. Chemical handling and storage procedures?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>      </u>

Comments: 1. Could be more comprehensive

## SECTION III: INDUSTRIAL USER FILE REVIEW

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

Comments: 1) Inspection form could be more comprehensive regarding chemical (especially haz waste) handling procedures.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>      </u>
18. Has the IU developed (Evals were done. See Attch. A-5 for example) a Slug Control and Prevention Plan?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>✓</u>	<u>no</u>	<u>no</u>	<u>      </u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>--</u>	<u>1</u>	<u>--</u>	<u>--</u>	<u>      </u>
b. Did POTW respond to the spill?	<u>--</u>	<u>✓</u>	<u>--</u>	<u>--</u>	<u>      </u>

**E. Enforcement**

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>✓</u>	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
b. IU self-monitoring results?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>n/a</u>	<u>2</u>	<u>n/a</u>	<u>      </u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>3</u>	<u>4</u>	<u>0</u>	<u>0</u>	<u>      </u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>✓</u>	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>

Comments: 1) Facility slug loaded the POTW with flour and canola oil, but did not cause interference or pass-through; 2) Facility has ceased all CFR 433 core operations.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

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



# REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Clarksville NPDES #: AR0022187

Date of Audit: 11/8 - 11/10/10 Date entered into QNCR: 2/28/11  
(ASSESSMENT)

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

**SIGNIFICANT NONCOMPLIANCE (SNC)**

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

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Clarksville NPDES #: AR0022187

Name, address and phone number of industry:

Bright Harvest, 509 Taylor Rd., 479.754.6313

Type of industry: Sweet Potato Processing Date/Time of visit:  
11/9/10 / 8:45 a.m.

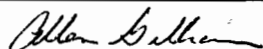
Industry contacts: Jeff Hannon-Mngr of QA/Compliance

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

Additional comments: Facility has not changed substantially any processing since the last audit. Only the outside pretreatment facility and sampling point were visited.

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

Visit conducted by: Gilliam/Smith/Rainey Date: 11/9/10



(signature of auditor conducting visit)

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

Control Authority: City of Clarksville NPDES #: AR0022187

Industry name: Bright Harvest Foods

Additional comments:

Site visit consisted of "picking up" wastestream at rear of actual process building where bulk solids 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, fries, etc.

After bulk (waste) 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 (2 aerators) lagoon. Two "fountains" aid in aeration and evaporation.

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

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

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

Canola oil now stored in ~3000 gallon upright steel tanks with secondary containment. Their used oil is also stored outside in a ~1000 gallon steel tank with secondary containment. Heating oil unit is also outside and contained. All outside storage looked to be well maintained and clean.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/9/10



(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: Assembly of elect. motors Date/Time of visit:  
and Gear Boxes 11/9/10 / 10:00 a.m.

Industry contacts: Bruce Phillips - Engineer/Safety Mgr.

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

Additional comments: Facility assembles sub-fractional AC & DC electric motors (up to about ½ horsepower) and gear boxes. \*IU has removed its core (phosphatizing) operation under CFR 433 (metal finishing) and will be classified by the City as a permitted, yet non-significant industry.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/9/10

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

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Additional comments: Raw material includes aluminum castings (outside produced), cast iron, steel, zinc, bronze and copper. Coolants, once spent, are hauled off-site. Scrap metal is sent off-site for recycle.

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

Assembly (not comprehensive description) of different sized motors includes the Cu wire windings, hot (1000 F) drop process for the rotors, press bearings/fans, insulation, varnish (windings) stators/oven cure, insert S.S. laminations, install "cans" around rotors and final placing of the end caps.

The laquer is heated to coat their windings. The heating unit for the laquer is in a secure place and includes a pressure relief valve.

Facility plans to install evaporators for their coolants to "cook off" the water to extend the coolants life and one to "cook off" the water in their used oil and re-use the oil to fuel their evaporators.

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.

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Visit conducted by: Gilliam/Smith/Rainey Date: 11/9/10



(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:  
 Hanesbrands Inc. 1904 Clark Rd. 479.979.3439

Type of industry: Hosiery Producer Date/Time of visit:  
 11/9/10 / 12:15 p.m.

Industry contacts: Cathy Stalcup - Plant Mgr & Eddie Shirley

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

\*City operates & maintains their pretreatment aeration basins

Additional comments: Facility makes various types of hosiery. The manufacturing side of the plant doesn't generate any wastewater and is mostly robotic sewing of outside vendor yarns.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/9/10



(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 production area.

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 dyes' mixing room has no floor drains and any spills would be caught in a sump.

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/dyeing machines.

After the dyeing operation, the hosiery is "washed", rinsed and then 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/dyeing flows to the outside activated biological pretreatment system (4 concrete, in-ground air diffusion basins [~11' deep] with RAS and 2 new parallel clarifiers). Waste oil caught by the skimmers is pumped to on-site totes and removed off-site for disposal.

City Pretreatment personnel very familiar with IU's operations.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/9/10



(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:

Passivation of SS Steel Tube Products

11/10/10 / 9:20 a.m.

Industry contacts: Steven Laneer/EHS.Supv. & Sid Kern - Customer

Support

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

\*Replaced Nitric with Citric Acid for passivation

Additional comments: Facility brings in SS tube products. 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. They no longer roll their own strip SS into tube shapes.

Chemicals storage (coolants, oils, ammonia, de-greasing solvents-"bromothane S") are stored outdoors with secondary containment for most. Rolls of raw SS tubing is also stored outside.

Visit conducted by: Gilliam/Smith/Rainey Date: 11/10/10

*Allen Dellen*

(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 drawn to desired ID and OD using a mineral spirit for lubrication. They're degreased with "bromothane S", rag wiped, then annealed at 2050 F in a disassociated NH<sub>3</sub> atmosphere (5 furnaces). Tubes are sent through a cooling system where the products are passed through larger diameter tubes immersed in water bath (therefore, non-contact cooling water which is discharged under their NPDES permit).

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 on a continual basis (~1,500 gpd). They no longer conduct ultrasonic pressure test.

Facility rep indicated he'd send an updated schematic and up-to-date process description to the City for their files.

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

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

Visit conducted by: Gilliam/Smith/Rainey Date: 11/10/10



signature of auditor conducting visit)

Attachment A-1

COMMISSIONERS



Christel Thompson

Eddie Lindsey

Steven Sosebee

Darrell Weathers

Matt Wylie

Hugh W. Harrison III, Gen. Mgr.

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

January 15, 2009

RE: Permit renewal

Dear Mr. Blunier

Please find enclosed the new permit for Greenville Tube. We, the POTW, will allow the flow increase to 15,000 GPD monthly average and 25,000 GPD daily maximum with the stipulation that if it causes problems at the POTW it will have to be lowered.

Please forward this information and paper work on to Amber Parham so she may include it in her files. Thank you for your time and cooperation on this matter.

Sincerely

Gregg Rainey  
Superintendent

Pam Smith  
Pretreatment Coordinator

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Clint Blunier  
Vice President & General Manager  
Greenville Tube Co  
P.O. Box 550  
501 South Montgomery St.  
Clarksville Ar 72830


Re: Issuance of Industrial User Permit to Greenville Tube Co. 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.

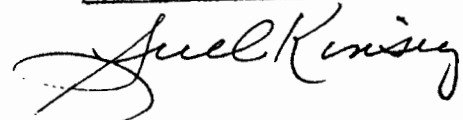
The enclosed issued permit 06 covers the wastewater discharged from the facility located at 501 South Montgomery St. into the City of Clarksville, and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit.

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 15<sup>th</sup> day of JAN., 2009

OFFICIAL SEAL  
SUE C. KINSEY  
Notary Public - Arkansas  
Johnson County  
My Commission Expires 01-20-12



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

Mr. Clint Blunier  
Vice President & General Manager  
Greenville Tube Co.  
P.O. Box 550  
501 South Montgomery  
Clarksville Ar 72830

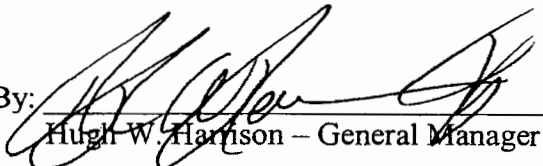
SIC 3356 / 3317

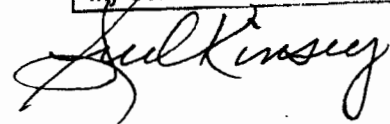
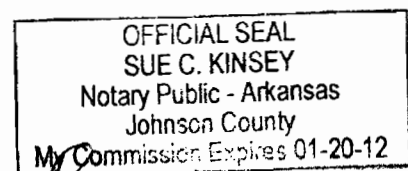
Is hereby authorized to discharge industrial wastewater from the above-identified facility into the City of Clarksville, Clarksville Light & Water sewer system in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit.

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 February 1 2009 and shall expire at midnight on January 31 2014.

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



PERMIT REQUIREMENTS  
CONTINUOUS DISCHARGE

SECTION A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

PROCESS WASTEWATER FLOWS;

Maximum Daily Flow	<u>25,000 GPD</u>
Monthly Average	<u>15,000 GPD</u>

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 Flow:	Daily Max	30 Day Average	
<u>Pollutant Parameter</u>	<u>One Day Max</u>	<u>30 Day Average</u>	<u>Type Sample</u>
Cadmium, (total) mg/1	0.69 * ***	0.26* ***	24 Hr. Comp.
Chromium (total), mg/1	2.77 *	1.71*	24 Hr. Comp.
Copper, (total) mg/1	3.38 *	2.07*	24 Hr. Comp.
Lead, (total) mg/1	0.69 *	0.43*	24 Hr. Comp.
Nickel, (total) mg/1	3.98 *	2.38*	24 Hr. Comp.
Silver, (total) mg/1	0.43 * ***	0.24* ***	24 Hr. Comp.
Zinc, (total) mg/1	2.61 *	1.48*	24 Hr. Comp.
pH S.U.	6.0-9.0	6.0-9.0	GRAB
Oil & Grease, mg/1	100	100	GRAB
Heat (Temp)	150F (65C) **	150F (65C)**	GRAB
Cyanide (total), mg/1	1.20 * ***	0.65* ***	GRAB
TTO, mg/1	2.13 ****		24 Hr. Comp.
TCE	Report *****		24 Hr. Comp.

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

\*\*Municipal Code 10.04.06 (E)

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

\*\*\*\* Industry has submitted an acceptable TOMP and is here by waved the TTO sampling.

\*\*\*\*\* During permit renewal; unless requested by POTW.

*A-1d*

All laboratory results shall be reported monthly to:

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

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

## SECTION B. GENERAL CONDITIONS AND DEFINITIONS

### 1. Severability

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

### 2. Duty to Comply

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

### 3. Duty to Mitigate

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

### 4. Permit Action

This permit may be modified, revoked and reissued, or terminated<sup>1</sup> for good cause including, but not limited to, the following:

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

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

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

5. Property Rights

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

6. Limitation on Permit Transfer

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

7. Dilution

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

8. Adverse Impact

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

## 9. Approval of Facilities

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

## 10. Definitions

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



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

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

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

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

#### 11. General Prohibitive Standards

The Industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State Hazardous Waste Authorities in writing of any discharge into the POTW of a substance which, if otherwise disposed of, would be a hazardous waste under 40 CFR 261. The Industrial User shall maintain documentation of the 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

1. Proper operation and maintenance

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

2. Duty to halt or reduce activity

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

3. Bypass of treatment

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

B. Bypass not exceeding limitations

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

C. Notification of bypass

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

D. Unanticipated bypass

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

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

SECTION D.  
MONITORING AND RECORDS

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

5. Additional Monitoring by the Permittee

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

6. Inspection and Entry

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

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

7. Retention of Records

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

8. Record Contents

Records of sampling information shall include:

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

- 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. 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

## SECTION F. PERMIT VIOLATIONS

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

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

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

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



In lieu of the requirement for monitoring of TTO, the Industrial User may certify that no 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 plan submitted to Clarksville Light and Water Company.

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

6-11-07  
Date of Signature

CORPORATE ACKNOWLEDGMENT

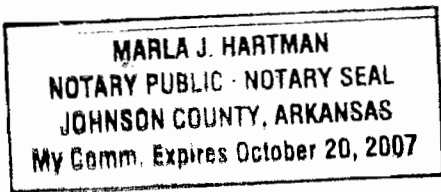
STATE OF ARKANSAS)  
COUNTY OF Johnson

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



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

1. FIRM NAME: Greenville Tube Company Date: October 13, 2008

ADDRESS: P.O. Box 550  
501 S. Montgomery

PHONE: 479-754-6500

2. North American Industrial Classification Code (NAICS) or Standard Industrial Classification (SIC) Code Number(s): 331210 3324 42317

3. List other environmental control permits held at this time: 161-AOP-R4, ARR000000, ARG250000

4. Quantity of Wastewater:

Discharged to	Average Daily	Maximum Daily
<u>Clarksville Sewer</u>	<u>(2006 Avg)</u>	<u>(1 Day)</u>
a. Process Wastewater from <u>Passivation</u> Operation	<u>6,018</u>	<u>21,104</u>
b. Domestic Wastewater from Sanitary Sewer	<u>7,500</u>	<u>10,000</u>
c. Non-contact Cooling Water	<u>N/A</u>	<u>N/A</u>
d. Total Wastewater Discharged to Public Sewage Works	<u>13,518</u>	<u>30,000</u>

List Periodic or Seasonal Variation: Higher discharges during heavy rainfall;  
lower discharges during dry periods.

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.

Rec  
11/3/08

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)	7.3	8.7
Oil & Grease, mg/l (2)	<5	<5
Temperature, (150 degrees F Maximum)	91.2	106.2
Copper	0.070	0.200
Lead	0.054	0.290
Silver	<0.007	<0.007
Zinc	0.096	0.74

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

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

- b. Priority Pollutants - Industries discharging any of the pollutants listed on attachment No. 1 must perform sampling and analyses necessary to develop information required to complete this section. In the spaces below, indicate the results of sampling and analyses for priority pollutants found in your wastewater.

Industries regulated by Federal Categorical Standards must perform (or for-new industries, have performed on a like facility) sampling and analyses in accord with 40 CFR 403.12. Additionally, the following information must be recorded and maintained at and by the industry: Person collecting the sample, the time, date and place of sample collection, the type of sample (grab, time weighted composite, flow weighted composite, etc.), the method of analysis, and the person performing the analysis, the EPA approved method of analysis, and all quality control data pertinent to the analysis. The statement at the bottom of this section must be signed by an authorized representative of the company familiar with the manufacturing or regulated processes.

A-2b

Priority Pollutant Number	Parameter	Concentration – mg/l	
		Average Daily (30 Day)	Maximum Daily (1 Day)
087	Trichloroethylene	N/A	0.0078
119	Chromium	2.009	16.0
124	Nickel	0.680	5.4
118	Cadmium	0.603	3.0

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.

A-2c

- a. Brief description of the nature of the manufacturing process or commercial activities at the plant.  
Raw stainless steel stock is drawn, degreased, annealed, straightened, sandblasted then cut to length
- b. General description of products produced by type, amount and rate of production.  
Stainless steel tubing is manufactured at a rate of 250,000 ft/week.
- c. General description of type and amount of raw material processed. Average and maximum per day.  
Welded and seamless tube hollows are processed at 20,000 lbs/day with a daily maximum of 25,000 lbs. Stainless Steel strip is processed at 3,000 lbs/day.
- d. Number of employees 218 Work hours per day 24 days per week 6
8. Hours of operation of plant and actual or proposed hours of operation of pretreatment system. Time and duration of discharges.  
Plant hours: Sunday 11:00 p.m. to Saturday 11:00 p.m.  
Continuous discharge.
9. Is your manufacturing or commercial operations subject to National Categorical Pretreatment Standards established under 40 CFR 403.5?  
Yes X No \_\_\_\_\_

A-2d

Applicable National Categorical Standards: 40 CFR 403; §433 Subpart A

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

Yes \_\_\_\_\_ No X

Remarks: Maximum Daily Flow (MDF) limit was exceeded during the periods of heavy rainfall during 2008.

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 X

Remarks: GTC respectfully requests that the MDF be increased to a a 30 day average of 15,000 GPD and a one day Max of 25,000 GPD.

12. If additional pretreatment and/or O & M are required to meet the National Categorical applicable discharge limitations, submit the shortest schedule by which your firm will provide such additional pretreatment.

- a. The schedule shall contain a list of the major events leading to compliance. The expected dates of completion of such events shall also be given.
- b. The completion dates of any two successive events shall not exceed nine months.
- c. Within 14 days after completion of each event, the Industrial User shall submit a progress report to the General Manager indicating:
  1. Date the event was completed.
  2. If the event is not completed as scheduled, the reason for the delay.
  3. The expected date of completion.
  4. Steps taken by the Industrial User to return to the established schedule.

A-2e

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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 CA Blum Date 10/30/08

Name of Signee Clint Blum Title of Signee VP/GM  
(Please Print) (Please Print)

Name and phone number of contact regarding permit information: \_\_\_\_\_  
Amber Parham 754-6500 ext. 234

CORPORATE ACKNOWLEDGMENT

STATE OF ARKANSAS

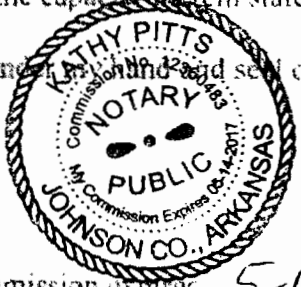
COUNTY OF Johnson

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_

Amber Parham 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 30 day of Oct, 2008



Kathy Pitts  
Notary Public in and for Johnson  
County, Arkansas

My commission expires 5-14-2017

A-2f

## Certification Statement

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

Signature

*CMBL*

Date

*10/30/08*



**FACT SHEET**

Industry Greenville Tube Inc.

Permit # 06

Address P. O. Box 550

Montgomery & Lucas

SIC 3356 / 3317

Clarksville AR. 72830

Contacts Name	Phone #	Title
<u>Amber Parham</u>	<u>479-754-6500</u>	<u>Environmental Manger</u>

Emergency Contacts	Name	Phone #	Title
	<u>Reggie Holsted</u>	<u>479-754-6500</u>	<u>Plant Manger</u>

Category Metal Finisher / Categorical

Max Flow 10,000 per day

Discharge Point North Of Rinse Tank. From front gate 454' 1' SE continue south 684'  
(4 th drive way on left) 183' 11" east to QA office door, then 15' 7" turn left 67' 8"  
Through door to plant, go east 8' 7" turn north (left) 86' 6", turn east (right) 22', turn  
North (left) 169' turn east 5' 5" this will put you at the sampling point, turn north 17' 8"  
Turn east 5' this is the discharge point.

Sampling Parameters Cd, Cr, Pb, Ni, Ag, Zn, pH, oil & grease, temp.

Description of Discharge Actives Metal tubing; tubes are drawn, annealed, degreased, straightened, passivated, cut to length, sand blasted, polished

Description of Stored Chemicals Trichloroethylene, Calumet, T26, T265, caustic soda, Citrisurf 2050 (citric acid), polishing oil, soda ash

Other Information

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CLARKSVILLE LIGHT AND WATER COMMISSION  
INDUSTRIAL USER INSPECTION REPORT

NAME AND ADDRESS OF INDUSTRIAL FACILITY:

Greenville Tube  
P.O. Box 550  
501 Montgomery St.  
Clarksville AR. 72830  
PHONE# 479-754-6500

DATE OF INSPECTION:

9-29-10

TIME OF INSPECTION:

0922

NAICS#

331491

SIC#

3356/3317

I.U. PERMIT #

06

INSPECTED BY:

Pam Smith / A. Rain

Clint Blunier Plant Manager 479-754-6500  
RESPONSIBLE OFFICIAL TITLE PHONE NO.

Slade Lanier EHS Supervisor 479-754-6500 ext 234 [Signature]  
FACILITY REPRESENTATIVE TITLE PHONE NO. SIGNATURE

Pam Smith Pretreatment Coordinator 479-754-7929 Pam Smith  
CL&W REPRESENTATIVE TITLE PHONE NO. SIGNATURE

INDUSTRY TYPE /CATEGORY Metal Finisher / Categorical

NATURE OF OPERATION Metal Tubing

PURPOSE OF INSPECTION Annual

LAST OCCURRENCE OF NON-COMPLIANCE 9-25-09 ph 5.65

NUMBER OF EMPLOYEES 150 WORK HOURS PER DAY 24 WORK DAYS PER WEEK 6

Aug.  
WATER SOURCE CITY 647200 GAL. WATER USAGE SANITARY 17000 GAL.  
39,209

PROCESS WATER 1,245 GAL. per clay

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

RAW MATERIALS:

stainless steel, steel hollow tubing, stainless steel strips

DATE OF INSPECTION: 9-29-10

TIME OF INSPECTION: 0922

INSPECTED BY: D. Smith / A. Rain

IU Name: Greenville Tube

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

polished sludge is water based

PRODUCTS PRODUCED AND PROCESS DISCRPTION:

metal tubing, tubes are drawn, annealed, degreased, straightened cut to length, sandblasted, polished + passivated

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

(A) In-house environmental teams RCRA Dot - Training  YES  NO

(B) Incentive programs for employee input on recycling, process improvement of other pollution prevention activities  YES  NO

(C) What are you doing to conserve water?  
artesian well, recirculate and reuse as much water as possible

~~(D)~~

(D) What are you doing to conserve energy?  
recycling program, cans, paper, cardboard all plastic including plastic bottles, metals polishing sludge is sent to alpha and Omega

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

Mechanical, Tubro Meter

DATE OF INSPECTION: 9-29-10

TIME OF INSPECTION: 0922

INSPECTED BY: D. Smith / J. Rain

IU Name: Greenville Tube

LOCATION

East rinse tank.

CONFIRM ACCURACY

currently using back up meter; original in for calibration.  
calibrated 8-8-09

BEST MANAGEMENT PRACTICES

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

Hazardous chemical training for all employees; has an on going recycling program, includes recycling all mercury lamps, wire, card board paper, plastic, ect

Spills shall be cleaned up expeditiously and not allowed to enter the waste treatment system or outfalls. Any other out of the ordinary activities shall be performed in a manner to prevent pollution from entering the POTW

PRETREATMENT FACILITIES OPERATION AND MAINTENANCE:

(A) Standby power or other equivalent provisions provided generator  YES  NO

(B) Adequate alarm system for power or equivalent failures on rinse tank for pH  YES  NO

(C) Sludges and solids adequately disposed  Yes  No

Received on 10-5-10 from Glade

(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 work instructions  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

computer & maintenance program for employes to enter work request

DATE OF INSPECTION: 9-29-10

TIME OF INSPECTION: 0922

INSPECTED BY: Dan Smith / J Rj

IU Name: Greenville Tub

RECORDS AND REPORTS:

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

LABORATORY PROCEDURES:

(A) Does the industry perform any lab analysis itself?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> n/a
(B) Sampling locations. <u>inside passwater rinse tank</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> n/a
(C) Sampling / preservation technique <u>Bottles preserved by EEG</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> n/a
(D) Observation of IU self monitoring procedure	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> n/a
(E) EPA approved analytical testing procedures used	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> n/a
(F) If alternate analytical procedures are used, proper approval has been obtained	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> n/a
(G) Quality control procedures used	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> n/a
(H) Commercial Laboratory used	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> n/a

Lab Name EEG

Lab Address 220 North Knoxville Suite 200  
Russellville AR. 72801

Phone 479-968-6767 or 1-800-530-7968 Fax 479-968-1956  
Contact Mike Cole + Keith

Parameters tested for by commercial lab.

cadmium, Chromium, Copper, Lead, Nickel, Silver, Zinc,  
pH, Temp, Oil + Grease, Cyanide, EEG chad Incl. K2Cr2O7

DATE OF INSPECTION: 9-29-10

TIME OF INSPECTION: 0922

INSPECTED BY: B. Smith / S. Raj

IU Name: Greenville Tube

TOXIC ORGANICS MANAGEMENT PLAN:

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

Goes through air stripper, passivation rinse tank, then discharged to city sewer; pH adjustment when needed with soda ash

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

calumet 142F 50-200 gal; T26-R ink 5 gal max stored in 2 liter bottles; T26S make up oil 2 gal; caustic soda 1-2 55 gal drums, for clean out once or twice per year; citric acid 1-3 55 gal. drums; approx 3-6 55 gal drums (for drawing); polishing oils; soda ash 15-20 40-50 lbs bags; N-propyl bromide 8000 gal storage tank 4-5 55 gal drums to fill; 1-2 55 gal drums g. lub oil or solvents

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

contain with spills kits, notify city + proper authorities; hazardous and non hazardous spill kits on hand

(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 worker training, hazardous and communication training, preventative maintenance program to prevent spills and leaks, installing drip pans  
9 employees have 40 hours training in Haz Waper  
3 employees including Glade have RACT and OOT training

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

all chemicals are stored in virgin materials area. no floor drains in this area and building has a slope.

DATE OF INSPECTION: 9-29-10

TIME OF INSPECTION: 0922

INSPECTED BY: Dan Smith / AR

IU Name: Greenville Tube

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

~~ICE~~ hauled out by Fort Transport  
waste hauled out by Kinco  
US waste and Alpha Omega

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

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

Pollution Prevention Plan

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

Reason: Received new plan on 11-18-09 Received up dated SWPPP on 10-5-10

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

Comments: Greenville Tube personal has done an excellent job cleaning up after the spill on 8-30-10

IU inspection summary

Slade was very informative during our inspection

Recommended action:

warn at this time,

AAT



DIVISION OF PUBLIC WORKS  
INDUSTRIAL PRETREATMENT SECTION

SLUG/SPILL EVALUATION CHECKLIST

SIU NAME: Greenville Tube

PERMIT NO.: 06 CONTACT: Amber Pacham

1. SPILL PLAN

- a. Type on file: (PIPP, SPCC, TOMP, Contingency): TOMP Date: 2/09
- b. Number of Spills in last 3 years: 0 9/09  
put in place

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

3. MANUFACTURING PROCESSES

- a. Process solutions in tanks

<u>Chemical Solution Name</u>	<u>Location (attach sketch)</u>	<u>Process Tank Size (in gallons) ; in solution</u>
<u>Citric Acid</u>	_____	<u>1100 gal cons.</u>
<u>FCF NPB</u>	_____	<u>4400 lbs</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

MANUFACTURING PROCESSES - Cont'd

- b. Do process solution tanks overflow? Yes \_\_\_\_\_ No
- If so, is overflow liquid contained? Yes \_\_\_\_\_ No \_\_\_\_\_
- Describe containment: float on tank to prevent over flow
- Condition of containment: Good  Fair \_\_\_\_\_ Poor \_\_\_\_\_ N/A \_\_\_\_\_
- c. Drains/Trenches: Yes \_\_\_\_\_ No  Routed to: N/A
- Distance from Process Tanks (in feet): N/A
- d. Spill Potential (High, Medium, 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 verified
- 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 with 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":

<u>Type of Waste</u> (Examples: waste solvent, waste oil, pretreatment sludge, etc.)	<u>Quantity per Year</u> <u>Generated</u>	<u>Disposal Method</u>
<u>TCF</u>	<u>16,465 lbs</u>	<u>contract Univar</u>
<u>waste oil</u>	<u>1,484</u>	<u>Rinco</u>
<u>solvent</u>		

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

in containment structures

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

RECOMMENDATIONS

- a.  Existing Spill Plan adequate, Combined Slug/Spill Control Plan not needed.
- b.  no New Slug/Spill Control Plan required
- c.  no Add slug provisions to existing Spill Plan
- d.  no Other deficiencies to be corrected: \_\_\_\_\_  
\_\_\_\_\_
- e.  No Slug/Spill Control Plan is necessary at this facility.
- 

Signature: \_\_\_\_\_

*Pam Smith*

Date: \_\_\_\_\_

*11-18-09*

**Compliance Monitoring Information**

Compliance Activity Type: Inspection/Evaluation  
 \* State: AR  
 Compliance Monitoring Activity Name: Clerksville  
 Compliance Monitoring Type: AFO Defined  
 AFO Designation  
 Aerial Photography  
 Audit  
 Audit (IU)

**Program System Acronym Identifier** AR0022187   
 Facility Site Name Address FRS ID

**Compliance Monitoring Dates**

Planned Start Date: 11/8/10 Actual Start Date: 11/8/10  
 Planned End Date: 11/10/10 Actual End Date: 11/10/10

**Statutes and Sections Information**

Federal Statutes: CWA - Clean Water Act  
 \* Programs:  
 NPDES - Post Administrative Penalty Case (Settlement)  
 NPDES - Pretreatment  
 NPDES - Sanitary Sewer Overflow (SSO)  
 NPDES - Section 308 Information Requests  
 NPDES - Sludge/Biosolids  
 State Statute:

\* Compliance Monitoring Action Reason:  
 Agency Priority  
 Citizen Complaint/Tip  
 Core Program  
 For Cause  
 Random Inspection  
 \* Compliance Monitoring Agency Type:  
 State Contractor  
 State - Using Federal Credential  
 State  
 Regional  
 Other Federal  
 Compliance Monitoring Agency Name:  
 If State, Local or Tribal lead, did EPA Assist?: No  
 Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity?: State  
 If Joint, what was the purpose of the participation of the other party?  
 Which party had the lead?

**Government Contacts**

Affiliation Type	First Name	Last Name	Phone	Office	Organization
SIC Codes:	Codes		Priorities		
NAICS Codes:			OECA National Priority: 2009 - (CA Only) - Air Toxics - Flares 2009 - (CA Only) - Air Toxics - LDAR 2009 - (CA Only) - Air Toxics - Surface Coating 2009 - (CA Only) - Financial Assurance 2009 - (CA Only) - MP - Mining Regional Priority: 2009 - Region 06 - Air Toxics Major Sources (O & G) 2009 - Region 06 - Brine Spills from Oil & Gas Operations 2009 - Region 06 - CD Implementation 2009 - Region 06 - Minor Wastewater Collection & Treatment System 2009 - Region 06 - Petroleum Refining		

**Media Monitored**

Media Monitored:  
 Compliance Monitoring Media Indicator  
 Multimedia Indicator:

**Compliance Monitoring Information**

Number of Days Physically Conducting Activity: 3  
 Number of Hours Physically Conducting Activity: 20  
 Compliance Monitoring Action Outcome:  
 Compliance Monitoring Rating Code:

**Compliance Monitoring Comments**

Compliance Monitoring Comments: 4 IU site visits performed



**Special Programs**  
Pretreatment

**Significant Industrial Users (SIUs)**

SIUs:

SIUs Without Control Mechanism:

SIUs Not Inspected:

SIUs Not Sampled:

SIUs in SNC with Pretreatment Standards:

SIUs in SNC with Reporting Requirements:

SIUs in SNC with Pretreatment Schedule:

SIUs in SNC Published in Newspaper:

SIUs on Schedules:

Violation Notices issued to SIUs:

Administrative Orders issued to SIUs:

Civil Suits Filed Against SIUs:

Criminal Suits Filed Against SIUs:

**Local Limits**

Date of Most Recent Technical Evaluation for Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

POLLUTANTS

**Removal Credits**

Removal Credits Application Status:

Date of Most Recent Removal Credits Approval:

Removal Credits:

POLLUTANTS

**Acceptance of Waste**

Acceptance of Hazardous Waste:

Acceptance of Non-Hazardous Industrial Waste:

Acceptance of Hauled Domestic Wastes:

**Deficiencies**

Deficiencies Identified During IU File Review:

Control Mechanism Deficiencies:

Legal Authority Deficiencies:

Deficiencies in Data Management and Public Participation:

Deficiencies in Interpretation and Application of Pretreatment Standards:

Inadequacy of Sampling and Inspections:

Adequacy of Pretreatment Resources:

**Categorical Industrial Users (CIUs)**

CIUs:

CIUs in SNC:

**Penalties**

Dollar Amount of Penalties Collected: \$

Industrial Users (IUs) from which Penalties have been collected:

**Other Information**

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Violation of IU Schedule for Remedial Measures:

Formal Response to Violation of IU Schedule for Remedial Measures:

**Annual Frequency**

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling: