ADEQ
ARKANSAS
Department of Environmental Quality

October 30, 2006

Belva Plumlee
Wastewater Plant Manager
City of Bentonville
1901 NE "A" Street
Bentonville, Arkansas 72712

Re: City of Bentonville (NPDES Permit #AR0022403) Pretreatment Program Audit/Municipal Pollution Prevention Assessment

Dear Ms. Plumlee,

Please find enclosed the finished report for the audit/assessment conducted June 20 - 22, 2006. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the recommendations and required actions. Please respond in writing within thirty (30) days to the audit findings with proposed actions.

The City appears to have personnel knowledgeable and interested in both the Pretreatment and Pollution Prevention Programs and their implementation. Many of the audit/assessment recommendations are meant to aide your Programs to further evolve in achieving the Clean Water Act's objectives to eliminate discharge of pollutants to the environment.

It's strongly encouraged your Pretreatment personnel be allowed the time to read and comprehend the City's Program to make the necessary modifications to be current with the newly revised 40 CFR 403, current procedures and incorporate more Pollution Prevention activities into their daily routine.

It was a pleasure working with your staff during the audit and becoming more familiar with Bentonville, its industries and Pretreatment Program. If there are further questions, please feel free to contact this office.

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist

cc: Lee Bohme/EPA 6WQ-PP
Frank Esry/ADEQ Inspector Supervisor
Dennis Benson/NPDES Enforcement Manager

PRETREATMENT AUDIT REPORT

FOR THE CITY OF BENTONVILLE, ARKANSAS

NPDES PERMIT #AR0022403

OCTOBER 27, 2006

PREPARED BY:

ALLEN GILLIAM

STATE PRETREATMENT COORDINATOR

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

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LIST OF ATTACHMENTS

A) INTRODUCTION

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

With Pollution Prevention (P2) being integrated into Pretreatment Programs, assessments of these Cities' P2 projects and programs will be made.

An audit/assessment was performed June 20 - 22, 2006, of the Pretreatment Program implemented by the City of Bentonville, Arkansas. Participants included:

Allen Gilliam	ADEQ / Pretreatment Coordinator
Nancy Busen	City of Bentonville / Pretreatment Coordinator

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Bentonville'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 of Bentonville's Pretreatment and P2 Programs in controlling industrial discharges and elimination or reducing toxic pollutant discharges.

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

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

Bentonville's Pretreatment Program was originally approved 11/28/84. Program modifications were submitted, approved and incorporated into their NPDES permit on 10/6/95 and again on 12/6/04. The modifications included program narrative revisions, evaluation of MAHLS, incorporation of an ERP and Pretreatment Ordinance revisions.

Bentonville's POTW processes include extended aeration/oxidation ditches; nitrification/denitrification; gravity sludge thickeners; belt press, final clarification, chlorination and UV disinfection prior to its discharge to Town Branch Creek.

Its design flow is 4 MGD but averages about 4.1 MGD with SIU (0 categoricals) contributions of 0.72 MGD making up about 17.6% of the average daily flow. Approximately 282 dry tons/year of Class A sludge is land applied and approximately 804 dry tons/year of compost is given away to the

public.

There has been no pattern of toxicity observed in the POTW's effluent but, survival and growth for the P. Promelas indicated NOEC at 54% and 43% respectively during the first quarter of '05.

The audit/assessment consisted of informal discussions with Bentonville's Pretreatment personnel, examination of industrial user files, pretreatment records, and site visits at four (4) of their five (5) non-categorical permitted industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included in Attachment(s) A.

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 Bentonville. 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 Bentonville's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the City's approved program will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1) Under ***40 CFR 403.8(f)(2)***, "The POTW shall develop and implement procedures to ***(i)*** identify and locate all possible industrial users which might be subject to the Pretreatment Program".

Although, evidence was provided indicating recent ('04 & '05) IU surveys were sent to select industry/business sectors (see page 7 of checklist), the city must conduct and document a comprehensive non-domestic survey to be compliant with the above citation. To name other potential sectors possibly subject to the city's Pretreatment and Pollution Prevention Programs include the local hospital, health care facilities, chiropractors, veterinarians, pharmacies, auto repair/paint shops, screen and news printers, machine shops, commercial pesticide companies, etc. in the next survey.

Surveys should be tailored to fit the various business sectors. Doctor's offices, hospitals, and photo processors for instance, should be asked about their X-ray/photo developing equipment maintenance and recordkeeping procedures. Auto repair and maintenance facilities should be asked about solvent, paint and other toxic materials disposal methods.

Questions regarding Pollution Prevention and best management practices as well as environmental management systems should be included on all questionnaires.

The listing will also help facilitate identifying and locating new categoricals under development by EPA as well as those business/industry groups with Pollution Prevention opportunities.

Those facilities that answer "discharge to septic system" should also be placed in a suspense folder for future use, possibly by ADEQ's State permitting branch.

It appears more time should be allowed for Pretreatment personnel to complete this endeavor. And, it was not apparent that much progress has been made toward incorporating Pollution Prevention activities into the City's Pretreatment Program.

2) Under ***40 CFR 403.8(f)(2)(iii)***, "Notify Industrial Users identified under paragraph (f)(2)(i) of this section, of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act."

Notify the city's industrial users of the recent "streamlining" revisions to the National Pretreatment Regulations in 40 CFR 403 (http://cfpub.epa.gov/npdes/home.cfm?program_id=3).

3) Under ***40 CFR 403.12(p)*** "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 part 261....etc".

The city should notify its hazardous waste generators (current ADEQ list provided during audit) of this reporting requirement. Do not leave out those facilities that may not be knowledgeable of their generator status. Hospitals, dentists, chiropractors, pharmacies, long term health clinics, the smaller photo finishing businesses are all "probables" on that list to be notified.

4) Under ***40 CFR 403.12(l)*** "*Signatory requirements for industrial user reports.* The reports required by paragraphs (b), (d), and (e) of this section shall include the certification statement as set forth in § 403.6(a)(2)(ii), ...etc".

Not all IU reports had this certification statement. The city must notify and require this statement to be included.

5) Under ***40 CFR 403.8(f)(1)(v)*** "Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by Industrial Users, compliance or noncompliance with applicable Pretreatment Standards and Requirements by Industrial Users."

The City's inspection report indicated Kennametal was not a hazardous waste generator (Attach A-5e) while the facility's permit application (Attach A-3t) and ADEQ's haz waste list DID show them to be a conditionally exempt generator. City Pretreatment personnel must be more

cognizant of information they're collecting during a comprehensive inspection. If the IU's status has been changed to a "non-generator" because of cessation of the haz waste generating process, they should have notified the City, ADEQ and EPA of this.

6) Under the current ***40 CFR 403.8(f)(2)(vi)*** "Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User. For purposes of this subsection, a Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions. The results of such activities shall be available to the Approval Authority upon request. Significant Industrial Users are required to notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge. If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

(A) Description of discharge practices, including non-routine batch Discharges;

(B) Description of stored chemicals;

(C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under § 403.5(b) with procedures for follow-up written notification within five days;

(D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response."

While the City's current inspection form does include questions whether the facility has a slug control plan, floor drains, chemical storage areas, containment, etc, an evaluation whether there was the potential exists for a slug discharge needs to be addressed.

7) Remove the paragraph in Kennametal's permit, Part 2.A. (Attach A-2d) where it references the old Metal Products and Machinery Rule proposed requirements as this is obsolete.

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

1) Recommend sending all SIUs a copy of the reporting requirements located in 40 CFR 403.12. One provision, the notification of changed discharge requirement is often overlooked by many IUs and control authorities throughout the State. Additions and/or modifications to pretreatment/process

equipment and raw material may constitute such changes requiring notification in the form of updated schematics and other detailed information. Current wastewater generating process flow diagrams and raw material/product "flow" should be contained in the facility's "active file", possibly attached to its fact sheet.

2) Recommend including more Pollution Prevention, Best Management, Source Reduction, etc. questions on IU permit applications.

3) Also consider including in existing SIU permits: annual Pollution Prevention performance reports with the IUs reporting reductions in lbs of toxics released, money saved because of better management practices, water and energy savings, etc. along with a complete chronological "history".

4) Recommend strengthening IU inspection reports to include more comprehensive questions/answers about chemical handling procedures, storage areas, pretreatment equipment, manufacturing processes, raw material, pollution prevention activities, environmental management systems, etc. Review of EPA's "IU Inspection and Sampling Manual for POTWs" dated 4/94, was suggested for additional ideas of a comprehensive inspection report.

Remarks during the audit made to the City's coordinator were if ALL this audit's checklist items (Section III, part D.9.a. through D.9.q.) could be "checked off", one could feel comfortable that a comprehensive inspection had been conducted. Once the City feels they have a comprehensive form in place, it could be formally typed up, filed and used as a template for the next year's inspection without having to spend time to hand re-write it. One of the first questions should be added and asked, "Have there been any process, raw material, etc. changes since the last inspection?" Or, "Are there are any anticipated changes in the near future?"

5) Recommend developing a Program section or procedures manual for various Program implementation activities. Sampling techniques at individual IUs, handling/log-in procedures of Pretreatment reports and data, pre-inspection procedures, etc., may be well known to current employees, but it would make common sense to have these activities briefly summarized in writing for ease of educating new employees.

6) Recommend re-evaluating and submitting revised MAHLs and (if necessary) re-allocate TBLLs. Now that Tysons has ceased operations and the population of the City has increased substantially since the last evaluation, it would be prudent if the City accomplished this task.

7) Recommend the City Council pass a resolution endorsing Pollution Prevention (see EPA's "Municipal Pollution Prevention for Pretreatment Programs" provides a good example).

8) Recommend including pollution prevention audits as part of your Enforcement Response Plan's "Guide" as another enforcement tool.

9) Recommend including reporting requirements in Walmart's TMG permit for other metals of

concern, similar to those you have in Kennametal's.

10) Recommend holding an annual "Industry/business Awareness Day" to increase outreach and education regarding the basics of the City's Pretreatment Program and Pollution Prevention opportunities. Information disseminated could vary from the basic Pretreatment prohibitions to Local Limits to pharmaceuticals. Awards could be given to those industries that have completed a pretreatment year with no violations or have shown success with their pollution prevention activities. The local newspaper should be included in this informal public outreach.

11) Recommend using as closely as possible the "Clean Sampling" (EPA's Method #1669) techniques to guard against contamination, especially with the treatment plant's effluent.

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

Make necessary Pretreatment Program revisions to be current with the minimum required ***40 CFR 403*** streamlining revisions.

* * * * * * * *

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Bentonville NPDES #: AR0022403
Mailing address: 1901 NE "A" Street, Bentonville AR 72712

Permit Signatory: Belva Plumlee Title: WW Plant Manager
Telephone: 479.271.3160 FAX NUMBER: 479.271.3163

Pretreatment Contact: Nancy Busen Title: Lab/Pretreatment Coord.
Address: same Mike Roberts (Asst. Manager)
Telephone: same
E-address nbusen@bentonvillear.com
Pretreatment program approval date: 11/28/84

Dates of approval of any substantial modifications: 10/6/95 and 12/6/04

Month Annual Pretreatment Report Due: November

Pretreatment Year Dates: 11/1 - 10/31 Date(s) of Audit: 6/20-22/06 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	Pretreatment Coord/ADEQ	501.682.0625

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
*Nancy Busen	Pretreatment Coordinator	479.271.3160

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	11/04	Needed an updated IU survey
PCI	6/04	No violations indicated but recommendations included more info on inspection forms

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: N/A

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

. . . . . .

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

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0022403	Bentonville Wastewater	1/1/04	12/31/08

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Bentonville Wastewater
Location Address: 1901 NE A Street, 72712

Treatment Plant Wastewater Flow: Design- 4.0 MGD; Actual (Average)- 4.1 MGD

Sewer System: 100 % Separate; 0 % Combined, # of CSOs ?

Industrial Contribution to this Treatment Plant

# of SIUs : 5* # of CIUs : 0
Industrial Flow (mgd): 0.72* Industrial Flow (%) : 17.6* %
**Tysons ceased discharge 2/06 so these numbers reflect "old" numbers*

Level of Treatment		Type of Process(es):
Primary	✓	extended aeration/oxidation ditches;
Secondary	✓	nitrification/denitrification; gravity
Tertiary		thickner/belt press; clarification

Method of Disinfection: chlorination/UV disinfection

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Town Branch Creek

Receiving Stream Classification: Segment 3J of Ark River Basin

Receiving Stream Use: fishable/swimmable; primary/secondary contact

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

Method of Sludge Disposal:		Quantity of Sludge:
✓	Land Application	282 dry tons/yr.
	Incineration	dry tons/yr.
	Monofill	dry tons/yr.
	Mun. Solid Waste Landfill	dry tons/yr.
	Public Distribution	dry tons/yr.
	Lagoon Storage	dry tons/yr.
✓	Other (compost)	804 dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals

SECTION I: GENERAL INFORMATION

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

YES NO

✓ ___ Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: ADEQ
Issuance Date: same
Expiration Date: same

List pollutants that are specified in current sludge permit:
Reference to CFR 503 parameters and loading rates

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?) 1st Quarter failed P.Promelas Survival & growth NOEC 54% & 42% respectively. Retest in April NOEC's for survival @ 31% & reproduction 99%

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	0	
Priority **	1	1	0	
Biomonitoring		1		
TCLP			1	
Other:				

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

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES	NO	
✓		Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]
✓		Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.

1. Modifications: N/A

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
12/6/04	MAHL (includes attachments)	12/6/04

2. Modifications in Progress: N/A

Date Requested	Nature of Modification

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: 11/28/84 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 3/25/03
Date of most recent Pretreatment Program modification approval: 12/6/04
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:

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

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

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	City of Centerton	0	0	Contract (dated 7/93)

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

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

Briefly describe other problems: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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			

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)] **dental survey done in '04 & '05. Food service & funeral homes survey in '05.*

___ ✓ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?

___ ✓ Does the Control Authority have written procedures to update its ndustrial 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^2 activity and the distribution of P^2 reference materials to the IUs which qualify?

What methods are used to update the IWS:

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

How often is the survey to be updated? ongoing

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

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?

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. 0 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 4 Noncategorical SIUs
d. 6 Other regulated nonsignificant IUs (Describe) septage haulers

10 TOTAL of a. + d.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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(t)(1)(i-ii)]

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

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

YES NO
___ ✓ Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

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

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

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

IU NAME	PERMIT EXPIRATION DATE

YES NO
✓ ___ Does the Control Authority accept trucked septage wastes?
___ ✓ Does the Control Authority accept other trucked wastes?
✓ ___ Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following: **See Attachment A-1 for example.*

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

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

Pollutant	Limit
*general & specific prohibitions	

Describe the discharge point(s) (including security procedures):
at discharge point at POTW and witnessed by plant personnel

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

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

Pollutant	Limit
N/A	

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?

5/91 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 MAHL	New MAHL	Reason for Change

SECTION II: PROGRAM ANALYSIS AND PROFILE

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)] **from '03 ordinance*

	Headworks Analysis Completed?		Local Limits Needed?		MAHL Adopted?		MAHL Numerical Limit Adopted (lb/day)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓			✓	✓		0.40
Cadmium (Cd)	✓			✓	✓		0.30
Chromium-Total	✓			✓	✓		7,13
Copper (Cu)	✓			✓	✓		2.85
Cyanide (CN)	✓			✓	✓		1.12
Lead (Pb)	✓			✓	✓		3.27
Mercury (Hg)	✓			✓	✓		0.007
Molybdenum (Mo) *	✓			✓	✓		0.36
Nickel (Ni)	✓			✓	✓		2.38
Selenium (Se) *	✓			✓	✓		0.48
Silver (Ag)	✓		✓		✓		1.28
Zinc (Zn)	✓			✓	✓		8.55

* - *If necessary for the sludge disposal option chosen.*

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?		MAHL Adopted?		MAHL Numerical Limit Adopted (lb/day)
	Yes	No	Yes	No	Yes	No	
BOD	✓		✓		✓		12,009
TSS	✓		✓		✓		8,340
Ammonia-N2	✓			✓	✓		731.4

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ 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 will be used for local limits for each pollutant that has a local limit in-place?

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

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

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	N/A	1/year	
Other SIUs	1	1/year	
Sampling:			
CIUs	N/A	1/year	
Other SIUs	10-12	1/year	Surcharge purposes
Reporting:			
CIUs	N/A	2/year	
Other SIUs	12	2/year	"
Self-Monitoring:			
CIUs	N/A	2/year	
Other SIUs	12-52	2/year	(Kraft)

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

Does the Control Authority routinely split samples with industrial personnel:

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

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

	Analytical Method*	Name of Laboratory
Metals	flame & furnace	American Interplex
Cyanide	spectrophotometric	"
Organics	GS/MS	"
Other	Conventional NH3, Nitrates & Phos	POTW

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.

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe: they rely on State's certification process and requires the IUs to have a QA/QC procedure with their contract labs via permit language & participates in state's DMR cert. process getting standards from a chemical process group

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

1 wk Conventionals
1-3 wk Metals
1-3 wk Organics

___ ✓ Is there an established protocol clearly detailing sampling location and procedures? **Currently putting together pictures of sampling sites*

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

If yes, explain: _____

_____

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: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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)(vii)

✓ ___ 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

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

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

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

_____ Imprisonment
✓ Termination of Service
_____ Other: _____

Describe any problems the Control Authority has experienced 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: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

___N/A___ If no, does the Control Authority conduct all of the monitoring?

✓ ___ Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	No
N/A					

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

#	%	
0	0	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [WENDB-MSNC]
0	0	Reporting requirements [WENDB-PSNC]
0	0	Pretreatment compliance schedule [WENDB-SSNC]

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

YES NO

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

Has the Control Authority experienced any of the following:

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount
Civil	0	$ 0
Administrative	0	$ 0
Total	0	$ 0

[WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

YES NO

✓ ___ computerized
✓ ___ hard copy
___ ___ OTHER: _____

Are the following files computerized:

YES NO

✓ ___ Control Mechanism Issuance
___ ✓ Inspection and Sampling schedule
✓ ___ Monitoring Data
✓ ___ IU Compliance Status Tracking
___ ___ Other: _____

Can IU monitoring data can be retrieved by:

✓ ___ Industry name
___ ✓ Pollutant type
___ ✓ Industrial category or type
___ ✓ SIC Code
___ ✓ IU discharge volume
___ ✓ Geographic location
___ ✓ Receiving treatment plant (i.e.if > one plant in the system)
___ ___ Other (specify) _____
✓ ___ Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]
___ ✓ Have IUs requested that data be held confidential?

How is confidential information handled by the Control Authority?
since there have been no requests a procedure has not been developed

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

If yes, please explain: new regional POTW under construction will cause an increase in taxes, sewer rates & possibly revisions to their MAHLs

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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
estimated at one (1)

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

If yes, describe and show below the source(s) of funding for the program:
surcharges go back into the city's general operating fund from which program expenses are drawn.

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

YES	NO	
✓	___	Is funding expected to continue near the current level? If no, will it:

Increase ____ or Decrease ____
If no, describe the nature of the changes:

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

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

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	Isco - 3 portable and 3 bubbler and area velocity flow meters
✓	___	Safety equipment	ventilators and gas detectors
✓	___	Vehicles	one truck
✓	___	Analytical equipment	AA flame which is still not in use

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):

Inspections include questions about waste minimization.

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

N/A

3. Has the POTW implemented any kind of public education program? If yes, describe:

Plant tours for school kids.

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? *Not recently*
If yes, which of the "Guides to Pollution Prevention" were used? _____

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Kennametal File/ID No. 05-01
Industry Address 1602 E. Central
Industry Description Mfg. of machine tool extrusion dies & tool accessories
Industrial Category N/A 40 CFR N/A SIC Code: 3545
Avg. Total Flow (gpd) 8680 Avg. Process Flow (gpd) 1200
Industry visited during audit: YES Tim Blair 479-621-4726

Comments:

FILE #: 2 Industry Name Fuji Color Processing File/ID No. 04-05
Industry Address 1107 S.E. 10th Street, 72712
Industry Description Photo processing
Industrial Category N/A 40 CFR N/A SIC Code: 7384
Ave. Total Flow (gpd) 29850 Ave. Process Flow (gpd) 26850
Industry visited during audit: YES 479-464-2120

Comments: Application said 24,000 units/day avg., 10,000 lb/yr Ag flake, 1,000 lb/yr Ag sludge and 1,000 lb/yr resin beads sent to refinery

FILE #: 3 Industry Name Walmart TMG File/ID No. 03-01
Industry Address 6301 SW Regional Airport Road
Industry Description Truck maintenance and wash facility
Industrial Category N/A 40 CFR N/A SIC Code: 4173
Ave. Total Flow (gpd) 38000 Ave. Process Flow (gpd) 38,000
Industry visited during audit: YES Randall Stafford

Comments:

FILE #: 4 Industry Name Kraft File/ID No. 02-05
Industry Address 507 S.E. 8th Street, 72712
Industry Description Cheese production
Industrial Category NA 40 CFR NA SIC Code: 2022
Avg. Total Flow (gpd) 156,152 Avg. Process Flow (gpd) 26,900 process
92,730 washdown
Industry visited during audit: YES

Comments: application says 135,500 #/day cheese avg. Milk and cream is basic raw mtrl.

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism

1.	Does the file contain an application for a control mechanism?	1	✓	✓	✓	
	If yes, what is the application date?	11/04	4/05	8/03	1/05	
	Does it ask for Pollution Prevention information?	no	no	no	no	
2.	Does the file contain a Permit?	2	✓	✓	✓	
	Permit Expiration Date?	1/08	6/07	8/06	7/06	
	Is a fact sheet included?	3	✓	✓	✓	
3.	Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
	a. Legal Authority Cite?	✓	✓	✓	✓	
	b. Expiration date?	✓	✓	✓	✓	
	c. Statement of nontransferability?	✓	✓	✓	✓	
	d. Appropriate discharge limitations?	2	✓	✓	✓	

Comments: 1) See Attachment A-3 for example; 2) See Attch. A-2 for example; 3) See Attch. A-4 for example

SECTION III: INDUSTRIAL USER FILE REVIEW

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

C. Application of Standards

1. Has the IU been properly categorized?	✓	✓	✓	✓	
2. Were both Categorical Standards and Local Limits properly applied?	✓	✓	✓	✓	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	1	1	1	1	

Comments: 1) Recommend notifying SIUs of 40 CFR 403 Streamlining revisions

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A	N/A	N/A	N/A	
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	N/A	N/A	N/A	N/A	
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	N/A	N/A	N/A	N/A	
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	

D. Compliance Monitoring

Sampling

1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	
e. Sample preservation procedures?	✓	✓	✓	✓	

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
f. Chain-of-custody records?	✓	✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	N/A	N/A	N/A	N/A	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	✓	✓	✓	✓	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	
Inspections					
7. Does the IU file contain inspection reports?	1	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	
b. Date of last Inspection	8/05	8/05	8/05	8/05	
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	N/A	N/A	N/A	N/A	

Comments: 1) See Attachment A-5 for example

SECTION III: INDUSTRIAL USER FILE REVIEW

		FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
e.	Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	✓	✓	✓	✓	
f.	Evaluation of pretreatment facilities?	✓	✓	✓	✓	
g.	Evaluation of self-monitoring equipment and techniques?	✓	✓	✓	✓	
h.	(Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	✓	✓	✓	✓	
i.	Manufacturing facilities?	✓	✓	N/A	✓	
j.	Chemical handling and storage procedures?	no	no	no	no	
k.	Chemical spill prevention areas?	✓	✓	✓	✓	
l.	Hazardous waste storage areas and handling procedures?	2	1	1	1	
m.	Sampling procedures?	✓	✓	✓	✓	
n.	Laboratory procedures?	N/A	N/A	N/A	N/A	
o.	Monitoring records?	✓	✓	✓	✓	
p.	Evaluation of Pollution Prevention opportunities?	✓	✓	✓	✓	
q.	Control Authority inspector signature?	✓	✓	✓	✓	

IU Self-Monitoring and Reporting

10.	Does the file contain self-monitoring reports?	✓	✓	✓	✓	

Comments: 1) Question is included regarding haz waste generation but, not handling procedures nor storage areas; 2) Kennametal reports they are a haz waste generator but inspection form indicates otherwise (see Attchs A-3t and A-5e).

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
11. Does the file include:					
a. BMR?	N/A	N/A	N/A	N/A	
b. 90-Day Report?	N/A	N/A	N/A	N/A	
c. All periodic reports?	✓	✓	✓	✓	
d. Compliance schedule reports?	N/A	N/A	N/A	N/A	
12. Did the IU report on all required parameters?	✓	✓	✓	✓	
13. Did the IU comply with the required sampling frequency(s)?	✓	✓	✓	✓	
14. Did the IU report flow?	✓	✓	✓	✓	
15. Did the IU comply with the required reporting frequency(s)?	✓	✓	✓	✓	
16. For all SIUs, are self-monitoring reports signed and certified?	1	1	1	1	
17. Did the IU report all changes in its discharge? [403.12(j)]	N/A	N/A	N/A	N/A	
18. Has the IU developed a Slug Control and Prevention Plan?	✓	✓	✓	✓	
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	2	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	no	no	no	no	
b. Did POTW respond to the spill?	--	--	--	✓	

Comments: 1) They don't include the proper certification statement per 403.6; 2) Basically just a slug load of milk they discharged with no harm to the POTW

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
E. Enforcement					
1. Were all discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	✓	✓	✓	✓	
b. IU self-monitoring results?	✓	✓	✓	✓	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	N/A	N/A	N/A	N/A	
2. How many reports submitted during the past reporting year indicated discharge violations?	1	Ph 3	3	2	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	✓	✓	✓	✓	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	✓	✓	✓	✓	
5. Were all nondischarge violations identified in the file?	N/A	N/A	✓	N/A	
6. Was the IU notified of all violations?	✓	✓	✓	✓	
7. Was follow-up enforcement action taken by the Control Authority?	✓	✓	✓	✓	
8. Did the Control Authority follow its approved ERP?	✓	✓	✓	✓	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	✓	✓	✓	✓	

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
10. Is there a compliance schedule? If yes:	no	no	no	no	
11. Were there any compliance schedule violations?	N/A	N/A	N/A	N/A	
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	
b. TRC	✓	✓	✓	✓	
c. Pass through/Interference	✓	✓	✓	✓	
d. Spill/slug loads	✓	✓	✓	✓	
e. Reporting	✓	✓	✓	✓	
f. Compliance schedule	✓	✓	✓	✓	
g. others (specify)					
13. Was the SIU published for SNC?	no	no	no	no	
Date of publication.	N/A	N/A	N/A	N/A	

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Bentonville NPDES #: AR0022403
Date of Audit: 6/20-22/06 Date entered into QNCR: 10/27/06

(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 Bentonville NPDES #: AR0022403

Name, address and phone number of industry:

Kraft Foods, 507 S.E. "E" Street, 479.273.5561 X-132

Type of industry: Cheese Mfg. Date/Time of visit:

6/21/06 / 9:14 a.m.

Industry Contacts: Rich Holtquist - Plant Mgr / A.J. Rorie - Business Unit Leader

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

*pH adjustment; +They are sending waste whey off-site

Additional comments: Time constraints limited the site visit to the "pretreatment building" and below ground concrete vaults where pH is adjusted prior to release to the City. Touring the entire process building would have yielded little more info because of "proprietary" processes in use.

Visit conducted by: Gilliam/Busen Date: 6/21/06

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Bentonville NPDES #: AR0022403

Industry name: Kraft Foods

Additional comments: All process wastewater including washdown (~90,000 gpd) gravity flows to two (2) parallel outside containment pits. The volume and retention time of these pits do not have the capacity for any biological treatment. Raw materials used in product include milk, cream, salt, rennet and bacterial cultures. Clean-up washdown includes phosphoric acid which they may have to research for alternatives. "Pretreatment", or pH adjustment prior to discharge to the city includes the addition of sulfuric acid. Facility reps indicated they have an "employee awareness" program for reduction for solids removal as well as an "annual environmental awareness day". They also foresee an increase in production. City has approached the facility regarding re-allocation of conventional pollutant loadings and additional surcharges, including the addition of T.Phos. Correspondence (4/14/05) from Kraft to the City does indicate they will attempt to incorporate BMPs to reduce spills and slug loads (which have infrequently happened in the past). Adequate sampling site and building.

Visit conducted by: Gilliam/Busen Date: 6/21/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Bentonville NPDES #: AR0022403

Name, address and phone number of industry:

Kennametal Inc. (Previously Rogers Tool Works), 1602 E. Central, 479.986.4656

Type of industry: Machine Tool Dies Date/Time of visit: 6/21/06 / 10:45 a.m.

Industry contacts: James Gray - Human Res. Mgr.

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

Additional comments: Facility still makes tools and dies for various machining applications. Most of the processes involve machining (grinding, brazing, cleaning) of machine tool accessories (mainly drill bits) from stainless steel, tungsten and carbon steel.

Visit conducted by: Gilliam/Busen Date: 6/21/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

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

Control Authority: City of Bentonville NPDES #: AR0022403

Industry name: Kennametal Inc.

Additional comments: Tungsten-carbide laden sludges are recycled by Kennametal. Cobalt is also "leached". Most of the machining operations now use an oil based cutting/coolant system, are CNC and self contained as far as fluid systems. Centrifuges are used more extensively with in-process filtration (1 micron) and closed-loop chilling units to extend the life of the fluids and coolants. The centralized filtration systems maintain 6 or 7 machining stations at a time. There are still a few grinding stations that utilize water based coolant systems and are the source of wastewater. What is generated is pumped to an open topped pretreatment ("coalescing") tank where oil is skimmed off, followed by two paper filters and charcoal filtration prior to batch discharge to the POTW (~2,200 gpd). Adequate sampling site.

Visit conducted by: Gilliam/Busen Date: 6/21/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Bentonville NPDES #: AR0022403

Name, address and phone number of industry:
Fujicolor (Fujifilm) 1107 S.E. 10th Street, 479.464.2120
Type of industry: Photo Processing & de-silvering Date/Time visit: 6/21/06 / 1:20 p.m.
Industry contacts: Bill Thompson - Ops Mngr / Jim Johnson

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

Additional comments: IU's operations haven't changed substantially since the last audit done in '01. Volume is still continuing down because of digital cameras, however. IU processes different types of film for the Wal-Mart corporation. Film comes in from various states around the region.

Visit conducted by: Gilliam/Busen Date: 6/21/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Bentonville NPDES #: AR0022403

Industry name: Fujicolor (Fujifilm)

Additional comments:

Process begins where film is "spliced" together for a continuous ribbon for developing. Typical film processes of developer, bleaching and fixer with associated rinses are in place at facility. Both film and paper picture processing utilize the same procedures. All wastewater from the processing area is gravity drained to their chemical mix "mezzanine" storage/treatment tanks.

Bleach, fixer and process washwater fluids are continuously de-silvered w/most regenerated utilizing electrolytic system where silver is plated onto cathode. Ag concentrations can enter as high as 5 g/l and is treated down to 0.5 g/l.

Sources of wastewater to the POTW come from the various process rinses. Those streams are treated through ion exchange resin canisters and are regenerated using sulfuric acid. An ion exchange steel wool system is used for polishing the fixer bleach stream.

Some P2 techniques discussed included efficient maintenance of "squeegees and rollers" in the processing line to reduce carryover of Ag into regenerate system.

Serpentine steel racks are periodically washed utilizing ultrasound and mild soap to remove algae. Small amounts of biocide are added to inhibit growth.

IU representative was knowledgeable of local limits.

Adequate sampling site.

Visit conducted by: Gilliam/Busen Date: 6/21/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Bentonville NPDES #: AR0022403

Name, address and phone number of industry:

Walmart TMG, 6301 SW Regional Airport Rd.

Type of industry: Truck Maintenance & Wash Date/Time of visit:

6/22/06 / ~9:00 a.m.

Industry contacts: Randall Stafford

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

Additional comments:
Facility's main wastewater generation comes from the washdown of their "18-wheelers" which consists of a fleet of around 230 tractors. Trailer washes - probably about 150/month.
*Facility is experimenting with citric instead of phosphoric acid in their wash as a more environmentally preferable raw material and looking at complete recycle.

Visit conducted by: Gilliam/Busen Date: 6/22/06

(signature of auditor conducting visit)

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

Control Authority: City of Bentonville NPDES #: AR0022403

Industry name: Walmart TMG

Additional comments: Facility used "Whiting Systems" for their wash system design/construction. Whiting reps have made contact with this office many times regarding truck/car wash potential regs and pretreatment issues.
Wash includes a phosphoric acid they call "lightening" which is only about 3% acid as a brightener. Their complete wash process consists of that acid cycle; an alkaline soap cycle, several rinse "washes" followed by a final clean water rinse. All oils from maintenance is recycled, coolants are recovered in drums and sent off-site. Other than a sand oil separator, the facility doesn't require any additional pretreatment to meet the city's requirements.

Visit conducted by: Gilliam/Busen Date: 6/22/06

Allen Gilliam

(signature of auditor conducting visit)

Attachment A1

City of Bentonville, Arkansas
Industrial Pretreatment Division
Liquid Waste Hauler Permit

Permit No. BWH 05 – 02

In accordance with the provisions of Ordinance # 95 - 90;

Name: **Best Jet Sewer and Drain**
P.O. Box 8113
Fayetteville, AR 72703

is hereby authorized to transport and dispose of wastewater to the Bentonville Wastewater Treatment Plant in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards, or requirements under Federal, State or local laws, including any such regulations, standards, requirements or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of Ordinance # 95-90.

This permit shall become effective on September 15, 2004 and shall expire at midnight on September 14, 2005.

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal of this permit in accordance with the requirements of Ordinance # 95-90, **a minimum of 30 days prior to the expiration date.**

Issued by_____

Pretreatment Director, City of Bentonville

this _____ day of _____, 20 ____.

Section 1 - Areas Regulated by Permit

A. The City of Bentonville will accept loads from all residential customers receiving utility services from the City of Bentonville who are not presently connected to the City's wastewater collection system. The City will also accept loads from all residential customers with septic tanks in the City of Centerton. It is the responsibility of the waste hauler to provide documentation to verify that the waste originated from any of the acceptable areas. A waste hauler wanting to dispose of any load originating from outside of these designated areas will do so only after permission has been granted by the wastewater treatment plant's plant manager or personnel authorized by the plant manager.

B. A waste hauler wanting to dispose of any load from a commercial or industrial establishment will do so only after permission has been granted by the plant manager or personnel authorized by the plant manager.

Section 2 - Discharge Requirements

A. Disposal Point

1. The disposal of all trucked wastes must be performed at a location designated by the wastewater plant's plant manager or authorized representative.

2. Disposal to the Bentonville wastewater collection system at any other location is prohibited without permission from the plant manager or other authorized representative. The permittee must provide notice to the wastewater personnel prior to disposal and the actual disposal must be performed under the supervision of plant personnel. In all cases, disposal may only be performed Monday through Friday from 8:00 a.m. to 4:00 p.m., excluding holidays.

B. Waste Analysis

1. Trucked wastes may be subject to sampling and analysis. The permittee may also be required to suspend the discharge of waste until the analysis is complete. The cost of this analysis will be covered by the waste generator. The Bentonville Wastewater Treatment Plant reserves the right to refuse permission to dispose of any trucked waste.

2. The City is not obligated, by issuance of this permit, to analyze all trucked wastes.

Section 3 - Prohibited Discharges

A. General Prohibitions

The permittee shall not introduce into the wastewater treatment plant any pollutant(s) which may cause pass through or interference with the treatment process.

B. Specific Prohibitions

The permittee shall not introduce the following pollutants into the wastewater plant:

1. Pollutants which create a fire or explosion hazard in the treatment plant, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 ° Fahrenheit or 60 ° Centigrade.

2. Pollutants which will cause corrosive structural damage to the wastewater treatment plant, but in no case discharges with a pH lower than 5.0 standard units.

3. Solid or viscous pollutants in amounts which will cause obstruction to the flow in the wastewater treatment plant.

4. Any concentration of free or emulsified oil and/or grease of animal or vegetable origin that, in a particular case, can: (a) overload skimming and grease handling equipment; or (b) have deleterious effects on the treatment process due to the excessive quantities.

5. Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts exceeding 100 mg/l.

6. Any material which may cause excessive discoloration, such as but not limited to, dye wastes and vegetable tanning solutions where the discoloration will not be removed by the wastewater treatment plant.

Section 4 - Monitoring and Records

A. All wastes must be accompanied by a completed waste manifest form. The form must contain the following information:

1. Permittee's name (Company name on the trip tickets)

2. Customer name and address

3. Customer's phone number or city utilities account number (must be an account number from Bentonville or Centerton)

4. Date and time septic tank was pumped out

5. Waste description

6. Date and time load was disposed of

7. Quantity of load (gallons)

8. Signatures of customer, transporter, and disposer

B. The permittee shall retain records of all monitoring information, waste manifest forms, copies of all reports required by this permit, and records of all data pertaining to hauled loads for a period of at least three years.

Section 5 - Standard Conditions

A. Severability

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

B. 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 actions, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

C. Permit Modification

This permit may be modified for good causes including, but not limited to, the following:

1. To incorporate any new or revised Federal, State or local pretreatment standards or requirements;

2. Material or substantial alterations or additions to the discharger's operation, or discharge volume or character which were not considered in drafting the effective permit;

3. A change in any condition in either the discharger or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;

4. Information indicating that the permitted discharge poses a threat to the Control Authority's collection and treatment systems, POTW personnel, or the receiving waters;

5. Violation of any terms or conditions of the permit;

6. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;

D. Permit Termination

This permit may be terminated for the following reasons:

1. Falsifying manifest records;

2. Refusing to allow monitoring;

3. Failure to pay charges;

4. Attempting to dispose of any load in a manner other than those allowed by this permit.

A 1e

E. Continuation of Expired Permits

An expired permit will continue to be effective and enforceable until the permit is reissued if:

1. The permittee has submitted a complete permit application at least ninety (90) days prior to the expiration date of the user's existing permit;

2. The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the permittee.

Section 6 - Special Conditions

A. The permittee must carry liability insurance, and provide satisfactory evidence of it to the Control Authority, in such amounts and form as determined by the Control Authority. Such insurance shall afford compensation for taking corrective action and for bodily injury, and for property damage to third persons caused by accidental releases. Coverage shall be in the amount of one hundred thousand dollars ($100,00.00) per occurrence for bodily injury, and fifty thousand dollars ($50,000.00) per occurrence for property damage, and a policy of automobile liability insurance, covering the operation of each vehicle used in such business, in minimum amounts of one hundred thousand dollars ($100,000.00) per person for bodily injury, three hundred thousand dollars ($300,000.00) per occurrence for bodily injury, and fifty thousand dollars ($50,000.00) per occurrence for property damage. The City shall be named as an additional insured in all insurance policies required by this article.

B. The permit holder shall display on both sides of each vehicle (in color contrasting with the background using three inch letters or letters larger than the business name) the following:

Business Name
BVL WH 05 - 02

The permit holder shall keep the permit receipt, or a copy, in the vehicle at all times. A permit receipt will be supplied at the completion of permit requirements.

A-14

Attachment A-2

BENTONVILLE

Friday January 21, 2005

Tim Bair
Kennametal Inc.

Enclosed is your new discharge permit. The permit goes into effect February 1st 2005 and expires January 31st 2008. Split sampling has been simplified. Other than that you will find very little changed from your previous permit.

Regards,

Nancy Busen
Pretreatment Division
City of Bentonville WWTF
Phone: 479-271-3160
Fax: 479-271-3163

City of Bentonville, Arkansas
Industrial Pretreatment Division

Industrial User Permit

Permit No. IU05-01

Copy

In accordance with the provisions of Ordinance # 95-90 ;

Kennametal Inc.
1602 East Central
Bentonville, AR 72712

is hereby authorized to discharge industrial wastewater from the above identified facility into the Bentonville wastewater collection system in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit. Violation of any permit provision is a violation of Ordinance # 95-90, subject to enforcement action documented in the City of Bentonville's Industrial Pretreatment Program.

All discharges authorized herein shall be consistent with the 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, 2005 and shall expire at midnight on January 31, 2008.

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 renewal of this permit in accordance with the requirements of Ordinance # 95-90, a minimum of 60 days prior to the expiration date.

Issued this _____ day of _____, 20 _____

_____

Pretreatment Director

PART 1 – DESCRIPTION OF OUTFALL AND EFFLUENT LIMITATIONS

A. The Permittee is authorized to discharge process wastewater to the Bentonville wastewater collection system from the outfall(s) listed below.

Outfall 01

See attachment #1 for detailed drawing of pretreatment system.

The discharge tank is located in the Northwest corner of the covered storage room on the west side of the facility.
All authorized process wastewater shall be discharged through a 5" H flume to the Permittee's 6" sewer line west side of the facility.

If the Permittee installs additional or alternative pretreatment equipment resulting in a different discharge location, this permit will be modified for the purpose of authorizing the discharge, flow measurement, and sampling locations.

B. The discharge from the outfall shall not exceed the following concentration limits:

Parameter	Daily Maximum mg/l
Oil and Grease	100

The pH of the authorized discharge shall not be less than 5.0 standard units at any time.

C. The Permittee shall not discharge wastewater containing any of the following substances from any of the outfalls:

1. Any pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, waste streams with a closed cup flashpoint of less than 140° Fahrenheit or 60° Celsius using the test methods specified in 40 CFR 261.21.

2. Heat in amounts which will inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40° C. (104° F.)

3. Solids or viscous substances capable of causing obstructions or other interferences with proper operation of the sewer system.

4. Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts exceeding one hundred milligrams per liter (100 mg/l).

5. Any concentration of free or emulsified oil and/or grease of free or emulsified animal or vegetable origin that, in a particular case can: (a) deposit grease or oil in sewer lines in such a manner as to clog the sewers; (b) overload skimming and grease-handling equipment; or (c) have deleterious effects on the treatment process due to the excessive quantities.

6. Any pollutant, including oxygen demanding pollutants at flow rate and/or concentration which will cause the pollutant to pass through to the receiving waters or interfere with the wastewater treatment facility.

7. Any pollutant 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 wastewater treatment plant.

8. Any pollutant containing noxious or malodorous gases or substances capable of creating a public nuisance;

9. Any pollutant containing solids of such character and quantity that special and unusual attention is required for their handling;

10. Any pollutant containing any substance which may affect the treatment plant's effluent and cause violation of the NPDES Permit requirements;

11. Any pollutant containing any substance which would cause the treatment plant to be in noncompliance with sludge use, recycling, or disposal criteria pursuant to guidelines or regulations developed under section 405 of the Clean Water 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;

12. Containing color which is not removed in the treatment processes;

PART 2 - MONITORING AND REPORTING REQUIREMENTS

A. The Permittee shall monitor outfall 01 for the following:

Parameter	Units	Frequency of Analysis	Sample Type
Process Flow	MGD	once / month	Totalizing Meter
pH	Standard Units	once / month	Grab
Oil and Grease	mg/l	once / month	Grab
Total Zinc	mg/l	once / month	24 FC
Total Copper	mg/l	once / month	
Total Chromium	mg/l	once / month	
Total Nickel	mg/l	once / month	24 FC

When the proposed Metal Products and Machinery Rule becomes final, the permittee will have to demonstrate that it is exempt from this regulation due to flow. If this is not demonstrated, the limits will be applied to this facility upon the effective date of the rule.

B. All handling and preservation of collected samples and laboratory analyses of samples shall

4-2d

be performed in accordance with 40 CFR 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit.

C. pH instrumentation will be calibrated utilizing a minimum of two buffer solutions. A pH 7 buffer and a buffer in the range of typical pH measurements will be used. Documentation of calibration of pH instrumentation will be retained by the permittee and a copy included with the monthly monitoring report.

D. Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be collected at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water or substance. Monitoring points shall not be changed without approval by the Control Authority.

E. Flow measuring devices shall be installed, calibrated and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of 10% from true discharge rates throughout the range of expected discharge volumes.

F. Records of sampling and analysis information shall include:

1. The date, exact place, method, time of sampling, and the name(s) of the person or persons collecting the samples;

2. The dates analyses were performed;

3. Who performed the analyses;

4. The analytical techniques/methods used;

5. The results of such analyses; and

6. Results of duplicate and spiked samples.

G. Monitoring results obtained shall be summarized and reported on an Industrial User Monitoring Report Form once per month. The reports are due on the 15th day of the month following the monitoring period.

H. If the Permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR part 136 or as specified in this permit, the results of such monitoring shall be included in the calculation and results shall be reported in the monthly report and submitted to the Control Authority. Such increased monitoring frequency shall also be indicated on the monthly report.

I. Requirements for Sample Collection

All sampling will be conducted in accordance with the following requirements:

1. Flow meters will be calibrated before collection of all flow proportioned composite samples.

2. If automatic sampling equipment is used, all hoses and sample containers will be kept clean to prevent contamination from previous sampling events.

3. If refrigerated samplers are used, the temperature of the refrigerated portion of the sampler will be recorded when a twenty-four hour composite is collected. If portable samplers are used, the sample tub will be iced down and the temperature of the composite sample will be recorded.

4. All samples will be properly preserved. If samples are not preserved on site, they should be sent to the contract laboratory as soon as possible for preservation.

5. All samples will be collected in the correct sample container size and type.

6. All twenty four hour composite samples will consist of at least twelve aliquots.

7. All pH measurements will either be conducted on site or within fifteen minutes of sample collection.

8. Samples collected for Oil and Grease analysis will be in glass containers with Teflon lined caps. Glass sample bottles for Oil and grease analysis should be rinsed with the solvent used for extraction in the test procedure prior to sample collection.

9. A chain of custody form will be completed for each sampling event. The chain of custody form should indicate sample identification, date and time of sampling, the person or persons who collected the sample(s), sample type, sample container size and type, preservatives used, pollutants to be analyzed for, and date and time of when sample(s) were relinquished and received if a contract lab is used.

10. If the Permittee requests a sample split with the Control Authority, splitting of samples will consist of aliquots of one well mixed composite sample adequate for analysis of the required parameters, dispensed with a representative of both the Permittee and Control Authority present and respective chains of custody completed on site. Samplers may be locked during sample collection. Grab samples will be collected as close to the same time period as possible.

J. Quality Assurance / Quality Control Requirements

1. A QA/QC program will be established and implemented. This program will consist of establishment of approved analytical methods, maintenance of QA/QC control charts, and establishment of standard operating procedures for sample collection.

2. Lab reports submitted along with self monitoring reports will include results of duplicates and spikes. Samples used for duplicates and spikes should have concentrations similar to the sample results being reported.

K. Instructions for Completion of Self-Monitoring Report Form

1. Enter dates beginning and ending the monitoring period covered by form where indicated.

2. Enter minimum, average, and maximum measurements during the monitoring period under the concentration column for Process Flow, Oil and Grease, Total Zinc, Total Copper, Total Chromium, and Total Nickel. Enter the minimum and maximum measurements during the monitoring period for pH.

3. Determine lbs./day of each pollutant from analytical data of each sample collected by the following formula:

   8.34 x Flow (MGD) x Concentration of pollutant (mg/l)

   Enter the average of lbs./day determinations on each sample collected under the quantity column.

4. Under "No. Ex.", enter the number of measurements that exceed the monthly average, daily maximum, or minimum permit limit for each parameter. For example, if the monthly average limit is exceeded and three sample measurements exceeded the daily maximum limit, that would be a total of four permit violations for that parameter for the monitoring period. The number "4" would be entered under the "No. Ex." column for that parameter.

5. Enter all values for Total Zinc, Total Copper, Total Chromium, and Total Nickel with three digits following the decimal point, use two digits following the decimal point for pH, and five digits following the decimal point for flow. If a measurement or average of measurements is below a detection limit, be sure to use the < sign.

6. Make appropriate entries for sample type ("G" for a Grab sample, "C" for a composite) and frequency of analysis (number of sampling events during the month).

L. If sampling performed by the Permittee indicates a violation, the Permittee shall notify the Control Authority within 24 hours of becoming aware of the violation. The Permittee 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.

Exception: the Permittee is not required to resample if:

1. The Control Authority performs sampling at the Permittee at a frequency of at least once per month, or

2. The Control Authority performs sampling at the Permittee between the time when the Permittee performs its initial sampling and the time when the Permittee receives the results of this sampling.

M. 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 date of the

sample, measurement, report or application. This period may be extended by request of the Control Authority at any time.

N. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Control Authority 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.

O. The Permittee shall give notice to the Control Authority 60 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.

P. All applications, reports or information submitted to the Control Authority shall be signed and certified.

1. All permit applications shall be signed:

   a. For a corporation: by a principal executive officer of at least the level of vice-president; or designated environmental officer.

   b. For a partnership or sole proprietorship: by a general partner or the proprietor, respectively;

2. 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:

   a. The authorization is made in writing by a person described above;

   b. 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.

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

   "I certify under 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."

4. Any change in signatures shall be submitted to the Control Authority in writing within 30 days after the change.

Q. Accidental Discharge Report

The Permittee shall notify the WWTP immediately upon the occurrence of an accidental discharge of substances prohibited by Ordinance # 95-90. During normal business hours the WWTP should be notified by telephone at 271-3160. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and

corrective actions taken. Within five days following an accidental discharge, the Permittee shall submit to the WWTP a detailed written report.
The report shall specify:

1. Description and cause of the upset, slug or accidental discharge, the cause thereof, and the impact on the Permittee's compliance status. The description should also include location of discharge, type, concentration and volume of waste.

2. 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.

3. All steps taken or to be taken to reduce, eliminate, and prevent recurrence of such an upset, slug, accidental discharge, or other conditions of noncompliance.

R. Notification of Bypass

1. In the event of an anticipated bypass:

If the Permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten (10) days before the date of the bypass, to the Control Authority.

2. For an unanticipated bypass:

The Permittee shall immediately notify the Control Authority and submit a written notice to the POTW within 24 hours of becoming aware of the bypass.

S. All reports required by this permit shall be submitted to the WWTP at the following address:

Bentonville Wastewater Treatment Plant
Attn: Pretreatment Director
1901 N. E. "A" Street
Bentonville, AR 72712

PART 5 - STANDARD CONDITIONS

A. Right of Entry

The Permittee shall allow the Control Authority, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

1. 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;
2. Have access to and copy, at reasonable times, any records that must be kept under

the conditions of this permit;

3. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;

4. Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and

5. Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under the permit, could originate.

B. Revocation/Severability

The provisions of this permit are severable, and permission to discharge to the control authority may be revoked by issuance of cease and desist order directing a noncompliant user to cease illegal or authorized discharges immediately if any provision of this permit is held invalid.

C. 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.

D. 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 non-complying discharge.

E. Permit Action

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

1. In order to incorporate any new or revised Federal, State, or local pretreatment standards or requirements;

2. Substantial alterations or additions to the discharger's operation which were not covered in the effective permit;

3. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge;

4. Information indicating that the permitted discharge poses a threat to the Control Authority's collection and treatment systems, POTW personnel, or the receiving

waters;

5. Violation of any terms or conditions of this permit;

6. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

7. Upon request of the Permittee, provided such request does not create a violation of existing applicable requirements, standards, laws, or rules and regulations.

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

F. 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.

G. Limitation on Permit Transfer

Industrial user permits are issued to a specific user for a specific operation and are not assignable to another user or transferable to any other location without the prior written approval of the Control Authority. In the event of sale, the Permittee must inform the purchaser of all responsibilities and obligations under this permit.

H. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must apply for and obtain a new permit. The application must be submitted at least 60 days before the expiration date of this permit.

PART 6 - OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

A. 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.

B. 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.

C. 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.

D. Adverse Impact

The Permittee shall take all reasonable steps to minimize any adverse impact to the POTW 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 non-complying discharge. The Permittee shall immediately notify the Control Authority of slug discharges or spills that may enter the public sewer, or any other significant changes in operations, wastewater characteristics and constituents.

E. Bypass of Treatment Facilities

Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury or severe property damage or no feasible alternatives exist. The Permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation.

F. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtities C and D of the Resource Conservation and Recovery Act.

PART 7 - ENFORCEMENT

A. Notice of Violation

A Notice of Violation is an official communication from the Control Authority to a noncompliant industrial user which informs the user that a pretreatment violation has occurred. The Control Authority will issue a Notice of Violation within ten (10) days after knowledge of the violation. Upon receipt of a Notice of Violation, the industrial user shall reply within fifteen (15) days of the date of the notice in one of the following forms:

1. A user admitting responsibility for the alleged violation shall submit a written report to the Control Authority stating the cause of noncompliance and corrective measures actually taken or to be taken to prevent any similar recurrent violations. If the violation involves exceeding parameters of permit discharge limits, the user shall also submit results of additional monitoring to demonstrate return to compliance with permit limits. This will consist of at least one (1) measurement within permit limits.

2. A user denying responsibility for the alleged violation shall submit a written report to the Control Authority setting forth the basis for the denial and requesting a Show Cause Hearing.

If a written response from the user is not submitted to the Control Authority within fifteen (15) days of the date of notice, the Control Authority may issue an Administrative Order or institute civil and/or criminal proceedings against the user.

B. Administrative Orders

Administrative Orders will be issued when Notices of Violation are not effective in bringing the industrial user into compliance in a timely manner. Such orders will include specific action to be taken by the user to correct the noncompliance within a time period also specified by the order.

Administrative Orders may include:

1. Compliance Schedules

2. Modification of an industrial user's permit

3. Modification of reporting requirements

4. Requirement of appearance at a Show Cause Hearing

The following is a brief description of the types of Administrative Orders the Control Authority will use:

1. Consent Order - The consent order is an agreement between the Control Authority and the industrial user normally containing three elements: (a) compliance schedules; (b) stipulated fines or remedial actions; and (c) signatures of Control Authority and industry representatives.

2. Show Cause Order - An order to show cause directs the user to appear before the Control Authority, explain it's noncompliance, and show cause why more severe enforcement actions against the user should not go forward.

3. Compliance Order - A compliance order directs the user to achieve or restore compliance by a date specified in the order. It is issued unilaterally and it's terms need not be discussed with the industrial user in advance.

4. Cease and Desist Order - A cease and desist order directs a noncompliant user to cease illegal or authorized discharges immediately or to terminate it's discharge altogether.

C. Civil or Criminal Action

The Control Authority will seek civil or criminal penalties under the provisions of Ordinance # 95-90 when other enforcement responses are not effective in bringing the industrial user into compliance with pretreatment standards and requirements. Penalties collected will be in an amount not to exceed one thousand dollars ($ 1,000) for each violation by industrial users of pretreatment standards or requirements. Such criminal or civil action may be initiated only after a majority vote of the City's governing body resolves to pursue such action. Each day of a continuing violation may be deemed a separate violation.

During the course of civil action, the Control Authority may need to assess penalties in an amount to recover the economic benefit an industrial user accrued by not complying with pretreatment standards and requirements on time. Penalty calculations will utilize the EPA's "Economic Benefit of Noncompliance" (BEN) model. This model is contained in EPA's "Guidance Manual for POTWs to Calculate the Economic Benefit of Noncompliance" dated 9/90. This calculation will normally be done manually utilizing the Economic Benefit Worksheet contained in said manual.

D. Recovery of Costs Incurred

In addition to civil and criminal liability, the Permittee violating any of the provisions of this permit or Ordinance # 95-90 or causing damage to or otherwise inhibiting the Control Authority wastewater disposal system shall be liable to the Control Authority for any expense, loss, or damage caused by such violation or discharge. The Control Authority shall bill the Permittee for the costs incurred by the Control Authority for any chemicals, cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation of Ordinance # 95-90.

PART 8 - DEFINITIONS

Act - The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. 1251 et. seq., as adopted by the Arkansas Water and Air Pollution Control Act, Act. 472 of 1949, as amended.

ADPC & E - The Arkansas Department of Pollution Control and Ecology.

Biochemical Oxygen Demand - The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedures in five (5) days at twenty degrees Celsius (20 C.)

A-2 N

expressed as milligrams per liter (mg/l).

Bypass - The intentional diversion of wastes from any portion of a treatment facility.

Categorical Standard - Any regulated pollutant discharge limit promulgated by the U.S. EPA in accordance with Sections 307 (b) and (c) of the Clean Water Act (33 U.S.C. 1317) which apply to a specific category of industrial users and which appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.

CFR - The Code of Federal Regulations as published by the U.S. Government.

City - The City of Bentonville, Arkansas, or where the context indicates, the Mayor, Manager of the Wastewater Treatment Plant, or other authorized representative.

Cooling Water - The water discharged from any use such as air conditioning, cooling or refrigeration, or to which the only pollutant added is heat.

Control Authority - The administrator of the industrial pretreatment program as designated by the Mayor, and who is charged with certain duties and duties by the City's Sewer use ordinance.

Daily Discharge - The discharge of a pollutant measured during a calendar day or any 24 hour period that reasonably represents the calendar day for purposes of sampling. Daily discharge determination of concentration made using a composite sample shall be the concentration of the composite sample.

Daily Maximum Discharge Limit - The highest allowable daily discharge during the calendar month.

EPA - The U.S. Environmental Protection Agency, or where appropriate, the term may also be used as a designation for the Administrator or other duly authorized official of said agency.

Grab Sample - An individual sample collected on a one-time basis with no regard to the flow in the waste stream and without consideration of time.

Grease - Fatty acids, soaps, fats, waxes, oils, and any other material extracted by solvent from acidified samples and not volatilized during evaporation of the solvent.

Hazardous Waste - Any liquid, semi-liquid, solid waste, or combination of wastes, which, because of it's quantity, concentration, physical, chemical, or infectious characteristics may:

1. Have any of the following characteristics: toxic, corrosive, irritant or strong sensitizer, flammable or combustible, explosive or otherwise capable of causing substantial personal injury or illness; or

2. Pose a substantial hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise improperly managed, and is identified or listed as a hazardous waste as defined by the Arkansas Solid Waste Disposal Act, or the Administrator, United States Environmental Protection Agency pursuant to the Federal "Solid Waste Disposal Act", as amended by the "Resource Conservation and Recovery Act of 1976" and as may be amended in the future.

Industrial User - A source of indirect discharge.

Instantaneous Maximum Concentration - The maximum concentration allowed in any single grab sample.

Manager - The person designated by the Mayor to supervise the operation and maintenance of the publicly owned treatment works (POTW).

May - A discretionary term.

mg/l - Milligrams per liter or parts per million (ppm).

MGD - Million gallons per day.

Monthly Average Discharge Limitation - The highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

Non-contact Cooling Water - Water used for cooling which does not come into direct contact with any raw material, intermediate product, waste product, or finished product.

Permittee - The industrial user that has applied for and been issued a permit to discharge wastewater into the sewer system of the City of Bentonville, AR.

pH - The logarithm (base 10) of the reciprocal of the weight of hydrogen ions, expressed in standard units.

Pollutant - Any dredged spoil, soil waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discharged equipment, rock, sand, cellar dirt, and/or industrial or agricultural waste discharged into water.

Pollution - The man-made or man-induced alteration of the chemical, physical, biological, or radiological integrity of water below certain minimum desirable quality standards.

Pretreatment Requirement - Any substantive or procedural requirement related to pretreatment, other than a National Pretreatment Standard imposed on an industrial user.

Pretreatment Standard, or Standard - Any regulation containing pollutant discharge limit promulgated by the EPA in accordance with Section 307 (b) and (c) of the act which applies to industrial users. This term includes prohibitive discharge limits established pursuant to 40 CFR Section 403.5.

Publicly Owned Treatment Works (POTW) - The city sanitary sewer system or treatment works as defined by Section 212 of the Act.

7 Day Average - Other than for fecal coli form bacteria, the arithmetic mean of the values for effluent samples collected over a calendar week.

Shall - A mandatory term.

Significant Industrial User - A wastewater source that:

1. Is a categorical industry under the Federal regulations; or

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 contributing industries, on the treatment works or on the quality of its effluent.

Slug Discharge - Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge.

State - The State of Arkansas

Surcharge - A service charge in addition to the normal monthly rate which shall be assessed to those non-domestic users who discharge into the Bentonville system wastewater pollutant levels exceeding those found in typical domestic wastewater.

30 Day Average - Other than for fecal coli form bacteria, the arithmetic mean of the values for effluent samples collected over a calendar month.

Total Suspended Solids (TSS) - The total suspended matter that floats on the surface of, or is suspended in, water, wastewater, or other liquids, and which is removed by laboratory filtering using a method which is approved by the EPA in 40 CFR 136.

Total Toxic Organics (TTO) - All quantifiable values greater than 0.1 milligrams per liter for each toxic organics as specified under Section 307 (a) of the Act.

Toxic Pollutant - Any pollutant or combination of pollutants listed as toxic in regulations promulgated by the Administrator of the Environmental Protection Agency under the provision of the Federal Water Pollution Control Act (Clean Water Act), Section 307 (a), or other federal law.

24-hour Composite Sample - Consists of a minimum of 12 effluent portions collected at equal time intervals over the 24 hour period and combined proportional to flow or a sample collected at frequent intervals proportional to flow over the 24 hour period.

Upset - 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.

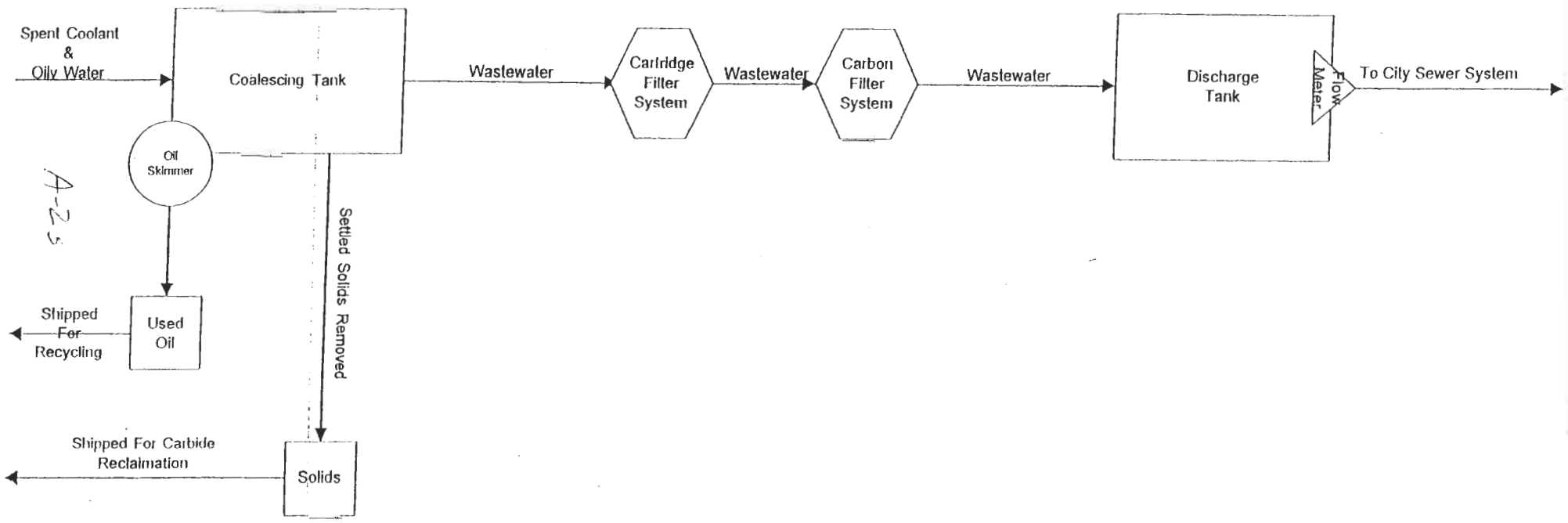
User - Any person who contributes, causes, or permits the contribution of wastewater into the City POTW.

Wastewater - The water, whether treated or untreated, that has been used by and discharged from any industry, commercial enterprise, household or other water consumer.

Attachment No. 1
Drawing of sample collection site.

Kenname Bentonville
Facility

Spent Coolant and Oily
Water Treatment



A-25

Facilities Engineering
Drawn 11/27/2001
Drawn By: TLB
Oil Removal System Bentonville.vsd

Attachment A-

CITY OF BENTONVILLE
Industrial Wastewater Discharge
PERMIT APPLICATION

RECEIVED
DEC 02 2004
By Nancy Dustin

Date: 11/19/04

Note: Please read all attached instructions prior to completing this application.

SECTION A – GENERAL INFORMATION

1. Facility Name: Kennametal Inc.

   a. Operator Name : Kennametal Inc.

   b. Is the operator identified in 1.a., the owner of the facility? Yes {x} No { }

   If no, provide the name and address of the operator and submit a copy of the contract and/or other documents indicating the operator's scope of responsibility for the facility. n/a

2. Facility Address:
   Street: 1602 East Central
   City: Bentonville State: AR Zip: 72712

3. Business Mailing Address:
   Street or P.O. Box: P.O. Box 9
   City: Rogers State: AR Zip: 72756

4. Designated signatory authority of the facility:
   (Attach similar information for each authorized representative)

   Name: Tim L. Bair
   Title: Facility Engineer
   Address: 205 North 13th St.
   City: Rogers State: AR Zip: 72757
   Phone #: 479-621-4726

5. Designated facility contact:

   Name: Tim L. Bair
   Title: Facility Engineer
   Phone #: 479-621-4726

SECTION B - BUSINESS ACTIVITY

1. If your facility employs or will be employing processes in any of the industrial categories or business activities listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), place a check beside the category or business activity (check all that apply).

Industrial Categories *

[ ] Aluminum Forming
[ ] Asbestos Manufacturing
[ ] Battery Manufacturing
[ ] Can Making
[ ] Carbon Black
[ ] Coal Mining
[ ] Coil Coating
[ ] Copper Forming
[ ] Electric and Electronic Components Manufacturing
[ ] Electroplating
[ ] Feedlots
[ ] Fertilizing Manufacturing
[ ] Foundries (Metal, Molding and Casting)
[ ] Glass Manufacturing
[ ] Grain Mills
[ ] Inorganic Chemicals
[ ] Iron and Steel
[ ] Leather Tanning and Finishing
[ ] Metal Finishing
[ ] Nonferrous Metals Forming
[ ] Nonferrous Metals Manufacturing
[ ] Organic Chemicals Manufacturing
[ ] Paint and Ink Formulating
[ ] Paving and Roofing Manufacturing
[ ] Pesticides Manufacturing
[ ] Petroleum Refining
[ ] Pharmaceutical
[ ] Plastic and Synthetic Materials Manufacturing
[ ] Plastic Processing Manufacturing
[ ] Porcelain Enamel
[ ] Pulp, Paper, and Fiberboard Manufacturing
[ ] Rubber
[ ] Soap and Detergent Manufacturing
[ ] Steam Electric
[ ] Sugar Processing
[ ] Textile Mills
[ ] Timber Products

A facility with processes inclusive in these business areas may be covered by Environmental Protection Agency's (EPA) categorical pretreatment standards. These facilities are termed "categorical users".

2. Give a brief description of all operations at this facility including primary products or services (attach additional sheets if necessary):

Finishing of machine tool accessories and extrusion dies. Unit operations include milling, grinding and brazing.

3. Indicate applicable Standard Industrial Classification (SIC) for all processes (If more than one applies, list in descending order of importance.):

a. 3545
b.
c.
d.
e.

4. PRODUCT VOLUME:

PRODUCT (Brand name) (levels with others and no u.1)	PAST CALENDAR YEAR Amount Per Day (Daily Units) Average	Maximum	ESTIMATE THIS CALENDAR YEAR Amount Per Day (Daily Units) Average	Maximum
carbide tools	9506	11883	10457	13071

SECTION C – WATER SUPPLY

1. Water Sources: (check as many as are applicable)

[ ] Private Well
[ ] Surface Water
[X] Municipal Water Utility (Specify City): Bentonville
[ ] Other (Specify) : _____

2. Name on the water bill : RTW

Name: RTW
Street: 1602 East Central
City: Bentonville State: AR Zip: 72712

3. Water service account number: 2887-116958

4. List average water usage on premises:
(New facilities may estimate)

	TYPE	Average Water Usage (GPD)	Indicate Estimated (E) or Measured (M)
a.	Contact cooling water	0	n/a
b.	Non-contact cooling water	500	E
c.	Boiler feed	30	E
d.	Process	1200	E
e.	Sanitary	3000	E
f.	Air pollution control	0	n/a
g.	Contained in product	0	n/a
h.	Plant and equipment washdown	100	E
i.	Irrigation and lawn watering	0	n/a
j.	Other Evaporative Cooling	3850	E
k.	**TOTAL of A-J**	8680	M

SECTION D – SEWER INFORMATION

1. a. For an existing business:

Is the building presently connected to the public sanitary sewer system?

[X] YES: Sanitary sewer account number 2887-116958

[ ] NO: Have you applied for a sanitary sewer hookup? [ ] YES [ ] NO

b. For a new business:

(i). Will you be occupying an existing vacant building (such as in an industrial park)? [ ] YES [ ] NO

(ii) Have you applied for a building permit if a new facility will be constructed? [ ] YES [ ] NO

(iii) Will you be connected to the public sanitary sewer system? [ ] YES [ ] NO

2. List size, descriptive location, and flow of each facility sewer which connects to the City's sewer system. (If more than three, attach additional information on another sheet.)

Sewer Size	Descriptive Location of Sewer Connect or Discharge Point	Average Flow (GPD)
6"	West side of facility	3300
6"	East side of facility	1500

A-3e

SECTION E – WASTEWATER DISCHARGE INFORMATION

1. Does (or will) this facility discharge any wastewater other than from restrooms to the City sewer?

[x] YES If the answer to this question is "YES" , complete the remainder of the application.

[ ] NO If the answer to this question is "NO", skip to Section I.

2. Provide the following information on wastewater flow rate.
[New facilities may estimate]

a. Hours/ Day Discharged (e.g., 8 hours / day):

M 24 T 24 W 24 T 24 F 24 Sat 6 Sun 2

b. Hours of Discharge (e.g., 9 a.m. to 5 p.m.)

M 0 2400 T 0 2400 W 0 2400 T 0 2400 F 0 2400 Sat 0600 1200 Sun 2200 2400

c. Peak hourly flow rate (GPD) 674

d. Maximum daily flow rate (GPD) 5392

e. Annual daily average (GPD) 2468

3. If batch discharge occurs or will occur, indicate:
(New facilities may estimate)

a. Number of batch discharges 21 per day.

b. Average discharge per batch 120 (GPD)

c. Time of batch discharges 7 (days of week) at random (hours of day)

d. Flow rate 35 gallons / minute

e. Percent of total discharge 53%

4. Schematic Flow Diagram – For each major activity in which wastewater is or will be generated, draw a diagram of the flow of materials, products, water, and wastewater from the start of the activity to its completion, show all unit processes. Indicate which processes use water and which generate waste streams. Include the average daily volume and maximum daily volume of each waste stream (new facilities may estimate). If estimates are used for flow data this must be indicated. Number each unit process having wastewater discharges to the community sewer. Use these numbers when showing these unit processes in the building layout in Section H. This drawing must be certified by a State Registered Professional Engineer.

On file with Control Authority.

Facilities that checked activities in question 1 of Section B are considered Categorical Industrial Users and should skip to question 6.

5. For Non-Categorical Users Only: List average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both), for each plant process. Include the reference number from the process schematic that corresponds to each process. (New facilities should provide estimates for each discharge).

No.	Process Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)
1	washline	922	1008	batch
2	coolant	10	300	batch
3	die washer	268	536	batch

ANSWER QUESTION 6 & 7 ONLY IF YOU ARE SUBJECT TO CATEGORICAL PRETRETMENT STANDARDS.

6. For Categorical Users: Provide the wastewater discharge flows for each of your processes or proposed processes. Include the reference number from the process schematic that corresponds to each process. (New facilities should provide estimates for each discharge).

No.	Regulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)

No.	Unregulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)

No.	Dilution	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)

7. For Categorical Users Subject to Total Toxic Organic (TTO) Requirements:

n/a

Provide the following (TTO) information.

a. Does (or will) this facility use any of the toxic organics that are listed under the TTO standard of the applicable categorical pretreatment standards published by EPA?

[ ] YES
[ ] NO

b. Has a baseline monitoring report (BMR) been submitted which contains TTO information?

[ ] YES
[ ] NO

c. Has a toxic organics management plan (TOMP) been developed?

[ ] YES
[ ] NO

8. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

Current: Flow Metering	[x] YES	[ ] NO	[ ] N/A
Sampling Equipment	[x] YES	[ ] NO	[ ] N/A
Planned: Flow Metering	[ ] YES	[ ] NO	[ ] N/A
Sampling Equipment	[ ] YES	[ ] NO	[ ] N/A

If so, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below:

ISCO Model 3230 Bubbler Flow Meter

ISCO Model 2910R Composite Sampler

9. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics? Consider production processes as well as air or water pollution treatment processes that may affect the discharge.

[ ] YES
[X] NO (skip question 10)

10. Briefly describe these changes and their effects on the wastewater volume and characteristics: (Attach additional sheets if needed.)
n/a

11. Are any materials or water reclamation systems in use or planned?

[X] YES
[ ] NO (skip question 12)

12. Briefly describe recovery process, substance recovered, percent recovered, and the concentration in the spent solution. Submit a flow diagram for each process: (Attach additional sheets if needed.)
Spent metalworking fluids and oily waste are pumped into a coalescing tank where the solids settle out and the oil separates. The oil is removed via an oil skimmer and collected for recycling. The remaining fluid is pumped through a cartridge filter system and then through a carbon bed to further remove contaminents before being discharged.

SECTION F - CHARACTERISTICS OF DISCHARGE

All current industrial users are required to submit monitoring data on all pollutants that are regulated specific to each process. Use the tables provided in this section to report the analytical results. (**U**) for unknown. For all other (non regulated) pollutants, indicate whether the pollutant is known to be present (**P**), suspected to be present (**S**), or known not to be present (**O**), by placing the appropriate letter in the column for average reported values. Indicate on either the top of each table, or on a separate sheet, if necessary, the sample location and type of analysis used. Be sure methods conform to 40 CFR Part 136; if they do not, indicate what method was used.

New dischargers should use the table to indicate what pollutants will be present or are suspected to be present in proposed waste streams by placing a (**P**) expected to be present, (**S**) may be present, or (**O**) will not be present under the average reported values.

Pollutant	Detection Level Used mg/l	Maximum Daily Value		Average of Analysis		Number of Analyses
		mg/l	lbs./day	mg/l	lbs./day	
Acenaphthene						
Acrolein						
Acrylonitrile						
Benzene						
Benzidene						
Carbon TetraChloride						
Chlorobenzene						
1,2,4-Trichlorobenzene						
Hexachlorobenzene						
1,2-Dichloroethane						
1,1,1-Trichloroethane						
Hexachloroethane						
1,1-Dichloroethane						
1,1,2-Trichloroethane						
1,1,2,2-Tetrachloroethane						
Chloroethane						
Bis (2-chloroethyl) ether						
17 Bis (chloro methyl) ether						
2-Chloroethyl vinyl ether						
2-Chloronaphthalene						
2,4,5-Trichlorophenol						
Parachlorometa cresol						
Chloroform						
2-Chlorophenol						
1,2-Dichlorobenzene						
1,3-Dichlorobenzene						
1,4-Dichlorobenzene						
3,3-Dichlorobenzidene						
1,1-Dichloroethylene						
1,2-Trans-dichloroethylene						
2,4-Dichlorophenol						
1,2-Dichloropropane						
1,2-Dichloropropylene						
1,3-Dichloropropylene						
2,4-Dimethylphenol						
2,4-Dinitrotoluene						
2,6-Dinitrotoluene						
Diphenolhydrazine						
Ethylbenzene						
Fluoranthene						
4-Chlorophenyl phenyl ether						
4-Bromophenyl phenyl ether						

Pollutant	Detection Level Used mg/l	Maximum Daily Value		Average of Analysis		Number of Analyses
		mg/l	lbs./day	mg/l	lbs./day	
Bis (2-chlorisopropyl) ether						
Bis (2-chloroethoxy) methane						
Methylene Chloride						
Methyl chloride						
Methyl bromide						
Bromoform						
Dichlorobromomethane						
Chlorodibromomethane						
Hexachlorobutadiene						
Hexachlorocyclopentadiene						
Isophorone						
Naphthalene						
Nitrobenzene						
Nitrophenol						
2-Nitrophenol						
4-Nitrophenol						
2,4-Dinitrophenol						
4,6-Dinitro-o-cresol						
N-nitrosodimethylamine						
N-nitrosodiphenylamine						
N-nitrosodi-n-propylamine						
Pentachlorophenol						
Phenol						
Bis (2-ethylhexyl) phthalate						
Butyl benzyl phthalate						
Di-n-butyl phthalate						
Di-n-octyl phthalate						
Diethyl phthalate						
Dimethyl phthalate						
Benzo (a) anthracene						
Benzo (a) pyrene						
3,4-benzofluoranthene						
Benzo (k) fluoranthane						
Chrysene						
Acenaphthylene						
Anthracene						
Benzo (ghi) perylene						
Fluorene						
Phenanthrene						
Dibenzo (ah) anthracene						
Indeno (1,2,3,-cd) pyrene						
Pyrene						

Pollutant	Detection Level Used mg/l	Maximum Daily Value		Average of Analysis		Number of Analyses
		mg/l	lbs./day	mg/l	lbs./day	
Tetrachloroethylene						
Toluene						
Trichloroethane						
Vinyl chloride						
Aldrin						
Dieldrin						
Chlordane						
4,4-DDT						
4,4-DDE						
4,4-DDD						
Alpha-endosulfan						
Beta-endosulfan						
Endosulfan sulfate						
Endrin						
Endrin adephyde						
Heptachlor						
Heptachlor epoxide						
Alpha-BHC						
Beta-BHC						
Gamma-BHC						
Delta-BHC						
PCB-1242						
PCB-1254						
PCB-1221						
PCB-1232						
PCB-1248						
PCB-1260						
PCB-1016						
Toxaphene						
TCDD						
Asbestos						
Acidity						
Alkalinity						
Bacteria						
BOD_5						
COD						
Chloride						
Chlorine						
Flouride						
Hardness						
Magnesium						
NH_3-N						

4-3.m

Pollutant	Detection Level Used mg/l	Maximum Daily Value		Average of Analysis		Number of Analyses
		mg/l	lbs./day	mg/l	lbs./day	
Oil and Grease	0.1	139	2.66	50.4	1.04	12
T.S.S.						
TOC						
Kjeldahl N						
Nitrate-N						
Nitrite-N						
Organic N						
Orthophosphate P						
Phosphorus						
Sodium						
Specific Conductivity						
Sulfate						
Sulfide						
Sulfite						
Antimony						
Arsenic						
Barium						
Beryllium						
Cadmium						
Chromium	0.001	0.16	0.003	0.068	0.001	12
Copper	0.001	0.256	0.003	0.114	0.002	12
Cyanide						
Lead						
Mercury						
Nickel	0.001	0.124	0.005	0.059	0.001	12
Selenium						
Silver						
Thallium						
Zinc	0.001	5.6	0.074	1.506	0.031	12

SECTION G – TREATMENT

1. Is any form of wastewater treatment (see list below) practiced at this facility?
   [X] Yes
   [ ] No

2. Is any form of wastewater treatment (or changes to existing wastewater treatment) planned for this facility within the next three years?
   [ ] Yes, describe: _____
   [X] No

3. Treatment devices or processes used or proposed for treating wastewater or sludge (check as many as appropriate).
   [ ] Air flotation
   [ ] Centrifuge
   [ ] Chemical precipitation
   [ ] Chlorination
   [ ] Cyclone
   [X] Filtration
   [ ] Flow equalization
   [X] Grease or oil separation, type: skimming
   [ ] Grease trap
   [ ] Grinding filter
   [ ] Grit removal
   [ ] Ion exchange
   [ ] Neutralization, ph correction
   [ ] Ozonation
   [ ] Reverse osmosis
   [ ] Screen
   [X] Sedimentation
   [ ] Septic tank
   [ ] Solvent separation
   [ ] Spill protection
   [ ] Sump
   [ ] Biological treatment, type: _____
   [ ] Rainwater diversion or storage
   [ ] Other chemical treatment, type: _____
   [ ] Other physical treatment, type: _____
   [ ] Other, type: _____

4. Description

Describe the pollutant loadings, flow rates, design capacity, physical size, and operating procedures of each treatment facility checked above.

See attached flow diagram.

5. Attach a process flow diagram for each existing treatment system. Include process equipment, by-products, by product disposal method, waste and by-product volumes, and design and operating conditions.

6. Describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer. Please include estimated completion dates.

none

7. Do you have a treatment operator ? [X] Yes [ ] No

(if Yes,) Name: James Gray
Title: HR & EHS Manager

Phone: 479-986-4656

Full time: 0800 - 1700 (specify hours)

Part time: n/a (specify hours)

8. Do you have a manual on the correct operation of your treatment equipment?
[ ] Yes [X] No

9. Do you have a written maintenance schedule for your treatment equipment?
[ ] Yes [X] No

SECTION H - FACILITY OPERATIONAL CHARACTERISTICS

1. Shift Information

Work Days		[x] Mon.	[x] Tues.	[x] Wed.	[x] Thur.	[x] Fri.	[x] Sat.	[x] Sun.
Shifts Per work Day:		3	3	3	3	3	1	1
Empl's Per Shift:	1st	137	137	137	137	137	25	0
	2nd	38	38	38	38	38	0	0
	3rd	20	20	20	20	0	0	20
Shift Start And End Times:	1st	0600	----------		1400			
	2nd	1400	----------		2200			
	3rd	2200	----------		0600			

2. Indicate whether the business activity is:
[x] Continuous through the year, or
[ ] Seasonal – Circle the months of the year during which the business activity occurs:

J F M A M J J A S O N D

Comments: _____

---

3. Indicate whether the facility discharge is:

[x] Continuous through the year, or
[ ] Seasonal – Circle the months of the year during which the business activity occurs:

J F M A M J J A S O N D

Comments: _____

---

4. Does operation shut down for vacation, maintenance, or other reasons?

[ ] Yes, indicate reasons and period when shutdown occurs:

[x] No

5. List types and amounts (mass or volume per day) of raw materials used or planned for use (attach list if needed):

tungsten carbide blanks	656 lbs/day
steel	63 lbs/day

6. List type and quantity of chemicals used or planned for use (attach list if needed). Include copies of Manufacturer's Safety Data Sheets (if available) for all chemicals identified:

CHEMICAL	QUANTITY / year
Transgrind (machining oil)	3575 gals.
Richgrind (machining coolant)	660 gals.
Coolmist	275 gals.
Dri-Touch	165 gals.
Gillite	350 gals.
Citric Acid (powder)	900 lbs.
Oakite	550 gals.
Hydraulic & Lubricant Oils	330 gals.
Methanol	110 gals.
Mineral Spirits	165 gals.
Stabrex St-40	110 gals.
Trasar 23247	110 gals.
Ethylene Glycol	55 gals.

7. Building Layout – Draw to scale the location of each building on the premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram), public sewers, and each facility sewer line connected to the public sewers. Number each sewer and show existing and proposed sampling locations. This drawing **must** be certified by a State Registered Professional Engineer.

A blueprint or drawing of the facilities showing the above items may be attached in lieu of submitting a drawing on this sheet.

On file with Control Authority

SECTION J – NON DISCHARGED WASTES

1. Are any waste liquids or sludges generated and **not** disposed of in the sanitary sewer system?

[X] Yes, please describe below
[ ] No, skip the remainder of Section J

WASTE GENERATED	QUANTITY (PER YEAR)	DISPOSAL METHOD
Used Oil	4000 gals	recycle
Grinding sludge	6068 lbs	metals reclaim
Spent Dri-Touch	110 gals	fuel blended

2. Indicate which wastes identified above are disposed of at an off-site treatment facility and which are disposed of on-site. All waste are disposed of off-site.

3. If any of your wastes are sent to an off-site centeralized waste treatment facility, identify the waste and the facility.

4. If an outside firm removes any of the above checked wastes, state the name(s) and address (es) of all waste haulers:

a. Ashland Dist. Co - Garland
3101 Wood Dr.
Garland, TX 75041

Permit No. (if applicable): TXD980745095

b. PCI
5485 Tay-Ror Dr.
Millington, TN 38053

Permit No. (if applicable): TND00646943

5. Have you been issued any Federal, State, or local environmental permits?

[X] Yes
[ ] No

If yes, please list the permit(s): EPA Generator ID # ARD980620256
Stormwater Permit # ARR00B042

SECTION I – SPILL PREVENTION

1. Do you have chemical storage containers, bins, or ponds at your facility? [x] YES [ ] NO

If yes, please give a description of their location, contents, size, type, and frequency and method of cleaning. Also indicate in a diagram or comment on the proximity of these containers to a sewer or storm drain. Indicate if buried metal containers have cathodic protection. See Slug Control Plan

7. Do you have floor drains in your manufacturing or chemical storage area(s)?
[x] YES [ ] NO If yes; Where do they discharge to?
Into a sump system that is connected to the sanitary sewer.

8. If you have chemical storage containers, bins, or ponds in manufacturing area, could an accidental spill lead to a discharge to: (check all that apply).

[x] an onsite disposal system
[x] public sanitary sewer system (e.g. through a floor drain)
[ ] storm drain
[ ] to ground
[ ] other, specify:
[ ] not applicable, no possible discharge to any of the above routes

9. Do you have an accidental spill prevention plan (ASPP) to prevent spills of chemicals or slug discharges from entering the Control Authority's collection systems?

[x] Yes - (Please enclose a copy with the application)
[ ] No
[ ] N/A, Not applicable since there are no floor drains and/ or the facility discharge (s) only domestic wastes.

10. Please describe below any previous spill events and remedial measures taken to prevent their reoccurrence.

none

SECTION K – AUTHORIZED SIGNATURES

Compliance certification:

1. Are all applicable Federal, State, or local pretreatment standards and requirements being met on a consistent basis?

   YES [X] NO [ ] Not yet discharging [ ]

2. If No:

   a. What additional operations and maintenance procedures are being considered to bring the facility into compliance? Also, list additional treatment technology or practice being considered in order to bring the facility into compliance.

   b. Provide a schedule for bringing the facility into compliance. Specify major events planned along with reasonable completion dates. Note that if the Control Authority issues a permit to the applicant, it may establish a schedule for compliance different from the one submitted by the facility.

Milestone Activity	Completion Date

AUTHOIRZED REPRESENTATIVE 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.

___James Gray_____	____H. R. Manager_____
Name	Title
_____	_12/2/2004 _479-986-4656___
Signature	Date Phone

TIM L. BAIR FACILITY ENGINEER

Tim L Bair 12/02/04 479-621-4726

A-3w

Attachment A-4

City of Bentonville, Arkansas
Pretreatment Division

Industrial User Fact Sheet

1. General Information

a. Facility Information

IU Name:	**Kennametal, Inc.**
Address:	**1602 East Central** **Bentonville, AR 72712**
Contact:	**Tim Bair** **479-636-1515 Ext. 4205**

SIC:	3545
Permit #	IU05-01
Issue Date:	2-1-05
Expiration Date:	1-31-08
Category:	N/A
CWF Applied ?	No
TOMP on File ?	N/A
Spill/Slug Plan on File ?	Yes
Outfall:	01

b. Manufacturing/Service Description:

Manufacturer of machine tool accessories and plastic extrusion dies. Operations include milling, grinding and brazing.

c. Regulated Wastestreams:

Wastewater generated from manufacturing processes that use water based coolants and wastewater generated from parts cleaning.

d. Pretreatment System:

Water based coolant is collected and oil is skimmed off. Wastewater is then filtered through a charcoal filter vessel and a cartridge filter vessel prior to discharge.

e. Flow Information:

Primary Measuring Device: 0.5' H Flume

Average Daily Flow: 0.0025 MGD

Maximum flow through measuring device: 155.7 gpm

2. Permit Limits and Basis for Limits:

a. Discharge Limits:

The discharge from the outfall shall not exceed the following limits:

Parameter	Units	Permit Limit
Oil and Grease	mg/l	100
pH	Std. Units	≥ 5.0

b. Rationale for permit limits:

The Oil and Grease limit is a prohibited discharge listed in Ordinance # 95-90.

3. Reporting Requirements

a. Self Monitoring Requirements:

Parameter	Units	Monitoring Frequency	Sample Type
Process Flow	MGD	once / month	Totalizing Meter
pH	Std. Units	once / month	Grab
Oil and Grease	mg/l	once / month	Grab
Total Copper	mg/l	once / month	24 FC
Total Zinc	mg/l	once / month	24 FC
Total Nickel	mg/l	once / month	24 FC
Total Chromium	mg/l	once / month	24 FC

b. Kennametal, Inc. is required to summarize all monitoring data and report the summary on an Industrial User Self Monitoring Report Form once per month. The reports are due on the **15th day of the month** following the monitoring period. Kennametal, inc. is also required to submit the lab reports used to generate the Self Monitoring Report and the Chain of Custody records.

c. The industrial user permit issued to Kennametal, Inc. contains standard conditions consistent with EPA and ADEQ requirements. Enforcement provisions listed in Kennametal's permit are in accordance with the City of Bentonville's Enforcement Response Guide.

Attachment A-5

City of Bentonville
Industrial Pretreatment Division

Compliance Inspection Report

Name of Permittee **Kennametal Inc.**

Date and time of Inspection **August 15, 2005 10:00am**

Name and Title of Inspector **Nancy Busen Lab / Pretreatment Director**

Name, Title, and telephone number of Facility Representative **James Gray**
Human Resources Director

Name and Title of Other Participants **Tim Bair, Facility Engineer 479-636-1515 ext. 4721**

☒ Announced Inspection ☐ Unannounced Inspection

Part 1. General Information

☐ Categorical IU ☒ Non-categorical SIU

Industry Type

Applicable SIC Code(s) **Machine Tool Accessory Manufacturer**

Manufacturing processes used **3545**

w materials used **Grinding, braising, machining, cleaning and pressure testing of metal and carbide tools.**

Regulated Wastestream(s) **Oil and water based coolants, and wastewater from all machining and cleaning.**

Outfall Description **From Central Ave. east bound turn right at first driveway, right at end of drive and right again after passing the gate. The sample point is directly ahead on the north wall and consists of a 5" "H" flume to an 8" sewer line.**

Is treatment batch or continuous ? **Batch**
Is discharge batch or continuous ? **Batch**

Average discharge flow (MGD) **.0022 MGD**

Applicable categorical standards: (e.g., 413, 433, 425, etc.) **N/A**

Pollutants covered by local limits: **pH Daily Discharge Limit - No less than 5.0**
Oil & Grease Daily Discharge Limit – Less than 100mg/L

Type of wastewater treatment utilized **All process wastewater is discharged into a settling/ coalescing tank where oil is skimmed off. Wastewater is then treated passing through a charcoal filter followed by a finishing filter prior to batch discharge.**

Is the IU currently in compliance with?

Yes	No	
☐	☒	Permit Limits
☒	☐	Reporting Requirements

If no, what is the nature of non-compliance ? **One Oil & Grease violation in the past year**

Is the IU currently operating under any consent decree, Administrative Order, compliance or enforcement action ?

Yes	No
☐	☒

Findings of most recent Pretreatment Compliance Inspection:

Date **May 6, 2004** Deficiencies Noted **Two pH violations**

What progress has the IU made in correcting the identified deficiencies ?

Due to no technical basis for more stringent limitations, IU negotiated the use of the general pretreatment regulations standard daily minimum of no less than 5.0 S.U. with no maximum with Control Authority on Feb. 5, 2004. No violations noted since that date.

Part 2. Treatment Facility Evaluation, Pollution Prevention Activities, Spill and Slug Control

Is the permittee currently experiencing difficulties in treatment plant operation ?

Yes	No
☐	☒

If yes, describe the problems currently existing:

Overall evaluation of the permittee's treatment facility / operation of facility: **In addition to the settling and skimming process, oil retaining devices have been introduced prior to discharge this equipment. The interior of the facility is clean and well organized. Education and restricted access to critical discharge processes has been conducted. This will result in fewer mistakes and accidental discharges.**

Yes	No	
☒	☐	Are there O & M policies and procedures ?
☒	☐	Is mode of operation consistent with procedures in the O & M manual ?

Comments **See above.**

Does the permittee utilize any of the following Pollution Prevention measures ?

Yes	No	
☒	☐	Technology Changes
☐	☒	Input Material Substitutions
☐	☒	Product Changes

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Part 2. Pollution Prevention (continued)

Yes	No	
☑	☐	Recycling
☒	☐	Good Operating Practices

Comments: **Oil Absorbing "socks" have been placed in the mop wash tank. These allow water to pass through but retain oil for recycling. Mats are now used to reduce the amount of oil that is discharged by mopping floors. Ashland Environmental picks up all oil and oil products for recycling. Steel, metal, light bulbs and electronic components are also recycled.**

Describe the impact a slug load from this facility would have on the POTW: **A cutting oil discharge of massive quantity would cause some inhibition at the POTW. Sealed drains at the facility make this occurrence unlikely.**

What chemicals are used at the facility ? **Gillite, Citric Acid, Oakite, Sta-Brex (a biocide) ST40 (scale inhibitor), Dry Touch (rust inhibitor)**

Description of chemical storage areas: **Bulk Chemicals are stored on a maintenance pad All adjacent drains are capped.**

Yes	No	
☐	☒	Can chemicals reach floor drains if spilled ?
☐	☒	Has the facility had any past slug discharges ?

Comments

Does the permittee have adequate spill prevention measures in place ?

Yes	No
☒	☐

If no, describe the action(s) that need to be taken:

Part 3. Sludge Generation / Waste Disposal

Sludge dewatering method used **Sludge from this facility consists of Tungsten-Carbide grindings. It is not processed but collected for recycling.**

Average Solids Content (%) **N/A**

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Part 3. Sludge Generation / Waste Disposal (Continued)

Amount generated (gallons / month) **N/A**

Disposal Method **N/A**

Sludge storage capacity **N/A**

Shipment frequency **N/A**

Are manifest records availalable ? **N/A**

Identification of sludge hauler(s) **N/A**

Disposal location(s) **N/A**

Yes	No	N/A	
☐	☒	☐	Is hazardous sludge generated ?
☐	☐	☒	Is hazardous waste discharged to the POTW ?
☐	☐	☒	Are hazardous waste manifests available ?

Manner of hazardous waste disposal **N/A**

Part 4. Analysis of Self Monitoring Program

Flow Measurement

Yes	No	N/A	
☒	☐	☐	Is the primary measuring device in good condition ?
☒	☐	☐	Secondary instruments properly operated and maintained ?
☒	☐	☐	Is flow being measured accurately ?
☒	☐	☐	Is there documentation of flow meter calibration ?
☒	☐	☐	Are flow measurement records kept on file ?

Comments:

Sample Collection

Yes	No	N/A	
☒	☐	☐	Does the sampling location yield well-mixed, representative samples ?
☒	☐	☐	Are samples the correct type ?
☒	☐	☐	Are sample bottles the correct type ?
☒	☐	☐	Are composite samples proportional to flow ?
☒	☐	☐	Are samples cooled to 4° C. during collection of 24 hr. composites ?
☒	☐	☐	Are samples preserved properly ?
☒	☐	☐	Are complete chain of custody forms filled out for each sampling event ?

Comments:

Sample Analysis

Yes	No	N/A	
☒	☐	☐	Does the permittee perform any of the analysis in-house ?
☒	☐	☐	If yes to the previous question, does the permittee document instrument calibration and utilize QA / QC measures ?
☒	☐	☐	Are samples analyzed within required holding times per 40 CFR 136.3 ?
☒	☐	☐	Are approved analytical procedures (40 CFR 136.3) used ?
☒	☐	☐	Does sample analysis include analysis of duplicates, spikes, and standards ?
☐	☐	☒	Does permittee reject results of analysis or request analysis to be rerun due to poor precision and/or accuracy results ?

Comments: **To date questionable results have not been received from the contract lab. In house pH calibration records are submitted with monthly SMR.**

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Reporting Procedures

Yes	No	N/A	
☐	☐	☒	If the permittee is a Categorical IU, does it submit Baseline Monitoring Reports, reports on compliance with categorical pretreatment standard deadline, and periodic reports on continued compliance within the time frames specified in 40 CFR 403.12 ?
☐	☐	☒	If the permittee is discharging hazardous wastes as defined in 40 CFR 261, do they notify the POTW, the EPA Regional Waste Management Division Director, and state hazardous waste authorities in writing of such discharge ?
☒	☐	☐	Does the permittee submit reports by deadlines specified in its permit or by deadlines specified by an enforcement action ?
☒	☐	☐	If monitoring and analysis are performed more frequently than required by permit, are the results of additional analysis reported in permittee's self-monitoring report ?
☒	☐	☐	Does the permittee notify the Control Authority within 24 hours of becoming aware of a discharge violation ?
☒	☐	☐	Does the permittee submit results of additional analysis to the Control Authority within 30 days of becoming aware of a discharge violation ?
☒	☐	☐	Does the permittee notify the Control Authority in advance of any substantial change in the volume or nature of pollutants in their discharge ?
☒	☐	☐	Does the permittee immediately notify the Control Authority in the event of an accidental discharge or the discharge of a slug load ?
☒	☐	☐	Does the permittee, within 5 days after an accidental discharge or slug load, submit to the Control Authority a detailed written report describing the nature and cause of the discharge and the measures to be taken to prevent similar future occurrences ?
☒	☐	☐	If the permittee knows in advance of the need for a bypass of treatment equipment, does it submit prior notice to the Control Authority at least 10 days before the date of the anticipated bypass ?
☒	☐	☐	Does the permittee notify the Control Authority within 24 hours following an unanticipated bypass ?

mments:

Part 5. Results of Sampling and Analysis by Control Authority

Parameter	Date & Time of Sample	Sample Type	Preservation Technique
(T) Chromium	8/15 – 16/2005	24FC	HNO_3 pH <2, 4°C
(T) Copper	8/15 – 16/2005	24FC	HNO_3 pH <2, 4°C
(T) Nickel	8/15 – 16/2005	24FC	HNO_3 pH <2, 4°C
(T) Zinc	8/15 – 16/2005	24FC	HNO_3 pH <2, 4°C
Oil & Grease	8/15/05	Grab	H_2SO_4 pH<2, 4°C
pH		Grab	

Samples Collected by Romãn Rios and Bernie Almeter

Parameter	Units	Measured Value	Permit Limit
(T) Chromium	mg/L	0.046	No Limit
(T) Copper	mg/L	0.12	No Limit
(T) Nickel	mg/L	0.091	No Limit
(T) Zinc	mg/L	0.35	No Limit
Oil & Grease	mg/L	33	100mg/L
pH	S.U.	8.65	≥ 5.0 S.U.

Part 6. Inspection Findings and Required Corrective Action

Inspection findings and list of all deficiencies observed during this inspection:

Required Corrective Actions:

Inspection completed the _____ day of _____ , 20 ____.

_____

Control Authority Representative

A-5h

Industrial User Representative(s) present:

Name Printed	Signature	Date
Name Printed	Signature	Date
Name Printed	Signature	Date
Name Printed	Signature	Date

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Required Corrective Actions:

Inspection completed the Aug. 15th day of _____, 20 05.

Nancy Busen

Control Authority Representative

Industrial User Representative(s) present:

Name Printed	Signature	Date
TIM L. BAIR	Tim L. Bair	8/15/05
JAMES GRAY		8/15/05

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

EPA NPDES Compliance Inspection Report

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

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 2 5	3 AR0022403 11	12 06 06 20 17	18 G	19 S	20 I

Remarks: Pretreat Program Audit for Bentonville

21 66

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

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 2 5	3 AR0022403 11	12 06 06 21 17	18 U	19 S	20 2

Remarks: 04 SIU site visits

21 66

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

Section B: Facility Data

Name and Location of Facility Inspected
Bentonville Pretreatment Program Audit
City of Bentonville
1901 NE "A" Street
Bentonville, AR 72712

Entry Time	Permit Effective Date
[X] AM [ ] PM 7:00 AM 6/20/06	1/1/04
Exit Time/Date	**Permit Expiration Date**
3:00 PM 6/22/06	12/31/08

CODE SHEET

Pretreatment Audit

		CODE
Auditor's Name	Gillam	
Permit Number	AR0022403	
Audit Date	6/20-22/06	DTIA
Date Permit Modified to require pretreatment	11/28/84	PTIM

PPETS WENDB DATA ELEMENTS

Significant IUs without Control Mechanisms	0	NOCM
Number of Significant IUs	5	SIUS
Number of Categorical IUs	0	CIUS
Technical Evaluation for Local Limits	Y	EVLL
Adoption of Technically-Based Local Limits	Y	ADLL
Significant IUs not inspected or sampled	0	NOIN*
Significant IUs in significant noncompliance with standards or reporting	0	PSNC*
Significant IUs in significant noncompliance with self-monitoring	0	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	0	SNIN*