ADEQ

ARKANSAS
Department of Environmental Quality

October 28, 2010

James Yankee
Pretreatment Coordinator
P.O. Box 1784
Blytheville, Arkansas 72316

Re: City of Blytheville (NPDES #AR0022560) Pretreatment Program
Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Yankee,

Please find enclosed the finished report for the audit/assessment conducted June 22 though June 24, 2010. 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 corrective actions.

It was a pleasure working with you during the audit and becoming more familiar with Blytheville, its industries and Pretreatment Program.

Feel free to contact this office with any questions.

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
NPDES State Pretreatment Coordinator

Encl: Audit/Assessment Checklist

ec: Rudy Molina/EPA 6WQ-PO
Eric Fleming/ADEQ Inspector Supervisor
Cindy Garner/NPDES Enforcement Manage

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF BLYTHEVILLE, ARKANSAS

NPDES PERMIT #AR0022560

October 28, 2010

PREPARED BY: ALLEN GILLIAM

NPDES STATE PRETREATMENT COORDINATOR

ADEQ

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LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation

A) INTRODUCTION

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

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

An audit/assessment was performed June 22 through June 24, 2010, of the Pretreatment Program implemented by the City of Blytheville, Arkansas. Participants included:

Allen Gilliam	ADEQ / State Pretreatment Coordinator
James Yankee	City of Blytheville / Pretreatment Coordinator
Kenneth Ellis	City of Blytheville / Superintendent

The goals of the audit/assessment were:

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

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

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

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

Blytheville's Pretreatment Program was originally approved 3/21/86. Non-substantial program modifications were submitted 7/90. Subsequent substantial modifications were received by ADEQ and appeared to be a complete submittal to be current with 40 CFR 403. It was reviewed, approved for Public Notice and incorporated by reference on 4/12/05 into the City's three (3) NPDES permits: AR0022560, AR0022586 and AR0022578.

Program modifications to be current with the 40 CFR 403 Streamlining revisions were submitted, reviewed, approved and incorporated into their three (3) POTW NPDES permits on 8/1/07.

The City has three (3) wastewater treatment plants: the North, South and the West POTWs. All three

(3) are activated sludge biolac systems with diffused air in the first cell, return activated sludge with remaining sludge wasted to holding cells. Wastewater from the second aerated cell continues to a final clarifying cell then discharged after ultraviolet disinfection.

Sludge is stored in the holding cells where further reduction is accomplished and held indefinitely.

The North POTW receives the majority of the City's industrial wastewater flow estimated at 15% of its average flow of 0.65 MGD from five (5) significant industrial users (SIUs), four (4) of which are categoricals. The South POTW has no SIU contributions to its average flow of 0.6 MGD. The West POTW has two (2) non-categorical SIUs contributing an estimated 15% of its average flow of 0.99 MGD.

The West and South POTWs are required to conduct whole effluent toxicity (WET) testing. There has been no pattern of toxicity indicated from these facilities over the last five (5) years. The North POTW is a minor and no WET testing has ever been required although it receives the most potentially toxic wastewater from its industries.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of their industrial user files, pretreatment records and site visits to four (4) of their 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 Blytheville. 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 Blytheville'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)(1)(iii)(C)*** "...[permits]...must contain effluent limits based on applicable...categorical pretreatment standards..."

a) During the file review the limits page included the correct concentration limits, but also included mass limits (see Attachment A - 2d for example). The basis for the mass limits could not be explained nor were explained in the permits' fact sheets.

Remove the mass limits until the City can ascertain if they are necessary. Provide the basis if so.

b) Siemens' permit limits page only included the categorical Daily Maximum limits, but must also include their categorical Monthly Average Limits.

c) Motor Appliance batch discharges. Correct their sample type from 24 hr composite to "[number] of grabs over the batch discharge period."

2) Under ***40 CFR 403.8(f)(1)(v)*** "[The City will] Carry out all inspections, surveillance and monitoring and monitoring procedures necessary to determine, independent of information supplied by IUs…etc".

The industry inspections are still not comprehensive enough, included only basic/vague information (in some cases, none) regarding the various processes, wastestreams' identification, chemicals handling, products, pretreatment system, raw material, etc. (see Attachment A-3 for example).

Some improvement has been made since the last audit, but more narrative needs to be included before this auditor could call the inspections comprehensive. It was pointed out again if the City's IU inspections asked and narratively answered all questions on the Audit Checklist, Section III, part D.9.a. through m. ("Inspections"), an adequate inspection would have been complete.

3) Section D.1. of the IU permits requires a Pollution Prevention Assessment to be conducted with the submittal due within 1 year of the effective date of the permit" (see Attachment A-2e).

During the file reviews, no P2 submittals could be found or produced.

Either enforce this requirement or remove the language from existing permits and the City's Pretreatment Ordinance.

4) Under ***40 CFR 403.12(e)*** "Periodic reports on continued compliance...shall include a record of measured or estimated average and maximum daily flows...".

Not all reports included process flow separately from the entire facility flow. The regulated wastewater must be identified and separately reported. If it is unfeasible to measure the regulated vs. total plant flow, an explanation of the estimated regulated flow must be provided.

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

While there was evidence some IU surveys were recently sent, not all IUs "verbal" or "drive-by" surveys were dated or documented in a master file. Explain why they're not significant IUs. Continue with hard copy survey that is currently "on-going".

6) Under ***403.12(b)(3)*** "The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a **schematic process diagram** which indicates points of discharge to the POTW from the regulated processes."

The City must require updated schematics from their IUs. Some IU schematics in their files did not "fit" the actual process layouts at the facilities visited. It was difficult to determine work piece or wastewater flow and general layout of all wastewater generating operations.

One case in point: The sampling site or sites at Steel Related Technologies (SRT) was not clear on the schematic on file with the City. The facility's chrome plating line had not been updated for the City's file. There was a blank space on the sheet where it was to be placed, but it is now fully functional and is not located on the schematic in the City's files.

Send the IUs their schematics and require them to update as necessary and submit for the City's files.

7) Under ***40 CFR 403.8(f)(2)(vi)*** [The City] shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program (iv) "...analyze self-monitoring [City does this] reports and other notices submitted by Industrial Users in accordance with the self-monitoring [City] requirements in §403.12..."

During the file review, it was uncertain how the City verified compliance with Motor Technology's aluminum die-casting quench tank discharge limits under 40 CFR 464. The IU's permit limits should be converted to equivalent concentration as opposed to mass. These step-by-step calculations should be located in their fact sheet.

The City must confirm the IU's production and flow batch discharged from the quench tank to ascertain their allowable mass limits, hence conversion to equivalent concentration.

Motor Technology's quench tank is very infrequently batch discharged compared to the amount of aluminum poured. The allowable mass as well as the equivalent concentration limits will possibly be a hundred times the normal die caster's limits, but the City must verify compliance.

It was uncertain and could not be explained how compliance assurance was being conducted.

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

1) During the audit file review, most of the information required of the City's permitted industries was located although the City's coordinator had to do some searching.

Continue construction for each IU file a "Fact Sheet" (see Appendix I of EPA's "IU Permitting Guidance Manual" [9/89] for example) which identifies the industry's most pertinent information such as: narrative description of manufacturing processes, **updated schematics, latest application,** rationale for categorical determination and for being deemed "Significant", IU contact, monitoring frequency, parameters monitored for and why, etc. Basis/calculations for permit limits are other critical items to include. If a comprehensive fact sheet had been developed for each of the City's permitted industries, this auditor would not have had as many questions at the beginning of each IU site visit.

2) Following required action #5 above, include P2, Best Management Practices (BMP), water and energy consumption reduction questions in all IU surveys. The listing will help identify and locate new significant industrial users as well as those business/industry groups with Pollution Prevention (P2) opportunities.

3) Recommend establishing a Standard Operating Procedures (SOP) manual for the day-to-day activities of the Pretreatment Coordinator. Administration of correspondence, sampling (pictures of the actual sampling point would be helpful) and inspection procedures should be written/described and continually revised/updated as part of the Program. This will greatly aid new employees introduced to the City's Pretreatment Program and help cross-train another employee.

4) Recommend developing a sampling protocol for each IU. A picture of the exact sampling point would benefit a new employee also.

5) Recommend increasing the monitoring frequency at the facilities that are batch discharging more than twice/year. The City should be monitoring the process wastestreams each time there is notification from the IU "a batch is ready to be discharged".

6) Recommend combining Steel Related Technologies (SRT) and the old Sumitec file information together under one name. There was some confusion during the file review finding appropriate paperwork that now only applies to SRT since its acquisition of Sumitec. Information was scattered between two files.

7) Continue implementing and enforcing the grease trap program City-wide. The City reported thirty three (33) sanitary sewer overflows (SSOs) because of grease blockages during '06, but only seventeen (17) in '09.

8) It is **strongly** recommended to begin cross-training another person in the daily activities of the City's Pretreatment Coordinator.

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

The City's Pretreatment Ordinance and ERP have been submitted, approved and incorporated by reference in their three (3) NPDES permits. City Pretreatment personnel should double check the narrative portions of the rest of the Program to ensure there is no conflicting language or Ordinance citations.

* * * * * * * *

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information . . . . . Pages 1- 8
Section II: Pretreatment Program Analysis . . . . . Pages 9-21
Section III: Industrial User File Evaluation . . . . Pages 22-29

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Blytheville NPDES #: AR0022560
Mailing address: P.O. Box 1784, Blytheville, AR 72316-1784

Permit Signatory: Kenneth Ellis Title: Superintendent

Telephone: 870.763.4961 FAX NUMBER: 870.763.8541

Pretreatment Contact: James Yankee Title: Pretreatment Coordinator
Address: same
Telephone: same
E-Mail: jlyankee72315@yahoo.com
Pretreatment program approval date: 3/21/86

Dates of approval of any substantial modifications: 4/12/05

Month Annual Pretreatment Report Due: August

Pretreatment Year Dates: 8/1 - 7/31 Date(s) of Audit: 6/22 -24/10 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
*James Yankee	Pretreatment Coordinator	Same
Kenneth Ellis	Wastewater Supt.	"

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	5/08	More than a year had passed since the last IU inspections; one IU's pretreatment equip. did not appear operational; City's IU sampling had not been done that "pretreatment year"
PCI	6/09	Inadequate IU survey procedures

SECTION I: GENERAL INFORMATION

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

If yes, describe the required corrective action: _____

_____

_____

_____

_____

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

. . . . . .

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

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0022560	West	12/1/05	11/30/10
AR0022578	South	1/1/08	12/31/12
AR0022586	North	2/1/07	1/31/12

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: West
Location Address: Air Base Highway 151

Expiration Date of NPDES Permit: see above

Treatment Plant Wastewater Flow: Design- 1.5 MGD; Actual (Average)- 0.99 MGD

Sewer System: 100 % Separate; 0 % Combined, # grease related SSOs 33 in '06
(total collection system) 17 in '09

Industrial Contribution to this Treatment Plant

# of SIUs : 2 # of CIUs : 0
Industrial Flow (mgd): 0.15 Industrial Flow (%) : 15 %

Level of Treatment		Type of Process(es):
Primary	✓	Aeration
Secondary	✓	Activated Sludge/Biolac
Tertiary		

Method of Disinfection: Ultraviolet

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Ditch #27 then to left hand chute of Little River

Receiving Stream Classification: Segment 5C / St. Francis River

Receiving Stream Use: Primary/Secondary contact recreation

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	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 (specify)	dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals, NH3 & WET limits

SECTION I: GENERAL INFORMATION

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

YES NO

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

Issuing Authority: n/a
Issuance Date: _____
Expiration Date: _____

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

YES NO N/A

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

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) Passed WET for the last 5 years.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4		
Priority **	1	1		
Biomonitoring		2		
TCLP				
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.
"levels have stayed about the same"

YES NO N/A

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

___ ___ ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?
If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated	Cause(s)

YES NO

___n/a___ Has the treatment plant sludge violated the TCLP Test?

SECTION I: GENERAL INFORMATION

2. Individual Treatment Plant Information

a. Name of Treatment Plant: South
Location Address: Mississippi Ave.

Expiration Date of NPDES Permit: 10/31/02

Treatment Plant Wastewater Flow: Design- 1.4 MGD; Actual (Average)- 0.44 MGD

Sewer System: 100 % grease related SSOs see above

Industrial Contribution to this Treatment Plant

# of SIUs : 0 # of CIUs : 0
Industrial Flow (mgd): 0 Industrial Flow (%) : 0 %

Level of Treatment		Type of Process(es):
Primary	✓	Aeration
Secondary	✓	Activated sludge/biolac
Tertiary		

Method of Disinfection: Ultraviolet

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Drainage ditch #17; then #6; then #1

Receiving Stream Classification: Segment 5C / St. Francis River

Receiving Stream Use: Primary/Secondary contact recreation

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	____ 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 (specify)	____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: Conventionals, NH3-N, WET & Cu limits

SECTION I: GENERAL INFORMATION

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

YES NO

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

Issuing Authority: n/a
Issuance Date: _____
Expiration Date: _____

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

YES NO N/A

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

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) No WET failures in the last 5 years

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

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

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

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

YES NO N/A

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

___ ✓ ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?
If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated	Cause(s)
_____	_____
_____	_____

YES NO

___n/a___ Has the treatment plant sludge violated the TCLP Test?

SECTION I: GENERAL INFORMATION

2. Individual Treatment Plant Information

a. Name of Treatment Plant: North
Location Address: County Road off of North Franklin

Expiration Date of NPDES Permit: see above

Treatment Plant Wastewater Flow: Design- 0.8 MGD; Actual (Average)- 0.65 MGD

Sewer System: 100 % Separate; 0 % Combined, grease related SSOs see above

Industrial Contribution to this Treatment Plant

# of SIUs	: 6	# of CIUs	: 4
Industrial Flow (mgd):	0.47	Industrial Flow (%)	: 15 %

Level of Treatment		Type of Process(es):
Primary	✓	Aeration
Secondary	✓	Activated sludge/Biolac
Tertiary		

Method of Disinfection: Ultraviolet

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Ditch #30, then ditch #27, then left hand chute of Little River

Receiving Stream Classification: Segment 5C / St Francis River Basin

Receiving Stream Use: Primary/Secondary contact recreation

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	____	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 (specify)	____	dry tons/yr.

List of toxic pollutant limits in NPDES permit: Conventionals & NH3

SECTION I: GENERAL INFORMATION

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

YES NO

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

Issuing Authority: n/a
Issuance Date: _____
Expiration Date: _____

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

YES NO N/A

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

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

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

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

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

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

YES NO N/A

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

___ ___ ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?
If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated	Cause(s)

SECTION I: GENERAL INFORMATION

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. Revised Pretreatment Ordinance to be current with CFR 403 revisions.

1. Modifications: (non-substantial)

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit (8/1/07)
8/1/07	Draft Ordinance was submitted 8/07. Comments from this office were taken by City and it was passed. The City has since submitted the rest of the Program Mods to be current with CFR 403. Only a small portion of the rest of their Program may need to be revised.	

2. Modifications in Progress:

Date Requested	Nature of Modification
See above	No optional mods were adopted, only those required.

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

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

Date of original Pretreatment Program approval: 3/21/86 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 8/21/07
Date of most recent Pretreatment Program modification approval: 8/1/07

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

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

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

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

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

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1. n/a			

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

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

Briefly describe other problems: _____

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

✓* ___ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] **Ongoing - building a new master list.*

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

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

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

What methods are used to update the IWS:

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

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?
Turbine Support International	Rebuild jet engines	✓

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

a. 8 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 4 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 4 Noncategorical SIUs
d. 6 Other regulated nonsignificant IUs (Describe) Septage haulers

14 TOTAL of a. + d.

YES NO

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

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

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

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

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

IU NAME	PERMIT EXPIRATION DATE
n/a	

YES NO

✓ ___ Does the Control Authority accept trucked septage wastes?

___ ✓ Does the Control Authority accept other trucked wastes?

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

YES NO

✓ ___ 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
*See Attachment A-1 for general prohibitions and conditions	

Describe the discharge point(s) (including security procedures):
Haulers stop by their office for paperwork to be reviewed. Their loads are dumped in a lift station recently built behind their offices.

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

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

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

Pollutant	Limit
n/a	

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Applications of Pretreatment Standards and Requirements

YES NO

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

2/18/09 Date Notified Letter Method of Notification

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

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

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
The latest submittal included the City's MAHL evaluation indicating local limits "weren't necessary at this time."			

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		2/7/05 MAHL established
	Yes	No	Yes	No	Yes	No	lb/day
Arsenic (As)	✓			✓		✓	0.45
Cadmium (Cd)	✓			✓		✓	0.05
Chromium-Total	✓			✓		✓	4.5
Copper (Cu)	✓			✓		✓	0.74
Cyanide (CN)	✓			✓		✓	0.08
Lead (Pb)	✓			✓		✓	0.06
Mercury (Hg)	✓			✓		✓	0.0001
Molybdenum (Mo) *	✓			✓		✓	0.9
Nickel (Ni)	✓			✓		✓	2.51
Selenium (Se) *	✓			✓		✓	0.05
Silver (Ag)	✓			✓		✓	0.12
Zinc (Zn)	✓			✓		✓	1.35

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

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 was used for local limits for each pollutant that has a local limit in-place?

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

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

Most stringent MAHLs apply to all three POTWs

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1	1/year	
Other SIUs	1	1/year	
Sampling:			
CIUs	2	1/year	City performs this
Other SIUs	2	1/year	for the IUs
Reporting:			
CIUs	*	2/year	* City does
Other SIUs	*	2/year	monitoring
Self-Monitoring:			
CIUs	*	2/year	"
Other SIUs	*	2/year	"

#	%	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 twice in the past reporting year? [WENDB-NOIN]-[403.8(f)(2)(v)]

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

Does the Control Authority routinely split samples with industrial personnel:

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

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

	Analytical Method *	Name of Laboratory
Metals	ICP/MS	ETC
Cyanide	Spectro	"
Organics	GC/MS	"
Other	Pesticides fraction	American Interplex

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe: _____
Relies on state's certification program and EPA's QA program

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

5 days Conventionals
2 - 3 wks Metals
3 wks Organics

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

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

If yes, explain: _____

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

YES NO

✓ & ✓ Scheduled compliance monitoring *(inspections)*
✓ ___ Unscheduled compliance monitoring *(sampling)*
N/A Demand monitoring for IU compliance
N/A IU self-monitoring
___ ___ Other: _____

YES NO

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

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

✓ Imprisonment
✓ Termination of Service
✓ Other: severance of H2-O supply

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

YES	NO	
✓		When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
	✓	Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)]. Comment: City does all monitoring
✓		If no, does the Control Authority conduct all of the monitoring?

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

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? No
Kagome	5/09	NOV & AO	7/17		Still working on it
Nibco	10/08	NOV	11/08	12/08	

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

#	%	
		Kagome will be published next year
1	12.5	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]

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

Has the Control Authority experienced any of the following:

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

YES	NO	
✓	___	Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]
0		How many SIUs are currently on compliance schedules?
___	✓	Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

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

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

[WENDB-IUPN]

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO
✓ & ✓ Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES	NO	
✓	✓	computerized *(thinking about purchasing Linko software)*
✓	___	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 *(water billing)*
___	✓	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?
Any info would be locked in file cabinet

___ ✓ Are there significant public or community issues impacting the POTW's pretreatment program?
If yes, please explain: _____

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

K. RESOURCES

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

0.3 City should consider bringing in an additional part-time employee for cross-training in the Program's procedures.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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:
City's Pret. Coordinator could use a trainee to help fill in with more un-announced inspections & to become familiar with paperwork

		Percent of Total Funding
✓	POTW general operating fund	100
✓	IU permit fees*	*these go back into general fund
___	monitoring charges	
___	industry surcharges	
✓	other (describe) Recent surcharge	*
	Total	100%

___ ✓ Is funding expected to continue near the current level? If no, will it:
Increase ✓ or Decrease ___
If no, describe the nature of the changes:
City has just started levying a $5.00 surcharge

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 automatic (3); portable pH meters
✓	___	Safety equipment	Gas detectors, ropes, harnesses, blowers, respirators, etc
✓	___	Vehicles	2003 Ford 150
✓	___	Analytical equipment	Equipment for conventionals (BOD, TSS & NH3)

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

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

2. Has the source of any toxic pollutants been identified?
   If yes, what was found?
   none

3. Has the POTW implemented any kind of public education program? If yes, describe:
   none

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

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

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

7. City has just added an IU permit requirement to conduct a P2 assessment with the results due within one year of the effective date of permit. No progress reports could be located, but there was plenty of evidence some IUs were practicing BMPs and P2.

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Motor Appliance File/ID No. 10
Industry Address 4872 N. County Rd. 779
Industry Description Various sized battery charger manufacturer
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3621
Ave. Total Flow (gpd) ? Ave. Process Flow (gpd) 800 batched/quarter

Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name Motor Tech. (Regal Beloit) File/ID No. 6
Industry Address 4025 E. Highway 18
Industry Description Mfg and assembly of electric motor parts
Industrial Category metal finishing & Al die cast 40 CFR 433 & 464 SIC Code: 3621
Ave. Total Flow (gpd) 10,000 Ave. Process Flow (gpd) 7,500

Industry visited during audit: YES

Comments:

FILE #: 3 Industry Name Siemens (used to be SRT) File/ID No. 13
Industry Address 101 Terra Road
Industry Description Machining/Maintenance on steel mill equip. w/Cr & Ni plating
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 7692
Ave. Total Flow (gpd) 4,820 Ave. Process Flow (gpd) 117

Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name Kagome File/ID No. 9
Industry Address 2705 Casper
Industry Description Mfg oil based food products like dressings and sauces
Industrial Category n/a 40 CFR n/a SIC Code: 2699
Ave. Total Flow (gpd) ~4,400 Ave. Process Flow (gpd) 4,000 washdown

Industry visited during audit: YES

Comments:

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

Industry visited during audit: YES

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism *[See attach. A-2 for example]*

1.	Does the file contain an application for a control mechanism?	3	3	✓	✓	
	If yes, what is the application date?	10/06	10/06	10/08	7/09	
	Does it ask for Pollution Prevention information?	no	no	no	no	
2.	Does the file contain a Permit?	✓	✓	✓	✓	
	Permit Expiration Date?	12/11	12/11	12/13	5/15	
	Is a fact sheet included?	2	2	2	2	
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?	4	4	4	4	
	e. Appropriate self-monitoring requirements?	5	5	5	5	
	f. Sampling frequency?	✓	✓	✓	✓	
	g. Sampling locations?	✓	✓	✓	✓	
	h. Requirement for flow monitoring?	✓	✓	✓	✓	

Comments: 1. IUs' permits require a P2 assessment be made and submitted to the City within one year of the permit's effective date. See attach. A-2, Part I, Section D.1. None could be found; 2. City personnel is currently working on them; 3. Applications could not be located; 4. City personnel couldn't explain mass limits; 5. City does all monitoring;

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
i. Types of samples (grab or composite) for self-monitoring?	1	timed	timed	flow pr.	
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?	no	no	no	no	
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?	✓2	✓2,3	✓2	✓2	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	n/a	n/a	n/a	n/a	
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	n/a	✓	n/a	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	

Comments: 1. IU's permit says 24 hr composite, but they only batch discharge. This needs to be corrected; 2) IUs' permit limits are also in mass. City personnel couldn't explain the mass basis; 3. IU has small Al die cast quench tank. This permit has 2 outfalls and 2 sets of limits for separate sampling points for compliance with CFR 433 and CFR 464. This needs to be documented in fact sheet also.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
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?	batch	1	1	1	
e. Sample preservation procedures?	✓	✓	✓	✓	
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?	1	✓	✓	n/a	

Comments: 1. City needs to record regulated process flows, not total IU usage; 2. IU still insists on analyzing for the TTOs 1/yr

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
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 *(see attch. A-3 for example)*					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	
b. Date of last Inspection	6/10	2/10	5/09	6/10	
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	no	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	1	1	1	1	
f. Evaluation of pretreatment facilities?	no	no	no	no	
g. Evaluation of self-monitoring equipment and techniques?	n/a	n/a	n/a	n/a	
h. ~~(Re)~~Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	✓	✓	✓	✓	
i. Manufacturing facilities?	1	1	1	1	
j. Chemical handling and storage procedures?	no	no	no	no	
k. Chemical spill prevention areas?	1	1	1	1	
l. Hazardous waste storage areas and handling procedures?	1	1	1	1	

Comments: 1. IU inspections must be revised using more narrative on all aspects for a complete inspection. The one-page form had been condensed so much, it had deleted some of a good inspection's elements.

SECTION III: INDUSTRIAL USER FILE REVIEW

		FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
m.	Sampling procedures?	n/a	n/a	n/a	n/a	
n.	Laboratory procedures?	n/a	n/a	n/a	n/a	
o.	Monitoring records?	n/a	n/a	n/a	n/a	
p.	Evaluation of Pollution Prevention opportunities?	no	no	no	no	
q.	Control Authority inspector signature?	✓	✓	✓	✓	
IU Self-Monitoring and Reporting						
10.	Does the file contain self-monitoring reports?	n/a	n/a	n/a	n/a	
11.	Does the file include:					
a.	BMR?	Archived	✓	✓	n/a	
b.	90-Day Report?	"	✓	✓	n/a	
c.	All periodic reports?	n/a	n/a	n/a	n/a	
d.	Compliance schedule reports?	n/a	n/a	n/a	n/a	
12.	Did the IU report on all required parameters?	n/a	n/a	n/a	n/a	
13.	Did the IU comply with the required sampling frequency(s)?	n/a	n/a	n/a	n/a	
14.	Did the IU report flow?	n/a	n/a	n/a	n/a	
15.	Did the IU comply with the required reporting frequency(s)?	n/a	n/a	n/a	n/a	
16.	For all SIUs, are self-monitoring reports signed and certified?	n/a	n/a	n/a	n/a	
17.	Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	
18.	Has the IU developed a Slug Control and Prevention Plan?	1	1	1	?	
19.	Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	

Comments: 1. Some IUs have developed a SPCC/Slug control plan, some the City determined they didn't have the potential.

SECTION III: INDUSTRIAL USER FILE REVIEW

If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	n/a	n/a	n/a	n/a	
b. Did POTW respond to the spill?	n/a	n/a	n/a	n/a	

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	n/a	n/a	n/a	n/a	
b. IU self-monitoring results?	n/a	n/a	n/a	n/a	
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?	0	0	0	1	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	n/a	n/a	n/a	1	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	n/a	n/a	✓	
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	
6. Was the IU notified of all violations?	n/a	n/a	n/a	n/a	
7. Was follow-up enforcement action taken by the Control Authority?	n/a	n/a	n/a	n/a	
8. Did the Control Authority follow its approved ERP?	✓	✓	✓	✓	

Comments: 1. City caught their grease trap overflowing. They were placed under and Administrative Order and assessed penalties.

SECTION III: INDUSTRIAL USER FILE REVIEW

Enforcement (continued)

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	n/a	n/a	n/a	1	
10. Is there a compliance schedule? If yes:	no	no	no	2	
11. Were there any compliance schedule violations?	n/a	n/a	n/a	no	
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?	n/a	n/a	n/a	no*	
Date of publication.	n/a	n/a	n/a	n/a*	

Comments: * Will be published during the next Pretreatment year; 1. IU is still under the AO so compliance is pending; 2. Compliance schedule is rather short and this auditor did not get a copy.

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Blytheville NPDES #: AR0022560

Date of Audit: 6/22 - 6/24/10 Date entered into QNCR: _____

(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
YES	Other violations of concern Minor administrative deficiencies	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 Blytheville NPDES #: AR0022560

Name, address and phone number of industry:

Motor Appliance Corp. Industrial Drive; P.O. Box 1077; 870.763.3652

Type of industry: Metal Finisher Date/Time of visit: 6/23/10; 9:35 a.m.

Contacts: Steve Smith/General Manager

		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 hasn't changed operations substantially from the previous audit about three years ago.

Facility manufactures the Al or cold rolled steel (~50/50) enclosures and assembles assorted sizes of battery chargers. Most of the operations include some stamping and machining of the enclosures prior to powder coating and assembly of various parts for the finished product. The aluminum is not sent thru the phosphatizing operation.

Visit conducted by: Gilliam/Yankee Date: 6/23/10

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Blytheville NPDES #: AR0022560

Industry name: Motor Appliances

Additional Comments: Some parts come in plastic coated.

Wastewater operations which fall under CFR 433 (metal finishing) is only the Fe phosphatizing which consist of a typical spray booth with 2 stages. The first stage contains the Fe phosphate followed by the fresh city-water rinse (450 gallons). It wasn't clear exactly how many gallons per batch were discharged about every other month. Facility rep calls the city when they're ready to discharge. pH of the phosphate tank runs near 3.5 s.u.

After the "cleaning" stage, parts are air dried and sent thru the electrostatic paint booth then into the "bake" oven. They switched to powder coat back in '95 or '96.

Permit limits are straight out of CFR 433.

Assembly area takes up the bulk of the area of the building. Area appeared clean with no obvious wastewater, chemical leakages nor floor drains.

Boxes are formed, punched and machined prior to going to cleaning process.

Very little chemical storage near that area.

Chemicals are brought in on pallets via fork lifts.

Facility also has a very small wave soldering (a tin alloy) box which is self contained with no discharge.

Facility makes about 250 units/day for the smaller units and about 15 to 30/day for the larger units.

No slug potential observed by this auditor.

Adequate sampling point.

Visit conducted by: Gilliam/Yankee Date: 6/23/10

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Blytheville NPDES #: AR0022560

Name, address and phone number of industry:

Motor Technologies, 4025 E. Highway 18, 870.776.1297

Type of industry: CFR's 433 & 464 Date/Time of visit: 6/23/10; 10:55 a.m.

Manufacturer of electric motors Contacts: Lana Smith & "Billy" cast operator

		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 manufacturers the rotors/cores for medium to large sized electric motors (40 to 680 hp). IU has not changed operations substantially since the audit conducted about 3 years ago. Very little Al is poured/day. Process begins with numerous wafer thin steel rotor laminations being injected with semi-molten aluminum. This process does not "fit" the traditional aluminum die casting operations (under CFR 464) as there are no molds nor dies and aluminum is basically pressured into the wafers' voids to fill the rotor cores. The "casting" stations have non-contact cooling water jackets with no process wastewater associated.

Any hydraulic leakages are contained/absorbed and shipped off-site.

Visit conducted by: Gilliam/Yankee Date: 6/23/10

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Blytheville NPDES #: AR0022560

Industry name: Motor Technologies

Additional comments: The heated cores are dipped in a fresh city water quench tank (250 gallons) with some overflow wastewater discharged on an infrequent basis at a negligible rate to sample. This appears to be covered under subprocess (b) of CFR 464.16, but this auditor deems it negligible. Some quick calculations suggested their limits would be so large because of the very small quench tank discharge volumes, it could be ignored.

The rotors are further air cooled and again heated prior so a steel shaft can be hammered (brass) through it. They're once again sent through a 300 gallon quench tank. Rotors assemblies are then sent through a 5 stage phosphatizing operation (dip type, not spray booths): alkaline wash, water rinsed, iron phosphatized, water rinsed, then followed by a reverse osmosis water rinse. Most rinses are counter current flowed. Each of these 5 tanks hold about ~1900 gallons. Gate valves under each tank could accidently be opened, therefore, a slug potential exists. This was again discussed with the IU and City representatives.

The R/O and the second rinse are continually overflowing but the other 3 tanks are batch discharged ~once/3 months. Seemed to be some confusion on when the 3 tanks were batch discharged and a better line of communication should be built between the IU and the City's coordinator for representative sampling.

Rotors/stator assemblies are once again sent through a dry off oven prior to a self-contained primer dip paint tank followed by a final bake off oven. There was one floor drain in the paint area.

Remaining operations include copper winding and final assembly.

Chemical storage areas (barrels) as well as how the various chems were transferred from one station to another ("hand carried buckets"?) was discussed.

No pretreatment is necessary to meet the existing CFR 433 limits.

Visit conducted by: Gilliam/Yankee Date: 6/23/10

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Blytheville NPDES #: AR0022560

Name, address and phone number of industry:
Steel Related Technologies, 101 Terra Road, 870.762.1906
Type of industry: Metal Finishing (Ni & Cr Plating) Date/Time of visit: 6/23/10 / 1:20 p.m.
Machinery/equip. repair/cleaning/Electroplating for local steel mills equipment
Industry contacts: Keith/Maint. Supv.; Josh Callis/Safety Dir.; Lendall Yeater/Plating Supv.

		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: Steel Related Technologies (SRT) conducts Ni & Cr plating on selected parts that are cleaned for the iron and steel mills in the area. Prior to Ni plating heavy steel industry "molds" (huge bearing systems) are cleaned with high pressure (2500 psi) hot water. Any solvents used in cleaning of the bearings are in self contained areas and are hauled off-site. It appeared the existing drawings were not up to date and the IU will have to provide the city with the most current and accurate drawings. Facility has recently added a chrome plating process for some of the steel mills' long rollers (for pressing steel into sheets). The chrome plating "tank" was a long cylindrical "housing" which stood upright. Rinse waters from this process are also pumped back to the pretreatment tank. This "bath" also has a composite mesh wet fume scrubber above it with an evaporator to remove excess water.

Visit conducted by: Gilliam/Yankee Date: 6/23/10

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Blytheville NPDES #: AR0022560

Industry name: Steel Related Technologies

Additional comments:

The Ni plating ops were comprised of an "activator" rinse (10% sulfuric & 4% Hydrogen Peroxide), 3 separate slightly heated Ni plating tanks: post Ni plate, sulfamic Ni plate followed by a final Ni plate bath. Plating occurs at ~0.001"/hr for a total of 20 thousands of an inch plate. It takes about 2 days for this process on the "caster molds". Ni plating wastewater is hand pumped in a batch as needed to a holding tank and pretreated by chemically precipitation with polymers. The IU samples for compliance before notifying city they're ready to dump. A filter press is in use as well as De-I water rinse (City water has too much calcium in it). The filter press w.w. is routed back to the treatment system as necessary. The entire plating line is in a pit for secondary containment and is fiberglass "lined" (coated). The Ni plating process has not changed since the audit 3 years ago except they've replaced tank air-agitation to pumps with filtration. Current sampling for this plating line is at the final holding tank (800 to 1000 gallons batch discharged/month). Every tank has an alarm with it. This auditor would deem there's a very small chance for a slug load to the City.

Other wastewater generated at the facility is from the pressure testing of the bearings' cooling nozzles and the steam wash area where the floor is sloped via floor drains where it gravity flows through 3 separate in-ground basic clarifiers (settling tanks), each with a weir system for oil removal. Wastewater is then pumped into three additional outside final clarifiers (pits) prior to discharge to the city.

Some basic machining is performed at 7 self-contained CNC stations and scrap metal is hauled off-site for recycle.

The sampling points and exact routing of regulated streams needs to be revised by the facility and submitted (and dated) to the City. This was all discussed during the site visit.

Visit conducted by: Gilliam/Yankee Date: 6/23/10

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Blytheville NPDES #: AR0022560
Name, address and phone number of industry:
Kagome Creative Foods; 2705 Casper 870.532.6192
Type of industry: Iron Foundry Date/Time of visit: 6/24/10 / 9:10 a.m.

Industry contacts: Jeff Yopp / Operations Manager

		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: Plant was temporarily shut-down so we didn't have to clean-suit up with hair nets, "booties", ets.
Facility produces sauces and dressings for various food related companies. Oils are used to mix (chilled) with various customer flavors and spices. Very small production area all stainless steel. They have two lines/mix tanks. Mixes are sent over to the fillers. Product is pumped into small plastic "cups", lids are placed on and sealed with a small heat unit.
Pollution Prevention was not discussed. And it appeared this facility would probably have a low potential for a slug discharge.

Visit conducted by: Gilliam/Yankee Date: 6/24/10

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Blytheville NPDES #: AR0022560

Industry name: Kagome Creative Foods

Additional comments:

Product is sterilized, packaged into larger containers left to chill ready for shipment. All washdown water gravity flows through one floor drain to a manhole outside. Construction is underway to install a small DAF unit (25 gpd?). Two diaphragm pumps (one as back-up) will pump the wastewater from the MH up to a holding tank. Fluids will be pulled off the bottom of this holding tank leaving the oils at the top. A float system will be used to sense water depth, then sent to the DAF unit. Polymers will be used to float any oils to the top of the DAF where skimmers will pull those it over to another holding tank. That oil will be pumped out and taken off-site. All new materials are going into this construction.

A suitable sampling point was also being constructed.

Visit conducted by: Gilliam/Yankee Date: 6/24/10

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

CITY OF BLYTHEVILLE, ARKANSAS
BLYTHEVILLE WASTEWATER DEPARTMENT
HAULED WASTEWATER DISCHARGE PERMIT

Permit No: **12**

In accordance with all terms and conditions of ***City Ordinance # 1594*, (Pretreatment Program)** and also with any applicable provisions of Federal or State Law or regulation:

Permission Is Hereby Granted To: ***HEDGE'S, INC., dba ROTOROOTER***
1705 NORTH 8th AVENUE
PARAGOULD, ARKANSAS 72450

And is hereby authorized to discharge hauled wastewater to the Blytheville Wastewater Department's sewer system located at ***The Shop Pumping Station Only (Behind Office)*** 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 regulation, standards, requirements, or laws that may become effective during the term of this permit.

Non-compliance with any term or condition of this permit shall constitute a violation of the **City's Pretreatment Program or Ordinance # 1594.**

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of *Ordinance # 1594*, a minimum of 90 days prior to the expiration date.

Effective this ***1st*** day of ***JUNE, 2010***

To expire the ***30th*** day of ***MAY, 2014.***

PRETREATMENT COORDINATOR

SECTION I - DISCHARGE REQUIREMENTS

A. The discharge of all hauled wastewater must be performed at the following designated area: ***Shop Pumping Station (Behind Office Area).***

Discharge to the Blytheville Sewer System at any other location is prohibited.

In all cases, discharges may only be performed ***Monday*** thru ***Friday 7:00 am to 4:00 pm***.

No waste will be excepted on the following holidays: **New Years Day, M.L.K. Day, Presidents Day, Good Friday, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving and the Friday following, Christmas Eve and Christmas Day.**

B. Hauled wastewater is subject to sampling and analysis by the Blytheville Wastewater Dept. The waste hauler may also be required to suspend the discharging of waste's until analysis is complete. Any sampling or analysis performed will be at the waste haulers expense.
C. Chemical / Portable toilet waste is accepted only in approved volumes or amounts.

SECTION II - SPECIFIC LIMITATIONS

A. Any waste that may cause pass thru of pollutants or interference with wastewater treatment plant operations or that violates Federal, State, or local restrictions shall not be discharged to the collection system or treatment plant(s).

B. The permittee is prohibited from discharging wastes with the following characteristics:

1. Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases;
2. Containing any ashes, cinders, sand, mud, straw, shavings, metals, glass, rags, feathers, tar, plastics, wood, paunch, manure, or any other solids or viscous substances capable of causing obstructions or other interferences with proper operation of the sewer system.
3. Material considered a hazardous waste under the Resource Conservation and Recovery Act. (RCRA)

ATTACHMENT A - SIGNATORY AUTHORIZATION

All reports and information submitted pursuant to the requirements of this discharge permit will be signed and certified by an **authorized signatory** of the Permittee. In accordance CFR Part 403.12(i), an authorized signatory is:

(1) A responsible corporate officer, if the user is a corporation; a responsible corporate officer means (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;

(2) A general partner or proprietor if the user is a partnership or sole proprietorship respectively; or

(3) A duly authorized representative of the individual designated in (1) or (2) of this definition if (i) the authorization is made in writing by the individual described in (1) or (2) of this definition, and (ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company, and (iii) the written authorization is submitted to the Control Authority.

_____ Effective Date	If authorized signatory at left is a (3) above, she/he is authorized by:
_____ Authorized Signatory (Print)	_____ Name (Print)
_____ Authorized Signature	_____ Signature
_____ Title	_____ Title

Authorization Revoked by:

_____ Signature of a Current Authorized Signatory	_____ Date Revoked

Attachment A-2

CITY OF BLYTHEVILLE, ARKANSAS
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO. 10

MOTOR APPLIANCE CORPORATION
P.O. BOX 1077
BLYTHEVILLE, AR 72316

has been classified as ***40 CFR 433*** because of its ***METAL FINISHING*** operations. ***MOTOR APPLIANCE CORPORATION*** shall maintain compliance with the provisions and conditions of the ***Discharge and Pretreatment Regulations in Ordinance # 1594 of 40 CFR 433,*** and also with any applicable provisions of local, federal or State of Arkansas laws or regulations, hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by ***SIC No. 347X*** , from premises located at the above address and through outfalls identified herein to the City of Blytheville's POTW collection system in accordance with effluent limitations, monitoring requirements, compliance schedule, reporting requirements, and conditions set forth in this permit and in the City of Blytheville's Pretreatment Program.

Noncompliance with any term or condition of this permit shall constitute a violation of the Blytheville Pretreatment Program.

This permit shall become effective on ***JANUARY 1, 2007*** and authorization to discharge shall expire at midnight on ***DECEMBER 31, 2011***. The duration of this permit shall not exceed 5 years.

If the Permittee wishes to continue discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with requirements of the Discharge and Pretreatment Regulations of the Blytheville Pretreatment Program, a minimum of 90 days prior to the expiration date.

Signed this _____ day of _____, 2007.

Approved By: _____

Pretreatment Coordinator

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ATTACHMENT A - SIGNATORY AUTHORIZATION A-1

PART I - SPECIFIC CONDITIONS, LIMITATIONS, AND REQUIREMENTS

SECTION A. WASTESTREAM LOCATIONS

Location 001

The wastewater flow the metal finishing process tank flows directly to Location 001. Location 001 shall be a manhole that is located outside approximately seventy-five feet from the west wall of the facility.

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to discharges from **Location 001.**

Table I-1

Parameter	LIMITATIONS[1]				MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average		Frequency[2]	Sample Type
	(mg/l)	(lb/day)	(mg/l)	(lb/day)		
Cadmium, total	0.11	0.106	0.07	0.057	2-times/annually	24-hr composite
Chromium, total	2.77	2.135	1.71	1.160	2-times/annually	24-hr composite
Copper, total	3.38	1.948	2.07	1.059	2-times/annually	24-hr composite
Lead, total	0.69	0.557	0.43	0.302	2-times/annually	24-hr composite
Nickel, total	3.98	2.601	2.38	1.413	2-times/annually	24-hr composite
Silver, total	0.43	0.257	0.24	0.140	2-times/annually	24-hr composite
Zinc, total	2.61	4.577	1.48	2.487	2-times/annually	24-hr composite
Cyanide, total[3]	1.20	0.140	0.65	0.076	2-times/annually	Grab
Oil & Grease	100	-	-	-	2-times/annually	Grab
TTO, 40 CFR 433	2.13 mg/l		Report		2-times/annually	24-hr composite
T.S.S.	300		-		2-times/annually	24-hr composite

[1] The Permittee must monitor for TTO (Total Toxic Organics) at a frequency of one time every six months until a Toxic Organics Management Plan (TOMP) is developed and approved. On approval, certification statements are required in each monitoring report in lieu of TTO monitoring. Any TTO analysis performed according to the methods in 40 CFR 136 must be submitted in the monitoring reports and is limited as specified in this table.

[2] Temperature shall not exceed 140 degrees F or 40 degrees C.

[3] The p.H. shall be maintained between a 5.0 minimum and 10.0 maximum at all times.

SECTION C. COMPLIANCE SCHEDULE

The Permittee shall achieve compliance with the effluent limitations specified for discharges on the effective date of this permit.

SECTION D. OTHER SPECIFIC REQUIREMENTS

1. Pollution Prevention

The Permittee shall conduct a pollution prevention assessment and submit the results to the Industrial Pretreatment Coordinator (IPC) within 1 year of the effective date of this permit.

PART II - STANDARD MONITORING, RECORD KEEPING & REPORTING REQUIREMENTS

SECTION A. MONITORING

1. Monitoring by Approved Methods

Sampling and analyses must be conducted according to procedures approved under 40 CFR Part 136, unless other procedures have been specified in this permit. The Permittee shall insure that both calibration and maintenance activities will be conducted on all monitoring and analytical instrumentation at intervals frequent enough to ensure accuracy of measurements. An adequate analytical quality control program shall be maintained by the Permittee or State approved commercial laboratory. At a minimum, spikes and duplicate samples are to be analyzed on 10% of the samples where applicable.

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 this monitoring shall be included in the calculation and reporting of the data submitted in the industrial monitoring reports.

2. Sampling Facility and Monitoring Equipment

The Permittee shall provide a suitable sampling facility(s) together with such necessary manholes, meters and other equipment to facilitate observation, sampling and measurement of the process and/or combined wastes from the permitted discharge.

Such facility(s) and other appurtenances shall be accessibly and safely located and shall be constructed in accordance with plans approved by the Industrial Pretreatment Coordinator and shall be constructed, operated, and maintained at the Permittee's expense.

Such facility(s) and other appurtenances shall be maintained to be safe and accessible at all times and shall be made available for use by the Industrial Pretreatment Coordinator for monitoring and/or sampling upon request.

3. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring point(s) specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestreams, body of water, or substance. Monitoring points shall not be changed without notification to, and approval of, the Industrial Pretreatment Coordinator.

4. 24-Hour Reporting and Automatic Resampling

If the results of the sampling analysis indicates that a violation of this permit has occurred, the Industrial Pretreatment Coordinator (IPC) will inform the Permittee of the violation within 24 hours of becoming aware of the violation. The IPC shall repeat the sampling and analysis and submit the results of the repeat analysis to the Permittee within 30 days of becoming aware of the violation.

The IPC may waive the resampling requirement if the IPC performs sampling at the Permittee at least once per month, or the IPC 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.

5. Flow Measurement Devices and Method

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected, provided, used, calibrated and maintained by the Permittee to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained by trained personnel to insure that the accuracy of the measurement is consistent with the accepted capability of that device. A calibration log shall be maintained and must include dates of service and calibration, who performed the calibration and the methods used in the calibration. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes. The Industrial Pretreatment Coordinator shall be allowed to check or request a check of the calibration of the system at any time.

SECTION B. RECORD KEEPING

1. Retention of Records

The Permittee shall retain records of all monitoring information resulting from monitoring activities, including all calibration and maintenance records, 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 (3) years from the date of the sample, measurement, report, or application. This period may be extended by request of the Industrial Pretreatment Coordinator at any time.

All records which pertain to matters which are the subject of enforcement or litigation activities pursuant hereto 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.

2. Record Contents

Records and monitoring information shall include:

a. The exact date, location, time and method of sampling;
b. The individual(s) who performed the sampling or measurement;
c. The date(s) analyses were performed;
d. The individual(s) who performed the analyses;
e. The analytical techniques or methods used;
f. The results of all required analyses;
g. Laboratory QA/QC results; and
h. Chain of Custody documentation.

3. Manifest of Wastes Removed

The Permittee shall provide a manifest or other record of wastes removed by the pretreatment system and method(s) of disposal. These records shall be made available to the Industrial Pretreatment Coordinator upon request.

4. Duty to Provide Information

The Permittee shall furnish to the Industrial Pretreatment Coordinator (IPC) within a reasonable time, any information, including that requiring additional monitoring and/or analyses, which the IPC may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit or to determine compliance with this permit. The Permittee shall also furnish, upon request, copies of records required to be kept by this permit.

5. Availability of Data

Information included in or pertaining to this permit or any information obtained during or as a result of inspection or other monitoring shall be made available to any agency regulating this program and to the public, to the extent provided by 40 CFR Part 2.302 (Public Information) and 40 CFR Part 403.14 (Confidentiality).

SECTION C. REPORTING

1. Discharge Monitoring Report

No later than the 21st day of each month the Permittee shall provide the Industrial Pretreatment Coordinator (IPC) with a summary report of pollutant discharges for the previous calendar month. The report shall include:

a. Industry name and address;

b. Industry contact name;
c. Industrial waste discharge permit number;
d. Category;
e. Monitoring location(s);
f. Reporting period;
g. Sample dates;
h. Pollutant limits;
i. Daily pollutant concentrations, mass, and units;
j. Monthly average pollutant concentrations, mass, and units;
k. Daily flow for wastewater discharge on all monitoring days, and average daily and total monthly flow for water usage and wastewater discharge;
l. Compliance statement;
m. TTO certification statement if a TTO plan has been approved:
"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority."
n. Certification statement:
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
o. Signature of authorized signatory (See Attachment A).

2. Compliance Schedule Reporting

If construction or placement of facilities or equipment is required to meet limitations, requirements, and/or conditions of this permit, a proposed compliance schedule shall be submitted by the Permittee within fourteen (14) days of the effective date of this permit unless otherwise specified.

Compliance schedules shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment facilities and procedures required for the user to meet the applicable pretreatment standards (e.g., hiring an engineer, completing preliminary plans, completing final plans, executing contracts for major components, commencing construction, completing construction, etc.).

No increment shall exceed 9 months nor shall the entire schedule exceed 18 months.

Reports of compliance or noncompliance with, or any progress reports on interim and final

requirements contained in any compliance schedules of this permit shall be submitted no later than fourteen (14) days following each schedule date. Any reports of noncompliance shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

3. Averaging Measurements and Detection Limits

Calculations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this permit. If a result is less than the detection limit, the detection limit is used to determine compliance, to calculate averages, and to calculate mass.

4. Notification of Unusual Loadings

The Permittee shall immediately notify the Industrial Pretreatment Coordinator once aware of any unusual loadings released to the wastewater collection system and shall take immediate appropriate action to mitigate any adverse effects of such loadings, including ceasing of processing operations, if required.

5. Planned Changes

The Permittee shall submit prior notice to the Industrial Pretreatment Coordinator, if possible at least 30 days before any planned change in production or treatment process or any planned physical alterations or additions to the permitted facility.

This notification shall be in writing and shall apply to all pollutants whether limited by this permit or not and to any activity which would result in the discharge of those pollutants to the POTW.

6. Notification of Shutdown

Notification of any shutdown period of more than (2) days shall take place at least 48 hours prior to the shutdown period. Notification of any shut down period of more than (5) days shall be in writing and shall take place at least (2) weeks prior to the first day of shutdown. Notification shall be given to the Industrial Pretreatment Coordinator (IPC) and shall include the following:

a. the date shutdown will start;
b. the last shift to work on the date of shutdown;
c. the date process operations will resume; and
d. the first shift to work on the date of startup.

The strength and characteristics of the wastewater load that is generated during any significant shutdown period shall be approved by the IPC.

7. Anticipated Noncompliance

The Permittee shall submit prior notice to the Industrial Pretreatment Coordinator, if

possible at least 30 days before to any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

8. Twenty-four Hour Reporting (Bypass, Upset, Spill, Slug, or Noncompliance)

The Permittee shall notify the Industrial Pretreatment Coordinator immediately, but no later than twenty-four (24) hours from the time the Permittee becomes aware of the occurrence of any bypass of the treatment system, upset which places the Permittee in a temporary state of noncompliance, any potentially harmful spill, accidental or slug discharge, or any noncompliance which may endanger health, the environment, or operation of the POTW. The notification shall include location of discharge, date and time thereof, type of waste including concentration and volume, and corrective actions taken. The Permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements under local, State, or federal laws.

Written notification of the accidental discharge shall be made to the Industrial Pretreatment Coordinator within five (5) days and shall contain:

a. A description of the event and its suspected cause;
b. The duration of the event, including exact dates and times;
c. The impact of the event on the Permittee's compliance status;
d. If cessation of the event has not occurred, the anticipated period of time it is expected to continue; and
e. Steps taken or planned to reduce, eliminate, and prevent recurrence of the event.

9. Other Noncompliance

The Permittee shall report all instances of noncompliance at the time monitoring reports are submitted unless otherwise required.

10. Certification in Lieu of Monitoring

A Permittee subject to total toxic organics limitations may be allowed to submit a Toxic Organic Management Plan (TOMP) with prior approval of the Industrial Pretreatment Coordinator (IPC). If a TOMP has been approved by the IPC, the Permittee must submit a certification statement as part of the semi-annual report (or more frequently, if more frequent reporting is required) certifying compliance with the approved TOMP.

11. Signatory Requirements

All reports or information submitted pursuant to the requirements of this permit must be signed and certified by an authorized signatory of the Permittee. Signed copies of a Signatory Authorization Form (Attachment A) must be submitted to the Industrial Pretreatment Coordinator for any individual to be considered an authorized signatory. See Attachment A for the definition of an authorized signatory.

Any authorized signatory signing reports or information submitted in accordance with this

permit shall make the following written certification:

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.

12. Address for Report Submissions

All reports and notices required by this permit shall be submitted to:

Blytheville Wastewater Department
Attn.: Industrial Pretreatment Coordinator
P.O. Box 1784
4834 N.C.R. 639 (Half Moon Rd.)
Blytheville, AR 72316

(870) 763-4961

PART III - STANDARD CONDITIONS

SECTION A. GENERAL CONDITIONS

1. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation.

2. Limitations Subject To Revision

Any changes in EPA, State of Arkansas, or local applicable regulations shall supersede this permit. The Permittee will be notified of the changes and required to develop a compliance schedule if changes in the Permittee's treatment processes or facilities are necessary to insure compliance with the regulatory changes.

These specific limitations are subject to revision if and at such time as the effluent limitations and other requirements of the POTW are revised.

These specific limitations are subject to revision if and at such time as it is determined that discharge from the Permittee is or has become detrimental to the public health or safety, the health or safety of the operators of the POTW, the biological or structural integrity of the POTW including the collection system, and/or the protection of the receiving waters.

3. Property Rights

This permit does not convey any property rights in either real or personal property, 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.

4. Regulatory Changes

Any changes in EPA, State, or local pretreatment regulations that are more stringent than the requirements of this permit shall supersede this permit. The Permittee will be notified of the change and required to develop a compliance schedule if changes in the Permittee's treatment process or facility are necessary to insure compliance with the regulatory change(s).

5. Toxic Pollutants

If a toxic effluent standard or prohibition is established for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit may be revised or modified in accordance with the toxic effluent standard or prohibition and the Permittee so notified.

6. 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.

7. Permit Modification, Revocation, Suspension, Termination

This permit may be modified, revoked and reissued, suspended, or terminated with cause in accordance with the requirements of the Discharge and Pretreatment Regulations subchapter of the Pretreatment Program and/or State or federal regulations, or for other good cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, suspension, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

8. Permit Transfer

This permit may be transferred to a new owner or operator if the Permittee gives at least seven (7) days advance notice to the Control Authority and the Control Authority approves the wastewater discharge permit transfer. The notice to the Control Authority must include a written certification by the new owner or operator which:

a. States that the new owner and/or operator has no immediate intent to change the facility's operations and processes;
b. Identifies the specific date on which the transfer is to occur; and
c. Acknowledges full responsibility for complying with the existing wastewater discharge permit.

9. Duty to Reapply

The Permittee is responsible for filing an application for reissuance of the permit at least ninety (90) days before the expiration date of this permit.

10. Continuation of Expired Permits

If on the date of expiration of this permit, a new permit has not been issued, the requirements and limitations of this permit shall continue to be effective and enforceable unless the Permittee has received notice of suspension, revocation and/or termination of the permit.

SECTION B. OPERATION AND MAINTENANCE

1. Proper Operation and Maintenance

The Permittee shall at all times maintain in good working order and operate as efficiently as possible all facilities and systems of treatment, control, sampling, measurement and/or analysis installed or used by the Permittee to achieve compliance with the terms and

conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate process control.

2. Need to Halt or Reduce Not a Defense

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Duty to Mitigate

The Permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health, the POTW treatment facility, the waters receiving the POTW treatment facility discharge, or the environment.

Reasonable steps include but are not limited to accelerated or additional monitoring and/or analyses necessary to determine the nature and impact of the noncomplying discharge.

4. Bypass of Treatment System

Bypass of the treatment system is prohibited, unless:

a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
b. There was no feasible alternative to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime;
c. The Industrial Pretreatment Coordinator approved an anticipated bypass, considering its adverse effects, if the Permittee, knowing in advance of the need for a bypass, submitted prior notice in writing at least ten (10) days before the bypass; or
d. The bypass does not cause effluent limitations to be exceeded.

5. Affirmative Defense

An upset may constitute an affirmative defense for action brought for the noncompliance. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation. The Permittee has the burden of proof to provide evidence and demonstrate that none of the factors specifically listed above were responsible for the noncompliance.

A Permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An upset occurred and that the Permittee can identify the specific cause of the upset;
b. The permitted facility was at the time being properly operated; and

c. The Permittee submitted notice of the upset as required.

6. Removed Substances and RCRA Requirements

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of waste waters shall be disposed of in a manner such as to prevent any pollutants from such materials from entering the sewer system. The Permittee is responsible to assure its compliance with any requirements regarding the generation, treatment, storage, and/or disposal of hazardous wastes as defined under the Federal Resource Conservation and Recovery Act and State of Arkansas rules and regulations relative to refuse, liquid and/or solid waste disposal.

7. Disposal of Sludges and Spent Chemicals

The Permittee shall dispose of sludges and spent chemicals in accordance with procedures in Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

8. Emergency Action

In the event of a power loss to the Permittee's treatment facility, the Permittee shall provide treatment to the best of his ability and shall report immediately to the Industrial Pretreatment Coordinator any noncompliance resulting from the emergency situation.

9. Dilution Not Permitted

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

SECTION C. RESULTS OF NONCOMPLIANCE

1. Duty to Comply

The Permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Pretreatment Program and may be grounds for enforcement action.

2. Penalties for Violations of Permit Conditions

The Permittee is subject to a civil or criminal penalty of not more than $1000.00 per violation per day for each day that the Permittee is in violation of the requirements of this permit, the pretreatment standards, or City Ordinance # 1594.

3. Permit Suspension, Revocation and Termination

This permit may be suspended, or revoked and terminated in accordance with the

requirements of the Pretreatment Regulations of the City of Blytheville Ordinance # 1594 and/or the approved Enforcement Response Plan.

4. Tampering

Any person who falsifies, tampers with, or knowingly renders inaccurate, any monitoring device or method required to be maintained under this permit shall be subject to civil and/or criminal penalties.

5. Falsification of Reports

The Pretreatment Program provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than one thousand dollars ($1000.00) per day.

6. Publication in Newspaper for Significant Noncompliance

The Pretreatment Program provides that, in accordance with 40 CFR 403.8(f)(2)(vii), an industrial user will be published at least one time annually in a newspaper(s) of general circulation within the jurisdiction(s) served by the POTW when found to be in significant noncompliance. An industrial user is in significant noncompliance if its violations meet one or more of the following criteria:

a. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent or more of all of the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter;

b. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH);

c. Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the Control Authority determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public);

d. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of this section to halt or prevent such a discharge;

e. Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction,

completing construction, or attaining final compliance;

f. Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;

g. Failure to accurately report noncompliance;

h. Any other violation or group of violations which the Control Authority determines will adversely affect the operation or implementation of the local pretreatment program.

7. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the Permittee from civil and/or criminal penalties for noncompliance under local, State or Federal laws or regulations.

PART IV - OTHER REQUIREMENTS

SECTION A. RIGHT OF ENTRY

The Permittee shall allow any authorized representative of the EPA, State of Arkansas, or City of Blytheville pretreatment program, bearing proper credentials and identification:

1. To enter upon the Permittee's premises where a real or potential discharge is located or records are required to be kept under the terms and conditions of this permit;

2. To have access to and copy records required to be kept under the terms and conditions of this permit; to inspect any facility, materials storage or monitoring equipment; to observe monitoring practices, process or facility operations; to sample any discharge; and

3. Where the Permittee has security measures in force which require proper identification and/or clearance before entry onto said Permittee's premises is granted, such Permittee shall make the necessary arrangements with the security guards that upon presentation of proper identification, the IPC shall be permitted to enter without delay. The Industrial Pretreatment Coordinator shall have access to production, materials storage, and wastewater pretreatment areas as well as operating, monitoring, and pretreatment records of the Permittee Plant. Access shall be granted immediately upon request at any time deemed necessary provided proper identification is provided by the entrant.

SECTION B. BOILER SYSTEM

No chemicals other than chlorine, inorganic acids and inorganic bases (e.g., sulfuric acid, sodium hydroxide, etc.) are to be used in the boiler system without prior written approval from the Industrial Pretreatment Coordinator. In requesting permission to use chemicals in the boiler system, the Permittee must provide the following information:

1. Name of chemical compound (trade name and/or brand name);
2. Name and address of manufacturer and name and telephone number of local representative;
3. Copy of the Material Safety Data Sheet; and
4. Proposed application rates and frequency of application.

SECTION C. ACCIDENTAL SPILL/SLUG PREVENTION PLAN

If the Permittee does not have one, an Accidental Spill/Slug Prevention Plan (ASPP) shall be developed and submitted for approval.

Failure of the plan to prevent violations of any other provisions of this permit in no way relieves the Permittee from its legal liability for noncompliance with the permit conditions.

As a minimum, the ASPP must address the following:

1. Chemical storage areas;

2. Chemical loading and unloading areas;
3. Process tanks; and
4. Removing process tanks from service.

For each of the above categories, describe:

a. Proximity to the sanitary sewer system;
b. Material compatibility;
c. Transfer of chemicals;
d. Housekeeping/inspections;
e. Secondary containment;
f. Spill contingency; and
g. Batch treatment.

The ASPP must provide for notification of spill events to the proper authorities, including the POTW. The following information must be included in the plan under notification to the POTW and should be posted on a chain-of-contacts list on information boards and in other appropriate areas throughout the plant:

PART V - DEFINITIONS

A. **CFR** means Code of Federal Regulations

B. **Composite sample** means a sample usually comprised of a minimum of twelve (12) aliquots collected over a period of no more than twenty-four (24) hours. If the daily discharge is less than (24) hours, a minimum of (4) aliquots per day at equal time intervals should be taken.

C. **Control Authority** means the local agency regulating the local pretreatment program and its authorized representatives including, but not limited to, the Industrial Pretreatment Coordinator.

D. **Discharge** means an intentional or unintentional action or omission resulting in the releasing, spilling, leaking, pouring, emitting, emptying, or dumping of a pollutant into the waters of the State or the US, or onto land or into wells from where it might flow or drain into said waters onto lands outside the jurisdiction of the State. Discharge includes the release of any pollutant into a POTW.

E. **Blytheville Pretreatment Program** means the City of Blytheville Ordinance # 1594.

F. **Flow proportioned** means a composite sample that is collected proportional to each stream flow at time of collection of each aliquot or to the total flow since the previous aliquot. Sampling may be flow proportioned either by varying the volume of each aliquot or the time interval between each aliquot. If discrete sampling is employed, at least 12 aliquots should be composited.

G. **Grab sample** means an individual sample collected over a period of time not to exceed 15 minutes. It is a single sample and is representative of conditions and characteristics of the discharge at the time it is collected.

H. **Industrial Pretreatment Coordinator (IPC)** means an authorized representative of the Control Authority that implements and coordinates the pretreatment program or the IPC's authorized representative .

I. **lb/day** means pounds per day.

J. **mg/l** means milligrams per liter.

K. **NPDES** means National Pollutant Discharge Elimination System and refers to the discharge permit issued to the POTW.

L. **pH** means the acidity or alkalinity of a solution. Neutral is 7.0, acidic is lower, and alkaline is higher.

M. **POTW** means the publicly owned treatment works including the collection system, treatment plant and other appurtenances. It also means the municipality having jurisdiction over

dischargers to the treatment plant.

N. **Slug** means any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or non-customary batch discharge.

O. **TSS** means total suspended solids.

P. **TTO** means total toxic organics.

Q. **Upset** is an unintentional and temporary noncompliance with permitted effluent discharge limitations because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed or inadequate treatment facilities, lack of preventative maintenance, or careless or improper operations.

ATTACHMENT A - SIGNATORY AUTHORIZATION

All reports and information submitted pursuant to the requirements of this discharge permit will be signed and certified by an **authorized signatory** of the Permittee. In accordance CFR Part 403.12(i), an authorized signatory is:

(1) A responsible corporate officer, if the industrial user is a corporation; a responsible corporate officer means (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;

(2) A general partner or proprietor if the industrial user is a partnership or sole proprietorship respectively; or

(3) A duly authorized representative of the individual designated in (1) or (2) of this definition if (i) the authorization is made in writing by the individual described in (1) or (2) of this definition, and (ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company, and (iii) the written authorization is submitted to the Control Authority.

_____ Effective Date	If authorized signatory at left is a (3) above, she/he is authorized by:
_____ Authorized Signatory (Print)	_____ Name (Print)
_____ Authorized Signature	_____ Signature
_____ Title	_____ Title

Authorization Revoked by:

_____ Signature of a Current Authorized Signatory	_____ Date Revoked

Attachment A-3

CITY OF BLYTHEVILLE WASTEWATER DEPT. **INDUSTRIAL USER INSPECTION FORM**

INSPECTORS NAME(S) James Yankee DATE: 6/15/2010 TIME: 11:30 AM

NAME OF FACILITY: MOTOR APPLIANCE CORPORATION

MAILING ADDRESS: 300 Industrial Drive

PHYSICAL ADDRESS: 4872 NCR 779

PHONE NO: 763-3652 OTHER:

CONTACT PERSON: STEVE SMITH Willie Coleman TITLE: PLANT MANAGER

SIC NO: 3421 NAICS NO: 332813 WW PERMIT NO: 10 APPLICATION DATE: 12/1/06

OTHER PERMITS: N/A

DESCRIPTION OF PROCESSES: Manufactures Battery Chargers

FLOWS: 820 ~~[illegible]~~ gpd CONTINUOUS? BATCH? YES

PRODUCTION RATES: N/A

POLLUTION PREVENTION ALTERNATIVES: N/A

BEST MANAGEMENT PRACTICES: N/A Company has been slow

SLUG/SPILL PREVENTION: Does not have the potential for a spill or slug load

HAZARDOUS WASTE: N/A

STORAGE: One 55 gallon drum next to cleaning tanks

TOXIC ORGANIC MANAGEMENT PLAN: N/A

TTO CERTIFICATION? Currently working on certification

DISCHARGE PARAMETERS: Chromium, Copper, Lead, Nickel, Zinc, pH, TSS SVOCs, VOCs

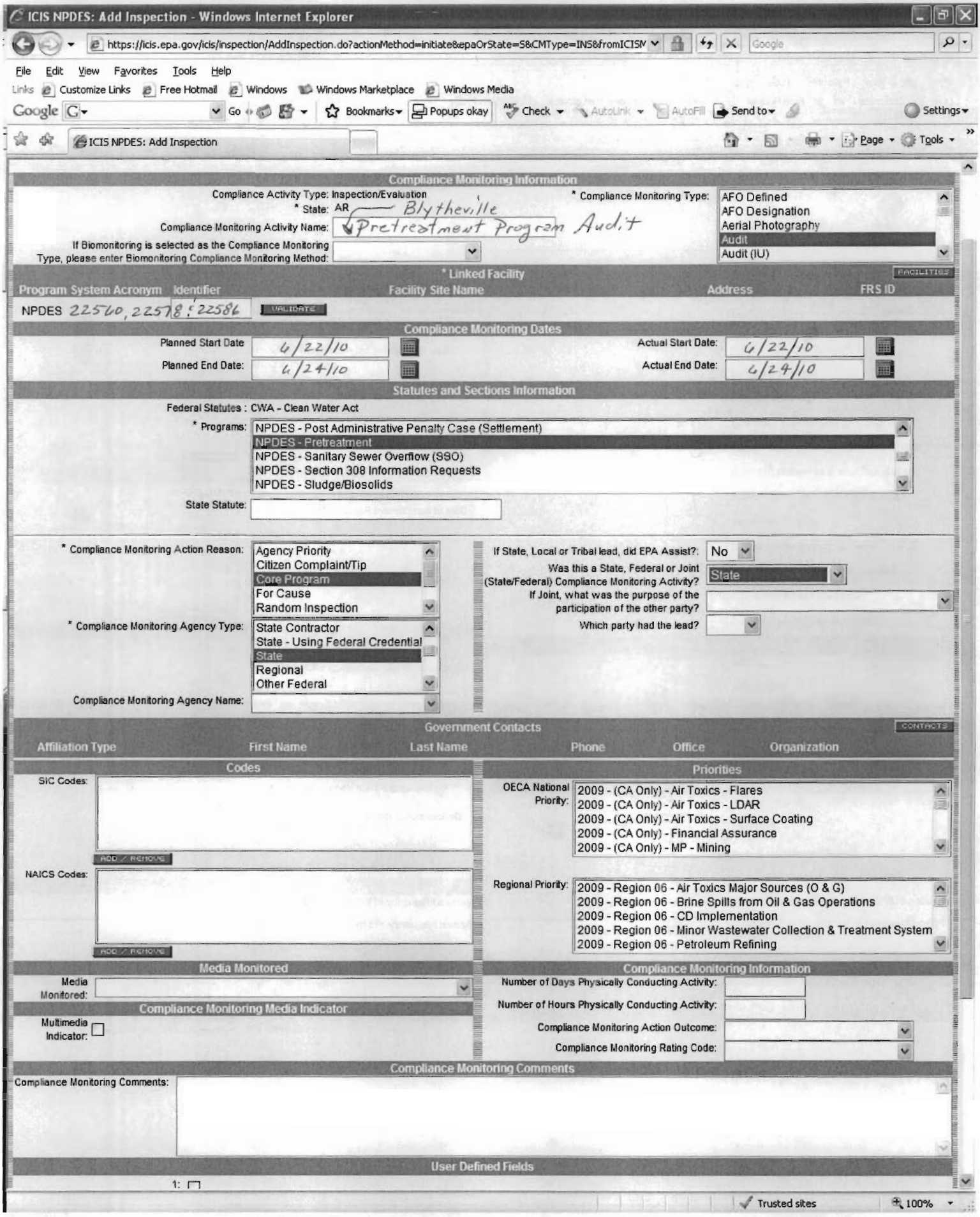
MONITORING FREQUENCY: twice per year (phosphatizer)

SAMPLING POINT: Southside of building at cleanout POTW: North Plant

CHANGES SINCE LAST INSPECTION: None - business slow

REPS. SIGNATURE: Douglas Allen DATE: 6/15/10

INSPECTORS SIGNATURE: James Yankee DATE: 6/15/2010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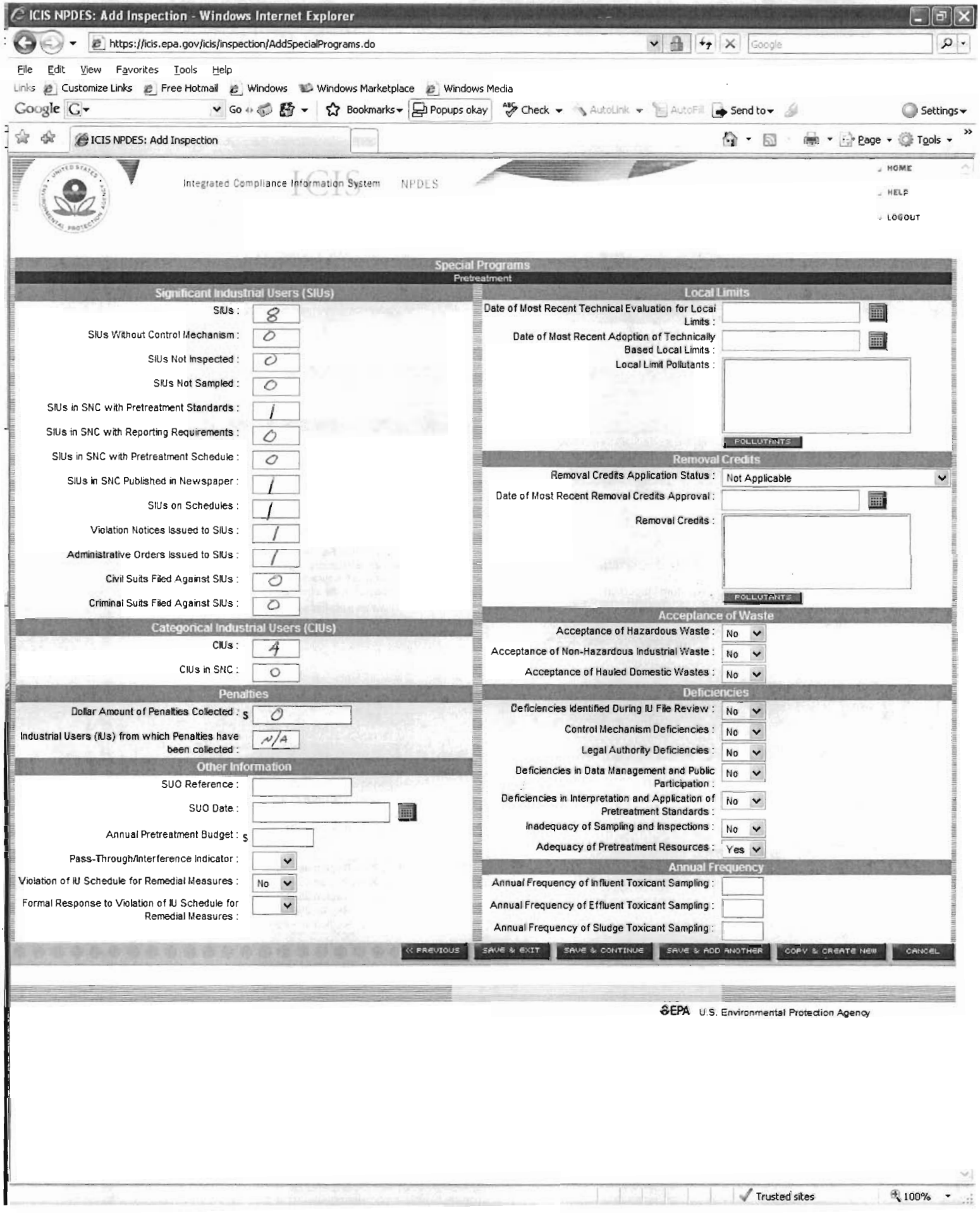
ICIS NPDES: Add Inspection
Compliance Monitoring Information
Compliance Activity Type: Inspection/Evaluation
* State: AR
Compliance Monitoring Activity Name: Blytheville Pretreatment Program Audit
If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method:
* Compliance Monitoring Type: AFO Defined, AFO Designation, Aerial Photography, Audit, Audit (IU)
* Linked Facility
Program System Acronym Identifier Facility Site Name Address FRS ID
NPDES 22560, 22578, 22586
VALIDATE
Compliance Monitoring Dates
Planned Start Date 6/22/10
Planned End Date: 6/24/10
Actual Start Date: 6/22/10
Actual End Date: 6/24/10
Statutes and Sections Information
Federal Statutes : CWA - Clean Water Act
* Programs: NPDES - Post Administrative Penalty Case (Settlement), NPDES - Pretreatment, NPDES - Sanitary Sewer Overflow (SSO), NPDES - Section 308 Information Requests, NPDES - Sludge/Biosolids
State Statute:
* Compliance Monitoring Action Reason: Agency Priority, Citizen Complaint/Tip, Core Program, For Cause, Random Inspection
* Compliance Monitoring Agency Type: State Contractor, State - Using Federal Credential, State, Regional, Other Federal
Compliance Monitoring Agency Name:
If State, Local or Tribal lead, did EPA Assist?: No
Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? State
If Joint, what was the purpose of the participation of the other party?
Which party had the lead?
Government Contacts
Affiliation Type First Name Last Name Phone Office Organization
Codes
SIC Codes:
ADD / REMOVE
NAICS Codes:
ADD / REMOVE
Priorities
OECA National Priority: 2009 - (CA Only) - Air Toxics - Flares, 2009 - (CA Only) - Air Toxics - LDAR, 2009 - (CA Only) - Air Toxics - Surface Coating, 2009 - (CA Only) - Financial Assurance, 2009 - (CA Only) - MP - Mining
Regional Priority: 2009 - Region 06 - Air Toxics Major Sources (O & G), 2009 - Region 06 - Brine Spills from Oil & Gas Operations, 2009 - Region 06 - CD Implementation, 2009 - Region 06 - Minor Wastewater Collection & Treatment System, 2009 - Region 06 - Petroleum Refining
Media Monitored
Media Monitored:
Compliance Monitoring Media Indicator
Multimedia Indicator:
Compliance Monitoring Information
Number of Days Physically Conducting Activity:
Number of Hours Physically Conducting Activity:
Compliance Monitoring Action Outcome:
Compliance Monitoring Rating Code:
Compliance Monitoring Comments
Compliance Monitoring Comments:
User Defined Fields
1:
Trusted sites
100%


ICIS NPDES: Add Inspection - Windows Internet Explorer
https://icis.epa.gov/icis/inspection/AddSpecialPrograms.do
ICIS NPDES: Add Inspection
Integrated Compliance Information System ICIS NPDES
HOME
HELP
LOGOUT
Special Programs
Pretreatment
Significant Industrial Users (SIUs)
SIUs : 8
SIUs Without Control Mechanism : 0
SIUs Not Inspected : 0
SIUs Not Sampled : 0
SIUs in SNC with Pretreatment Standards : 1
SIUs in SNC with Reporting Requirements : 0
SIUs in SNC with Pretreatment Schedule : 0
SIUs in SNC Published in Newspaper : 1
SIUs on Schedules : 1
Violation Notices Issued to SIUs : 1
Administrative Orders Issued to SIUs : 1
Civil Suits Filed Against SIUs : 0
Criminal Suits Filed Against SIUs : 0
Categorical Industrial Users (CIUs)
CIUs : 4
CIUs in SNC : 0
Penalties
Dollar Amount of Penalties Collected : $ 0
Industrial Users (IUs) from which Penalties have been collected : N/A
Other Information
SUO Reference :
SUO Date :
Annual Pretreatment Budget : $
Pass-Through/Interference Indicator :
Violation of IU Schedule for Remedial Measures : No
Formal Response to Violation of IU Schedule for Remedial Measures :
Local Limits
Date of Most Recent Technical Evaluation for Local Limits :
Date of Most Recent Adoption of Technically Based Local Limits :
Local Limit Pollutants :
POLLUTANTS
Removal Credits
Removal Credits Application Status : Not Applicable
Date of Most Recent Removal Credits Approval :
Removal Credits :
POLLUTANTS
Acceptance of Waste
Acceptance of Hazardous Waste : No
Acceptance of Non-Hazardous Industrial Waste : No
Acceptance of Hauled Domestic Wastes : No
Deficiencies
Deficiencies Identified During IU File Review : No
Control Mechanism Deficiencies : No
Legal Authority Deficiencies : No
Deficiencies in Data Management and Public Participation : No
Deficiencies in Interpretation and Application of Pretreatment Standards : No
Inadequacy of Sampling and Inspections : No
Adequacy of Pretreatment Resources : Yes
Annual Frequency
Annual Frequency of Influent Toxicant Sampling :
Annual Frequency of Effluent Toxicant Sampling :
Annual Frequency of Sludge Toxicant Sampling :
« PREVIOUS
SAVE & EXIT
SAVE & CONTINUE
SAVE & ADD ANOTHER
COPY & CREATE NEW
CANCEL
EPA U.S. Environmental Protection Agency
Trusted sites
100%