ADEQ

ARKANSAS
Department of Environmental Quality

NPDES PERMIT FILE
NPDES # AR0022560
AFIN # 47-00145
Permit PN
Correspondence
Technical Backup
6-1-07 Date Scanned
MR

May 30, 2007

Barrett Harrison
Mayor, City of Blytheville
124 W. Walnut
Blytheville, Arkansas 72316

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

Dear Mayor Harrison:

Please find enclosed the finished report for the audit/assessment conducted March 26 though March 28, 2007. 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.

The audit found deficiencies in the implementation of the City's Pretreatment Program which, in aggregate, met the criteria for significant non-compliance (SNC). Specific attention should be given to the Audit Finding #9 (page 7) and Recommendation #7 (page 9). It was also found there were very few pollution prevention (P2) activities on the City's part.

It was a pleasure working with your staff 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
cc: Lee Bohme/EPA 6WQ-PO
Frank Esry/ADEQ Inspector Supervisor
Dennis Benson/NPDES Enforcement
Kenneth Ellis/Superintendent/Blytheville Sewer Commission/P.O. Box 1784/Blytheville, AR 72316

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF BLYTHEVILLE, ARKANSAS

NPDES PERMIT #AR0022560

May 30, 2007

PREPARED BY: ALLEN GILLIAM

NPDES STATE PRETREATMENT COORDINATOR

ADEQ

TABLE OF CONTENTS

LIST OF ATTACHMENTS

A) INTRODUCTION

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

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

An audit/assessment was performed March 26 through March 28, 2007, 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

* 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.

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 11% of its average flow of 0.65 MGD from five (5) significant industrial users (SIUs), three (3) of which are categoricals. The South POTW has no SIU contributions to its average flow of 0.6 MGD. The West POTW has only one (1) non-categorical SIU (an industrial laundry) contributing an estimated 0.6% of its average flow of 0.65 MGD.

The West and South POTWs are required to conduct whole effluent toxicity testing. There has been no pattern of toxicity indicated from these facilities.

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..."

Motor Technologies' (MT) permit limits must be modified to reflect the production based standards for the wastewater being discharged from its aluminum die casting operations regulated under 40 CFR 464.16 subprocess (b) "casting quench operations". Discussions during the facility site visit indicated a separate monitoring location could be set up for compliance assurance for this process instead of going through the rigors of calculating a combined wastestream limit with their metal finishing wastewater.

This is the second occurrence of this deficiency. In the City's response to the 7/02 audit, correspondence dated 11/20/02, item 2.b. did state "[MT] Will have production based limits included in their permit for its aluminum die casting operations. A separate monitoring location will be setup for sampling." This has not been accomplished to date.

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".

2a) The industry inspections were vague and included only basic/vague information (in some cases, none) regarding the various processes, wastestreams' identification, chemicals handling, products and raw material, etc. Both the City and facility representative's signatures should be affixed to the inspection report (see Attachment A-3 for example).

City personnel were given an acceptable form of a comprehensive inspection form during the 7/02 audit. And, during this audit, it was pointed out to the Coordinator if the City's IU inspections asked and answered all questions on the attached Audit Checklist, Section III, part D.9.a. through m. ("Inspections"), they would have conducted and adequate inspection.

This is the second occurrence of this deficiency. In the City's response to the 7/02 audit, correspondence dated 11/20/02, item 3.b. did state, "[IU] inspections will be 'beefed up' to include.....". This has not been accomplished to date.

2b) The monitoring site at Motor Appliance must be moved to sample only their regulated wastewater. The City was sampling at a man hole which also included dilution streams and must be moved to sample only the IU's regulated wastestream.

*3) **Ordinance #1594, Section 5.7 states, "A user with an expiring...permit shall apply...for reissuance by submitting a complete permit application...a minimum of sixty (60) days prior to expiration...of discharge permit...". The City's IUs' permits also require this in Part III, Section A, paragraph 9*** (although it has a conflicting reissuance period of "ninety (90) days". See Attachment A-8m for example).

Either enforce the re-application requirement (and correct the reissuance time periods) for a new permit or remove the language from existing permits and the City's Pretreatment Ordinance.

This is the second occurrence of this deficiency. In the City's response to the 7/02 audit, correspondence dated 11/20/02, item 8 did state, "Existing permitted facilities will be required to re-apply for a new permit. This language will be enforced and notification of the expiring permit will be sent to the IU at least 90 days prior to expiration." This has not been accomplished to date.

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...". The IUs' permits (see Attachment A-8h for example) also include this flow measurement requirement.

Since the City is doing the monitoring in lieu of the IUs, a system must be developed to record these flows to include with the "City-in-lieu of" IU reports.

This is the second occurrence of this deficiency. In the City's response to the 7/02 audit, correspondence dated 11/20/02, item 4 did state, "Periodic reports on continued compliance will include flow measurements...". Not all IU reports had flow measurements included.

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"

This is the second occurrence of this deficiency. The 7/02 audit recommended this required procedure be conducted but it was not evident a comprehensive industry/non-domestic survey user had been conducted and a list could not be produced.

6a) Under ***403.8(f)(1)(ii)*** "[The City will] Require compliance with applicable Pretreatment Standards and Requirements by [IUs]...". ***IU permits' Part I, Section D.1. requires a "pollution prevention [P2] assessment and submittal..." and Part IV, Section C. requires an "Accidental Spill/Slug Prevention Plan (ASPP) shall be developed and submitted for approval"*** (see Attachment A-8e and A-8r for example of requirements).

Neither the assessments nor all slug control plans (ASPPs) could be produced. The City should either remove the P2 assessments or enforce this requirement. The slug control plans (if necessary) must be submitted AND approved in writing by the City.

As a side note: During the site visit at Motor Appliance, it was of this auditor's opinion that a slug potential did not exist.

6b) Under ***403.8(f)(2)(vi)*** "Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006.

It was not evident from the file review (inspection forms) nor during the industry site visits this requirement was fulfilled. While the City does require ASPPs (above), the few submitted (see Attachment A-7 for example) did not appear to have any return correspondence from the City they were "approved" and it was not obvious in this auditor's opinion that a proper evaluation had been conducted at the facilities visited. The only question asked during the City's inspection (see Attachment A-3) was, "Slug Potential?_____".

7) Under ***40 CFR 403.12(p)(1)*** "The IU shall notify the POTW...in writing of any discharge into the

POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR 261."

And, under ***40 CFR 403.8(f)(2)(iii)*** "The POTW shall...notify IUs of applicable pretreatment standards and any applicable requirements under [the hazardous waste regulations in the RCRA]".

Documentation of the initial notification requirement in CFR 403.8(f)(2) could not be produced. A notification statement must be made to the City's hazardous waste generators (ADEQ's list for the City was provided during audit). Focus should also be directed at the hospitals, dentists, chiropractors, other health related clinics and long term care homes. Recent P2 workshops indicate that many, if not most of these facilities do not realize they are generators and are discharging quantifiable amounts of silver and mercury into the POTW.

No documentation this had been accomplished could be produced.

This is the second occurrence of this deficiency. In the City's response to the 7/02 audit, correspondence dated 11/20/02, item 7 did state, "A new notification and computerized data base will be implemented for hazardous waste generators".

The City must also notify their permitted industries of the most recent revisions to the National Pretreatment Regulation in CFR 403.

8) 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. Most 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. Even during the site visit, there was some confusion on what was being sampled for compliance with CFR 433.

Since SRT bought out Sumitec who conducted nickel plating, discussions during the site visit indicated the Ni plating wastewater was sampled separately (on a batch discharge basis?) from the rest of SRT's wastewaters which should now be considered regulated as ancillary streams under CRR 433. This situation must be clarified in a clear, comprehensive schematic.

9) Under ***403.8(f)(3)*** "[The City] shall have sufficient resources and qualified personnel to carry out the authorities and procedures [to adequately implement a Pretreatment Program]".

In this auditor's opinion, based on:
1) the above (mainly administrative in nature) repeat deficiencies and others;
2a) the City Pretreatment Coordinator's daily routine of supervising the operation and maintenance of three (3) wastewater treatment plants;
2b) assisting with lab work;
2c) daily supervision of five (5) employees;
2d) fielding numerous phone calls (observed in this audit's 2 & ½ day period);
3) the City Coordinator not having any back-up or Pretreatment cross-trained help and
4) the City's Coordinator not having any clerical/secretarial assistance,
the City is in violation of not supplying sufficient resources for adequate implementation of its own Pretreatment Program.

The City must not only endorse by resolution (see Attachment A-9 signed by the Mayor) the implementation of its Pretreatment Program, it must provide adequate personnel and funding.

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.

Include in 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 date**, 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.

An example case in point: Nibco's permit (see Attachment A-2) had the metal finishing (CFR 433) parameters and others such as beryllium, 1,1,1-Trichloroethance, etc. with no explanation why they were included. A fact sheet should have an explanation why these parameters were chosen.

2) Referring to Requirements #3 and # 5 above (IU Applications and Survey): Recommend sorting by NAICS code, pollutants of concern, location, etc. Include P2, Best Management Practices (BMP), water and energy consumption reduction questions. The listing will also help facilitate identifying and locating new significant industrial users as well as those business/industry groups with Pollution Prevention (P2) opportunities.

3) Recommend establishing a Standard Operating Procedures 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 re-educating Motor Appliance (MA) and Steel Related Technologies (SRT) regarding the toxic organic management plan (TOMP) in lieu of the expensive monitoring for the toxic organics per 433.12. Motor Technologies is submitting their TOMPs on a monthly basis (see Attachment A-4) on a monthly basis with the correct certification statement while the personnel at MA and SRT didn't seem to understand the allowance during their site visits.

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.

7) **Strongly** recommend developing and implementing a grease trap program city-wide. The City reported thirty three (33) sanitary sewer overflows (SSOs) because of grease blockages during '06. The City must realize there is monetary gain in implementing such a program. There are many of these programs established across the state which could provide the City with examples of their programs and how successful they have been.

8) Regarding required action #9 above (inadequate resources), 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

1) Begin modifying the City Pretreatment Program (including its Ordinance) to be current with the new "streamlined" version of CFR 403 (promulgated 10/05).

2) Make revisions to the City's Program in response to this audit's requirements/recommendations.

* * * * * * * *

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of 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: 3/26 -28/07 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

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

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	5/06	"Inspections could be more detailed"
PCI	5/05	No problems indicated
PCI	4/03	No problems indicated

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	11/1/02	10/31/07
AR0022586	North	10/1/01	9/30/06

* 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)- 0.65 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 1 # of CIUs : 0
Industrial Flow (mgd): 0.004 Industrial Flow (%) : 0.6 %

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?) _____

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4		
Priority **	1	1		
Biomonitoring		4		
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)- 0.6 MGD

Sewer System: 100 % Separate; _____ % Combined; 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, *Cu, *Pb (*report only) & WET 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?) _____

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4		
Priority **	1	1		
Biomonitoring		4		
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	: 5	# of CIUs	: 3
Industrial Flow (mgd):	0.07	Industrial Flow (%)	: 11 %

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.

1. Modifications: (non-substantial)

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
4/12/05	Ordinance #1594 (2/15/05) revised; program procedures modified; an ERP included and an evaluation of their MAHLs demonstrating that local limits weren't necessary but, they'd "keep an eye on Cu"	4/12/05

2. Modifications in Progress:

Date Requested	Nature of Modification
n/a	

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: 2/15/05
Date of most recent Pretreatment Program modification approval: 4/12/05

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

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

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

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

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	n/a			
2.				

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

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

Briefly describe other problems: _____

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

___ ✓ 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. The size of the city does not dictate a very comprehensive survey procedure. It will still be required the city conduct and document another comprehensive IU survey per requirements in CFR 403.

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?

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

a. 6 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 4 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 2 Noncategorical SIUs
d. 4 Other regulated nonsignificant IUs (Describe) Septage haulers

10 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:
not the Streamlined version

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?

? Date Notified ? Method of Notification

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

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

YES NO

___ ✓* Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit, or Annual Report?
*(*Audit will require submittal of Program mods to be current with 403)*

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

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

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
✓		If requested?
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	ICAP	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)] **City has not submitted mods to be current with CFR 403*

✓ ___ 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

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

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

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

YES NO

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

Has the Control Authority experienced any of the following:

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

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: *(inspections and files need some work)*

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

Are the following files computerized:

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

Can IU monitoring data can be retrieved by:

___	✓	Industry name
___	✓	Pollutant type
___	✓	Industrial category or type
___	✓	SIC Code
✓	___	IU discharge volume *(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 (Apparent problems with lack of administrative help and not having anyone cross-trained)

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:
Appears City's Pret. Coordinator is not getting enough clerical/admin. support to handle the day-to-day pretreatment paperwork & organization

		Percent of Total Funding
✓	POTW general operating fund	100
✓	IU permit fees*	*these go back into general fund
	monitoring charges	
	industry surcharges	
	other (describe) _____	
	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:
Sewer rates were increased just last January. "What impact it might have on the pretreatment program is unknown".

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

YES	NO		If no, explain
✓		Legal assistance	
✓		Permitting	
✓ & ✓		IU inspections	Inadequate inspections
✓		Sample collection	
✓		Sample analyses	
✓		Data analysis, review and response	
✓		Enforcement	
✓ & ✓		Administration (inc. record keeping /data management)	Not all info asked for during file review could quickly be found or located

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

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) 1,270 batch/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) Ave. Process Flow (gpd) 7,500

Industry visited during audit: YES

Comments: should have an internal outfall for the CFR 464 quench wastewater

FILE #: 3 Industry Name Steel Related Tech. File/ID No. 13
Industry Address 101 Terra Road
Industry Description Machining/Maintenance on steel mill equipment & Ni plating
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 7692
Ave. Total Flow (gpd) 6,110 Ave. Process Flow (gpd) 5,760

Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name Advance File/ID No. 5
Industry Address 1000 N. Broadway
Industry Description Industrial Laundry
Industrial Category n/a 40 CFR n/a SIC Code: 7211
Ave. Total Flow (gpd) Ave. Process Flow (gpd) 10,600

Industry visited during audit: NO

Comments: Facility still does not do inkers nor solvent laden linens

FILE #: 5 Industry Name Nibco File/ID No. 7
Industry Address 4059 Hwy 18 East
Industry Description Iron foundry manufacturing gate and butterfly valves
Industrial Category N/A 40 CFR N/A SIC Code: 3321/3494
Ave. Total Flow (gpd) 8,000 Ave. Process Flow (gpd) 0

Industry visited during audit: YES

Comments: No contact cooling water

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism

1. Does the file contain an application for a control mechanism?	1	1	2	1	1
If yes, what is the application date?	BMR 9/98	BMR 9/01	BMR 6/04	BMR 10/91	BMR 11/01
Does it ask for Pollution Prevention information?	no	no	no	no	no
2. Does the file contain a Permit?	✓	✓	✓	✓	✓
Permit Expiration Date?	12/11	12/11	12/08	12/11	6/10
Is a fact sheet included?	no	no	no	no	no
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?	3	4	✓	✓	5
e. Appropriate self-monitoring requirements?	6	6	6	6	6
f. Sampling frequency?	7	7	7	7	7

Comments: 1. IU permits require re-app. 90 days prior to expiration. They're not doing this and city's not enforcing this provision; 2) SRT bought out Sumitec (Ni plater) in 6/04. City used their BMR as the permit app. SRT's prior ops just included steam cleaning but is now considered a new source 433. WW sampled is now a combination with no dilution; 3) City is sampling at MH which includes SS and non-contact cooling water (dilution). They didn't use the CWF in calculating permit limits; 4) IU has an Al die casting operation with (quench) wastewater and should have a separate internal outfall for this small quantity discharged to ensure compliance with CFR 464; 5) Metal finish limits (see Attach. A-2); 6) City does all monitoring for their IU's; 7) 2/yr for continuous dischargers. Batch dischargers have to notify the City when "ready".

SECTION III: INDUSTRIAL USER FILE REVIEW

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

C. Application of Standards

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

Comments: 1. Permits require flow monitoring. None could be found; 2) Ni plating bath is sampled directly from "treatment tank" which is batch discharged. SRT's pre-clean WW is continuously flowing & and is sampled at MH without any dilution; 3) Metal finishing standards for this non-categorical iron foundry? See Attch. A-2.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	no	n/a	n/a	n/a	n/a
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	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?	no	no	no	no	no
e. Sample preservation procedures?	1	1	1	1	1
f. Chain-of-custody records?	✓	✓	✓	✓	✓
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	✓

Comments: 1. "Contract lab sends bottles with proper preservatives in them"

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	1	2	1	n/a	n/a
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	no	no	no	no	n/a
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	✓
Inspections *(See Attachment 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	9/06	5/06	10/06	5/06	3/06
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	3	3	3	3	3
b. Inspection date and time?	✓	✓	✓	✓	✓
c. Name and title of IU official contacted?	3	3	3	3	3
d. Verification of production rates?	n/a	no	n/a	n/a	n/a
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	4	4	4	4	4
f. Evaluation of pretreatment facilities?	n/a	n/a	✓	✓	n/a
g. Evaluation of self-monitoring equipment and techniques?	5	5	5	5	5
h. ~~(Re)~~-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	6	6	6	6	6
i. Manufacturing facilities?	4	4	4	4	4

Comments: 1) No TOMPs submitted. City's doing 2/yr TTO scans; 2) See Attach. A-4 for this IU's TOMP; 3) Recommend including City's AND IU rep's signature; 4) Needs to be much more comprehensive; 5) City does all monitoring; 6) Permits require one to be submitted. No "slug control plans" (specifically) could be located but see Attach. A-7 for example of a fairly comprehensive spill control plan.

SECTION III: INDUSTRIAL USER FILE REVIEW

		FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
j.	Chemical handling and storage procedures?	no	no	no	no	no
k.	Chemical spill prevention areas?	no	no	no	no	no
l.	Hazardous waste storage areas and handling procedures?	n/a	1	1	n/a	n/a
m.	Sampling procedures?	n/a	n/a	n/a	n/a	n/a
n.	Laboratory procedures?	2	2	2	2	2
o.	Monitoring records?	n/a	n/a	n/a	n/a	n/a
p.	Evaluation of Pollution Prevention opportunities?	no	no	no	no	no
q.	Control Authority inspector signature?	no	no	no	no	no
IU Self-Monitoring and Reporting						
10.	Does the file contain self-monitoring reports?	3	3	3	3	3
11.	Does the file include:		6			
a.	BMR?	1/92	9/01	6/04	n/a	n/a
b.	90-Day Report?	✓	✓	✓	n/a	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	n/a
12.	Did the IU report on all required parameters?	n/a	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	n/a
14.	Did the IU report flow?	4	4	4	4	4
15.	Did the IU comply with the required reporting frequency(s)?	n/a	5	n/a	n/a	n/a

Comments: 1) Just a question regarding "Haz waste generator?"; 2) ADEQ certified labs; 3) City does all the monitoring; 4) City does monitoring for IUs but no flows were reported; 5) See Attachment A-4 for this facility's TOMP "report"; 6) See Attach. A-5 for IU's BMR

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
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	n/a
18. Has the IU developed a Slug Control and Prevention Plan?	no	no	no	no	no
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	no
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	n/a
b. Did POTW respond to the spill?	n/a	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	n/a
b. IU self-monitoring results?	n/a	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
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	0	0	0
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	n/a	n/a	n/a	n/a	n/a

SECTION III: INDUSTRIAL USER FILE REVIEW

Enforcement (continued)

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

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Blytheville NPDES #: AR0022560

Date of Audit: 3/26 - 3/28/07 Date entered into QNCR: 5/31/07

(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

YES 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: 3/27/07; 9:10 a.m.

Contacts: Steve Smith/General Manager; "Billy"/Supv; "Doug"/Lead Man for painting

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

Additional comments:

Facility manufactures the Al or steel (~50/50) enclosures and assembles assorted sizes of battery chargers. Most of the operations include some 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: 3/27/07

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:

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 (~840 gallons?) 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.

It was discovered thru the file review that the city was taking samples from a manhole in front of the facility which included sanitary wastes (dilution) and discussed with IU rep. Permit limits are straight out of CFR 433 and a correction has to be made.

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. No floor drains.

After viewing the plumbing coming out of the rear of the building (opposite the wall next to the phosphatizing ops) it was discovered that a direct line from that operation could be tapped into for a direct sample to be taken for compliance with CFR 433 limits. That was discussed as "the plan".

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 and 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.

Visit conducted by: Gilliam/Yankee Date: 3/27/07

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: 3/27/07; 10:32 a.m.

Manufacturer of electric motors Contacts: Phyllis Towery/MIS-Safety Director; Steve Elliot/Plant Manager; Pete Gomez/Maintenance

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

Additional comments:
Facility manufacturers the rotors/cores for medium to large sized electric motors (40 to 450 hp). Approximately 30 to 40 units/day are made. IU has not changed operations substantially since the audit conducted about 5 years ago.
Process begins with numerous wafer thin rotor laminations (steel) being injected with semi-molten aluminum. This process does not appear to "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.
However, 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 rate almost negligible (production down from ~40 motors/day to ~17 [and not every day]) to sample.

Visit conducted by: Gilliam/Yankee Date: 3/27/07

(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: This appears to be covered under subprocess (b) of CFR 464.16. Again, similar to what transpired approx. 5 years ago, discussions ensued that this wastewater could be hauled off or a separate sampling of the overflow at the quench tank for compliance could be conducted. The City has not permitted this IU for that federally regulated process nor has there been any sampling for compliance as required in the previous audit.

The cores are further air cooled and heat treated prior to the shaft "pressing process" (hand held brass sledge hammer) and once again sent through a 300 gallon quench tank. Rotors assemblies are then sent through a typical 5 stage phosphatizing operation (they call the "GAT line"): 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.

Conversation ensued with Pete that a chain link fence (with a locking gate) could be constructed around the bottoms of these tanks with only one designated person with a key could enter the tanks' bottom area.

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. Phyllis did indicate there was a "work procedure document" for instructions when to dump.

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"?).

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

Visit conducted by: Gilliam/Yankee Date: 3/27/07

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 Plating) Date/Time of visit: 3/27/07 / 1:05 p.m.
Machinery/equip. repair/cleaning for local steel mills and now Ni plating ops
Industry contacts: Tommy Gilbert/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: Since last audit Steel Related Tech. (SRT) bought out Sumitec which was located in the same building but with a separate outfall. Sumitec conducted Ni plating on selected parts that SRT cleaned for the iron and steel mills in the area. Now, the previously un-regulated cleaning waters (from SRT alone) are considered ancillary ops. under CFR 433. Facility cleans heavy steel industry "molds" (huge bearing systems) 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. Preliminary discussions revolved around the schematics pulled from the city's files. It was apparent existing drawings were not up to date nor correct and the IU will have to provide the city with the most current and accurate drawings.

Visit conducted by: Gilliam/Yankee Date: 3/27/07

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: [nomenclature and description may not be 100% accurate] The addition of the Ni plating ops appeared to be 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. 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 chemically precipitated 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. The filter press w.w. is routed back to the treatment system. The plating line is in a pit for secondary containment and is "lined" (coated). Current sampling for this plating line is at the final holding tank (800 to 1000 gallons batch discharged/month). Very small chance for a slug load.

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.

Still some confusion on what/where the city is sampling: Ni plating separately from the cleaning ops? Sanitary and non-contact cooling waters didn't seem to be in the "mix" so the combined wastewater formula should not have to be used.

The only concern this auditor might have is if their Ni (only) samples exceeded limits, they would not have been given "credit" for the other ancillary streams which are sampled separately. The sampling points and exact routing of regulated streams have to be re-confirmed by the City with the IU's input in the form of updated schematics. This was all discussed during the site visit.

Visit conducted by: Gilliam/Yankee Date: 3/27/07

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:
NIBCO Inc. Blytheville Div.; 4059 Hwy. 18 E.; 870.763.7044
Type of industry: Iron Foundry Date/Time of visit: 3/28/07 / 8:25 a.m.
Processes don't "fit" 40 CFR 420 (Iron & Steel category)
Industry contacts: Freddy Gentry/ Env. Control Specialist

		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 produces cast iron butterfly, gate and check valves. Raw material includes scrap steel and "pig" iron. All raw material is first pre-heated to ensure there is no moisture prior to being placed into the induction furnaces.

Molds for these valves are made of "green" sand configured on-site to meet customer specs. The sand is shaped into the mold forms and "solidified" with a chemical binding agent. After a single pour, the used molds are broken up on-site and is sent off-site to a landfill as a non-haz waste. Valves are shaken and blown clean of loose sand prior to further assembly.

Visit conducted by: Gilliam/Yankee Date: 3/28/07

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: NIBCO, Blytheville Division

Additional comments:

Facility's operations do not seem to fall under any subpart in the Iron and Steel Manufacturing Category in CFR 420 except for possibly subpart D, CFR 425.45(c) "electric arc furnace - wet". IU reps indicated the phosphoric and sulphuric acids are used only for clean up of the interior of the furnaces and once spent, the fluids are neutralized and hauled off-site for proper disposal. City appears to have this industry properly categorized. No other water comes into contact with the valves being manufactured. And, nothing but sanitary is sent to the City's collection system.

Some powder coating ops are performed but with no pre-clean wastewater associated. And, rubber coating is applied to the interior of the butterfly valves with no wastewater associated.

Huge furnace/core building was visited where there were no floor drains visible. Finished valves are either (cast iron) ASTM 8126 and (ductile) ASTM 8395 with another alloy, magnesium added.

They've had some hits on Cu before and it was explained that brass parts are brought in for further machining, etc and its dust was probably that minute source of Cu. Any shavings or particles of machined brass parts is shipped off-site for recycle.

Non-contact cooling water is recirculated once and sent to the city with no chems added.

~1/4 M tons steel poured/day with no wastewater generating operations visible.

Oily contact cooling water is used in machine shop and is drained into drums. When the volume reaches about 5000 gallons, they ship it off for disposal. Some used oil drums were observed being stored outside. Other chemical storage area is in a small storage shed separate from the main buildings.

Adequate sampling site although permit parameters are questionable (CFR 433 metals as well as some others - see Attach. A-2).

Visit conducted by: Gilliam/Yankee Date: 3/28/07

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

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

Permit No:

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: _____

_____

_____

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 _____ day of _____, _____

To expire the _____ day of _____, _____

_____

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.

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.

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

A-1c

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

SEPTIC TANK WASTE ONLY
NO GREASE TRAPS OR INDUSTRIAL WASTE ACCEPTED

Name of Owner: _____ Phone No: _____

Name of Business: _____

Address (street, city, state, zip) _____

_____

Vehicle(s)	License #	Model	Year	Color	Cap./Gals.
1					
2					
3					
4					
5					

Please submit copies of the following documents:

1 Department of Health Inspection for License

2 Proof of Liability Insurance

This application must be complete before a license will be considered.

Mail or Fax this application to: Blytheville Wastewater Department
PO Box 1784
Blytheville, Arkansas 72316

Phone # (870) 763-4961
Fax # (870) 763-8541

A-1d

Attachment A-2

(Nibco's permit limit page)

NibcoPermit7

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to discharge 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)		
Copper, total	3.38				2-times/annually	24-hr composite
Zinc, total	2.61				2-times/annually	24-hr composite
Oil & Grease	100				2-times/annually	Grab
Beryllium	5.0				2-times/annually	24-hr composite
Phenols	1.0				2-times/annually	24-hr composite
1,1,1-Trichloroethane	Report				2-times/annually	24-hr composite
Methylene Chloride	Report				2-times/annually	24-hr composite
Chloroform	Report				2-times/annually	24-hr composite
Cadmium	0.69				2-times/annually	24-hr composite
Chromium	2.77				2-times/annually	24-hr composite
Lead	0.69				2-times/annually	24-hr composite
Nickel	3.98				2-times/annually	24-hr composite
Mercury	0.05				2-times/annually	24-hr composite
Cyanide, total[3]	1.20				2-times/annually	Grab
T.S.S. & BOD5	300				2-times/annually	24-hr composite
p.H.	6.0 s.u. minimum		9.0 s.u. maximum		2-times/annually	Grab
Silver	0.43				2-times/annually	24-hr composite
Phenols	1.0				2-times/annually	Grab

[1] The Control Authority will ensure test detection levels are sufficiently low to demonstrate compliance with permit limitations. If an analytical result is below the laboratory detection limit, then the detection limit shall be used in the calculation of pounds unless permitted otherwise by the Control Authority. The EPA recommends the following detection limits (mg/l): 0.001 cadmium, 0.01 chromium, 0.01 copper, 0.005 lead, 0.0002 mercury, 0.04 nickel, 0.002 silver, 0.02 zinc, 0.01 cyanide.

Attachment A-3

BLYTHEVILLE WASTEWATER DEPARTMENT **INDUSTRIAL INSPECTIONS**

INSPECTORS NAME James Yankee DATE 7/19/06 TIME 10:00am

I.U. NAME Motor Appliance Corp

SITE ADDRESS 1872 NCR 779

I.U. REPRESENTATIVE Doug Atkins / Steve Smith

TELEPHONE # 763-3652

DESCRIPTION OF MANUFACTURING PROCESS: battery chargers - circuit boards

SOURCES OF PROCESS WASTEWATER: paint booth / cleaning tanks

CATAGORICAL I.U. ? Yes

CHEMICAL STORAGE INFO: in barrels

HAZARDOUS WASTE GENERATOR? No

HAZARDOUS WASTE I.D. # N/A

OTHER HAZARDOUS WASTE ACTIVITY None.

SPILL PREVENTION & SOLVENT MANAGEMENT PROCEDURES: N/A

SLUG POTENTIAL? Yes

PRETREATMENT FACILITY? No

TYPE/DESCRIPTION N/A

I.U. SAMPLING PROCEDURES: Permit #10 - TTO's

SAMPLING LOCATION: Manhole #10

Attachment A-4

Motor Technologies

December 28, 2006

Blytheville Sewer Commission
Mr. James Yankee
P.O. 1784
Blytheville, AR
72316-1784

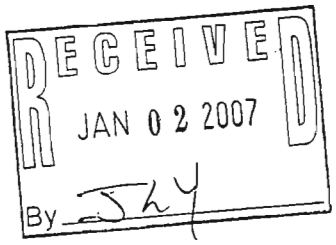
Dear Mr. Yankee,

Please find enclosed our TTO plan for Marathon Electric - Motor Technologies Group of Blytheville, AR. If you have any questions please do not hesitate to call Phyllis Towery or Steve Elliott at (870) 776-1297.

Sincerely,

Phyllis Towery

Phyllis Towery
Safety Compliance
Marathon Electric - Motor Technologies Group



4025 E. HWY 18
BLYTHEVILLE, AR
72315

Marathon Electric Corporation - Motor Technology Group

I. Process Engineering Analysis

A. Process Description

Marathon Electric manufactures electric motors. Processes include aluminum die casting, machining, winding of copper magnet wire into stator, varnish treatment of stator, steel fabrication / welding, painting, assembly, and packaging.

The primary sources of process wastewater are the quenching tanks at the hot drop oven and in die cast, the die cast hydraulics and the die cast vacuum pumps. The quench tank at the hot drop oven discharges 1500 gallons of water per day which is used to cool aluminum die cast and steel rotors/shafts. The quench tank at die cast also discharges 1500 gallons of water per day and is used to cool aluminum die cast and steel rotors. The die cast hydraulics and vacuum pumps each discharge 1000 gallons of non-contact cooling water per day. All of the previous process discharges water on a continual basis throughout the day. Another waste stream is the GAT wash system. The GAT system has two tanks that are 1800 gallons each. On roughly a quarterly basis, these tanks are treated and discharged into the wastewater conveyance.

B. Identification of Toxic Organic Chemicals Entering the Plant Wastewaters

1. Identification of Solvents Used in Manufacturing Operations

a. Vinyl Toluene is a cleaning solvent used in the encapsulation process. The average quantity of Vinyl Toluene used is 200 gallons per year. Vinyl Toluene is a pure chemical that has no other ingredients and is purchased from the P. D. George Corporation. A Material Safety Data Sheet has been provided and is on file.

b. Isopropyl Alcohol 99% is a cleaning solvent used in wiping down motors to remove excess paint. The average quantity of Isopropyl Alcohol 99% used is 95 gallons per year. Isopropyl Alcohol 99% is a pure chemical we purchase from Advanced Chemicals. A Material Safety Data Sheet has been provided and is on file.

c. 8183 SW Polyester Resin is a varnish that is used to form, protect, and create a water tight seal around the copper in our electric motors. The average quantity of 8183 SW Polyester Resin used is 3430 gallons per year. We purchase 8183 SW Polyester Resin from the P. D. George Corporation. The primary hazardous ingredient of 8183 SW Polyester Resin is vinyl toluene. A Material Safety Data Sheet has been provided and is on file.

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

There are no other possible sources of toxic organics that can be introduced into the wastewater stream. All floor drains are sealed off and any spills will be enclosed with spill socks and disposed of properly.

II. Pollution Control Evaluation

A. Solvent Substitution

Marathon Electric - Motor Technologies Group has explored the feasibility of substituting another product that does not contain toxic organic or hazardous materials. Obviously, this would be the most effective manner of eliminating toxic organic discharges both from process operations and from potential spillage's. Marathon Electric - Motor Technologies Group concluded after these tests that the alternative products could not be used without adversely affecting the process and final products. The alternative products were not nearly as effective as the ones currently used and, therefore, would impair the effectiveness of subsequent operations.

B. Process Modifications

Marathon Electric - Motor Technologies Group has explored the feasibility of process modifications. Motor Technologies Group concluded after these tests that there could not be any feasible process changes. Again though there are no toxic organics being disposed of into the wastewater stream.

C. Sealing Floor Drains

All floor drains, except the ones approved for dumping, are sealed. Therefore the possibility of a spill of toxic organics into the wastewater stream has been eliminated.

III. Toxic Organic Management Plan

As a result of the above analyses, Marathon Electric - Motor Technologies Group believes that all of its toxic organic pollutant discharges can be controlled by a toxic organic management plan in lieu of routine toxic organic monitoring.

A. Solvent Substitution

Marathon Electric - Motor Technologies Group was unable to find suitable substitutions.

B. Process Changes

Marathon Electric - Motor Technologies Group was unable to find any feasible process changes.

C. Toxic Organic Chemical Inventory

Material	Toxic Organic Chemicals	Quantity(gallons/year)
Vinyl Toluene	Vinyl Toluene	200
Isopropyl Alcohol 99%	Isopropyl Alcohol	95
8183 SW Polyester Resin	Vinyl Toluene	3420

D. Solvent Storage Procedures

All solvents and paints containing toxic organic compounds are stored in centralized areas. There are no floor drains in the storage areas.

E. Spent Solvent Disposal Practices

Spent solvent and other hazardous materials are collected in 55 gallon drums, sealed, and stored in an existing, secured storage area. The storage area contains no floor drains. Marathon Electric - Motor Technologies Group sends spent solvent and other hazardous materials to Crystal Clean. Manifests and other records pertaining to spent solvent disposal and reclamation are kept at the plant site as meeting state and federal requirements.

F. Training

All personnel involved in the proper handling of solvents and chemicals pertaining to Marathon Electric activities has received instruction in the proper handling and disposal of solvents and clean-up materials in order to keep regulated toxic organics out of industrial wastewater. New employees will be trained in these procedures immediately. All personnel working in these activities are familiar with this toxic organic management plan and will follow the procedure established in the plan to eliminate regulated organics from entering the wastewater system. The basic elements of this program are posted in a conspicuous location at the work area.

G. Inspections

1. Spray booths, and cleaning operations will be inspected routinely by the area supervisor to verify cleaning procedures and adherence to this TOMP to insure that TTO does not spill or leak into plant sewers.

2. Centrally located cleaning and solvent handling, reuse, and collection areas, as well as raw material and waste solvent storage areas, will be inspected routinely by a designated environmental representative to verify proper solvent storage, handling, and collection.

H. Implementation

All provisions of this plan were fully implemented on May 30, 2003.

IV. Certification

TTO Certification Statement

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for Total Toxic Organics, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing the last discharge monitoring report (Self-Monitoring Report). I further certify that this facility is implementing the Toxic Organic Management Plan submitted to the control authority (Districts) Dec 28, 2006.

Steve Elliott

Steve Elliott
Plant Manager

Attachment A-5

INDUSTRIAL BASELINE MONITORING REPORT

Instructions: Please complete this form in as much detail as possible. Include additional information on attached sheets as necessary. Refer to the supplemental instructions and return this report to the address shown in the instructions.

(1) Identifying Information:

A. Legal Name: REGAL BELOIT CORPORATION - MOTOR TECHNOLOGIES GROUP
Mailing Address: 4025 E. ARKANSAS HIGHWAY 18
BLYTHEVILLE, AR
Zip: 72315

B. Facility Name: SAME AS ABOVE
Location:
Zip:

C. Name of Owners: REGAL BELOIT CORPORATION

D. Name of Operators: REGAL BELOIT CORPORATION - MOTOR TECHNOLOGIES GROUP

E. Facility Contact (provide the name, title & phone number of a designated person to contact if additional information is necessary.) JIM PRINCE, ENGINEERING MANAGER
870-776-1297 EXT 251

F. Number of Employees 90 G. Number of Shifts 1

H. Number of Months/Year in Operation 8 MONTHS

I. Provide the name of the publicly owned treatment works (sewerage authority, municipality, etc.) that receives the wastewater discharges from this facility (if this facility is not connected to a sewerage system describe where wastewater is discharged.) CITY OF BLYTHEVILLE, ARKANSAS

J. Provide the date the facility began/will begin discharging to the publicly owned treatment works (sewerage authority, municipality, etc.) 12/01/2000
Date facility began operation 2/01/2001

(2) Permits:
Describe all environmental control permits held by or for the facility

Describe Title of the Permit	Permit No.	Issuing Office	Exp. Date
AIR PERMIT APPLICATION	1979 -A	ADEQ	
(UNDER REVIEW BY ADEQ)			

ATTACHMENT A

Process Description

Stator laminations are received, then stacked and welded into a stator core. Magnet wire is wound in coils in the core, connected to lead cable, tested and dipped in varnish. Then baked.

Rotor laminations are received, stacked, die cast with aluminum, quenched, heated in an oven, quenched, the shaft is pressed in, the rotor is turned on a lathe, then balanced. Baked stator has the housing and feet welded on, then turned on a lathe, then goes through a five-stage washer and prime line. Parts go to assemble where they are built, tested, painted, and packed.

(3) Description of Operations:

A. List Raw Materials Used: STATOR LAMINATIONS, MAGNET WIRE, INSULATION, LEAD CABLES, P.D. GEORGE 8183 POLYESTER RESIN, BLACK AQUA BAKING PRIMER, ROTOR LAMINATIONS, ALUMINUM BAR STOCK, AQUALON SMOKE GRAY AIR DRY ENAMEL

B. List Chemicals Used: P3-T5088 CLEANER) BONDRITE 1070 (PHOSPHATING-METAL PREPARATION), PARCOLENE 6 (PHOSPHATE TREATMENT TANK FOR METAL PREPARATION), HOUGHTO - SAFE 419-R (DIE CAST AREA), CITCOOL 33 CONCENTRATE (COOLANT FLUID FOR LATHE AND BROACHING MACHINE) PARCO NEUTRALIZER 700 (THIRD STAGE, FIVE STAGE WASHER), ENVIROCLEAN 110 (MART PART WASHER), TG 160 (MART PART WASHER, AND (ST-500) MART PART WASHER

C. Describe Manufacturing or Service Activities Conducted and the Final Products: ATTACHMENT A

D. Summarize each Regulated Process:

Process Description	Production Rate	Pretreatment Standard Category	Subpart	SIC Code
ELECTRIC MOTORS	60-65 UNITS/DAY	METAL FINISHING 40 CFR 433	A	3621

E. Provide on a separate sheet:

1) a schematic drawing of flow chart of each regulated process that generates wastewater.

2) a schematic drawing showing all wastewater flows (regulated and unregulated), location of any treatment system, and sampling locations and estimated flows for each individual wastestream.

3) a schemeatic process diagram which indicates points of discharge to the POTW from regulated processes.

B. Analysis of Regulated Flows:
The industrial user must perform sampling and analysis of the effluent from all regulated processes (after treatment, if applicable). Provide the analytical data for the regulated processes in the space provided below. Attach additional sheets if necessary. (Only those pollutants specifically regulated by the applicable category need be reported.)

Regulated Process: METAL FINISHING

Pollutant (mg/l)	Cd (T)	Cr (T)	Cu (T)	Pb (T)	Ni (T)	Ag (T)	Zn (T)	CN (T)	TTO	O & G	TSS	pH
Maximum	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13	52	60	6-9
Average	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	—	26	31	

Sample Location: DISCHARGE POINT FROM BUILDING

Sample Type (composite samples are required except where not feasible or where grab samples are specifically required (see 40 CFR 403.12(b)(5)(iii)): GRAB - pH, CN, O&G, TTO,
24 HR COMPOSITE (FLOW PROPORTIONAL) FOR METALS

Number of Samples and Frequency Collected: ONE TIME OR AS SPECIFIED

Analytical Methods Used: EPA STANDARD METHODS, 18TH ED - AS SPECIFIED IN 40 CFR 136

C. Analysis of Total Plant Flow (if appropriate) NOT APPLICABLE
An industrial user may sample and analyze the total plant flow and calculate an equivalent concentration limit using the combined wastestream formula if regulated process flows are mixed with other flows prior to treatment and/or sampling. Record the analytical results for all regulated pollutants below. Record the calculated concentration limits as well as the actual measured concentrations.

Pollutant (mg/l)											
MEC*											
AEC*											
AMMC*											
AAAC*											

Sample Location: _____
Sample Type (composite samples are required except where not feasible or where grab samples are specifically required (see 40 CFR 403.12(b)(5)(iii)): _____
Number of Samples and Frequency Collected: _____
Analytical Methods Used: _____

*MEC - Maximum Equivalent Concentration (derived through the combined wastestream formula)
*AEC - Average Equivalent Concentration (derived through the combined wastestream formula)
*AMMC - Actual Measured Maximum Concentration
*AAAC - Actual Measured Average Concentration

(4). Flow Measurement:

A. Total Plant Flow in Gallons Per Day (gpd):

Average 7,545 Maximum 17,895

B. Individual Process Flows in Gallons Per Day (gpd)

Regulated Process	Average Flow Rate (gpd)	Maximum Flow Rate (gpd)	Type of Discharge (Batch, etc)
MART PART WASHER	225	250	CONTINUOUS
5 STAGE WASHER (3 TANKS)	5061/Q	5625/Q	BATCH-QUARTERLY
HYDRAULIC	1000	1000	CONTINUOUS
DIE CAST QUENCH TANK	1350	1500	CONTINUOUS
SMALL ROTOR QUENCH TANK	1350	1500	CONTINUOUS
LARGE ROTOR QUENCH TANK	1350	1500	CONTINUOUS
5 STAGE WASHER (2 TANKS)	3374/MTH	3750/MTH	BATCH - MONTHLY

Unregulated Process	Average FLow Rate (gpd)	Maximum Flow Rate (gpd)	Type of Discharge (Batch, etc.)
PLANT AND EQUIPMENT WASHDOWN	20	20	
Cooling Water-	900	1000	CONTINUOUS
Sanitary Wastewater	2250	2750	CONTINUOUS

(5) Measurement of Pollutants

A. Provide on a Separate Sheet:

1) The user shall identify the Pretreatment Standards applicable to each regulated process.

2) A description of any and all wastewater treatment utilized (show treatment system location in relation to process flows and sampling points on schematic drawing required by Question 3.E.).

NONE

(6) Certification:

A. Is the facility meeting applicable categorical pretreatment standards on a consistent basis ? YES _____ NO _____ UNKNOWN NEW FACILITY

B. If no, do you require:

1) additional operation and maintenance (o&M) to achieve compliance? YES _____ NO._____

2) new or additional pretreatment facilities to achieve compliance? YES _____ NO _____

3) Name of Qualified Professional that reviewed this certification:

Name & Title _____

Signature _____Date_____

(7) Compliance Schedule:

A. If additional O&M or new or additional pretreatment will be required to meet categorical pretreatment standards on a consistent basis, attach a schedule on a separate sheet projecting increments of progress indicating dates for the commencement and completion of major events leading to compliance with the standard. Note: the final compliance date in this schedule shall not be later than the compliance date for the applicable pretreatment standard. Written progress reports are required within 14 days of each of the compliance dates specified in the compliance schedule.

B. Signatory Requirement

I certify under penalty of law that I have personally examined and am familiar with the information in this Baseline Monitoring Report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name - Authorized Representative	Signature
STEVE ELLIOTT	Steve Elliott
Official Title	Date
PLANT MANAGER	9/18/01

Attachment A-6

November 22, 2002

James Yankee
Blytheville Sewer Commission
P.O. Box 1784
Blytheville, AR 72316-1784

Dear James Yankee,

SUBJECT: DIE CAST QUESTIONS

There were three questions you asked for me to find out for you. They were:

1. How often do we empty out our water from the quenching tanks?

2. When we do empty, how much water do we empty?

3. How many pounds of Aluminum do we use a day?

To answer your first two questions, the die cast quench tank fill and drain at a constant flow throughout the day. The Rotor Assembly quench tank drains 1500 gallons per day of operation. The Die Cast quench tank drains 1500 gallons per day of operation. The Die Cast Hydraulics drains 1000 gallons per day of operation and the Die Cast Vacuum Pumps Hydraulics drains 1000 gallons per day of operation. A total of all water that goes down the drain from four different areas is about 5000 gallons per day of operation. On the third question we use about 695 pounds of Aluminum per day of operation. I hope this answers your questions. If you have any other questions please give me a call. Thanks for all your help and have a great day.

Sincerely,

Chris Sullivan

MOTOR TECHNOLOGIES GROUP
4025 EAST STATE HIGHWAY 18
BLYTHEVILLE, AR 72315
(870) 776-1297

Attachment A-7

1.0 Purpose:

1.1 To establish a Spill Prevention, Control and Response Plan to be used at NIBCO Blytheville Division.

2.0 Scope:

2.1 This Work Instructions sets forth guidelines for use by Nibco associates to Prevent, Contain, Control, and Respond to hazardous and nonhazardous spills.

3.0 Certification:

3.1 The signing of appropriate associates from the Environmental and Safety Department as well as the Plant Manager will indicate approval of this plan.

4.0 General Information:

4.1 Facility: NIBCO INC. Blytheville Division
4059 Hwy. 18 E
Blytheville, AR 72315
Mississippi County

Parent Company: NIBCO INC.
500 Simpson Ave.
Elkhart, IN

4.2 Emergency Contacts:

4.2.1	Danny Quick	Plant Manager	ext. 242
	Home Phone:	870-763-5669	
4.2.2	Freddy Gentry	Environmental Supervisor	ext. 269
	Home Phone:	573-888-0185	
4.2.3	Rob Brooks	Safety Technician	ext. 243
	Home Phone:	870-762-2632	
4.2.4	Blytheville Fire Department		
	Non-Emergency	763-6866	
	Emergency	763-6844	
4.2.5	Chemtel Inc.	813-979-4620	
	24 Hr. phone	800-255-3924	

4.3 Site Description and Product

4.3.1 The facility includes two main buildings, which we will designate North building and South Building. The North Building includes Assembly and Testing, Rubber Molding operations, Shipping and General Warehousing. The South building includes the Foundry, Machine Shop, Tool Room and Maintenance Departments.

4.3.2 It is located on Hwy. 18 in Blytheville's Industrial Park. Hwy. 18 is to the north, Hwy. 151 is to the east, there are train tracks to the south and a service road to the west. The entire facility is 43 acres and is surrounded by a six-foot tall chain link fence.

4.3.3 Nibco Blytheville manufactures multi-turn and quarter-turn industrial and commercial valves. Butterfly, Gate, and Check valves are produced from cast iron and Ball valves are assembled from several types of steel. The production process begins with the melting of scrap steel, returns and pig iron with the use of coreless induction furnaces in the foundry. Iron is formed in one of three greens and molding lines using chemically bonded cores. The valve parts are shaken out of the molds, cooled and cleaned in the grinding and cleaning room. Valve parts are then machined, assembled and tested before being shipped to the distribution centers. During this process some valve bodies go through a Powder Coating operation while others are painted. Butterfly bodies go through a Rubber Molding operation where rubber is applied to the inside of the casting.

4.3.4 Several chemicals are used in the Coreroom process, noncontact-cooling water is used to cool the furnaces and silica sand is used in the molding process.

Cutting fluids and coolant are used in the machine shop area along with oil. Various departments have Parts Washers supplied by Crystal Clean services which have flammable material in them. Flammable Prep chemicals are used in the powder and rubber coating operations. The painting operations also have flammable paints. The Foundry Lab has small quantities of chemicals that are used in various testing procedures.

4.3.5 Sections 3 and 4 of the Storm Water Pollution Prevention Plan (SWPPP) gives detailed information for potential spill areas as well as a site map where these areas are located. (Original Controlled Copy Located in Env. Department)

4.4 Associate Information

4.4.1 The Foundry works Monday through Thursday 10 hours a day, second and third shifts are skeleton crews to keep watch on the furnaces and make repairs.

4.4.2 The machine Shop works Monday through Friday 8 hours a day for 2 shifts.

4.4.3 Assembly works Monday through Friday 8 hours a day 1 shift.

4.4.4 Office personnel including shipping and receiving work Monday through Friday.

4.4.5 There are approximately 250 associates at this time.

4.4.6 An outside company handles security and works from 3 PM until 7 AM 5 days a week and 24 hours a day on weekends.

4.5 Preventive Maintenance

4.5.1 Spill containment and control equipment is located throughout the facility for small spills. Large spills will be cleaned up by outside companies.

4.5.2 A monthly inspection is performed per our SWPPP (Storm Water Pollution Prevention Plan) to help locate potential spill areas as well as air pollutants.

4.5.3 The maintenance department performs PM (preventive maintenance) on a daily, weekly, BI-weekly, and monthly bases.

4.5.4 Associates are required to report all leaks, spills or potential problems to their supervisor to help prevent discharges to the environment.

5.0 Chemical Inventory

5.1 A List of all chemicals used at this facility will be kept in the Environmental Compliance office and on the file server (G:\EPA\Chemical List).

5.2 A MSDS Book will be kept at each plant for quick reference. These books will be accessible to all associates. See Diagrams 1and 2 for locations of MSDS stations.

5.3 All MSDS's are located on the file server and can be accessed from any network computer by clicking on the MSDS Information Icon located on each desktop.

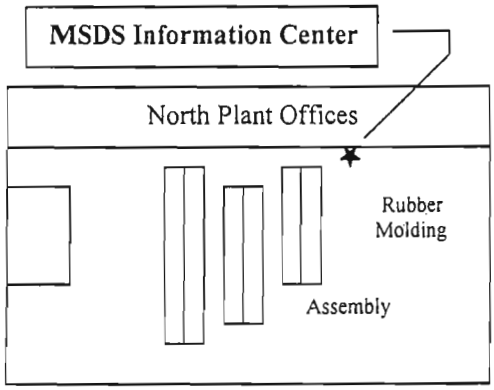
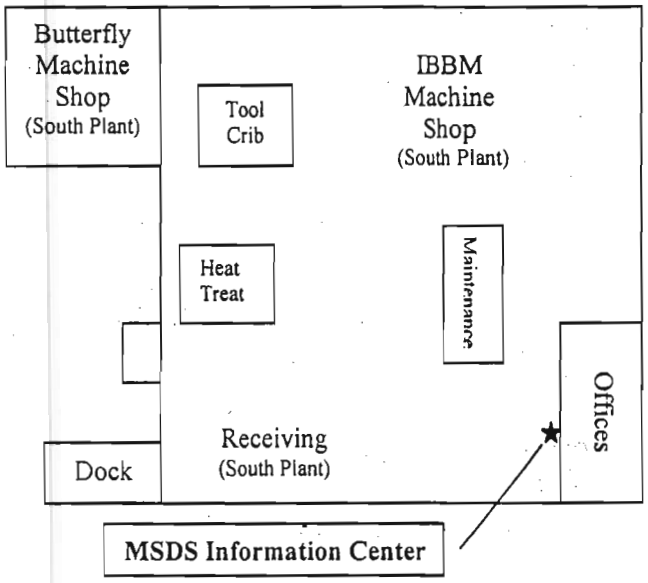


Diagram 1

Diagram 2



6.0 Potential Spill Sources

6.1 North Plant

6.1.1 Rubber mold area has a rack containing oil, antifreeze, and release agent; there is an inside temperature controlled storage room for chemicals. Potential spills of prep material used in rubber coating and paint from the small paint booth are also located in this area.

6.1.2 The large paint booth has potential spills of paint and thinner created by the painting process.

6.1.3 Testing department has potential spills chemicals used in the leak detection process. Shipping/Receiving has potential spills of incoming tanks and drums.

6.1.4 A propane storage tank and fill area is located on the West Side the building.

6.2 South Plant

6.2.1 Machine shop has coolant and cutting fluid located on most machines. There is also an area designated for oil, which contains drums and totetanks.

6.2.2 Receiving has potential spills of incoming tanks and drums.

6.2.3 Foundry has tote tanks and 55-gallon drums of core chemicals and release agents.

6.2.4 Coreroom has 2 acid scrubbers one with Phosphoric Acid and the other with Sulfuric acid.

6.2.5 A chemical storage building is located to the west of the foundry.

6.2.6 A fuel storage building is located beside the west exit road.

6.2.7 An oil storage building and a used oil storage building are located on the west side.

6.2.8 A chip trailer containment building is located on the west side.

6.2.9 A propane storage tank and fill area is located on the West Side the building.

6.3 Identification of spill containment equipment.

6.3.1 All floor drains have been closed to eliminate discharges to the POTW (Publicly Owned Treatment Works).

6.3.2 Dakota Acid Scrubber in the core room has a containment pit around it.

6.3.3 Chemical storage building has a sloped floor with a catch pit at the back.

6.3.4 Oil storage and chip trailer buildings have containment pits around them.

6.3.5 Fuel storage has a containment wall inside.

6.3.6 One half of the Powder Coating building, which is used for dip painting, is fire proof and has a containment pit located towards the back.

7.0 Spill Prevention Control and Response

7.1 In the event of a spill or discharge the following provisions will be followed in the order in which they are listed.

7.1.1 Safety – Associates should never be placed or place themselves in a situation that may cause harm to their general health.

7.1.2 Assistance/Notification (tell your immediate supervisor).
Spill containment, diversion, isolation, and treatment as recommended by the MSDS.

7.2 Spill and Clean-Up Equipment

7.2.1 Oil dry is located in various places throughout both the North and South buildings.

7.2.2 Sand can be used in the foundry to absorb Non-hazardous spills.

7.2.3 There is a spill clean up kit located in both buildings.

7.2.4 There is an acid spill clean up kit located in the rack beside the Foundry Managers office.

7.2.5 See diagrams 3, 4 and 5 for locations of spill clean up kits.

Diagram 3

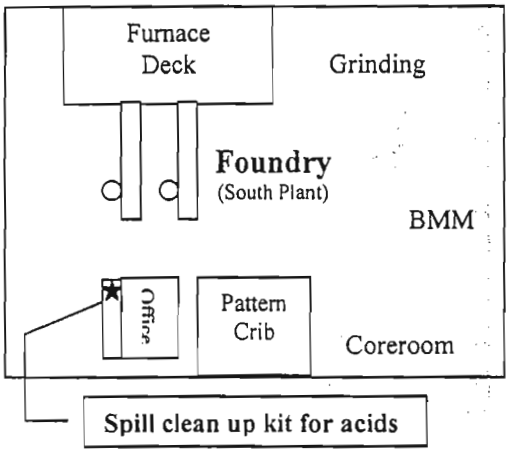


Diagram 4

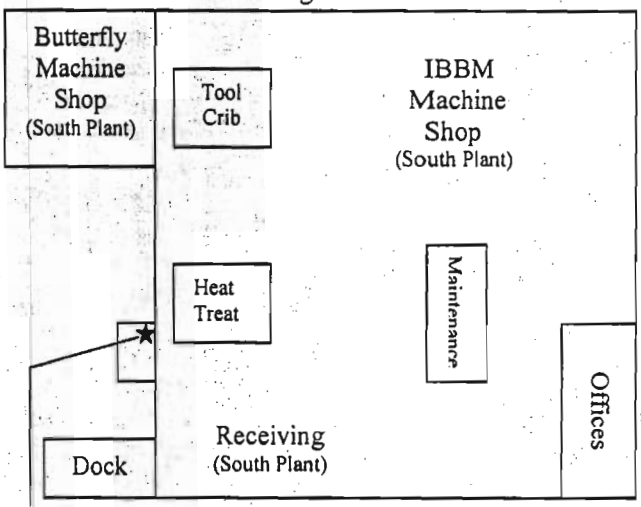
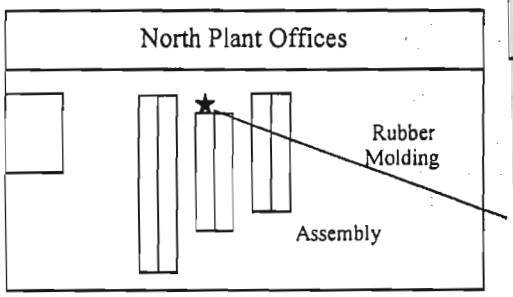


Diagram 5



7.3 Spill Prevention Control

7.3.1 Secondary containment should be adequate to provide safe and secure storage areas. Storage must be adequate to prevent escape or movement of hazardous materials into surface waters and storm and sanitary sewers, and soil or ground water contamination, in the event of a failure of a tank or a release of a hazardous material from a tank.

7.3.2 Secondary containment area must be able to contain 20% of the maximum volume stored or at least 150% of the volume of the largest tank, whichever is greater.

7.3.3 A secondary containment area must be properly maintained and must be free of vegetation, cracks, open seams, open drains, siphons or other openings.

7.3.4 Storm water, which collects within a secondary containment area, must be removed often enough to maintain the available capacity of the secondary containment area section 7.3.2.

7.3.5 Hazardous material transfer areas. No HMT's were recognized at this facility.

7.4 Spill Response to Incidental Releases

7.4.1 Responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by associates in the immediate release area, or by maintenance personnel are not considered to be emergency response within the scope of the standard.

7.4.2 Releases of hazardous substances where there is no potential safety or health hazard (i.e., fire, explosion, or chemical exposure) are not to be considered to be emergency responses.

7.4.3 Materials manufactured specifically for the control of the chemical involved in the release shall be used in the control and containment of any hazardous material, and the clean-up shall be directed by the Plant Environmental (Technical Services) Supervisor or the Plant Safety Technician.

7.4.4 Clean up and disposal of the materials will be done according to the instructions from the appropriate MSDS.

A-7d

7.5 Emergency Response

7.5.1 As defined in 29 CFR 1910.120, Emergency response" or "responding to emergencies" means a response effort by associates from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance

7.5.2 In the event of a spill requiring an emergency response, the control, containment and clean up of these releases will be done by an outside Emergency Response provider. (see section 4.2)

7.5.3 Designated associates (i.e. supervisors) will be trained to fulfill their responsibilities during response actions for spills or threatened releases identified as requiring emergency response.

7.5.4 All supervisors will be trained to recognize situations requiring outside help, to notify the outside Emergency Response Provider in the event an emergency response is required, and to evacuate the premises as required ensuring the safety of all other persons.

7.5.5 Any associate discovering the release of a potentially toxic or hazardous material that is not already being controlled must report it to his/her immediate supervisor.

7.5.6 The supervisor shall evaluate the situation and take the appropriate action to eliminate the release while assuring safety and security of all associates. The supervisor should then notify the Emergency Contacts listed in Section 4.2.

7.5.7 In the event of a release of a hazardous substance where there is a potential safety or health hazard (i.e., fire, explosion, or chemical exposure), associates will be evacuated from the worksite location per the Emergency Action and Fire Plan (SA-01).

7.5.8 The associates will not be allowed to assist in handling the emergency. The emergency response provider will immediately be contacted to contain the release. (see section 4.2)

7.6 Release Notification and Record Keeping

7.6.1 For any discharge that could cause problems to the POTW (publicly owned treatment works), including any sludge loadings, the POTW will be notified.

7.6.2 A typical notification will include the following.

7.6.2.1 The date, time, location and duration of the discharge

7.6.2.2 The type of waste including concentration and volume.

7.6.2.3 Any corrective actions taken by the facility.

7.6.3 Within five (5) days following such a discharge a written report will be submitted describing the cause of the discharge and the measures that will be taken to prevent similar future discharges. These items should be discussed in the follow-up report.

7.6.3.1 Cause of the incident.

7.6.3.2 Specific details of the incident (time, volume and concentration of pollutants released, damage, etc.)

7.6.3.3 Remedial measures undertaken.

7.6.3.4 Preventive mechanisms to avoid a recurrence of similar incidents.

7.6.3.5 Other information as required by POTW's spill response system.

7.6.4 For any discharges to the environment the SWPPP (storm water pollution prevention plan) will be used.

7.6.5 The Plant Safety Technician assisted by the Plant Environmental (Technical Services) Supervisor shall complete a report of each spill; the report shall be reviewed by the plant manager and filed.

7.6.6 Shipments of all hazardous materials and hazardous wastes generated by a clean-up operation shall be in compliance with all applicable State, Federal and Local solid waste regulations.

8.0 Work Practices

8.1 Prohibited activities - No NIBCO associate or contractor associate working at the facility shall:

8.1.1 Attempt to provide emergency response as defined in this Plan (see section 7.5).

8.1.2 Attempt to begin a response action to a spill or threatened release outside their immediate work area with the exception of maintenance personnel.

8.1.3 Associates will not attempt to clean up an incidental spill as defined in this Plan without first receiving the necessary HAZ COM training.

8.1.4 Attempt to clean up an incidental spill as defined in this Plan without first donning and testing the necessary PPE (personal protective equipment).

8.1.5 Attempt to clean up an incidental spill as defined in this Plan without first having the necessary containment, decontamination and disposal supplies/equipment at the site.

8.1.6 Attempt to dispose of recovered hazardous materials without first making proper arrangements for completing the required record keeping and manifests for disposal of the hazardous material.

8.2 Associate responsibilities First Responder Awareness Level (OSHA 1910.120.Q.6.i) - All associates are responsible for their immediate work area and shall:

8.2.1 Know and use safe handling practices and required PPE.

8.2.2 Know and use appropriate spill response procedures for each hazardous material handled in the work area.

8.2.3 In the event of a spill or threatened release, make an initial assessment of the hazards and immediately notify their immediate Supervisor with the following basic information.

8.2.3.1 Material Spilled

8.2.3.2 Approximate Quantity

8.2.3.3 Location

8.2.3.4 Other Immediate Hazards (fire, explosion)

8.2.3.5 Injuries Involved

8.2.3.6 Immediate Actions Taken

8.3 Supervisors Responsibilities First Responder Operators Level (OSHA 1910.120.Q.6.ii)

8.3.1 Know and use safe handling practices and required PPE.

8.3.2 Know and use appropriate spill response procedures for each hazardous material handled in the work area.

8.3.3 In the event of a spill or threatened release, make an initial assessment of the hazards, determine the need for emergency response by the outside Emergency Response Provider (HAZMAT) and take appropriate action to notify the Safety and Environmental Supervisors.

8.3.4 In the event of a Spill Incident, notify plant management as well as the Safety and Environmental Supervisors.

8.3.5 Insure that the operators are trained in accordance to this plan. Brief the outside Emergency Response provider on the current situation upon their arrival.

8.3.6 Provide Plant Environmental Supervisor information necessary to prepare shipping manifests for hazardous waste generated as a result of the spill or emergency response.

8.3.7 Provide the Plant Safety Tech and Environmental Supervisor information necessary to complete spill incident or emergency response report.

8.4 Plant Environmental Supervisor Responsibilities

8.4.1 Insure the Associates, Supervisors and Plant Management are adequately trained in the procedures of the Plan by periodically reviewing the content of the training program, providing site specific training and maintaining records of training.

8.4.2 Insure that all associates are adequately trained in the provisions of HAZ COM.

8.4.3 Review and implement the training requirements of this plan.

8.4.4 Prepare shipping manifests for hazardous waste shipments generated by a spill incident or emergency response.
8.4.5 Oversee shipments of hazardous waste and disposal.
8.4.6 Maintain plant records for hazardous waste shipments and disposal.
8.4.7 Notify the State, Federal and/or local regulatory agencies, as appropriate, when a reportable spill occurs and provide regulatory agency liaison.
8.4.8 Monitor developments in local, state, and federal regulations and advise management of the compliance status of the facility.
4.4.9 Complete the spill incident or Emergency Response report.
8.4.10 Coordinate the services of the outside Emergency Response provider (HAZ MAT Team).
8.4.11 Coordinate the provisions of this Plan with the outside Emergency Response provider, (HAZMAT Team), local fire department, police, and emergency medical service providers.
8.4.12 Audit the performance of the Plan at least annually
8.4.13 Provide recommendations to Plant Management, the corporate Safety and Health Director and the Corporate Environmental Engineer.
8.4.14 Maintain information on hazardous materials present at the facility in the form of MSDS's as part of the Hazardous Communication Program.
8.4.15 Maintain MSDS information database.
8.4.16 Audit hazardous material storage areas and handling procedures, including labeling, manifesting and Spill Prevention Inventory List.
8.4.17 Review, select and purchase the necessary PPE and spill response supplies.

8.5 Associate Training
8.5.1 All associates will be instructed to the procedures of this Plan when it becomes implemented and at times when significant changes to the plan are made.
8.5.2 Associate training shall include:
8.5.2.1 Identification of hazardous chemicals and determination of emergency response requirements.
8.5.2.2 Instructions as to the Emergency Action and Fire Plan Procedure (SA-01) as well as the nearest fire extinguisher.
8.5.2.3 Instructions in the proper use of spill response supplies.
8.5.2.4 Any operations in the area where they will be working where hazardous chemicals are present, and what the effects of the hazardous chemicals are.
8.5.2.5 Instructions in the proper PPE that should be used in handling or working around hazardous chemicals.
8.5.2.6 First Responder responsibilities, Mastery Training ourse: Handling Hazardous Materials: HAZWOPER Training.
8.5.2.7 Location of the Spill Control and Response Plan and MSDS files.
8.5.3 A permanent notice will be posted at the MSDS Information Center advising all associates when and whom to call in the event of a dangerous discharge for which notification is required.

Attachment A-8

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 6th day of February, 2007.

Approved By: James Yankee

Pretreatment Coordinator

TABLE OF CONTENTS

A86

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.

2-6-2007
Effective Date

Steve Smith
Authorized Signatory (Print)

Steve Smith
Authorized Signature

GM
Title

If authorized signatory at left is a (3) above, she/he is authorized by:

Name (Print)

Signature

Title

Authorization Revoked by:

Signature of a Current Authorized Signatory

Date Revoked

Attachment A-9

Resolution No. 2001:31

A RESOLUTION ENDORSING THE IMPLEMENTATION OF A WASTEWATER PRETREATMENT PROGRAM FOR THE PUBLICLY OWNED TREATMENT WORKS (POTW) OF BLYTHEVILLE, ARKANSAS

WHEREAS, the City of Blytheville has the duty and desire to protect the public health, safety and welfare; and

WHEREAS, the City of Blytheville has the authority to implement uniform requirements for discharges into the POTW in accordance with all applicable State and Federal laws relating thereto; and

WHEREAS, the City of Blytheville determines the need to prevent the introduction of pollutants into the POTW which will interfere with the operation and maintenance of the POTW; and

WHEREAS, the City of Blytheville determines the need to prevent the introduction of pollutants into the POTW which will pass through the POTW, inadequately treated into the receiving waters or the atmosphere or otherwise be incompatible with the POTW; and

WHEREAS, the City of Blytheville desires to improve the opportunity to treat the wastewaters from the POTW; and

WHEREAS, the City of Blytheville desires to provide for equitable distribution among users of the cost of the Publicly-Owned Pretreatment Works;

NOW THEREFORE, BE IT RESOLVED that the City of Blytheville, Arkansas endorses the implementation of a Wastewater Pretreatment Program in accordance with all applicable State and Federal laws required by the Federal Water Pollution Control Act (FWPCA, P.L. 92-500), as amended by the Clean Water Act of 1977, P.L. 95-217, and the General Pretreatment Regulations (40 CFR, Part 403).

PASSED AND APPROVED this 18 day of December, 2001

CITY OF BLYTHEVILLE

By: _____
Barrett Harrison, Mayor

Attest:

Grace Haynie
City Clerk

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

EPA NPDES Compliance Inspection Report

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

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [ ] 2 [5]	3 [AR0022560] 11	12 [070326] 17	18 [G]	19 [S]	20 [1]

Remarks
21 [PRETREATMENT PROGRAM AUDIT] 66

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

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [ ] 2 [5]	3 [AR0022560] 11	12 [070327] 17	18 [U]	19 [S]	20 [2]

Remarks
21 [04 SIU SITE VISITS] 66

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

Section B: Facility Data

Name and Location of Facility Inspected
City of Blytheville's Pretreatment Program
PO Box 1784
Blytheville, AR

Entry Time [X] AM [ ] PM: 7:00 3/26/07
Exit Time/Date: 2:00 pm 3/28/07
Permit Effective Date: 12/1/05
Permit Expiration Date: 11/30/10

CODE SHEET

Pretreatment Audit

		CODE
Auditor's Name	Gillam	
Permit Number	AR0022560	
Audit Date	3/26-28/07	DTIA
Date Permit Modified to require pretreatment	3/21/86	PTIM

PPETS WENDB DATA ELEMENTS

Significant IUs without Control Mechanisms	0	NOCM
Number of Significant IUs	6	SIUS
Number of Categorical IUs	4	CIUS
Technical Evaluation for Local Limits	Y	EVLL
Adoption of Technically-Based Local Limits	Y	ADLL
Significant IUs not inspected or sampled	0	NOIN*
Significant IUs in significant noncompliance with standards or reporting	0	PSNC*
Significant IUs in significant noncompliance with self-monitoring	0	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	0	SNIN*