ADEQ

ARKANSAS
Department of Environmental Quality

June 11, 2013

Kenneth Ellis
Wastewater Superintendent
Blytheville Wastewater Department
P.O. Box 1784
Blytheville, Arkansas 72316

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

Dear Mr. Ellis,

Please find enclosed the finished report for the audit/assessment conducted May 21st through May 23rd, 2013. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the recommendations and required actions.

Please respond in writing within thirty (30) days to the audit findings with proposed corrective actions.

It was a pleasure working with you and 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 at gilliam@adeq.state.ar.us or (501) 682-0625.

Sincerely,

Allen Gilliam

Allen Gilliam
State Pretreatment Coordinator

Encl: Audit/Assessment Checklist

ec: Rudy Molina/EPA 6WQ-PO
Jason Bolenbaugh/NPDES Inspector Manager
Craig Uyeda/NPDES Enforcement Manager

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF BLYTHEVILLE, ARKANSAS

NPDES PERMIT #AR0022560

June 11, 2013

PREPARED BY: ALLEN GILLIAM

ADEQ STATE PRETREATMENT COORDINATOR

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Reportable Noncompliance (RNC) Worksheet

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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 May 21 through May 23, 2013, of the Pretreatment Program implemented by the City of Blytheville, Arkansas. Participants included:

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

The goals of the audit/assessment were:

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

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

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

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

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

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

The City has three (3) wastewater treatment plants: the North, South and the West POTWs. All three (3) are activated sludge biolac systems with diffused air in the first cell, return activated sludge with remaining sludge wasted to holding cells. Wastewater from the second aerated cell continues to a final clarifying cell then discharged after ultraviolet disinfection.

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

The North POTW receives all the City's Significant industrial wastewater flow estimated at 25% of its average flow of 0.6 MGD from five (5) significant industrial users (SIUs), four (4) of which are categoricals. The South POTW has no SIU contributions to its average flow of 0.66 MGD. The West POTW has no SIU contributions to average flow of 0.72 MGD.

The West and South POTWs are required to conduct whole effluent toxicity (WET) testing. There has been no pattern of toxicity indicated from these facilities over the last three (3) years. The North POTW is a minor but quarterly WET testing (for one year) was conducted with its effluent failing lethality and sublethality on the water flea the first quarter, but passed the final three quarters.

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)(vi)(A)*** Obtain remedies for noncompliance by any Industrial User with any Pretreatment Standard and Requirement..."

1a) And under the City's ***Pretreatment Program, Sec. III, the Enforcement Response Plan's (ERP) Guideline*** for Monitoring and Reporting Violations, "Reports are always late or no Report at all", the City's enforcement options are that it will either issue an Administrative Order with [a] fine, conduct a show cause hearing or take Civil Action.

During the file review it was discovered the industries permits required "The permittee to 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." (see Attch. A-1e)

No submittals or subsequent enforcement actions by the City could be produced. The City must enforce this permit and (City imposed) Pretreatment requirement.

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

The industry inspections are not comprehensive (see Attch. A-4 for example), but included only basic/vague information (in some cases, none) regarding the various IU's processes, wastestreams' identification, chemicals handling, raw material, end products, pretreatment system evaluation, etc.

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

If comprehensive/current process/pretreatment narratives and wastewater schematics are already in each IU's file, the inspections could reference this fact. Once a comprehensive inspection has been completed for each permitted IU and formalized as a MS Word document (or other software), those could be printed out and used in subsequent inspections to make any updates found.

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

Even though the City does all the sampling for its IUs, not all reports included process flow separately from the entire facility flow. The regulated wastewater must be identified and separately reported. If it is unfeasible to measure the regulated vs. total plant flow, an explanation of the estimated regulated flow must be provided.

The four (4) IUs visited during this audit were batch dischargers with most having marked lines on their holding tanks showing gallons in increments of 500 and/or 1,000 gallons. It should not be difficult to determine how much process wastewater was batch discharged to add to the report.

4) Under ***403.12(b)(3)***, "The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification [and their NAICS] 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 process descriptions and updated schematics from their IUs. The IUs' files reviewed had very general process narratives. The wastewater schematics were not accurate and

were also general in nature. These need to illustrate the actual process layouts at the facilities. It was difficult to determine work piece/wastewater flow and general layout of all wastewater generating operations.

Send the IUs the schematics and process descriptions you have on file for them to update and produce something more comprehensive. It is the industries' requirement to update them as necessary and submit for the City's files to be complete.

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

1) STRONG recommendation to begin summarizing the business/industry surveys into one "master list". This compilation should include which businesses/industries have chemicals on-site, what type of processes they conduct (if any), do they discharge this process wastewater, disposal methods, floor drains, and a column reflecting "sanitary only" to strike it from being surveyed again in the future. See Chapter 2 of EPA's "Guidance Manual for POTW Pretreatment Program Development" (10/93) @ http://www.epa.gov/npdes/pubs/owm0003.pdf for additional information regarding IU surveys and some examples of a master list with details and pertinent information to be gathered.

2) STRONG recommendation: If it turns out the City's permitted IUs are not contributing mercury (Hg), conduct outreach to the City's residents regarding its possible Hg problems. With the possibility of all three (3) wastewater treatment plants having Hg permit limits in the future, contributions from consumer goods may be a possible source to be reduced.

A newspaper ad outlining what this "Hg problem" may mean to the City's taxpayers may result in more attention paid to what the residents are using for cleaning products, cosmetics, etc. and how to help reduce the Hg entering the City's collection system. A thorough review of the internet will provide the City with domestic products containing Hg. NEWMOA @ http://www.newmoa.org/prevention/mercury/ is the nation's best repository for Hg sources. There are numerous other "mercury sources" hotlinks on the internet that also may be of great use; http://www.nydailynews.com/life-style/health/mercury-found-lotions-cosmetics-fda-products-sold-ethnic-neighborhoods-online-article-1.1034686 being another one.

3) The City has a good start on a comprehensive Fact Sheet per industry (see Attch. A-2 for example). Continue construction on these Fact Sheets to include a more comprehensive narrative description of their manufacturing and Pretreatment processes, updated schematics, latest application (as an attachment), categorical determination (if applicable), rationale for permit limits, monitoring frequency, parameters monitored for, compliance history, etc.

See Appendix F of EPA's "Industrial User Permitting Guidance Manual" (9/12) @ http://cfpub.epa.gov/npdes/docs.cfm?document_type_id=1&view=1&program_id=3&sort=date_published for an example fact sheet template.

4) Recommend including P2, Best Management Practices (BMP), water and energy consumption reduction questions in all IU surveys and permit applications. The information could help identify and locate new significant industrial users as well as those business/industries with Pollution Prevention (P2) opportunities.

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

6) Continue implementing and enforcing the grease trap program City-wide. The City reported seventeen (17) sanitary sewer overflows (SSOs) because of grease blockages during '09, but down to fifteen (15) during 2012.

7) Recommend sending the hazardous waste notifications in 40 CFR 403.12(j) and (p) to any new generators identified on the current ADEQ list provided during the audit.

8) During the file review the IUs' 100 mg/l O&G permit limit was discussed. City personnel seemed more concerned with hydrocarbon based O&G not the animal or vegetable O&G. If this is the City's focus, their IU permits should be modified to replace the O&G limit with a Total Petroleum Hydrocarbon (TPH) limit and specify method 1664B.

The City's Pretreatment Ordinance would then have to be modified as Section 2.1.B.(6) prohibits petroleum oil from being discharged into the collection system.

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) The City must include a procedures section in its Pretreatment Program narrative regarding Slug Potential Evaluations. Example language has been sent by this office.

2) It is recommended to include in the City's Program narrative its sources for locating industries/businesses for future IU surveys.

* * * * * * * *

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 Tracking 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: jlyankee@att.net
Pretreatment program approval date: 3/21/86

Dates of approval of any (non-)substantial modifications: 8/1/07 (Streamlining)

Month Annual Pretreatment Report Due: August

Pretreatment Year Dates: 8/1 - 7/31 Date(s) of Audit: 5/21 - 23/13 (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	5/11	Inadequate data on Aviation Repair Tech.; Kagome was not published for being SNC; Omnium was not sampled for O&G, CN, TSS, pH & BOD per their permit

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	8/1/11	7/31/16
AR0022578	South	1/1/08	12/31/12
AR0022586	North	4/1/12	3/31/17

* 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: 4952 NCR 635

Expiration Date of NPDES Permit: see above

Treatment Plant Wastewater Flow: Design- 1.5 MGD; Actual (Avg)- 0.725 MGD

Sewer System: 100 % Separate; # grease related SSOs: 7

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		Extended Aeration; Activated Sludge/
Secondary	✓	Biolac; clarifier; sludge lagoon;
Tertiary		aerated settling basin; polishing pond

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; propagation of desirable species of fish & other aquatic life

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

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

List of toxic pollutant limits in NPDES permit: conventionals, NH3-N, WET; Cu and Hg

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for the 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. (e.g. Is there an ongoing TRE?) Passed WET for the last 3 years. No lethality or sublethality for either species.

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

Parameters Violated	Cause(s)
fecal coliform (5/31 & 6/30/12)	Hydraulic overload

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: 4001 NCR 647

Expiration Date of NPDES Permit: 12/31/12

Treatment Plant Wastewater Flow: Design- 1.4 MGD; Actual (Avg)- 0.664 MGD

Sewer System: 100 % grease related SSOs 5

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		
Secondary	✓	Extended aeration; activated sludge/
Tertiary		biolac; clarification & 2 polishing ponds

Method of Disinfection: Ultraviolet

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Drainage ditch #17; then #6; then #1; then St. Francis R.

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

Receiving Stream Use: Secondary contact recreation; r.w. source for public, industrial & AG water supplies; propagation of desirable species of fish and other aquatic life

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

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

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

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for the 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. (e.g. Is there an ongoing TRE?) No WET failures in the last 3 years (6 tests)

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

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

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

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

YES NO N/A

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

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

Parameters Violated	Cause(s)
None	

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: 5601 NCR 725

Expiration Date of NPDES Permit: 3/31/17

Treatment Plant Wastewater Flow: Design- 0.8 MGD; Actual (Avg)- 0.6 MGD

Sewer System: 100 % grease related SSOs 3

Industrial Contribution to this Treatment Plant

# of SIUs: 5 # of CIUs: 4

Industrial Flow (mgd): 0.15 Industrial Flow (%): 25 %

Level of Treatment		Type of Process(es):
Primary		Extended aerated activated sludge/
Secondary	✓	Biolac, clarification and polishing
Tertiary		pond

Method of Disinfection: Ultraviolet

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Ditch #30, then ditch #27, then left chute of Little River, thence to the St. Francis River

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

Receiving Stream Use: Secondary contact recreation; r.w. source for domestic, industrial & AG water supplies; propagation of desirable species of fish & other aquatic life.

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

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

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

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for the 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. (e.g. Is there an ongoing TRE?) Once/quarter testing (only) has shown only 1 lethal and 1 sublethal effect to the water flea in June of 2012.

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)
None	

Section II: Pretreatment Program Analysis

C. Control Authority Pretreatment Program Modification [403.18]

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

1. Modifications: *N/A*

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

2. Modifications in Progress: *None*

Date Requested	Nature of Modification

___	✓	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
Date of most recent Ordinance approved by the Control authority: 8/21/07
Date of most recent Pretreatment Program modification approval: 8/1/07

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

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

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: _____

Section II: Pretreatment Program Analysis

YES NO

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

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

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

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

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

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

Briefly describe other problems: _____

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

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

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

YES NO

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

___ ✓ 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 *(Not written*
✓ Review of plumbing/building permits *in Program)*
✓ Review of water billing records
✓ Permit reapplication requirements
✓ Onsite inspections
___ Citizen involvement
✓ Other (specify) City building permits

Section II: Pretreatment Program Analysis

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.*

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

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

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

a. 5 SIUs (As defined by the Control Authority)
b. 4 Categorical Industrial Users (CIUs)
c. 1 Noncategorical SIUs
d. 5 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(v)(1)(i-ii)]

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

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? 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	
n/a	___	Does Control Mechanism designate a discharge point? [403.5(b)(8)]
n/a*	___	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
*"domestic only"	

Section II: Pretreatment Program Analysis

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 office.

YES NO

___ ✓ 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	

G. Applications of Pretreatment Standards and Requirements

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

2/19/09 Date Notified Letter Method of Notification

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

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

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change

YES NO

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

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

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

Section II: Pretreatment Program Analysis

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

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	"

Section II: Pretreatment Program Analysis

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

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

Does the Control Authority routinely split samples with industrial personnel:

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

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

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

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

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

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 and use clean sampling techniques

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
✓	___	Unscheduled compliance monitoring *(sampling)*
n/a	___	Demand monitoring for IU compliance
n/a	___	IU self-monitoring
___	___	Other: _____

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

Section II: Pretreatment Program Analysis

I. ENFORCEMENT

YES	NO	
✓		Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)]
✓		Does the Control Authority have a written enforcement response plan? [403.8(f)(5)]. If yes, does the plan:

YES	NO	
✓		Describe how the Control Authority will investigate instances of noncompliance
✓		Describe the Control Authority's types of escalating enforcement responses and the periods for each response
✓		Identify by Title the Official(s) responsible for implementing each type of enforcement response
✓		Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

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

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

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

✓	Imprisonment
✓	Termination of Service
✓	Other: severance of water 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?
✓		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
n/a					

Section II: Pretreatment Program Analysis

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 (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements
0	0	Reporting requirements
0	0	Pretreatment compliance schedule

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

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

Has the Control Authority experienced any of the following:

YES	NO		EXPLAIN and ID Industrial User
	✓	Interference	
	✓	Pass through	
	✓	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?

YES	NO	
	✓	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	$

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

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

Section II: Pretreatment Program Analysis

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
✓		Inspections ~~and Sampling schedule~~ *(only)*
✓		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: Mercury levels may become a City-wide issue. Pretreatment personnel are currently trying to identify sources.

✓ ___ 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

0.6 - Deemed adequate, but it was suggested to bring in another employee for cross-training in the Program's day-to-day procedures.

___ ✓ Have any problems in program implementation been observed which appear to be related to inadequate funding?
If yes, describe and show below the source(s) of funding for the program:

_____

_____

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

___ ✓ Is funding expected to continue near the current level? If no, will it:
Increase ____ or Decrease ____
If no, describe the nature of the changes:

_____

_____

Section II: Pretreatment Program Analysis

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

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

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓		Sampling equipment	ISCO automatic (3); portable pH meters
✓		Safety equipment	Gas detectors, ropes, harnesses, blowers, respirators, etc
✓		Vehicles	2003 Ford 150
✓		Analytical equipment	Equipment for conventionals (BOD, TSS & NH3)

L. POLLUTION PREVENTION

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

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

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

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

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

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

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

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Motor Appliance File/ID No. 10
Industry Address: 300 Industrial Dr.
Industry Description: Mfg of various sized battery charger enclosures
Industrial Category: Metal Finishing 40 CFR 433 SIC/NAICS Codes: 3629/332813
Avg. Total Flow (gpd): 2,000 Avg. Process Flow (gpd): 1,250 batched/quarter

Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name Motor Tech. (Regal Beloit) File/ID No. 6
Industry Address: 4025 E. Highway 18
Industry Description: Mfg and assembly of electric motor parts
Industrial Category: metal finishing & Al die cast 40 CFR 433 & 464 SIC/NAICS Codes: 3621/332813,335312
Avg. Total Flow (gpd): 10,000 Avg. Process Flow (gpd): 7,500 batched/quarter

Industry visited during audit: YES

Comments: Negligible quench wastewater generated/batch discharged from the aluminum die-casting (CFR 464) ops.

FILE #: 3 Industry Name Siemens (used to be SRT) File/ID No. 13
Industry Address: 101 Terra Road
Industry Description: Machining/Maintenance on steel mill equip. w/Cr & Ni plating
Industrial Category: Metal Finisher 40 CFR 433 SIC/NAICS Codes: 7692/332813, 333319
Avg. Total Flow (gpd) 4,800 Avg. Process Flow (gpd): 2,500 batched/quarter

Industry visited during audit: YES

Comments: permit has three (3) outfalls w/limits

FILE #: 4 Industry Name Winfield - Omnium File/ID No. 8
Industry Address: 400 Terra Rd.
Industry Description: Formulation/packaging/re-packaging of pesticides
Industrial Category: Pesticide Chemicals 40 CFR 455 SIC/NAICS Codes: 2879/325320
Avg. Total Flow (gpd): ??? Avg. Process Flow (gpd): 4,700 batched/month

Industry visited during audit: YES

Comments: Subpart C - Pesticide Chemicals Formulating and Packaging

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

Industry visited during audit: YES

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	
2. Is the user subject to categorical pretreatment standards?	✓	✓	✓	✓	
a. New source or existing source (NS or ES)?	ES	ES	ES	ES	
b. Is this IU one identified as having P^2 potential?	1	1	1	1	

B. Control Mechanism

1. Does the file contain an application for a control mechanism?	✓	✓	✓	✓	
If yes, what is the application date?	12/11	3/12	11/08	3/10	
Does it ask for Pollution Prevention information?	no	no	no	no	
2. Does the file contain a Permit?	✓	✓	✓	✓	
Permit Expiration Date?	2/17	3/17	12/13	4/15	
Is a fact sheet included?	2	2	2	2	
3. Has the SIU been issued a control mechanism containing: *[See attach. A-1 for example]*					
[403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	✓	✓	✓	✓	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	3&4	3&4	3&4	3&4	
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	
f. Sampling frequency?	✓	✓	✓	✓	
g. Sampling locations?	✓	✓	✓	✓	
h. Requirement for flow monitoring?	✓	✓	✓	✓	
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	
j. Applicable IU reporting requirements?	✓	✓	✓	✓	
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	

Comments: 1) Not determined; no documentation; 2) See Attachment A-2 for example. City needs to include the statement of basis for permit limits; 3) City does all sampling for its IUs; 4) IUs' permits have an "O&G" limit. If the City is more concerned about hydrocarbon based oils it should specify a TPH limit instead.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
Records retention?	✓	✓	✓	✓	
Civil and Criminal Penalty provisions?	✓	✓	✓	✓	
Revocation of permit?	✓	✓	✓	✓	
l. Compliance schedules/ progress reports	n/a	n/a	n/a	n/a	
m. General/Specific Prohibitions?	no	no	no	no	
n. Where technologically and economically achievable, are P^2 aspect included?	1	1	1	1	
C. Application of Standards					
1. Has the IU been properly categorized?	✓	✓	✓	✓	
2. Were both Categorical Standards and Local Limits properly applied?	✓	✓	✓	✓	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	n/a	n/a	n/a	n/a	
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	n/a	n/a	n/a	n/a	
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	n/a	n/a	n/a	n/a	
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	
D. Compliance Monitoring					
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	

Comments:1) IU permits require the permittee to conduct a P2 assessment and submit the results to the City's Pretreatment Coordinator within 1 year of the effective date of permit (see Sec. D.1. on Attch. A-1e). None could be produced.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
3. Does the sampling report(s) include: [403.8(f)(2)(vi)] *(See Attachment A-3 for example)*					
a. Name of sampling personnel?	✓	✓	✓	✓	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	1	1	1	1	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	2	✓	✓	n/a	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	✓	✓	✓	✓	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	
Inspections *(see Attch. A-4 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	7/12	2/13	2/13	5/12	
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	n/a	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	3	3	3	3	
f. Evaluation of pretreatment facilities?	4	4	4	4	

Comments: 1) These four (4) IUs batch discharge. Batch holding tanks have gallons marked at 1,000, 1,500, etc for measuring process flow batch discharges, but the sampling reports do not include the volumes; 2) IU still pays for the City to conduct TTO monitoring twice/yr; 3) Brief and very general narrative only. Could be more descriptive or reference "process description in IU's file"; 4) IUs requiring a pretreatment system also had a vague description of the pretreatment process. These need to be more descriptive with a comment on the O&M condition of the equipment, etc.

SECTION III: INDUSTRIAL USER FILE REVIEW

		FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
g.	Evaluation of self-monitoring equipment and techniques?	n/a	n/a	n/a	n/a	
h.	~~(Re)~~-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	✓	✓	✓	✓	
i.	Manufacturing facilities?	1	1	1	1	
j.	Chemical handling and storage procedures?	no	no	no	no	
k.	Chemical spill prevention areas?	1	1	1	1	
l.	Hazardous waste storage areas and handling procedures?	n/a	1	1	n/a	
m.	Sampling procedures?	n/a	n/a	n/a	n/a	
n.	Laboratory procedures?	n/a	n/a	n/a	n/a	
o.	Monitoring records?	n/a	n/a	n/a	n/a	
p.	Evaluation of Pollution Prevention opportunities?	1	1	1	1	
q.	Control Authority inspector signature?	✓	✓	✓	✓	
IU Self-Monitoring and Reporting						
10.	Does the file contain self-monitoring reports?	n/a	n/a	n/a	n/a	
11.	Does the file include:					
a.	BMR?	Archived	"	"	"	
b.	90-Day Report?	"	"	"	"	
c.	All periodic reports?	n/a	n/a	n/a	n/a	
d.	Compliance schedule reports?	n/a	n/a	n/a	n/a	
12.	Did the IU report on all required parameters?	n/a	n/a	n/a	n/a	
13.	Did the IU comply with the required sampling frequency(s)?	n/a	n/a	n/a	n/a	
14.	Did the IU report flow?	n/a	n/a	n/a	n/a	
15.	Did the IU comply with the required reporting frequency(s)?	n/a	n/a	n/a	n/a	
16.	For all SIUs, are self-monitoring reports signed and certified?	n/a	n/a	n/a	n/a	
17.	Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	

Comments: 1) As mentioned on the previous page, vague and very brief descriptions were found on inspection forms regarding these various aspects. City rep. should complete one comprehensive IU inspection/IU and use it to update it on subsequent inspections.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
18. Has the IU developed a Slug Control and Prevention Plan?	1	1	1	1	
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	
If yes, does the file contain documentation regarding: a. Did the spill cause Pass Through or Interference?	n/a	n/a	n/a	n/a	
b. Did POTW respond to the spill?	n/a	n/a	n/a	n/a	

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	n/a	n/a	✓	n/a	
b. IU self-monitoring results?	n/a	n/a	n/a	n/a	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	n/a	n/a	n/a	n/a	
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	2	0	
3. Did the Control Authority notify the IU within 24 hours of becoming aware of the violation(s)?	n/a	n/a	✓	n/a	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	n/a	2	n/a	
5. Were all nondischarge violations identified in the file?	3	3	3	3	
6. Was the IU notified of all violations?	no	no	2 no	no	
7. Was follow-up enforcement action taken by the Control Authority?	no	no	no	no	
8. Did the Control Authority follow its approved ERP?	no	no	no	no	

Comments: 1) IUs have developed a SPCC/Slug control plan even though the City determined they didn't have the potential; 2) As of audit time, it hadn't been 30 days, but City rep indicated notification was "in the works"; 3) IUs have not submitted their P2 assessments and City has not taken any enforcement action.

SECTION III: INDUSTRIAL USER FILE REVIEW

Enforcement (continued)

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

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Blytheville NPDES #: AR0022560

Date of Audit: 5/21 - 5/23/13 Date entered into ICIS: 6/11/13

(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Blytheville NPDES#: AR0022560

Name, address and phone number of industry:
Siemens , 101 Terra Road, 870.762.1905
Type of industry: Metal Finishing (Ni & Cr Plating)
Date/Time of visit: 5/22/13 / 1:00 p.m.
Machinery/equip. repair/cleaning/Electroplating for local steel mills equipment
Industry contacts: Josh Callis/EHS Specialist & Chris Sutton/Plant Superintendent

		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 has not substantially changed processes since the Audit 3 years ago. Siemens (used to be Steel Related Technologies [SRT]) conducts Ni & Cr plating on selected parts that are cleaned for the iron and steel mills in the area. While Ni or chrome plating is being conducted the heavy steel industry caster segments (huge iron curved bearing systems) they are cleaned with high pressure (2500 psi) hot water. Any solvents used in cleaning of the bearings are in self contained areas and are hauled off-site. It appeared the existing schematics were not up to date and the IU will have to provide the city with the most current and accurate drawings. The rollers are steel shot blasted prior to chrome plating. Facility chrome plates the steel mills' long rollers which are about 18' long X ~2.5' diam. (the actual steel contact part of the roller is shorter). The rollers are placed in a rinse tank first to clean them of oils and dirt (with "isoprep", possibly NAOH) for plating. This rinse water is sent directly to the city and has its own outfall and permit limits. Once the rollers are plated (to 2 tenths of a 1000th of an inch), they are placed in the cleaned caster segments and sent back to the steel mills for pressing steel into flat sheets. The chrome plating "tank" is a long cylindrical "housing" which stands upright extending down into the floor (15' deep). Any rinse water from this process is allowed to drip back into the chrome plating "tank". This process has a 10' deep containment "hole" beneath it and a containment sump around it to contain any spills or leakages. Both are coated with fiberglass and a concrete sealer to eliminate leakage underground.

Visit conducted by: Gilliam/Yankee Date: 5/22/13

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: Siemens

Additional comments: The Ni plating ops were comprised of an "activator" rinse (10% sulfuric & 4% Hydrogen Peroxide), 3 separate slightly heated Ni plating tanks: post Ni plate, sulfamic Ni plate followed by a final Ni plate bath (all w/wetting agents). Plating occurs at ~0.001"/hr for a total of 20 thousandths of an inch plate. It takes about 2 days for this process on the "caster molds". Ni plating wastewater is hand pumped in a batch as needed to a holding tank and pretreated by chemically precipitation with polymers(?). The IU samples for compliance before notifying city they're ready to dump. A filter press is in use as well as De-I water rinse (City water has too much calcium in it). The filter press w.w. is routed back to the treatment system as necessary. The filter cake is reclaimed because of its high Ni content. The entire plating line is in a pit for secondary containment, fiberglass "lined" (coated) and has a sump for any spillage to be contained and pumped to pretreatment. The Ni plating process uses two pumps with filtration for agitation. Current sampling for this plating line is at the final holding tank (~2,500 gallons batch discharged/quarter). Every tank has an alarm with it. This auditor would deem there's a very small chance for a slug load to the City.

The IU is currently testing its newly installed Cu plating tank. This Cu plating is for their anodes in the Ni plating ops. There will be no discharge from this small (~4.5' wide X ~4.5' length X ~3.5' deep) Cu plating tank. It is continually filtered through 2 upright cylinders which contain a number of cartridge filters in them to remove impurities. The Cu plating of the anodes will save the company money by not having to buy them from an outside source. There will be no w.w. discharged from this operation. Other wastewater generated at the facility is from the pressure testing of the bearings' cooling nozzles and the steam wash area where the floor is sloped via floor drains where it gravity flows through 3 separate in-ground basic clarifiers (settling tanks), each with a weir system for oil removal. Wastewater is then pumped into three additional outside final clarifiers (pits) prior to discharge to the city. Some basic machining is performed at 7 self-contained CNC stations and scrap metal is hauled off-site for recycle.

The three (3) sampling points and schematic of their various wastewater streams needs to be revised by the facility and submitted (and dated) to the City. This was discussed during the site visit.

The facility is ISO certified in 14001 (environmental), 18001 (safety) and 9001 (quality).

City rep. was familiar with the facility's ops and the facility reps were clear about their permit limits.

Visit conducted by: Gilliam/Yankee Date: 5/22/13

(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 Appliance Corp., 300 Industrial Dr., 870.763.3652

Type of industry: Metal Finisher Date/Time of visit: 5/22/13; 8:30 a.m.

Contacts: Donald Lesley - Engineer, Doug Atkins - Paint Supv., Chuck Bates - Maintenance 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: Facility hasn't changed operations substantially from the previous audit about three years ago.

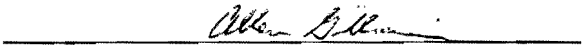
Facility manufactures the Al or cold rolled steel (~50/50) enclosures and assembles assorted sizes of battery chargers. Most of the operations include stamping (holes), "breaking", milling, cutting and machining of the enclosures prior to powder coating and assembly of various parts for the finished product. There is no wastewater generated in this area.

Aluminum workpieces are not sent thru the phosphatizing operation.

Facility rep indicated battery chargers are evolving from transformers into much smaller circuit boards.

Facility produces about 75 units/day depending on size and configuration.

Visit conducted by: Gilliam/Yankee Date: 5/22/13



(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 Appliance

Additional Comments: Some parts come in plastic coated.
Wastewater operations which fall under CFR 433 (metal finishing) is only the Fe phosphatizing which consist of 2 very basic spray booths. The first stage contains the Fe phosphate (850 gallons) followed by a fresh city water rinse (450 gallons). Facility rep calls the city when they're ready to batch discharge. pH of the phosphate tank runs near 3.5 s.u.
Spray nozzles are "cleaned" by drilling the nozzle holes out. IU rep indicated they're hesitant to descale the whole unit it is so old and interior rusted. Their was evidence of this on the outside of the phosphatizing unit where paint was peeling in spots and rusting in various areas, but leakages were not evident.
After the "cleaning" stage, parts are sent through a dry-off oven and then thru the electrostatic paint booth then into the "bake" oven (~400° F). They switched to powder coat back in '95 or '96. This powder coat booth is very small (~12' long X ~6' wide X 7.5' tall) with the powder coat applied by hand spraying guns. No solvent to clean those was seen near this area.
Permit limits are straight out of CFR 433 which the facility reps understood.
Assembly area takes up the bulk of the area of the building. Area appeared clean with no obvious wastewater, chemical leakages nor floor drains.
Boxes are formed, punched and machined prior to going to cleaning process.
Very little chemical storage near that area.
Chemicals are brought in on pallets via fork lifts.
No slug potential observed by this auditor.
Sampling point is directly out of the phosphatizing tank while both it and the rinse water tank is batch discharged. This auditor pointed out to the City rep the rinse water is not being sampled when they batch discharge; therefore, not being taken into account in assessing compliance. The IU has had no problems meeting the CFR 433 limits anyway. No pretreatment is necessary to meet them.

Visit conducted by: Gilliam/Yankee Date: 5/22/13

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 (Regal Beloit), 4025 E. Highway 18, 870.776.1297

Type of industry: CFR's 433 & 464 Date/Time of visit: 5/22/13; 9:50 a.m.

Manufacturer of electric motors Contacts: Amberly Nichols & Larry Bivens

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

Additional comments: IU has not changed operations substantially since the audit conducted about 3 years ago. Facility manufacturers the rotors/cores for medium to large sized electric motors (40 to 680 hp). Ms. Nichols had not been on the job but for about 3 months and was not completely familiar with all the processes/chemical usage in the plant. Very little Al is poured/day. Process begins with numerous wafer thin steel core laminations being injected with semi-molten aluminum. This process does not "fit" the traditional aluminum die casting operations (under CFR 464) as there are no molds nor dies and aluminum is basically pressured into the wafers' voids to fill the rotor cores. The "casting" stations have non-contact cooling water jackets with no process wastewater associated.
Any hydraulic leakages are contained/absorbed and shipped off-site.

Visit conducted by: Gilliam/Yankee Date: 5/22/13

(signature of auditor conducting visit)

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

Control Authority: City of Blytheville NPDES #: AR0022560

Industry name: Motor Technologies

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

The cores are further air cooled and again heated prior so a steel shaft can be pressed through it. They're once again sent through a 300 gallon quench tank. Motor housing assemblies (end caps and main housing) are then sent through a 5 stage phosphatizing operation (dip tanks, not spray booths): alkaline wash, water rinsed, iron phosphatized, water rinsed, then followed by a reverse osmosis water rinse. Most rinses are counter current flowed. Each of these 5 tanks hold about ~1900 gallons. To guard against any accidental discharges from these tanks the gate valves under each have been "locked-out/tagged out" with only specific personnel having access to the keys.

The R/O and the second rinse are continually overflowing but the other 3 tanks are batch discharged ~once/quarter.

Motor housing assemblies are sent through a self-contained primer dip and paint tank followed by a final bake off oven. The one floor drain in the paint area had been sealed.

Remaining operations include copper winding, two types of varnish are applied and then final assembly.

Chemical storage areas (barrels) as well as how the various chems were transferred from one station to another was discussed. Barrel dollies were seen as one means of chemical handling.

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

Visit conducted by: Gilliam/Yankee Date: 5/22/13

(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:
WinField Solutions (Omnium), 400 Terra Road, 870.763.2022
Type of industry: Pesticide formulator and packager
CFR 455, Subpart C

Date/Time of visit:
5/23/13/ 9:15 a.m.

Industry contacts: Paul Vickerson - Plant Manager

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

*Category allows for a P2 Alternative

Additional comments:
Facility has not substantially changed operations since the audit conducted about 10 yrs ago. Facility is still blending outside customer compounds for pesticides, mainly a herbicide (dry flowables [DF]) and a fungicide (liquid) and some urease inhibitor (helps keep the consumers' urea from evaporating/volatilizing) at this time. Facility rep indicated they were following the Pollution Prevention Alternative (PPA) as allowed under their Category - Pesticide Chemicals Formulating and Packaging under 40 CFR 455, Table 8 (minimize pesticide active ingredients [PAI] change over schedules, re-use of washdown waters back into same product, high pressure-low volume washdowns, e.g.). When changing PAIs, the dry flowables are first cleaned by thorough sweeping to return the customers' material back into the product. Process lines are then "snaked" (mechanical cleaning) and the vessels hand-power pressure washed (city water). This begins at the top of each of their two active process "towers" (over 4 stories tall) which has mixers, blenders, air mills and other equipment all throughout the process.

Visit conducted by: Gilliam/Yankee Date: 5/23/13

(signature of auditor conducting visit)

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

Control Authority: City of Blytheville NPDES #: AR0022560

Industry name: WinField (Omnium)

Additional comments: Washwaters (including mop water) are squeegeed into a sump hole. Each room's doors have a rubber curbing or sand bags to keep this washwater contained on each floor to keep it from reaching the warehouse area. Employees will put a suction hose in each sump and use a diaphragm pump to pump this w.w. to one of the storage tanks. The facility has two (2) 30,000 gallon (working capacity) horizontal holding tanks designated for this wastewater where some settling occurs. These tanks sit down in a below grade (~2' lower) concrete containment area (no floor drains or valves) to contain any leaks. Four other 30,000 gallon tanks are in this same containment area, two of which contain a customer's liquid product and the other two are empty at this time. Recently they've added a roll-off container ("box") which has a cloth filter to capture mainly clays and filler material before the wastewater reaches one of the two storage tanks. The roll-off box with the cloth filter has helped reduce the sludge build-up in the storage tanks.

[Sludge is sent to a secure landfill as non-haz waste. Some of their customers want to ensure their sludge waste is accounted for and treated as haz waste, i.e. - "cradle to grave". Facility rep indicated some of their customers insist incineration of all waste material including any boxes or containers that might show their company logo.]

Decant from either of the 30,000 gallon wastewater tanks is sent to a 5,500 gallon poly treatment tank where chemicals are added to facilitate the settling of solids. A jar test is set up first to determine proper percentages of "mid-floc" (anionic and cationic polymers) to help remove as many solids as they can. Wastewater is decanted back off the treatment tank and sent through a sand filter and then through a carbon filter (technology prescribed in EPA's Development Document for these type organics) and then into a 5,500 gallon poly holding tank. Sodium hydroxide is added as necessary for neutralization and then is tested for their PAIs prior to discharge to the city.

Even though the facility has two (2) dry flowable plants and two (2) liquid plants, the only wastewater generated, treated and sent to the City is the washdown water. No wastewater is generated as part of either of the two dry or liquid processes. Discharge to the City is on a batch discharge basis of about 4,700 gallons/month.

The dry flowable PAIs are changed out about once/yr after which the washdown occurs.

The facility's permit was co-written by this office and the company representative with counsel from the EPA effluent guidelines group. Facility rep was very transparent in his discussion of their ops and the City rep was familiar with the IU's processes and pretreatment.

Visit conducted by: Gilliam/Yankee Date: 5/23/13

Allen Gilliam

(signature of auditor conducting visit)

Attachment A1

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 ***Pretreatment Program Regulations in Ordinance # 1594 and 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 31, 2012*** and authorization to discharge shall expire at midnight on ***FEBRUARY 1, 2017***. 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 31st day of January, 2012.

Approved By: Janet Mankin

Pretreatment Coordinator

TABLE OF CONTENTS

MACPermit

PART I - SPECIFIC CONDITIONS, LIMITATIONS, AND REQUIREMENTS

SECTION A. WASTESTREAM LOCATIONS

Location 001

The wastewater from the metal finishing process tank flows directly to Location 001. Location 001 shall be a clean-out that is located outside approximately five feet from the south 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

	LIMITATIONS[1]				MONITORING REQUIREMENTS	
Parameter	**Daily Maximum**		**Monthly Average**		**Frequency[2]**	**Sample Type**
	(mg/l)	(lb/day)	(mg/l)	(lb/day)		
Mercury	.00005				2-times/annually	Grab
Cadmium, total	0.11		0.07		2-times/annually	Grab
Chromium, total	2.77		1.71		2-times/annually	Grab
Copper, total	3.38		2.07		2-times/annually	Grab
Lead, total	0.69		0.43		2-times/annually	Grab
Nickel, total	3.98		2.38		2-times/annually	Grab
Silver, total	0.43		0.24		2-times/annually	Grab
Zinc, total	2.61		1.48		2-times/annually	Grab
Cyanide, total[3]	1.20		0.65		2-times/annually	Grab
Oil & Grease	100	-	-	-	2-times/annually	Grab
TTO, 40 CFR 433	2.13 mg/l		Report		2-times/annually	Grab
T.S.S.	300		-		2-times/annually	Grab

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

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

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

SECTION C. COMPLIANCE SCHEDULE

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

SECTION D. OTHER SPECIFIC REQUIREMENTS

1. Pollution Prevention

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

PART II - STANDARD MONITORING, RECORD KEEPING & REPORTING REQUIREMENTS

SECTION A. MONITORING

1. Monitoring by Approved Methods

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

If the Permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the industrial monitoring reports.

2. Sampling Facility and Monitoring Equipment

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

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

Such facility(s) and other appurtenances shall be maintained to be safe and accessible at all

times and shall be made available for use by the Industrial Pretreatment Coordinator for monitoring and/or sampling upon request.

3. Representative Sampling

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

4. 24-Hour Reporting and Automatic Resampling

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

The IPC may waive the resampling requirement if the IPC performs sampling at the Permittee at least once per month, or the IPC performs sampling at the Permittee between the time when the Permittee performs its initial sampling and the time when the Permittee receives the results of this sampling.

5. Flow Measurement Devices and Method

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

SECTION B. RECORD KEEPING

1. Retention of Records

The Permittee shall retain records of all monitoring information resulting from monitoring activities, including all calibration and maintenance records, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, or application. This period may be extended by request of the Industrial Pretreatment

Coordinator at any time.

All records which pertain to matters which are the subject of enforcement or litigation activities pursuant hereto shall be retained and preserved by the Permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

2. Record Contents

Records and monitoring information shall include:

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

3. Manifest of Wastes Removed

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

4. Duty to Provide Information

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

5. Availability of Data

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

SECTION C. REPORTING

1. Discharge Monitoring Report

No later than the 21st day of each month the Permittee shall provide the Industrial

Pretreatment Coordinator (IPC) with a summary report of pollutant discharges for the previous calendar month. The report shall include:

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

2. Compliance Schedule Reporting

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

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

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

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

3. Averaging Measurements and Detection Limits

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

4. Notification of Unusual Loadings

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

5. Planned Changes

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

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

6. Notification of Shutdown

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

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

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

7. Anticipated Noncompliance

The Permittee shall submit prior notice to the Industrial Pretreatment Coordinator, if possible at least 30 days before to any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

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

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

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

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

9. Other Noncompliance

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

10. Certification in Lieu of Monitoring

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

11. Signatory Requirements

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

Pretreatment Coordinator for any individual to be considered an authorized signatory. See Attachment A for the definition of an authorized signatory.

Any authorized signatory signing reports or information submitted in accordance with this permit shall make the following written certification:

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

12. Address for Report Submissions

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

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

(870) 763-4961

PART III - STANDARD CONDITIONS

SECTION A. GENERAL CONDITIONS

1. State Laws

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

2. Limitations Subject To Revision

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

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

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

3. Property Rights

This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

4. Regulatory Changes

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

5. Toxic Pollutants

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

6. **Severability**

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

7. **Permit Modification, Revocation, Suspension, Termination**

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

8. **Permit Transfer**

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

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

9. **Duty to Reapply**

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

10. **Continuation of Expired Permits**

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

SECTION B. OPERATION AND MAINTENANCE

1. **Proper Operation and Maintenance**

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

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

2. Need to Halt or Reduce Not a Defense

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

3. Duty to Mitigate

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

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

4. Bypass of Treatment System

Bypass of the treatment system is prohibited, unless:

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

5. Affirmative Defense

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

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

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

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

6. Removed Substances and RCRA Requirements

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

7. Disposal of Sludges and Spent Chemicals

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

8. Emergency Action

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

9. Dilution Not Permitted

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

SECTION C. RESULTS OF NONCOMPLIANCE

1. Duty to Comply

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

2. Penalties for Violations of Permit Conditions

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

3. Permit Suspension, Revocation and Termination

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

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

4. Tampering

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

5. Falsification of Reports

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

6. Publication in Newspaper for Significant Noncompliance

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

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

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

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

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

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

completing construction, or attaining final compliance;

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

g. Failure to accurately report noncompliance;

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

7. Civil and Criminal Liability

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

PART IV - OTHER REQUIREMENTS

SECTION A. RIGHT OF ENTRY

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

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

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

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

SECTION B. BOILER SYSTEM

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

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

SECTION C. ACCIDENTAL SPILL/SLUG PREVENTION PLAN

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

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

As a minimum, the ASPP must address the following:

1. Chemical storage areas;

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

For each of the above categories, describe:

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

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

PART V - DEFINITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

dischargers to the treatment plant.

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

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

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

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

ATTACHMENT A - SIGNATORY AUTHORIZATION

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

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

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

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

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

Authorization Revoked by:

_____ Signature of a Current Authorized Signatory	_____ Date Revoked

Attachment A-2

Industrial User Fact Sheet

Name & Address of I.U.	Siemens Industry, Inc. 4313 E. State Hwy. 18 101 Terra Road Blytheville, AR. 72315
Phone Number	(870) 762-1906
Type of I.U.	Machinery & Equipment Repair/Cleaning/Ni & Cr Plating for Steel Mill Ind.
Contacts	Josh Callis-Safety Mgr. Lendall Yeater-Ni Plating Supv. Chris Sutton-Cr Plating Supv.

Industry is classified as a Categorical User under 40 CFR 403 regulations with SIC # 7692, 3471. NAICS- 333319 & 332813.

Industrial User Discharge Permit # 13 (expires December 31, 2013)

Siemens Industry (formally Steel Related Technologies) conducts nickel & chrome plating on selected parts that are cleaned for the steel mill industry. The steel industry caster segments and rolls (large bearing systems) are cleaned with a high pressure cleaner with solvents prior to any plating. These wash waters are contained in the wash area and solids are hauled off site. The wastewater flows through a series (3) of settling tanks before discharge.

The nickel plating process is housed in 3 separate tanks that are heated. These are contained in a fiberglass pit. The nickel plating wastewater is pumped to a batch tank as needed to a holding tank where it is pretreated and sampled before notifying the city before discharge. This facility also has a filter press to remove solids for disposal.

The chrome plating process uses a long cylindrical tank standing up-right for the plating process. Rinse waters are pumped back to the pretreatment tank. This also has a wet fume scrubber with an evaporator to remove excess water.

This facility has 3 outfalls - # 001 high pressure wash/cleaning of machinery

002 nickel plating

003 chrome plating

Siemens Industry, Inc. must certify semi-annually on its Total Toxic Organics. (June & December)

Hazardous waste is stored and properly disposed of from this facility.

This facility has very little potential for a spill/slug discharge.

Attachment A-3

ETC
www.etcmemphis.com

ENVIRONMENTAL TESTING & CONSULTING, INC.
2790 Whitten Road Memphis, Tennessee 38133 (901) 213-2400 Fax (901) 213-2440

CHAIN OF CUSTODY

COC Number / Kit ID

0000013299

Company Name	Customer Number	Telephone	RUSH	ICE
Blytheville Sewer Department	03316	870-780-5886		X

Site Name	Project Comment	FID Number
Motor Appliance	Removed Mercury Test	

Project	Project Number	PO Number
Blytheville - Motor Appliance	motor Appliance	

Project Manager / Contact	E-mail
Mr. James Yankee	jlyankee72315@yahoo.com

Sample ID	Container Type	Collected Date / Time	# Cont	Preservative	Grab / Comp	Matrix	Analyses
Wastewater	Glass Vial Amber - 40ml	7-9-12 8:00 am	3	HCL - Hydrochloric Acid	G	Aqueous	VOC
Wastewater	Glass Amber - Liter	7-9-12 8:00 am	2	Na2S2O3 - Sodium Thiosulfate	G	Aqueous	SVOC/PCB
Wastewater	Plastic - Pint	7-9-12 8:00 Am	1	NONE	G	Aqueous	TSS
Wastewater	Plastic - Pint	7-9-12 8:00 am	1	HNO3 - Nitric Acid	G	Aqueous	Ag/Cd/Cr/Cu/Pb/Ni/Zn
Wastewater	Plastic - Pint	7-9-12 8:00 Am	1	NaOH - Sodium Hydroxide	G	Aqueous	Cyanide
Wastewater	Glass Clear - Quart	7-9-12 8:00 Am	1	HCL - Hydrochloric Acid	G	Aqueous	Oil & Grease
~~Wastewater~~	~~Glass - Low Level Hg~~		1	~~HCL - Hydrochloric Acid~~	~~G~~	~~Aqueous~~	~~Lt Hg~~
~~Field Blank~~	~~Glass - Low Level Hg~~		1	~~HCL - Hydrochloric Acid~~	~~G~~	~~Aqueous~~	~~Lt Hg~~

Sampled By	Method of Shipment	Blank / Cooler Temperature	Remarks
James Yankee	ETC LAB		

Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time
James Yankee	7/10/12 1115		7/10/12 1115
~~Relinquished By (sign)~~	Date / Time	Received By (sign)	Date / Time
Relinquished By (sign)	Date / Time	Received by Lab (sign)	Date / Time
	7/10/12		7/10/12

SAMPLING RECORD

FACILITY SAMPLED Motor Appliance Corp **DATE &TIME** 3/12/13 9am

SAMPLING BOTTLE ID# _____

FACILITY SAMPLING LOCATION: Clean-out on South side of building & wash tank inside building

SAMPLE TYPE: **GRAB** (✓) **COMPOSITE** (✓) **#HOURS** (24)

REASON FOR SAMPLING: **SCHEDULED** ( ) **OTHER:** _____

VISIT WAS: **ANNOUNCED** ( ) **UNANNOUNCED** (✓)

COMMENTS/OBSERVATIONS: Plant looks clean & product was running

PRESERVATION NOTES: Sample kit from ETC Labs with appropiate preservatives

SAMPLE SPLIT WITH FACILITY: **YES** ( ) **NO** (✓)

NAME OF FACILITY REPRESENTATIVE: Doug Atkins

TITLE OF FACILITY REPRESENTATIVE: Operator

WAS REPRESENTATIVE PRESENT: **YES** (✓) **NO** ( )

SAMPLE COLLECTED BY: James Yankee

A-3b

Attachment A-4

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

INSPECTORS NAME(S) James Yankee **DATE:** 7/2/12 **TIME:** 1:45 pm

NAME OF FACILITY: *MOTOR APPLIANCE CORPORATION*

MAILING ADDRESS: *300 Industrial Drive*

PHYSICAL ADDRESS: *4872 NCR 779*

PHONE NO: *763-3652* **OTHER:**

CONTACT PERSON: *STEVE SMITH* **TITLE:** *PLANT MANAGER*

Willie Ames **TITLE:** Operator

DOUG ATKINS **TITLE:** *OPERATOR*

SIC NO: *3421* **NAICS NO:** *332813* **WW PERMIT NO:** *10* **EXPIRATION DATE:** *12/31/2011*

OTHER PERMITS: N/A

DESCRIPTION OF PROCESSES: *Manufactures Battery Chargers*

FLOWS: *820* **CONTINUOUS?** **BATCH?** *YES* *6-annually*

PRODUCTION RATES: *N/A*

POLLUTION PREVENTION ALTERNATIVES: N/A plant is clean

BEST MANAGEMENT PRACTICES:

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

HAZARDOUS WASTE: in barrels - very little accumulation

STORAGE:

TOXIC ORGANIC MANAGEMENT PLAN: N/A

TTO CERTIFICATION? *Currently working on certification*

DISCHARGE PARAMETERS: *Chromium, Copper, Lead, Nickel, Zinc, pH, TSS*

MONITORING FREQUENCY: twice per year

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

CHANGES SINCE LAST INSPECTION: None — Manufacturing is slow

REPS. SIGNATURE: [signature] **DATE:** 7/2/2012

INSPECTORS SIGNATURE: [signature] **DATE:** 7/2/2012