ADEQ

ARKANSAS
Department of Environmental Quality

NPDES PERMIT FILE
NPDES # AR0034321
AFIN # 05-00054
Permit PN
✓ Correspondence
Technical Backup
9/16/08 MH Date Scanned

September 5, 2008

Frank Gelinas
Director of Public Works
City of Harrison
P.O. Box 1715
Harrison, Arkansas 72602

Re: City of Harrison (NPDES #AR0034321; AFIN #05-00054) Pretreatment Program Audit / Municipal Pollution Prevention (P2) Assessment

Dear Mr. Gelinas:

Please find enclosed the finished report for the audit/assessment conducted June 17th through the 19th, 2008. The report with required actions and recommendations should be made available for review and discussions by appropriate City officials. Please respond in writing within 30 days with proposed corrective actions.

Harrison appears to have a Pretreatment Coordinator interested in the Program and its implementation. With a few administrative deficiencies, he seems to be maintaining it efficiently. Mr. Maples' recent public outreach attempts regarding P2 and emerging pollutants of concern should be commended.

However, in this office's opinion, more P2 activities could be integrated into your Program. Most of the audit/assessment recommendations are meant to help your Program further evolve in this direction. It's felt Harrison is at a point with its Pretreatment Program to engage a fully sustained P2 Program. This auditor witnessed P2 activities at the City's industrial users during the site visits, indicating their willingness to explore and implement cost saving P2 practices.

It was a pleasure working with your staff during this event and becoming more familiar with Harrison, its industries and Pretreatment Program.

Feel free to contact this office with any questions.

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist/Attachments

cc: Rudy Molina/EPA 6WQ-PO (via e-mail)

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF HARRISON, ARKANSAS

NPDES PERMIT #AR0034321

September 5, 2008

PREPARED BY:

Allen Gilliam

ADEQ State Pretreatment Coordinator

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LIST OF ATTACHMENTS

A) INTRODUCTION

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy. With Pollution Prevention (P2) being integrated into Pretreatment Programs assessments of cities' P2 projects and programs will be made in conjunction with the audits.

An audit/assessment was performed June 17 through June 19, 2008, of the Pretreatment Program implemented by City of Harrison, Arkansas. Participants included:

Allen Gilliam	ADEQ / Pretreatment Coordinator
Rick Maples	City of Harrison / Pretreatment Coordinator

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Harrison'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.

Harrison's Pretreatment Program was originally approved 5/16/88. The program was modified, reviewed and approved on 8/6/98. Modifications included incorporation of an enforcement response plan, revisions to the pretreatment ordinance and a headworks loading evaluation indicating local limits were not necessary at the time.

The Program is presently not current with 40 CFR 403. A draft Pretreatment Ordinance was handed this auditor during this audit. The City Coordinator was asked to review the rest of the Program to ensure it was also consistent with 40 CFR 403 and their draft Ordinance. A review of the draft Ordinance has not been fully completed at this time.

The City's POTW consists of a parallel bar screen; primary clarification; aeration basins (oxidation ditch); secondary clarification; chlorination/de-chlorination and re-aerated via cascade steps before discharge to Crooked Creek. Its design flow is 2.6 MGD but averages about 1.8 MGD. There's been no pattern of toxicity recently shown.

The plant's receives approximately 0.036 MGD from five (5) significant categorical industries with one (1) possibly shutting down categorical operations. Sludge is thickened, chemical conditioned with ferric chloride and vacuum dewatered before being land applied. Estimated application rate is 634 dry metric tons/yr.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to four (4) of their significant 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 as 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. 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 Harrison's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1) Under ***40 CFR 403.6(d)*** "Dilution prohibited as substitute for treatment..." is a specific prohibition.

While the City sent a permit "Addendum" to its SIUs per an ADEQ inspector's findings (see Attach. A-6), this prohibition should also be specifically cited in the permits.

2) Under ***CFR 403.12(b(3)*** "Reporting requirements for industrial users upon effective date of categorical pretreatment standard—baseline report...Description of operations. The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes."

During the file reviews and site visits, it was discovered not all facility schematics process descriptions were current. The City must require its permitted industries to keep these documents updated.

While the City's fact sheets appeared comprehensive, these should be sent to every industry representative to update (denoting the revision date somewhere on the documents). This would have reduced the confusion at the Claridge facility's site visit as there were two (2) different schematics on file. And, Claridge has since built a separate pretreatment building with more efficient pretreatment, abandoning the settling ponds they once used which was not mentioned in the fact sheet. Permit limits still included dilution from rain events which is not now the case.

3) Under ***40 CFR 403.8(f)(1)(B)(4)*** "...individual...control mechanisms must be enforceable and contain, at a minimum, the following conditions: Self-monitoring, sampling, reporting, notification and recordkeeping requirements..."

During the file review, it was discovered sampling types were described as "24 hr composites" (see item #4 on Attach. A-4e). With most of the City's SIUs batch discharging, 24 hr composites are not realistic. Revise the language in the appropriate SIU permits to reflect "grab sampling when composites are not feasible" or place another column on the second page of all SIU permits with "Sample Type" describing what type samples should be taken under the different SIU circumstances.

4) Under ***40 CFR 403.5(b)(8)*** "Specific prohibitions. In addition, the following pollutants shall not be introduced into a POTW: Any trucked or hauled pollutants, except at discharge points designated by the POTW."

While the City does have an "agreement" (see Attach. A-1) with its trucked waste haulers, the agreement must contain language specifying the exact location at the POTW where they are allowed to dump their wastes. The general and specific prohibitions in ***40 CFR 403.5 (a) & (b)*** should also be included in their agreements.

5) Under ***40 CFR 403.6(e)*** "Combined wastestream formula. Where process effluent is mixed prior to treatment with wastewaters other than those generated by the regulated process...

During the file reviews and site visits, it was unclear what streams constituted dilution streams. The City must confirm through comprehensive inspections and correspondence with their SIUs which streams are regulated vs. those which are dilute. Flow measurements (via meters, other verifiable devices or accurate estimates) for each should be reported accordingly so permit limits can be determined accurate.

During Pace's site visit, there seemed to be some confusion about what streams were dilute vs. regulated.

6) Under ***40 CFR 403.12(p)*** "The Industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under

40 CFR part 261..."

It was noted the City had sent out notification of this hazardous waste generators reporting requirement back in 2004. Again, the City should send out another, not only to those generators on the ADEQ list provided during the audit, but also to its dentists, hospitals, veterinarians, chiropractors, long term care facilities, X-ray clinics, pharmacies, etc.

These type businesses are not tracked by ADEQ but, typically generate and have the potential to discharge their hazardous waste to the City.

7) Under ***40 CFR 403.8(f)(2)(iii)*** "Notify Industrial Users identified under paragraph (f)(2)(i) of this section, of applicable Pretreatment Standards and..."

The City is required to notify its effected entities of the "Streamlining" revisions to CFR 403. A short cover letter with a internet "hot-link" would suffice. The City's industries should be afforded the same notice of changed regulations for their possible feedback.

8) Under ***40 CFR 433.12(a)*** "In lieu of requiring monitoring for TTO, the [City] may allow dischargers to make the following certification statement:... I further certify that this facility is implementing the toxic organic management plan [TOMP] submitted to the permitting [or control] authority..."

And, under ***40 CFR 433.12(b)*** "In requesting the certification alternative, a discharger shall submit a solvent management plan [TOMP] that specifies to the satisfaction of the [City]...the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater."

During the file review, it was not obvious when and if an approved (documented) TOMP had been submitted by the appropriate SIUs. The City must retain documentation in its files (or fact sheet) "A TOMP has been submitted on [this date] and approved by [City official]". For those the City says has submitted one, they should be sent to the appropriate SIU representative for any revisions or updates (with a revised date located somewhere on the document).

9) Under ***40 CFR 403.8(f)(2)(v)*** "Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards. Inspect and sample the effluent from each Significant Industrial User at least once a year,..."

a) It was noted during the file review, the City's inspections could be more comprehensive. Reference to their fact sheets (which are fairly comprehensive) is fine to be noted on the inspection forms but, one of the first questions to be asked should be, "Has there been any changes in processes, equipment layout, chemical substitutions, etc. since the last inspection?" This would lead to a shortened pre-inspection interview and the physical walk-through could ensue to verify other pertinent information.

b) Chemical handling questions need to be added to the inspection forms themselves.

c) The cover page of the inspection should also include a place where the City inspector and the IU representative can print, sign and date.

d) Evaluation of the SIUs' self-monitoring equipment and techniques should also be included in the inspection forms.

e) Independent validation of flows and production must also be documented during inspections.

10) Under ***40 CFR 403.8(f)(2)(vi)*** "Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006;..."

During the file review, it could not be ascertained whether a slug potential evaluation had actually been conducted with the conclusion documented in each SIU's file.

11) Under ***40 CFR 403.8(f)(2)(vii)*** "For the purposes of this provision, a Significant Industrial User...is in significant noncompliance (SNC) if its violation meets one or more of the following criteria:...Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH);..."

During the file review and checklist "interview", the City coordinator stated he was not using the TRC violations in his SIUs' quarterly review for SNC. The City must follow the criteria also.

12) Under ***40 CFR 403.8(f)(1)(iii)(B)(3)*** "...individual...control mechanisms must be enforceable and contain, at a minimum, the following conditions Effluent limits, including Best Management Practices, based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards..."

a) During the site visit at Duncan, the facility representative and City personnel discussed the possibility of revising, or even ceasing their permit. Duncan has discontinued their die-casting operations and is thinking of even removing their 40 CFR 433 phosphatizing process.

At this time, the City needs to permit this facility based on its current process wastewater generated and discharged to the City.

If there's some indecision at Duncan's upper management level as to removing all its federally regulated wastewater generating processes, this needs to be addressed. At this point in time, Duncan's permit does not reflect correct or defensible limits for what little wastewater this facility

is discharging.

b) And, the City needs to incorporate into its Program's Enforcement Response Plan an enforcement option for violations of Best Management Practices.

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

1) Recommend continue surveying (AND documenting) sector based non-domestic users such as machine shops, nursing homes, doctor's and dentist's offices, film processors, auto-body repair shops, etc. using custom tailored questionnaires to "fit" the right questions to the business type.

Questions regarding Pollution Prevention (P2) activities should also be included in these surveys.

2) Recommend including more P2, BMP, water and energy conservation questions on SIU permit applications.

3) Recommend establishing a P2 policy whether through a City Board resolution or written policy or modification to the Pretreatment Ordinance (see EPA's Guides to Pollution Prevention(for) Municipal Pretreatment Programs, page 10 for example resolution).

4) Send all SIUs a copy of their reporting requirements located in 40 CFR 403.12. One provision, the notification of "changed discharge" requirement is consistently "overlooked" by many IUs and control authorities throughout the State. Equipment or plumbing modifications to pretreatment/process equipment constitute such changes requiring notification in the form of updated schematics.

5) Recommend including P2 practices implementation at all permitted SIUs with annual progress reporting requirements.

6) Request and compile successful P2 stories from the City's industries. EPA's national P2 Resource Exchange system (P2RX) is currently a work in progress and success stories are being posted for other industries to explore practices and possibly duplicate.

7) Recommend including a bypass clause in all IU permits.

8) Recommend including the specific $1,000/day/violation penalty in all IU permits.

9) Recommend including the "revocation of permit" clause in all IU permits.

Even though #s **7**, **8** and **9** are included in the City's Program, these conditions should also be specified in the SIUs' permits.

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

Submit modifications to the City's Program to be current with 40 CFR 403. The Pretreatment Ordinance is not the only section of the Program that may need modification. City Pretreatment personnel need to review its entire Program to identify other sections that need to be revised.

* * * * * * * *

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 Harrison NPDES #: AR0034321
Mailing address: P.O. Box 1715, 1508 Silver Valley Road 72601

Permit Signatory: Arnold Rogers Title: Wastewater Manager

Telephone: 870.741.5527 FAX NUMBER: 870.741.5022

Pretreatment Contact: Rick Maples Title: Pretreatment Coord.
Address: Same
Telephone: 870.741.4426
e-mail hwwtp2@alltel.net

Pretreatment program approval date: 5/16/84

Dates of approval of any substantial modifications: 8/6/98

Month Annual Pretreatment Report Due: May

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 6/17-19/08 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Rick Maples	Pretreatment Coordinator	870.741.4426
Arnold Rogers	Wastewater Manager	870.741.5527

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	5/07	Not documenting TRC calculations & IU's violating permit limits are not re-sampling within 30 days?
No older PCIs could be located		

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?

. . . . . .

There's not been any substantial changes to the implementation of the City's Pretreatment Program since the last audit (5/04); therefore, not many changes to this entire checklist.

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
*AR0034321	Harrison	10/1/07	9/30/12

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Harrison
Location Address: 1508 Silver Valley Rd, 72601

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 2.6 MGD; Actual (Average)- 1.8 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 5 # of CIUs : 5
Industrial Flow (mgd): .036 Industrial Flow (%) : 1.9 %

Level of Treatment		Type of Process(es):
Primary		Comminutor; bar screen; primary
Secondary	✓	clarifiers; 2 parallel oxidation ditches;
Tertiary		final clarifiers; sludge thickner; vacuum dewatering, reaeration via cascade steps

Method of Disinfection: Chlorination

Dechlorination ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Crooked Creek then to the White River

Receiving Stream Classification: Planning Segment 4I of the White River Basin

Receiving Stream Use: Primary contact recreation/raw water source, etc.

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	634 dry metric 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; CBOD5; NH3-N, TRC

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

YES NO

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

Issuing Authority: ADEQ (not delegated)
Issuance Date: Same
Expiration Date: same

List pollutants that are specified in current sludge permit:
References 40 CFR 503

YES NO N/A

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

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) No lethality nor sub-lethality for either species since '02.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	7	
Priority **	4	4		
Biomonitoring		4	4	
TCLP			1	
Other:				

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

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.
No evaluation being done

YES NO N/A

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

___ ✓ ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated	Cause(s)
N/a	

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES	NO	
n/a		Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]
✓		Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below. During this audit, only their Ordinance mods to be current with the streamlining revisions were handed over to this auditor.

1. Modifications:

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

2. Modifications in Progress:

Date Requested	Nature of Modification
6/17/08	Ordinance mods to address changes to be current with the streamlining revisions to CFR 403.

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

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

Date of original Pretreatment Program approval: 8/6/98 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 1/5/98
Date of most recent Pretreatment Program modification approval: 8/6/98

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

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

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

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

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

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

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

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

Briefly describe other problems: _____

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

✓ ___ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) ? to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *"Ongoing with 4 sectors being surveyed currently."*

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

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

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

What methods are used to update the IWS:

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

How often is the survey to be updated? Ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: No

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?
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) [WENDB-SIUS]
b. 5 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 0 Noncategorical SIUs
d. 3 Other regulated nonsignificant IUs (Describe) *"porta-potty" hauler; septage & Waste Management, Inc. w/10,000 gal. storage tank for "garbage juice"*
8 TOTAL of a. + d.

YES NO

___ ✓ Has the POTW identified any IUs with Pollution Prevention opportunities?
✓ ___ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

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

_____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

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

What is the maximum term of the control mechanism? 5 yrs
How many SIUs are not covered by an existing, unexpired permit or other control mechanism? *None* [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

IU NAME	PERMIT EXPIRATION DATE
n/a	

YES NO

✓ ___ Does the Control Authority accept trucked septage wastes?

✓ ___ Does the Control Authority accept other trucked wastes?

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

They keep a log of when the porta potty haulers comes in & have written "agreements" with them and Kleen Rite (See Attach. A-1 for example)

YES NO

___ ✓ Does Control Mechanism designate a discharge point? [403.5(b)(8)]

It's just understood discharge is to be "above lift station"

___ ✓ 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

Describe the discharge point(s) (including security procedures):
At the headworks with an employee witnessing for septage & porta potty wastes being hauled in.

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

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

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

Pollutant	Limit
n/a	

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES	NO	
✓		Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

6/04 Date Notified Letter Method of Notification
(See Attach. A-2 for example)

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

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

YES	NO	
	✓	Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI,Audit or Annual Report?

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
N/A			

YES	NO	
✓		Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]

	Headworks Analysis Completed?		Local Limits Needed? +		Local Limits Adopted?		MAHL/MAHC Numerical Levels Calc'd (lb/day / mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓			✓		✓	0.980/ 0.087
Cadmium (Cd)	✓			✓		✓	0.746/ 0.066
Chromium-Total	✓			✓		✓	4.292/ 0.381
Copper (Cu)	✓			✓		✓	4.208/ 0.374
Cyanide (CN)	✓			✓		✓	1.126/ 0.100
Lead (Pb)	✓			✓		✓	4.894/ 0.435
Mercury (Hg)	✓			✓		✓	0.003/<0.000
Molybdenum (Mo) *	✓			✓		✓	0.882/ 0.078
Nickel (Ni)	✓			✓		✓	5.880/ 0.522
Selenium (Se) *	✓			✓		✓	1.132/ 0.101
Silver (Ag)	✓			✓		✓	2.056/ 0.183
Zinc (Zn)	✓			✓		✓	3.378/ 0.300

** - If necessary for the sludge disposal option chosen.*
+ - MAHLs/MAHCs have historically not been exceeded with good safety factors.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

YES NO

___n/a___ Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

What method of allocation was used for local limits for each pollutant that has a local limit in-place? N/A

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)			
Cadmium (Cd)	"Would probably be uniform concentration based on flow if ever necessary"		
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? ____
N/A

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1/yr	1/year	
Other SIUs	1/yr	1/year	
Sampling:			
CIUs	1/yr	1/year	
Other SIUs	1/yr	1/year	
Reporting:			
CIUs	12/yr	2/year	No explanation given
Other SIUs	12/yr	2/year	"
Self-Monitoring:			
CIUs	12/yr	2/year	"
Other SIUs	12/yr	2/year	"

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

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

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
	✓	If requested? (None has requested)
	✓	To verify IU self-monitoring results?

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

	Analytical Method *	Name of Laboratory
Metals	AA-Flame or Furnace	ETC in Memphis
Cyanide	Spectrophotometric	" "
Organics	GC/MS	" "
Other		

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe: Nothing written but, common sense practices such as washing equip. after each event, dedicated sampling hoses/IU; relies on state's certification for contract labs

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

5 day Conventionals
<month Metals
" Organics

___ ✓ Is there an established protocol clearly detailing sampling location and procedures? *They have pictures of each IU's sampling station.*

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

If yes, explain: _____

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

YES	NO	
___	✓	Scheduled compliance monitoring
✓	___	Unscheduled compliance monitoring
✓	___	Demand monitoring for IU compliance
✓	___	IU self-monitoring
___	___	Other:_____

YES NO

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

I. ENFORCEMENT

YES NO

___ ✓ Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)] *(not even in their recent submittal)*

✓ ___ 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

**Not specific to BMP violations*

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

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

_____	Imprisonment
✓	Termination of Service
✓	Other: Water supply severance

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: *See Attach. A-3 for example*

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

YES NO N/A

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

Complete the following table for SIUs identified as SNC.

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

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

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

Has the Control Authority experienced any of the following:

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

YES	NO	
✓		Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount	
Civil	0	$	
Administrative	0	$	
Total	0	$	[WENDB-IUPN]

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

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

Are the following files computerized:

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

Can IU monitoring data can be retrieved by:

___	✓	Industry name
___	✓	Pollutant type
___	✓	Industrial category or type
___	✓	SIC Code
___	✓	IU discharge volume
___	✓	Geographic location
N/A		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? _____
___	✓	Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: _____

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

K. RESOURCES

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

One full time employee

YES	NO	
___	✓	Have any problems in program implementation been observed which appear to be related to inadequate funding? If yes, describe and show below the source(s) of funding for the program:

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

_____

_____

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	3 Isco & 1 Sigma auto samplers
✓	___	Safety equipment	Standard list
✓	___	Vehicles	1 pick-up
✓	___	Analytical equipment	for standard conventionals

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

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

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

3. Has the POTW implemented any kind of public education program? If yes, describe:
Plant tours for school kids periodically; Newspaper articles written & published regarding recycling, grease, pharmaceuticals disposal, where storm drain wastes end up and an article describing the purpose of the City's wastewater treatment plant & what it accomplishes.

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

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

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

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Claridge Extrusions File/ID No. 001-05
Industry Address 219 Industrial Park Road, 72602
Industry Description Extrude Aluminum door/window/dry erase board frames

Industrial Category Aluminum Forming 40 CFR 467 SIC Code: 3354,3471
Ave. Total Flow (gpd) 17,800 Ave. Process Flow (gpd) 14,800
870-743-2200
Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name ADC Mfg. (Anchor Die Cast) File/ID No. 004-05
Industry Address 300 N. Industrial Park Road
Industry Description Mfg. chain link fence material
Industrial Category Metal Finishing/Metal Molding/Fe & Steel 40 CFR 420,433,464
SIC Codes: 3363, 3469 & 3479
Ave. Total Flow (gpd) 4,000 Ave. Process Flow (gpd) 3,500
870-741-6193
Industry visited during audit: YES

Comments:

FILE #: 3 Industry Name Duncan Tech. File/ID No. 007-05
Industry Address 340 Industrial Park Road, 72601
Industry Description Mfg. & assembly of parking meters
Industrial Category Met.Finish/Metal Molding 40 CFR 464,433 SIC Code: 3824
Ave. Total Flow (gpd) ? Ave. Process Flow (gpd) 0 @ this time
870-391-6229
Industry visited during audit: YES

Comments: Facility plans to discontinue die-casting ops

FILE #: 4 Industry Name Claridge Products File/ID No. 002-05
Industry Address 601 Hwy. 62-65 South, 72602 (Liquid "chalk" systems)
Industry Description Enameling of Al sheet & steel sheet metl for dry erase boards
Industrial Category Porcelin Enameling 40 CFR 466 SIC Code: 2531,2542
Ave. Total Flow (gpd) 11,600 Ave. Process Flow (gpd) 2,600

Industry visited during audit: NO 870-743-2200

Comments:

FILE #: 5 Industry Name Pace Ind. File/ID No. 005-05
Industry Address 513 Hwy. 62/65 Bypass North
Industry Description Al die cast BBQ grill covers, elect. motor end caps
Industrial Category Metal molding & Casting 40 CFR 464.15 SIC Code: 3363
Ave. Total Flow (gpd) ? Ave. Process Flow (gpd) 25,000

Industry visited during audit: YES

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

	CE FILE 1	Anch FILE 2	Dunc FILE 3	CP FILE 4	P 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	ES
b. Is this IU one identified as having P^2 potential?	no	no	no	no	no

B. Control Mechanism

1. Does the file contain an application for a control mechanism? *(See Attach. A-4 for example)*	✓	✓	✓	✓	✓
If yes, what is the application date?	4/05	6/05	4/05	4/05	3/05
Does it ask for Pollution Prevention information?	no	no	no	no	no
2. Does the file contain a Permit?	✓	✓	✓	✓	✓
Permit Expiration Date?	8/10	8/10	8/10	8/10	8/10
Is a fact sheet included?	1	✓	✓	✓	✓
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	2	2	2	2	2
b. Expiration date?	✓	✓	✓	✓	✓
c. Statement of nontransferability?	✓	✓	✓	✓	✓
d. Appropriate discharge limitations?	3	✓	✓	✓	✓
e. Appropriate self-monitoring requirements?	✓	✓	4	✓	✓
f. Sampling frequency?	✓	✓	✓	✓	✓

Comments: 1) See Attachment A-5 for example. Needs updated flow schematic to reflect new Pret. bldg since they're not using the outdoor, uncovered settling ponds; 2) Recommend including specific Ordinance or City Code # on cover page of permits; 3) Permit still includes rainwater/dilution factor. Needs to be changed; 4) Facility plans on shutting down the casting ops and haven't cast since 3/08(?).

SECTION III: INDUSTRIAL USER FILE REVIEW

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

C. Application of Standards

1.	Has the IU been properly categorized?	✓	✓	✓	1	✓
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)]	no	no	no	no	no
4.	For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	✓	✓	✓	4	✓

Comments: 1) doesn't specify (just "24 hr. composites" referenced in permits); 2) Recommend including specific $1,000/day/violation penalty; 3) "Addendum" letter (See Attach. A-6) should have also included "dilution prohibited"; 4) City chose the concentration limitations instead of converting to mass as allowed if dilution is suspected.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	✓	n/a	✓	n/a	✓
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	n/a
7. Is the Control Authority applying a bypass provision to this IU?	no	no	no	no	no

D. Compliance Monitoring

Sampling

1. Does the file contain Control Authority sampling results for the industry?	1	1	1	1	1
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	✓
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	✓
b. Sample date and time?	✓	✓	✓	✓	✓
c. Sample type?	✓	✓	✓	✓	✓
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	✓
e. Sample preservation procedures?	✓	✓	✓	✓	✓
f. Chain-of-custody records?	✓	✓	✓	✓	✓
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	✓

Comments: 1) City also conducts a priority pollutant scan on all SIUs, 1/yr

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	1	1	1	n/a	1
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	2	2	2	2	2
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	✓
Inspections					
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	5/07	5/07	12/07	5/07	12/07
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?	✓	✓	✓	✓	✓
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	3	3	3	3	3
f. Evaluation of pretreatment facilities?	3	3	3	3	3
g. Evaluation of self-monitoring equipment and techniques?	no	no	no	no	no

Comments: 1) Footnote in permits could be added to include list of toxic organics for the specific category; 2) Permits say "24 hr composites". As most of its SIUs are batch dischargers, permit language should reflect this condition: "representative grabs throughout batch discharge period"; 3) "on file @ IU's & Pret. office"

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Comments: 1)See previous page item #3; 2) should include brief description or have IU submit these procedures; 3) Inspection should include any chem. handling, haz. or not; 4) city rep. says he does occasionally witness but there's no documentation

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
14. Did the IU report flow?	✓	✓	✓	✓	✓
15. Did the IU comply with the required reporting frequency(s)?	✓	✓	✓	✓	✓
16. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	✓	✓	✓
17. Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	n/a
18. Has the IU developed a Slug Control and Prevention Plan?	1	1	1	1	1
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	no
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	n/a	n/a	n/a	n/a	n/a
b. Did POTW respond to the spill?	n/a	n/a	n/a	n/a	n/a

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	n/a	n/a	✓	✓	✓
b. IU self-monitoring results?	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	n/a

Comments: 1) All SIUs have a SPCC that somewhat addresses "slugs" but could be more "slug" specific (See Attach. A-7 for example). Claridge Ext's needs to be updated because of their new pretreatment bldg;

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	3	5	2
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	n/a	n/a	✓	✓	✓
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	n/a	✓	✓	✓
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	n/a
6. Was the IU notified of all violations?	n/a	n/a	✓	✓	✓
7. Was follow-up enforcement action taken by the Control Authority?	n/a	n/a	✓	✓	✓
8. Did the Control Authority follow its approved ERP?	✓	✓	✓	✓	✓
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	n/a	n/a	✓	✓	✓
10. Is there a compliance schedule? If yes:	no	no	no	no	no
11. Were there any compliance schedule violations?	no	no	no	no	no
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	✓
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	✓
b. TRC	no	no	no	no	no
c. Pass through/Interference	✓	✓	✓	✓	✓
d. Spill/slug loads	✓	✓	✓	✓	✓
e. Reporting	✓	✓	✓	✓	✓
f. Compliance schedule	✓	✓	✓	✓	✓
g. others (specify)	--	--	--	--	--
13. Was the SIU published for SNC?	n/a	n/a	n/a	n/a	n/a
Date of publication.	n/a	n/a	n/a	n/a	n/a

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Harrison NPDES #: AR0034321

Date of Audit: 6/17 - 6/19/08 Date entered into QNCR: 9/5/08

(ASSESSMENT)		Level
NO	Failure to enforce against pass through and/or interference	I
NO	Failure to submit required reports within 30 days	I
NO	Failure to meet compliance schedule milestone date within 90 days	I
NO	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
NO	Failure to inspect or sample 80% of SIUs within the last reporting year	II
NO	Failure to enforce pretreatment standards and reporting requirements	II
YES	Other violations of concern Mainly admin. in nature and not using TRC for assessing SIU's	II SNC

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 Harrison NPDES #: AR0034321

Name, address and phone number of industry:
Duncan, 340 Industrial Park Rd., 870.741.5481

Type of industry:
Die Casting/Metal Finishing
CFRs 464 & 433

Date/Time of visit:
6/18/08 / 9:10 a.m.

Industry contacts: Brett Stratton/Mfg. Manager & Gerald Henry

		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 is not planning on die casting any more parking meters, the market has fallen so badly. March '08 is the last time they've fired up the melting pots for what little casting they've recently done. They've even outsourced their powder coating which included the phosphate coating stage. There are only 11 employees now.

Visit conducted by: Gilliam/Maples Date: 6/18/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Harrison NPDES #: AR0034321

Industry name: Duncan

Additional comments:

Discussions ensued regarding completely removing all Zn ingots on site (IU rep indicated he thought he had a local buyer) and disconnecting the gas lines to their melting pots.

Assembly is about all the activity ongoing at this facility. The five stage phosphatizing facility has only been in use once in the last 2 months for about an hour just to get a few parts painted for a local customer. The facility rep even indicated removing that line also. Parking meter covers are cast and painted in other locations and just sent to the Harrison facility for assembly.

The City rep left the option up the IU rep to get with his upper management whether they wanted to keep their permit to discharge w.w. from the die casting and metal finishing or to completely remove all categorical processes from the facility and have their permit closed. Left facility on that note. Any future reports until their management makes the decision whether to keep the processes or not, could be sent to the City indicating "no process w.w. discharged" if that's truly the case.

Some old parking meters are still sent in for rebuilding.

Sampling station adequate for when they used to discharge process wastewater.

Visit conducted by: Gilliam/Maples Date: 6/18/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Harrison NPDES #: AR0034321

Name, address and phone number of industry:
Claridge Extrusions, 219 Industrial Park Road, 870.743.2200

Type of industry: Al Extrusion/Anodizing CFR 467 Date/Time of visit: 6/18/08 / 12:02 p.m.

Industry contacts: Harry Wagoner, Darrin Tuck & Anthony Bowers - Anodizing Operator

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

Additional comments: Facility's processes have not changed substantially since last audit (5/04). Raw material consists of various alloyed aluminum. End products include door and window frames "colorized" or otherwise coated/painted. Most frames go to their sister "liquid chalkboard" facility. Billets are brought in, heated to approx. 875 degrees F, then forced through carbon steel dies in long strips. Configured strips are air cooled and "stretched" with no wastewater generated. Oils from the extrusion press ops are closed loop, filtered and recirculated until spent, then sent off-site for disposal.

Visit conducted by: Gilliam/Maples Date: 6/18/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Harrison NPDES #: AR0034321

Industry name: Claridge Extrusions

Additional comments:

Material is cut to desired length, then aged in an oven. ~75% of their product is sent to their sister plant as frames for their "wet chalk" boards. Depending on customer specs. the pieces are phosphatized/rinsed for either powder or wet painting (~2 to 3%). Or they are "colorized" in the anodizing (~25%) process. The rest (just "mill finish") makes up about ~60% of their product. This process line consists of 18 tanks with various acid etches/rinses, desmut bath, alkaline baths/rinses (some that are counter current cascade [ccc] flow). Most baths/rinses are heated.

Wastewaters are gravity drained to a concrete sump outside building where it is pH neutralized. A new pretreatment system (inside a new bldg) has been installed to replace the old outside settling ponds. From the old pH adjustment pit, it is pumped to a stirred holding tank, then to a clarifier (inclined plate) where polymers are added for metals' settling. Overflow is sent directly to the City. Sludge from the bottom is sent to a cone-bottomed tank. The bottoms are fed to a filter press and then filtered to the City. The dump drain also an automatic feed for pH adjustment, mixer and can also be re-pumped back thru the filter press if necessary.

IU rep was interested in the protocol for closing these outside settling ponds once they dry.

Flow schematics need to be revised.

Visit conducted by: Gilliam/Maples Date: 6/18/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Harrison NPDES #: AR0034321

Name, address and phone number of industry:
Anchor Die Cast, 300 N. Industrial Park Rd., 870.741.6193

Type of industry: Date/Time of visit:
Al Die Cast/Metal Fin./Fe & Steel 6/19/08 / 8:25 a.m.
CFRs 464/433/420

Industry contacts: Steven Kline - Plant Mngr.

		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	✓*		

*IU does have "teams" to identify more efficient processes

Additional comments: Facility makes hardware for chain link fence and has not changed basic operations since 5/04 audit. Raw material includes cold rolled carbon steel, aluminum and zinc. Facility does not make the mesh material. Three categorically regulated processes in operation at this facility makes for complex equivalent concentration limit calculations. IU rep is somewhat familiar with them. Facility is down to only one 8 hr. shift mainly with a second shift brought in on an as needed basis.

Visit conducted by: Gilliam/Maples Date: 6/19/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Harrison NPDES #: AR0034321

Industry name: ADC (Anchor Die Cast)

Additional comments:

The die cast (total of 7 die cast machines) part of the operation has caused the most problems for the IU. Installation of more efficient pretreatment (potassium permanganate for T.Phenol destruct) and a more efficient O&G removal system (belt skimmer and some hand skimmed) has kept them compliant (pretreatment is conducted only 2 to 3 days a week and only for about 2 to 3 hrs. on those days because of production decreases). They batch discharge every other day. Some of the steel hardware is sent through a caustic bath, pickled (sulfuric), followed by another caustic bath, pre-fluxed and then hot dipped coated (Zn galvanized) with very little wastewater generated from the end quench. The dross from this operation is fully recycled.

Other steel hardware is pickled, oiled then stamped with very little wastewater generated. The rinse after ball burnishing was upgraded with an immersion fire tube for heat which replaced the old steam heated system which generates less wastewater and has saved them money.

All three wastestreams are combined and batch treated before discharge to the POTW. IU has had very few problems with compliance and is familiar with their effluent guidelines and the equivalent concentration limits' basis. Powder coating Al is a new process added. The phosphatizing process is a 5 stage process with filters for each stage.

Sampling point should be covered.

Chemicals are hauled in on an as needed basis so there's very little storage.

Visit conducted by: Gilliam/Maples Date: 6/19/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Harrison NPDES #: AR0034321

Name, address and phone number of industry:
Pace Ind., 513 Hwy. 62/65 Bypass North 870.741.8255

Type of industry: Al die casting CFR 464 Date/Time of visit: 6/19/08 / 10:10 a.m.

Industry contacts: Mark Piper-Safety & Env. Coordinator

		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 mainly die casts Al into BBQ grill "shells". Currently, there are about 30 die cast machines. Questions ensued regarding the large quantities of "mold cooling" waters. IU rep indicated this water is from the spraying of the open molds for cooling and anti-seize mixture application. Their Al group is currently being sold off by Ligget Platt.

Visit conducted by: Gilliam/Maples Date: 6/19/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Harrison NPDES #: AR0034321

Industry name: Pace Industies

Additional comments:

They have 7 melting pots. Die casting includes an ample spray of water on the open molds to cool them and apply the anti-seize mix. All this W.W. is gravity fed via floor drains to a sump, then pumped to an outside 20,000 gal. pretreatment holding tank which has secondary containment.

Even the steam cleaning of the floors is sent to "pretreatment". Discharged water is physically measured by markings on the tank. It was estimated ~25,000 gpd is discharged. W.W. from the outside holding tank is fed into "pretreatment" where coagulants are added to the first tank in the system to help bring the pH down and "break the water down". It then gravity feeds into a second tank where a lime mixture is added to help "break the solids out". Then it is pumped to a clarifier where polymers and air are injected into the line which helps "collect" the solids. Solids float to the top of the clarifier where a skimming device removes the solids, O&G and other impurities. The "skimmings" are pumped out to the "sludge pit" and hauled off-site to a landfill.

Questions were asked about their outside chemical storage (drums and totes) area and whether IU rep saw any housekeeping issues.

They do have an internal team that conducts inspections to discover environmental issues and make improvements.

Building is built to contain any major spills.

Visit conducted by: Gilliam/Maples Date: 6/19/08

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

ARNOLD ROGERS
Wastewater Systems Mgr.

P.O. Box 1715
Harrison, AR 72602
(870)741-5527
Fax(870)741-5022

CITY OF HARRISON
DEPARTMENT OF PUBLIC WORKS

Frank C. Gelinas
Director of
Public Works

AGREEMENT BETWEEN KLEEN RITE SEPTIC TANK SERVICE OF HARRISON AND THE CITY OF HARRISON WASTEWATER TREATMENT PLANT

Kleen Rite understands that nothing other than residential septic waste will be allowed at the wastewater treatment plant. NOTHING HAZZARDOUS. NO COMMERICAL GREASE OR ANYTHING THAT WILL UPSET THE WASTEWATER TREATMENT WILL BE ALLOWED.
This agreement may be cancelled by the City of Harrison WWTP for any reason at any time.

This 16th day of June 2006

Representing Kleen Rite (print & sign)

---------- ----------

Representing WWTP (print & sign)

---------- ----------

Attachment #2

ARNOLD ROGERS
Wastewater Systems Mgr.
P.O. Box 1715
Harrison, AR 72602
(870)741-5527
Fax(870)741-5022

CITY OF HARRISON

DEPARTMENT OF PUBLIC WORKS

Frank C. Gelinas
Director of
Public Works

Wood Motor Co
600 Hwy 62-65 Bypass N
Harrison AR 72601

06-04-04

During a recent audit by ADEQ (Arkansas Department of Environmental Quality) it has been determined that this office has a responsibility to notify hazardous waste generators of their reporting requirements under 40 CFR 12 (j) & (p). A copy of this section in enclosed.

Sincerely

Rick Maples
Pretreatment Coordinator

Cc Arnold Rogers
Wastewater Systems Manager

Copies of Web Sent

CITY OF HARRISON
Department of Public Works
Pollution Control

Rick Maples
Pretreatment Coordinator

P.O. Box 1715
Harrison, AR 72601
Email: hwwtp2@alltel.net

Phone (870) 741-4426
Fax (870) 741-5022

and addresses, or a list of deletions and additions keyed to a previously submitted list. The POTW shall provide a brief explanation of each deletion. This list shall identify which Industrial Users are subject to categorical pretreatment Standards and specify which Standards are applicable to each Industrial User. The list shall indicate which Industrial Users are subject to local standards that are more stringent than the categorical Pretreatment Standards. The POTW shall also list the Industrial Users that are subject only to local Requirements.

(2) A summary of the status of Industrial User compliance over the reporting period;

(3) A summary of compliance and enforcement activities (including inspections) conducted by the POTW during the reporting period; and

(4) Any other relevant information requested by the Approval Authority.

(j) *Notification of changed discharge.* All Industrial Users shall promptly notify the POTW in advance of any substantial change in the volume or character of pollutants in their discharge, including the listed or characteristic hazardous wastes for which the Industrial User has submitted initial notification under 40 CFR 403.12(p).

(k) *Compliance schedule for POTW's.* The following conditions and reporting requirements shall apply to the compliance schedule for development of an approvable POTW Pretreatment Program required by § 403.8.

(1) The schedule shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the development and implementation of a POTW Pretreatment Program (e.g., acquiring required authorities, developing funding mechanisms, acquiring equipment);

(2) No increment referred to in paragraph (h)(1) of this section shall exceed nine months;

(3) Not later than 14 days following each date in the schedule and the final date for compliance, the POTW shall submit a progress report to the Approval Authority including, as a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with this increment of progress, the reason for delay, and the steps taken by the POTW to return to the schedule established. In no event shall more than nine months elapse between such progress reports to the Approval Authority.

(l) *Signatory requirements for industrial user reports.* The reports required by paragraphs (b), (d), and (e) of this section shall include the certification statement as set forth in § 403.6(a)(2)(ii), and shall be signed as follows:

(1) By a responsible corporate officer, if the Industrial User submitting the reports required by paragraphs (b), (d) and (e) of this section is a corporation. For the purpose of this paragraph, 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) By a general partner or proprietor if the Industrial User submitting the reports required by paragraphs (b), (d) and (e) of this section is a partnership or sole proprietorship respectively.

(3) By a duly authorized representative of the individual designated in paragraph (l)(1) or (l)(2) of this section if:

(i) The authorization is made in writing by the individual described in paragraph (l)(1) or (l)(2);

(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.

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(4) If an authorization under paragraph (l)(3) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (l)(3) of this section must be submitted to the Control Authority prior to or together with any reports to be signed by an authorized representative.

(m) *Signatory requirements for POTW reports.* Reports submitted to the Approval Authority by the POTW in accordance with paragraph (h) of this section must be signed by a principal executive officer, ranking elected official or other duly authorized employee if such employee is responsible for overall operation of the POTW.

(n) Provisions Governing Fraud and False Statements: The reports and other documents required to be submitted or maintained under this section shall be subject to:

(1) The provisions of 18 U.S.C. section 1001 relating to fraud and false statements;

(2) The provisions of sections 309(c)(4) of the Act, as amended, governing false statements, representation or certification; and

(3) The provisions of section 309(c)(6) regarding responsible corporate officers.

(o) *Record-keeping requirements.* (1) Any Industrial User and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section. Such records shall include for all samples:

(i) The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;

(ii) The dates analyses were performed;

(iii) Who performed the analyses;

(iv) The analytical techniques/methods use; and

(v) The results of such analyses.

(2) Any Industrial User or POTW subject to the reporting requirements established in this section shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User). This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Director or the Regional Administrator.

(3) Any POTW to which reports are submitted by an Industrial User pursuant to paragraphs (b), (d), (e), and (h) of this section shall retain such reports for a minimum of 3 years and shall make such reports available for inspection and copying by the Director and the Regional Administrator. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the Industrial User or the operation of the POTW Pretreatment Program or when requested by the Director or the Regional Administrator.

(p)(1) The Industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. Such notification must include the name of the hazardous waste as set forth in 40 CFR part 261, the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the Industrial User discharges more than 100 kilograms of such waste per calendar month to the POTW, the notification shall also contain the following information to the extent such information is known and readily available to the Industrial User: An identification of the hazardous constituents contained in the wastes, an estimation of the mass and concentration of such constituents in the wastestream discharged during that calendar month, and an estimation of the mass of constituents in the wastestream expected to be discharged during the following twelve months. All notifications must take place within 180 days of the effective date of this rule. Industrial users who commence discharging after the

A-2c

effective date of this rule shall provide the notification no later than 180 days after the discharge of the listed or characteristic hazardous waste. Any notification under this paragraph need be submitted only once for each hazardous waste discharged. However, notifications of changed discharges must be submitted under 40 CFR 403.12 (j). The notification requirement in this section does not apply to pollutants already reported under the self-monitoring requirements of 40 CFR 403.12 (b), (d), and (e).

(2) Dischargers are exempt from the requirements of paragraph (p)(1) of this section during a calendar month in which they discharge no more than fifteen kilograms of hazardous wastes, unless the wastes are acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e). Discharge of more than fifteen kilograms of non-acute hazardous wastes in a calendar month, or of any quantity of acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e), requires a one-time notification.

Subsequent months during which the Industrial User discharges more than such quantities of any hazardous waste do not require additional notification.

(3) In the case of any new regulations under section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any additional substance as a hazardous waste, the Industrial User must notify the POTW, the EPA Regional Waste Management Waste Division Director, and State hazardous waste authorities of the discharge of such substance within 90 days of the effective date of such regulations.

(4) In the case of any notification made under paragraph (p) of this section, the Industrial User shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.

[46 FR 9439, Jan. 28, 1981, as amended at 49 FR 31225, Aug. 3, 1984; 51 FR 20429, June 4, 1986; 53 FR 40613, Oct. 17, 1988; 55 FR 30131, July 24, 1990; 58 FR 18017, Apr. 7, 1993; 60 FR 33932, June 29, 1995]

§403.13 Variances from categorical pretreatment standards for fundamentally different factors.

(a) *Definition.* The term *Requester* means an Industrial User or a POTW or other interested person seeking a variance from the limits specified in a categorical Pretreatment Standard.

(b) *Purpose and scope.* In establishing categorical Pretreatment Standards for existing sources, the EPA will take into account all the information it can collect, develop and solicit regarding the factors relevant to pretreatment standards under section 307(b). In some cases, information which may affect these Pretreatment Standards will not be available or, for other reasons, will not be considered during their development. As a result, it may be necessary on a case-by-case basis to adjust the limits in categorical Pretreatment Standards, making them either more or less stringent, as they apply to a certain Industrial User within an industrial category or subcategory. This will only be done if data specific to that Industrial User indicates it presents factors fundamentally different from those considered by EPA in developing the limit at issue. Any interested person believing that factors relating to an Industrial User are fundamentally different from the factors considered during development of a categorical Pretreatment Standard applicable to that User and further, that the existence of those factors justifies a different discharge limit than specified in the applicable categorical Pretreatment Standard, may request a fundamentally different factors variance under this section or such a variance request may be initiated by the EPA.

(c) *Criteria*—(1) *General criteria.* A request for a variance based upon fundamentally different factors shall be approved only if:

(i) There is an applicable categorical Pretreatment Standard which specifically controls the pollutant for which alternative limits have been requested; and

(ii) Factors relating to the discharge controlled by the categorical

A-2d

Attachment A-3

Pace Industries, L

A Leggett & Platt COMPANY

March 23, 2007

Rick Maples
Pretreatment Coordinator
City of Harrison Department of Public Works
PO Box 1715
Harrison, Ar 72602-1715

Re: February Zinc Results

Dear Rick,

As you can see our Zinc result is above permitted limits. We had another sample tested (for Zinc only) in February. As you can see the results of this second test are well within permitted limits. After a thorough investigation at our facility we cannot find a reason for such a difference in test results. We would suggest the possibility of error on the original test. We will be following your advice to have another lab sample for zinc for the next three months. As Environmental Services Company pulls their monthly sample we will pull a sample from the same source and send it to Pace Analytical for analysis. Rest assured we continue to explore all options including changing our contracted test lab.

Sincerely,

Mark Piper
Safety & Environmental Coordinator

MP/jrh

Post Office Box 1198 • Harrison, Arkansas 72601 • Telephone (870) 741-8255 • Fax (870) 741-4998

Pace Industries, Inc.

A Leggett & Platt COMPANY

4-18-07

Mr. Rick Maples
Pretreatment Coordinator
City of Harrison Dept. of Public Works
P.O. Box 1715
Harrison, AR 72602-1715

City of Harrison
APR 23 2007
W.W.T.P.

Subject: Permit No. 005-05
March 2007 Discharge Monitoring Report*

Pollutant Parameter	Sample Monitoring Result	Discharge Limits	
		Maximum Daily	Maximum Monthly Average
Copper (mg/L)	<0.003	0.29	0.16
Lead (mg/L)	<0.0100	0.15	0.15
Zinc (mg/L)	0.2500	0.42	0.16
Total Phenols (mg/L)	0.019	0.35	0.12
Oil & Grease (mg/L)	22.47	100	100
TTO (June and Dec.)	0.000	0.91	0.30
pH (S. U.)	9.5	6.0-10.0	
Temperature (°C)	20.20	66	
Daily Flows (gpd)			
Al Die Cast (est.)	22100	26457	20206
Non Contact (est.)	2731	3270	2497
Outfall 001	24831	29727	22703
Total Gallons for Month	703780		

Production Data:
Aluminum Poured (M-Lbs/month)8.5 est. daily max 0.3777 est. daily avg. 0.2833

"I have personally examined and am familiar with the information submitted in the attached document, and I hereby certify under penalty of law that this information was obtained in accordance with the requirements of 40 CFR 403.12. Moreover, based upon my inquiry of these individuals immediately responsible for obtaining the information reported herein, I believe the submitted information is true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Signature: David R. Thomason
David R. Thomason, Vice-President

Mark Pepper called me 4/20/07 to let me know of Zinc Violation & That They have Them Chemical people on the problem. RM 4/23/07

* *Report due by the end of the following month*

Attachment A-4

INDUSTRIAL WASTES DISCHARGE PERMIT

PERMIT NO. 001-05

In compliance with the provisions and conditions of the City of Harrison City Code and with any applicable provisions of federal or state of Arkansas law or regulation,

Claridge Extrusions
219 Industrial Park Road
P.O. Box 910
Harrison, Arkansas 72602

is authorized to discharge industrial wastes from activities classified by SIC Nos. 3354 and 3471 from premises located at the above address to the Harrison wastewater collection system in accord with the application form permit renewal submitted by the City of Harrison April 11, 2005 supplemented by review of discharge monitoring reports submitted by Claridge Extrusions past 12 months, Fact sheet developed for this renewal, effluent limitations, monitoring requirements, and conditions set fourth in Parts I, II, III hereof.

This permit shall become effective on August 15, 2005

This permit and authorization to discharge shall expire at midnight August 15, 2010.
This permit is not transferable to persons, companies, or processes other than to which it is originally used.

Signed this 1st day of August, 2005

Arnold Rogers
Wastewater System Manager

Frank Gelanis
Director of Public Works

PERMIT NO. 001-05

PART 1-EFFLUENT LIMITATIONS

OUTFALL NO. 001 - COMBINED WASTESTREAMS OF PRETREATED REGULATED WASTEWATER FROM ALUMINUM EXTRUDING OPERATIONS, ALUMINUM SECTION PHOSPHATIZING OPERATIONS AND ANODIZING OPERATIONS AND UNEVAPORATED RAINWATER (DILUTION STREAM) WHICH IS COMBINED WITH PRETREATED REGULATED WASTEWATER DURING PRETREATMENT AND IS DISCHARGED (AND SAMPLED FOR COMPLIANCE MONITORING) WITH PRETREATED REGULATED WASTEWATER: Process Wastewater regulated by National Categorical Standard for Aluminum Forming, Subpart C – Extrusion Subcategory - 40 CFR 467.35, Pretreatment Standards for Existing Sources. Pretreated wastewater diluted with unevaporated rainwater is discharged continuously from this outfall. This wastestream shall be monitored for the following listed pollutants, as set forth in Part II-Monitoring Requirements:

Pollutant Parameter	Maximum for Any One Day	Maximum for Monthly Average
Chromium (T), mg/l	0.72[1]	0.30[1]
Cyanide (T), mg/l	0.50[1]	0.21[1]
Zinc (T) mg/l	2.25[1]	1.01[1]
TTO, mg/l	1.13[1]	
Alternate Oil & Grease, mg/l	84.7[1,2]	41.9[1,2]
pH, S.U.	6.0-10.0[3]	
Oil & Grease, mg/l	100[3,4]	
Temperature	150°F (66°C)[3,5]	
Daily Flows, gpd		
Commingled Process Wastes from Extrusion, Phophatizing and Anodizing	Report	Report
Outfall No. 001	Report	Report

[1] Combined Wastestream at Outfall No. 1 in accord with 40 CFR 403.6 (e), with process wastewater and dilution stream as follows:

Wastestream Number	Regulated By	Description	Avg. Daily flow
1	40 CFR 467.35 Al. Extrusion Phosphatizing, & Anodizing	Commingled Al. Extrusion Phosphatizing, & Anodizing Wastewater	13,026 gpd
2	Non-regulated Dilution Stream	Unevaporated Rainwater	600 gpd
Average Total Flows at Outfall No. 001			13,626 gpd

Dilution Factor: $\frac{13{,}626 \text{ gpd} - 600 \text{ gpd}}{13{,}626 \text{ gpd}} = 0.956$

[2] Optional Alternate Oil & Grease shall only apply if Claridge Extrusions opts to meet this limitation as an alternate to meeting limit for TTO's. If Claridge Extrusions opts to meet the limit for TTO's the only limit for oil & grease that applies would be that limited by the Local Harrison Municipal code of 100 mg/l for any one day.

[3] Local Sewer Ordinance, Harrison Municipal code

[4] Oil & Grease limit of 100 mg/l for any one day shall only apply if Claridge Extrusions should opt to meet the limit for TTO's set forth herein.

[5] Claridge Extrusions shall not discharge heat in amounts which in combination with heat discharged to the sewer from other sources will inhibit biological activity at the Wastewater Treatment Plant, thereby resulting in interference with the wastewater treatment processes.

PERMIT NO. 001-05

PART II – MONITORING REQUIREMENTS

1. Claridge Extrusions shall provide a sampling access facility on its process pretreatment waste line at a point before the building sewer discharge mixes with other discharges in the public sewer. The location, configuration, and equipment contained in the sampling access facility shall be approved by the Director of Public Works.

2. Sampling and analysis of industrial waste discharge into the Harrison wastewater system shall be performed by Claridge Extrusions at no cost to the City of Harrison. The analyses shall be performed in accord to with 40 CFR 136 as amended or other test procedures approved by the Approval Authority by a laboratory acceptable by the Director of Public Works. The results of analyses shall be reported monthly to the Director of Public Works and shall include the following certification executed by a principal of Claridge Extrusions:

Certification of Monitoring Reports

"I have personally examined and am familiar with the information submitted in the attached document, and I hereby certify under penalty of law that this information was obtained in accordance with the requirements of 40 CFR 403.12. Moreover, based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment".

_____

Signature

_____

Title

3. Samples shall be taken on production and/or cleanup days. The day of the week on which the samples are taken may be varied and shall be determined by the Director of Public Works. Claridge Extrusions shall be notified by telephone of the selected sampling period, with follow-up documentation in writing.

4. The frequency of monitoring shall be monthly, unless the magnitude of potential effect of wasteloads and/or the results of monitoring indicate the need as determined by the Director of Public Works for more or less frequent monitoring. The frequency of compliance monitoring shall in no case be less than required for Categorical Industries by 40 CFR 403.12, twice per year in months of June and December. These samples shall be 24-hour composite samples except that temperature, pH, oil and grease, volatile organics, and cyanide shall be performed on grab samples.

5. The Claridge Extrusions monitoring point shall be:

   Outfall No. 001 - Manhole on effluent line from pretreatment system located on the North side of Claridge building and midway between the Claridge building and the pretreatment system decant ponds.

6. In addition to effluent analytical results of permit-limited pollutants discharged to the Harrison Wastewater System, Claridge Extrusions shall submit monthly production data in M Off-lbs of: 1) aluminum extruded; 2) extruded sections phosphatized; and, 3) extruded sections anodized. Claridge also shall report total daily commingled process wastewater produced from aluminum extrusion operations, extruded section phosphatizing, and extruded sections anodizing at a point prior to pretreatment and total daily pretreated industrial process wastewater plus dilution water (unevaporated rainwater collected in decant ponds and sludge drying beds, at Outfall No. 001

7. Discharged Monitoring Reports shall be submitted to the Director of Public Works by the last day of the month following the month during which the data was obtained.

8. In compliance with 40 CFR 403.12 (g) (2), if sampling performed by Claridge Extrusions indicates a violation, Claridge Extrusions shall notify the Director of Public Works within 24 Hours of becoming aware of the violation. Claridge Extrusions industries shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Director of Public Works within 30 days after becoming aware of the violation.

PERMIT NO. 001-05

PART III – CONDITIONS OF PERMIT

1. Claridge Extrusions shall pay to the City of Harrison the amount of $ 852.50 ,which amount represents the costs incurred by the City of Harrison evaluating Claridge Extrusions' request for an Industrial Discharge Permit.

2. Plans and specification for monitoring access facilities and for pretreatment facilities shall be approved by the Director of Public Works prior to construction.

3. Claridge Extrusions shall notify the Harrison Wastewater Treatment Plant Superintendent immediately (telephone no. 741-2525) once aware of any spill/slug loading of any pollutant released to the Harrison sewer system in such strength and/or volume as to cause interference in the wastewater treatment plant or cause conditions hazardous to operating personnel, equipment, the public, or the environment. Immediate appropriate action shall be taken by Claridge Extrusions to mitigate any adverse effects of spills/sludge loadings

4. Claridge Extrusions shall notify the Director of Public Works in advance, in writing, of any change in production or treatment process, which would significantly affect either the volume or character of wastewaters discharged to the Harrison sewer system.

5. Documentation of the disposal of sludge classified as "hazardous wastes" by a method and at a site approved by the appropriate state of Arkansas and federal regulatory agencies shall be maintained by Claridge Extrusions.

6. Claridge Extrusions shall, in Compliance with 40 CFR 403.12 (P)(1), notify the City of Harrison, EPA Region VI Waste Management Division and Arkansas Department of Environmental Quality Hazardous Waste Division in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR 261.

7. For the purpose of determining whether the Harrison Municipal Code and/or any permit or order issued hereunder is being met and whether Claridge Extrusions is complying with all requirements thereof, the Director of Public Works and/ or his authorized

FACT SHEET

2005 RENEWAL OF PERMIT NO. 001

1. SYNOPSIS OF APPLICANT INFORMATION

a. Name and address of applicant

Claridge Extrusions
219 Industrial Park Road
Harrison, Arkansas 72602

Contact Person: Harry Wagoner

Phone: ~~(501)~~ 870 743-2000

b. Description of Applicant's Operation

Claridge Extrusions custom extrudes, fabricates, paints and anodizes aluminum extrusion. Extrusion is the application of pressure to a billet of aluminum forcing the aluminum to flow through a die orifice. Fabrication is cutting, notching, drilling, bending and forming of extruded aluminum sections. Painting is by electrostatic and powder coating. Anodizing is the cleaning, etching, and chemical and electrostatic treatment of extruded sections through a series of process baths and rinses to produce a decorative and protective finish to the extruded sections.

c. Production Data

Claridge Extrusions has reported the following average daily production data over the last six months of record keeping.

Aluminum Sections Extruded:	0.037293 M Off-lb/Day
Aluminum Sections Anodized:	0.0098865 M Off-lb/Day
Aluminum Sections Phophatized:	0.0030763 M Off-lb/Day

d. Description of Pollution Abatement Facilities

Wastewater from aluminum extruding, aluminum anodizing and aluminum phospahtizing operations is commingled and only metered prior to pretreatment by chemical precipitation, with sedimentation, in outdoor ~~uncovered~~ earthen basins before discharge of POTW via Outfall No. 001. Compliance samples of pretreated wastewater combined with rainfall in excess of evaporation are collected as decant from the outdoor earthen basins. The surface areas of the outdoor earthen basins which potentially contributes a dilution stream equal to the annual rainfall of 55.3 inches less annual lake evaporation of 42 inches are:

2-50 ft. X 100 ft. decant ponds

1-50 ft. X 100ft. sludge drying bed

1-100ft. X 135ft. sludge drying bed.

Total area contributing to dilution equal to annual rainfall less annual lake evaporation is 28,500 sq. ft. Based on these areas and the rainfall/evaporation rates a dilution stream of 600 gpd was used in the calculations.

The average daily water discharged to the city including rainfall/evaporation at water usage is 13,626 gpd. This value is based on six months of Claridge Extrusion monitoring reports.

Wastestreams from sanitation facilities are discharged to the POTW at points other than via Outfall No. 001.

e. Description of Discharges

The information provided by Claridge Extrusions includes last twelve months discharge monitoring reports including analyses for permit limited pollutants and daily flow records for pretreated combined regulated process wastewater flow at

Outfall No. 001. The following is a tabulation of the content of the combined waste stream at outfall No. 001:

Average flow Regulated by 40 CFR 467.35

Aluminum Extrusions, anodizing, and phosphatizing 13,026 gpd

Average Non-regulated Dilution Flow:

Rain Water from Pretreatment process 600 gpd

Total Average Pretreated Wastewater

Reported at Outfall No. 001 13,626 gpd

2. EFFLUENT LIMITATIONS

The basis of the following proposed Effluent Limits for Claridge Extrusions are concentration base limits developed based on reported average daily wastewater generated from extrusions operations, extruded sections phosphatized and extruded sections anodized, combined wastestream formula, reported average daily production expressed in M off-lb day of aluminum extruded, extruded sections phosphatized and extruded sections anodized and mass limits prescribed per 40 CFR 464.35, Pretreatment Standards for Existing Sources. Calculations of the following effluent limitations are attached (Attachment A). These effluent Limitations must be met after pretreatment at Outfall No. 001.

	Concentration mg/l	
Parameter	Daily Maximum	Monthly Average
Chromium (T)	0.72	0.30
Cyanide (T)	0.50	0.21
Zinc (T)	2.25	1.01
TTO's	1.13	
Alternate O&G	84.7	41.9

The basis of the following proposed Effluent Limits for Claridge Extrusion are concentration limits prescribed by the Harrison Sewer Use Ordinance.

Parameter	Concentration mg/l Daily Maximum	Monthly Average
Oil & Grease	100	
pH	6.0 –10.0	
Temperature	150° F (66° C)	
Daily Flows, gpd		
Total of flow from Extrusion, Phosphatizing & Anodizing	Report	Report
Outfall No. 001	Report	Report

3. MONITORING REQUIREMENTS

a. Sampling and analysis of industrial wastes discharged into the Harrison wastewater system shall be performed by Claridge Extrusions at no cost to the City of Harrison.

b. Samples shall be taken on production and/or cleanup days. The day of the week in which the samples are taken may be varied and shall be determined by the Director of Public Works.

c. The frequency of monitoring shall be monthly, unless the magnitude of potential effect of wasteloads and/or the results of monitoring indicate the need as determined by the Director of Public Works for more of less frequent monitoring. The frequency of compliance monitoring shall in no case be less than that required for categorical industries by 40 CFR 403.12, twice per year in months of June and December.

d. Samples for required analyses shall be 24-hour composite samples except that temperature, pH, cyanide, volatile organics, and oil and grease shall be performed on grab samples.

e. Samples for required analyses shall be taken at Outfall No. 001. The sampling point is manhole of effluent line downstream of pretreatment system on the North side of Claridge building and midway between the Claridge building and the pretreatment systems decant ponds.

4. REPORTING REQUIRMENTS

In addition to effluent analytical results of permit limited pollutants discharged to the Harrison Sewer System, Claridge Extrusions is required to submit monthly production data in M off-lb of aluminum extruded, extruded sections phosphatized and extruded sections anodized. Claridge also shall report total daily commingled process wastewater produced from extrusions operations, extruded section phosphatizing and extruded section anodizing and total pretreated industrial wastewater and potential dilution water measured at Outfall No. 001. All reports must be submitted by the last day of the following month.

5. STANDARD CONDITIONS

The industrial waste discharge permit for Claridge Extrusions will include all the standard condition required by the City of Harrison.

Table 1. (LB/M OFF LB) Limiting Pollutants

	Chromium		Cyanide		Zinc		TTO's		Alternate O&G	
Regulated Operation	Max 1-day	Max Month Avg	Max 1-day	Max Month Avg	Max 1-day	Max Month Avg	Max 1-day	Max Month Avg	Max 1-day	Max Month Avg
	Aluminum Extruding									
Extrusion Core	0.15	0.061	0.098	0.041	0.049	0.21	0.23		18	8.8
Σ of Extruding	0.15	0.061	0.098	0.041	0.049	0.21	0.23		18	8.8
	Aluminum Anodizing									
Clean Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Clean Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Etch Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Etch Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Desniut Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Desmu Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Anodize or Dye Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Anodize or Dye Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Seal & Rinse	—	—	—	—	—	—	—		—	—
Σ of Anodizing	7.116	2.928	5.008	2.088	23.84	10.036	11.296		837.2	418.8
	Aluminum Phosphatizing									
Clean Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Clean Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Phosphate Etch Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Σ of Phospahtizing	1.858	0.764	1.304	0.544	6.22	2.618	2.948		218.6	109.4

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Note: (1)There are no pretreatment limiting pollutant regs for the seal and rinse production process.
(2) All pollutant limits come from 40 CFR 467.35

Table 2. Production Data

	Extrusion				Anodizing				Phosphatizing			
Month	Lbs/Month	Max Lbs/Day	Avg. Lbs/day	# of Days	Lbs/Month	Max Lbs/Day	Avg. Lbs/day	# of Days	Lbs/Month	Max Lbs/Day	Avg. Lbs/day	# of Days
June	867436	46680	36901	21	240372	14954	10926	22	30156	5247	3016	10
July	808219	45995	40544	21	188951	15947	8215	23	29715	9996	3714	8
August	774911	46680	36901	21	299177	19631	11967	25	20541	3845	2568	8
September	851433	45995	40544	21	225326	16753	10730	21	50944	7479	3184	16
October	698024	45870	33239	21	190822	12799	9087	21	39519	7512	3293	12
November	712578	47154	35629	20	167881	11490	8394	20	13417	5618	2683	5

Table 3. Daily Production Averages

Process	Average (M off Lbs) /day
Extrusion	0.037293
Anodizing	0.0098865
Phophatizing	0.0030763

Table 4. Water Usage (gallons).

Month	water discharged to City	water usage	average daily discharge	
June	224300	227300	7477	
July	321200	335600	10361	
August	448186	457800	14458	*
September	653776	667800	21793	*
October	532772	544200	17186	*
November	314500	316600	10483	

13626 : average daily discharge

B-4.m

NOTE: All data found in these tables is based on Claridge Products Monthly Report (6/04-11/04)

* Discharge meter to City broken, water discharged to City estimated based on prior months, 97.9 percent.

Table 5. Mass Limits for Each Process and Combined Mass Limits.

	Extrusion Mass Limits		Anodizing Mass Limits		Phosphatizing Mass Limits		Combined Mass Limits	
	Max 1-Day, lb/day	Max Monthly Avg, lb/day	Max 1-Day, lb/day	Max Monthly Avg, lb/day	Max 1-Day, lb/day	Max Monthly Avg, lb/day	Max 1-Day, lb/day	Max Monthly Avg, lb/day
Chromium	0.00559	0.00227	0.07036	0.02895	0.00572	0.00235	0.08166	0.03357
Cyanide	0.00365	0.00153	0.04951	0.02064	0.00401	0.00167	0.05718	0.02385
Zinc	0.00183	0.00783	0.23571	0.09923	0.01913	0.00805	0.25667	0.11511
TTO'S	0.00858		0.11168		0.00907		0.12933	
Alternate O&G	0.67122	0.28855	8.27740	4.14068	0.67241	0.33651	9.62103	4.76574

Table 6. Concentration Limits without dilution

	Max 1-Day, mg/l	Max Monthly Avg, mg/l
Chromium	0.75172	0.30905
Cyanide	0.52634	0.21950
Zinc	2.36261	1.05958
TTO'S	1.19046	0.00000
Alternate O&G	88.56139	43.86856

Note: Sample calculations can be found on pages 4 and 5

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Table 7. Concentration Limits with dilution

	Max 1-Day, mg/l	Max Monthly Avg, mg/l
Chromium	0.71865	0.29545
Cyanide	0.50318	0.20985
Zinc	2.25865	1.01296
TTO'S	1.13808	
Alternate O&G	84.66469	41.93835

Sample Calculations
Permit 001

Chromium:

Extrusion Mass Limits Max 1- Day:

Mass Limit = pollutant regulation* average production

Mass limit = (0.15 lbs/M-lbs)*(.037293 M-lbs/day)

Mass Limit= **0.00559 lbs/day**

Extrusion Mass Limits Max Monthly Average:

Mass Limit = pollutant regulation* average production

Mass limit = (0.061 lbs/M-lbs)*(.037293 M-lbs/day)

Mass Limit= **0.00227 lbs/day**

Anodizing Mass limits Max 1-Day:

Mass Limit = pollutant regulation* average production

Mass limit = (7.116 lbs/M-lbs)*(.0098865 M-lbs/day)

Mass Limit= **0.07036 lbs/day**

Anodizing Mass limits Max Monthly Average:

Mass Limit = pollutant regulation* average production

Mass limit = (2.928 lbs/M-lbs)*(.0098865 M-lbs/day)

Mass Limit= **0.02895 lbs/day**

Phosphatizing Mass limits Max 1-Day:

Mass Limit = pollutant regulation* average production

Mass limit = (1.858 lbs/M-lbs)*(.0030763 M-lbs/day)

Mass Limit= **0.00572 lbs/day**

Phosphatizing Mass limits Max Monthly Average:

Mass Limit = pollutant regulation* average production

Mass limit = (0.764 lbs/M-lbs)*(.0030763 M-lbs/day)

Mass Limit= **0.00235 lbs/day**

Note: Production information was compiled from 6 months of data that was provided by the City of Harrison. See Table 2 and Table 3 for these values.

Note: Mass limits calculations were based on 40 CFR 403.6 (C) (3).

Note: CFR pollutant limits can be found in Table 1.

Combined Mass Limit:

Combined mass limits were determined by summing the Extrusion mass limits, Anodizing mass limits, and Phosphatizing mass limits for Max 1-Day and Max Monthly average.

Combined Mass Limit of Max 1-Day = **0.08166 lbs/day**

Combined Mass Limit of Max Monthly = **0.03357 lbs/day**

Concentration Limits:

Chromium Concentration Limit Max 1-Day:

$$\text{Concentration} = \frac{(\text{combined mass limt})}{(\text{total flow} * 8.34)}$$

$$\text{Concentration} = \frac{(.08166\ \text{lb/day})}{(.013026\ \text{Mgpd} * 8.34)}$$

Concentration = **0.75172 mg/l**

Chromium Concentration Limit Max Monthly Average:

$$\text{Concentration} = \frac{(\text{combined mass limt})}{(\text{total flow} * 8.34)}$$

$$\text{Concentration} = \frac{(.03357\ \text{lb/day})}{(.013026\ \text{Mgpd} * 8.34)}$$

Concentration = **0.30905 mg/l**

Note: Flow information was compiled from 6 months of data that was provided by the Claridge Extrusions. See Table 4 for these values.

Note: Concentration Calculations were based on 40 CFR 403.6 (C) (4).

Combined Waste Stream Formula from 40 CFR 403.6 (e) (1) (i):

$$C_T = \frac{\left(\sum_{i=1}^{N} C_i F_i\right)}{\left(\sum_{i=1}^{N} F_i\right)} * \frac{(F_T - F_D)}{F_T}$$

Where:
C_T = Alternate Combined Limit by the combined waste stream formula
C_i = The Categorical Pretreatment Stand concentration limit for a pollutant regulated stream
F_i = The average daily flow (30 days) of stream; to the extent that it is regulated for such pollutant
F_T= The total flow at Monitoring point for which alternate concentration is calculated
F_D= Total flow of the dilution stream

Chromium Max 1-Day:

$$C_T = \frac{(0.71862\ mg/l * .013026\ Mgpd)}{(.013026\ Mgpd)} * \frac{(.013626\ Mgpd - .0006\ Mgpd)}{.013626\ Mgpd}$$

C_T = 0.7186 mg/l

Chromium Max Monthly Average:

$$C_T = \frac{(0.29544\ mg/l * .013026\ Mgpd)}{(.013026\ Mgpd)} * \frac{(.013626\ Mgpd - .0006\ Mgpd)}{.013626\ Mgpd}$$

C_T = 0.2954 mg/l

Note: F_D was assumed to be 600-gpd as rainwater as done in 2000 permit calculations.
Note: Combined waste stream numbers can be found in Table 7.

Attachment A-5

FACT SHEET

2005 RENEWAL OF PERMIT NO. 001

1. SYNOPSIS OF APPLICANT INFORMATION

a. Name and address of applicant

Claridge Extrusions
219 Industrial Park Road
Harrison, Arkansas 72602

Contact Person: Harry Wagoner

Phone: ~~(501)~~ 870 743-2000

b. Description of Applicant's Operation

Claridge Extrusions custom extrudes, fabricates, paints and anodizes aluminum extrusion. Extrusion is the application of pressure to a billet of aluminum forcing the aluminum to flow through a die orifice. Fabrication is cutting, notching, drilling, bending and forming of extruded aluminum sections. Painting is by electrostatic and powder coating. Anodizing is the cleaning, etching, and chemical and electrostatic treatment of extruded sections through a series of process baths and rinses to produce a decorative and protective finish to the extruded sections.

c. Production Data

Claridge Extrusions has reported the following average daily production data over the last six months of record keeping.

Aluminum Sections Extruded:	0.037293 M Off-lb/Day
Aluminum Sections Anodized:	0.0098865 M Off-lb/Day
Aluminum Sections Phophatized:	0.0030763 M Off-lb/Day

d. Description of Pollution Abatement Facilities

Wastewater from aluminum extruding, aluminum anodizing and aluminum phospahtizing operations is commingled and only metered prior to pretreatment by chemical precipitation, with sedimentation, in outdoor uncovered earthen basins before discharge of POTW via Outfall No. 001. Compliance samples of pretreated wastewater combined with rainfall in excess of evaporation are collected as decant from the outdoor earthen basins. The surface areas of the outdoor earthen basins which potentially contributes a dilution stream equal to the annual rainfall of 55.3 inches less annual lake evaporation of 42 inches are:

2-50 ft. X 100 ft. decant ponds

1-50 ft. X 100ft. sludge drying bed

1-100ft. X 135ft. sludge drying bed.

Total area contributing to dilution equal to annual rainfall less annual lake evaporation is 28,500 sq. ft. Based on these areas and the rainfall/evaporation rates a dilution stream of 600 gpd was used in the calculations.

The average daily water discharged to the city including rainfall/evaporation at water usage is 13,626 gpd. This value is based on six months of Claridge Extrusion monitoring reports.

Wastestreams from sanitation facilities are discharged to the POTW at points other than via Outfall No. 001.

e. Description of Discharges

The information provided by Claridge Extrusions includes last twelve months discharge monitoring reports including analyses for permit limited pollutants and daily flow records for pretreated combined regulated process wastewater flow at

Outfall No. 001. The following is a tabulation of the content of the combined waste stream at outfall No. 001:

Average flow Regulated by 40 CFR 467.35

Aluminum Extrusions, anodizing, and phosphatizing 13,026 gpd

Average Non-regulated Dilution Flow:

Rain Water from Pretreatment process 600 gpd

Total Average Pretreated Wastewater

Reported at Outfall No. 001 13,626 gpd

2. EFFLUENT LIMITATIONS

The basis of the following proposed Effluent Limits for Claridge Extrusions are concentration base limits developed based on reported average daily wastewater generated from extrusions operations, extruded sections phosphatized and extruded sections anodized, combined wastestream formula, reported average daily production expressed in M off-lb day of aluminum extruded, extruded sections phosphatized and extruded sections anodized and mass limits prescribed per 40 CFR 464.35, Pretreatment Standards for Existing Sources. Calculations of the following effluent limitations are attached (Attachment A). These effluent Limitations must be met after pretreatment at Outfall No. 001.

	Concentration mg/l	
Parameter	Daily Maximum	Monthly Average
Chromium (T)	0.72	0.30
Cyanide (T)	0.50	0.21
Zinc (T)	2.25	1.01
TTO's	1.13	
Alternate O&G	84.7	41.9

The basis of the following proposed Effluent Limits for Claridge Extrusion are concentration limits prescribed by the Harrison Sewer Use Ordinance.

Parameter	Concentration mg/l Daily Maximum	Monthly Average
Oil & Grease	100	
pH	6.0 –10.0	
Temperature	150° F (66° C)	
Daily Flows, gpd		
Total of flow from Extrusion, Phosphatizing & Anodizing	Report	Report
Outfall No. 001	Report	Report

3. MONITORING REQUIREMENTS

a. Sampling and analysis of industrial wastes discharged into the Harrison wastewater system shall be performed by Claridge Extrusions at no cost to the City of Harrison.

b. Samples shall be taken on production and/or cleanup days. The day of the week in which the samples are taken may be varied and shall be determined by the Director of Public Works.

c. The frequency of monitoring shall be monthly, unless the magnitude of potential effect of wasteloads and/or the results of monitoring indicate the need as determined by the Director of Public Works for more of less frequent monitoring. The frequency of compliance monitoring shall in no case be less than that required for categorical industries by 40 CFR 403.12, twice per year in months of June and December.

d. Samples for required analyses shall be 24-hour composite samples except that temperature, pH, cyanide, volatile organics, and oil and grease shall be performed on grab samples.

e. Samples for required analyses shall be taken at Outfall No. 001. The sampling point is manhole of effluent line downstream of pretreatment system on the North side of Claridge building and midway between the Claridge building and the pretreatment systems decant ponds.

4. REPORTING REQUIRMENTS

In addition to effluent analytical results of permit limited pollutants discharged to the Harrison Sewer System, Claridge Extrusions is required to submit monthly production data in M off-lb of aluminum extruded, extruded sections phosphatized and extruded sections anodized. Claridge also shall report total daily commingled process wastewater produced from extrusions operations, extruded section phosphatizing and extruded section anodizing and total pretreated industrial wastewater and potential dilution water measured at Outfall No. 001. All reports must be submitted by the last day of the following month.

5. STANDARD CONDITIONS

The industrial waste discharge permit for Claridge Extrusions will include all the standard condition required by the City of Harrison.

Table 1. (LB/M OFF LB) Limiting Pollutants

Regulated Operation	Chromium		Cyanide		Zinc		TTO's		Alternate O&G	
	Max 1-day	Max Month Avg	Max 1-day	Max Month Avg	Max 1-day	Max Month Avg	Max 1-day	Max Month Avg	Max 1-day	Max Month Avg
	Aluminum Extruding									
Extrusion Core	0.15	0.061	0.098	0.041	0.049	0.21	0.23		18	8.8
Σ of Extruding	0.15	0.061	0.098	0.041	0.049	0.21	0.23		18	8.8
	Aluminum Anodizing									
Clean Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Clean Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Etch Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Etch Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Desniut Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Desmu Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Anodize or Dye Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Anodize or Dye Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Seal & Rinse	——	——	——	——	——	——	——		——	——
Σ of Anodizing	7.116	2.928	5.008	2.088	23.84	10.036	11.296		837.2	418.8
	Aluminum Phosphatizing									
Clean Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Clean Rinse	1.7	0.7	1.2	0.5	5.7	2.4	2.7		200	100
Phosphate Etch Bath	0.079	0.032	0.052	0.022	0.26	0.109	0.124		9.3	4.7
Σ of Phospahtizing	1.858	0.764	1.304	0.544	6.22	2.618	2.948		218.6	109.4

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Note: (1)There are no pretreatment limiting pollutant regs for the seal and rinse production process.
(2) All pollutant limits come from 40 CFR 467.35

Table 2. Production Data

	Extrusion				Anodizing				Phosphatizing			
Month	Lbs/Month	Max Lbs/Day	Avg. Lbs/day	# of Days	Lbs/Month	Max Lbs/Day	Avg. Lbs/day	# of Days	Lbs/Month	Max Lbs/Day	Avg. Lbs/day	# of Days
June	867436	46680	36901	21	240372	14954	10926	22	30156	5247	3016	10
July	808219	45995	40544	21	188951	15947	8215	23	29715	9996	3714	8
August	774911	46680	36901	21	299177	19631	11967	25	20541	3845	2568	8
September	851433	45995	40544	21	225326	16753	10730	21	50944	7479	3184	16
October	698024	45870	33239	21	190822	12799	9087	21	39519	7512	3293	12
November	712578	47154	35629	20	167881	11490	8394	20	13417	5618	2683	5

Table 3. Daily Production Averages

Process	Average (M off Lbs) /day
Extrusion	0.037293
Anodizing	0.0098865
Phophatizing	0.0030763

Table 4. Water Usage (gallons).

Month	water discharged to City	water usage	average daily discharge	
June	224300	227300	7477	
July	321200	335600	10361	
August	448186	457800	14458	*
September	653776	667800	21793	*
October	532772	544200	17186	*
November	314500	316600	10483	

13626 : average daily discharge

A-5-f

NOTE: All data found in these tables is based on Claridge Products Monthly Report (6/04-11/04)

* Discharge meter to City broken, water discharged to City estimated based on prior months, 97.9 percent.

Table 5. Mass Limits for Each Process and Combined Mass Limits.

	Extrusion Mass Limits		Anodizing Mass Limits		Phosphatizing Mass Limits		Combined Mass Limits	
	Max 1-Day, lb/day	Max Monthly Avg, lb/day	Max 1-Day, lb/day	Max Monthly Avg, lb/day	Max 1-Day, lb/day	Max Monthly Avg, lb/day	Max 1-Day, lb/day	Max Monthly Avg, lb/day
Chromium	0.00559	0.00227	0.07036	0.02895	0.00572	0.00235	0.08166	0.03357
Cyanide	0.00365	0.00153	0.04951	0.02064	0.00401	0.00167	0.05718	0.02385
Zinc	0.00183	0.00783	0.23571	0.09923	0.01913	0.00805	0.25667	0.11511
TTO'S	0.00858		0.11168		0.00907		0.12933	
Alternate O&G	0.67122	0.28855	8.27740	4.14068	0.67241	0.33651	9.62103	4.76574

Table 6. Concentration Limits without dilution

	Max 1-Day, mg/l	Max Monthly Avg, mg/l
Chromium	0.75172	0.30905
Cyanide	0.52634	0.21950
Zinc	2.36261	1.05958
TTO'S	1.19046	0.00000
Alternate O&G	88.56139	43.86856

Note: Sample calculations can be found on pages 4 and 5

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Table 7. Concentration Limits with dilution

	Max 1-Day, mg/l	Max Monthly Avg, mg/l
Chromium	0.71865	0.29545
Cyanide	0.50318	0.20985
Zinc	2.25865	1.01296
TTO'S	1.13808	
Alternate O&G	84.66469	41.93835

Sample Calculations
Permit 001

Chromium:

Extrusion Mass Limits Max 1- Day:

Mass Limit = pollutant regulation* average production

Mass limit = (0.15 lbs/M-lbs)*(.037293 M-lbs/day)

Mass Limit= **0.00559 lbs/day**

Extrusion Mass Limits Max Monthly Average:

Mass Limit = pollutant regulation* average production

Mass limit = (0.061 lbs/M-lbs)*(.037293 M-lbs/day)

Mass Limit= **0.00227 lbs/day**

Anodizing Mass limits Max 1-Day:

Mass Limit = pollutant regulation* average production

Mass limit = (7.116 lbs/M-lbs)*(.0098865 M-lbs/day)

Mass Limit= **0.07036 lbs/day**

Anodizing Mass limits Max Monthly Average:

Mass Limit = pollutant regulation* average production

Mass limit = (2.928 lbs/M-lbs)*(.0098865 M-lbs/day)

Mass Limit= **0.02895 lbs/day**

Phosphatizing Mass limits Max 1-Day:

Mass Limit = pollutant regulation* average production

Mass limit = (1.858 lbs/M-lbs)*(.0030763 M-lbs/day)

Mass Limit= **0.00572 lbs/day**

Phosphatizing Mass limits Max Monthly Average:

Mass Limit = pollutant regulation* average production

Mass limit = (0.764 lbs/M-lbs)*(.0030763 M-lbs/day)

Mass Limit= **0.00235 lbs/day**

Note: Production information was compiled from 6 months of data that was provided by the City of Harrison. See Table 2 and Table 3 for these values.

Note: Mass limits calculations were based on 40 CFR 403.6 (C) (3).

Note: CFR pollutant limits can be found in Table 1.

Combined Mass Limit:

Combined mass limits were determined by summing the Extrusion mass limits, Anodizing mass limits, and Phosphatizing mass limits for Max 1-Day and Max Monthly average.

Combined Mass Limit of Max 1-Day = **0.08166 lbs/day**

Combined Mass Limit of Max Monthly = **0.03357 lbs/day**

Concentration Limits:

Chromium Concentration Limit Max 1-Day:

$$\text{Concentration} = \frac{(\text{combined mass limt})}{(\text{total flow} * 8.34)}$$

$$\text{Concentration} = \frac{(.08166\ \text{lb/day})}{(.013026\ \text{Mgpd} * 8.34)}$$

Concentration = **0.75172 mg/l**

Chromium Concentration Limit Max Monthly Average:

$$\text{Concentration} = \frac{(\text{combined mass limt})}{(\text{total flow} * 8.34)}$$

$$\text{Concentration} = \frac{(.03357\ \text{lb/day})}{(.013026\ \text{Mgpd} * 8.34)}$$

Concentration = **0.30905 mg/l**

Note: Flow information was compiled from 6 months of data that was provided by the Claridge Extrusions. See Table 4 for these values.

Note: Concentration Calculations were based on 40 CFR 403.6 (C) (4).

Combined Waste Stream Formula from 40 CFR 403.6 (e) (1) (i):

$$C_T = \frac{\left(\sum_{i=1}^{N} C_i F_i\right)}{\left(\sum_{i=1}^{N} F_i\right)} * \frac{(F_T - F_D)}{F_T}$$

Where:
C_T = Alternate Combined Limit by the combined waste stream formula
C_i = The Categorical Pretreatment Stand concentration limit for a pollutant regulated stream
F_i = The average daily flow (30 days) of stream; to the extent that it is regulated for such pollutant
F_T= The total flow at Monitoring point for which alternate concentration is calculated
F_D= Total flow of the dilution stream

Chromium Max 1-Day:

$$C_T = \frac{(0.71862\ mg/l * .013026\ Mgpd)}{(.013026\ Mgpd)} * \frac{(.013626\ Mgpd - .0006\ Mgpd)}{.013626\ Mgpd}$$

$$C_T = 0.7186\ \text{mg/l}$$

Chromium Max Monthly Average:

$$C_T = \frac{(0.29544\ mg/l * .013026\ Mgpd)}{(.013026\ Mgpd)} * \frac{(.013626\ Mgpd - .0006\ Mgpd)}{.013626\ Mgpd}$$

$$C_T = 0.2954\ \text{mg/l}$$

Note: F_D was assumed to be 600-gpd as rainwater as done in 2000 permit calculations.
Note: Combined waste stream numbers can be found in Table 7.

Attachment #6

ARNOLD ROGERS
Wastewater Systems Mgr.

P.O. Box 1715
Harrison, AR 72602
(870)741-5527
Fax(870)741-5022

CITY OF HARRISON

DEPARTMENT OF PUBLIC WORKS

Frank C. Gelinas
Director of
Public Works

THIS WENT TO ALL PERMITTED INDUSTRIES

10-26-07

To: Harry Wagoner
Claridge Extrusion

From: Rick Maples City of Harrison RM

Re: Addendums to Industrial Waste Discharge
Permit No. 001-05

A recent inspection of this office by EPA (Inspector James Eng US EPA Region VI) & ADEQ (District Field Inspector Bruce Kirkpatrick ADEQ Water Division) noted the following items need to be added to all City of Harrison Permitted Industry permits.

1) Industries cannot bypass Pretreatment for any reason.

2) EPA Inspectors shall not be refused right of entry.

3) The City of Harrison can terminate the above said permits anytime for any reason.

ARNOLD ROGERS
Wastewater Systems Mgr.

P.O. Box 1715
Harrison, AR 72602
(870)741-5527
Fax(870)741-5022

CITY OF HARRISON
DEPARTMENT OF PUBLIC WORKS

Frank C. Gelinas
Director of
Public Works

Please attach this memo to your Industrial Waste Discharge Permits. This memo is now part of your permit.

If you have any question, please contact me.

Thank you.

Sincerely

Rick Maples
Pretreatment Coordinator

Cc: Arnold Rogers Wastewater Systems Manager
File

Attachment A-7

CLARIDGE EXTRUSIONS
219 INDUSTRIAL PARK ROAD
HARRISON, ARKANSAS 72601

EPA NUMBER: ARD 000709014

CONTINGENCY PLAN

EMERGENCY PROCEDURES

SPILL PREVENTION

CONTROL AND COUNTERMEASURE

2007

EMERGENCY PHONE NUMBERS

AMBULANCE (North Arkansas Regional Medical Center)		911
HARRISON FIRE DEPARTMENTS (1 & 2)		911
NORTH ARKANSAS REGIONAL MEDICAL CENTER		365-2000 or 911
BOONE COUNTY SHERIFF'S OFFICE		741-8404 or 911
HARRISON POLICE DEPARTMENT		741-5463 or 911
ARKANSAS STATE POLICE		741-3455
OFFICE OF EMERGENCY SERVICES (STATE OFFICE)		(501) 730-9751
OFFICE OF EMERGENCY SERVICES, COORDINATOR	WORK	741-2950
ARKANSAS STATE DEPARTMENT OF HEALTH		(501) 661-2000
BOONE COUNTY HEALTH DEPARTMENT		743-5244
DEPARTMENT OF ENVIRONMENTAL QUALITY (through OES after hours)		(501) 682-0744
BOONE COUNTY JUDGE (Mike Moore)		741-5760
MAYOR (Pat Moles)		741-2777
CHEMTEL EMERGENCY PRODUCT DATA		1-800-255-3924
EPA OIL & HAZARDOUS MATERIAL TECHNICAL ASSISTANCE DATA SYSTEMS		(214) 767-2666
U.S. COAST GUARD NATIONAL RESPONSE CENTER		1-800-424-8802

TABLE OF CONTENTS

PURPOSE AND IMPLEMENTATION OF CONTINGENCY PLAN:

The following contingency plan has been designed for Claridge Products and Equipment, Inc., **Extrusion Division,** in order to minimize hazards to human health or the environment from fires, explosions, or release of hazardous waste or hazardous waste constituents to air, soil, or surface water, and for the safety and well-being of company employees.

This contingency plan covers spills, spill prevention control, and countermeasures.

This plan includes a list of all emergency equipment, its location, and physical description of each item listed.

This plan includes fire prevention and evacuation plans and alternate routes, and signals to be used to begin the evacuation in case of an emergency.

EMERGENCY COORDINATOR:

TITLE	INDIVIDUAL	PHONE NUMBER (after hours)
COORDINATOR	LOUIS MONDAY	741-6850
ALTERNATE	CECIL NEWSOM	365-0549
ALTERNATE	HARRY WAGONER	741-9352
ALTERNATE	BOB GALLIGHER	429-6117

Note: Any additions or deletions to above listed individuals and phone numbers will be posted on the company bulletin boards and posted to this contingency plan.

EMERGENCY COORDINATOR / ALTERNATE:

AMENDMENTS:

EMERGENCY PROCEDURES

At such time when an emergency situation exists, the Emergency Coordinator or his/her designee will:

(1) Activate internal facility alarms, and notify facility personnel.

(2) Notify State or Local agencies with designated response role, if their help is needed.

(3) Whenever there is a release, fire or explosion, the Emergency Coordinator must identify the character, exact source, and amount of any release material. He or she must also assess possible hazards to human health or the environment.

EMERGENCY PROCEDURES AMENDMENTS, ADDITIONS, OR DELETIONS:

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DESCRIPTION OF OPERATIONS

Claridge, Extrusion Division, is an extruder of aluminum trim for chalkboards, tackboards, and display cases, as well as an extruder and fabricator for custom window and door frames, and like accessories. **Claridge Extrusions**, extrudes, paints and fabricates aluminum extrusions.

The old wood shop, located at Claridge Extrusions, has been converted to a storage area for chalkboards.

All paints, thinners, etc. are stored in an adequately ventilated building constructed in complicance with all federal, state and local codes, and EPA.

All personnel at the **Extrusion Division** of **Claridge Products and Equipment, Inc.** are totally committed to the safety and health of its employees, as well as to the protection of our environment.

We take pride in the training of company personnel for the purpose of health and safety. We have qualified personnel in fire prevention and evacuation programming, CPR training, hazardous waste spills and evacuation.

GROUNDS SECURITY

The perimeter around the Extrusion Plant is secured by a chain link fence. Access to the property may be gained via a vehicle gate on the south side of the property. Also, we have a drive thru gate on the northeast side for access to our lagoons and drying bed, pollution building. Adequate lighting is available and the gates are closed at night to avoid entry by unauthorized personnel. Entry may be made by phone calls to the security personnel.

Inside and outside security is maintained by station turn key stations.

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HAZARDOUS WASTE (PICK-UP)

Waste paint, and related materials, are placed in the paint house. The drums are dated and identified with the proper labels. They are held there for pick up by a waste disposal company. All employees handling hazardous wastes have been trained as to their proper handling and storage.

SPILL CONTAINMENT

PROCEDURES - BARREL OR CONTAINER

1. Investigate location of leak.

2. Call primary contact on intercom or phone.

3. Select course of action:

   a. Side Leak - turn bucket or barrel on side.

   b. Bottom Leak - turn bucket or barrel upside down.

   c. a & b usually can be pumped into another barrel located in the paint house, using a pump from the storeroom.

4. Containment:

   a. Protective face shield and clothing available in anodizing.

   b. List of all materials and MSDS are kept in each department. Also, a master file is in the coordinator's office. A label is on each container to identify what was spilled.

   c. Available by Chemical Storage, Paint House, and Receiving door is an absorbent by the name of "new pig".

   d. Available at the paint line is a fifty (50) pound box of rags to be used to absorb material.

   e. Shovels to place sludge or more solid material into an open type barrel are available.

   f. Loader available for large spills.

   g. Report any hazardous material into air or water media to proper authorities.

   h. Report any hazardous material that has been spilled on floor, ground, or into sewer to proper authorities.

   i. Provide proper written details of spill.

LABEL IDENTIFICATION / CODES:

Charts and labels are available, and posted in the marked locations on the evacuation plans. These charts and labels give information to employees, and instructions as to the type of protective clothing, face shields, etc., to wear when handling specific types of paint, chemicals, etc.

These charts are posted and in compliance with the hazardous materials, substances and waste compliance guide.

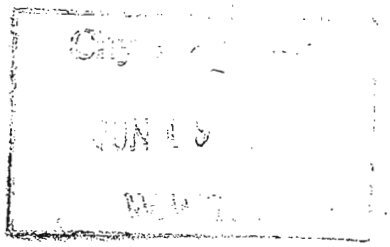
Additional new charts are stocked within the company, and are available upon request.

A-7m

need to update

CLARIDGE EXTRUSIONS

Anodize operation drains to a pit where an automatic pH adjuster is used to determine whether sodium hydroxide or sulfuric acid is required to achieve an acceptable pH level. When necessary adjustments have been made and when the pit fills to a given level it is pumped to holding ponds. In the line one gallon of WWT3891C cationic polymer is added to a 250-gallon water tank. The resulting mix is injected at 1%. It is then pumped into a line as waste and is discharged to a holding pond. The holding ponds serve presently as clarifiers. If level permits, the clear waste water is decanted to the sewer. A filter press is used to separate the bottom waste from the clear. The clear is discharged to the city sewer; the solid waste is dumped when the press is full into a 20 yard covered roll-off dumpster. The clear water separated from the solids are discharged to the city sewer.



Attachment A-8

Claridge® EXTRUSIONS
P. O. BOX 910 • HARRISON, ARKANSAS 72602-0910
PHONE: 870-743-2200 • FAX: 870-743-1908
E-MAIL: ext@claridgeproducts.com

DIVISION OF
CLARIDGE
PRODUCTS AND
EQUIPMENT
INCORPORATED

October 13, 2006

City of Harrison
OCT 13 2006
W.W.T.P.

City of Harrison
Department of Public Works
P. O. Box 1715
Harrison, AR 72602

Attention: Mr. Rick Maples

Subject: Slug Discharges
Claridge Extrusions

Dear Rick,

The purpose of this letter is to provide information for the "Slug Discharge Evaluation" for Claridge Extrusions, as dictated by 40CFR.8 (f)(2)(vi).

At our extrusions plant, the pretreatment building is the point through which process water enters the Harrison sewer line. Chemicals for pretreatment for the anodizing processes are stored in this building. Two old floor drains have been plugged to insure that no raw chemicals enter the Harrison sewer lines. Drains from the clarifier and filter press are currently monitored by an employee to keep any slug from entering.

If you have any other questions, or if you need additional information from us, please feel free to call. Thank you.

CLARIDGE EXTRUSIONS

Harry Wagoner

Harry Wagoner

HW/ph

EPA

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

NPDES Compliance Inspection Report

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

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1	2 5	3 AR0034321 11	12 080617 17	18 C	19 S	20 1

Remarks: HARRISON'S PRETREATMENT PROGRAM AUDIT

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

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1	2 5	3 AR0034321 11	12 080618 17	18 U	19 S	20 2

Remarks: 04 SIU SITE VISITS

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

Section B: Facility Data

Name and Location of Facility Inspected
Harrison's Pretreatment Program
PO Box 1715
Harrison, AR 72602

Entry Time	Permit Effective Date
☒ AM ☐ PM 7:00 am 6/17/08	10/1/07
Exit Time/Date	**Permit Expiration Date**
2:00 pm 6/19/08	9/30/2012

CODE SHEET

Pretreatment Audit

		CODE
Auditor's Name	Gillam	
Permit Number	AR0034321	
Audit Date	6/17-19/08	DTIA
Date Permit Modified to require pretreatment	5/14/84	PTIM

PPETS WENDB DATA ELEMENTS

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