

ADEQ

ARKANSAS
Department of Environmental Quality

September 23, 2011

Kathryn Catlin
Wastewater Systems Manager
City of Harrison Department of Public Works
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 Ms. Catlin,

Please find enclosed the finished report for the audit/assessment conducted August 30 through September 1, 2011. The report with required actions and recommendations should be made available for review and discussions by appropriate City officials. Please respond in writing within thirty 30 days with proposed corrective actions.

Harrison appears to have a new Pretreatment Coordinator interested in the Program and motivated in its implementation. Mr. Holt's receptive attitude and cooperation throughout the Audit should be commended.

In this office's opinion, more P2 activities could be integrated into your Program. Some of the audit/assessment recommendations are meant to help your Program further evolve in this direction. It is felt Harrison is at a point with its Pretreatment Program to integrate a sustainable P2 Program. This auditor witnessed P2 activities at all 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 you and Mr. Holt during this Audit and becoming more familiar with Harrison, its industries and Pretreatment Program.

Please feel free to contact this office with any questions.

Sincerely,



Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist and Supporting Document Attachments

ec: Rudy Molina/EPA 6WQ-PO
Eric Fleming/NPDES Inspector Supervisor

**PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT**

CITY OF HARRISON, ARKANSAS

NPDES PERMIT #AR0034321

September 23, 2011

PREPARED BY:

Allen Gilliam

ADEQ State Pretreatment Coordinator

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Pretreatment Program Audit/Assessment Checklist:

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Section II: Program Analysis and Profile

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Reportable Noncompliance (RNC) Worksheet

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A) INTRODUCTION

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

An audit/assessment was performed August 30 through September 1, 2011, of the Pretreatment Program implemented by City of Harrison, Arkansas. Participants included:

Allen Gilliam	ADEQ / State Pretreatment Coordinator
Tim Holt	City of Harrison / Pretreatment Coordinator
Kathryn Catlin	City of Harrison / Wastewater Systems Manager

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 the Streamlining revisions to 40 CFR 403. A draft Pretreatment Ordinance was handed this auditor during the last audit in 6/08. 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.

The City's Coordinator mailed (11/09) a CD of the City's Ordinance and the revised Program's narrative including the Enforcement Response Plan, but no section discussing Technically Based Local Limits could be located. A final review of the entire Program modification is pending.

The City's POTW consists of automated fine screening; grit removal; primary clarification; two (2) parallel aeration basins (oxidation ditches); final clarifiers; UV disinfection; sludge thickening and re-aerated via cascade steps before discharge to Crooked Creek. Its design flow is 2.6 MGD but averages about 1.6 MGD. There's been no pattern of effluent toxicity recently shown.

The plant receives approximately 0.022 MGD from four (4) categorical industries. Sludge is thickened, chemical conditioned with ferric chloride and vacuum dewatered before being land applied. Estimated application rate was 2,334 *wet* metric tons/yr (2010 data).

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to their four (4) 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 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 403.8(f)(1)(iii)(B), "...individual...control mechanisms must be enforceable and contain, at a minimum, the following conditions: (3) Effluent limits, including Best Management Practices, based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law...and (5) Statement of applicable civil and criminal penalties for violation of Pretreatment Standards and requirements, and any applicable compliance schedule..."

- a) During the file review it was found the City's Ordinance Oil and Grease 100 mg/l limit remained on their four (4) production-based Categorical industries' limits' page (See Attch. A-3b for example). In all cases the Categorical production based limits, converted to*

equivalent concentration based limits were more stringent. The City must remove the City's Ordinance O & G limit from the permits.

- b)* During the file review it was discovered not all Chains of Custody had the appropriate preservatives or sample bottle types noted. The results of these samples could be considered invalid in a court of law if a Chain of Custody is not complete. The City should contact their contract lab to make appropriate revisions to their Chain of Custody to make them most complete.
- c)* During the file review it was discovered Claridge Extrusion's permit limits still included a dilution factor from its old settling ponds' rain water estimates. The facility's settling ponds are now closed and their permit limits must be re-calculated without a dilution factor.
- d)* During the file review it was found their industrial permits had no statement of the City's applicable civil and criminal penalties for violation(s) of Pretreatment Standards and requirements. The permits must be revised to include these provisions including the \$1,000/day/violation penalty.

2) 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..."

During the file review and IU site visits, it was apparent the City's inspection forms were not comprehensive enough to fulfill the above mentioned requirements. To wit: 1) No verification of production or flows were found on the inspection forms; 2) No verification of sampling techniques by the industries were found; 3) No verification of flow or pH meters calibrations could be found; and 4) The inspection forms (see Attch. A-4 for example) were very vague, or non-existent in all aspects regarding evaluation of sources of regulated wastewater, manufacturing processes, chemical handling and pretreatment system narratives.

It was explained to the City's Pretreatment Coordinator if a checkmark could be made beside each item on the Audit's IU file review checklist (attached in Section III, "Inspections", #9.a. through q.), their inspections could be considered adequate. An ADEQ IU inspection form was subsequently sent the City.

3) Under **40 CFR 403.8(f)(2)**, "Procedures. The POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to: (vi), Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User..."

During the file review, it was discovered the City's previous Pretreatment Coordinator relied on the industry representatives to evaluate their slug discharge potential (See Attch. A-5). The City is required to conduct this slug discharge potential evaluation.

During the four (4) site visits, there were no facilities visited who appeared (to this auditor) to have a slug discharge potential. The City has a basic slug evaluation form and must complete a slug discharge potential evaluation with the aid of their industry representatives and document the evaluations in their IUs' files.

4) 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."

- a)** During the file review and site visits, it was discovered not all facility schematics or process descriptions were comprehensive, current or accurate. The City must require its permitted industries to keep these documents updated.

While the City's current fact sheets are still a work in progress and lacking pertinent information, these should be sent to every industry representative to update (denoting the revision date on the document[s]).

- b)** Not all the City's production based categorical industries could provide information that their flow meters had been calibrated. The City must require these flow meters to be calibrated "per the manufacturer's instructions". Anchor Die Cast (ADC) had an in-line flow meter synchronized to a digital read-out. ADC representatives thought their flow meter had been calibrated "about two (2) years ago", but no documentation could be provided.

It was later discussed that the "five gallon bucket test with a stopwatch" method would be the easiest, most cost effective and allowable method for them for calibration.

These flow readings are critical to evaluating compliance with the City's production based categorical industries' limitations.

5) 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 in Attch. A-3e) in the narrative section, "Part II – Monitoring Requirements". 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 of samples should be taken under the different SIU circumstances.

6) Under *40 CFR 403.12(g)(2)*, “If sampling performed by an Industrial User indicates a violation, the User shall notify the Control Authority within 24 hours of becoming aware of the violation.”

During the file review Anchor Die Cast showed a permit limit exceedance. No record could be produced indicating ADC had notified the City of this violation “within 24 hours of becoming aware of the violation.” The City must enforce this Pretreatment requirement.

7) Under *40 CFR 403.8(f)(2)(vii)*, “Investigate instances of noncompliance with Pretreatment Standards and Requirements, as indicated in the reports and notices required under §403.12, or indicated by analysis, inspection, and surveillance activities described in paragraph (f)(2)(v) of this section.”

The City’s monitoring results for Claridge Products indicated a permit limit violation. The current Pretreatment Coordinator indicated a phone call was made to Claridge discussing the violation, but no documentation or record of communication (ROC) could be produced. It is imperative the City document and date any enforcement actions whether informal or formal. These records “start the enforcement clock” for possible escalated enforcement options if the facility does not achieve compliance in a timely fashion.

8) Under *40 CFR 403.12(j)*, “Notification of changed Discharge. All Industrial Users shall promptly notify [Harrison] in advance of any substantial change in the volume or character of pollutants in their Discharge...”

During the file review and site visit at Pace, it was noted the facility had added a zinc die casting operation to its existing aluminum die casting operations. No documentation could be produced indicating Pace had notified the City in advance of this “substantial change”. The City must enforce this Pretreatment requirement.

9) Under *40 CFR 403.18(d)*, “Approval procedures for non-substantial modifications. (1) The POTW shall notify the Approval Authority of any non-substantial modification at least 45 days prior to implementation by the POTW, in a statement similar to that provided for in paragraph (c)(1) of this section.”

It was discovered during the Audit interview and checklist review the City is now sampling its industries once/month also. This office applauds the City’s initiative. This is a non-substantial modification to the City’s Pretreatment Program, but ADEQ should have been notified.

If the City intends to continue this procedure, please submit the revised page(s) of the current Pretreatment Program which will include this procedure.

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

1) Strongly recommend sending all of the City's permitted industries a copy of their reporting requirements located in 40 CFR 403.12. One provision, 403.12(p), 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 comprehensive narratives and wastewater flow schematics. Any such revisions should include a revised date somewhere on the document.

2) Strongly recommend including monitoring frequency and the sample type (single grab, multiple grabs equally spaced over the period of discharge time, timed composite or flow proportioned composite) on the industries' permit limits' page.

The only reference to monitoring frequency and type of samples were in the industries permits' narrative "Part II – Monitoring Requirement" (see Attch. A-3e). It would be much easier to find these requirements on the permit limits' page since this is usually the only page an industry representative is interested in.

Site visits indicated different facilities either conducted a series of grab samples over the period of discharge or simply conducted timed composites. The City's sampling should be identical to that agreed upon with their industries as being representative of their daily wastewater characteristics [emphasis added].

3) While the previous City Pretreatment Coordinator started a basic fact sheet for each permitted industry, they are not comprehensive. While it is good idea to include the permit limits' basis in the permits (see Attch. A-3i), it is recommended to compile a separate fact sheet separate from the industries' permits. An example fact sheet used by another Arkansas city was subsequently sent. Also see <http://www.epa.gov/npdes/pubs/own0017.pdf>, Appendix I for EPA's recommended fact sheet information desired.

4) Recommend including the City specific Pretreatment Ordinance number on the cover page of the City's permitted industries' permits. Current language, "In compliance with the provisions and conditions of the City of Harrison City Code..." is vague.

5) Recommend continuing surveying and documenting sector based non-domestic users. A master list should be kept current per 40 CFR 403.12(i), "Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request..."

And, under 40 CFR 403.8(f)(ii), "Identify the character and volume of pollutants contributed to

[the City] by the Industrial Users identified under paragraph (f)(2)(i) of this section.” Other information which should be documented on this “master list” should include the chemicals used at the facility which is, may or potentially be discharged to the City and the non-domestic user’s end product.

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

6) While the City’s industry permits have a general prohibition regarding bypassing their pretreatment operation” (see Attch. A-3h), it is recommended to expand that language to reflect 40 CFR 403.17(d), “(d) Prohibition of bypass. (1) Bypass is prohibited, and the Control Authority may take enforcement action against an Industrial User for a bypass, unless...”

7) While the City’s industry permits have a general prohibition regarding dilution (see Attch. A-3h), it is recommended to expand that language to reflect 40 CFR 403.6(d), “Dilution [is] prohibited as substitute for treatment. Except where expressly authorized to do so by an applicable Pretreatment Standard or Requirement, no Industrial User shall ever increase the use of process water, or in any other way attempt to dilute a Discharge as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard or Requirement.”

8) Recommend developing a standard operating procedure (SOP) for sampling each of the City’s permitted industries. The SOP could include how the City cleans and stores their samplers, changing of tubing, dedicates tubing for each permitted industry with pictures of the actual sampling point. If grab sampling is done, an SOP should be developed describing those procedures also making sure the industries are sampling in the identical way.

9) Recommend re-organizing files to remove duplicate or draft documents. This re-organization should be best suited for the new City Pretreatment Coordinator. Documents older than three (3) years could be recycled. Exceptions would include current permit applications, enforcement related documents, slug discharge control plans (where applicable), toxic organic management plans (TOMPs), fact sheets, etc.

10) Recommend including Pollution Prevention (P2), best management practices (BMP), water and energy conservation questions on SIU permit applications. It was noted that Pace Industries is ISO 14001 certified which has a strong environmental compliance component to it.

11) Recommend including P2 practices implementation in all of the City’s industry permits with annual progress reporting requirements.

12) Recommend including the general and specific prohibitions in all permitted industries’ permits using the language in 40 CFR 403.5(a)(1) and (b)(1) through (8).

13) Recommend including in the City’s Pretreatment Ordinance, Section 10.08.01 another “Purpose and Policy” objective “(8)” “To encourage Pollution Prevention (P2) activities through waste minimization, source reduction, water and energy conservation.”

D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS

1) Finalize modifications to the City's Program to be current with 40 CFR 403. City Pretreatment personnel need to review its entire Program to identify other sections that need to be revised. A preliminary review of the City's Program modifications indicates it needs a few more corrections/revisions to be approvable.

2) Include a section in the City's Pretreatment Program entitled "Technically Based Local Limits" demonstrating (with ADEQ supplied spreadsheets if desired) that local limits are not necessary at this time. Language in that section should also include a statement that the City's Director of Public Works will allocate the Maximum Allowable Industrial Loadings (MAILs) as deemed necessary if it appears pass-through and interference is being caused by the City's industrial users or if the City's influent loadings exceed 80% (suggested) of the calculated Maximum Allowable Headwork's Loadings (MAHLs).

3) Revise the City's Pretreatment Ordinance section 10.08.06(4) "Specific Pollutant Limitations" with language referencing the Pretreatment Program's "Technically Based Local Limits" section with language similar to, ""Local Limits are developed, implemented and enforced to protect against pass through and interference. No Industrial User shall discharge or cause to be discharged into the POTW any wastewater pollutant concentration exceeding the Technically Based Local Limits (TBLLs) developed from time to time by the Director of Public Works as required in City's NPDES permit, 40 CFR 403.5 (c) and approved by ADEQ. TBLLs (if necessary) based on calculated site specific Maximum Allowable Industrial Loadings are located in the City's Pretreatment Program, Section [x]. At the discretion of the Director of Public Works, TBLLs shall be allocated, be imposed and shall apply at the "monitoring point" described in the individual industrial wastewater discharge permits. All concentration limits for metals shall be in terms of "total" metals unless otherwise indicated. At the discretion of the Director of Public Works, mass limitations may be imposed in addition to or in place of concentration based TBLLs. The Manager may also develop BMPs in individual wastewater discharge permits, to implement specific pollutant limitations. Such BMPs shall be considered Local Limits and Pretreatment Standards. When new Local Limits are implemented or revised, the Director of Public Works will provide individual notice to parties who have requested such notice and an opportunity to respond, as set forth by 40 CFR 403.5 (c) (3). This requirement of notice also applies when Local Limits are set on a case-by-case basis."

4) Include Best Management Practice (BMP) violations and enforcement options in the City's current Enforcement Response Plan and Enforcement Response Guide.

* * * * *

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

PRETREATMENT AUDIT CHECKLIST

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I:	General Information	Pages 1- 4
Section II:	Pretreatment Program Analysis	Pages 5-17
Section III:	Industrial User File Evaluation	Pages 18-25

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Harrison NPDES #: AR0034321
 Mailing address: P.O. Box 1715, Harrison 72601

Permit Signatory: Kathryn Catlin Title: Wastewater Systems Manager
 e-mail kathryn.catlin@cityofharrison.com
 Telephone: 870.741.5527 FAX NUMBER: 870.741.5022

Pretreatment Contact: Tim Holt Title: Pretreatment Coordinator
 Address: Same
 Telephone: 870.741.4426
 e-mail hwtp2@windstream.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: 8/30-9/1/11
 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>* Tim Holt</u>	<u>Pretreatment Coordinator</u>	<u>870.741.4426</u>
<u>Kathryn Catlin</u>	<u>Wastewater Systems Manager</u>	<u>870.741.5527</u>

* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>12/16/09</u>	<u>"Satisfactory"</u>
<u>PCI</u>	<u>12/22/08</u>	<u>"Satisfactory"</u>
<u>Audit</u>	<u>6/08</u>	<u>Admin. deficiencies and not using the TRC for assessing SNC</u>

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? (Met TRC SNC criteria for TSS violations)

.....
There's not been any substantial changes to the implementation of the City's Pretreatment Program since the last audit (6/08); therefore, not many changes to this entire checklist.

The City's new Pretreatment Coordinator, Tim Holt, has only been in this position for ~5 months. He's not entirely familiar with his predecessor's files' maintenance, forms or daily Pretreatment activities.

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)- 1.6 MGD

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

Industrial Contribution to this Treatment Plant

of SIUs: 4 # of CIUs: 4
Industrial Flow (mgd): .0224 Industrial Flow (%) : 1.4 %

Level of Treatment

Type of Process(es):

Primary Automated fine screen; grit removal; primary

Secondary ✓ clarifiers; 2 parallel oxidation ditches;

Tertiary final clarifiers; sludge thickner; vacuum dewatering, reaeration via cascade steps

Method of Disinfection: UV

Dechlorination N/A 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:

<u> ✓ </u> Land Application	<u>2334</u> wet metric tons/yr. (2010)
<u> </u> Incineration	<u> </u> dry tons/yr.
<u> </u> Monofill	<u> </u> dry tons/yr.
<u> </u> Mun. Solid Waste Landfill	<u> </u> dry tons/yr.
<u> </u> Public Distribution	<u> </u> dry tons/yr.
<u> </u> Lagoon Storage	<u> </u> dry tons/yr.
<u> </u> Other (specify)	<u> </u> 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~~ NPDES permit:
References requirements in 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?) In 1/08, the City's effluent showed lethality and sub-lethality for both species at 85% critical dilution. The City conducted 2 subsequent retests after the failures. Neither retest showed lethality or sublethality. No further action was required.

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u>4</u>	<u> </u>
Priority **	<u>4</u>	<u>4</u>	<u> </u>	<u> </u>
Biomonitoring	<u> </u>	<u>4</u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Other: <u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* 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 its NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated

Cause(s)

TSS - 11/10, 3/11 & 5/11

denitrifying problems; clarifier out of service service and flow meter out of service.

NH3-N - 5/11

Flow meter out of service because of lightning strike causing false flow readings

YES NO
 N/A

Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

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 the '08 audit, only their Ordinance mods to be current with the streamlining revisions were handed over to this auditor. Since that time, the City has submitted their entire Program mods which are still pending ADEQ internal review. A preliminary review indicated more changes will be required. During the audit, Ms. Catlin indicated they were going to start over on the mods.

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
<u>6/17/08</u>	<u>Ordinance mods to address changes to be current with the streamlining revisions to CFR 403.</u>
<u>11/24/09</u>	<u>2 CDs were mailed to this office with the rest of the Program mods to match the Ordinance revisions (see above comments).</u>

YES NO

Have any changes been made to any pretreatment program components (excluding any listed above)? If yes: City is now also conducting 1/month sampling of their industries.

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

- | | | |
|-------------------------------------|-------------------------------------|---|
| <u>YES</u> | <u>NO</u> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Require compliance schedules and IU reports |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Carry out inspection and monitoring activities |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Obtain remedies for noncompliance |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Comply with confidentiality requirements |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Establish Pollution Prevention |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Has the city developed and adopted a Pollution Prevention policy? |

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 (P2) 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:

	<u>Name of Jurisdiction</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1.	n/a	_____	_____	_____
2.	_____	_____	_____	_____

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

Problems

- Updating industrial waste survey n/a
- Notification of IUs _____
- Permit issuance _____
- Receipt and review of IU reports _____
- Inspection and sampling of IUs _____
- Assessment of IUs for P² activity _____
- Analysis of samples _____
- Enforcement _____
- Other: _____

Briefly describe other problems: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

IU Name	Problem	NPDES Permit Violation	
		Yes	No
n/a			

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

YES NO

Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) ? to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *~150 IU surveys were sent out in 4/11.*

If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P² 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 P² activity and the distribution of P² 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. 4 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 4 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 0 Noncategorical SIUs
- d. 2 Other regulated nonsignificant IUs (Describe) "porta-potty" hauler & a septage waste hauler
- 6 TOTAL of a. + d.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

- Has the POTW identified any IUs with Pollution Prevention opportunities?
 Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(GG) (1-4)]

If not, the Control Authority has defined "significant industrial user" to mean:
City has kept the old definition in its proposed Ordinance and has not chosen to include the optional parts of the definition.

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

- 0 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 |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> |
- Does Control Mechanism designate a discharge point? [403.5(b) (8)]
"Where influent enters the WWTP...with an authorized Harrison WWTP employee witnessing the event."
- | | |
|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|-------------------------------------|
- 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
<u>See Atch. A-1. The general and specific prohibitions from CFR 403.5 are included</u>	

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?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

<u>Pollutant</u>	<u>Limit</u>
<u>n/a</u>	

G. Application of Pretreatment Standards and Requirements

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

12/08 Date Notified Letter Method of Notification

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

<u> </u> Federal Register	<input checked="" type="checkbox"/> Journals, Newsletters
<input checked="" type="checkbox"/> Meetings, Training	<input checked="" type="checkbox"/> Other <u>Internet</u>
<input checked="" type="checkbox"/> Government Agencies	<u> </u> Other <u> </u>

 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:

<u>Pollutant</u>	<u>Old</u>	<u>New</u>	<u>Reason</u>
<u>Changed</u>	<u>Limit</u>	<u>Limit</u>	<u>for Change</u>
<u>N/A</u>			

 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)]

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

* - 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:

<u>POLLUTANT</u>	<u>Headworks Analysis Completed?</u>		<u>Local Limits Needed?</u>		<u>Local Limits Adopted?</u>		<u>Numerical Limit Adopted (mg/l)</u>
	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	
<u>n/a</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

 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

	<u>TYPE OF ALLOCATION</u>		
	<u>Uniform Concentration</u>	<u>Mass</u>	<u>Hybrid</u>
Arsenic (As)	<u> </u>	<u> </u>	<u> </u>
Cadmium (Cd)	<u>"Would probably be concentration based on</u>		
Chromium-Total	<u>contributory flow if ever necessary"</u>		
Copper (Cu)	<u> </u>	<u> </u>	<u> </u>
Cyanide (CN)	<u> </u>	<u> </u>	<u> </u>
Lead (Pb)	<u> </u>	<u> </u>	<u> </u>
Mercury (Hg)	<u> </u>	<u> </u>	<u> </u>
Molybdenum (Mo)	<u> </u>	<u> </u>	<u> </u>
Nickel (Ni)	<u> </u>	<u> </u>	<u> </u>
Selenium (Se)	<u> </u>	<u> </u>	<u> </u>
Silver (Ag)	<u> </u>	<u> </u>	<u> </u>
Zinc (Zn)	<u> </u>	<u> </u>	<u> </u>

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:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
Inspections:	Actual		
CIUs	<u>1/yr</u>	1/yr 1/year	_____
Other SIUs	<u>1/yr</u>	1/yr 1/year	_____
Sampling:			
CIUs	<u>1/yr</u>	12/yr 1/year	<u>To further ensure compliance</u>
Other SIUs	<u>1/yr</u>	1/year	<u>"</u>
Reporting:			
CIUs	<u>12/yr</u>	" 2/year	<u>"</u>
Other SIUs	<u>12/yr</u>	" 2/year	<u>"</u>
Self-Monitoring:			
CIUs	<u>12/yr</u>	" 2/year	<u>"</u>
Other SIUs	<u>12/yr</u>	" 2/year	<u>"</u>

<u>#</u>	<u>%</u>	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
<u>0</u>	<u>0</u>	Not sampled at least once in the past reporting year?
<u>0</u>	<u>0</u>	Not inspected at least once in the past Pretreatment reporting year?
<u>0</u>	<u>0</u>	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:

	<u>Analytical Method *</u>	<u>Name of Laboratory</u>
Metals	<u>ICP/MS (200.8)</u>	<u>ETC in Memphis</u>
Cyanide	<u>Spectrophotometric</u>	<u>" "</u>
Organics	<u>GC/MS</u>	<u>" "</u>
Other	<u>Hg - 1631E</u>	<u>Mercury One</u>

Biomonitoring Biomonitoring

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, ICP/MS, 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 days Conventionals
<2 wks 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)(viii)] *(not even in their recent draft Ord. 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

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

<u>#</u>	<u>%</u>	
<u>0</u>	<u>0</u>	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
<u>0</u>	<u>0</u>	Self-monitoring requirements [WENDB-MSNC]
<u>0</u>	<u>0</u>	Reporting requirements [WENDB-PSNC]
<u>0</u>	<u>0</u>	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:

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	\$ _____
Administrative	<u>0</u>	\$ _____
Total	<u>0</u>	\$ _____ [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: [The new City Pretreatment Coordinator of 5 months indicated he'll have to continue to discover where his predecessor kept different pieces of correspondence]

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
 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?
 "Would be kept in a locked file"

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

<input checked="" type="checkbox"/>	POTW general operating fund	<u>100</u>
<input type="checkbox"/>	IU permit fees	<u> </u>
<input type="checkbox"/>	monitoring charges	<u> </u>
<input type="checkbox"/>	industry surcharges	<u> </u>
<input type="checkbox"/>	other (describe) _____	<u> </u>
	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:

<u>YES</u>	<u>NO</u>		<u>If no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Legal assistance	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Permitting	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	IU inspections	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample collection	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample analyses	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data analysis, review and response	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enforcement	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Administration (inc. record keeping /data management)	_____

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>		<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	<u>3 ISCO & 1 Sigma auto samplers</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	<u>Standard list</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	<u>1 pick-up</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	<u>for standard conventionals</u>

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION (P2) ...

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:

With new Pretreatment Coordinator, it will take time to discover more about P2 before getting more involved in any P2 practices/programs. His predecessor did very little involving P2.

4. Does the POTW have any pollution prevention success stories for industrial users documented? No. If yes, please attach. *All the City's permitted IUs had some form of P2 practices ongoing, but no documentation had been asked for or recorded.*

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. 001-10
Industry Address 219 Industrial Park Road, 72602
Industry Description Extrude Aluminum door/window & dry erase boards frames
Industrial Category Aluminum Forming 40 CFR 467
SIC Code: 3354,3471 NAICS Code: 332813
Avg. Total Flow (gpd) ?? Avg. Process Flow (gpd) ~24,000
Industry visited during audit: YES
Comments: Anodizing and colorizing also conducted

FILE #: 2 Industry Name ADC Mfg. (Anchor Die Cast) File/ID No. 004-10
Industry Address 300 N. Industrial Park Road
Industry Description Mfg. chain link fence material
Industrial Category Metal Finishing/Metal Molding/Fe & Steel 40 CFRs 420,433,464
SIC Codes: 3363, 3469 & 3479 NAICS Code: 332812, 331521 & 332116
Avg. Total Flow (gpd) 4,000 Avg. Process Flow (gpd) 2,400
Industry visited during audit: YES
Comments: _____

FILE #: 3 Industry Name Claridge Products File/ID No. 002-10
Industry Address 601 Hwy. 62-65 South, 72602
Industry Description Enameling of steel sheet metal for dry erase boards
Industrial Category Porcelain Enameling 40 CFR 466
SIC Code: 2531,2542 NAICS Code: 339942 & 337215
Avg. Total Flow (gpd) ??? Avg. Process Flow (gpd) ~18,000
Industry visited during audit: YES
Comments: _____

FILE #: 4 Industry Name Pace Ind. File/ID No. 005-10
Industry Address 513 Hwy. 62/65 Bypass North
Industry Description Al die cast BBQ grill covers & Zn die cast numerous other
products for outside customers
Industrial Category Metal molding & Casting 40 CFR 464.15
SIC Code: 3363 NAICS Code: 331521
Avg. Total Flow (gpd) ? Avg. Process Flow (gal/month) 22,000
Industry visited during audit: YES
Comments: _____

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism

1. Does the file contain an application for a control mechanism? (See Attch. A-2 for example)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
If yes, what is the application date?	<u>4/10</u>	<u>3/10</u>	<u>4/10</u>	<u>3/10</u>	<u> </u>
Does it ask for Pollution Prevention information?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
2. Does the file contain a Permit? (See Attch. A-3 for example)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Permit Expiration Date?	<u>10/15</u>	<u>10/15</u>	<u>10/15</u>	<u>10/15</u>	<u> </u>
Is a fact sheet included?	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
3. Has the SIU been issued a control mechanism containing: [403.8(f) (1) (iii) (A)-(E)]					
a. Legal Authority Cite?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Appropriate discharge limitations?	<u>3 & 4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u> </u>
e. Appropriate self-monitoring requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
f. Sampling frequency?	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u> </u>

Comments: 1) See Attch. A-3i for example; 2) Specific Ordinance or City Code # is not on cover page of permits; 3) Permit still includes dilution factor from rainwater. Needs to be changed; 4) The 100 mg/l City Ordinance limit is still on their IUs' permit limits page and should be removed. The IUs' O&G alternative limits are lower; 5) Sample frequency should be seen on limit's page, not just in the narrative portion of the IUs' permits (see Attch. A-3e).

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Sampling locations?	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u> </u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
i. Types of samples (grab or composite) for self-monitoring?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Civil and Criminal Penalty provisions?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
Revocation of permit?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
l. Compliance schedules/ progress reports	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
m. General/Specific Prohibitions?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>4</u>	<u>4</u>	<u>4</u>	<u>5</u>	<u> </u>

Comments:) Type of samples (grab or timed/flow-proportional composites) should be seen on limit's page, not in narrative portion of the IUs' permits. It doesn't even specify what type of composite (see Attch. A-3e); 2) Will require including specific \$1,000/day/violation penalty; 3) Sampling point could be better described by footages from fixed reference points. Actual pictures of sampling points were discussed; 4) This auditor has personally been involved with 3 of their 4 production based categorical limits derivation; 5) Pace has since added Zn die casting. There was not adequate time to check their production based converted to concentration based limits although IU rep. indicated they had a consultant engineer double check their validity.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	<u>1</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
D. <u>Compliance Monitoring</u>					
<u> Sampling</u>					
1. Does the file contain Control Authority sampling results for the industry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
3. Does the sampling report(s) include: [403.8(f) (2) (vi)]					
a. Name of sampling personnel?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Sample date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Sample type?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Wastewater flow at the time of sampling?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
e. Sample preservation procedures?	<u>2</u> <u>no</u>	<u>2</u> <u>no</u>	<u>2</u> <u>no</u>	<u>2</u> <u>no</u>	<u> </u>
f. Chain-of-custody records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
g. Results for all parameters? SIUs & CIUs [403.12(g) (1) - CIUs]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>

Comments: 1) Claridge Extrusion's permit still includes a dilution factor for rainfall to their (now closed) settling ponds and should be removed; 2) Sample preservation nor proper containers were identified on all chains of custody.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Has the Control Authority appropriately implemented all applicable TPO monitoring/management requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
<u>Inspections (See Attachment A-4 for example)</u>					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Date of last Inspection	<u>12/10</u>	<u>12/10</u>	<u>12/10</u>	<u>12/10</u>	<u> </u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Verification of production rates?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u> </u>
f. Evaluation of pretreatment facilities?	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u> </u>
g. Evaluation of self-monitoring equipment and techniques?	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u> </u>

Comments: 1) Permits' narrative just says "24 hr composites"; 2) Not apparent; 3) Very vague descriptions, "as attached" (w/nothing attached), or nothing at all. The City needs to revise their industry inspection forms to be more comprehensive.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
i. Manufacturing facilities?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
j. Chemical handling and storage procedures?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
k. Chemical spill prevention areas?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
l. Hazardous waste storage areas and handling procedures?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
m. Sampling procedures?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
n. Laboratory procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
o. Monitoring records?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
p. Evaluation of Pollution Prevention opportunities?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
q. Control Authority inspector signature?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
<u>IU Self-Monitoring and Reporting</u> (See Attachment A-6 for example)					
10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
11. Does the file include:					
a. BMR?	<u>Arch.</u>	<u>Arch.</u>	<u>Arch.</u>	<u>Arch.</u>	<u> </u>
b. 90-Day Report?	<u>"</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u> </u>
c. All periodic reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
12. Did the IU report on all required parameters?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
13. Did the IU comply with the required sampling frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>

Comments: 1) City coordinator sent out correspondence (see Atatch. A-5) for the IUs to evaluate their Slug Potential. It is the City's responsibility to evaluate an IU's slug discharge potential; 2) Very vague descriptions, "as attached" (w/nothing attached), or nothing at all. The City needs to revise their industry inspection forms to be more comprehensive.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
14. Did the IU report flow?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
15. Did the IU comply with the required reporting frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>2</u>	<u> </u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>1</u>	<u>1</u>	<u>1</u>	<u>✓</u>	<u> </u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>no</u>	<u>n/o</u>	<u>no</u>	<u> </u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
b. Did POTW respond to the spill?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
<u>E. Enforcement</u>					
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u> </u>
b. IU self-monitoring results?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u> </u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>

Comments: 1) All SIUs have a SPCC that somewhat addresses "slugs" but need to be more "slug" specific. Pace Industries is the closest found. (See Atatch. A-7); 2) Pace added a Zn die-casting line, but no correspondence could be found in the City's file indicating this.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>2</u>	<u>(City's)</u> <u>4</u>	<u>1</u>	<u> </u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>n/a</u>	<u>no</u>	<u>n/a</u>	<u>✓</u>	<u> </u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>✓</u>	<u>1</u>	<u>✓</u>	<u> </u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/a</u>	<u>not nec.</u>	<u>nn</u>	<u>nn</u>	<u> </u>
8. Did the Control Authority follow its approved ERP?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
11. Were there any compliance schedule violations?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f) (2) (vii)]	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
b. TRC	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
c. Pass through/Interference	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
d. Spill/slug loads	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
e. Reporting	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
f. Compliance schedule	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
g. others (specify)	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u> </u>
13. Was the SIU published for SNC?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
Date of publication.	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>

Comments: 1) A phone call was made, but there was no record of it; 2) Too early to tell since the City's new Pretreatment Coordinator has only been there ~5 months and is not familiar with all aspects of the 40 CFR 403 requirements.

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Harrison NPDES #: AR0034321
 Date of Audit: 8/30 - 9/1/11 Date entered into ^{ICIS}~~ONCR~~: 9/23/11
 (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	II

SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

Control Authority: City of Harrison NPDES #: AR0034321

Industry name: _____

Additional comments: The metal sheets are first sent through a (continuously filtered) soap spray (potassium hydroxide @ ~13 s.u.) then rinsed and blow dried off. This operation's wastewater does not go through the facility's pretreatment. The porcelain is first jet sprayed onto the bottom of the horizontal steel sheets (held by magnets) then sent through an infrared (IR) drier to form a "bisque" (hardened surface). The sheets are then laid on cables to spray the top side of the sheet with a water based porcelain "ground coat top" (primer). Sheets are sent through another IR heater and another drier then into the first high temperature oven (~1,460F). Sheets are sent through a cooling tunnel, then sprayed with a "white booth" cover coat, then sprayed with a final top coat. They're allowed to dry and wrapped with plastic as a finished product.


Their current production average is well above the regulatory of 1600 m²/day. Doug Chaffin (Purchasing) would have to be contacted for confirmation of production/day.

Simple pretreatment is pH adjustment, "one-step" polymer injection and an "Alar" system with the "clean" water discharged to the City. Facility has only recently had one instance of a nickel violation, but adjusted the pH up to successfully "drop it out". Sludge is non-haz and sent to a local landfill.

They also have a small woodworking shop attached but no wastewater is contributed. What chemicals they store en-mass are located here.

IU rep. was cordial and familiar with the pretreatment requirements.

Visit conducted by: Gilliam/Holt Date: 8/31/11



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 Date/Time of visit:
CFR 467 8/31/11 / 1:35 p.m.

Industry contacts: Harry Wagoner & Darrin Tuck

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

Additional comments: Facility's processes have not changed substantially since last audit (6/08). Raw material consists of various alloyed aluminum. End products include door and window frames "colorized" (satinized) 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 (using a water cooled heat exchanger), filtered and recirculated until spent, then sent off-site for disposal. Numerous P2 practices are being conducted at this facility.

Visit conducted by: Gilliam/Holt Date: 8/31/11



(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. Some of their product (30%) is sent to their sister plant as frames for their "wet chalk" boards.

Depending on customer specs. the pieces can just be sent out as "mill finish" (~55%); phosphatized/rinsed for either powder or wet painted (~5%) or anodized (%40%) through an acid or caustic process. This entire process line consists of 18 tanks with various acid etches/rinses, desmut bath, alkaline baths/rinses (some that are counter current cascade [ccc] flow). All 18 tanks are identified (with actual chemicals) on a chart hanging beside the process line. Five of the baths are heated. These tanks sit above a concrete pit which would catch any spills or drippage which would be captured in a sump that would be pumped to pretreatment. All anodizing wastewater is gravity fed to a 6' X 6' X 8' deep concrete pit outside the building where it is neutralized then pumped up to the pretreatment building which has been built to replace the old outside settling ponds. From the pH adjustment pit, it is pumped to a stirred holding tank w/pH adjustment 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 40 plate filter press and then filtered to the City. The dump drain also has automatic feed for pH adjustment/mixing and can also be re-pumped back thru the filter press if necessary. Flow schematics need to be revised. IU rep. was familiar with his pretreatment requirements and very cooperative.

Visit conducted by: Gilliam/Holt Date: 8/31/11

Allen A. 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 x-250

Type of industry: Al & Zn Die casting
CFR 464

Date/Time of visit:
8/31/11 / 2:55 p.m.

Industry contacts: Michael Gardner - Maintenance Planner/
Michael McEntire & Mark Piper Scheduler

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

Additional comments:

Facility die casts Al into BBQ grills and other products. Facility now Zn die casts various parts for outside (some automotive) customers. Currently, there are 27 Zn die casting machines (9 "Techmiers" which are automated, self-contained and produce negligible wastewater) and about 30 die cast machines. IU rep indicated this water is from the spraying of the open molds for cooling and anti-seize mixture application. Facility is ISO 14001 certified.

Visit conducted by: Gilliam/Holt Date: 8/31/11

Alan 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 Industries

Additional comments: Fresh water vibratory finishing w.w. is float controlled, pumped out and sent to pretreatment. The ceramic media causes the milky color in the wastestream. The Al die casting includes a spray of water on the open molds to cool them and apply the anti-seize mix. Each die cast machine is surrounded by a grated "ditch" which captures any overspray and float-controlled pumped to the holding tank when necessary. 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 coagulants are added to increase the pH and help break the solids out. Then it is pumped to a clarifier where polymers and air are injected 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. Treated wastewater is then discharged to the City through an ISCO 4230 bubble calibrated flow meter which is calibrated 1/yr. Time composite samples are taken by a cooled ISCO sampler. The major chemicals storage area is close to the stations in which they are used. 55 gallon drums and totes of virgin and spent "die slick, heat slick, plunger slick" and hydraulic oil were noted. Preventative maintenance is conducted on every piece of equipment in the building (~4,200 pieces of equipment).

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

Building is built to contain any major spills. Facility rep. was familiar with his pretreatment requirements.

Adequate sampling site.

Visit conducted by: Gilliam/Holt Date: 8/31/11



(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: Al Die Cast/Metal Date/Time of visit:

Finishing/Fe & Steel CFRs 464/433/420 9/1/11 / 8:30 a.m.

Industry contacts: Kathy Slay, Operations Mgr./Kathy Roberson,
Safety & Env./Todd Allen, W.W. Operator

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

*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 the 6/08 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. The 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. Production is down ~30% from previous years. The die cast department consists of 5 die cast machines and a vibratory tumbler. The anti-seize "lube" is hand sprayed onto the open mold with insignificant drippage.

Visit conducted by: Gilliam/Holt Date: 9/1/11



PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Harrison NPDES #: AR0034321
Industry name: ADC (Anchor Die Cast)

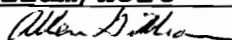
Additional comments: Preventive maintenance is conducted weekly. The rinse after ball burnishing (steel shot media) uses a non-hazardous industrial soap. Its w.w. is then sent to the equalization tank. The die cast lube, oil/grease and red oil (water, glycol hydraulic) drains via a trench to the sump tank. The sump level is maintained by a float level switch that operates an m2 air diaphragm pump, used to transfer effluent to the P1 holding tank. The sump tank has an Abanaki oil and grease metal belt separator/skimmer to remove oil and grease. That waste oil/grease is sent off-site. The P1 holding tank (1000 gal) has an overflow line (gravity) to the P2 destruct tank. The effluent level is maintained by float level switch that operates a pump to transfer effluent to tank P2 (phenol destruct) for treatment. When a 2000 gallon level is reached, the pH is adjusted to 9.4 using hydrated lime while running mixer. When pH is correct potassium permanganate is added and mixing continues until ORP meter reaches 3475 milli-volts, (effluent turns deep purple in color) phenol destruct is complete and effluent is pumped to equalization tank. The galvanizing process still consists of sending steel hardware through a caustic bath/water rinse, pickling (sulfuric acid), another caustic (rinse) bath, pre-flux, and then hot-dip coating (Zn galvanized). The parts are then sent to a quench tank for cooling. The quench water is now re-circulated to the flux tank therefore no water is sent to the equalization tank.

The powder-coating process is a 5 stage phosphatizing process, although only 4 stages are used, with filters for each stage. The cleaning agent used is Fe phosphoric acid and sodium xylene sulfonate in stages 1 and 3 followed by a fresh water rinse. The water from the powder coating process is sent to the equalization tank. The sampling point is covered and the sample is taken using a glass container the contents of which is poured into the sampling containers provided by American Interplex. Chemicals are hauled in on an as needed basis so there is very little storage.

It was later agreed to have their flow meter calibrated using the 5 gallon bucket/stop watch method.

Facility has typical metals' pretreatment via chemical precipitation with pH adjustment, polymers and coagulants, Lamella clarifier with sludge pumped into a separate tank then through a filter press. Adequate sampling point and procedures.

Visit conducted by: Gilliam/Holt Date: 9/1/11



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 HAZARDOUS. NO COMMERCIAL GREASE OR ANYTHING THAT WILL UPSET THE WASTEWATER TREATMENT WILL BE ALLOWED.

40CFR 403.5

(a)(1) *General prohibitions.* A User may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference. These general prohibitions and the specific prohibitions in paragraph (b) of this section apply to each User introducing pollutants into a POTW whether or not the User is subject to other National Pretreatment Standards or any national, State, or local Pretreatment Requirements.

(2) *Affirmative Defenses.* A User shall have an affirmative defense in any action brought against it alleging a violation of the general prohibitions established in paragraph (a)(1) of this section and the specific prohibitions in paragraphs (b)(3), (b)(4), (b)(5), (b)(6), and (b)(7) of this section where the User can demonstrate that:

(i) It did not know or have reason to know that its Discharge, alone or in conjunction with a discharge or discharges from other sources, would cause Pass Through or Interference; and

(ii)(A) A local limit designed to prevent Pass Through and/or Interference, as the case may be, was developed in accordance with paragraph (c) of this section for each pollutant in the User's Discharge that caused Pass Through or Interference, and the User was in compliance with each such local limit directly prior to and during the Pass Through or Interference; or

(B) If a local limit designed to prevent Pass Through and/or Interference, as the case may be, has not been developed in accordance with paragraph (c) of this section for the pollutant(s) that caused the Pass Through or Interference, the User's Discharge directly prior to and during the Pass Through or Interference did not change substantially in nature or constituents from the User's prior discharge activity when the POTW was regularly in compliance with the POTW's NPDES permit requirements and, in the case of Interference, applicable requirements for sewage sludge use or disposal.

(b) *Specific prohibitions.* In addition, the following pollutants shall not be introduced into a POTW:

(1) Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;

(2) Pollutants which will cause corrosive structural damage to the POTW, but in no case Discharges with pH lower than 5.0, unless the works is specifically designed to accommodate such Discharges;

(3) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;

(4) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW;

(5) Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds 40 °C (104 °F) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits;

(6) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

(7) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

(8) Any trucked or hauled pollutants, except at discharge points designated by the POTW.

Discharge point shall be where influent enters the WWTP (headwork's).

Kleen Rite will only discharge contents with an authorized Harrison WWTP employee witnessing the event.

This agreement may be cancelled by the City of Harrison WWTP for any reason at any time.

This _____ day of _____ 20__

I certify under penalty of law all provisions of this agreement will be followed and upheld.

Representing Kleen Rite Septic (print & sign)

Representing City of Harrison WWTP (print & sign)

Attachment A-2

APPLICATION FOR PERMIT
FOR DISCHARGE OF INDUSTRIAL WASTES TO
HARRISON SEWAGE WORKS

AP

1. FIRM NAME: Claridge Extrusions Date: April 19, 2010
 ADDRESS: 219 Industrial Park Road
Harrison, AR 72601
 PHONE: (870) 743-2200

2. Standard Industrial Classification Code Number(s): 3354; 3471

3. List other environmental control permits held at this time: Air Permit; Storm-water Permit; Waste Water Permit

4. Quantity of Wastewater:	Projected for Next Five (5) Years (in Gallons)	
Discharged to Harrison Sewer	Average Daily (30 Day)	Maximum Daily (1 Day)
a. Process Wastewater from <u>Anodize</u> Operation	<u>25,000</u>	<u>50,000</u>
b. Process Wastewater from _____ Operation	_____	_____
c. Domestic Wastewater from Sanitary Sewer	<u>1,000</u>	<u>2,000</u>
d. Noncontact Cooling Water	<u>5,000</u>	<u>50,000</u>
e. Total Wastewater Discharged to Public Sewage Works	<u>31,000</u>	<u>102,000</u>

List Periodic or Seasonal Variations: Noncontact cooling may be used
in May, June, July, August and September

5. Wastewater Pollutant Parameters and Concentrations:

a. Conventional Pollutants - In the spaces below, indicate the measured (or projected for new industry) average and maximum value of each of the listed wastewater pollutants.

Parameter	Concentration	
	Average Daily (30 Day)	Maximum Daily (1 Day)
Biochemical Oxygen Demand (5 Day), mg/l ¹	_____	_____
Total Suspended Solids, mg/l ¹	_____	_____
pH - pH Units ²	<u>8.0</u>	<u>6.0 - 10.0</u>
Oil & Grease, mg/l ³	<u>3.7</u>	<u>100</u>
Temperature, degrees F	_____	<u>150°</u>

¹ Maximum average may be 300 mg/l without paying surcharge.
² 5.5 to 9.5.
³ Maximum 100 mg/l for one day.

6. Attach sketch(es) of general plant process and waste line layouts, including location of floor drains. Include any existing or proposed pretreatment systems and locations and sizes of all existing and proposed connections to the Harrison sewer system. Also include details of proposed monitoring facilities.

See attached sketches

7. a. Brief description of the nature of the manufacturing process or commercial activities at the plant: Extrude, fabricate, paint and anodize custom aluminum extrusions. Extrusion is the application of pressure to a billet of aluminum, forcing the aluminum to flow through a die orifice. Fabrication is the cutting, notching, drilling, bending & forming of the extrusion. Painting is by two methods: electrostatic and powdercoating. Anodize is the cleaning, etching, and chemical and electrical treatment of the extrusions in a series of process baths and rinses to produce a decorative and protective finish to the extrusion.

b. General description of products produced by type and amount:
Custom aluminum extrusions including fabricating, painting and anodizing:
Custom Aluminum Extrusions 6,500,000 lbs.
Fabrication 500,000 lbs.
Paint 201,700 lbs.
Anodize 2,300,000 lbs.

c. General description of type and amount of raw materials processed:

Aluminum Billets 8,750,000 lbs.

8. Hours of operation of plant and actual or proposed hours of operation of pretreatment system:

24 hours per day

9. Is your manufacturing or commercial operation(s) subject to National Categorical Pretreatment Standards established under 40 CFR 403.5?

Yes X No _____

Applicable National Categorical Standard(s): 40 CFR 467

10. Are the applicable National Categorical Pretreatment Standards and the Harrison local discharge limitations being met on a consistent basis?

Yes X No _____

Remarks: _____

Aze

11. If the applicable wastewater discharge limitations are not being met consistently, is additional pretreatment and/or alteration of current operation and maintenance (O & M) required by your firm to meet the limitations?

Yes _____ No _____

Remarks: Discharge limitations are being met.

12. If additional pretreatment and/or O & M are required to meet the National Categorical applicable discharge limitations, submit the shortest schedule by which your firm will provide such additional pretreatment.

- a. The schedule shall contain a list of the major events leading to compliance. The expected dates of completion of such events shall also be given.
- b. The completion dates of any two successive events shall not exceed nine months.
- c. Within 14 days after the completion of each event, the Industrial User shall submit a progress report to the General Manager indicating:
 - . date the event was completed
 - . if the event is not completed as scheduled, the reason for the delay
 - . the expected date of completion, and
 - . steps taken by the Industrial User to return to the established schedule.

I, the undersigned applicant, being the authorized representative of the herein named company, do hereby request a permit to use or to continue to use an industrial sewer connection at the location indicated herein and do agree to comply with applicable provisions of Harrison City Code regulating the use of public sewage works.

Signature of Applicant *John Hardcastle* Date *April 15, 2010*
Name of Signee John Hardcastle Title of Signee Vice President Extrusions
(Please Print) (Please Print)

Name and phone number of person to contact regarding permit information: Harry Wagoner (870) 743-2200 EXT 234

CORPORATE ACKNOWLEDGMENT

STATE OF ARKANSAS)
COUNTY OF Boone)

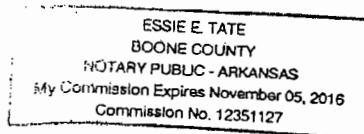
Before me, the undersigned authority, on this day personally appeared John Hardcastle of Claridge Extrusions

a corporation, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this 19th day of April, 2010.

Essie E. Tate
Notary Public in and for Boone
County, Arkansas

My commission expires 11/05/2016



13. Corporate Headquarters

Company Name Claridge Products and Equipment, Inc.

Address P. O. Box 910 (601 Hwy 62-65 South)

Harrison, AR 72602-0910 (72601)

Telephone 870-743-2200

14. How was the data obtained in # 4 ? Flow Meters etc. ?

Flow meter records water used in anodize operation.

Also recorded is water discharged to sewer. Domestic

waste water is estimated from number of personnel.

Noncontact water used in heat exchangers is estimated

based on gallons per minute and time needed.

Attachment No. 1

PRIORITY POLLUTANTS

Volatile Compounds

002	Acrolein	088	Vinyl Chloride
004	Benzene	003	Acrylonitrile
006	Carbon Tetrachloride	047	Bromoform
051	Chlorodibromomethane	007	Chlorobenzene
019	2-Chloroethylvinyl Ether	016	Chloroethane
048	Dichlorobromomethane	023	Chloroform
010	1,2-Dichloroethane	013	1,1-Dichloroethane
032	1,2-Dichloropropane	029	1,1-Dichloroethylene
038	Ethylbenzene	033	1,3-Dichloropropylene
045	Methyl Chloride	046	Methyl Bromide
015	1,1,2,2-Tetrachloroethane	044	Methylene Chloride
086	Toluene	085	Tetrachloroethylene
011	1,1,1-Trichloroethane	030	1,2-Trans-Dichloroethylene
087	Trichloroethylene	014	1,1,2-Trichloroethane

Acid Compounds

024	Chlorophenol	031	2,4-Dichlorophenol
034	2,4-Dimethylphenol	060	4,6-Dinitro-O-Cresol
059	2,4-Dinitrophenol	057	2-Nitrophenol
058	4-Nitrophenol	022	P-Chloto-M-Cresol
064	Pentachlorophenol	065	Phenol
021	2,4,6-Trichlorophenol		

Base/Neutral Compounds

001	Acenaphthene	077	Acenaphthylene
078	Anthracene	005	Benzidine
072	Benzo(a)Anthracene	073	Benzo(a)Pyrene
074	Benzo(b)Fluoranthene	079	Benzo(ghi)Perylene
075	Benzo(k)Fluoranthene	043	Bis(2-Chloroethoxy)Methane
018	Bis(2-Chloroethyl)Ether	042	Bis(2-Chloroisopropyl)Ether
017	Bis(chloromethyl)Ether	041	4-Bromophenyl Phenyl Ether
066	Bis(2-Ethylhexyl)Phthalate	020	2-Chloronaphthalene
067	Butyl Benzyl Phthalate	076	Chrysene
040	4-Chlorophenyl Phenyl Ether	025	1,2-Dichlorobenzene
082	Dibenzo(a,h)Anthracene	027	1,4-Dichlorobenzene
026	1,3-Dichlorobenzene	070	Diethyl Phthalate
028	3,3-Dichlorobenzidine	068	Di-N-Butyl Phthalate
071	Dimethyl Phthalate	036	2,6-Dinitrotoluene
035	2,4-Dinitrotoluene	037	1,2-Diphenylhydrazine (as Azobenzene)
069	Di-N-Octyl Phthalate	009	Hexachlorobenzene
039	Fluoranthene	053	Hexachlorocyclopentadiene
080	Fluorene	083	Indeno(1,2,3-cd)Pyrene
052	Hexachlorobutadiene	055	Naphthalene
012	Hexachloroethane	061	N-Nitrosodimethylamine
054	Isophorone	062	N-Nitrosodiphenylamine
056	Nitrobenzene	084	Pyrene
063	N-Nitrosodi-N-Propylamine	008	1,2,4-Trichlorobenzene
081	Phenanthrene		

PRIORITY POLLUTANTS (Continued)

Pesticides and PCBs

089 Aldrin	104 Gamma-BHC
102 Alpha-BHC	105 Delta-BHC
103 Beta-BHC	091 Chlordane
092 4,4' DDT	093 4,4' DDE
094 4,4'-DDD	090 Dieldrin
095 Alpha-endosulfan	096 Beta-Endosulfan
097 Endosulfan Sulfate	098 Endrin
099 Endrin Aldehyde	100 Heptachlor
101 Heptachlor Epoxide	106 PCB-1242
107 PCB-1254	108 PCB-1221
109 PCB-1232	110 PCB-1248
111 PCB-1260	112 PCB-1016
113 Toxaphene	

Metals and Cyanide

114 Antimony	115 Arsenic
117 Beryllium	118 Cadmium
119 Chromium	120 Copper
122 Lead	123 Mercury
124 Nickel	125 Selenium
126 Silver	127 Thallium
128 Zinc	121 Cyanide

Miscellaneous

129 2,3,7,8-Tetrachlorodibenzo-P-Dioxin (TCDD)
116 Asbestos

Attachment A-3

INDUSTRIAL WASTES DISCHARGE PERMIT

Copy

PERMIT NO. 001-10

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 19, 2010 supplemented by review of discharge monitoring reports submitted by Claridge Extrusions past 7 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 October 11, 2010


This permit and authorization to discharge shall expire at midnight October 11, 2015.

This permit is not transferable to persons, companies, or processes other than to which it is originally used.

Signed this 11th day of October, 2010



Arnold Rogers
Wastewater System Manager



Frank Gelanis
Director of Public Works

PERMIT NO. 001-10

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:

<u>Pollutant Parameter Average</u>	<u>Maximum for Any One Day</u>	<u>Maximum for Monthly</u>
Chromium (T), mg/l	0.68 ¹	0.28 ¹
Cyanide (T), mg/l	0.48 ¹	0.20 ¹
Zinc (T) mg/l	2.20 ¹	0.97 ¹
TTO, mg/l	1.08 ¹	
Alternate Oil & Grease, mg/l	80.5 ^{1,2}	40.3 ^{1,2}
pH, S.U.	5.0-10.0 ³	
Oil & Grease, mg/l	100 ^{3,4}	
Temperature	150°F (66°C) ^{3,5}	
Daily Flows, gpd Commingled Process Wastes from Extrusion, Phosphatizing 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 as follows:

A-3b

<u>Wastestream Number</u>	<u>Regulated By</u>	<u>Description</u>	<u>Avg. Daily flow</u>
1	40 CFR 467.35 Al. Extrusion Phosphatizing, & Anodizing	Commingled Al. Extrusion Phosphatizing, & Anodizing Wastewater	12,668 gpd
Average Total Flows at Outfall No. 001			12,668 gpd

- 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.

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

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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. If composite samples cannot be performed over a 24-hour period as required by the permit due to lack of effluent from the pretreatment process, the times that the samples were collected must be state on the chain of custody.
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.

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PERMIT NO. 001-10

PART III – CONDITIONS OF PERMIT

1. Claridge Extrusions shall pay to the City of Harrison the amount of \$_____, 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. (870) 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

representative, Environmental Protection Agency (EPA) inspectors, and Arkansas Department of Environmental Quality (ADEQ) inspectors shall have access to production, materials storage and wastewater pretreatment areas of the Claridge Extrusions plant. Such access shall include ready access to all parts of the premises for the purpose of inspection, sampling, records examination and copying, and the performance of any additional duties. Claridge Extrusions shall retain for a minimum of three years any records of waste discharge monitoring activities and results and shall make such records of monitoring available for inspection and copying by the Director of Public Works or his designated representative. Access shall be during production and/or cleanup shifts. Upon presentation of suitable identification, the Director of Public Works or his designated representative, EPA inspectors, and ADEQ inspectors shall be permitted to enter immediately for performing the above duties.

8. This permit may be reopened by the City of Harrison any time during the effective duration for revisions to discharge limitations, monitoring and/or reporting requirements or conditions.
9. Provided that Claridge Extrusions has submitted an acceptable application for renewal at least six months prior to the expiration date set forth on the permit cover sheet, this permit shall remain in effect until the City of Harrison has either issued a renewal permit or has notified the permittee in writing that the permit will not be renewed.
10. Claridge Extrusions shall be subject applicable civil and criminal penalties for violations of pretreatment standards and requirements, provisions, and conditions of this permit as provided for by Arkansas State Statutes and the Harrison Code or Ordinances.
11. As defined by Section 10.08.03 (17) of the Harrison Municipal Code, the Director of Public Works or Public Works Director, where the stated in this permit shall also mean "or his duly appointed or authorized representative".
12. The City of Harrison can terminate the permit at any time for any reason.
13. The industrial user shall not bypass their pretreatment operation at anytime for any reason.
14. Industry users shall not dilute their wastewater.

FACT SHEET

2010 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: (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 seven months of record keeping.

Aluminum Sections Extruded: 0.0228856 M Off-lb/Day

Aluminum Sections Anodized: 0.0095547 M Off-lb/Day

Aluminum Sections Phosphatized: 0.002355 M Off-lb/Day

d. Description of Pollution Abatement Facilities

Wastewater from aluminum extruding, aluminum anodizing and aluminum phosphating 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 12,668 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 seven 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 12,668 gpd

Total Average Pretreated Wastewater

Reported at Outfall No. 001 12,668 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.

<u>Parameter</u>	<u>Concentration mg/l</u>	
	<u>Daily Maximum</u>	<u>Monthly Average</u>
Chromium (T)	0.68	0.28
Cyanide (T)	0.48	0.20
Zinc (T)	2.20	0.97
TTO's	1.08	
Alternate O&G	80.6	40.3

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

<u>Parameter</u>	Concentration mg/ Daily <u>Maximum</u>	Monthly <u>Average</u>
Oil & Grease	100	
pH	5.0 –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 or 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 REQUIREMENTS

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
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 Extruding									
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 Phosphatizing	1.858	0.764	1.304	0.544	6.22	2.618	2.948		218.6	109.4

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

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Table 2. Production Data

Month	Extrusion			Anodizing			Phosphatizing					
	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
January	419293	27321	20965	20	174237	14058	8712	20	19603	4141	1782	11
February	378060	30194	18903	20	127384	8366	6369	20	37676	10015	3768	10
March	482477	29763	20977	23	160865	9648	6994	23	26281	7629	2389	11
April	490576	28770	22299	22	249586	14376	11345	22	31697	6504	2264	14
May	499798	28929	24990	20	233553	13959	11678	20	21081	4597	2635	8
June	588139	35485	26734	22	236212	15205	10691	22	14500	3654	1450	10
July	557287	29092	25331	22	232980	15725	11094	21	28567	5349	2197	13

Table 3. Daily Production Averages

Process	Average (M off Lbs) /day
Extrusion	0.0228856
Anodizing	0.0095547
Phosphatizing	0.002355

Table 4. Water Usage (gallons).

Month	water usage	water discharge d to City	average daily discharge
January	331800	328000	10581
February	377500	371800	11994
March	402600	397200	12813
April	400800	396200	12781
May	433500	426800	13768
June	428800	423700	13668
July	410600	405300	13074

12668 : average daily discharge

NOTE: All data found in these tables is based on Claridge Products Monthly Report (1/10-7/10)

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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
Chrom um	0.00343	0.00140	0.06799	0.02798	0.00438	0.00180	0.07580	0.03117
Cyanide	0.00224	0.00094	0.04785	0.01995	0.00307	0.00128	0.05316	0.02217
Zinc	0.00112	0.00481	0.22778	0.09589	0.01465	0.00617	0.24355	0.10686
TTO'S	0.00526		0.10793		0.00694		0.12014	
Alternate O&G	0.41194	0.20139	7.99921	4.00151	0.51480	0.25764	8.92595	4.46054

Table 6. Concentration Limits without dilution

	Max 1-Day, mg/l	Max Monthly Avg, mg/l
Chromium	0.71744	0.29504
Cyanide	0.50319	0.20984
Zinc	2.30523	1.01145
TTO'S	1.13709	
Alternate O&G	84.48379	42.21889

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

Table 7. Concentration Limits with dilution

	Max 1-Day, mg/l	Max Monthly Avg, mg/l
Chromium	0.68372	0.28117
Cyanide	0.47954	0.19997
Zinc	2.19688	0.96391
TTO'S	1.08364	
Alternate O&G	80.51305	40.23460

A-3p

Sample Calculations Permit 001

Chromium:

Extrusion Mass Limits Max 1- Day:

Mass Limit = pollutant regulation* average production

Mass limit = (0.15 lbs/M-lbs)*(0.0228856 M-lbs/day)

Mass Limit= **0.003432 lbs/day**

Extrusion Mass Limits Max Monthly Average:

Mass Limit = pollutant regulation* average production

Mass limit = (0.061 lbs/M-lbs)*(0.0228856 M-lbs/day)

Mass Limit= **0.001394 lbs/day**

Anodizing Mass limits Max 1-Day:

Mass Limit = pollutant regulation* average production

Mass limit = (7.116 lbs/M-lbs)*(0.0095547 M-lbs/day)

Mass Limit= **0.067990 lbs/day**

Anodizing Mass limits Max Monthly Average:

Mass Limit = pollutant regulation* average production

Mass limit = (2.928 lbs/M-lbs)*(0.0095547 M-lbs/day)

Mass Limit= **0.027976 lbs/day**

Phosphatizing Mass limits Max 1-Day:

Mass Limit = pollutant regulation* average production

Mass limit = (1.858 lbs/M-lbs)*(0.002355 M-lbs/day)

Mass Limit= **0.004376 lbs/day**

Phosphatizing Mass limits Max Monthly Average:

Mass Limit = pollutant regulation* average production

Mass limit = (0.764 lbs/M-lbs)*(0.002355 M-lbs/day)

Mass Limit= **0.001799 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 = **0.075799lbs/day**

Combined Mass Limit of Max Monthly = **0.031169 lbs/day**

Concentration Limits:

Chromium Concentration Limit Max 1-Day:

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

$$\text{Concentration} = \frac{(0.075799 \text{ lb/day})}{(0.012668 \text{ Mgalpd} * 8.34)}$$

$$\text{Concentration} = 0.717890 \text{ mg/l}$$

Chromium Concentration Limit Max Monthly Average:

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

$$\text{Concentration} = \frac{(0.031169 \text{ lb/day})}{(0.012668 \text{ Mgalpd} * 8.34)}$$

$$\text{Concentration} = 0.295022 \text{ mg/l}$$

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):

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

Where:

C_T = Alternate Combined Limit by the combined waste stream formula

C_i = The Categorical Pretreatment Standard 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:

$$C_T = \frac{(0.717890 \text{ mg/l} * 0.012668 \text{ Mgalpd}) * (0.012668 \text{ Mgalpd} - .0006 \text{ Mgalpd})}{(0.012668 \text{ Mgalpd}) * 0.012668 \text{ Mgalpd}}$$

$$C_T = 0.68388 \text{ mg/l}$$

Chromium Max Monthly Average:

$$C_T = \frac{(0.295022 \text{ mg/l} * 0.012668 \text{ Mgalpd}) * (0.012668 \text{ Mgalpd} - .0006 \text{ Mgalpd})}{(0.012668 \text{ Mgalpd}) * 0.012668 \text{ Mgalpd}}$$

$$C_T = 0.28117 \text{ mg/l}$$

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.

CITY OF HARRISON ARKANSAS INDUSTRIAL INSPECTION SHEET

NAME OF INDUSTRY Claridge Extrusion's
ADDRESS 219 Industrial Park Rd. Harrison, AR 72601
Phone# 870-743-2200

Name & Title of City Representatives (print & sign) copy
Rick Maple PT Coordinator

Name & Title of Industry Representatives (print & sign)
Harry Wagoner
Harry Wagoner

Years at present location 4 1/2

Inspection date/time 0900 12-17-10

Industrial waste discharge permit# 001-10
Sic code(s) 3354 3471

Nature of business Extrude ALUMINUM
ANODIZE ALUMINUM

Total employees each shift. Average. (including office)
First 53 Second 15 Third 1

Number of days per week 5 - 6 IF Schedule dictates

Water source. City HARRISON Other _____

Water usage: gallons per month _____ or gallons per day 16,500 gal.
Process 16000/day Domestic 500
Other _____
Total to sewer 16,500

Products produced Aluminum Trim

Raw materials used Aluminum billets, Thinners
Paints

Chemicals used Sulfuric Acid., Sodium Hydroxide
Paints, Thinners

Chemical storage locations As marked on attached.

Waste storage locations Paint house (waste thinner)
20yd dumpster (waste anodize operation)

How waste disposed of waste thinner - Rinco pick up
Anodize Sludge - Methuen Sanitation to Landfill

Floor drain location & destination (attach updated drawing with sign & date)
As Attached.

Verification of production rate 67% (products shipped)

Verification of flow rate, include locations. (meters? Accurate estimates?
Verifiable devices?)

Water meter is checked for accuracy.
Using 2.5 gal buckets & check reading

Pretreatment:

Permit violation (current year) None

Location outfall #1 North Side Anodize IN manhole
(Sample point)

Location outfall #2 NONE

Pretreatment Process (attach written procedure with sign & date)
Attached.

Contract laboratory name ENVIRONMENTAL Services
Address 1107 CENTURY Street Springdale, AR.
Telephone # _____

Has there been any changes in processes, equipment layout, chemical's since the last inspection?
NO

What have you done in the last year regarding P2 (Pollution Prevention)
None

Evaluation of self-monitoring equipment & techniques
IN PLACE & WORKING

Inspection summary BUSINESS HAS BEEN DOWN IN 2010

END OF REPORT

Date: 09-05-06

To: All Permitted Industries

From: Rick Maples

Subject: Slug Discharges

Per 40CFR.8 (f)(2)(vi) by October 14 2006 this office must have on file a Slug Discharge Evaluation on each permitted industry.

A Slug Discharge is any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge which has a reasonable potential to cause interference or pass through, or in any other way violate the POTW's regulations, local limits or permit conditions.

In others words can anything get out of your plant into the sewer system that should not.

Examples to look at are:

In case of loss of power can anything by pass pretreatment and go directly into the sewer?

Are there automatic shut offs in some of your chemical containers that could fail and allow all the chemicals to run continusly and go into the sewer all at once?

If a chemical tank ruptures or spills over is there a floor drain the chemicals can go into and then go directly to the sewer system?

I know some of you have no floor drains that go directly to the sewer and bathrooms and drinking fountains only go directly to the sewer.

Also some of you have a pit or tank that all non domestic waste water goes to for treatment and cannot by pass pretreatment. If this is the case so state and back up with drawings etc.

When your Slug Discharge evaluation is complete, please call me for us to meet, go over and disuss.

This task must be COMPLETED AND ON FILE IN MY OFFICE BY October 14 2006.

Your cooperation is appreciated in this very important matter.

If you have any questions, please call me.

Sincerely,

Rick Maples-Pretreatment Coordinator

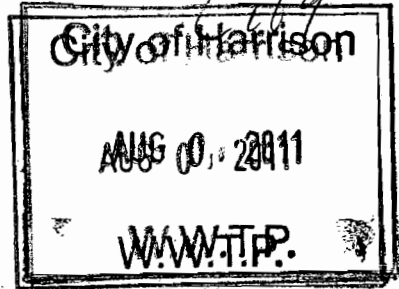
Cc Arnold Rogers-Wastewater Systems Manager
Allen Gilliam-ADEQ Pretreatment Coordinator

Attachment H-6

Claridge Extrusion Products Report of Anodized Production

Claridge Extrusions
219 Industrial Park Road
Harrison, Arkansas 72601

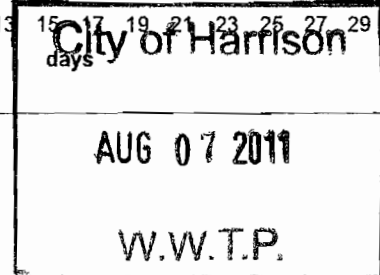
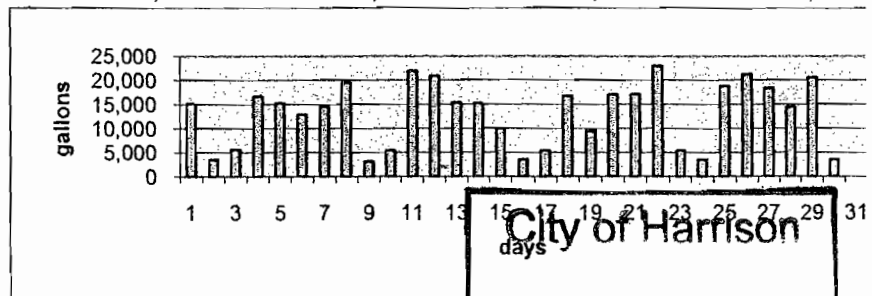
Effluent Permit # 001
Daily Production



Date of Sample: 7/6/2011

Production Date	Pounds Extruded	Pounds Anodized	Pounds Phosphatized	Water Usage gal.	To City Sewer gal.
Day 1	15425	5,735		15,200	14,900
Day 2				3,500	3,500
Day 3				5,600	5,500
Day 4				16,700	16,400
Day 5	27,285	5,627		15,300	15,000
Day 6	25,243	7361		12,900	12,600
Day 7	21,920	8252	2,022	14,600	14,200
Day 8	25,241	6787	3235	19,500	19,500
Day 9				3,100	3,000
Day 10				5,500	5,400
Day 11	24,613	4019	2,743	21,900	21500
Day 12	26,312	5091	2,761	20,900	20,600
Day 13	25,992	5923		15,400	15,100
Day 14	26,339	7655	1331	15,200	14,800
Day 15	26,841	4752		10,000	9,900
Day 16				3,500	3,500
Day 17				5,400	5,300
Day 18	26,170	7979	2,053	16,800	16,500
Day 19	29,822	14463		9,500	9,400
Day 20	34,029	10522	129	17,100	16,800
Day 21	29,421	10236	1,995	17,100	16,800
Day 22	29,820	10958		23,000	21,900
Day 23				5500	5,300
Day 24				3,500	3,400
Day 25	25,465	13,488	3,510	18,800	18,500
Day 26	33,854	14049	1,750	21,200	20,800
Day 27	30,355	12427	1,975	18,400	18,100
Day 28	24,097	12213	1,005	14,400	14,100
Day 29	25,795	5394	13545	20,600	20,400
Day 30				3,500	3,500
Day 31					
Monthly Total	534,039	172,931	38,054	393,600	386,200
Daily Maximum	34,029	14,463	13,545	23,000	21,900
Daily Average	26,702	8,647	2,927	13,120	12,873

Days Extruded 20
Days Anodized 20
Days Phosphatized 13



Claridge Products Certification of Monitoring Reports
Claridge Extrusions
219 Industrial Park Road
Harrison, Arkansas 72601

Effluent Permit # 001
Monitoring Certification


Date of Sample:

7/6/2011

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 the 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:



Harry C. Wagoner

Title:

Plant Supt.

A-6b

Environmental Services Company, Inc.

RECEIVED

AUG 01 2011

Corporate Office
13715 West Markham
Little Rock, AR 72211
Tel. (501) 221-2565 Fax (501) 221-1341

Northwest Arkansas Branch
1107 Century Avenue
Springdale, AR 72781
Tel. (479) 750-1170 Fax (479) 750-1170

Control Number: 1107020087
Customer Name: CLARIDGE EXTRUSION PLANT (ANNOD)
Customer Number: 997
Report Date: 07/28/11
Composite Date: 07/06/11 - 07/07/11
Sample Time: 0800-0800/1100
Sample Type: COMP/GRAB
Sample From: ANNODIZE
Collected By: JBD
Delivery By: SJI
Work Order:
Purchase Order: EX 101557

Analysis		Parameter		Result	Notes	Quantity	Method	Quality Assurance	
Date	Time	By						Precision % RPD	Accuracy % Recover
07/28	1005	MDR	Cyanide Total (as CN)	< 0.0100	mg/L		SM 18th 4500-CN E	0.00	93.2
07/14	1600	BDC	Oil & Grease, Total	< 1.5	mg/L		EPA 1664A	5.90	96.0
07/06	1000	HW	pH	8.3	S.U.		SM 18th 4500-H+ B		
07/14	1043	BGW	Chromium	0.00700	mg/L		EPA 200.7	0.62	96.7
07/14	1043	BGW	Zinc	0.0620	mg/L		EPA 200.7	2.82	93.7
07/06	1000	HW	Temperature (°F)	84.0	°F		SM 18th 2550B		

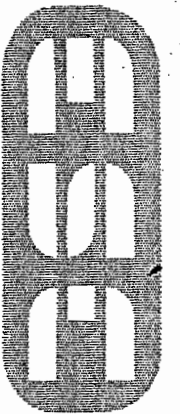
* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Richard Brown
Environmental Services Co., Inc.

A-6 <

Environmental Services Company, Inc.
 Corporate Office
 13715 West Markham P.O. Box 55146
 Little Rock, AR 72211 Little Rock, AR 72215
 website: www.esclabs.com



Environmental Services Company, Inc.
 Northwest Branch
 1107 Century
 Springdale, AR 72764

Phone: 501-221-2565 Fax: 501-221-1341

Phone 479-750-1170 Fax: 479-750-1172

CHAIN OF CUSTODY

Client Information		Project Information		Requested Parameters	
Company Name:	Claridge Extrusion Plant	Permit/Project #:	EX-101557		
Address:	2119 Industrial Park Road Harrison, AR 72601	Purchase Order #:			
Telephone:	(870)743-2200	Sampler Name(s):	See Sample 1		
FAX:	(501)7431908	and Signature(s):	Paul Maxwell		
ESC Client Number:	1623				

Sample Identification		Sample Collection			Sample Containers				
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#

Medicine	1107000557	7-6-11	8:40 AM	Water	Water	Water	100 mL	None	1
Medicine		7-7-11	8:40 AM	Water	Water	Water	100 mL	None	1
Medicine		7-6-11	11:40 AM	Water	Water	Water	100 mL	None	1
Medicine		7-6-11	11:40 AM	Water	Water	Water	100 mL	None	1
Medicine		7-7-11	8:40 AM	Water	Water	Water	100 mL	None	1
Medicine		7-7-11	8:40 AM	Water	Water	Water	100 mL	None	1

Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time	Custody Seals:	In tact?
Paul Maxwell	7-7-11	8:40 AM	Paul Maxwell	7-7-11	8:40 AM	Turnaround: <input type="checkbox"/> Regular <input type="checkbox"/> Special	<input type="checkbox"/>
Relinquished By: (Signature and Printed Name)	Date	Time	Received By: (Signature and Printed Name)	Date	Time	Were samples properly preserved:	Special
Paul Maxwell	7-7-11	8:40 AM	Paul Maxwell	7-7-11	8:40 AM	Yes <input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/>

Comments: FLOW DATA
 Analyst: [Blank]
 Time: [Blank]
 Reading: [Blank]
 Units: [Blank]
 Chlorinated? Yes No
 This Document is Page ___ of ___
 Cool all samples to 4 degrees C.

A-6d

Claridge®

PRODUCTS AND EQUIPMENT, INCORPORATED
P.O. BOX 910
HARRISON, ARKANSAS 72602-0910



PHONE 743-2200
AREA CODE 501
FAX 501-743-1908

8-5-11

Harrison Water and Sewer Superintendent

Attention: *Tim Holt*

Claridge Products and Equipment, Inc. certifies that to the best of our knowledge and belief that no dumping of concentrated toxic organics into the wastewater has occurred since the filing of the last discharge monitoring report; and that no T10 has been discharged into the wastewater stream since the last report.

Very truly yours,

CLARIDGE PRODUCTS AND EQUIPMENT, INC.

Harry Wagoner

HW/ey

A-6e



copy

Slug Discharge Evaluation

January 2, 2009



1.0 INTRODUCTION

This Slug Discharge Evaluation is for the Pace Industries – Harrison, AR facility and describes the facility and the prevention of non-routine, accidental spills or non-customary batch discharge which could cause interference or “pass-through” violating the POTW’s regulations. The evaluation also addresses structural control, best management practices, housekeeping, spill prevention, and routine inspections.

2.0 FACILITY DESCRIPTION

Pace Industries – Harrison, AR is a 635,000 square foot facility and is listed under primary SIC code 3363 (NAICS code 331521). Industrial activity includes the manufacture of large thin wall aluminum die castings (i.e. barbecue grill tops & bottoms, wash machine parts, street lighting, automotive parts). All manufacturing occurs indoors.

3.0 PROCESS FLOW DESCRIPTION

- 3.1 All waste water from the production areas is treated in the Pace-Harrison water pre-treatment department before exiting to the city sewer outfall. The steam cleaning room has one drain which drains to the wastewater holding tank.

The wastewater from the die cast area is pumped to a “sand trap” screening tank (Pic. #2) inside the building. In the event of a tank failure the wastewater would be contained inside the building and not a threat to the city sewer system.

The wastewater from the ‘sand trap’ flows to a 20,000 gallon holding tank (Pic. #1) outside the building. The 20,000 gallon tank is contained by a concrete wall to prevent spillage to the grounds in the case of a tank failure or overflow. The containment area is pumped out routinely.

The 20,000 gallons will be processed over an eight hour period. At 45 gallons per minute (gpm), the wastewater pre-treatment system can handle the wastewater flow that occurs during this period.

A transfer pumps moves the wastewater from the 20,000 gallon holding tank to tank #1 inside the waste water pre-treatment department. In tank #1 (Pic. #3) a coagulant is added break the emulsion. The de-emulsified wastewater then flows to tank #2 (Pic #4) through an overflow outlet by gravity or plug flow. In the event of a tank failure of either tank #1 or #2 the wastewater would be contained by four walls of the water treatment department and would not enter the city sewer system.

The treated water exits the clarifier via plug flow at a rate of 45 gpm through an underflow / overflow baffle / weir arrangement into piping and through a spm metered flume then into sewer line which is elevated off of the floor.

The sludge collected in the sludge holding chamber of the clarifier can be processed further and dewatered by pumping the sludge with an air operated pump through a recessed plate filter press. The filter press will squeeze water out of the sludge producing a dry cake having a solids content of 35% - 45% solids. The filtrate out of the filter press will be piped to return back to the equalization tank for reprocessing.

4.0 **INVENTORY OF EXPOSED MATERIALS AND ACTIVITIES**

4.1 INDOOR STORAGE – All virgin materials (drums and totes) are stored in an area contained by block walls to prevent spillage to any internal sewer drain. Waste oils, solvents, fuels, etc. are stored in a locked-caged area in the southeast corner of the facility, contained by walls on two sides. Only authorized personnel may enter that area and handle those materials. A spill containment cabinet is located in that area.

5.0 **SIGNIFICANT SPILLS AND LEAKS**

5.1 No spills and/or leaks have occurred to date.

6.0 **PREVENTIVE MAINTENANCE AND MONTHLY INSPECTIONS**

6.1 Routine visual site inspections will be conducted monthly to identify pollutants entering the sewer drainage system and to confirm that the best management practices chosen are in place and working. The following areas will be included in the site inspections:

- Drum storage areas both virgin and waste storage areas
- Production areas
- Water storage tanks
- Water Treatment Department

7.0 **BEST MANAGEMENT PRACTICES**

7.1 GOOD HOUSEKEEPING PLAN

- 7.1.1 Maintain clean ground surface areas by using brooms, shovels, vacuum cleaners or cleaning machines.
- 7.1.2 Regularly pick up and dispose of garbage, trash materials, and litter.
- 7.1.3 Maintain equipment in proper working order.
- 7.1.4 Monthly inspection for leaks, spills or conditions that could lead to discharges of chemicals or pollutants to the city sewer system.
- 7.1.5 Train employees on spill cleanup procedures.
- 7.1.6 Conduct frequent and proper training of employees in good housekeeping techniques.

7.2 MATERIAL STORAGE PRACTICES

- 7.2.1 Provide adequate aisle space to facilitate material transfer and easy access for inspections.
- 7.2.2 Store containers, drums, and bags away from direct traffic routes to prevent accidental spills.
- 7.2.3 Store containers on pallets or similar devices to prevent corrosion of the containers which can result when containers come in contact with moisture on

the ground.

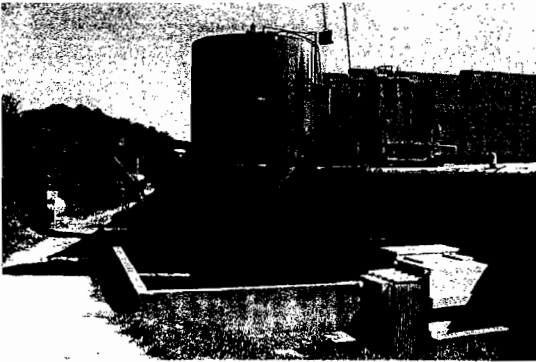
8.0 SPILL PREVENTION AND RESPONSE

8.1 In the event spill prevention measures fail the following procedure will be followed:

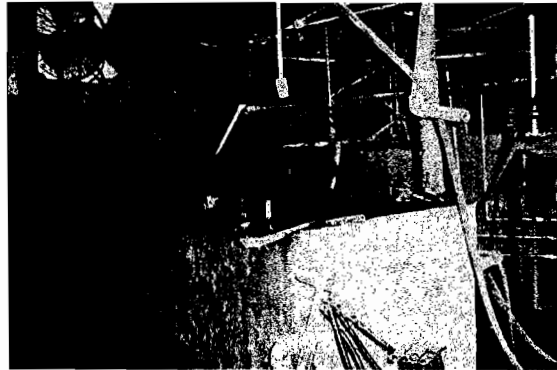
8.1.1 An employee will first notify the Safety & Environmental Coordinator.

8.1.2 The Safety & Environmental Coordinator will contact the City of Harrison Sewer Department and describe the events of the spill and quantities.

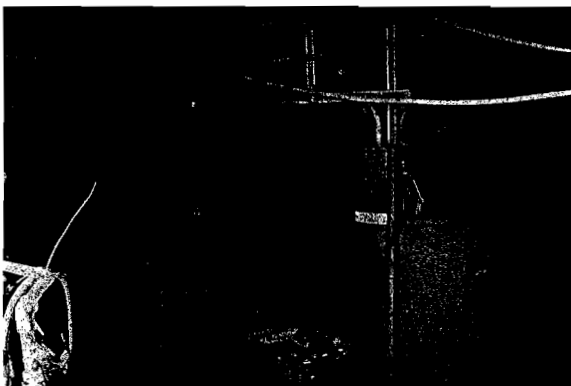
8.1.3 The Safety & Environmental Coordinator will notify the Maintenance Foreman to take immediate action to mitigate any adverse effects of spill/slug loading.



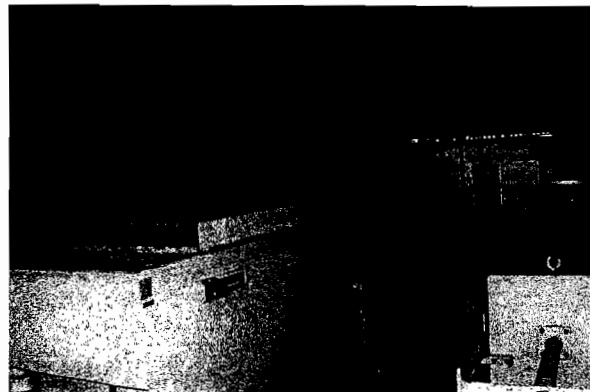
(Pic. #1) 20,000 gallon water tank



(Pic. #2) Sand Trap tank



(Pic. #3) Mixture tanks (tank #1)



(Pic. #4) Tank #2

Special Programs
Pretreatment

Significant Industrial Users (SIUs)

SIUs : 4

SIUs Without Control Mechanism : 0

SIUs Not Inspected : 0

SIUs Not Sampled : 0

SIUs in SNC with Pretreatment Standards : 0

SIUs in SNC with Reporting Requirements : 0

SIUs in SNC with Pretreatment Schedule : 0

SIUs in SNC Published in Newspaper : 0

SIUs on Schedules : 0

Violation Notices Issued to SIUs : 9

Administrative Orders Issued to SIUs : 0

Civil Suits Filed Against SIUs : 0

Criminal Suits Filed Against SIUs : 0

Categorical Industrial Users (CIUs)

CIUs : 4

CIUs in SNC : 0

Penalties

Dollar Amount of Penalties Collected : \$ 0

Industrial Users (IUs) from which Penalties have been collected : 0

Other Information

SUO Reference :

SUO Date :

Annual Pretreatment Budget : \$

Pass-Through/Interference Indicator :

Violation of IU Schedule for Remedial Measures : No

Formal Response to Violation of IU Schedule for Remedial Measures :

Local Limits

Date of Most Recent Technical Evaluation for Local Limits :

Date of Most Recent Adoption of Technically Based Local Limits :

Local Limit Pollutants :

POLLUTANTS

Removal Credits

Removal Credits Application Status : Not Applicable

Date of Most Recent Removal Credits Approval :

Removal Credits :

POLLUTANTS

Acceptance of Waste

Acceptance of Hazardous Waste : No

Acceptance of Non-Hazardous Industrial Waste : No

Acceptance of Hauled Domestic Wastes : No

Deficiencies

Deficiencies Identified During IU File Review : No

Control Mechanism Deficiencies : No

Legal Authority Deficiencies : No

Deficiencies in Data Management and Public Participation : No

Deficiencies in Interpretation and Application of Pretreatment Standards : No

Inadequacy of Sampling and Inspections : No

Adequacy of Pretreatment Resources : Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling :

Annual Frequency of Effluent Toxicant Sampling :

Annual Frequency of Sludge Toxicant Sampling :

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

Compliance Monitoring Type:

State: AR

- AFO Defined
- AFO Designation
- Aerial Photography
- Audit
- Audit (IU)

Compliance Monitoring Activity Name: *Pretreatment Audit (Allen Gilliam)*

If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method:

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	AR0034321 <input type="button" value="VALIDATE"/>	Harrison, City of		

Compliance Monitoring Dates

Planned Start Date:	<i>8/30/11</i>	Actual Start Date:	<i>8/30/11</i>
Planned End Date:	<i>9/1/11</i>	Actual End Date:	<i>9/1/11</i>

Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act

- * Programs:
- NPDES - Post Administrative Penalty Case (Settlement)
 - NPDES - Pretreatment
 - NPDES - Sanitary Sewer Overflow (SSO)
 - NPDES - Section 308 Information Requests
 - NPDES - Sludge/Biosolids

State Statute:

- * Compliance Monitoring Action Reason:
- Agency Priority
 - Citizen Complaint/Tip
 - Core Program
 - For Cause
 - Random Inspection
- * Compliance Monitoring Agency Type:
- State Contractor
 - State - Using Federal Credential
 - State
 - Regional
 - Other Federal
- Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist?: No

Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? State

If Joint, what was the purpose of the participation of the other party?

Which party had the lead?

Government Contacts

Affiliation Type	First Name	Last Name	Phone	Office	Organization
SIC Codes:			Priorities		
NAICS Codes:			OECA National Priority:		
			2009 - (CA Only) - Air Toxics - Flares		
			2009 - (CA Only) - Air Toxics - LDAR		
			2009 - (CA Only) - Air Toxics - Surface Coating		
			2009 - (CA Only) - Financial Assurance		
			2009 - (CA Only) - MP - Mining		
			Regional Priority:		
			2009 - Region 06 - Air Toxics Major Sources (O & G)		
			2009 - Region 06 - Brine Spills from Oil & Gas Operations		
			2009 - Region 06 - CD Implementation		
			2009 - Region 06 - Minor Wastewater Collection & Treatment System		
			2009 - Region 06 - Petroleum Refining		

Media Monitored

Media Monitored:

Compliance Monitoring Media Indicator

Multimedia Indicator:

Compliance Monitoring Information

Number of Days Physically Conducting Activity: *3*

Number of Hours Physically Conducting Activity: *24*

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code:

Compliance Monitoring Comments

Compliance Monitoring Comments:

User Defined Fields

1: