

# ADEQ

ARKANSAS  
Department of Environmental Quality

**SEP 03 2015**

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 July 7 through July 9, 2015. 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 from the date on this correspondence with proposed corrective actions.

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  
Jason Bolenbaugh/NPDES Inspector Supervisor

**PRETREATMENT PROGRAM AUDIT/  
POLLUTION PREVENTION ASSESSMENT**

**CITY OF HARRISON, ARKANSAS**

**NPDES PERMIT #AR0034321**

**August 28, 2015**

**PREPARED BY:**

**Allen Gilliam**

**ADEQ State Pretreatment Coordinator**

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## **LIST OF ATTACHMENTS**

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachments A-1 through A-4: Supporting Documentation

## A) INTRODUCTION

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

An audit/assessment was performed July 7<sup>th</sup> through July 9<sup>th</sup>, 2015, 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 (exit interview)

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. The City adopted an approved Pretreatment Ordinance on 12/6/11 to be consistent with the Streamlining revisions, but only parts of the rest of the Pretreatment Program have been submitted. Those parts were discovered to have errors in them and not all sections have been submitted for a complete approvable Pretreatment Program.

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 0.0256 MGD from three (3) categorical industries. Sludge is thickened, chemical conditioned with ferric chloride and vacuum dewatered before being land applied. Estimated application rate was 193 tons/yr (2014 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 three (3) 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 Attachments 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...based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards..."*

- a) During the file review it was found Pace's permit limits' basis included Zn die casting and Metal Finishing components. Pace does not have Zn die casting or any Metal Finishing core operations on site.

The City must correct Pace's permit limits to reflect its correct 40 CFR 464.15 subprocess standards using EPA's "building block" approach to arrive at equivalent concentration limits (see Atch. A-4).

- b) Permit limits could not be confirmed reviewing the other two (2) production based

industries' example limits calculations. The basis for their average production rates and flow rates were not clearly shown. In other words, a chart was not seen averaging long term flows or production.

The City must further detail its industries' permit limit calculations to be more understandable.

Ideally, these permit limits' calculations should be located in each industry's fact sheet and be discussed with the individual industry representative to ensure proper subprocesses are included and allow the industry representative to understand the basis for their limits.

- c) Anchor Die Casting's (ADC) inspection form (see Attech. A-3c) indicates "production rate or flow is substantially (+/- 20%) different from those used in calculating (permit) limits". It is EPA's rule of thumb if changes in a facility's production or process flows change +/- 20%, the facility's permit limits should be revised. The City must revise ADC's permit limits based on this substantial difference.

**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 (see Attech. A-3 for example) were not comprehensive enough to fulfill the above mentioned requirements. To wit: 1) No verification of production or regulated 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 form was adequate, but answers were vague, or non-existent in areas regarding evaluation of sources of regulated wastewater, description of manufacturing processes, chemical handling and the IU's pretreatment system.

More narrative needs to be included to explain in better detail these areas' evaluations. Simple observations regarding housekeeping, leaks, rust, cracked welds on work tanks, etc. should be included. Once a comprehensive inspection form is completed, it could then be used as a template for future inspections making revisions as necessary.

Once requirement #3 (below) is met, the inspection forms can state, "process narrative and wastewater schematics are located in the IU's file kept by the City" shortening the inspection form. Then, only changes to the processes (and any apparent problems with O&M) and wastewater flow changes could be discussed on the inspection form.

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

**3) Under CFR 403.12(b)(3)** "Reporting requirements for industrial users upon effective date of

categorical pretreatment standard—baseline report...Description of operations. The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes.”

During the file review and site visits, it was discovered not all facility wastewater flow schematics or narrative process descriptions were comprehensive, current or accurate. The City must require its permitted industries to keep these documents updated. This auditor could not fully understand wastewater flows from different regulated processes through pretreatment to the final sampling point during the IU site visits.

While the City’s current fact sheets are a good work in progress (see Attch. A-2 for example), they lack pertinent comprehensive narrative process descriptions and understandable wastewater flow schematics with directional arrows from the point(s) process wastewater is generated, through pretreatment all the way to the exact sampling point. These should be sent to every industry representative to update (denoting the revision date on the document[s]).

**4) Under 40 CFR 403.12(l)**, “Signatory requirements for Industrial User reports. The reports required by paragraphs (b), (d), and (e) of this section shall include the certification statement as set forth in §403.6(a)(2)(ii)...”

During Claridge Extrusion’s file review it was discovered their periodic report included an incorrect certification statement. The City must notify Claridge of this error and correct it.

**5) Under 40 CFR 403.8(f)(2)(i)&(ii)**, [Harrison] shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable [Harrison] to:

(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 [ADEQ] upon request;

(ii) Identify the character and volume of pollutants contributed to the POTW by the Industrial Users identified under paragraph (f)(2)(i) of this section. This information shall be made available to [ADEQ] upon request...”

During the checklist review it was noted the City had conducted a fairly recent IU survey (see Attch. A-1 for example survey form and list of ~40 non-permitted industries/businesses the survey was sent to).

Information compiled/summarized from these surveys could not be produced. The City must create a data base with its surveys’ most pertinent information on it. All surveys should be digested into one single spreadsheet denoting information regarding toxic chemicals on-site, sanitary only, wastewater characteristics, disposal methods, floor drains in proximity of chemical storage, etc.

See Chapter 2, table 2.1 through 2.3 in EPA's guidance for information EPA deemed pertinent to place in such a spreadsheet. The guidance is located at <http://www.epa.gov/npdes/pubs/owm0003.pdf>.

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

1) Strong recommendation to include in permitted industries' fact sheets a more comprehensive and understandable set of calculations showing the basis for the City's production based categoricals. See Requirement 1) above.

Other information that would be helpful in an industry's fact sheet section would be its comprehensive wastewater generating processes' description as well as its comprehensive wastewater flow schematic with directional arrows from point of generation through process tanks, treatment to the final sampling point. These two key information sources are Federally required in 3) above. The industry representatives should be provided both their process narratives and wastewater flow schematics to update, certify and date them for return to the City within a specified period of time.

As mentioned in requirement 2) above, "...the inspection forms can state, 'process narrative and wastewater schematics are located in the IU's file kept by the City' shortening the inspection form."

Also see <http://www.epa.gov/npdes/pubs/owm0017.pdf>, Appendix I for EPA's recommended fact sheet information desired.

2) Strongly recommend requesting the City's Chamber of Commerce or its building permits section to include the City's Pretreatment Coordinator on some type of routing form keeping the City Coordinator informed of when a new industry or business is planning to connect to the City's sewage collection system.

3) 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 City's sampling must be identical to that agreed upon with their industries as being representative of their daily wastewater characteristics [emphasis added].

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

5) Continue conducting industry/business surveys. It is suggested to conduct these by industry or business sector to better design questions specific to that sector's operations. Questions regarding Pollution Prevention (P2) activities should also be included in these surveys AND on permit



applications (recycling is not considered true P2. The waste has already been generated).

The industries visited all had some form of P2 activities they were practicing.

6) 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.

7) Recommend including a revocation of permit clause in all industry permits as another enforcement option.

8) Recommend including a more descriptive narrative of all industries' sampling point by identifying them with footages from a fixed reference point.

9) Recommend sending out the hazardous waste notification notice in 40 CFR 403.12(p) as generators of hazardous waste move continually move around the country. The latest hazardous waste generator's list for Harrison was provided during the audit.

10) Recommend sending out fliers or placing "door hangers" to the general public advising them of proper disposal of grease, pharmaceuticals and non-dispersibles.

**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 piecemeal modifications indicates it needs a few more corrections/revisions/additions to be approvable.

2) Submit to this office six (6) representative domestic/light commercial analysis using the most sensitive methods. The current technically based limits analysis was last done in May of 2000 and the methods used were not as sensitive as what can be achieved today. This will lend more credence to the conclusion that TBLLs are not necessary at this time.

\* \* \* \* \*

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  
 email 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  
 email tim.holt@cityofharrison.com

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: 7/7 - 9/15  
 (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>6/12</u>	<u>Satisfactory</u>
<u>PCI</u>	<u>1/14</u>	<u>Satisfactory</u>

# SECTION I: GENERAL INFORMATION

YES NO

     Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

        Is the Control Authority currently in SNC or RNC?

.....

There's not been any substantial changes to the implementation of the City's Pretreatment Program since the last audit (9/11). There's been one Categorical industry who has moved its operations out of the country; therefore, there will not be many changes to this entire checklist.

# SECTION I: GENERAL INFORMATION

## B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR0034321	Harrison	10/1/07	9/30/12

### 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 (Avg.)- 1.6 MGD

Sewer System: 100 % # of SSOs due to grease blockages 3

#### Industrial Contribution to this Treatment Plant

# of SIUs: 4 # of CIUs: 4  
Industrial Flow (mgd): .0256 Industrial Flow (%): 1.6 %

#### Level of Treatment

#### Type of Process(es):

Primary	<u>          </u>	<u>Automated fine screen; grit removal; primary</u>
Secondary	<u>  ✓  </u>	<u>clarifiers; 2 parallel oxidation ditches;</u>
Tertiary	<u>          </u>	<u>final clarifiers; primary and secondary solids processed</u> <u>thru a gravity thickner, 2 aerobic digesters in series</u> <u>or parallel; belt press w/biosolids land applied</u>

Method of Disinfection: UV

Dechlorination    YES   ✓   NO

#### Effluent Discharge

Receiving Stream Name: Crooked Creek then to the White River

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

Receiving Stream Use: Primary contact recreation/raw water source for public, industrial and AG water supplies; propagation of desirable species of fish and other aquatic life

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

Method of Sludge Disposal:

Quantity of Sludge:

<u>  ✓  </u> Land Application	<u>193</u> dry tons/yr. (2014)
<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	<u>          </u> dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals; NH3-N, TRC

# SECTION I: GENERAL INFORMATION

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

YES NO

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

Issuing Authority: ADEQ Permit #5158-W  
 Effective Date: 12/1/12  
 Expiration Date: 11/30/17

List pollutants that are specified in current sludge NPDES permit:  
References the 40 CFR 503 Tables' parameters

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?) There has been no lethality or sublethality shown to either species since 2008.

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>1</u>	<u>      </u>
Priority **	<u>1</u>	<u>1</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>

\* 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)

NH3-N (8/31/14)

Equipment modifications caused low D.O.; therefore, NH3-N violation

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.

The City submitted their modified Pretreatment Ordinance on 2/7/12. It was reviewed, approved (2/14/12) and actually adopted before approval on 12/19/11 in Ordinance # 1351.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
<u>2/14/12</u>	<u>Ordinance #1351 adopting Streamlining requirements to meet new CFR 403 requirements. Entire Program mods have not been fully reviewed/approved.</u>	<u>n/a</u>

2. Modifications in Progress:

Date Requested 8/30/12 Nature of Modification Remaining sections of their Pretreatment Program were submitted "piecemeal" fashion and to date have not been fully reviewed/approved.

YES NO

Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:

Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

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

Date of original Pretreatment Program approval: 8/6/98  
 Date of most recent Ordinance approved by the Control authority: 12/6/11  
 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**

- YES    NO
- Require compliance schedules and IU reports
- Carry out inspection and monitoring activities
- Obtain remedies for noncompliance
- Comply with confidentiality requirements
- Establish Pollution Prevention
- Has the city developed and adopted a Pollution Prevention policy?
- 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:

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

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

Problems

- Updating industrial waste survey n/a
- Notification of IUs \_\_\_\_\_
- Permit issuance \_\_\_\_\_
- Receipt and review of IU reports \_\_\_\_\_
- Inspection and sampling of IUs \_\_\_\_\_
- Assessment of IUs for P<sup>2</sup> activity \_\_\_\_\_
- Analysis of samples \_\_\_\_\_
- Enforcement \_\_\_\_\_
- Other: \_\_\_\_\_

Briefly describe other problems: \_\_\_\_\_

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

IU Name	Problem	NPDES Permit Violation	
		Yes	No
<u>n/a</u>			

## SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] City sent ~44 IWS' out in 2013. See Attch. A-1 for example and list.

If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> activity?

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

If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P<sup>2</sup> activity and the distribution of P<sup>2</sup> 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:

<u>Name of IU</u>	<u>Type of Industry</u>	<u>Is the IU Permitted?</u>
<u>n/a</u>		

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) [during last "Pret. year"]
- b. 4 Categorical Industrial Users (CIUs) [during last "Pret. year"]
- c. 0 Noncategorical SIUs
- d. 2 Other regulated nonsignificant IUs (Describe) "porta-potty" hauler & a septage waste hauler
- 6 TOTAL of a. + d.

YES NO

Has the POTW identified any IUs with Pollution Prevention opportunities?

Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1-3)]

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.



**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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

YES NO  
     Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

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

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

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? None

If there are any SIUs without current (unexpired) permits, please complete the information below:

IU NAME	PERMIT
	EXPIRATION DATE
<u>n/a</u>	

YES NO  
 Does the Control Authority accept trucked septage wastes?  
 Does the Control Authority accept other trucked wastes? (Porta-potties)  
 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.*

YES	NO	
<u>   </u>	<input checked="" type="checkbox"/>	Does Control Mechanism designate a discharge point? [403.5(b)(8)] <i>"Where influent enters the WWTP...with an authorized Harrison WWTP employee witnessing the event."</i>
<u>   </u>	<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>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?

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:

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

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### 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?

10/11 Date Notified Letter Method of Notification

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

Federal Register  Journals, Newsletters  
 Meetings, Training  Other Internet  
 Government Agencies  Other \_\_\_\_\_

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

If yes, complete the information below:

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

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

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		May 2000 MAHC Numerical Levels Calc'd (mg/l)
	Yes	No	Yes	No	Yes	No	
	+						
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.08
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.02
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.0
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.29
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.0
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.05
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.00003
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.07
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.47
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.01
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.08
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.30

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

+ - MAHLs/MAHCs have historically not been exceeded with good safety factors.

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

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

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

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

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

**H. COMPLIANCE MONITORING**

Compliance Monitoring and Inspection Requirements:

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

# % How many and what percentage of SIUs were:  
 (refer to p.1 for Pretreatment year)

0 0 Not sampled at least once in the past reporting year?

0 0 Not inspected at least once in the past Pretreatment reporting year?

0 0 Not inspected and not sampled at least once in the past reporting year?  
 [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	<u>Biomonitoring</u>	<u>ETC</u>

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.)

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?

\_\_\_  Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: \_\_\_\_\_

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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)]
- Does the Control Authority have a written enforcement response plan? [403.8(f) (5)]. If yes, does the plan:

YES NO

- Describe how the Control Authority will investigate instances of noncompliance
- Describe the Control Authority's types of escalating enforcement responses and the periods for each response
- Identify by Title the Official(s) responsible for implementing each type of enforcement response
- Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

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

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Notice or letter of violation  | <input checked="" type="checkbox"/> Administrative Order    |
| <input checked="" type="checkbox"/> Setting of compliance schedule | <input checked="" type="checkbox"/> Revocation of permit    |
| <input checked="" type="checkbox"/> Injunctive relief              | <input checked="" type="checkbox"/> Fines (maximum amount): |

civil	\$ <u>1000</u> /day/violation
criminal	\$ <u>1000</u> /day/violation
administrative	\$ _____ /day/violation

- Imprisonment
- Termination of Service
- Other: Water supply severance

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

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## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]

Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].

Comment: \_\_\_\_\_

  n/a   If no, does the Control Authority conduct all of the monitoring?

YES NO N/A

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

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified	Enforcement Action	Return to Compliance?	
	in SNC	Type	Yes (Date)	No
<u>  n/a  </u>				

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

#	%	
<u>  0  </u>	<u>  0  </u>	Pretreatment Standards (Local Limits/Categorical Standards)
<u>  0  </u>	<u>  0  </u>	Self-monitoring requirements
<u>  0  </u>	<u>  0  </u>	Reporting requirements
<u>  0  </u>	<u>  0  </u>	Pretreatment compliance schedule
<u>  0  </u>		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled?

YES NO

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

Has the Control Authority experienced any of the following:

YES NO

EXPLAIN and ID Industrial User

- Interference \_\_\_\_\_
- Pass through \_\_\_\_\_
- Fire or explosions? \_\_\_\_\_  
(incl. flash point viol.)
- Corrosive structural damage? \_\_\_\_\_  
(incl. pH <5.0)
- Flow obstructions? \_\_\_\_\_
- Excessive flow or pollutant concentrations? \_\_\_\_\_
- Heat problems? \_\_\_\_\_
- Interference due to oil or grease? \_\_\_\_\_
- Toxic fumes? \_\_\_\_\_
- Illicit dumping of hauled wastes? \_\_\_\_\_

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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>	\$ <u>          </u>
Administrative	<u>0</u>	\$ <u>          </u>
Total	<u>0</u>	\$ <u>          </u>

**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  
      IU Compliance Status Tracking  
          Other: \_\_\_\_\_

Can IU monitoring data can be retrieved by:

      Industry name  
      Pollutant type  
      Industrial category or type  
      SIC Code  
      IU discharge volume  
      Geographic location  
     n/a Receiving treatment plant (i.e. if > one plant in the system)  
          Other (specify) \_\_\_\_\_

     Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]

      Have IUs requested that data be held confidential? How is confidential information handled by the Control Authority?  
     "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?

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

**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:

	<u>Percent of Total Funding</u>
<input checked="" type="checkbox"/> POTW general operating fund	<u>100</u>
<u>    </u> IU permit fees	<u>          </u>
<u>    </u> monitoring charges	<u>          </u>
<u>    </u> industry surcharges	<u>          </u>
<u>    </u> 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"/>	<u>    </u>	Legal assistance	_____
<input checked="" type="checkbox"/>	<u>    </u>	Permitting	_____
<input checked="" type="checkbox"/>	<u>    </u>	IU inspections	_____
<input checked="" type="checkbox"/>	<u>    </u>	Sample collection	_____
<input checked="" type="checkbox"/>	<u>    </u>	Sample analyses	_____
<input checked="" type="checkbox"/>	<u>    </u>	Data analysis, review and response	_____
<input checked="" type="checkbox"/>	<u>    </u>	Enforcement	_____
<input checked="" type="checkbox"/>	<u>    </u>	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"/>	<u>    </u>	Sampling equipment	<u>3 ISCO &amp; 1 Sigma auto samplers</u>
<input checked="" type="checkbox"/>	<u>    </u>	Safety equipment	<u>Standard list</u>
<input checked="" type="checkbox"/>	<u>    </u>	Vehicles	<u>1 pick-up</u>
<input checked="" type="checkbox"/>	<u>    </u>	Analytical equipment	<u>for standard conventionals</u>



## SECTION II: PROGRAM ANALYSIS AND PROFILE

### I. 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:  
No  
\_\_\_\_\_  
\_\_\_\_\_
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) ~5,000 Avg. Process Flow (gpd) ~5,000  
Industry visited during audit: YES  
Comments: Anodizing and colorizing conducted

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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) ~1,100  
Industry visited during audit: YES  
Comments: \_\_\_\_\_

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FILE #: 3 Industry Name: Pace Industries 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 & 464.45  
SIC Code: 3363 NAICS Code: 331521  
Avg. Total Flow (gpd) ? Avg. Process Flow (gal/month) ~14,000  
Industry visited during audit: YES  
Comments: \_\_\_\_\_

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## SECTION III: INDUSTRIAL USER FILE REVIEW

### A. Industrial User Characterization

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

### B. Control Mechanism

1. Does the file contain an application for a control mechanism?	<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>
Does it ask for Pollution Prevention information?	<u>no</u>	<u>no</u>	<u>no</u>
2. Does the file contain a Permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>
Permit Expiration Date?	<u>10/15</u>	<u>10/15</u>	<u>10/15</u>
Is a fact sheet included? (See Attch. A-2 for example)	<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>1</u>	<u>1</u>	<u>1</u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Appropriate discharge limitations?	<u>2</u>	<u>2</u>	<u>2&amp;5</u>
e. Appropriate self-monitoring requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Sampling frequency?	<u>3</u>	<u>3</u>	<u>3</u>
g. Sampling locations?	<u>4</u>	<u>4</u>	<u>4</u>

Comments: 1) Specific Ordinance or City Code # is not on cover page of permits indicating the City's authority to issue permits; 2) Time constraints did not allow auditor to independently verify production based/converted to concentration based limits, but some did not appear correct upon cursory review; 3) Sample frequency should be seen on limit's page, not just in the narrative portion of the IUs' permits; 4) Sampling point could be better described by footages from a fixed reference point; 5) Pace's permit should not include a metal finishing component to their production based limits via the combined wastestream formula.

## SECTION III: INDUSTRIAL USER FILE REVIEW

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

Comments: 1) Type of samples (grab or timed/flow-proportional composites) should be seen on limits' page, not in narrative portion of the IUs' permits. Permits should specify what type of composite - time or flow proportioned; 2) See previous page's comments #2 and #5.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</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>
7. Is the Control Authority applying a bypass provision to this IU?	<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>
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>
3. Does the sampling report(s) include: [403.8(f) (2) (vi)]			
a. Name of sampling personnel?	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Sample date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Sample type?	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Wastewater flow at the time of sampling?	<u>1</u>	<u>1</u>	<u>1</u>
e. Sample preservation procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Chain-of-custody records?	<u>✓</u>	<u>✓</u>	<u>✓</u>
g. Results for all parameters? SIUs & CIUs [403.12(g) (1) - CIUs]	<u>✓</u>	<u>✓</u>	<u>✓</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>n/a</u>	<u>2</u>	<u>n/a</u>

Comments: 1) Flow measurements could not be found with sampling event reports. The City must verify IUs' regulated wastewater flows; 2) Only one their CIUs have Metal Finishing ops in conjunction with CFRs 464 & 420 so their separate TTO limits are taken into account via the CWF.

# SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</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>
6. Were 40 CFR 136 analytical methods used? [403.8(f) (2) (vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>
<u>Inspections</u> (See Attach. A-3 for example old form and Attach. A-4 for new form)			
7. Does the IU file contain inspection reports?	<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>
b. Date of last Inspection	<u>12/14</u>	<u>12/14</u>	<u>12/14</u>
9. Does the inspection report(s) include: [403.8(f) (2) (vi)]			
a. Inspector Name(s)	<u>no</u>	<u>no</u>	<u>no</u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Verification of production rates?	<u>1</u> <u>✓</u>	<u>✓</u>	<u>✓</u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>2</u>	<u>2</u>	<u>2</u>
f. Evaluation of pretreatment facilities?	<u>3</u> <u>✓</u>	<u>3</u> <u>✓</u>	<u>3</u> <u>✓</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>3</u> <u>✓</u>	<u>3</u> <u>✓</u>	<u>3</u> <u>✓</u>
h. Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) See Attach. A-3c for note; 2) Vague with no mention of actual or average flow, just "meters"; 3) Could be more comprehensive.

## SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>
i. Manufacturing facilities?	<u>3</u>	<u>3</u>	<u>3</u>
j. Chemical handling and storage procedures?	<u>3</u>	<u>3</u>	<u>3</u>
k. Chemical spill prevention areas?	<u>3</u>	<u>3</u>	<u>3</u>
l. Hazardous waste storage areas and handling procedures?	<u>no</u>	<u>no</u>	<u>no</u>
m. Sampling procedures?	<u>3</u>	<u>3</u>	<u>3</u>
n. Laboratory procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
o. Monitoring records?	<u>no</u>	<u>no</u>	<u>no</u>
p. Evaluation of Pollution Prevention opportunities?	<u>✓</u>	<u>✓</u>	<u>✓</u>
q. Control Authority inspector signature?	<u>no</u>	<u>no</u>	<u>no</u>
<u>IU Self-Monitoring and Reporting</u>			
10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>
11. Does the file include:			
a. BMR?	<u>Arch.</u>	<u>Arch.</u>	<u>Arch.</u>
b. 90-Day Report?	<u>"</u>	<u>"</u>	<u>"</u>
c. All periodic reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
12. Did the IU report on all required parameters?	<u>✓</u>	<u>✓</u>	<u>✓</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>
14. Did the IU report flow?	<u>✓</u>	<u>✓</u>	<u>✓</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>1</u>	<u>✓</u>	<u>✓</u>

Comments: 1) Facility's reports do not have correct certification statement on them;  
3) See comment #3 from previous page.

## SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</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>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>✓</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>

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>
b. Did POTW respond to the spill?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>

### E. Enforcement

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>n/a</u>
b. IU self-monitoring results?	<u>n/a</u>	<u>n/a</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>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>1</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>✓</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>



## SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/a</u>	<u>n/a</u>	<u>not nec.</u>
8. Did the Control Authority follow its approved ERP?	<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>n/a</u>	<u>✓</u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>no</u>	<u>no</u>
11. Were there any compliance schedule violations?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f) (2) (vii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>
During such evaluation for SNC, did the CA consider each of the following criteria?			
a. Chronic violations	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
b. TRC	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
c. Pass through/Interference	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
d. Spill/slug loads	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
e. Reporting	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
f. Compliance schedule	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
g. others (specify)	<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>
Date of publication.	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>

# REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Harrison NPDES #: AR0034321  
Date of Audit: 7/7 - 9/15 Date entered into ICIS: 8/28/15  
(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 (Administrative in nature)	Other violations of concern	II

### SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

Control Authority: City of Harrison NPDES #: AR0034321

Name, address and phone number of industry:  
 Claridge Extrusions, 219 Industrial Park Road, 870.743.2207

Type of industry: Al Extrusion/Anodizing Date/Time of visit:  
CFR 467 7/8/15 / 10:35 a.m.

Industry contacts: Buddy Shatswell, Maint. Supt./Mike Nunlee,  
 Plant Mgr/Jake Mattix, Maint. Supv.

	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's processes have not changed substantially since last audit (9/11). Raw material consists of various alloyed aluminum. End products include door and window frames (satinized) or otherwise powder coated or wet painted. Billets (18" to 24") are brought in, heated to approx. 875 degrees F, then forced through carbon steel dies in long strips. Press had recently been re-piped reducing their hydraulic oil usage from ~200 bbls to 16 bbls/yr. 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: 7/8/15

*Allen Gilliam*

(signature of auditor conducting visit)

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

Control Authority: City of Harrison NPDES #: AR0034321

Industry name: Claridge Extrusions

Additional comments: Material is cut to desired length, then aged in an oven. Depending on customer specs. the pieces can just be sent out as "mill finish" (~55%); phosphatized/rinsed for either powder coated 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. IU rep. was familiar with their pretreatment requirements and very cooperative. Adequate sampling point.

Visit conducted by: Gilliam/Holt Date: 7/8/15

*Allen Dillman*

(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 870.704.4777

Type of industry: Al Die casting Date/Time of visit:  
CFR 464 7/8/15 / 1:30 p.m.

Industry contacts: Mark Maddox, EHS Mgr.

	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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 (9/11). They have an EMS as prescribed by their ISO certification. They die cast Al into various shapes and forms for outside customers (40 to 50% are for auto parts). Currently, there are 26 die casting machines (9 to 11 of them are manually operated) producing negligible wastewater. Some parts are heat treated and then City water quenched in a continually mixed cooling sump. IU rep indicated the wastewater is from the spraying of the open molds for cooling (contact & non-contact [leaks]) anti-seize mixture application along with some hydraulic lines' leakages.

Visit conducted by: Gilliam/Holt Date: 7/8/15

Allen Gilliam

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

Control Authority: City of Harrison NPDES #: AR0034321

Industry name: Pace Industries

Additional comments: 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 self-contained 20,000 gal. holding tank (where enzymes are added to "eat" oily waste) 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 lime (and hydrogen peroxide to treat T. phenol out) is 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 a new refrigerated ISCO 4700 sampler where time-composites are collected. 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 (~4,200) of equipment in the building.

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

Building is built to contain any major spills. Facility is ISO 14001 certified and IU rep. was familiar with his pretreatment requirements. Adequate sampling site.

Visit conducted by: Gilliam/Holt Date: 7/8/15

*Allen Gilliam*

(signature of auditor conducting visit)

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Harrison NPDES #: AR0034321

Name, address and phone number of industry:  
 ADC Manufacturing, 300 Industrial Park Rd., 870.741.6193

Type of industry: Al Die Cast/Metal Date/Time of visit:  
Finishing/Fe & Steel CFRs 433/464/420 7/8/15 / 8:30 a.m.

Industry contacts: Kathy Slay, Plant Manager/Kathy Roberson & Todd Allen

	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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 produces hardware primarily (90%) for chain link fence and has not changed basic operations since the 9/11 audit. Raw material includes hot 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 facility currently operates with one 8 hr. shift. The die cast dept. will begin to run 2 shifts with 3 operational machines. The die cast department consists of 4 die cast machines (have their own furnaces), 3 operational and a vibratory tumbler. The rinse after the ball burnishing (steel media) uses a non-haz waste industrial soap. The water 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

Visit conducted by: Gilliam/Holt Date: 7/8/15



# 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: 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 mV (effluent turns deep purple in color) phenol destruct is complete and effluent is pumped to equalization tank.

The galvanizing process consists of sending steel hardware through a caustic bath, pickling (sulfuric acid), another caustic (rinse) bath, pre-flux, and then hot-dip coating (Zn galvanized). The parts placed in a "spinner" cage (centrifugal) to remove the excess Zn and are then sent to a water quench tank. The quench water is then 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 fresh water rinses. The water from this process is sent to the equalization tank (heat from their casting machines help heat 2 of these tanks). Parts are conveyed thru a dry-off oven and powder coated.

Very small chemical storage area with barrels stored on spill pallets. Chems are handled using "barrel grippers" on fork lifts to move the majority of their chemicals throughout the plant. Flammables are kept in a separate area.

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. Preventive maintenance is conducted weekly.

Visit conducted by: Gilliam/Holt Date: 7/8/15

Allen Gilliam

(signature of auditor conducting visit)





Attachment A-1

Handled me during  
7/7 Audit

# Harrison

Arkansas

## Department of Public Works

Pretreatment Department  
Tim Holt  
Pretreatment Coordinator  
1508 Silver Valley Road  
Harrison, Arkansas 72601  
Office: 870.741.4426  
Fax: 870.741.5022  
www.cityofharrison.com  
tim.holt@cityofharrison.com

7-9-2013

To: Industries

From: Tim Holt

Subject: Pretreatment

Dear Establishment Manager

In order for the City of Harrison to stay within compliance of their NPDES permit, issued by Arkansas Department of Environmental Quality, to discharge water into Crooked Creek, requires a periodical survey of various establishments that contribute wastewater to the Harrison Wastewater Treatment Facility.

Please take the time to fill out and return the attached short questionnaire to the address below.

Thank you in advance for your cooperation in this important matter.

City of Harrison-WWTP  
Att. Tim Holt  
PO Box 1715  
Harrison Ar 72601

PO Box 1715  
Harrison, AR 72602

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

Pretreatment Department  
 Tim Holt  
 Pretreatment Coordinator  
 1508 Silver Valley Road  
 Harrison, Arkansas 72601  
 Office: 870.741.4426  
 Fax: 870.741.5022  
 www.cityofharrison.com  
 tim.holt@cityofharrison.com

### Industrial Wastewater Screening Form

Part I - Industry Information

Business Name: \_\_\_\_\_  
 Business Location: \_\_\_\_\_  
 Business Mailing Address: \_\_\_\_\_  
 Contact Person Name: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Telephone Number: \_\_\_\_\_  
 Business Hours \_\_\_\_\_ Business Days:  Mon.  Tues.  Wed.  Thurs.  Fri.  Sat.  Sun  
 Number of Employees: \_\_\_\_\_  
 Water Works Account Number(s): \_\_\_\_\_  
 (Include all Active Account Number(s))

Part II - Wastewater Characteristics

Type of Business: \_\_\_\_\_  
 Process(s) Performed: \_\_\_\_\_  
 Products Manufactured: \_\_\_\_\_  
 SIC Code: \_\_\_\_\_  
 NAICS Code: \_\_\_\_\_  
 Gallons of water used per month: \_\_\_\_\_  
 Please check all sources of wastewater discharged from you facility to the sanitary sewer. \_\_\_\_\_

Type of Wastewater	Estimate Percent of Total Discharge	Type of Wastewater	Estimate Percent of Total Discharge
Bathrooms/Domestic		Laundry	
Kitchen/Restaurant		Metal Working	
Floor Cleaning		Plating Baths	
Tank Wastes		Equipment Cleaning	
HV AC/Boiler Discharges		Pretreatment System	
Vehicle Maintenance Wash		Machine Coolants	
Waste Product Disposal		Other Non-domestic Sources	

Part II- Continued

Indicate all materials listed below that have a potential for sanitary sewer discharge in some form at your facility. Many of these will be listed on Material Safety Data Sheets. **Please include a copy of MSDS for all chemicals used.**

Yes	No		Yes	No		Yes	No	
		Gasoline			Whole Blood			Lime Slurries
		Xylene			Fleshings			Lime Residues
		Tolulene			Entrails			Sodium Chloride
		Diesel			Paper (Non-Domestic)			Sodium Sulfate
		Benzene			Styrofoam			Radioactive Wastes
		Naptha			Plastic Containers			Radioactive Isotopes
		Sulfides			BOD			Storm Water
		Kerosene			COD			Surface Water
		Ethers			Temperature > 140' F			Ground Water
		Alcohols			Medical Wastes			Roof Runoff
		Swimming Pool Drainage			Non- Biodegradablee Cutting Oils			Non-Contact Cooling Water
		Aldehydes			Noxious Gasses			Subsurface Drainage
		Peroxides			Toxic Solids			Ketones
		Chlorates			Poisonous Solids			Condensate
		Perchlorates			Toxic Gases			De-Ionized Water
		Bromates			Poisonous Gases			Artesian Well Water
		Carbides			Toxic Liquids			Unpolluted Water
		Hydrides			Poisonous Liquids			Sludges
		Wood			Noxious Liquids			Screenings
		Closed Cup Flash Point < 140' F			Hauled or Trucked Liquid Waste			Corrosive Characteristics
		LEL > 10%			Noxious Solids			Detergents
		pH > 12.0 s.U.			Malodorous Liquids			Surfactants
		pH < 5.0 s.U			Malodorous Gases			Mineral Oils
		Ashes			Malodorous Solids			Cooking Oils
		Cinders			Dye Wastes			Petroleum Oil
		Sand			Vegetable Tanning			Fuel Oils
		Plastic			Colored Solutions			Pretreatment Residue
		Ground Garbage			Inert Suspended Solids			Silver Waste
		Un-Ground Garbage			Fuller Earth			Mercury Waste

What is being done concerning pollution prevention? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Part III- RCRA Notification for Hazardous Waste Disposed to the Sanitary Sewer

The USEP A regulations require that local control authorities notify users that there are identification and disposal requirements for hazardous waste. 40 CFR 403.12(p)(1)-(4) States "All users shall notify the POTW of any discharges into the POTW of a Substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261". All users shall dispose of any sludge or spent chemicals in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act. For further instruction on hazardous waste identification and disposal contact the Arkansas Department of Environmental Quality (ADEQ) Hazardous Waste Division at 682-0833. 0 Yes 0 No Hazardous Waste Discharge to Sanitary Sewer

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Part IV - Certification Statement

40 CFR 403.12 requires that this report be signed by a Chief Executive Officer of at least the level of Vice President, a general Partner or Proprietor, or a Duly-Authorized Representative.

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

Signed: \_\_\_\_\_

Printed Name and Title: \_\_\_\_\_

Date: \_\_\_\_\_

A-1d

Claridge Products & Extrusion  
PO BOX 910  
Harrison, AR 72601

Anchor Die Cast  
300 N Industrial Pk Rd  
Harrison, AR 72601

Pace Industries  
PO BOX 1198  
Harrison, AR 72601

Rock-Tenn  
329 W Industrial Pk Rd  
Harrison, AR 72601

Arkansas Products  
PO BOX 906  
Harrison, AR 72601

Wabash  
339 Industrial Pk Rd  
Harrison, AR 72601

Flexsteel  
PO Box 1059  
Harrison, AR 72601

Barrett Plastics  
330-4 Industrial Pk Rd  
Harrison, AR 72601

ABC Block  
214 Industrial Pk Rd  
Harrison, AR 72601

Hammons Tool & Die  
PO Box 1501  
Harrison, AR 72601

Harrison Daily Times  
PO Box 40  
Harrison, AR 72601

Enchanted Marble  
PO Box 1101  
Harrison, AR 72601

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S.C. Seasoning CO  
306 N Industrial Pk Rd  
Harrison, AR 72601

Shamrock Automation  
320 Industrial Pk Rd  
Harrison, AR 72601

Tankenetics  
230 W Industrial Pk Rd  
Harrison, AR 72601

Topstitch Embroidery  
103 Cottonwood Rd  
Harrison, AR 72601

TRG Harrison  
316 W Industrial Pk Rd  
Harrison, AR 72601

Trophy Shop  
676 Bunker Rd  
Harrison, AR 72601

T-Shirt Techniques  
207 W Rush Ave  
Harrison, AR 72601

Wright Steel & Machine  
PO Box 1176  
Harrison, AR 72601

Ark-Rod  
1902 Rock Springs Rd  
Harrison, AR 72601

Arnold Printing  
PO Box 813  
Harrison, AR 72601

ARTCO  
330 W Industrial Pk Rd  
Harrison, AR 72601

Brisco Woodworking  
14628 Hwy 43 S  
Harrison, AR 72601

Durable Ralph  
4369 Rock Springs Rd

Harrison, AR 72601

Eastman-Booth  
4101 W Commercial  
Harrison, AR 72601

GFI INC  
Po Box 1112  
Harrison, AR 72601

Gary Signs  
213 Glenview St  
Harrison, AR 72601

Guy's Signs  
1616 N Spring Rd  
Harrison, AR 72601

Harness Mattress MFG  
200 E Sherman Ave  
Harrison, AR 72601

Harrison Machine  
1412 Goblin Dr  
Harrison, AR 72601

Harrison Signs  
PO Box 493  
Harrison, AR 72601

Hart Monument  
403 N HWY 62-65  
Harrison, AR 72601

Illumination Station  
4700 Willow Ln  
Harrison, AR 72601

International Grating & Flange  
PO Box 2477  
Harrison, AR 72601

Magnet Co  
PO Box 460  
Harrison, AR 72601

Metal Craft  
4263 Creel Rd  
Harrison, AR 72601

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Miller Hardware  
2 E Necessity Ave  
Harrison, AR 72601

MMP Sabots  
518 Buck Hollow Ln  
Harrison, AR 72601

Oreilly Autoparts  
1524 N Main St  
Harrison, AR 72601

Parker Enterprises  
320 HWY 62-65N  
Harrison, AR 72601

Peterson MFG  
PO Box 2177  
Harrison, AR 72601

Quality Quick Printing  
824 S Pine St  
Harrison, AR 72601

Harrison, AR 72601

Johnson Manufacturing  
Po Box 1174  
Harrison, AR 72601

# Industrial Fact Sheet

## Claridge Extrusions

Updated May 24, 2013

**Address/Phone:**

Claridge Extrusions  
219 Industrial Pk Rd  
Harrison, AR 72601  
(870) 743-2200

**SIC:** 3471, 3354

**NAICS:** 332813

**Contacts:**

Harry Wagoner Maintenance Manager  
hwagoner@claridgeproducts.com

**Permit:**

Permit #001-10

Significant Industrial User; subject to Categorical Standards for Aluminum Die Casting;

Effective October 11, 2010 through October 11, 2015

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 waste stream 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. These effluent limitations must be met after pretreatment at Outfall No. 1.

<u>Parameter</u>	<u>Concentration mg/l</u>	
	<u>Daily Maximum</u>	<u>Monthly Average</u>
Chromium (T)	0.72	
Cyanide (T)	0.50	0.30
Zinc (T)	2.25	0.21
TTO's	1.13	1.01
Oil & Grease, mg/l	100	

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

<u>Parameter</u>	<u>Concentration mg/l</u>	
	<u>Daily Maximum</u>	<u>Monthly Average</u>
<b>Oil &amp; Grease</b>	<b>100</b>	
<b>pH</b>	<b>6.0-10.0</b>	
<b>Temperature</b>	<b>150F (66C)</b>	

**Physical Description of Manufacturing Process:**

Material is cut to desired length, and 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/rinse for either powder or wet painted (~5%) or anodized (~40%) through an acid or caustic process. This entire process line consists of 18 baths/rinses (some that are counter current cascade flow. All 18 tanks are identified with actual chemicals on a chart hanging beside the process line. 5 of the baths are heated. These tanks sit above a concrete pit which would catch any spills or drippage which could be captured in a sump pump that would be pumped to treatment. All anodizing wastewater is gravity fed to a 6' x 6' x 8' deep concrete pit outside the building which has been built to replace the old outside settling ponds. From the pH adjustment pit, it is pumped into 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 forty 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.

**Pretreatment Equipment and Process:**

Filter Press

Die casting discharge goes through pretreatment of pH adjustment (using caustic soda), zinc removal (using ferric chloride), ultrafiltration and phenol removal (using hydrogen peroxide).

**Parameters Monitored:**

Outfall 001:

<b>Pollutant Parameter</b>	<b>Maximum For One Day</b>	<b>Maximum For Monthly Average</b>
Chromium (T) mg/l	0.72	0.30
Cyanide (T) mg/l	0.50	0.21
Zinc (T) mg/l	2.25	1.01
TTO mg/l	1.13	
pH, S.U.	6.0-10.0	
Oil & Grease mg/l	100	
Temperature	150F	


**Location of Outfalls:**

Outfall 001: Appropriate 24 hour Composite or Grab samples shall be collected at this point, after pretreatment, to determine combined pollutant concentrations in pretreated wastes from Aluminum Die Casting Operations regulated by 40 CFR 464.15 (b), (c) and (h).

**Chemical Handling Procedures:**

Chemicals are hauled in on an as needed basis so there is very little chemical storage.

**Pollution Prevention/Best Management Practices:**

pretreatment of wastewater; recycling of metal, office paper, post signs directing employees how to dispose of spent chemical, reminders to keep lids on drums and secure bungs; inside facility have secondary containment.

**Chronological History:**

**Basic Schematic:**

See attached.



# Public Works Department

# Harrison

Arkansas

<b>Pretreatment Industrial Inspection</b>	
<b>Facility Information</b>	
Facility Name: Anchor Die Cast	Site Address: 300 Industrial Park Rd
Contact Person (Name & Title): Kathy Slay/Plant Manager, Todd Allen/Pretreatment Operator	
Phone: 870-741-6193	
Fax:	
Last Inspection Date: 12-17-13	
POTW (City) IU discharges to: City Sewer	POTW's NPDES #AR0034321
Industrial Classification: <input checked="" type="checkbox"/> Categorical	<input checked="" type="checkbox"/> Significant
If Categorical, list which CFR #(s) the facility is subject to: 464.15, 464.46 & 433.17	

<b>I. Summary of Inspection</b>			
<b>A. Inspection and Objective (Complete Before Inspection)</b>			
<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Annual	<input type="checkbox"/> Spill/Slug	<input type="checkbox"/> Unscheduled
<input type="checkbox"/> New Construction	<input type="checkbox"/> Noncompliance	<input type="checkbox"/> Follow-up	<input type="checkbox"/> Complaint
Inspection Objective(s)			
Checklist of items to be reviewed and/or visually inspected:			
<input type="checkbox"/> Pre-inspection Meeting	<input type="checkbox"/> Permit Conditions	<input type="checkbox"/> Safety Concerns	
<input type="checkbox"/> Process Inspection	<input checked="" type="checkbox"/> Pretreatment Process	<input checked="" type="checkbox"/> TOMP	
<input checked="" type="checkbox"/> Chemical Storage	<input checked="" type="checkbox"/> Discharge point(s)	<input checked="" type="checkbox"/> Spills/Slug Control Plan	
<input checked="" type="checkbox"/> Records Review	<input type="checkbox"/> RCRA information	<input type="checkbox"/> Process/Flow/Pretreatment Schematics	
<input checked="" type="checkbox"/> IU sampling procedures	<input type="checkbox"/> Flow/pH Meter(s)	<input checked="" type="checkbox"/> Calibration Records	
<input checked="" type="checkbox"/> MSDS Inventory List	<input checked="" type="checkbox"/> New MSDS	<input type="checkbox"/>	
Comments:			
<b>B. Inspection Analysis</b>			
Were there any deficiencies/violations identified and noted during the inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

Tim Holt-Pretreatment Coordinator P.O. Box 1715 Harrison, AR 72601  
 (870) 741-4426-Office  
 (870) 741-5022-Fax  
[hwwtp2@windstream.net](mailto:hwwtp2@windstream.net)

Provide a brief narrative of deficiencies/violations or other concerns in the following areas: None
Records Review
Process Area(s)
Pretreatment System
Self Monitoring Procedures
Diversion/Sewer Meters
Spill/Slug Control Plan
Sampling Point
Chemical Storage

Years at present location: 42 years

Inspection date/time 12-2-14 /9:00am

Industrial waste discharge permit# 004-10

Sic code(s) 3479, 3363, 3469

Nature of business: Manufacturing of Zinc, Aluminum Die Cast& steel stamping chain  
Link fence hardware

Total employees each shift. Average. (Including office)

First 40                      Second 0                      Third 0

Number of days per week: 5

Water source: City  Other

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Products produced: fence fittings

Waste storage locations: plant trash-roll off dumpster, scrap metal goes in hoppers, shed contains aluminum ash, zinc, sludge and waste oil in 55 gal drums

How wastes are disposed of? Trash goes to landfill, scrap metal goes to scrap dealer; the aluminum, zinc and waste oils are picked up by recycler

Floor drain location & destination (attach updated drawing with sign & date)  
The Floor drains in the Die Cast Dept are connected to pretreatment

Verification of production rate: Productions tickets, work cards which Kathy Slay keeps record of.

Verification of flow rate, include locations. (Meters? Accurate estimates? Verifiable devices?)  
Meters in Powder Coating, Galvanizing, Die Casting

Is the production rate or flow substantially different (+/- 20%) from those used in calculating limits?  
yes  no

Pretreatment:  
Permit violation (current year) NONE

Location outfall #1 West of the pretreatment building

Location outfall #2

Contract laboratory name: American Interplex  
Address:  
Telephone #

Are wastestreams segregated before pretreatment?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Are they pretreated prior to discharge to the sanitary sewer?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Was the pretreatment system visually inspected during this visit?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:				
<input type="checkbox"/> Dissolved air floatation	<input type="checkbox"/> Membrane Tech.	<input type="checkbox"/> Ion Exchange	<input type="checkbox"/> Biological Treatment	
<input checked="" type="checkbox"/> Centrifugation	<input type="checkbox"/> Flow Equalization	<input type="checkbox"/> Ozonation	<input type="checkbox"/> Chlorinating	
<input type="checkbox"/> Chemical Precipitation	<input checked="" type="checkbox"/> Oil/Water Separation	<input type="checkbox"/> Reverse Osmosis	<input type="checkbox"/> Grit Removal	
<input checked="" type="checkbox"/> Sludge Filter Press	<input checked="" type="checkbox"/> Grease Trap	<input type="checkbox"/> Screen	<input type="checkbox"/> Solvent Separation	
<input checked="" type="checkbox"/> pH Adjustment	<input type="checkbox"/> Sand Trap	<input type="checkbox"/> Sedimentation	<input type="checkbox"/> Silver Recovery	

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(870) 741-5022-Fax

[hwwtp2@windstream.net](mailto:hwwtp2@windstream.net)

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<input checked="" type="checkbox"/> Belt/Disk Oil Skimmer	<input type="checkbox"/>	<input type="checkbox"/>
Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):		
All equipment inspected and appears to be in good working order.		
Is the discharge from the Pretreatment System? <input type="checkbox"/> Batch <input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Combination		
If any discharges are batch type or combination, describe the following:		
Volume of each batch: _____ gallons per		
Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
????	To manufacturers specs	

<b>Has there been any changes since the last inspection regarding the following items:</b>	
Plant/flow/process layout? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If yes, obtain copy of updated schematic for facility file.
Processes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If yes, explain:
Production Levels? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If yes, explain:
Raw materials? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If yes, explain:
Flow rates? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If yes, explain:

<b>Attachment B: Pollution Prevention (P2) / Recycling Activities</b>		
Does the facility have a written P2 Plan?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Does this facility practice P2?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Environmental Management System in place?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
ISO Certified?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Written Standard Operating Procedures?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Preventative Maintenance Program (hydraulic systems, valves, pumps, etc)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		

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*A-3d*

Water Reuse:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Cost Accounting to Track Savings:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Inventory Control / "Green Purchasing": purchasing", etc)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (lean manufacturing/"env. friendly
Explain:		
Employee Training:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Spent Solvent Reclamation?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Recycle Waste Oil, Solvents, and Lubricants?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Other Activities		

<b>Attachment D: Chemical Storage Area(s)</b>		
Does the facility have a designated chemical storage area(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Was this area(s) visually inspected? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. Zinc Dept	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
2.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
3.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
4.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
<input type="checkbox"/> Dikes, Berms for Containment	<input type="checkbox"/> Plugs for Floor Drains	
<input type="checkbox"/> Secondary Tanks for Holding	<input type="checkbox"/> Premix (low) Concentrations	
<input type="checkbox"/> Alarms	<input type="checkbox"/> Chain restraints, limited access	

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<input checked="" type="checkbox"/> Spills Control Kits for Cleanup	<input type="checkbox"/> Notification Procedures
<input type="checkbox"/> Chemical desegregation within Storage Area	<input type="checkbox"/> Other
Chemical Inventory List (MSDS) on file?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Were any new MSDS reviewed during the Inspection?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
If yes, list below:	
Chemical storage comments:	
Chemical handling procedures (totes, dolly, buckets, hardline, etc):	
55 gallon barrels	

<b>Attachment E: Spill/Slug Control Plan</b>	
Does the facility have a Spill/Slug control plan?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
Describes storage and handling of chemicals	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
Procedures for immediate notification to POTW of slug discharges	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
1. Describes measures for controlling toxic/hazardous pollutants	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
2. Describes procedures and equipment for emergency response	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
3. Describes follow-up to limit damage suffered by POTW or environment	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
Is it posted in areas where chemicals are used and stored?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? <input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A	

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<i>Visual Inspection of Discharge Lines/Points</i>
Provide description of manhole condition and flow channel of the following where applicable:
Sampling / Monitoring Point: Manhole south of building
Total Flow Monitoring Point: in pretreatment room
Upstream Manhole
Point of Connection:

Evaluation of Self-Monitoring Equipment and techniques

Todd is very knowledgeable about the pretreatment processes, and does good work. ADC is has some older equipment but seems to be in good working order.

Inspection Summary

The plant overall was in good shape with no changes from the last inspection.

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Permit No. 005  
Pace Industries

Mass limit and Production Information

Civil Engineering Associates  
10/20/2010

Table 1. Regulated Mass Limits 40 CFR 464.15 (c)&(h)

	AL Die Cast		Mold Cooling*	
	Max 1-Day (lb/M-lb)	Max Monthly Avg. (lb/M-lb)	Max 1-Day (lb/M-lb)	Max Monthly Avg. (lb/M-lb)
Copper	0.00660	0.00360	0.29700	0.16200
Lead	0.00680	0.00340	0.30500	0.15100
Zinc	0.00980	0.00370	0.44000	0.16600
Total Phenols	0.00740	0.00260		
TTO's	0.03080	0.01000	0.93500	0.30400
Alternate O&G	0.25900	0.08640	11.60000	3.86000

Table 2. Mass Limits Base on Production

	AL Die Cast		Mold Cooling		Combined	
	Max 1-Day (lbs/day)	Max Monthly Avg. (lbs/day)	Max 1-Day (lbs/day)	Max Monthly Avg. (lbs/day)	Max 1-Day (lbs/day)	Max Monthly Avg. (lbs/day)
Copper	0.00128	0.00070	0.05741	0.03131	0.05869	0.03201
Lead	0.00131	0.00066	0.05896	0.02919	0.03050	0.02985
Zinc	0.00189	0.00072	0.08505	0.03209	0.08695	0.03280
Total Phenols	0.00143	0.00050			0.00143	0.00050
TTO's	0.00595	0.00193	0.18074	0.05876	0.18669	0.06070
Alternate O&G	0.05007	0.01670	2.24228	0.74614	2.29235	0.76284

Table 3. Regulated Concentration Limits for Metal Finishing. CFR 433.16

	Max Day mg/l	Monthly Avg. mg/l
Cadmium	0.11	0.07
Chromium	2.77	1.71
Copper	3.38	2.07
Lead	0.69	0.43
Nickel	3.98	2.38
Silver	0.43	0.24
Zinc	2.61	1.48
Cyanide	1.20	0.65
TTO	2.13	
Oil and Grease	52	26
TSS	60	31
pH	6.0-9.0	6.0-9.0

Table 4. Zinc Die Casting Regulated Die Casting New Source CFR 464.46 (b)

	Max 1-Day (lb/M-lb)	Max Monthly Avg. (lb/M-lb)
Copper	0.00660	0.00360
Lead	0.00460	0.00220
Zinc	0.00660	0.00250
Total Phenols	0.00740	0.00260
TTO	0.01960	0.00640
Oil & Grease	0.25900	0.08640

Table 5. Zinc Die Casting Mass Limit Based on Production

	Max 1-Day (lb/day)	Max Monthly Avg. (lb/day)
Copper	0.00013	0.00007
Lead	0.00009	0.00004
Zinc	0.00013	0.00005
Total Phenols	0.00015	0.00005
TTO	0.00039	0.00013
Oil & Grease	0.00518	0.00173

Note: Sample Calculations can be found on page 4.

Zinc Production Data is based on Pace Industries Projection for Production.

Zinc Mold Cooling Operation is Non-Contact.

\* Mold Cooling wastestream is unregulated for phenols.

Table 6. Average Production

	Monthly (M-lbs/month)	Daily (M-lbs/day)
February	6.9	0.23
March	7.9	0.26
April	9	0.3
May	6.1	0.2
June	4.7	0.16
July	4	0.13
August	3.1	0.1
September	2.9	0.1
October	4	0.13
November	6.3	0.21
December	5.9	0.2
January	9.1	0.3
<b>AVERAGE</b>		<b>0.19333</b>

Table 7. Average Water Usage

	Outfall Flow (gpd)	Combined Mold Cooling and AI Die Cast Flow (gpd)	Non-Contact Cooling Water Flow (gpd)
February	28786	29886	1100
March	23648	24748	1100
April	25886	26986	1100
May	22373	23473	1100
June	18092	19192	1100
July	20479	21579	1100
August	18169	19269	1100
September	17685	18785	1100
October	15585	16685	1100
November	15357	16457	1100
December	15112	16212	1100
January	25974	27074	1100
<b>AVERAGE</b>	<b>20595.50</b>	<b>21695.50</b>	<b>1100.00</b>

NOTE: All data found in these tables is based on Pace Industries Monthly Reports (2/09-1/10).



Table 8. Concentration Limit Aluminum Die Casting Operation

	Max 1-Day (mg/l)	Max Monthly Avg. (mg/l)
Copper	0.32434	0.17691
Lead	0.16858	0.16495
Zinc	0.48053	0.18129
Total Phenols*	0.28577	0.09992
TTO's	1.03178	0.33545
Alternate O&G	12.66910	4.21597

Table 9. Concentration Limits From Zinc Finishing

	Max Day mg/l	Monthly Avg. mg/l
Cadmium	0.11	0.07
Chromium	2.77	1.71
Copper	3.38	2.07
Lead	0.69	0.43
Nickel	3.98	2.38
Silver	0.43	0.24
Zinc	2.61	1.48
Cyanide	1.20	0.65
TTO	2.13	
Oil and Grease	52	26
TSS	60	31
pH	6.0-9.0	6.0-9.0

*CFR 433?  
(Metal Finishing)*

*Take out*

Table 10. Concentration Limits From Zinc Die Casting

	Max 1-Day (mg/l)	Max-Monthly Avg. (mg/l)
Copper	15.82734	8.63309
Lead	11.03118	5.27578
Zinc	15.82734	5.99520
Total Phenols	17.74580	6.23501
TTO	47.00240	15.34772
Oil & Grease	621.10312	207.19424

Table 11. Combined Waste Stream

	Max Day mg/l	Monthly Avg. mg/l
Cadmium	0.11	0.07
Chromium	2.63	1.62
Copper	0.40	0.22
Lead	0.18	0.16
Nickel	3.78	2.26
Silver	0.41	0.23
Zinc	0.52	0.21
Cyanide	1.14	0.62
TTO	1.01	0.31
Oil and Grease	13.23	4.66
TSS	60	31
pH	6.0-9.0	6.0-9.0

**Sample Calculations  
Permit 005**

**Copper:**

Aluminum Die Cast Mass Limits Max 1- Day:

Mass Limit = pollutant regulation\* average production

Mass limit = (0.0066 lbs/M-lbs)\*(0.1933 M-lbs/day)

Mass Limit= **0.0012758 lbs/day**

Aluminum Die Cast Mass Limits Max Monthly Average:

Mass Limit = pollutant regulation\* average production

Mass limit = (0.0036 lbs/M-lbs)\*(0.1933 M-lbs/day)

Mass Limit= **0.0006958 lbs/day**

Mold Cooling Mass limits Max 1-Day:

Mass Limit = pollutant regulation\* average production

Mass limit = (0.297 lbs/M-lbs)\*(0.1933 M-lbs/day)

Mass Limit= **0.05741 lbs/day**

Mold Cooling Mass limits Max Monthly Average:

Mass Limit = pollutant regulation\* average production

Mass limit = (0.162 lbs/M-lbs)\*(0.1933 M-lbs/day)

Mass Limit= **0.0313 lbs/day**

Note: Production information was compiled from 6 months of data that was provided by Pace Industries. See Table 3 for these values.

Note: Daily Mass Limit Calculations were calculated using 40 CFR 403.6 (C) (3).

Note: Pollutant limits that were used can be found in Table 1.

**Combined Mass Limit:**

Combined mass limits were determined by summing the Aluminum Die Cast mass limits and Mold Cooling mass limits for Max 1-Day and Max Monthly Average.

Combined Mass Limit of Max 1-Day = **0.05869 lbs/day**

Combined Mass Limit of Max Monthly = **0.03201 lbs/day**

**Concentration Limits:**

Copper Concentration Limit Max 1-Day:

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

$$\text{Concentration} = \frac{(.05869 \text{ lbs/day})}{(.0216955 \text{ Mgpd} * 8.34)}$$

$$\text{Concentration} = \mathbf{0.324 \text{ mg/l}}$$

*Al Molding CFR 464*

*1)*

*2)*

Copper Concentration Limit Max Monthly Average:

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

$$\text{Concentration} = \frac{(0.03201 \text{ lb/day})}{(.0216955 \text{ Mggpd} * 8.34)}$$

$$\text{Concentration} = 0.1769 \text{ mg/l}$$

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

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

Note: The values for the other pollutants can be found in Table 5.

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

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

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

Copper Max 1-Day:

$$C_T = \frac{(15.82 \text{ mg/l} * 0.000001 \text{ Mggpd} + 3.38 \text{ mg/l} * 0.0007 \text{ Mggpd} + 0.3243 \text{ mg/l} * 0.0216955 \text{ Mggpd}) * (0.0223965 \text{ Mggpd} - 0.0011 \text{ Mggpd})}{(0.0216955 + 0.000001 + 0.0007) * 0.0223965 \text{ Mggpd}}$$

$$C_T = 0.39 \text{ mg/l}$$

Copper Max Monthly Average:

$$C_T = \frac{(8.63 \text{ mg/l} * 0.000001 \text{ Mggpd} + 2.07 \text{ mg/l} * 0.0007 \text{ Mggpd} + 0.176 \text{ mg/l} * 0.0216955 \text{ Mggpd}) * (0.0223965 \text{ Mggpd} - 0.0011 \text{ Mggpd})}{(0.0216955 + 0.000001 + 0.0007) * 0.0223965 \text{ Mggpd}}$$

$$C_T = 0.22 \text{ mg/l}$$

Note:  $F_D$  is the non-contact cooling water that comes in contact with the waste stream before pretreatment.