



ARNOLD ROGERS
Wastewater Systems Mgr.

CITY OF HARRISON
DEPARTMENT OF PUBLIC WORKS

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Frank C. Gelinis
Director of
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To: Allen Gilliam

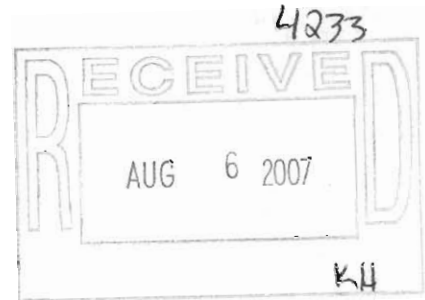
From: Rick Maples

Subject: My Recent Audit

Date: 08-06-07

Dear Allen

Hope you are enjoying your new digs. Attached to this letter are 7 pages. The first six have to do with my recent audit. They are not write-ups but merely comments of which I do not understand some of them. Should I be talking to Bruce instead of you? The last page has to do with our new permit. Any comments would be appreciated. Thanks. See you next week.



NPDES PERMIT FILE
 NPDES # AR0054321
 AFIN # 05-0054
 _____ Permit PN
 Correspondence
 _____ Technical Backup
8-6-2007 Date Scanned
 KH

ADEQ

ARKANSAS
Department of Environmental Quality



June 28, 2007

Mr. Arnold Rogers, Plant Superintendent
City of Harrison Wastewater Treatment Facility
P.O. Box 1715
Harrison, AR 72602

Re: AFIN: 05-00054; NPDES Permit No. AR0034321

Dear Mr. Rogers:

On May 8, 2007, I performed a pretreatment compliance inspection of your facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act and the regulations promulgated there under. I was accompanied by Mr. James Eng of US EPA Region VI who was there to provide oversight. This inspection revealed that you are in compliance with the terms of your permit.

If I can be of any assistance, please contact me at 870-446-6170.

Sincerely,

A handwritten signature in cursive script that reads "Bruce Kirkpatrick".

Bruce Kirkpatrick
District Field Inspector
Water Division

cc: Water Division Enforcement Branch

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H. EVALUATION AND COMMENTS

The facility appeared to be operating an effective pretreatment program. (1) It was noted that the control documents (permits) do not contain revocation clauses, (2) conditions prohibiting bypasses or right of entry for EPA Inspectors. (2) When determining whether an IU is a Significant Violator, the POTW is not performing/documenting the application of the Technical Review Criteria as required by the City's Sewer Ordinance 10.08.13. (3) Also, violators of numeric pollutant limits are not re-sampling in order to document permit compliance after problems are corrected. The facility is technically out of compliance until sampling and analysis shows that compliance has been re-attained.

1 A - Permit Need STATEMENT SUCH AS - CITY CAN TERMINATE PERMIT ANY TIME FOR NO REASON OR FOR ANY REASON - WE CAN DO THAT.

B - STATEMENT IN PERMIT STATING INDUSTRY CANNOT BY PASS PRETREATMENT FOR ANY REASON. WE CAN DO THAT.

C EPA INSPECTORS HAVE A RIGHT TO ENTER INDUSTRY.

2 - 10.08.13 ATTACHED - CLARIDGE OUTFALL #2 PERMIT & FACILITY CRITERIA WITH VIOLATIONS ATTACHED. I DO NOT UNDERSTAND HOW THIS IS A VIOLATION - HAVE ATTACHED VIOLATIONS ON 2 INDUSTRIES THAT HAD VIOLATIONS

3 - By the time the Resample gets to me The next month sample is done. (THIS WAS NOT A PROBLEM IN THE PAST WITH JAMIE (Name))

Claridge Products OF # 2

OUTFALL NO. 002 - REGULATED PROCESS WASTEWATER FROM PORCELAIN ENAMELING POINT SOURCE CATEGORY (STEEL BASIS MATERIAL): Process Wastewater regulated by National Categorical Standard for Porcelain Enameling - 40 CFR 466.15, Pretreatment Standards for New Sources. This outfall shall be monitored for the following listed pollutants, as set forth in Part II-Monitoring Requirements:

<u>Pollutant Parameter Average</u>	<u>Maximum for Any One Day</u>	<u>Maximum for Monthly</u>
Chromium, mg/l	0.10 ¹	0.04 ¹
Lead, mg/l	0.03 ¹	0.022 ¹
Nickel mg/l	0.32 ¹	0.167 ¹
Zinc, mg/l	0.27 ¹	0.112 ¹
pH, S.U.	6.0-10.0 ²	
Oil & Grease, mg/l	100 ²	
Temperature	150°F (66°C) ^{2,3}	
Daily Flows, gpd		
Outfall No. 002	Report	Report

¹ Pretreatment standard for new sources (40 CFR 466.15) with average daily flow of 30,000 gpd and maximum daily area processed or coated of 28,800 sq. ft. based on projected capacity of new process line as reported by permittee.

² Local Sewer Use Ordinances.

³ Claridge Products and Equipment, Inc. shall not discharge heat in amounts which in combination with heat discharged to the sewer from other sources will inhibit biological activity at the Wastewater Treatment Plant, thereby resulting in interference with the wastewater treatment processes.

JAN - MONTHLY DMR OK
Feb - " " NICKEL VIOLATION
MAR - NO Discharge

3

Free Ind

PERMIT NO. 005-05

PART I-EFFLUENT LIMITATIONS

OUTFALL NO. 001 - COMBINED WASTESTREAMS OF PRETREATED REGULATED WASTEWATER FROM ALUMINUM DIE CAST OPERATIONS AND NON-CONTACT COOLING WATER AFTER PRETREATMENT. Die cast process wastewater regulated by National Categorical Standard for Aluminum Die Casters - 40 CFR 464.15 (c) & (h), Pretreatment Standards for Existing Sources. Pretreated wastewater is discharged continuously from this outfall. This wastestream shall be monitored for the following listed pollutants, as set forth by Part II- Monitoring Requirements:

<u>Pollutant Parameter</u> <u>Average</u>	<u>Maximum for</u> <u>Any One Day</u>	<u>Maximum for</u> <u>Monthly</u>
Copper (T), mg/l	0.29 ¹	0.16 ¹
Lead (T), mg/l	0.15 ¹	0.15 ¹
Zinc (T)	0.42 ¹	0.16 ¹
Phenols (T), mg/l	0.35 ¹	0.12 ¹
TTO, mg/l	0.91 ¹	0.30 ¹
Alternate Oil & Grease mg/l	11.2 ^{1,2}	3.71 ^{1,2}
PH, S.U.	6.0-10.0 ³	
Oil & Grease, mg/l	100 ^{3,4}	
Temperature	150°F (66°C) ^{3,5}	
Daily Flows, gpd		
Al. Die Cast	Report	Report
Non-Contact Cooling	Report	Report
Outfall No. 001	Report	Report

¹ Combined Wastestream in accord with 40 CFR 403.6 (e), with process wastewater and dilution stream as follows:

JAN Monthly DMR OK
Feb " " ZINC VIOLATION
MAR " " " "

(H)

monitoring programs, and from City of Harrison inspection and sampling activities, shall be available to the public without restriction—unless the industrial user specifically requests, and is able to demonstrate to the satisfaction of the City of Harrison, that the release of such information would divulge information, processes or methods of production entitled to protection as trade secrets under applicable law. When requested and demonstrated by the industrial user furnishing a report that such information should be held confidential, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public, but shall be made available immediately upon request to governmental agencies for uses related to the NPDES program or pretreatment program, and in enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics and other "effluent data" as defined by 40 CFR 2.302 will not be recognized as confidential information and will be available to the public without restriction.

10.08.13 - PUBLICATION OF INDUSTRIAL USERS IN SIGNIFICANT NONCOMPLIANCE

The City of Harrison shall publish annually, in the largest daily newspaper published in the municipality where the POTW is located, a list of the industrial users which, during the previous 12 months, were in significant noncompliance with applicable pretreatment standards and requirements. The term significant noncompliance shall mean:

- (A) chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of wastewater pollutant measurements taken during a six-month period, as determined by EPA Region 6 criteria, exceed their Industrial User Permit daily maximum limit or average limit for the same pollutant parameter by any amount;
- (B) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a six-month period equals or exceeds the product of the Industrial User Permit daily maximum limit or the average limit multiplied by the applicable criteria [1.4 for BOD's TSS, fats, oils and grease, and 1.2 for all other pollutants except pH];

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3. Samples shall be taken on production and/or cleanup days. The day of the week on which the samples are taken may be varied and shall be determined by the Director of Public Works. Claridge Extrusions shall be notified by telephone of the selected sampling period, with follow-up documentation in writing.
4. The frequency of monitoring shall be monthly, unless the magnitude of potential effect of wasteloads and/or the results of monitoring indicate the need as determined by the Director of Public Works for more or less frequent monitoring. The frequency of compliance monitoring shall in no case be less than required for Categorical Industries by 40 CFR 403.12, twice per year in months of June and December. These samples shall be 24-hour composite samples except that temperature, pH, oil and grease, volatile organics, and cyanide shall be performed on grab samples.
5. The Claridge Extrusions monitoring point shall be:

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

6. In addition to effluent analytical results of permit-limited pollutants discharged to the Harrison Wastewater System, Claridge Extrusions shall submit monthly production data in M Off-lbs of: 1) aluminum extruded; 2) extruded sections phosphatized; and, 3) extruded sections anodized. Claridge also shall report total daily commingled process wastewater produced from aluminum extrusion operations, extruded section phosphatizing, and extruded sections anodizing at a point prior to pretreatment and total daily pretreated industrial process wastewater plus dilution water (unevaporated rainwater collected in decant ponds and sludge drying beds, at Outfall No. 001
7. Discharged Monitoring Reports shall be submitted to the Director of Public Works by the last day of the month following the month during which the data was obtained.
8. In compliance with 40 CFR 403.12 (g) (2), if sampling performed by Claridge Extrusions indicates a violation, Claridge Extrusions shall notify the Director of Public Works within 24 Hours of becoming aware of the violation. Claridge Extrusions industries shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Director of Public Works within 30 days after becoming aware of the violation.

THIS IS ALL IND PERMITS

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This page different Subject

DRAFT

Permit Number: AR0034321
Page 2 of Part III

water quality criteria and/or narrative criteria are determined to be the result of the permittee's discharge(s) to a relevant water body or a Total Maximum Daily Load (TMDL) is established or revised for the water body that was not available at the time of the permit issuance that would have justified the application of different permit conditions at the time of permit issuance.

7. Other Specified Monitoring Requirements

The permittee may use alternative appropriate monitoring methods and analytical instruments other than as specified in Part I Section A of the permit without a major permit modification under the following conditions:

- The monitoring and analytical instruments are consistent with accepted scientific practices;
- The requests shall be submitted in writing to the NPDES Section of the Water Division of the ADEQ for use of the alternate method or instrument.
- The method and/or instrument is in compliance with 40 CFR Part 136 or acceptable to the Director; and
- All associated devices are installed, calibrated, and maintained to insure the accuracy of the measurements and are consistent with the accepted capability of that type of device. The calibration and maintenance shall be performed as part of the permittee's laboratory Quality Control/Quality Assurance program.

Upon written approval of the alternative monitoring method and/or analytical instruments, these methods or instruments must be consistently utilized throughout the monitoring period. ADEQ must be notified in writing and the permittee must receive written approval from ADEQ if the permittee decides to return to the original permit monitoring requirements.

8. Contributing Industries and Pretreatment Requirements

- a. The permittee shall operate an industrial pretreatment program in accordance with Section 402(b)(8) of the Clean Water Act, the General Pretreatment Regulations (40 CFR Part 403) and the approved POTW pretreatment program submitted by the permittee. The pretreatment program was approved on 5/16/84 and modified on 8/6/98. The Sewer Use Ordinance and the Pretreatment Program have not been modified to come into compliance with the current 40 CFR 403 regulations. The permittee shall submit all necessary proposed modifications to ADEQ within twelve (12) months of the effective date of this permit. The POTW pretreatment program is



Allen. This is New Permit. Now Are We "NOT IN COMPLIANCE WITH CURRENT 40 CFR 403 REGS ?

(7)