

ADEQ

ARKANSAS
Department of Environmental Quality

July 21, 2008

Michael Lawrence
Plant Manager
Rogers Pollution Control Facility
4300 Rainbow Road
Rogers, Arkansas 72758-1440

Re: City of Rogers (NPDES #AR0043397; AFIN # 04-00155) Pretreatment Program Audit /
Municipal Pollution Prevention (P2) Assessment

Dear Mr. Lawrence:

Please find enclosed the finished report for the audit/assessment conducted May 13th through May 15th, 2008. The report with required actions and recommendations should be made available for review and discussion by appropriate City representatives. Please respond in writing within 30 days with proposed corrective actions.

Although Rogers has a relatively new Pretreatment Coordinator, he seems very involved and knowledgeable of the National Pretreatment Program and its implementation. This office is comfortable he'll be given the same resources to continue maintaining it efficiently.

This auditor was impressed with the professionalism exhibited by your personnel during the audit and industry site visits. They should be commended for their work ethics and performance.

Rogers seems to have successfully integrated P2 aspects into its Pretreatment Program. P2 assessment recommendations are meant to aid your Program to maintain this forward direction. The level of P2 activity within the City's Pretreatment Program is lauded.

It was a pleasure and learning experience working with the City's Pretreatment personnel during this event and becoming more familiar with Rogers, its Pretreatment and Pollution Prevention Programs and industries.

Feel free to contact this office with any questions.

Sincerely,



Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist/Attachments

cc: Rudy Molina/EPA 6WQ-PO
Eric Fleming/Inspector Supervisor
Cindy Garner/NPDES Enforcement

**PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT**

CITY OF ROGERS, ARKANSAS

NPDES PERMIT #AR0043397

July 18, 2008

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

IU Site Visit Summaries

Attachment(s) A: 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.

Pollution Prevention (P2) activities, now being strongly recommended to be fully integrated into Pretreatment Programs nationally, an assessment of cities' P2 programs will be made in conjunction with the audits.

An audit/assessment was performed May 13th through May 15th, 2008, of the Pretreatment and Pollution Prevention Programs implemented by the City of Rogers, Arkansas. Participants included:

Allen Gilliam	ADEQ / Pretreatment Coordinator
Paul Burns	City / Pretreatment Coordinator
Bob Winnes	City / Environmental Compliance Specialist

The goals of the audit/assessment were:

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

Rogers' Pretreatment Program was originally approved 1/13/84. An ordinance was adopted on 7/9/91, by the City to amend their code with the \$1000 penalty provision and was treated as a non-substantial modification.

Another partial modification submittal (4/22/96) included an enforcement response plan and revisions to the pretreatment ordinance. Evaluation of the local limits using current water quality criteria and EPA modification checklists were not included.

A final/complete modification with the maximum allowable headworks loading was submitted in 2005, reviewed, public noticed and approved on 11/1/06. This modification to their Pretreatment Program was not incorporated into their NPDES permit at that time and needs to be rectified.

The City's wastewater treatment plant has a design flow of 6.7 MGD and is tertiary Bardenpho treatment including advanced activated sludge, nitrification, de-nitrification, and phosphorous removal. The effluent is chlorinated then de-chlorinated. The city has highly automated the treatment facility and its collection system monitoring.

The plant is currently undergoing extensive upgrades which will result in its design capacity increasing to 14 MGD (See AR0043397C).

A current average effluent flow of 6.7 MGD is discharged to Osage Creek with the capability for approximately 20% of that to be discharged to a local golf course depending on the season. The effluent has demonstrated no toxicity in recent years.

Presently, the POTW receives approximately 0.98 MGD from 12 significant industries, 5 of which are categorical. 1462 dry metric tons of sludge per year is presently being sent to a local landfill.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to four (4) of their 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 -1 through A-10.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the city of Rogers. 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 Rogers' 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)(C)**: "...control mechanisms must contain...effluent limits based on...categorical pretreatment standards..." and under **40 CFR 403.6(e)(ii)** "Alternative mass limits" must be properly used in the combined wastestream formula (CWF).

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

During the file review, Kennametal's permit limits did not appear to be calculated correctly and

need to be revised. Being a production based categorical under CFR 471, hence converted to mass-based, it appears the CWF is not required. F_T (total IU flow) – F_D (dilution flows) = the summation of the regulated flows F_i . The second bracketed multiplier will be = 1. Regardless of the dilution flows from this facility, they are still bound to meet the regulated mass limits. The CWF is not necessary in this scenario.

[Note: It has been confirmed the “tripling” of regulated bath and rinse “credits” are allowable in their case, however. See Attachment A-5.]

2) Under **40 CFR 403.8(f)(2)(vi)**: “[the City’s] sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings...”

During the file review it was found that Superior’s chain of custody was not complete. The city must ensure its industries are supplying adequate compliance information. Analytical results from an incomplete chain of custody may not be considered valid in a court of law. See Attachment A-6g.

3) Under **40 CFR 403.12(b)(3)**: “*Description of operations.* The User shall submit a brief description of the nature, average rate of production... 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 not clear what was regulated or dilution wastestreams at all facilities. The City must require their permitted IUs to submit updated, more detailed, accurate schematics and a fairly comprehensive description of their wastewater generating processes. Acid/caustic baths/rinses should be delineated. Most industries have the capability to create computer automated drawings to depict these “schematics” without much effort. It would be beneficial for the industry representative to be intimately familiar with his wastewater generating processes and understand his facility’s plumbing.

Workpiece flow, P2 practices (counter current flows, ultrasonic cleaning, etc) and chemical storage areas should also be denoted. If these documents had been on file and current, there would not have been as much confusion determining dilution and regulated flows during the site visits.

Dump frequencies and volumes also could not be validated from the multitude of tanks and vessels at some of the industries. The City must have this information on file to require representative sampling and types (grabs vs. composite).

Any updates should be dated as to when they were last revised.

4) Under **40 CFR 403.8(f)(2)(v)**: “[the City will] Randomly sample...and conduct surveillance activities in order to identify **independent** of information supplied by industrial users, occasional and continuing noncompliance....”

During the file reviews and site visits to Kennametal and Pre-Formed Line Products (production based industries), it could not be ascertained if the City was verifying the production used to base

the industries' permit limits on. The City must document as practicable as possible, preferably during their industry inspections these type industries' production.

It's realized some facilities now use their internal computer networking to compile their daily production from station work orders. If this is the only way the City has to verify "independent of information" they supply, observing what's being internally reported on the facility rep's computer may be the only recourse to comply with this requirement.

5) Under **40 CFR 403.8(f)(2)(i)**, "Identify and locate all possible Industrial Users [IUs] which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request..."

And under **40 CFR 403.8(f)(2)(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 the Regional Administrator or Director upon request;"

During the audit interview, the City's pretreatment personnel indicated the "IU surveys were kept on a computer file and was an ongoing procedure". The year "2003" was mentioned as the last year one was documented. Since the last audit in 6/04, the POTW's server crashed losing a lot of information and the new Pretreatment personnel may just not know where a more recent survey "went".

The City must continue to send surveys to ANY non-domestic user that may be subject to CFR 403 and the Pretreatment Program. With the maturity of its P2 program, the other facilities the City needs to focus on should be their nursing homes, chiropractors, machine shops, x-ray clinics, auto body repair shops, lithographic screen printers, dentists, etc. Most of these small quantity dischargers may not be considered "significant IUs", but do have the opportunities for P2 and best management practices (BMPs).

6) Under **40 CFR 403.8(f)(2)(iii)**, "Notify Industrial Users identified under paragraph (f)(2)(i) of this section, of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act. Within 30 days of approval pursuant to 40 CFR 403.8(f)(6), of a list of significant industrial users, notify each significant industrial user of its status as such and of all requirements applicable to it as a result of such status."

And Under **40 CFR 403.12(p)**, "The Industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261..."

a) It was not apparent if the first notification was sent to all potentially effected IUs. Streamlining revisions to CFR 403 should have been sent as well as the requirement for their hazardous waste dischargers comply with 403.12(p).

b) An ADEQ haz. waste generators' list was supplied during the audit. These facilities as well as dentist offices, chiropractors, hospitals, x-ray clinics, film processors, veterinarians, nursing homes and pharmacies should be sent the notification as they are known potential discharges of haz. waste not being tracked by ADEQ as they are small quantity, conditionally exempt generators.

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

1) Include specific questions regarding chemical handling procedures in your IU inspection forms. Do the facilities move toxic/hazardous chemicals to various stations process stations via totes, forklifts, dollies, hand-carry buckets, hard line piping, etc?

2) More accurate descriptions of the IUs' manufacturing processes should also be included. It was noted in the inspections reviewed, other IU records (TOMPs, P2 plans, e.g.) "were on file at the City's office" which is adequate. The IU fact sheets which did include more details on the IUs' processes were not as comprehensive as this auditor would deem clear or "self-explanatory".

This is one of the reasons for requirement #3, **40 CFR 403.12(b)(3)** above. It's incumbent on your industries to supply you with pertinent information for accurate/valid permit limitations and verification of compliance.

3) IUs' permit language requires P2 requirements and reports due annually (See Attachment A-9 for example). This office lauds the city's attempts to encourage P2 via this mechanism.

This office would also suggest: a) adding energy saving/water conservation efforts as well as annual cost savings as two additional elements to report and; b) directing permitted and non-permitted IUs to the National Pollution Prevention Resource Exchange (P2Rx) system at <http://www.p2rx.org/>, specifically to the EPA Region 6 hub at <http://www.zerowastenetwork.org/> for maximum P2 networking which provides evolving practices/success stories and an IU "input" link for their personal entry of success stories.

Success stories from the City's P2 activities, integrated into its Pretreatment Program, will positively reflect the City is going beyond its regulatory minimum.

4) Recommend sending out pamphlets with water or sewer bills, outreach material regarding pharmaceuticals and the prohibition of flushing them into the sewer system.

Articles should also be sent to the local newspaper regarding pharmaceuticals passing though the wastewater treatment plant, possibly causing harm to aquatic life, wildlife and possibly human health.

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

- 1) The City's Pretreatment Program is not current with the Streamlining Revisions to 40 CFR 403. Program modification must be submitted and will be required upon NPDES permit renewal.
- 2) These modifications should include a revised maximum allowable headworks loading evaluation indicating whether local limits are necessary or not. Allowance will be given for current plant upgrades to be completed and static conditions reached before representative site specific sampling must begin.

Recommend revising the Pretreatment Ordinance to include a specific prohibition against discharge of any pharmaceuticals into the City's sewage collection system.

* * * * *

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 18-26

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Rogers NPDES #: AR0043397
 Mailing address: 4300 Rainbow Road, Rogers 72758-1440

Permit Signatory: Tom McAlister Title: Utilities Manager

Telephone: 479.621.1142 FAX NUMBER: 479.621.1146

Pretreatment Contact: Paul Burns Title: Pretreatment Coordinator

Address: same

Telephone: 479.273.7378 Ext: 109 fx: 479.273.7627

e-mail PaulBurns@RWU.ORG

Pretreatment program approval date: 1/13/84

Dates of approval of any substantial modifications: 11/1/06

Month Annual Pretreatment Report Due: January

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 5/13 -15/08
 (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>Paul Burns</u>	<u>Pretreatment Coordinator</u>	<u>Same</u>
<u>Bob Winnes</u>	<u>Environmental Compliance Specialist</u>	<u>"</u>

* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>12/06</u>	<u>pH sampling problems (no dups) at 2 IUs</u>
<u>(Could not locate any previous ones because of new scanning "practice")</u>		

YES NO

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

If yes, describe the required corrective action: _____

 Is the Control Authority currently in SNC* or RNC?

.....

The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with an asterisk or footnote that tells that there is more explanatory information and where it can be found.

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
*AR0043397	Rogers Pollution Control Facility	3/1/06	2/28/11
AR0043397C	" " Construction Permit	6/30/07	"

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Same
 Location Address: same

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 6.7 MGD; Actual (Average)- 7.1 MGD

Sewer System: 100 % Separate; 0 % Combined,
 # of SSOs due to grease blockages 2 from 1/07 thru 5/08

Industrial Contribution to this Treatment Plant

of SIUS : 12 # of CIUS : 5
 Industrial Flow (mgd): 0.98 Industrial Flow (%) : 13.8 %

Level of Treatment Type of Process(es):
 Primary _____ (Major upgrades currently in progress. On line before '09?)

Secondary Bardenpho which includes advanced activated
 sludge, nitrification and de-nit.; phos. removal

Tertiary and aeration

Method of Disinfection: Chlorination

Dechlorination YES NO

Effluent Discharge

Receiving Stream Name: Osage Creek then to the Illinois River
Ozark Highland, perennial fishery

Receiving Stream Classification: Segment 3J of Arkansas Riv. Basin

Receiving Stream Use: fishable/swimmable; primary contact recreation

If effluent is disposed of to any location other than the receiving stream,
 please note: Pinnacle Golf Course - "C" Lake

Method of Sludge Disposal:	Quantity of Sludge:
_____ Land Application	_____ dry tons/yr.
_____ Incineration	_____ dry tons/yr.
_____ Monofill	_____ dry tons/yr.
<input checked="" type="checkbox"/> Mun. Solid Waste Landfill	<u>1462</u> dry tons/yr. (Metric)
_____ Public Distribution	_____ dry tons/yr.
_____ Lagoon Storage	_____ dry tons/yr.
_____ Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals, NH3-N, TRC & T.Phos

a. (continuation of individual treatment plant information for Rogers Pollution Control Treatment Plant.)

YES NO

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

✓

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

List pollutants that are specified in current NPDES permit:
Ref. to CFR 503, As, Cd, Cu, Pb, Hg, Ni, Se, Zn, TKN, P, K, Mg & PCB

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?) Only one sub-lethal effect for the C.Dubia during the 3rd quarter of '06.

—

✓

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>9</u>	<u>9</u>	<u>4</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>1</u>	<u>—</u>

Other: (TSS, T.Phos., NH3, Ortho-Phos., TKN, Nitrite + Nitrate) 52 ISCOs were set up to collect composites during rain events upstream & downstream in '07 only.

* 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.

TSS & CBOD effluent shows an increase related to flow; NH3 fairly static; T.Phos effluent shows an increase in concentration but flow/Influent loadings decreasing

YES NO N/A

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

✓

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

✓

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

Parameters Violated

Cause(s)

none

YES NO

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

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.

Updated Program elements including a revised Pretreatment Ordinance, a revised ERP, a re-evaluation of their MAHL and the need for local limits was submitted, reviewed, approved but not incorporated into their NPDES permit. This needs rectified.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
11/1/06	See above	11/1/06

2. Modifications in Progress:

Date Requested	Nature of Modification
N/A	Currently reviewing "Streamlining" req'd mods and organizational hierarchy changes for future mod submittal.

YES NO

Have any changes been made to any pretreatment program components (excluding any listed above)? If yes: non-substantial organizational changes. Currently reviewing applicable "streamlining" revisions.

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: 1/13/84 [WENDB-PTIM]
 Date of most recent Ordinance approved by the Control authority: 12/14/04
 Date of most recent Pretreatment Program modification approval: 11/1/06

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

YES NO

- Deny or condition pollutant discharges
- Require compliance with standards
- Control discharges through permit or similar means
- Require compliance schedules and IU reports
- Carry out inspection and monitoring activities
- Obtain remedies for noncompliance
- Comply with confidentiality requirements
- Establish Pollution Prevention
- Has the city developed and adopted a Pollution Prevention policy?

* Although it is one of the new Ordinance's purposes/objectives

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

 Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no: (**accepting landfill leachate from a facility that is not within the city's limits*)

 Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions? (**city has negotiated all legal agreements with operator.*)

n/a Have provisions been made for the incorporation of Pollution Prevention (P²) policies by contributing jurisdictions?

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

<u>Name of Jurisdiction</u>	<u>SIU</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1. <u>Waste Management Services</u>		<u>N/A</u>	<u>"</u>	<u>Permit</u>
2. _____		_____	_____	_____
3. _____		_____	_____	_____
4. _____		_____	_____	_____

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

Problems

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

Briefly describe other problems: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

IU Name	Problem	NPDES Permit Violation	
		Yes	No
None			

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)] (latest [2003] survey is electronic)

If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P² activity?

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

If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P² activity and the distribution of P² reference materials to the IUs which qualify?

What methods are used to update the IWS:

- Review of newspaper/phone book
- Review of plumbing/building permits
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) Questionnaires, city business license, chamber of commerce business listing

How often is the survey to be updated? Ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: none apparent

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?
*Name change only from Fibretech to Strateline		Yes

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

- a. 12 SIUs (As defined by the Control Authority) [WENDB-SIUS]
 - b. 5 Categorical Industrial Users (CIUs) [WENDB-CIUS]
 - c. 7 Noncategorical SIUs
 - d. 8 Other regulated nonsignificant IUs (Describe) septage haulers (5), transfer station runoff, landfill leachate hauler and Cryovac
- 20 TOTAL of a. + d.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

~~If not, the Control Authority has defined "significant industrial user" to mean:~~
* Permittees are required to review and re-submit P2 plans annually. City now includes requirement to report additional P2 activities & goals

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?
**permits require P2 and water conservation/waste minimization plans*
 Describe the Control Authority's approved control mechanism (e.g., permit, etc.): Permit

What is the maximum term of the control mechanism? 3 yrs

- 0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

<u>IU NAME</u>	<u>PERMIT EXPIRATION DATE</u>
<u>N/A</u>	

YES NO

- Does the Control Authority accept trucked septage wastes?
- Does the Control Authority accept other trucked wastes?
- Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

- YES NO
- Does Control Mechanism designate a discharge point? [403.5(b)(8)]
- 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:

<u>Pollutant</u>	<u>Limit</u>
<u>Permits reference the city ordinance, CFR 261 (Haz. Waste reg. Limits) and requires reporting for numerous parameters. No surcharges for TSS or CBOD.</u>	

Describe the discharge point(s) (including security procedures):
At the treatment plant's division box where it can be "held" and bled in at a more convenient time. Dumps are witnessed by city personnel.

- Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes? *Ordinance does allow for special exceptions.*
- Does the Control Authority have a control mechanism for regulating wastes from UST sites?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

Pollutant	Limit
n/a	

G. Application of Pretreatment Standards and Requirements

YES NO

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

~'99 Date Notified Letter Method of Notification

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

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

YES NO

Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit or Annual Report? *City will re-evaluate MAHLs once upgraded plant is finished and at static conditions, sometime near the end of '08.*

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
A re-evaluation was conducted on all the pollutants of concern. Very little change had to be made from the '00 numbers.			

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		11/06 developed MAHLs (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 checked="" type="checkbox"/>	<input type="checkbox"/>	0.025
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.019
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.528
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.678
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.027
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.071
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.00005
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.053
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.019
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.016
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.1
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.5

* - If necessary for the sludge disposal option chosen.

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:

City personnel have attempted to identify basis for the two parameters' TBLs

POLLUTANT	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
T. Phos		<input checked="" type="checkbox"/>		?		<input checked="" type="checkbox"/>	n/a
Nitrogen		<input checked="" type="checkbox"/>		?		<input checked="" type="checkbox"/>	n/a

YES NO

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

*City has requested P2 practices at IUs with Phos. and Nitrogen containing wastewater and are required to report for these parameters.

What method of allocation was "would be" used for local limits for each pollutant that has a local limit in-place?

	TYPE OF ALLOCATION		
	<u>Uniform Concentration</u>	<u>Mass</u>	<u>Hybrid</u>
Arsenic (As)			
Cadmium (Cd)			
Chromium-Total			
Copper (Cu)			
Cyanide (CN)			
Lead (Pb)			
Mercury (Hg)			
Molybdenum (Mo)			
Nickel (Ni)			
Selenium (Se)			
Silver (Ag)			
Zinc (Zn)			
	<u>Not specified</u> in newest version of Program, page 33.		

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Actual</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
Inspections:				
CIUs	<u>1/yr</u>	1/yr	1/year	_____
Other SIUs	<u>"</u>	"	1/year	_____
Sampling:				
CIUs	<u>1/yr</u>	2/yr	1/year	<u>"Just keeping</u>
Other SIUs	<u>"</u>	2/yr	1/year	<u>their IU's on</u>
				<u>their toes"</u>
Reporting:				
CIUs	<u>4/yr</u>	4-12/yr	2/year	<u>"</u>
Other SIUs	<u>"</u>	"	2/year	<u>"</u>
Self-Monitoring:				
CIUs	<u>4/yr</u>	4-12/yr	2/year	<u>"</u>
Other SIUs	<u>"</u>	2-52/yr	2/year	<u>"</u>

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

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?
 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</u>	<u>Environmental Testing Group</u>
Cyanide	<u>Spectrophotomer</u>	<u>Environmental Services Corp.</u>
Organics	<u>GC/MS</u>	<u>ESC</u>
Other	<u>Biomonitoring</u>	<u>Ark. Analytical Inc.</u>
	<u>O&G, Phenols</u>	<u>ESC</u>
	<u>Conventionals</u>	<u>ETG, ESC & the city's lab+</u>

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

+ RWU's lab is state certified

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe:
Split samples and uses EPA QA samples, has written QA plan, QC requirements, sample custody and handling procedures & QA objectives.

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

1 wk Conventionals
2 wk Metals
4 wk Organics

Is there an established protocol clearly detailing sampling location and procedures?

Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: _____

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

YES NO

Scheduled compliance monitoring (for batch discharges)
 Unscheduled compliance monitoring
 Demand monitoring for IU compliance
 IU self-monitoring
 Other: _____

YES NO

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

I. ENFORCEMENT

YES NO

Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)] **Not with the current streamlining version.*

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

- Notice or letter of violation
- Setting of compliance schedule
- Injunctive relief
- Administrative Order
- Revocation of permit
- Fines (maximum amount):
 - civil \$ 1000 /day/violation
 - criminal \$ 1000 /day/violation
 - administrative \$ /day/violation
- Imprisonment
- Termination of Service
- Other: _____

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

YES NO

- When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
- Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].
 Comment: plus, given 5 days to send a description of the cause of violation and provide a written corrective action plan (permit requirement)
- n/a If no, does the Control Authority conduct all of the monitoring?

YES NO N/A

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

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Date	Return to Compliance?	
				Yes (Date)	No
Model Laundry	1 st Quarter '07	NOV	?	✓	?
(Currently have on order newer O&G removal equipment)					

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

#	%	
1	8	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [WENDB-MSNC]
0	0	Reporting requirements [WENDB-PSNC]
0	0	Pretreatment compliance schedule [WENDB-SSNC]
0	0	How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

Has the Control Authority experienced any of the following:

YES NO

EXPLAIN and ID Industrial User

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

YES NO

Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]

0 How many SIUs are currently on compliance schedules?

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

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

	<u>Number</u>	<u>Amount</u>
Civil	0	\$ _____
Administrative	0	\$ _____
Total	0	\$ _____ [WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

- YES NO computerized
- YES NO hard copy
- OTHER: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

- | <u>YES</u> | <u>NO</u> | |
|-------------------------------------|--------------------------|----------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Control Mechanism Issuance |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Inspection and Sampling schedule |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Monitoring Data |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | IU Compliance Status Tracking |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other: _____ |

Can IU monitoring data can be retrieved by:

- | | | |
|-------------------------------------|--------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Industry name |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Pollutant type |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Industrial category or type |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | SIC/NAICS Code |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | IU discharge volume |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Geographic location |
| <input type="checkbox"/> | <input type="checkbox"/> | Receiving treatment plant (i.e.if > one plant in the system) |
| <input type="checkbox"/> | <input type="checkbox"/> | 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?
IU must send letter w/documents requesting confidentiality. This info is not made available to the public but, to government agencies.

Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: Nutrients' issue with neighboring state may have an impact on the city with regard to permit limits & TBLs

Are all records maintained for at least 3 years?

K. RESOURCES

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

1.5 FTEs, 1 full time coordinator and now, only 1/2 FTE split between a lab tech and their grease program coordinator (who'll soon be moved to the city's engineering department). This is down from the previous 3.5 FTEs.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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:
*Seems there were some administrative deficiencies that could have been avoided if the previous Pretreatment Coordinator would have been more focused on the strict implementation of basic CFR 403 elements

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

(Resources)
 Is funding expected to continue near the current level? If no, will it: Increase _____ or Decrease
 If no, describe the nature of the changes:
The grease abatement person will be moved to the city's engineering department and lab personnel will no longer report to the Pretreatment Coordinator

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

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

Does the Control Authority have access to adequate:

YES	NO		<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	<u>5 Isco samplers, 2 pH meters & 2 DO meters</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	<u>Standard</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	<u>Pick-up now shared by all other POTW personnel</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	<u>General lab equipment</u>

RWU's lab is certified by ADEQ also.

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
Permits require P2 plans. They must address waste minimization plans, water conservation and P2; created state's first household haz. waste center with roundups; P2 seminars; hosted industry-specific P2 workshops; organized commercial carpet cleaners workshops and have maintained an aggressive grease trap program.

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:
2 day outdoor school for 6th graders.

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

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
No, but see comment #1 above. Both the IU and the City reviews the plan yearly and make necessary changes to improve and address all environmental areas. Several IUs have initiated the ISO 140001 process or are already certified.

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? Yes
If yes, which of the "Guides to Pollution Prevention" were used? This was done _____ years ago. Applicable P2 guides were sent to various industries.

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Superior File/ID No. 07-SII
Industry Address 1301 N. Dixieland Rd.
Industry Description Mfg. of aluminum wheels (casting and finishing)
Industrial Category Metal Finishing 40 CFR 433 SIC/NAIC Code: 3714/336399
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 52,000

Industry visited during audit: YES

Comments: Casting ops produce no CFR 464 regulated wastewater. Questions about the actual volume of their CFR 433 regulated w.w. flow.

FILE #: 2 Industry Name Preformed Line Prod. File/ID No. 07-PLP
Industry Address 2740 South 1st Street
Industry Description Utility pole line hardware, mainly wire products
Industrial Category Metal finishing 40 CFR 433 SIC/NAIC Code: 3644/335932
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 4,900

Industry visited during audit: YES

Comments: -8,000 lbs/day drawn

FILE #: 3 Industry Name Kennametal File/ID No. 07-KMT
Industry Address 205 N. 13th Street
Industry Description Tungsten/Carbide Sintering
Industrial Category Non-Ferrous Metals Forming 40 CFR 471 SIC/NAIC Code: 3545/333515
Ave. Total Flow (gpd) 20,000 Ave. Process Flow (gpd) ?

Industry visited during audit: YES

Comments: They make the cylindrical-like blanks for other facilities to finish them into products such as cutting tools and drills

FILE #: 4 Industry Name Model Laundry File/ID No. 07-MLD
Industry Address 221 W. Elm Street
Industry Description Industrial Laundry
Industrial Category N/A 40 CFR N/A SIC/NAICS Code: 7211/812320
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 8,600

Industry visited during audit: YES

Comments: Has had some O&G problems in the past which they're addressing at the moment

FILE #: 5 Industry Name _____ File/ID No. _____
Industry Address _____
Industry Description _____
Industrial Category _____ 40 CFR _____ SIC Code: _____
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) _____

Industry visited during audit: YES NO

Comments: _____

A. Industrial User Characterization

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Is the IU considered "significant" by the Control Authority?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Is the user subject to categorical pretreatment standards?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>No</u>	<u> </u>
a. New source or existing source (NS or ES)?	<u>NS</u>	<u>ES</u>	<u>ES</u>	<u>N/A</u>	<u> </u>
b. Is this IU one identified as having P ² potential?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
B. <u>Control Mechanism</u>					
1. Does the file contain an application for a control mechanism?	<u>2</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
If yes, what is the application date?	<u>10/05</u>	<u>9/06</u>	<u>10/05</u>	<u>10/05</u>	<u> </u>
Does it ask for Pollution Prevention information?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Does the file contain a Permit?	<u>3</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Permit Expiration Date?	<u>12/09</u>	<u>12/09</u>	<u>12/09</u>	<u>12/09</u>	<u> </u>
Is a fact sheet included?	<u>4</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)] (See Attach. A-2 for example)					
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>

Comments: 1) All permits require P2 practices (See Attach. A-2aa for example); 2) See Attach. A-1 for example; 3) See Attach. A-2 for example; 4) See Attach. A-3 for example

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
d. Appropriate discharge limitations?	<u>6</u>	<u>2</u>	<u>3</u>	<u>✓</u>	<u> </u>
e. Appropriate self-monitoring requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
g. Sampling locations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
i. Types of samples (grab or composite) for self-monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Civil and Criminal Penalty provisions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Revocation of permit?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
l. Compliance schedules/ progress reports	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
m. General/Specific Prohibitions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u> </u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>✓</u>	<u>✓</u>	<u>3</u>	<u>✓</u>	<u> </u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u> </u>

Comments: 1) City has an "emergency suspension" clause instead; 2) Production varies so much, the IU's limits are calc'd each reporting period (See Attach. A-4d for example); 3) Questionable limit calcs. using the CWF for mass (See Attach. A-5d&e for example); 4) "technologically and economically achievable" doubtful, their permitted SIUs are just required to implement/report P² practices and progress; 5) Some streamlining revisions were mentioned during their annual IU meeting and permits were changed to reflect some grab monitoring requirements but, the entire "Streamlining Rule" was not made "public" to their permitted IUs; 6) Questionable non-regulated wastewater streams being sampled along regulated ones for compliance with CFR 433. See Attachment A-7h for city's description of "process water".

SECTION III: INDUSTRIAL USER FILE REVIEW

NOIT323

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

Comments: 1) See comment #3 on previous page; 2) IU's C of C not complete (See Attach. A-6g for example - missing sampler's name. This deficiency located on SIU's report.)

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>3</u>	<u>1</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
<u>Inspections</u>					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>4</u>	<u> </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Date of last Inspection	<u>8/07</u>	<u>11/07</u>	<u>11/07</u>	<u>9/07</u>	<u> </u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)] (See Attach. A-7 for example)					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Verification of production rates?	<u>n/a</u>	<u>no</u>	<u>no</u>	<u>n/a</u>	<u> </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>✓</u>	<u>2</u>	<u>2</u>	<u>✓</u>	<u> </u>

Comments: 1) IU chose O&G alternative; 2) City needs to verify independently, their production-based IUs' production during inspections; 3) IU has submitted a TOMP but is still conducting TTO monitoring. Last year's results show all ND numbers except for trace amounts of chloroform, toluene & Bis(2-ethylhexyl)phthalate.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
f. Evaluation of pretreatment facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
g. Evaluation of self-monitoring equipment and techniques?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
i. Manufacturing facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
j. Chemical handling and storage procedures?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
k. Chemical spill prevention areas?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
l. Hazardous waste storage areas and handling procedures?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u> </u>
m. Sampling procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
n. Laboratory procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
o. Monitoring records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
p. Evaluation of Pollution Prevention opportunities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
q. Control Authority inspector signature?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>

IU Self-Monitoring and Reporting

10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
11. Does the file include:					
a. BMR?	<u>arch.</u>	<u>arch.</u>	<u>arch.</u>	<u>n/a</u>	<u> </u>
b. 90-Day Report?	<u>arch.</u>	<u>arch.</u>	<u>arch.</u>	<u>n/a</u>	<u> </u>
c. All periodic reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>

Comments: 1) City has conducted one but, requires IUs to submit one regardless of potential (See Attach. A-10 for example); 2) Chem. handling could be more descriptive

SECTION III: INDUSTRIAL USER FILE REVIEW

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

E. Enforcement

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

SECTION III: INDUSTRIAL USER FILE REVIEW

SECTION

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>1</u>	<u>0</u>	<u>6</u>	<u> </u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u> </u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u> </u>
5. Were all nondischarge violations identified in the file?	<u>1</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u> </u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/a</u>	<u>not nec.</u>	<u>not nec.</u>	<u>✓</u>	<u> </u>
8. Did the Control Authority follow its approved ERP?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>2</u>	<u> </u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
11. Were there any compliance schedule violations?	<u>--</u>	<u>--</u>	<u>--</u>	<u>-</u>	<u> </u>

Comments: 1) See attachment A-8 for example SOP; 2) Facility has on order more advanced pretreatment (Oil/Water separator) equipment to eliminated excursions.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. TRC	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Pass through/Interference	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Spill/slug loads	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
e. Reporting	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
f. Compliance schedule	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
g. others (specify)	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
13. Was the SIU published for SNC?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u> </u>
Date of publication.	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>1/08</u>	<u> </u>

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Rogers NPDES #: AR0043397

Date of Audit: 5/13 - 15/08 Date entered into QNCR: 7/18/08
(ASSESSMENT)

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

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PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Rogers NPDES #: AR0043397

Name, address and phone number of industry:
 Superior Industries, 1301 N. Dixieland Rd, 479.631.8037

Type of industry: Mfg. Al wheels Date/Time of visit:
 CFR 433 5/15/08 / 9:40 a.m.

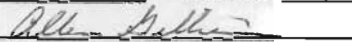
Industry contacts: Les Baker / Human Resources Mngr. &
 Darren Hixon

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

*See Attachment A-9 for their P2 plan and activities

Additional comments:
 Facility manufactures aluminum wheels for the auto industry. Raw material comes in the form of aluminum ingots which are melted down and poured into one of the ten (10) self-contained molding units. Continual preventative maintenance is conducted to reduce any hydraulic leakage which, if occurs, is self contained in trays beneath the casting equipment. Negligible wastestreams are generated in the this operation. Questions about the wheels' cooling wastewater were addressed and answered. It should not be considered a "quench" tank and not subject to the die casting regs under 464.12(b). Confusion here also about whether this cooling water tank is ever dumped but just make-up water (R/O) added. Facility no longer chrome plates any of its product. The process has been removed for over two years and no longer has pretreatment after removal of the Cr plating/anodizing processes. Only pH has to be adjusted before discharge.

Visit conducted by: Gilliam/Burns Date: 5/15/08


 (signature of auditor conducting visit)

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

Control Authority: City of Rogers NPDES #: AR0043397

Industry name: Superior Industries

Additional comments:

Wheels are heat treated, quenched (3 connected tanks and it wasn't clear if these were ever dumped either), sent thru powder coat painted. Wheels are painted first then sent through various machining operations to fit customers specs, then back through "clear coat". Each of these machining stations are self-contained with synthetic coolant/cutting fluids and tramp oils filtered for extending life cycle. It was estimated the "coolant" system held about 26,000 gallons. Supposedly, none of this machining coolant fluid is dumped to the city. "About once/year, it is hauled off-site by US Filters."

[The following may not be a very accurate or, in correct order description. Schematics were not clear enough to follow.]

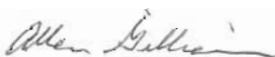
The cleaning operation begins with a 4 stage alkaline/alkaline/rinse/rinse system. Every week the rinses are dumped. Following is another caustic cleaning system which is dumped about every 3 months after neutralization. The following rinse is drained once/week. Following that rinse is an acid etch (nitric, hydrofluorosilic and sulfuric acids) and another rinse. R/O water is used for make-up in the cleaner system. Some rinses are counter-current flowed for make-up water. A "gardobond" stage follows for corrosion inhibition and enhanced adhesion properties.

The R/O backflush (with acid then caustic) was questioned because it would be considered dilute (See Attach. A-1c for comment on this). Facility rep. was unsure of its volume discharged and frequency.

Questions were raised about the wastewater discharged, whether it should be adjusted by the combined wastestream formula for dilution streams. The number and configuration of tanks in the cleaning/paint-prep systems and different dump periods made for a confusing walk through visit.

City needs to require this IU to submit an accurate process narrative and a schematic indicating location of all wastewater generating processes, product flow and schedule of dumps from each tank.

Visit conducted by: Gilliam/Burns Date: 5/15/08



(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Rogers NPDES #: AR0043397

Name, address and phone number of industry:
Preformed Line Products, 2740 S. First Street, 479.636.7600

Type of industry: Aluminum Forming Date/Time of visit:
(CFR 467.55) 5/14/08 / 11:05 a.m.

Industry contacts: Steve Renfro / Sr. Industrial Engineer

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

Additional comments:

IU manufactures components for outdoor utility pole electrical connections (non-current carrying), guy wire anchors and rubber molded splice cases for underground applications. The core operation that captures this facility under CFR 467 is the aluminum drawing with neat oil operation.


Facility has made a very few changes since the previous audit in 6/04. They have rubber injection molding lines with "chiller" non-contact cooling water.

Other raw material comes in the form of centrifugally and continuous cast aluminum wire rod in coils, some galvanized.

Wastewater generating processes include alkaline wash/rinse lines for both galvanized and aluminum wire.

All floor drains in the processing areas are sealed.

Visit conducted by: Gilliam/Burns Date: 5/14/08



(signature of auditor conducting visit)

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

Control Authority: City of Rogers NPDES #: AR0043397

Industry name: Preformed Line Products

Additional comments:

IU draws (10 total stands, 7 in use at this time) most but, not all wire which leaves as their end-product. Obviously, there's more wire cleaned and rinsed than "formed".

Lubricants in this process are periodically sent off site and replaced. Wire that is rough drawn, sent thru heat treatment (4 ovens) followed by quench tanks then back to the final "fine draw" for desired diameter. The quench tanks are not dumped until time for re-painting which is about every 5 years.

Production based standards and the facility's practice of batch discharging baths and rinses at different frequencies, as well as fluctuating production rates complicated their limits' calcs. IU's permit reflects limitations based on the facility's dynamic production and are calc'd monthly. (See Attach. A-4c & d)

The galvanized steel wire wash (13 to 14 pH) water was earlier determined not to be covered under the CFR 467 effluent guideline and is not considered an "un-regulated wastestream" under CFR 403.6 even for Zn. That wastestream is not sent through pretreatment nor monitored. City rep indicated he'd do some separate monitoring of this wastestream to determine what levels of Zn might be present. It's dumped about once/month.

Other processes with no wastewater generated included the forming of stainless steel round splice cases. A neoprene rubber compound is thermoset into them for underground wire splices. Other operations included cutting, twisting, braiding and forming of wires into shapes necessary for field installation.

IU's pretreatment consists of all reg'd wastewater being sent to a holding tank, basic chemical precipitation, sludge press dewatering, and pH adjustment before batch discharge to the city. Facility rep indicated they were looking at upgrading their old ('91) pretreatment system sometime in '09.

An updated and more descriptive narrative of entire processes and schematic was requested at the end of the site visit.

Visit conducted by: Gilliam/Burns Date: 5/14/08



(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Rogers NPDES #: AR0043397

Name, address and phone number of industry:

Model Laundry & Dry Cleaners, 221 Elm Street 479.636.2525

Type of industry: Industrial Laundry Date/Time of visit:
5/15/08 / 8:30 a.m.

Industry contacts: Art Stout - Operations Mngr. / Steve Ash - President

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

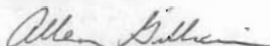
Additional comments:

Facility dry cleans as well as launders for "industrial" customers (restaurants linens, table cloths, "grill belts(?)", uniforms, etc.). ~35% is from the grilling belts which are the most greasy of their laundered product.

This IU's process is not any different than other typical industrial laundries.

They have 9 washers and 5 driers for commercial linens with three other smaller driers for their "fluff" items which go back to Drs. and DDs.

Visit conducted by: Gilliam/Burns Date: 5/15/08



(signature of auditor conducting visit)

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

Control Authority: City of Rogers NPDES #: AR0043397

Industry name: Model Laundry & Dry Cleaners

Additional comments:

The dry cleaning ops are completely closed loop. A petroleum based solvent is now used.

Soaps and starch (chem. storage) is kept in a separate room and are automatically fed (by hose) as needed to appropriate machine. Some starch is hand carried in buckets. Anything spilled in this area would drain into sump, then to pretreatment.

All wastewater from the laundry is sent to a tank where the pH is controlled, then thru mixing tubes where coagulants and air are mixed, then to their DAF solids separator. The stainless steel oil skimming tank is where the cationic and anionic polymers are added. An "arm" skims the top of this tank removing oils from the surface of this small tank.

They've been having trouble meeting O&G limits and are planning on installing a bigger, more efficient skimming device.

Sulfuric acid is used for final pH adjustment and then discharged to the City.

Overall cleanliness of the "pretreatment" part of the facility is fairly poor but does not appear harmful to employees.

City personnel is familiar with facility's ops.

Visit conducted by: Gilliam/Burns Date: 5/15/08



(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Rogers NPDES #: AR0043397

Name, address and phone number of industry:
 Kennametal Inc., 205 N. 13th Street 479.621.4726

Type of industry: NonFerrous Metals Forming Date/Time of
 And Metal Powders (CFR 471.54) 5/14/08 / 2:25 p.m.

Industry contacts: Tim Bair - Env., Health & Safety Mngr.

	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"/>

*IU is very careful to capture/recycle its tungsten carbide

Additional comments:

Facility manufactures "blanks" for metal cutting tools, drills and other wear parts from their raw material, cemented tungsten carbide.

Blending of the powders, pressing, forming, sintering, finishing and coating of their semi-finished product makes up the majority of their processes.

These blanks are sent to outside facilities to "finish" for their end products.

Visit conducted by: Gilliam/Burns Date: 5/14/08



(signature of auditor conducting visit)

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

Control Authority: City of Rogers NPDES #: AR0043397

Industry name: Kennametal Inc.

Additional comments:

The facility does have employee training on handling of any chemicals on-site.

Non-ferrous powders are blended, then to a press/formed, then to a shaping operation before they are sintered in the ovens. Finished/sintered parts are sent thru 10 wastewater generating stages: 2 alkaline washes for gross oil removal, rinsed, an acid etch bath, a citric acid (5%) bath, acid rinse, alkaline etch (oakite liquid rust preventative), alkaline etch rinse, 1st, 2nd & 3rd stage rinses, followed by nitrogen "blow-off", then a drier stage, then a final graphite coating line and thru an oven. More P2*: They use ultrasonics cleaning. Counter current flows are used throughout to conserve water. Heated baths and rinses are also used. Metering valves were also installed to conserve water from too much overflow. "De-I" water is used for make-up water for the whole line. An arc-ion plating system for some parts is also in use which produces no wastewater.

Sample collection techniques were discussed and appeared adequate. Flow rate documentation was reviewed. And their chain of custody deficiencies were discussed.

A lot of "robotics" were in use in the process area. These were self-contained. Grinding ops and some chamfering is conducted prior to sintering.

They also utilize a distillation unit for capturing and re-using their solvent, acetone.

QA/QC seemed to be fairly tight as well as the facility's housekeeping. IU rep was knowledgeable, open and cooperative. City rep asked pertinent questions and brought up some good points regarding **suspended solids** (graphite in particular) and was familiar with the facility's ops.

Visit conducted by: Gilliam/Burns Date: 5/14/08



(signature of auditor conducting visit)

Attachment A-1

COPY FOR ADEC
A. GILLIN

APPLICATION FOR INDUSTRIAL USER DISCHARGE PERMIT
City of Rogers, Arkansas

Facility Name Superior Industries, Intl.'
Address 1301 N. Dixieland Road
Rogers, Ar. 72756
Authorized Official Larry Beals
Title General Manager
Phone 479/631/8037 Fax 479/636/6054
E-mail Address lbeals@supind.com

Contact Representative(s) John Fisher
Title Environmental Engineer
Phone 479/631/8037 Ext. 432
E-mail Address jfisher@supind.com

Type of Business Aluminum Wheel Manufacturer
NAIC Code(s) 3365
Permit Number 03-SII Issue Date 01/01/03 Exp. Date 12/31/05
Categorical Classification Aluminum Wheel Casting
Plans
TOMP Initial Summary Date 04/02/90
Last Revision Date 03/24/03
Slug Control Initial Summary Date 8/21/2000
Last Revision Date 03/16/04
P2 Initial Summary Date 9/03/96
Last Revision Date 12/01/03
WC/WM Initial Summary Date 12/06/96
Last Revision Date _____

Nature of Operation Casting of OEM Aluminum Wheels
Machine
Coatings of paint and clear coat

COPY

Detailed Description of Process Aluminum ingots are melted in 6,000 ton/hr. furnaces. Wheel formed
By low-pressure cast machines. Fettled and shot peened prior to machining and finish coating.

Production Data (units/day, kg/day, Mlbs./day):

Process	<u>Cast ave</u>	Production Rate	<u>7,000 wheels</u>	days/yr	<u>5 day</u>
Process	_____	Production Rate	_____	days/yr	_____
Process	_____	Production Rate	_____	days/yr	_____
Process	_____	Production Rate	_____	days/yr	_____

Number of Connections to City Sewer: Process Only 1 Sanitary Only 1 Combined 0

Regulated Monitoring Site Contains: Process Only Combined Waste streams

Regulated Discharge Continuous Batch

List Regulated Processes and Flow Rates:

<u>Metal finishing point source</u>	<u>90,000</u>	gallons/	_____
_____	_____	gallons/	_____
_____	_____	gallons/	_____
_____	_____	gallons/	_____
_____	_____	gallons/	_____
_____	_____	gallons/	_____
_____	_____	gallons/	_____
_____	_____	gallons/	_____
_____	_____	gallons/	_____

Total Regulated Process Flow 90,000 gallons/day

Combined Sanitary Flow 20,000 gallons/day

Total Regulated Flow 110,000 gallons/day

A-16

Has this facility experienced a spill or slug discharge into the sanitary sewer or storm drain? no

If so, describe the incident (when, what was spilled, amount, cause of spill/slug, actions taken)

What is the primary pollution or water quality concern at this facility? _____

High or Low pH is a concern that is monitored. Neutralization is used with the caustics and acids.

We no longer use hexavalent chromium and the destruct system is going to be removed from premises.

Due to the non-chrome chemicals we are now using the flows are higher because of increased dumping

Of rinse tanks. Also the reject water from the R/O Units is causing greater flows. We are however

Reusing some of this in other areas.

Describe the best management practices this facility uses to prevent or reduce pollution

Neutralization of spent chemical baths and of the caustic tanks.

Reclaimed wash water from pre-melt area to eliminate coolant from entering waste-water

Carbon filtration has been put in place to reduce CBOD from the use of dye-penetrant

We are installing Helium leak testers that will reduce the daily dumping/refilling of water testers

We have started using the reject water from a R-O to use in rinse booths in paint room

GE Osmonics is drafting a proposal for a waste treatment system to reclaim and reuse effluent

Is there an Environmental Management System? Yes Date last revised 2005

Describe the environmental performance goals Goals are evaluated annually

Reduce landfill by recycling plastics,paper,cardboard

Reduce utilities in general

Eliminate the use of chromium,this was complete in July 05'

A-1c

Detailed Description of Pretreatment System _____

The only pretreatment system we have is the chrome destruct system which is going to be removed

Hexavalent Chromium is no longer used in finish coating.

Neutralization is used for acids and caustics

Monitoring Equipment Information (manufacturer, model number):

Flow Meter Isco 4210 Sampler Isco 3710

Other Accumet Model 15 Ph Meter

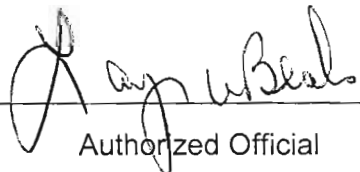
Provide: Discharge summary report. Include the analytical test results and corresponding flow readings reported over the past 12 months.

City has past and current DMR.

Provide: 8 1/2" x 11" facility plan with schematic flow diagram of process activities, wastestreams, and sewer connections.

Map will accompany signed copy

I am hereby applying for a City of Rogers Industrial User Discharge Permit to discharge waste from the above-mentioned facility to the City of Roger's wastewater treatment system. I hereby certify that the information submitted in the application is accurate to the best of my knowledge.



Authorized Official

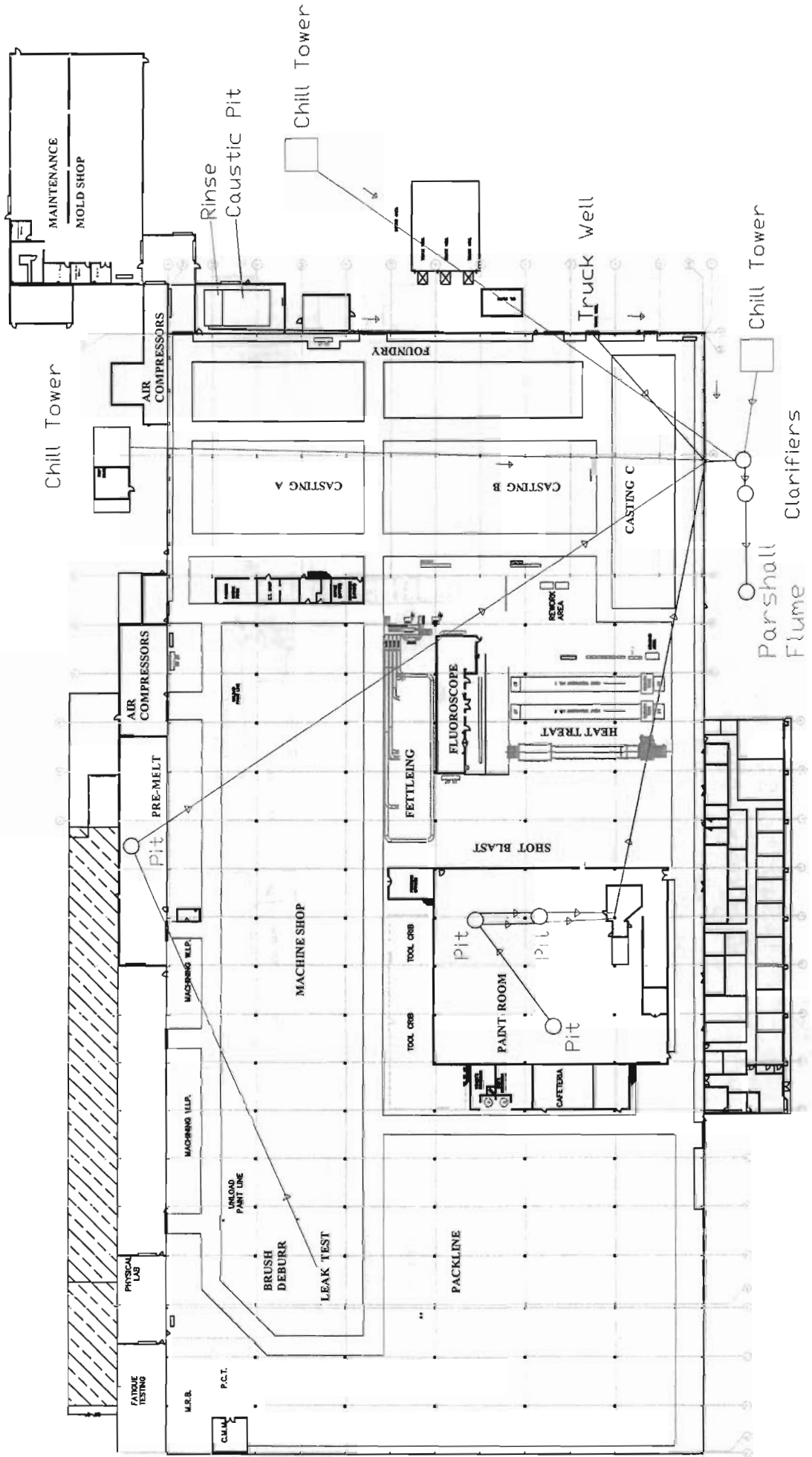
10/31/05

Date

Submit to: Control Authority
Rogers Pollution Control Facility
4300 Rainbow Road, Rogers, AR 72758-1440
Tel. 479-273-7378 Fax 479-273-7627

A-1d

Green Items Represent Clarification System for Wastewater



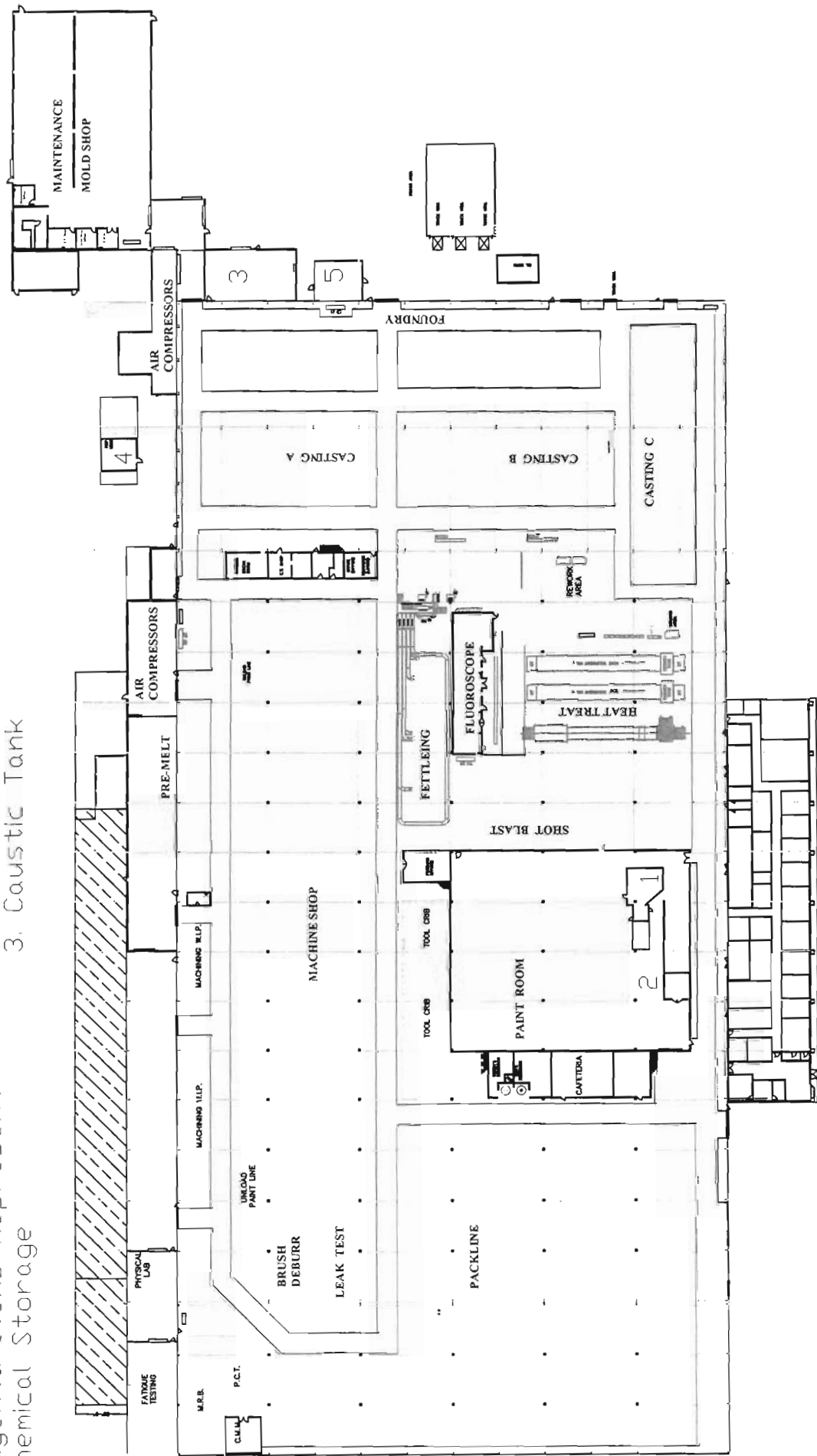
A-1e

Accidental Spill Prevention Plan

Appendix A

- 1. Caustic Storage
- 2. Hydrochloric Acid & Paint Room Chemicals
- 3. Caustic Tank
- 4. Water Treatment Chemicals
- 5. Water Treatment Chemicals

Magenta Items Represent Chemical Storage



Attachment A-2
COPY

FOR ADECR A. GILLIAM
E0075



Rogers Water Utilities

ROGERS POLLUTION CONTROL FACILITY

"SERVING ROGERS - PROTECTING THE ENVIRONMENT"

Permit No.: 07-SII

INDUSTRIAL USER DISCHARGE PERMIT

In accordance with the provisions and conditions of Ordinance No. 83-23 of the Rogers City Code, and also any applicable provisions of Federal or State laws or regulations,

SUPERIOR INDUSTRIES INTERNATIONAL, INC.
1301 North Dixieland Road
Rogers, Arkansas 72756

is hereby authorized by the City of Rogers, Arkansas, to discharge industrial wastewaters from its metal finishing operations located at the above address into the City of Rogers' wastewater treatment system in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any and or all applicable pretreatment regulations, standards, or requirements under local, state, and Federal laws, including any such regulations, standards, requirements, or laws that become effective during the term of this permit.

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

This permit shall become effective on March 1, 2007, and shall expire at midnight on December 31, 2009.

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of the Rogers City Code, a minimum of 90 days prior to the expiration date.

Signed this 13th day of February 2007:


Control Authority
S. Luanne Diffin
Environmental Services Coordinator

COPY

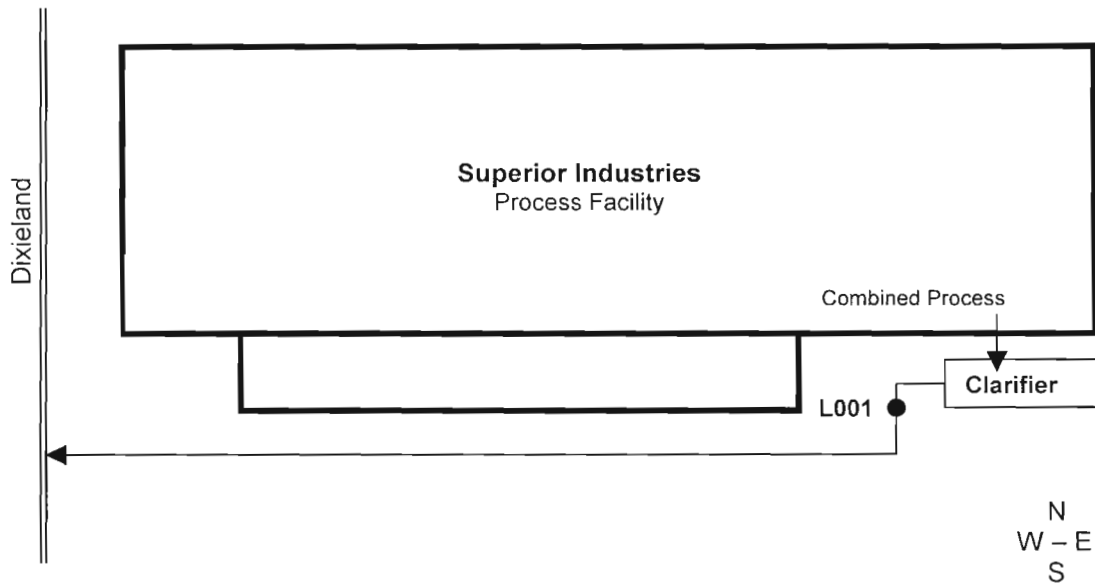
PART I PERMIT REQUIREMENTS

SECTION A. EFFLUENT LIMITATIONS

1. Description of Wastestream Locations

During the period of March 1, 2007 through December 31, 2009, the permittee is authorized to discharge process wastewater to the City of Rogers wastewater treatment system from the following location:

- (a) Location 001 Location 001 is a monitoring site flume located outside and along the south wall of the facility. The discharge shall consist of the facility combined process generated wastestreams from the metal finishing operations.



2. Effluent Limitations

- (a) Location 001 Effective March 1, 2007 and lasting through December 31, 2009, the quality of the effluent discharged from Location 001 shall not exceed the following effluent limitations. In addition, the discharge shall comply with 40 CFR Part 403 General Pretreatment Regulations, 40 CFR Part 433.17 Metal Finishing Regulations Pretreatment Standards for New Sources (PSNS), and with all applicable regulations and standards contained in the City Code. Effluent from this location shall consist of process-generated wastestreams. Any single analysis and/or measurement beyond the daily maximum and/or the monthly average pollutant limit shall be considered a violation of the conditions of this permit.

Average Daily Flow 0.067 MGD

POLLUTANT	DAILY MAXIMUM		MONTHLY AVERAGE	
	mg/L	TRC mg/L¹	mg/L²	TRC mg/L¹
Aluminum (T)	Report Only		Report Only	
Cadmium (T)	0.11	0.132	0.07	0.084
Chromium (T)	2.77	3.324	1.71	2.052
Copper (T)	3.38	4.056	2.07	2.484
Lead (T)	0.69	0.828	0.43	0.516
Nickel (T)	3.98	4.776	2.38	2.856
Silver (T)	0.43	0.516	0.24	0.288
Zinc (T)	2.61	3.132	1.48	1.776
Cyanide (T)	1.20	1.440	0.65	0.780
TTO ³	Report Only		Report Only	
Phosphorus, Total	Report Only		Report Only	
pH	Within the range of 5.0 to 11.0 at all times			

¹ Technical Review Criteria for metals means a numeric threshold of 20% above daily and/or monthly limits. The TRC limit is used to define a subcategory of SNC. A SNC violation is determined where 33 percent or more of all of the measurements taken during a six-month period equal or exceed the product of the TRC limit. (TRC = 1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH).

² The monthly average limitation means the highest allowable average daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during the month.

³ TTO shall mean total toxic organics, which is the sum of all quantifiable organic compounds specified in 40 CFR Part 433.11(e) which are greater than 0.01 mg/L.

A-2c

SECTION B. MONITORING REQUIREMENTS

1. Monitoring Requirements

- (a) Location 001 As a minimum, the following parameters shall be monitored at the frequency and with the type of measurement indicated:

<u>Parameter</u>	<u>Frequency</u>	<u>Sample Type</u>
Flow, gpd	Daily/Monthly	Indicate/Totalize
Aluminum (T)	Monthly	24-hour Composite ¹
Cadmium (T)	Monthly	24-hour Composite ¹
Chromium (T)	Monthly	24-hour Composite ¹
Copper (T)	Monthly	24-hour Composite ¹
Lead (T)	Monthly	24-hour Composite ¹
Nickel (T)	Monthly	24-hour Composite ¹
Silver (T)	Monthly	24-hour Composite ¹
Zinc (T)	Monthly	24-hour Composite ¹
Cyanide (T)	Semiannually ²	Discrete Grab ³
TTO, Total	As Necessary	24-hour Composite ¹ /Discrete Grab ³
Phosphorus, Total	Monthly	24-hour Composite ¹
pH	Monthly	pH Grab ⁴

¹ 24-hour composite sample is defined as a minimum of 12 samples collected at equal time intervals over a 24-hour period and combined proportional to flow or a sample collected at frequent intervals proportional to flow over the 24-hour period.

² Semiannually is defined as twice a year with one sample collected between January and June and the second sample collected between July and December.

³ Discrete grab sample is defined as a minimum of 4 representative samples collected equally over the monitoring period, each one individually preserved at the time of collection and composited for a single result or 1 representative sample collected and preserved where the permittee state that to the best of knowledge the individual grab sample is representative of the daily operation.

⁴ pH grab sample is defined as an individual sample collected without regard for flow and time at a representative point in the discharge stream. A pH grab sample must be analyzed within 15 minutes of sample collection

2. Additional Monitoring Requirements

The permittee shall be required by the Control Authority to perform additional monitoring as necessary to:

- (a) Verify the absence of specific pollutants,
- (b) Determine the toxicity of the discharge through biomonitoring testing, and
- (c) Identify and assess uncontrolled discharge measures and pollution prevention options.

3. TTO Monitoring Alternative

As an alternative to routine monitoring for TTO, the permittee may elect to develop a Toxic Organic Management Plan (TOMP) specifying the toxic organic compounds used, the method of disposal, and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater collection system.

A TOMP should include the following information.

- (a) A complete inventory of all toxic organic chemicals in use or identified through sampling and analysis of the wastewater from regulated process operations for all toxic organic compounds listed in 40 CFR Part 433. Organic constituents of trade-name products should be obtained from the supplier.
- (b) A pollution prevention assessment for TTOs.
- (c) A description of the methods of disposal other than discharge to wastewaters, such as reclamation, contract hauling, or incineration.
- (d) The procedures for ensuring that the regulated toxic organic pollutants do not spill or routinely leak into process wastewaters, floor drains, noncontact cooling water, groundwater, surface waters, sanitary sewers or any other location which allows the discharge of the compounds.
- (e) The identities and determinations or estimates of approximate quantities of toxic organic pollutants used in and discharged from the regulated processes. Compounds present in the wastestreams that are discharged to sanitary sewers or surface waters may be a result of regulated processes or disposal, spills, leaks, rinse water carryover, and other sources.

Upon approval by the Control Authority the permittee may demonstrate compliance with TTO requirements by certifying that the facility is adhering to the TOMP. The certification statement must be signed by a responsible corporate officer of the company or duly authorized representative. The permittee must provide the following certification statement with the initial TOMP and with each subsequent DMR:

"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the Control Authority."

The permittee elected to submit a TOMP in lieu of routine TTO monitoring. The initial TOMP was approved April 2, 1990. Since initial approval the permittee has submitted a TOMP revision on March 24, 2003 and subsequent revision letters.

To comply with the conditions of this permit the permittee must review the existing TOMP by June 1, 2007. The permittee must submit notification that the approved TOMP is accurate or submit a revised TOMP within 120 days of this permit. During the duration of this permit the permittee must review and revise the TOMP as necessary. In addition the permittee must analyze and report at least one TTO scan, as defined in 40 CFR Part 433.15 Metal Finishing Regulations, during the 3 year permit period to verify TOMP certification. The permittee need analyze for only those pollutants that would reasonably be expected to be present.

The certification eligibility may be revoked if independent sampling reveals violations or results inconsistent with the values reported by the permittee or for other cause. Furthermore, if any production process is modified, or if conditions change that affect the use and/or storage of toxic organics, the permittee shall notify the Control Authority. The Control Authority may require that additional sampling be performed.

SECTION C. MONITORING REPORT REQUIREMENTS

1. Discharge Monitoring Report

All monitoring results obtained during the calendar month shall be summarized and reported on a discharge monitoring report (DMR) provided by the Control Authority. The DMR and copy of all analytical results shall be submitted to the Control Authority on or before the 15th of the month following the monitoring period. The DMR shall indicate the nature and concentration of all pollutants in the effluent that are regulated by the limits set forth in Part I Section A.2, and include measured daily flows and total monthly flows. DMRs shall be submitted even when no discharge occurs during the monitoring period. The DMR shall contain the following:

- (a) Industry name, address and contact representative;
- (b) Monitoring period;
- (c) Daily and monthly average pollutant concentration and loading results;
- (d) Total, average and daily flow readings;
- (e) Signatory certification statement; and
- (f) Signature of authorized representative.

The DMR shall be mailed or faxed to:

Control Authority
4300 Rainbow Road
Rogers, Arkansas 72758-1440
479-273-7627 (fax)

If, during any period, the permittee fails to comply with permit requirements and limitations, the permittee shall submit to the Control Authority as part of the DMR an explanation of the noncompliance, any known or suspected cause, and actions the permittee has taken to prevent further occurrences.

SECTION D. SPECIAL CONDITIONS

1. Voluntary Phosphate Reduction

The Control Authority is requesting the permittee to voluntarily implement and maintain strategic process control initiatives that would consistently achieve daily phosphate loading levels of a recommended 3.0 lbs/day by October 1, 2006. It is recommended that the permittee design a management plan that would incorporate best management practices (BMPs) and alternative performance strategies in order to achieve the environmental goal of phosphate reduction. The plan would include specific measures to determine whether or not implementation procedures are achieving the performance goal.

If the permittee elects to establish a voluntary phosphate reduction performance goal, it is recommended that the permittee submit a summary of the management plan and subsequent data that would verify the permittee is meeting the performance goal.

SECTION E. COMPLIANCE SCHEDULE

1. Compliance Schedule Requirements

The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

- (a) Comply with the effluent limitations by March 1, 2007.

2. Compliance Schedule Reporting

No later than 14 calendar days following the date identified in the above schedule, the permittee shall submit to the Control Authority a progress report including, at a minimum, whether or not it complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with the increment of progress, the reasons for delay, and the steps being taken to return the project to the scheduled established.

PART II STANDARD CONDITIONS

SECTION A. GENERAL CONDITIONS

1. Severability

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

2. Duty to Comply

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit shall be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatement.

3. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Permit Termination

This permit may be terminated for the following reasons:

- (a) Creates a dangerous situation threatening human health, the environment or publicly owned treatment works (POTW);
- (b) Exceeds discharge limits and results in damage to the environment;
- (c) Causes the POTW to violate its NPDES permit;
- (d) Causes interference or pass through or damage to human health or the POTW;
- (e) Fails to meet effluent limitations and/or violates any term or permit conditions;
- (f) Fails to notify the Control Authority of violations or discharges that result in damage;
- (g) Fails to accurately report the discharge constituents and characteristics;
- (h) Obtains this permit by misrepresentation or failure to disclose fully all relevant facts;
- (i) Fails to report significant changes in operation or discharge volume or characteristics;
- (j) Falsifies self-monitoring reports;
- (k) Tampers with monitoring equipment;
- (l) Refuses to allow timely access to the facility premises and records;
- (m) Fails to meet compliance schedules; and
- (n) Fails to pay fines and/or sewer charges.

5. Permit Modification

This permit may be modified for good causes including, but not limited to, the following:

- (a) To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
- (b) Substantial alterations or additions to the discharger's operation processes, or discharge volume or character which were not considered in drafting the effective permit;
- (c) A change in any condition in either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- (d) Information indicating that the permitted discharge poses a threat to the Control Authority's collection and treatment systems, POTW personnel or the receiving waters;
- (e) Violation of any terms or conditions of the permit;
- (f) Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
- (g) Revision of or variance from such categorical standards pursuant to 40 CFR 403.13;
- (h) To correct typographical or other errors in the permit;
- (i) To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- (j) Upon request of the permittee, provide such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation or reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

6. Permit Appeals

The permittee may petition to appeal the terms of this permit within 30 days of the notice. This petition must be in writing; failure to submit a petition for review shall be deemed to be a waiver of the appeal. In its petition, the permittee must indicate the permit provisions objected to, the reasons for this objection, and the alternative conditions, if any, it seeks to be placed in the permit.

The effectiveness of this permit shall not be stayed pending reconsideration by the Rogers' Waterworks and Sewer Commission. If, after considering the petition and any arguments put forth by the Superintendent, the Waterworks and Sewer Commission determines that reconsideration is proper, it shall remand the permit back to the Superintendent for reissuance. Those permit provisions being reconsidered by the Superintendent shall be stayed pending reissuance.

A Waterworks and Sewer Commission's decision not to reconsider a final permit shall be considered final administrative action for purposes of judicial review. The permittee seeking judicial review of the Waterworks and Sewer Commission's final action must do so by filing a complaint with the court of appropriate jurisdiction.

A-2j

7. Limitation on Permit Transfer

Permits may be reassigned or transferred to a new owner and/or operator with prior approval of the Control Authority:

- (a) The permittee must give at least 30 days advance notice to the Control Authority.
- (b) The notice must include a written certification by the new owner which:
 - 1) States that the new owner has no immediate intent to change the facility's operations and processes;
 - 2) Identifies the specific date on which the transfer is to occur;
 - 3) Acknowledges full responsibility for complying with the existing permit.

The permittee must provide advance notice to the Control Authority of the transfer of a permitted facility.

8. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must submit an application for a new permit at least 90 days before the expiration date of this permit.

9. Continuation of Expired Permits

An expired permit will continue to be effective and enforceable until the permit is reissued if:

- (a) The permittee has submitted a complete permit application at least 90 days prior to the expiration date of the user's existing permit.
- (b) The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the permittee.

10. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any violation of Federal, State or local laws or regulations.

11. Dilution

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

12. Compliance with Applicable Pretreatment Standards and Requirements

Compliance with this permit does not relieve the permittee from its obligation regarding compliance with any and all applicable local, State and Federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this permit.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all treatment operations and systems which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. The operating staff shall be qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

2. Duty to Halt or Reduce Activity

Upon reduction of efficiency of operation, or loss or failure of all or part of the treatment system, the permittee shall, to the extent necessary to maintain compliance with this permit, control production or discharges or both until operation of the treatment is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of Treatment System

Bypass, or the intentional diversion of wastestreams from any portion of the permittee's treatment system, is prohibited, unless:

- (a) Bypass is unavoidable to prevent loss of life, personal injury, or severe property damage.
- (b) There is no feasible alternative to the bypass, such as the use of auxiliary treatment operations, retention of untreated wastes, or maintenance during normal periods of equipment downtime.
- (c) The bypass does not cause effluent limitations to be exceeded, but only if it is also for essential maintenance to assure efficient operation.
- (d) The permittee submits one of the required bypass notices:
 - (1) Anticipated Notice. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten days before the date of the bypass, to the Control Authority. The Control Authority may approve an anticipated bypass, after considering the adverse effects, if the Control Authority determines that the permittee will meet the three conditions listed in Section B.3. (a), (b) or (c).

- (2) Unanticipated Notice. A permittee shall submit oral notice of an unanticipated bypass that exceeds applicable pretreatment standards to the Control Authority within 24 hours from the time the permittee becomes aware of the bypass. A written submission shall also be submitted within 5 days of the time the permittee becomes aware of the bypass. The Control Authority may waive the written notice on a case-by-case basis if the oral notice has been received within 24 hours.

All notices, whether for anticipated or unanticipated bypasses, shall contain:

- (a) A description of the bypass and its cause;
- (b) The duration of the bypass, including exact dates and times;
- (c) If the bypass has not been corrected, the anticipated time it is expected to continue;
- (d) Steps taken or planned to reduce, eliminate and prevent reoccurrences of the bypass.

4. **Removed Substances**

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with Section 405 of the Clean Water Act, Subtitles C and D of the Resource Conservation and Recovery Act (RCRA), and any applicable state and local regulation.

5. **Power Failure**

The permittee is responsible for maintaining adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failure either by means of alternate power sources, standby generators, or retention of inadequately treated effluent.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge during the entire monitoring period. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestream, body of water, or substance. Monitoring points shall not be changed without notification to and the approval of the Control Authority. The permittee shall ensure that all equipment used for sampling and analysis is routinely calibrated, inspected and maintained to ensure accuracy of measurement.

2. Flow Measurements

Appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitoring discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of the device. Devices shall be capable of measuring flows with a maximum deviation of less than $\pm 10\%$ from true discharge rates throughout the range of expected discharge volumes. The discharge flow measurement device that activates the autosampler shall be installed at the monitoring point of discharge and must be calibrated by a certified technician at least yearly. In-house calibration must be performed on both devices at a frequency to verify accuracy and reliability of measurements. The permittee is responsible for ensuring that each daily flow measurement is representative of the discharge during that period. Comparison of flow measurements from each device is required to ensure accuracy and reliability of discharge measurements. All flow readings and calibration records must be maintained for a minimum of 3 years.

3. Monitoring and Analysis Procedures

All monitoring and analysis required by this permit shall be performed in accordance with the techniques and test procedures prescribed in 40 CFR Part 136 and amendments thereto, otherwise approved by EPA. An adequate analytical quality control program, including the analysis of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory. Where analytically applicable, spikes and duplicate samples are to be analyzed on at least 10% of the samples. Except for pH, all analysis shall be performed by a laboratory that is currently certified by the State of Arkansas for the regulated parameter. The permittee may analyze and report pH readings in-house provided the test procedures prescribed in 40 CFR 136 are followed and a record of all calibrations and analysis are maintained for a minimum of 3 years.

4. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or amendments thereto, all monitoring results for regulated parameters reported at the point of compliance shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and the results shall be reported in the DMR.

5. Sample Collection

Samples for oil and grease, temperature, pH, cyanide, phenols, and volatile organic chemicals must be obtained using grab collection techniques. The permittee must collect all other wastewater samples using flow proportional composite collection techniques. In the event flow proportional sampling is not feasible, the Control Authority may authorize the use of time proportional sampling or through a minimum of four grab samples where the permittee demonstrates that this will provide a representative sample of the effluent being discharged.

6. Sampling and Analysis Record Contents

Records of sampling and analyses shall include:

- (a) The date, exact place, time, and methods of sampling or measurements and sample preservation techniques or procedures;
- (b) The individual(s) who performed the sampling or measurement;
- (c) The date(s) analyses were performed;
- (d) The individual(s) who performed the analyses;
- (e) The analytical techniques or methods used; and
- (f) The results of all required analyses.

7. Retention of Records

- (a) The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report, or application. This period shall be extended by request of the Control Authority at any time. The permittee shall make such records available for inspection and copying by the Control Authority.
- (b) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Control Authority shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

8. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, is a crime and may result in the imposition of criminal sanctions and/or civil penalties.

9. Inspection and Entry

The permittee shall allow the Control Authority and/or their authorized representatives, to:

- (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, monitoring equipment, control equipment, practices, or operations regulated or required under this permit;
- (d) Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and
- (e) Inspect any production, manufacturing, fabrication, or storage area where pollutants, regulated under the permit, could originate.

The permittee shall not knowingly cause an unreasonable delay in allowing the Control Authority or their authorized representative access to the industrial user's premises. The permittee shall make necessary arrangements so that upon presentation of suitable identification the Control Authority will be permitted entry without delay.

If the Control Authority is refused access to a building, structure or property, and if the Control Authority has demonstrated probable cause to believe that there may be a violation of this permit or that there is a need to inspect to verify compliance with this permit, or to protect the overall public health, safety and welfare of the community, then the Control Authority may seek issuance of a search warrant from a court with appropriate jurisdiction. In the event of an extreme emergency affecting public health and safety, inspections shall be made without the issuance of a warrant.

The permittee must take precautions to ensure the safety of Control Authority personnel while on the permittees' premises. Any temporary or permanent obstruction to safe and easy access to the industrial facility shall be promptly removed by the industrial user at the written or verbal request of the Control Authority. The costs of clearing such access shall be borne by the industrial user.

SECTION D. ADDITIONAL REPORTING REQUIREMENTS

1. Planned Changes

The permittee shall promptly notify the Control Authority of any facility expansion, production increase, or process modifications that will result in a new or substantial change in the volume, pollutant(s) or nature of the discharge, including the listed or characteristic hazardous wastes for which the permittee has submitted initial notification under 40 CFR 403.12(p). The Control Authority shall be notified within 5 working days after the permittee is aware of the change.

2. Anticipated Noncompliance

The permittee shall give advance notice to the Control Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

3. Accidental Discharge Report

The permittee shall notify the Control Authority immediately upon the occurrence of an accidental discharge of substances prohibited by the city ordinance or any uncontrolled releases or spills that may enter the wastewater collection system. The Control Authority should be notified at any time by telephone at 479-273-7378. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental release in accordance with this section does not relieve the permittee of other reporting requirements that arise under local, state or federal law.

Within 5 days following an accidental discharge, the permittee shall submit to the Control Authority a detailed written report. The report shall specify:

- (a) Description of cause of the upset, uncontrolled discharge or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration and volume of waste.
- (b) Duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.
- (c) All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, uncontrolled discharge, accidental discharge, or conditions of noncompliance.

4. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or with the City Ordinance shall inform the Control Authority within 24 hours of becoming aware of the upset at 479-273-7378.

A written follow-up report of the upset shall be filed by the permittee with the Control Authority within 5 days. The report shall specify:

- (a) Description of the upset, the cause(s) thereof and the upset's impact on the permittee's compliance status;
- (b) Duration of noncompliance, including exact dates and times of noncompliance, and if not corrected, the anticipated time the noncompliance is expected to continue; and
- (c) All steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset.

The report must also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner. A documented and verified operating upset shall be an affirmative defense to any enforcement actions brought against the permittee for violations attributable to the upset event.

5. Noncompliance Notification

If the results of the permittee's wastewater analysis indicate that a violation of this permit has occurred, the permittee must:

- (a) Notify the Control Authority of the violation within 24 hours of becoming aware of the violation;
- (b) Submit to the Control Authority as part of the DMR an explanation of the noncompliance, any known or suspected cause, and actions the permittee has taken to prevent further occurrences; and
- (c) Repeat the sampling and pollutant analysis and submit, in writing, the results of this repeat analysis within 30 days after becoming aware of the violation.

6. Duty to Provide Information

The permittee shall furnish to the Control Authority within 15 days any information which the Control Authority requests to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also, upon request, furnish to the Control Authority within 30 days copies of all records required by this permit. Information shall be submitted in the form, manner and time frame requested by the Control Authority.

7. Availability of Data and Confidential Information

All information and data obtained from reports, questionnaire, permit application, permits and monitoring programs and from inspection shall be available to the public or any governmental agency without restriction unless the user specifically requests and is able to demonstrate to the satisfaction of the Control Authority that the release of such information would divulge information, processes, or methods of production entitled to protection as trade secrets of the permittee. Information claimed as confidential must be submitted with the words "confidential business information" stamped on each page. If no claim is made at the time of submission the Control Authority may make the information available to the public without further notice. All effluent data shall be available to the public without restriction.

8. Compliance Schedule

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 15 days following each schedule date. Any reports of noncompliance shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

9. Changes in Discharge of Toxic Substances

The permittee shall notify the Control Authority as soon as the permittee knows or has reason to believe:

- (a) That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the "notification levels" described in 40 CFR 122.42 (a)(1).
- (b) That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant that is not limited in the permit, if that discharge will exceed the highest of the "notification levels" described in 40 CFR 122.42 (a)(2).

10. Signatory Requirements

All applications, reports, or information submitted to the Control Authority must contain the following certification statement and be signed as required in Sections (a), (b), (c), or (d) below:

"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 fines and imprisonment for knowing violations."

- (a) By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer is:
 - (1) A president, secretary, treasurer, or vice-president of the corporation in charge of a principle business function, or any other person who performs similar policy - or decision-making functions for the corporation, or:
 - (2) The manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (b) By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.
- (c) By a duly authorized representative of the individual designated in the paragraph (a) or (b) of this section if:
 - (1) The authorization is made in writing by the individual described in paragraph (a) or (b);
 - (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, superintendent, or position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
 - (3) the written authorization is submitted to the Control Authority.

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

SECTION E. ENFORCEMENT ACTIONS

1. Penalties for Violations of Permit Conditions

City Ordinance 91-40 provides that any person, operator, or owner who violates any provision of this permit or who fails to comply with any provision hereby shall be subject to a penalty of not more than \$1000.00 or imprisonment of not more than 30 days, or both, for each offense. Each violation and each day on which any such violation continues shall constitute a separate offense. Any person, operator or owner who repeatedly violates any provision of this permit shall, upon conviction, be guilty of a misdemeanor. The permittee may also be subject to sanctions under State and/or Federal law.

2. Penalties for Falsification of Reports

Any person who knowingly makes a false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance, shall be punished by a fine of not less than \$100.00 nor more than \$1000.00 for each offense.

3. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance.

4. Vandalism

No person shall maliciously, willfully, or negligently break, damage, destroy, uncover, deface, tamper with, or prevent access to any structure, appurtenance or equipment, or other part of the Control Authority's property (i.e., automatic samplers and other field equipment). Any person found in violation of this requirement shall be subject to the sanctions set out in the City Ordinance.

5. Recovery of Costs Incurred

In addition to civil and criminal liability, the permittee violating any of the provisions of this permit or Ordinance No. 83-23 or causing the damage to or otherwise inhibiting the Rogers' wastewater disposal system shall be liable to the Control Authority for any expense, loss, or damage caused by such violation or discharge. The Control Authority shall bill the permittee for the costs incurred by the Control Authority for any cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation.

6. Annual Publication

A list of all industries that were subject to enforcement proceedings during the 12 previous months shall be annually published by the Control Authority in any paper of general circulation within the jurisdiction served by the POTW. Accordingly, the permittee is apprised that noncompliance with this permit may lead to an enforcement action and may result in publication of its name in an appropriate newspaper in accordance with this section.

Each industrial user identified as a significant noncompliant industry for the pretreatment calendar year shall at their expense place a minimum quarter page advertisement in the largest daily newspaper within its service area. The ad shall list the company name, address, and an explanation of each violation, frequency of violation, and actions taken to remedy further violations, and current compliance status.

7. Excess Loading Surcharge

The permittee is subject to a surcharge, in addition to the regular sewage service charge, for all discharges having a carbonaceous biochemical oxygen demand (CBOD₅) and/or total suspended solids (TSS) concentration greater than 300 mg/L. The calculated surcharge will be determined using a single sample result or the arithmetical average of individual values for the specific sampling period. The flow rate for calculating the surcharge will be the average daily flow during the specific sampling period. The sampling period is defined as beginning the day after the last reported sample result was below 300 mg/L and ending the day before the reported sample result was again below 300 mg/L. The surcharge of each constituent will then be determined by multiplying the excess pounds of each constituent by the appropriate rate of surcharge.

8. Significant Noncompliance Criteria

An industrial user is in SNC if its violation meets one or more of the following criteria:

- (1) Chronic violations of wastewater discharge limits, defined here as those in which 66% or more of wastewater measurements taken during a 6 month period exceed, by any magnitude, a numerical a Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(1);
- (2) Technical Review Criteria (TRC) violations, defined here as those in which 33% or more of wastewater measurements taken for each pollutant parameter during a 6 month period equals or exceeds the product of the numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(1), multiplied by the applicable criteria; 1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other pollutants except pH.

- (3) Any other violation of a Pretreatment Standard or Regulation, as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative standard) that the POTW determines has caused, alone or in combination with other discharges, interference or pass through, including endangering the health of POTW personnel or the general public;
- (4) Any discharge of pollutants that has caused imminent endangerment to human health, welfare or the environment, or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge;
- (5) Failure to meet, within 90 days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance;
- (6) Failure to provide within 45 days after the due date, any required reports, including baseline monitoring reports, reports on compliance with categorical pretreatment standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- (7) Failure to accurately report noncompliance; or
- (8) Any violation, including a violation of best management practices, which the POTW determines will adversely affect the operation or implementation of the pretreatment program

9. Emergency Suspensions

The Control Authority may immediately suspend the permittee's discharge after notice to the permittee, whenever such suspension is necessary to stop an actual or threatened discharge that reasonably appears to present or cause an imminent or substantial endangerment to the health or welfare of persons, environment, or the POTW.

Upon notification of a suspension of its discharge the permittee shall immediately stop or eliminate its contribution. If the permittee fails to immediately comply voluntarily with the suspension order, the Control Authority may take steps, including immediate severance of the sewer connection, to prevent or minimize damage to the POTW, its receiving stream, or endangerment to any individuals. The Control Authority may allow the permittee to recommence its discharge when the user has demonstrated to the satisfaction of the Control Authority that the period of endangerment has passed, unless termination proceedings are initiated against the permittee.

A permittee responsible for any discharge presenting imminent endangerment shall submit a detailed written statement, describing the cause(s) of the harmful contribution and the measure(s) taken to prevent any future occurrence, to the Control Authority within 5 days of the occurrence.

Part III PROHIBITIVE DISCHARGE STANDARDS

1. General Prohibitions

The permittee shall not introduce or cause to be introduced into the POTW any pollutant(s) or wastewater(s) that causes pass through or interference.

2. Specific Prohibitions

The permittee shall not introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:

- (a) Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140° F (60° C) using the test methods specified in 40 CFR 261.21;
- (b) Pollutants that will cause corrosive structural damage to the POTW or equipment, but in no case discharges with pH lower than 5.0;
- (c) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in interference;
- (d) Any pollutant, including oxygen demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW;
- (e) Wastewater having a temperature greater than 104° F (40° C), or which will inhibit biological activity in the POTW resulting in interference;
- (f) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;
- (g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- (h) Any trucked or hauled pollutants, except at discharge points designed by the POTW.

PART IV OTHER REQUIREMENTS

1. Pollution Prevention Program

The permittee is required to develop an on-going comprehensive pollution prevention program what will utilize materials, processes and/or practices to reduce or eliminate pollutants or waste at the source. The pollution prevention program must incorporate source reduction, energy efficiency, reuse of input materials during production, and reduced water consumption.

The pollution prevention program must include practices which reduce the amount of any hazardous substance, pollutant, or contaminant entering the wastestream or otherwise released to the environment prior to recycling, treatment, or disposal and reduce the hazards to public health and the environment associated with the release of such pollutants.

The pollution prevention program should include such techniques as toxics use reduction, raw material substitution, process and/or production modification, equipment and/or technology modification, reformulation and/or product redesign, and training. Additional techniques include better management practices and improved inventory control, maintenance, housekeeping, operating, production planning and sequencing procedures.

The permittee is required to develop the management strategies needed to incorporate waste minimization, source reduction, water conservation, and best management practices into the company policies and structures. The management strategies must also contain methods for establishing an on-going company-wide pollution prevention program, conducting assessment, and implementing options.

The Pollution Prevention Plan must address the following:

- (a) A policy statement of management's commitment to pollution prevention;
- (b) Specific goals of the plan, including numeric performance goals;
- (c) Technically and economically practical pollution prevention options and a schedule for their implementation;
- (d) An accounting of hazardous waste management costs;
- (e) A description of pollution prevention training programs for employees;
- (f) A rationale for stated performance goals;
- (g) A process-flow diagram showing where constituents enter and exit manufacturing process;
- (h) An estimate of the amount of regulated waste generated by each process;
- (i) An assessment of current and past pollution prevention activities, including an estimate of the reduction in amount of toxicity of regulated waste achieved by the identified actions;
- (j) A review of pollution prevention opportunities applicable to the facility's operations;
- (k) Identification of technically and economically feasible pollution prevention opportunities, including an assessment of the cost, benefits, and cross-media impacts of the identified opportunities; and
- (l) An implementation timetable.

Failure of the pollution prevention program to prevent violations of any other provisions of the permit in no way relieves the permittee from its legal liability for noncompliance with the permit conditions.

The permittee must submit a summary of the pollution prevention program plan by April 2007, and subsequent information by April of each year that would verify the on-going pollution prevention performance goals are being met. Once the pollution prevention program goals have been met, the permittee is encouraged to seek continuous environmental improvements even beyond these reductions.

2. Slug Control Plan (SCP)

The permittee shall develop a Slug Control Plan (SCP) with policies and procedures to prevent or mitigate the effects of slug discharges to the POTW. The function of the SCP is to ensure that the permittee has a planning and implementation tool to minimize potential spills and/or slugs and to prevent interference at a POTW due to non-routine or accidental discharges. The SCP may include constructing physical containment facilities as well as implementing sound management practices to prevent slug discharges.

A Slug Discharge is defined as any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or non-customary batch discharge, which has a reasonable potential to cause interference or pass through, or in any other way violate the POTW's regulations, local limits or permit conditions (40 CFR 403.8(f)(2)(vi)).

All slug discharges and any facility changes affecting the potential for a slug discharge must be reported to the Control Authority immediately upon knowledge of the discharge.

Failure of the Slug Control Plan to prevent violations of any other provisions of the permit in no way relieves the permittee from its legal liability for noncompliance with the permit conditions.

The Slug Control Plan must address the following:

- (a) General Information: permittee name and address, permittee contact, and security provisions;
- (b) Discharge Practices: description of discharge practices, including non-routine batch discharges;
- (c) Facility Layout Flow Diagrams: general layout including mapping of manufacturing, storage, transportation, and disposal areas;
- (d) Material Inventory: description of stored chemicals (types, volumes, container);
- (e) Spill and Leak Prevention Equipment and Operations and Maintenance Procedures: definition of available equipment and plans to obtain equipment;
- (f) Emergency Response Equipment and Procedures: inventory and location of equipment and procedures;

- (g) Slug Reporting: procedures for immediately notifying the POTW of slug discharges, including any discharge that would violate a prohibition under 40 CFR 403.5(b), with procedures for follow-up written notification within 5 days;
- (h) Training Program: assurances that the Slug Control Plan is implemented by trained employees; and
- (i) Prevention Procedures: a variety of procedures to prevent adverse impact from any accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents.

Once the Slug Control Plan is approved, the permittee shall assess the current SCP and if necessary submit to the Control Authority a revised SCP for review and approval at least by April 1st of each year.

Attachment A-3

Copy for ADEC A. Gilliam

**FACT SHEET FOR INDUSTRIAL USER
DISCHARGE PERMIT 07-SII
Superior Industries International, Inc.**

COPY

The Control Authority for the City of Rogers has made a decision to reissue an industrial user discharge permit, effective **March 1, 2007**, to **Superior Industries International, Inc.** for continuation of the discharge from its production activities to the City of Rogers sanitary sewer system. The decision to reissue a discharge permit is based on the determination that the discharge would not interfere with the treatment process or otherwise be incompatible with the sewage works or result in pass-through of pollutants such that Rogers' National Pollutant Discharge Elimination System (NPDES) permit would be violated. The purpose of this fact sheet is to present the facts and reasoning on the basis of which the decision was made.

1. INDUSTRY INFORMATION

Facility Name:	Superior Industries International, Inc.	
Facility Address:	1301 North Dixieland Road Rogers, AR 72756	
Authorized Contact:	Larry Beals General Manager Phone: (479) 631-8037 Fax: (479) 636-6054 Email: lbeals@supind.com	
Facility Contact:	Nick Martini EHS Coordinator Phone: (479) 631-8037 x 474 Fax: (479) 636-6054 Email: nmartini@supind.com	Bob Laird Environmental Technician (479) 631-8037 x432 (479) 636-6054 blaird@supind.com
Facility Activity:	Aluminum Wheel Manufacturer	
Discharge Location:	Location 001 - process only Latitude: 36° 20' 48.94" N Longitude: 94° 08' 27.86" W	
Summary:	NAIC / SIC	336399 / 3714 Other Motor Vehicle Parts Manufacturing Produce aluminum wheels for auto industry Metal Finishing (not aluminum die casting) Yes – Categorical, flow >25,000 gpd 06-SII Effective: 1/1/06
	Process Operation:	07-SII Effective: 3/1/07 Expiration Date: 12/31/2009
	Categorical Classification:	
	Significant Industrial User:	
	Previous Permit:	
	Permit:	
	CWF Applied?:	No
	TOMP:	Initial: 4/2/90 Last Revision: 3/24/03
	Slug Control Plan:	Initial: 4/2/90 Last Revision: 3/24/06 Last Reviewed: 3/24/06
	Pollution Prevention (P ²) Plan:	Initial: 7/96 Last Revision: 3/27/06 Last Reviewed: 3/27/06

COPY

General Description of the Organization

Superior Industries International a leading maker of cast and forged aluminum wheels for passenger cars and light trucks. Superior Industries sells its wheels to such major OEMs as General Motors, Ford, and DaimlerChrysler, as well as to Audi, BMW, Isuzu, and Toyota. Combined, shipments to GM, DaimlerChrysler, and Ford account for more than 85% of Superior Industries' sales.

Summary of Compliance with Previous Permit

During the history of the previous permit, Superior experience no non-compliant issues.

Connection to Sewer System

Superior Industries has a single combined wastestream discharge line connected to the city collection system west of the property at an inaccessible connection on Dixieland Road between MH 4-79 and MH 4-78.

Description of Operation

Aluminum ingots are melted and cast in low-pressure permanent casting unit to form wheel castings for the automotive industry. After casting the wheels are fettled where the center hole is cut out, shot peened, heat treated, washed, chromated, painted and machined prior to shipping to the customer.

Raw Materials

Aluminum and additive alloys. Also powder paint, liquid and clear-coat paints, water based paints.

Chemical Used

Machining fluid, flux, acids, caustic, lab titration supplies, pre-treatment chemicals, primers, paints, clear-coat

Process Discharge Outfall

The process flow consists of wastestreams from the pre-melt pit, leak test area, rinse and caustic pit, chiller tower, truck dock well and paint room washer area. All process water flows to 2 clarifiers located outside and south of the main casting operation. From the clarifier the process wastestream flows to the monitoring discharge site Location 001 (Latitude: 36° 20' 48.94" N Longitude: 94° 08' 27.86" W). Superior discharges approximately 56,000 gallons of process water 5-6 days a week at this regulated location. Superior is considered a continuous discharger.

The wastestream flows west from L001 to the west property line and combines with the city sanitary sewer. A schematic of the discharge lines is included as Attachment 1.

Production Data

Superior produces 33 Mlbs per day, 230 days per year; pours approximately 64Mlbs/day and produces approximately 1,3 M finish wheels/year or 7,000 wheels/day

Pretreatment System

Superior Industries does not have a pretreatment operation following production. Ever since Superior stopped using the chromium and needed the chromium destruct system, Superior has not needed to add additional pretreatment processes in order to meet permit.

There are 4 main process areas that discharge wastewater; Paint Room, VDH (helium leak test water) drains to Pre-melt, Chiller Tower water and truck well water. A diagram of the water sources is below. Water is discharged from these operations continuously. All wastestreams run into the 2 stage underground clarifier for further settling. The clarifier receives wastewater and allows additional settling. The effluent from the clarifier then goes through the monitoring site before entering the sanitary system.

Flow Information

Primary Measuring Device:	ISCO flow meter (Model 4210) Automatic sampler (Model 2910)
Average Daily Regulate Flow:	56,000 gpd

A-3b

Daily Maximum and Monthly Average Discharges

Superior Industries submits monthly analytical data. The following is a summary of the end-of-process average daily concentration and loading readings. The data was compiled over the past 12 months (February 2006 – January 2007) using Superior's monthly analytical monitoring data and the Control Authority's semiannual monitoring data. A copy of Superior's self-monitoring and compliance monitoring data is included as Attachment 2.

Average daily flow	0.056298 MGD	
	<u>Average Concentration</u>	<u>Average Loading</u>
Cadmium	0.0015 mg/L	0.0008 lbs./day
Chromium	0.0127 mg/L	0.0077 lbs./day
Copper	0.0167 mg/L	0.0099 lbs./day
Lead	0.0038 mg/L	0.0022 lbs./day
Nickel	0.0186 mg/L	0.0099 lbs./day
Silver	0.0018 mg/L	0.0010 lbs./day
Zinc	0.0564 mg/L	0.0334 lbs./day
Cyanide	0.0133 mg/L	0.0058 lbs./day
pH	Within the range of 6.68 – 7.88	

2. BASIS FOR PERMIT LIMITS

Permit Application

The Control Authority issued new permits to all permittee due to phosphorus and monitoring changes. Superior's previous permit had not expired; therefore Superior was not required to submit a permit application.

Analytical Data Summary

A summary of Superior's self-monitoring and compliance monitoring data is listed above – Daily Maximum and Monthly Average Discharges as Attachment 2.

Federal, State, and Local Regulations

Superior is regulated under the federal metal finishing regulations 40 CFR 433.17 – Pretreatment standards for new sources (PSNS). A copy of the regulations used to determine Superior's permit limits is included as Attachment 3.

It is the opinion of this Control Authority that the 5,000 gallon cooling tank following the casting operation is not considered a quench tank by definition under Metal Molding and Casting 40 CFR 464.16 Subpart A - Aluminum Casting. See ADEQ 2004 Pretreatment Audit for comments and responses. Superior is also not covered under Aluminum Forming 40 CFR 467. A copy of all correspondence and regulations related to this decision are included as Attachment 4.

Facility Plans and Flow Diagrams

Any pertinent facility plans and flow diagrams are included as Attachment 1. Discharge Permit limits will be established at Location 001 or end-of-process.

Rational for Effluent Limitations

Superior is a regulated categorical industrial user due to the metal finishing (40 CFR 433.17) operations. Superiors' permit limits are based on pretreatment standards for new sources (PSNS) with no dilution and no production calculation.

Monitoring requirements for Phosphorus and Aluminum monitoring are included to determine an effluent baseline. No limits were given at this time.

3. FINAL EFFLUENT LIMITATIONS

Effective January 1, 2007, and lasting through December 31, 2009, the quality of the effluent discharged from Superior's Location 001 shall not exceed the following effluent limitations. In addition, the discharge shall comply with 40 CFR 403 General Pretreatment Regulations, 40 CFR Part 433.17 Metal Finishing Regulations Pretreatment Standards for New Sources (PSNS), and with all applicable regulations and standards contained in the City Code. Effluent from this location consists of process generated wastestreams.

Average Daily Flow **0.067 mgd**

Pollutant	Daily Maximum		Monthly Average	
	mg/L	TRC¹	mg/L²	TRC¹
Phosphorus (T)	Report Only		Report Only	
Aluminum (T)	Report Only		Report Only	
Cadmium (T)	0.11	0.132	0.07	0.084
Chromium (T)	2.77	3.324	1.71	2.052
Copper (T)	3.38	4.056	2.07	2.484
Lead (T)	0.69	0.828	0.43	0.516
Nickel (T)	3.98	4.776	2.38	2.856
Silver (T)	0.43	0.516	0.24	0.288
Zinc (T)	2.61	3.132	1.48	1.776
Cyanide (T)	1.20	1.440	0.65	0.780
TTO ³	Report Only		Report Only	
pH	Within the range of 5.0 and 11.0 at all times			

- ¹ Technical Review Criteria for metals means a numeric threshold of 20% above daily and/or monthly limits. The TRC limit is used to define a subcategory of SNC. A SNC violation is determined where 33 percent or more of all of the measurements taken during a six-month period equal or exceed the product of the TRC limit. (TRC = 1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH).
- ² The monthly average limitations means the highest allowable average daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during the month.
- ³ TTO shall mean total toxic organics, which is the sum of all quantifiable organic compounds specified in 40 CFR Part 433.11(e) which are greater than 0.01 mg/L.

4. MONITORING REQUIREMENT

As a minimum, the following parameters shall be monitored at the frequency and with the type of measurement indicated:

<u>Pollutant</u>	<u>Frequency</u>	<u>Sample Type</u>
Flow, gpd	Daily/Monthly	Indicate/Totalize
Phosphorus (T)	Monthly	24-Hour Composite ¹
Aluminum (T)	Monthly	24-Hour Composite ¹
Cadmium (T)	Monthly	24-Hour Composite ¹
Chromium (T)	Monthly	24-Hour Composite ¹
Copper (T)	Monthly	24-Hour Composite ¹
Lead (T)	Monthly	24-Hour Composite ¹
Nickel (T)	Monthly	24-Hour Composite ¹
Silver (T)	Quarterly	24-Hour Composite ¹
Zinc (T)	Monthly	24-Hour Composite ¹
Cyanide (T)	Semiannually ²	Discrete Grab ³
TTO, Total	As Necessary	24-Hour Composite ³ /Discrete Grab ³
pH	Weekly	pH Grab ⁴

- ¹ 24-hour composite sample is defined as a minimum of 12 samples collected at equal time intervals over a 24-hour period and combined proportional to flow or a sample collected at frequent intervals proportional to flow over the 24-hour period.
- ² Semiannually is defined as twice a year with one sample collected between January and June and the second sample collected between July and December.
- ³ Discrete grab sample is defined as a minimum of 4 representative samples collected equally over the monitoring period, each one individually preserved at the time of collection and composited for a single result or 1 representative sample collected and preserved where the permittee state that to the best of knowledge the individual grab sample is representative of the daily operation.
- ⁴ pH grab sample is defined as an individual sample collected without regard for flow and time at a representative point in the discharge stream. A pH grab sample must be analyzed within 15 minutes of sample collection

Monitoring is required at a monitoring flume located south of the facility, Location 001, between the parking lot and the building. The discharge shall consist of the facility process generated wastestream from the metal finishing operation.

5. REPORTING REQUIREMENT

Superior is required to submit a monthly discharge monitoring report. The report shall indicate the nature and concentration of all pollutants in the effluent, which are regulated by the limits, set forth in Part I, Section A, and include measured maximum and average daily flows. If the production data and/or flow vary more than 15% from that used in calculation of effluent standards, the Control Authority will determine if permit limits will be modified.

6. OTHER REQUIREMENTS

Superior is required to provide a flow-metering device at the monitoring site. Superior is required to maintain and calibrate the flow metering device according to manufacturer's recommendations and maintain certification records of the calibration.

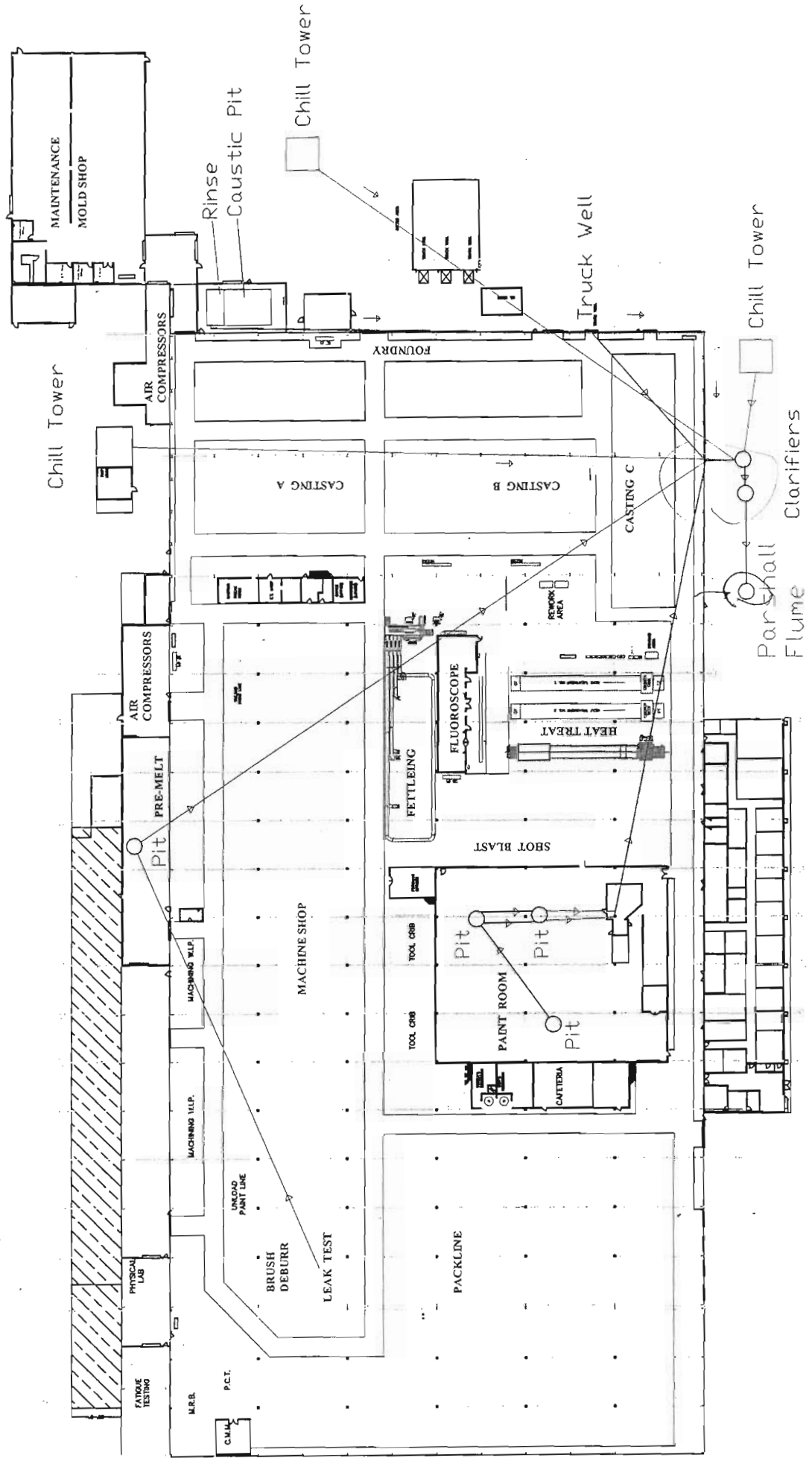
Because Superior stores chemicals onsite, Superior was required to develop a Slug Control Plan (SCP). The plan has been approved by the Control Authority and implemented according to the compliance schedule contained in the permit 07-SII. Superior shall assess the current SCP and if necessary submit to the Control Authority a revised SCP for review and approval at least by April 1st of each year. The SCP is designed to minimize any potential for spills and/or slug discharges to the waste treatment system. However, approval of this plan by the control authority does not relieve Superior from its requirements to meet all applicable Local, State, and Federal laws and regulations.

Superior has developed an on-going comprehensive Pollution Prevention Plan designed to minimize the occurrences of interferences and pass-through by utilizing source reduction and in-process recycling measures.

Superior utilizes best management practices to plan, develop, and implement a facility-wide water conservation and waste minimization program to address water reuse, recycling, and reduction options.

4800 gallons
industrial

Green Items Represent Clarification System for Wastewater

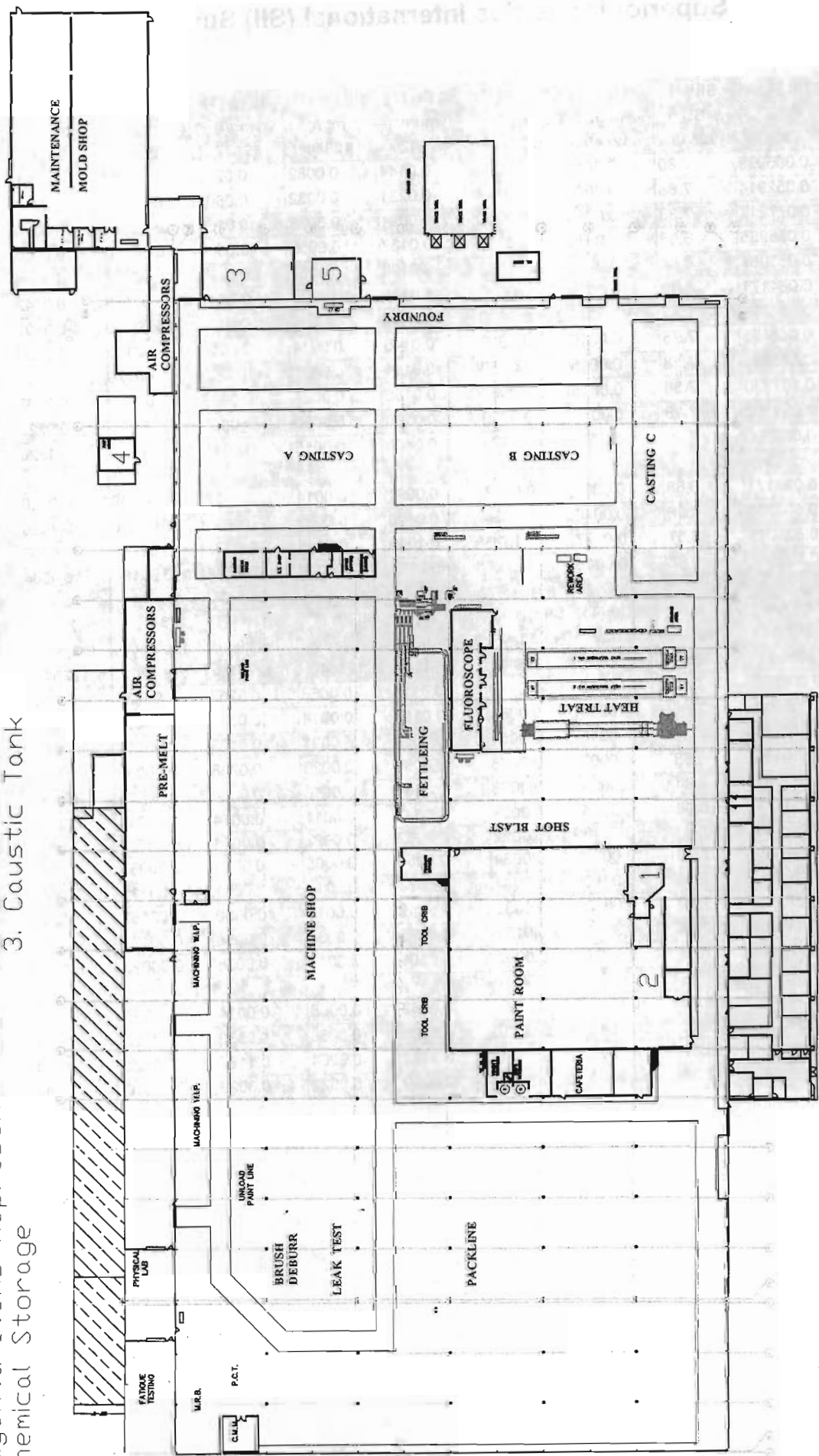


Accidental Spill Prevention Plan

Appendix A

- 1. Caustic Storage
- 2. Hydrochloric Acid & Paint Room Chemicals
- 3. Caustic Tank

- 4. Water Treatment Chemicals
- 5. Water Treatment Chemicals



Superior Industries International (SII) Summary Report - Metals

Month	SII Flow	SII pH	SII Cd (T)	SII Cr (T)	SII Cu (T)	SII Pb (T)	SII Ni (T)	SII Ag (T)	SII Zn (T)	SII CN (T)	SII TTO
	MGD 12601	SU 12619	mg/l 12640	mg/l 12641	mg/l 12642	mg/l 12644	mg/l 12647	mg/l 12649	mg/l 12651	mg/l 12643	mg/l 12676
Feb 2006	0.096939	7.80	0.0015	0.0334	0.0144	0.0082	0.0256	0.00170	0.0669		
Mar 2006	0.052914	7.88	0.0009	0.0144	0.0231	0.0032	0.0801	0.00135	0.0455	0.0100	
Apr 2006	0.077217	7.33	0.0015	0.0080	0.0091	0.0033	0.0160	0.00170	0.0300		
May 2006	0.056955	6.68	0.0010	0.0143	0.0137	0.0056	0.0500	0.00170	0.0300		
Jun 2006	0.052987	6.84	0.0010	0.0166	0.0190	0.0037	0.0123	0.00170	0.0848		
Jul 2006	0.034171	6.98	0.0015	0.0090	0.0146	0.0039	0.0047	0.00170	0.0742	0.0200	
Aug 2006	0.053136	7.42	0.0040	0.0050	0.0139	0.0050	0.0100	0.00500	0.0300		
Sep 2006	0.044488	7.75	0.0015	0.0092	0.0145	0.0014	0.0052	0.00170	0.0300		
Oct 2006	0.078690	7.58	0.0015	0.0068	0.0111	0.0021	0.0063	0.00170	0.1000		
Nov 2006	0.107330	7.58	0.0015	0.0037	0.0166	0.0021	0.0033	0.00170	0.0307		
Dec 2006	0.091198	7.18	0.0015	0.0200	0.0100	0.0050	0.0050	0.00170	0.0226		
Jan 2007	0.089990	7.58	0.0003	0.0123	0.0400	0.0015	0.0048	0.00039	0.1320	0.0100	
Minimum	0.034171	6.68	0.0003	0.0037	0.0091	0.0014	0.0033	0.00039	0.0226	0.0100	
Maximum	0.107330	7.88	0.0040	0.0334	0.0400	0.0082	0.0801	0.00500	0.1320	0.0200	
Total	0.836015	88.57	0.0177	0.1526	0.1999	0.0448	0.2233	0.02204	0.6767	0.0400	
Average	0.069668	7.38	0.0015	0.0127	0.0167	0.0038	0.0186	0.00184	0.0564	0.0133	

Month	SII Flow	SII pH	SII Cd (T)	SII Cr (T)	SII Cu (T)	SII Pb (T)	SII Ni (T)	SII Ag (T)	SII Zn (T)	SII CN (T)
	MGD 12601	SU 12619	lbs/day 12740	lbs/day 12741	lbs/day 12742	lbs/day 12744	lbs/day 12747	lbs/day 12749	lbs/day 12751	lbs/day 12743
Feb 2006	0.096939	7.80	0.0012	0.0270	0.0116	0.0066	0.0207	0.00138	0.0541	
Mar 2006	0.052914	7.88	0.0004	0.0064	0.0103	0.0014	0.0362	0.00060	0.0201	0.0043
Apr 2006	0.077217	7.33	0.0010	0.0051	0.0059	0.0021	0.0103	0.00110	0.0193	
May 2006	0.056955	6.68	0.0005	0.0068	0.0065	0.0026	0.0238	0.00081	0.0143	
Jun 2006	0.052987	6.84	0.0004	0.0073	0.0084	0.0016	0.0054	0.00075	0.0375	
Jul 2006	0.034171	6.98	0.0004	0.0026	0.0042	0.0011	0.0014	0.00048	0.0212	0.0057
Aug 2006	0.053136	7.42	0.0018	0.0022	0.0062	0.0022	0.0044	0.00222	0.0133	
Sep 2006	0.044488	7.75	0.0006	0.0034	0.0054	0.0005	0.0019	0.00063	0.0111	
Oct 2006	0.078690	7.58	0.0010	0.0044	0.0073	0.0014	0.0041	0.00112	0.0657	
Nov 2006	0.107330	7.58	0.0013	0.0033	0.0149	0.0018	0.0030	0.00152	0.0275	
Dec 2006	0.091198	7.18	0.0011	0.0152	0.0076	0.0038	0.0038	0.00129	0.0172	
Jan 2007	0.089990	7.58	0.0002	0.0092	0.0300	0.0011	0.0036	0.00029	0.0991	0.0075
Minimum	0.034171	6.68	0.0002	0.0022	0.0042	0.0005	0.0014	0.0003	0.0111	
Maximum	0.107330	7.88	0.0018	0.0270	0.0300	0.0066	0.0362	0.0022	0.0991	
Total	0.836015	88.57	0.0099	0.0931	0.1182	0.0264	0.1187	0.0122	0.4004	
Average	0.069668	7.38	0.0008	0.0077	0.0099	0.0022	0.0099	0.0010	0.0334	0.0058

Superior Industries International (SII) Summary Report - Metals

Month	SII Al (T) mg/l 12636	SII Sb (T) mg/l 12637	SII As (T) mg/l 12638	SII Be (T) mg/l 12639	SII Hg (T) mg/l 12645	SII Mo (T) mg/l 12646	SII Se (T) mg/l 12648	SII TI (T) mg/l 12650	SII Phenol mg/l 12652
Feb 2006	10.1000								
Mar 2006	55.1000	0.0007	0.0011	0.0003		0.0033	0.0004	0.0006	
Apr 2006	2.3400								
May 2006	4.1600								
Jun 2006	8.4700								
Jul 2006	2.6000								
Aug 2006	1.6000								
Sep 2006	3.5900								
Oct 2006	2.0200								
Nov 2006	4.2800								
Dec 2006	2.5200								
Jan 2007	2.7300								
Minimum	1.6000	0.0007	0.0011	0.0003		0.0033	0.0004	0.0006	
Maximum	55.1000	0.0007	0.0011	0.0003		0.0033	0.0004	0.0006	
Total	99.5100	0.0007	0.0011	0.0003		0.0033	0.0004	0.0006	
Average	8.2925	0.0007	0.0011	0.0003		0.0033	0.0004	0.0006	
Month	SII Al (T) lbs/day 12736	SII Sb (T) lbs/day 12737	SII As (T) lbs/day 12738	SII Be (T) lbs/day 12739	SII Hg (T) lbs/day 12745	SII Mo (T) lbs/day 12746	SII Se (T) lbs/day 12748	SII TI (T) lbs/day 12750	SII Phenol lbs/day 12752
Feb 2006	8.1705								
Mar 2006	24.9677	0.0003	0.0005	0.0001		0.0014	0.0002	0.0003	
Apr 2006	1.5078								
May 2006	1.9772								
Jun 2006	3.7452								
Jul 2006	0.7414								
Aug 2006	0.7095								
Sep 2006	1.3328								
Oct 2006	1.3265								
Nov 2006	3.8335								
Dec 2006	1.9178								
Jan 2007	2.0501								
Minimum	0.7095	0.0003	0.0005	0.0001		0.0014	0.0002	0.0003	
Maximum	24.9677	0.0003	0.0005	0.0001		0.0014	0.0002	0.0003	
Total	52.2800	0.0003	0.0005	0.0001		0.0014	0.0002	0.0003	
Average	4.3567	0.0003	0.0005	0.0001		0.0014	0.0002	0.0003	

Superior Industries International Inc. (SII) Summary - Nutrients

Month	SII Flow MGD	SII CBOD mg/l	SII TSS mg/l	SII TVSS mg/l	SII NH3-N mg/l	SII NO3-N mg/l	SII NO2-N mg/l	SII PO4-P mg/l	SII T-P mg/l	SII O/G mg/l
Feb 2006	0.096939								10.90	
Mar 2006	0.052914	40.00	31.00		0.02			0.24	2.22	5.8
Apr 2006	0.077217								2.32	
May 2006	0.056955								2.62	
Jun 2006	0.052987								3.30	
Jul 2006	0.034171								3.48	
Aug 2006	0.053136								2.54	
Sep 2006	0.044488								6.24	
Oct 2006	0.078690								7.22	
Nov 2006	0.107330								3.40	
Dec 2006	0.091198								3.17	
Jan 2007	0.089990								12.50	
Minimum	0.034171	40.00	31.00		0.02			0.24	2.22	5.8
Maximum	0.107330	40.00	31.00		0.02			0.24	12.50	5.8
Total	0.836015	40.00	31.00		0.02			0.24	59.91	5.8
Average	0.069668	40.00	31.00		0.02			0.24	4.99	5.8

Month	SII Flow MGD	SII CBOD lbs/day	SII TSS lbs/day	SII TVSS lbs/day	SII NH3-N lbs/day	SII NO3-N lbs/day	SII NO2-N lbs/day	SII PO4-P lbs/day	SII T-P lbs/day	SII Temp. Deg C
Feb 2006	0.096939								8.82	
Mar 2006	0.052914	17.20	13.33		0.01			0.10	1.00	2.8
Apr 2006	0.077217								1.49	
May 2006	0.056955								1.25	
Jun 2006	0.052987								1.46	
Jul 2006	0.034171								0.99	
Aug 2006	0.053136								1.13	
Sep 2006	0.044488								2.32	
Oct 2006	0.078690								4.74	
Nov 2006	0.107330								3.05	
Dec 2006	0.091198								2.41	
Jan 2007	0.089990								9.39	
Minimum	0.034171	17.20	13.33		0.01			0.10	0.99	2.8
Maximum	0.107330	17.20	13.33		0.01			0.10	9.39	2.8
Total	0.836015	17.20	13.33		0.01			0.10	38.04	2.8
Average	0.069668	17.20	13.33		0.01			0.10	3.17	2.8

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RM) = 7.9 × (number of hides)/lbs of raw material

TSS Adjustment (kg/kg RM) = 6.2 × (number of hides)/kg of raw material (lb/1,000 lb RM) = 13.6 × (number of hides)/lbs of raw material

[51 FR 25001, July 9, 1986]

PART 433—METAL FINISHING POINT SOURCE CATEGORY

Subpart A—Metal Finishing Subcategory

Sec.

433.10 Applicability; description of the metal finishing point source category.

433.11 Specialized definitions.

433.12 Monitoring requirements.

433.13 Effluent limitations representing the degree of effluent reduction attainable by applying the best practicable control technology currently available (BPT).

433.14 Effluent limitations representing the degree of effluent reduction attainable by applying the best available technology economically achievable (BAT).

433.15 Pretreatment standards for existing sources (PSES).

433.16 New source performance standards (NSPS).

433.17 Pretreatment standards for new sources (PSNS).

AUTHORITY: Secs. 301, 304(b), (c), (e), and (g), 306(b) and (c), 307(b) and (c), 308 and 501 of the Clean Water Act (the Federal Water Pollution Control Act Amendments of 1971, as amended by the Clean Water Act of 1977) (the "Act"); 33 U.S.C. 1311, 1314(b), (c), (e), and (g), 1316(b) and (c), 1317(b) and (c), 1318 and 1361; 86 Stat. 816, Pub. L. 92-500; 91 Stat. 1567, Pub. L. 95-217.

SOURCE: 48 FR 32485, July 15, 1983, unless otherwise noted.

Subpart A—Metal Finishing Subcategory

§ 433.10 Applicability; description of the metal finishing point source category.

(a) Except as noted in paragraphs (b) and (c), of this section, the provisions of this subpart apply to plants which perform any of the following six metal finishing operations on any basis material: Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating, and coloring), Chemical Etching and Milling, and Printed Circuit Board Manufacture. If any of those six operations are present, then this part applies to discharges from those

operations and also to discharges from any of the following 40 process operations: Cleaning, Machining, Grinding, Polishing, Tumbling, Burnishing, Impact Deformation, Pressure Deformation, Shearing, Heat Treating, Thermal Cutting, Welding, Brazing, Soldering, Flame Spraying, Sand Blasting, Other Abrasive Jet Machining, Electric Discharge Machining, Electrochemical Machining, Electron Beam Machining, Laser Beam Machining, Plasma Arc Machining, Ultrasonic Machining, Sintering, Laminating, Hot Dip Coating, Sputtering, Vapor Plating, Thermal Infusion, Salt Bath Descaling, Solvent Degreasing, Paint Stripping, Painting, Electrostatic Painting, Electropainting, Vacuum Metalizing, Assembly, Calibration, Testing, and Mechanical Plating.

(b) In some cases effluent limitations and standards for the following industrial categories may be effective and applicable to wastewater discharges from the metal finishing operations listed above. In such cases these part 433 limits shall not apply and the following regulations shall apply:

Nonferrous metal smelting and refining (40 CFR part 421)

Coil coating (40 CFR part 465)

Porcelain enameling (40 CFR part 466)

Battery manufacturing (40 CFR part 461)

Iron and steel (40 CFR part 420)

Metal casting foundries (40 CFR part 464)

Aluminum forming (40 CFR part 467)

Copper forming (40 CFR part 468)

Plastic molding and forming (40 CFR part 463)

Nonferrous forming (40 CFR part 471)

Electrical and electronic components (40 CFR part 469)

(c) This part does not apply to:

(1) Metallic platemaking and gravure cylinder preparation conducted within or for printing and publishing facilities; and

(2) Existing indirect discharging job shops and independent printed circuit board manufacturers which are covered by 40 CFR part 413.)

[48 FR 32485, July 15, 1983; 48 FR 43682, Sept. 26, 1983; 48 FR 45105, Oct. 3, 1983; 51 FR 40421, Nov. 7, 1986]

§ 433.11 Specialized definitions.

The definitions set forth in 40 CFR part 401 and the chemical analysis methods set forth in 40 CFR part 136

§ 433.12

- (PCB-polychlorinated biphenyls)
- PCB-1242 (Arochlor 1242)
- PCB-1254 (Arochlor 1254)
- PCB-1221 (Arochlor 1221)
- PCB-1232 (Arochlor 1232)
- PCB-1248 (Arochlor 1248)
- PCB-1260 (Arochlor 1260)
- PCB-1016 (Arochlor 1016)
- Toxaphene
- 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)

[48 FR 32485, July 15, 1983; 48 FR 43682, Sept. 26, 1983, as amended at 51 FR 40421, Nov. 7, 1986]

§ 433.12 Monitoring requirements.

(a) In lieu of requiring monitoring for TTO, the permitting authority (or, in the case of indirect dischargers, the control authority) may allow dischargers to make the following certification statement: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting [or control] authority." For direct dischargers, this statement is to be included as a "comment" on the Discharge Monitoring Report required by 40 CFR 122.44(i), formerly 40 CFR 122.62(i). For indirect dischargers, the statement is to be included as a comment to the periodic reports required by 40 CFR 403.12(e). If monitoring is necessary to measure compliance with the TTO standard, the industrial discharger need analyse for only those pollutants which would reasonably be expected to be present.

(b) In requesting the certification alternative, a discharger shall submit a solvent management plan that specifies to the satisfaction of the permitting authority (or, in the case of indirect dischargers, the control authority) the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater. For direct dis-

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chargers, the permitting authority shall incorporate the plan as a provision of the permit.

(c) Self-monitoring for cyanide must be conducted after cyanide treatment and before dilution with other streams. Alternatively, samples may be taken of the final effluent, if the plant limitations are adjusted based on the dilution ratio of the cyanide waste stream flow to the effluent flow.

(Approved by the Office of Management and Budget under control number 2040-0074)

[48 FR 32485, July 15, 1983; 48 FR 43682, Sept. 26, 1983, as amended at 49 FR 34823, Sept. 4, 1984]

§ 433.13 Effluent limitations representing the degree of effluent reduction attainable by applying the best practicable control technology currently available (BPT).

(a) Except as provided in 40 CFR 125.30 through 125.32, any existing point source subject to this subpart must achieve the following effluent limitations representing the degree of effluent reduction attainable by applying the best practicable control technology currently available (BPT):

BPT EFFLUENT LIMITATIONS

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
Cadmium (T)	0.69	0.26
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO	2.13
Oil & Grease	52	26
TSS	60	31
pH	(¹)	(¹)

¹ Within 6.0 to 9.0.

(b) Alternatively, for industrial facilities with cyanide treatment, and upon agreement between a source subject to those limits and the pollution control authority, the following amenable cyanide limit may apply in place of the total cyanide limit specified in paragraph (a) of this section:

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§ 433.16

(e) An existing source subject to this subpart shall comply with a daily maximum pretreatment standard for TTO of 4.57 mg/l.

(f) Compliance with the provisions of paragraph (c), (d), and (e) of this section shall be achieved as soon as possible, but not later than June 30, 1984, however metal finishing facilities which are also covered by part 420 (iron and steel) need not comply before July 10, 1985. Compliance with the provisions of paragraphs (a) and (b) of this section shall be achieved as soon as possible, but not later than February 15, 1986.

[48 FR 32485, July 15, 1983, as amended at 48 FR 41410, Sept. 15, 1983; 48 FR 43682, Sept. 26, 1983]

§ 433.16 New source performance standards (NSPS).

(a) Any new source subject to this subpart must achieve the following performance standards:

NSPS		
Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
	Milligrams per liter (mg/l)	
Cadmium (T)	0.11	0.07
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO	2.13	
Oil and Grease	52	26
TSS	60	31
pH	(¹)	(¹)

¹ Within 6.0 to 9.0.

(b) Alternatively, for industrial facilities with cyanide treatment, and upon agreement between a source subject to those limits and the pollution control authority, the following amenable cyanide limit may apply in place of the total cyanide limit specified in paragraph (a) of this section:

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
	Milligrams per liter (mg/l)	
Cyanide (A)	0.86	0.32

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(c) No user subject to the provisions of this subpart shall augment the use of process wastewater or otherwise dilute the wastewater as a partial or total substitute for adequate treatment to achieve compliance with this limitation.

[48 FR 32485, July 15, 1983; 48 FR 43682, Sept. 26, 1983]

§ 433.17 Pretreatment standards for new sources (PSNS).

(a) Except as provided in 40 CFR 403.7, any new source subject to this subpart that introduces pollutants into a publicly owned treatment works must comply with 40 CFR part 403 and achieve the following pretreatment standards for new sources (PSNS):

PSNS		
Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
	Milligrams per liter (mg/l)	
Cadmium (T)	0.11	0.07
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO	2.13	

(b) Alternatively, for industrial facilities with cyanide treatment, and upon agreement between a source subject to these limits and the pollution control authority, the following amenable cyanide limit may apply in place of the total cyanide limit specified in paragraph (a) of this section:

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
	Milligrams per liter (mg/l)	
Cyanide (A)	0.86	0.32

(c) No user subject to the provisions of this subpart shall augment the use of process wastewater or otherwise dilute the wastewater as a partial or total substitute for adequate treatment to achieve compliance with this limitation.

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Aluminum foundries (SIC 3365)

US Industry Profile

Aluminum foundries

(SIC 3365)

This category includes establishments primarily engaged in manufacturing aluminum (including alloys) castings, except die-castings, which are classified in SIC 3363: Aluminum Die-Castings.

NAICS CODE(S)

331524 (Aluminum Foundries)

INDUSTRY SNAPSHOT

Aluminum foundries create castings by pouring heated, liquefied metal into hollowed-out molds. As the molten metal cools, it hardens and assumes the shape created by the mold's cavity. Aluminum foundries typically work with metal purchased in the form of ingots from primary producers or from secondary aluminum recyclers. Some foundries located in close proximity to primary smelters obtain aluminum in molten form.

Aluminum foundry shipments grew to \$4.41 billion in 2000, up from \$4.22 billion in 1999 and from \$3.91 billion in 1997. Although industry shipments grew steadily throughout the late 1990s, employment declined slightly from 35,234 in 1998 to 35,108 in 2000.

The largest user of aluminum castings is the automotive industry. Overall automotive content doubled in the 1990s, as car companies incorporated more aluminum to help reduce vehicle weight and meet federally mandated fuel efficiency standards. In the late 1990s, 92.5 percent of all aluminum used in the automotive industry was in the form of castings. The second largest market for aluminum was in containers and packaging such as food containers, beverage cans, and institutional and household foil. Building and construction were the third largest market for cast aluminum products.

A total of 625 establishments were involved in aluminum casting in the late 1990s. Only 276 of these companies employed 20 or more workers. With 81 companies, California had the greatest number of aluminum foundries in the United States, followed by Ohio with 80, and Pennsylvania with 45.

BACKGROUND AND DEVELOPMENT

Aluminum is the most abundant metal in the earth's crust, but it never occurs naturally in isolation. It is a component of many gem stones such as rubies, turquoise, and jade, and it exists in the mineral bauxite. Clays with high aluminum content were used to make pottery in prehistoric times, and aluminum compounds were used by several ancient civilizations as well. The ability to break the chemical bonds between aluminum and other elements to produce the isolated metal was first discovered during the 1800s.

Bauxite, the source for virtually all modern aluminum, was first discovered in Les Baux, France in 1821. Advances made during the nineteenth century in chemistry and electrolysis made practical the commercial production of aluminum metal from bauxite. In 1855, aluminum cost \$115 per pound, but improvements in chemical production led to price reductions. By 1859, the price had dropped to \$17 per pound.

Although falling prices permitted the introduction of some aluminum products such as surgical instruments and novelty items, aluminum was still too expensive to gain widespread industrial use. The most important breakthrough came later in the century when Charles Martin Hall of the United States and Paul L. T. Haroult of France independently developed commercial aluminum production methods based on electrolysis. As a result, by the turn of the twentieth century, aluminum prices had dropped to \$0.33 per pound.

One of the most famous aluminum castings in the United States was placed on the tip of the Washington Monument in 1884. The first aluminum household utensils were created during the 1890s and gained popularity during the early 1900s. By the mid-1960s, more than half of the cookware on the U.S. market was aluminum.

In 1903, aluminum reached new heights when Wilbur and Orville Wright launched the Kitty Hawk Flyer. Its converted engine contained 30 pounds of aluminum parts.

During World War I, items such as canteens, mess kits, ammunition cases, and tent pins were made from cast aluminum. The emerging automotive industry required engines, manifolds, crankcases, oil pans, and valve covers. World War II increased aluminum casting demands by the military, and brought growing needs within the aeronautic industry.

Modern Casting Techniques. During the mid-twentieth century, aluminum foundries relied on several different casting technologies to meet the diverse demands of their customers. The casting techniques are differentiated by the type of mold used and the process by which the molds are filled. One of the most common types of casting is called "sand casting." Sand castings are created using molds formed from precise blends of sands, clays, and moisture. After a mold is formed, molten aluminum is poured into it. When the aluminum hardens, the sand is removed. The advantages of sand casting are its versatility and low cost for producing small quantities. Its principle disadvantage is its slowness compared to other casting methods.

Shell mold casting is a type of sand casting that relies on a thin mold made of preformed, baked sand. Plaster mold casting is similar to sand casting but molds are fabricated from plaster instead of sand. Plaster mold casting produces products with an improved surface finish.

Permanent mold castings employ molds made of iron or steel into which aluminum is poured. Although aluminum die-casting also uses permanent steel molds, it differs from permanent mold casting by using pressure to force the molten aluminum into the dies, instead of relying on gravity. Permanent mold casting technology produces the strongest castings.

Investment casting is a complex type of casting in which two or more permanent molds are assembled with an intervening wax lining or in which a wax shape is formed and dipped into a special liquid ceramic. When dried, the ceramic creates a shell around the shape. In both cases, the wax is heated and drained to create a hollow for the liquid aluminum. Because the melted wax is drained out of the mold, investment casting is sometimes referred to as the "lost wax" method. After cooling, the mold is broken and an exact aluminum replica of the former wax image remains. One advantage of investment casting is its ability to duplicate intricate patterns.

One of the most recently developed casting processes is called expendable pattern casting, sometimes referred to as "lost foam casting" or "evaporative foam pattern casting." Expendable pattern casting employs a polystyrene pattern made from fused polystyrene beads surrounded by a special sand pack. When liquid aluminum is poured into the mold the polystyrene vaporizes. This procedure yields a casting of the same dimensions as the pattern. Thus, the process holds many advantages such as a reduction in finishing costs and an improved ability to make more complicated designs. According to one estimate, production cost savings associated with expendable pattern casting are as much as 50 percent over traditional casting techniques.

Why Aluminum? Many industrial users favor aluminum because of its physical and chemical properties. Aluminum reflects light, conducts heat and electricity, and weighs only one-third as much as an equal volume of steel. It is also nonmagnetic, nontoxic, and naturally resistant to corrosion. Cast aluminum products are made of pure aluminum or aluminum alloys. Pure industrial aluminum is defined as aluminum containing less than 1 percent impurities. Many of the alloys incorporated into

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Water



Development **Final**

**Document for
Effluent Limitations
Guidelines and
Standards for the
Metal Molding and Casting
(Foundries)**

Point Source Category

A-30

[Code of Federal Regulations]
 [Title 40, Volume 27]
 [Revised as of July 1, 2003]
 From the U.S. Government Printing Office via GPO Access
 [CITE: 40CFR464.02]

[Page 553-554]

TITLE 40--PROTECTION OF ENVIRONMENT

CHAPTER I--ENVIRONMENTAL PROTECTION AGENCY (CONTINUED)

PART 464--METAL MOLDING AND CASTING POINT SOURCE CATEGORY--Table of Contents

Sec. 464.02 General definitions.

In addition to the definitions set forth in 40 CFR part 401, the following definitions apply to this part:

(a) Aluminum casting. The remelting of aluminum or an aluminum alloy to form a cast intermediate or final product by pouring or forcing the molten metal into a mold, except for ingots, pigs, or other cast shapes related to nonferrous (primary and secondary) metals manufacturing (40 CFR part 421) and aluminum forming (40 CFR part 467). Processing operations following the cooling of castings not covered under aluminum forming, except for grinding scrubber operations which are covered here, are covered under the electroplating and metal finishing point source categories (40 CFR parts 413 and 433).

(b) Copper casting. The remelting of copper or a copper alloy to form a cast intermediate or final product by pouring or forcing the molten metal into a mold, except for ingots, pigs, or other cast shapes related to nonferrous (primary and secondary) metals manufacturing (40 CFR part 421). Also excluded are casting of beryllium alloys in which beryllium is present at 0.1 or greater percent by weight and precious metals alloys in which the precious metal is present at 30 or greater percent by weight. Except for grinding scrubber operations which are covered here, processing operations following the cooling of castings are covered under the electroplating and metal finishing point source categories (40 CFR parts 413 and 433).

(c) Ferrous casting. The remelting of ferrous metals to form a cast intermediate or finished product by pouring the molten metal into a mold. Except for grinding scrubber operations which are covered here, processing operations following the cooling of castings are covered under the electroplating and metal finishing point source categories (40 CFR parts 413 and 433).

(d) Zinc casting. The remelting of zinc or zinc alloy to form a cast intermediate or final product by pouring or forcing the molten metal into a mold, except for ingots, pigs, or other cast shapes related to nonferrous (primary) metals manufacturing (40 CFR part 421) and nonferrous metals forming (40 CFR part 471). Processing operations following the cooling of castings not covered under nonferrous metals forming are covered under the electroplating

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and metal finishing point source categories (40 CFR parts 413 and 433).

(e) POTW shall mean ``publicly owned treatment works.''

(f) A non-continuous discharger is a plant which does not discharge pollutants during specific periods of time for reasons other than treatment plant upset, such periods being at least 24 hours in duration. A typical example of a non-continuous discharger is a plant where wastewaters are routinely stored for periods in excess of 24 hours to be treated on a batch basis. For non-continuous discharging direct

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widespread to allow the Agency to characterize properly these miscellaneous wastestreams. Thus, EPA is unable to establish nationally-applicable effluent limitations guidelines and standards for process segments other than those listed above. Permit writers and municipal authorities will use their best professional judgement in establishing technology-based effluent limitations and standards for those miscellaneous streams not covered by the final metal molding and casting industry regulations.

SUBCATEGORY AND PROCESS SEGMENT DEFINITIONS

Metal molding and casting is defined as the remelting of a metal or metal alloy to form an intermediate or final cast product by pouring or forcing the molten metal into a mold. The casting of ingots, pigs, or other cast shapes following primary metal smelting is not included in the metal molding and casting category; it is regulated by the nonferrous metals manufacturing guidelines (40 CFR Part 421). The casting of aluminum or zinc performed as an integral part of aluminum or zinc forming, and conducted on-site at an aluminum or zinc forming plant, is covered by the respective metal forming regulation (40 CFR Part 467 for Aluminum, Part 471 for Zinc). The metal molding and casting category includes the aluminum, copper, ferrous, magnesium, and zinc casting subcategories. A production process is considered to be in a particular metal subcategory if the molten metal contains, on average, greater than 50 percent by weight of that metal, or if the metal comprises the greatest percentage of the metal, measured by weight. The casting of copper-beryllium alloys where beryllium is present at 0.1 or greater percent by weight and the casting of copper-precious metal alloys in which the precious metal is present at 30 or greater, percent by weight are excluded from regulation in the metal molding and casting category. In the following sections, the sources of process wastewaters regulated under each manufacturing process segment are defined. The process segments themselves have been described in Section III of this document.

Aluminum Casting Subcategory

1. Casting Cleaning Wastewater - Wastewater that originates from the application of water to a cast product (casting) to rid it of impurities such as die lubricants or sand. Casting cleaning wastewater does not include wastewater that originates from the rinsing of castings produced by investment casting processes; that wastewater is regulated under investment casting.
2. Casting Quench Wastewater - Wastewater that originates from the immersion of a hot casting in a water bath to cool the casting rapidly, or to change the metallurgical properties of the casting.

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3. Die Casting Wastewater - Die casting wastewater includes two types of wastewater discharges: leakage of hydraulic fluid from hydraulic systems associated with die casting operations, and the discharge of die lubricants. Any process water used for the cooling of dies or castings still contained in dies is not considered die casting wastewater; rather, it is mold cooling wastewater.
4. Dust Collection Scrubber Wastewater - Wastewater that originates from the removal of dust from air in a scrubber, when water or process wastewater is used as a cleaning medium. The dust may originate with sand preparation, sand molding, core making, sand handling and transfer, the removal of sand from the casting (including "shake-out," shot-blasting, and sand blasting), or other foundry floor dust sources. Wastewater that originates from pouring floor, pouring ladle, and transfer ladle fume scrubbing also is included when these fumes are collected in an air duct system common with sand dusts. Wastewater that originates from dust collection scrubbers associated with investment casting operations are regulated under the investment casting process segment.
5. Grinding Scrubber Wastewater - Wastewater that originates from the removal of grinding dust from air in a scrubber, when water or process wastewater is used as a cleaning medium. Grinding dust is generated during the mechanical abrading, or preliminary grinding of castings following removal from the mold.
6. Investment Casting Wastewater - Wastewater generated during investment mold backup, hydroblast cleaning of investment castings, and the collection of dust resulting from the hydroblasting of castings and the handling of the investment material. Operations generating investment casting wastewaters are sometimes called lost wax, lost pattern, hot investment, or precision casting processes.
7. Melting Furnace Scrubber Wastewater - Wastewater generated during the removal of dust and fumes from furnace exhaust gases in a scrubber, when water or process wastewater is used as a cleaning medium. The dust and fumes are generated by melting or holding furnace operations and are expelled in the exhaust gases from these operations. Wastewater from pouring floor, pouring ladle, and transfer ladle fume scrubbing also is included when the fumes from those operations are collected in an air duct system common with the melting or holding furnace fumes.
8. Mold Cooling Wastewater - Wastewater that originates from the direct spray cooling of a mold or die, or of the casting, in an open mold. Water that circulates in a noncontact cooling water system in the interior of a mold is not considered mold cooling process wastewater unless it leaks from the system and is commingled with other process



Rogers Water Utilities

ROGERS POLLUTION CONTROL FACILITY

"SERVING ROGERS - PROTECTING THE ENVIRONMENT"

FOR ADEER A. GULLIAN

Permit No.: 07-PLP

INDUSTRIAL USER DISCHARGE PERMIT

In accordance with the provisions and conditions of Ordinance No. 83-23 of the Rogers City Code, and also any applicable provisions of Federal or State laws or regulations,

PREFORMED LINE PRODUCTS COMPANY

2740 South First Street
Rogers, Arkansas 72756

is hereby authorized by the City of Rogers, Arkansas, to discharge industrial wastewaters from its aluminum forming operations located at the above address into the City of Rogers' wastewater treatment system in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any and or all applicable pretreatment regulations, standards, or requirements under local, state, and Federal laws, including any such regulations, standards, requirements, or laws that become effective during the term of this permit.

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

This permit shall become effective on March 1, 2007, and shall expire at midnight on December 31, 2009.

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of the Rogers City Code, a minimum of 90 days prior to the expiration date.

Signed this 13th day of February 2007

Control Authority
S. Luanne Diffin
Environmental Services Coordinator

PART I PERMIT REQUIREMENTS

SECTION A. EFFLUENT LIMITATIONS

1. Description of Wastestream Locations

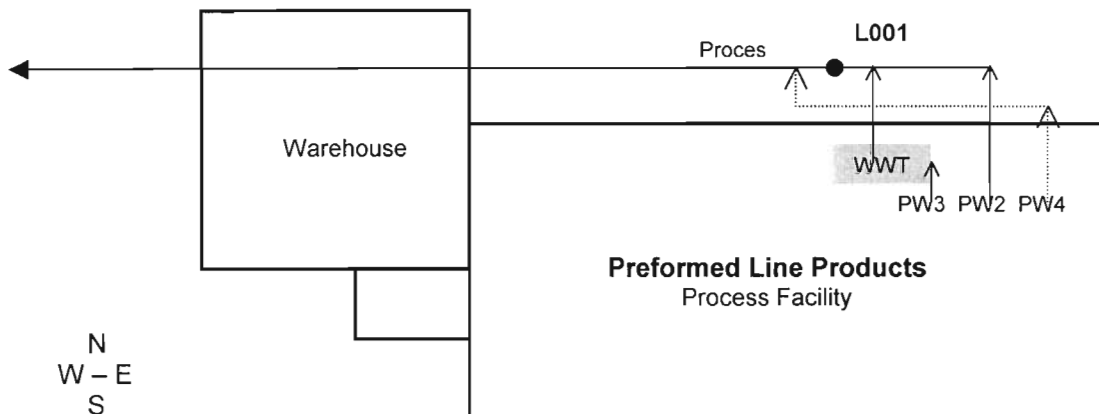
During the period of March 1, 2007 through December 31, 2009, the permittee is authorized to discharge process wastewater to the City of Rogers wastewater collection system from the following locations:

(a) Location 001 Location 001 is a monitoring site flume located outside along the north central wall of the facility and downstream of the aluminum forming process wastestreams. Location 001 consists of the process-only wastewater from the following regulated cleaning and rinsing aluminum forming operations:

PW2 Regulated process wastestream from the aluminum and galvanized rinse tank. The rinse tank contains water used to rinse product that has been dipped in either the aluminum wash or the galvanized wash tanks. The 4000-gallon wastestream is batch discharged on the average 3 times a week directly to the collection system. There are approximately 2 process days contained in each batch discharge.

PW3 Regulated process wastestream from the aluminum cleaning tank. The 4000-gallon wastestream is batch discharged every 4-6 weeks to the 5500-gallon pretreatment holding tank. The wastestream is then pretreated prior to discharge to the collection system. There are approximately 30 process days contained in each batch discharge.

The following is a schematic of the process wastestreams and sampling location:



A 4 b

- (b) PW4 Wastestream PW4 is an unregulated process wastestream consisting of the wastewater from the galvanized cleaning tank. The 4000-gallon tank is batch discharged every 4-6 weeks directly into the collection system downstream of Location 001.
- (c) Sanitary The discharge shall comply with 40 CFR Part 403 General Pretreatment Regulations and with all applicable regulations and standards contained in the City Code.

Discharges from Location 001 flow west, join PW4 and the sanitary wastestreams and then enter the city collection system along the western property line.

2. Rational for Effluent Limitations

The rational for determining the effluent discharge limits is based on several conditions:

- (a) The categorical regulated processes conducted by the permittee include drawing core, cleaning bath and cleaning rinse. The pretreatment standards for these regulated processes are production based; lbs/Mlbs-off of aluminum drawn and lbs/Mlbs-off of aluminum cleaned. The permittee purchases wire that is drawn on-site, wire that is predrawn off-site and wire that does not need to be drawn. All wire is cleaned and then rinsed. Therefore the number of pounds drawn is consistently lower than the number of pounds cleaned and rinsed.
- (b) The regulated wastestreams are batch discharged to the sanitary system. The aluminum wash tank (PW3) is discharged to a holding tank, pretreated and then discharged to the sanitary system once a week. The rinse tank (PW2) is discharged 3 times a week directly to the sanitary system. Therefore, the total number of pounds of wire processed thru the wash tank and the rinse tank depends on the number of pounds washed or rinsed and the number of process contact days between discharges (pounds washed x number of contact days).
- (c) The permittee is experiencing an annual production rate fluctuation of greater than 20% due to erratic production demands. There were times in the past 12 months where there was limited wire drawn, cleaned and/or rinsed.

Based on these circumstances the Control Authority determined the effluent discharge limits for Permit 07-PLP shall be calculated using the discharge-specific conditions of production rate and process contact days for each monitoring period. The discharge permit limits are conditionally dynamic using the most stringent process limit for each pollutant and applied as one single permit limit independent the process wastestream.

3. Effluent Limitations

- (a) Location 001 Effective March 1, 2007, and lasting through December 31, 2009, the quality of the effluent discharged from Location 001 shall not exceed the following effluent limitations. In addition, the discharge shall comply with 40 CFR Part 403 General Pretreatment Regulations, 40 CFR Part 467 Aluminum Forming regulation Subpart E - Drawing with Neat Oils Part 467.55 pretreatment standards for existing sources (PSES), and with all applicable regulations and standards contained in the City Code. Effluent from this location shall only consist of process generated wastestreams. Any single analysis and/or measurement beyond the daily maximum and/or the monthly average shall be considered a violation of the conditions of this permit.

Effluent limits were calculated using 40 CFR 467.55 drawing core, contact cooling water and cleaning rinse categorical pretreatment standards and the current process specific production rate (CPR) for the batch monitoring period.

In addition to the calculated daily maximum and monthly average limits the permittee must comply with a technical review criteria (TRC). The TRC for metals is a numeric threshold of 20% above daily and monthly limits. The TRC for oil and grease is a numeric threshold of 40% above daily and monthly limits. The TRC limit is used to define a subcategory of SNC.

DAILY MAXIMUM LIMIT

<u>Pollutant</u>	<u>Core Std * CPR</u>	<u>Wash Std * CPR</u>	<u>Rinse Std * CPR</u>		
Chromium (T)	0.022 x CPR	+ 0.079 x CPR	+ 0.612 x CPR	=	Limit
Cyanide (T) ¹	0.015 x CPR	+ 0.052 x CPR	+ 0.404 x CPR	=	Limit
Zinc (T)	0.073 x CPR	+ 0.262 x CPR	+ 2.03 x CPR	=	Limit
TTO ²	0.035 x CPR	+ 0.124 x CPR	+ 0.96 x CPR	=	Limit
Oil and Grease ³	2.6 x CPR	+ 9.3 x CPR	+ 73 x CPR	=	Limit
Phosphorus (T)	Report Only				
pH	Within the range of 5.0 to 11.0 at all times				

¹ Periodic analyses for cyanide as may be required under 40 CFR Part 122 or 403 are not required when both of the following conditions are met:

- a. The first wastewater sample of each calendar year is analyzed and found to contain less than 0.07 mg/L cyanide
- b. The permittee certifies in writing to the Control Authority that cyanide is not and will not be used in the aluminum forming process.

² TTO shall mean the sum of the masses or concentrations of each of the toxic organic compounds listed in 40 CFR 467.02(q) that are found in the discharge at a concentration greater than 0.010 mg/L

³ The permittee may measure and report oil and grease in lieu of measuring and reporting TTO.

MONTHLY AVERAGE LIMIT¹

Pollutant	Core Std * CPR	Wash Std * CPR	Rinse Std * CPR			
Chromium (T)	0.009 x CPR	+ 0.033 x CPR	+ 0.251 x CPR	=	Limit	
Cyanide (T)	0.006 x CPR	+ 0.022 x CPR	+ 0.17 x CPR	=	Limit	
Zinc (T)	0.031 x CPR	+ 0.109 x CPR	+ 0.85 x CPR	=	Limit	
Oil and Grease	1.3 x CPR	+ 4.7 x CPR	+ 36 x CPR	=	Limit	
Phosphorus	Report Only					

¹ The monthly average limitation means the highest allowable average daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during the month.

- (b) Sanitary The discharge shall comply with all applicable regulations contained in the City Code. Effluent from this location shall consist of combined sanitary-only wastewater.

SECTION B. MONITORING REQUIREMENTS

1. Monitoring Requirements

As a minimum, the following parameters shall be monitored at Location 001 at the frequency and with the type of measurement indicated:

<u>Parameter</u>	<u>Frequency</u>	<u>Sample Type</u>
Flow, gpd	Daily/Monthly	Indicate/Totalize
Total Phosphate	Quarterly	24-hour Composite ¹
Chromium (T)	Quarterly	24-hour Composite ¹
Cyanide (T)	Quarterly	24-hour Composite ¹
Zinc (T)	Quarterly	24-hour Composite ¹
Oil and Grease	Quarterly	Discrete Grab ²
pH	Monthly	pH Grab ³

¹ 24-hour Composite sample is defined as a minimum of 12 samples collected at equal time intervals over a 24-hour period and combined proportional to flow or a sample collected at frequent intervals proportional to flow over the 24-hour period.

² Discrete grab sample is defined as a minimum of 4 representative samples collected equally over the monitoring period, each one individually preserved at the time of collection and composited for a single result or 1 representative sample collected and preserved where the permittee states that to the best of knowledge the discrete grab sample is representative of the daily operation.

³ pH grab sample is defined as an individual sample collected without regard for flow and time at a representative point in the discharge stream. A pH grab sample must be analyzed within 15 minutes of sample collection.

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2. Additional Monitoring Requirements

The permittee shall be required by the Control Authority to perform additional monitoring as necessary to:

- (a) Verify the absence of specific pollutants,
- (b) Determine the toxicity of the discharge through biomonitoring testing, and
- (c) Identify and assess uncontrolled discharge measures and pollution prevention options.

3. TTO Monitoring Alternative

As an alternative to monitoring for TTO, the permittee elected to measure and report oil and grease readings as specified in 40 CFR 467.03(b).

SECTION C. MONITORING REPORT REQUIREMENTS

1. Discharge Monitoring Report

All monitoring results obtained during the calendar month shall be summarized and reported on a discharge monitoring report (DMR) provided by the Control Authority. The DMR and copy of all analytical results shall be submitted to the Control Authority on or before the 15th of the month following the monitoring period. The DMR shall indicate the nature and concentration of all pollutants in the effluent that are regulated by the limits set forth in Part I Section A.2, and include measured daily flows and total monthly flows. DMRs shall be submitted even when no discharge occurs during the monitoring period. The DMR shall contain the following:

- (a) Industry name, address and contact representative;
- (b) Monitoring period;
- (c) Daily and monthly average pollutant concentration and loading results;
- (d) Total, average and daily flow readings;
- (e) Signatory certification statement; and
- (f) Signature of authorized representative.

The DMR shall be mailed or faxed to:

Control Authority
4300 Rainbow Road
Rogers, Arkansas 72758-1440
479-273-7627 (fax)

If, during any period, the permittee fails to comply with permit requirements and limitations, the permittee shall submit to the Control Authority as part of the DMR an explanation of the noncompliance, any known or suspected cause, and actions the permittee has taken to prevent further occurrences.

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**FACT SHEET FOR INDUSTRIAL USER
DISCHARGE PERMIT 07-KMT
Kennametal Incorporated**

The Control Authority for the City of Rogers has made a decision to reissue an industrial user discharge permit, effective **May 1, 2007**, to **Kennametal, Incorporated** for continuation of the discharge from its production activities to City of Rogers sanitary-sewer system. The decision to reissue a discharge permit is based on the determination that the discharge would not interfere with the treatment process or otherwise be incompatible with the sewage works or result in pass-through of pollutants such that Rogers' National Pollutant Discharge Elimination System (NPDES) permit would be violated. The purpose of this fact sheet is to present the facts and reasoning on the basis of which the decision was made.

1. INDUSTRY INFORMATION

Facility Name: Kennametal Incorporated

Facility Address: 205 North Thirteenth Street
PO Box 9
Rogers, AR 72756

Authorized Official: Gary Martineck, Site Manager
Phone: (479) 636-1515
Fax: (479) 636-6420
E-Mail Address: gary.martineck@kennametal.com

Facility Contact: Tim L. Bair, EHS Manager
Phone: (479) 621-4726
Fax: (479) 636-6420
E-Mail Address: tim.bair@kennametal.com

Facility Activity: Manufacturer of Machine Tool Accessories

Discharge Location: Location 001 Combined process and sanitary
Latitude: 36° 20' 06.91" N Longitude: 94° 08' 01.57" W

Summary:

NAIC/SIC	333515 / 3545
Process Operation:	Cutting Tool & Machine Tool Accessory Manufacturing
Categorical Classification:	Tungsten carbide sintered metal production
	Nonferrous Metals Forming and Metal Powders
	<u>Part 471.54 Subpart E Refractory Metals Forming PSES</u>
Significant Industrial User:	Yes, Categorical IU and Process flow >25,000 gpd
Previous Permit:	99-RTW
	Effective Date: 1/1/99
Permit:	07-KMT
	Effective Date: 5/1/07
	Expiration Date: 12/31/09
Current Status:	Compliant
CWF Applied:	Yes, regulated process and dilution wastestreams
TOMP:	Initial Submittal: 6/96
	Last Revision Submitted: 3/99
	Last Reviewed by Kennametal: 5/07
Slug Control Plan:	Initial Submittal: 5/96
	Last Revision: 3/01
	Last Reviewed: 5/07
Pollution Prevention Plan:	Initial Submittal: 9/96
	Last Revision: 5/07
	Last Reviewed:

General Description of the Organization

Kennametal Inc. is a global supplier of tooling, engineered components and advanced materials that are consumed in production processes. Kennametal provides a broad range of technologically advanced tools, tooling systems and engineering services. Kennametal's products use highly complex metallurgy and materials science in tungsten carbide powders, high-speed steels, ceramics, industrial diamond and other materials that are particularly resistant to heat, abrasion, pressure and wear in the production of metal cutting tools used in the mining and highway construction industries.

Kennametal was founded in 1938 and is headquartered in Latrobe, Pennsylvania. Kennametal is currently represented in more than 60 countries.

The facility began operations in Rogers in 1987 as Rogers Tool Works and changed ownership and name to Kennametal in September 2001. The facility produces many of the same products since start-up. There have been numerous production expansions and process relocations.

Summary of Compliance with Previous Permit

During the history of the previous permit the permittee experienced a cyanide violation during the December 2006 monitoring period. Kennametal identified the possible source of cyanide from the discharge of contaminated rinse water following an etching process. The etching solution contains potassium ferricyanide. The permittee initiated action to collect, contain and properly dispose of the rinse water. Subsequent samplings of the rinse water collection indicate that the effluent cyanide level is below and compliant with the permit limit.

The permittee was surcharged for discharging excess CBOD and TSS concentrations to the sanitary system during the April 2004 monitoring period. Although not confirmed nor repeated, the permittee believed the increase was related to a clean-up process.

Connection to Sewer System

There are two sewer discharge lines from Kennametal connecting to the sanitary system. Both connections are west of the facility to a main sanitary sewer line located in Thirteenth Street. The regulated process discharge line connects to the city sanitary sewer at manhole HM 7-43 after leaving the monitoring discharge outfall Location 001 located along the southwest corner of the facility. This wastestream consists of combined process generated wastestreams from the regulated refractory metal forming operations and dilution water from the tower blowdown, boiler blowdown and portion of the facility sanitary wastestreams

The non-regulated discharge line connects directly to the city sanitary sewer with no manhole access. This non-regulated non-process discharge line flows west from the facility from the northwest corner of the facility. The wastestream consists of a portion of combined facility sanitary wastestreams, A/C chillers and cooling tower blowdown water and laboratory waste.

Description of Operation

Kennametal manufactures metal-cutting tools, mining compacts, circuit board drill blanks and wear parts of cemented tungsten carbide. The manufacturing process consists of metal powder blending, pressing, sintering, finishing and coating of tungsten carbide. Kennametal is classified as a **Nonferrous Metals Forming and Metal Powers** manufacturer under **40CFR Part 471, Subpart E Refractory Metals Forming**. Kennametal's regulated production process is both continuous and batch. Kennametal produced 3,938,183 pounds of tungsten carbide in the twelve-month period of February 2006 through January 2007.

Raw Materials

Kennametal uses tungsten carbide, cobalt, paraffin wax, graphite and various trace metals in the production process.

Chemicals Used

Kennametal uses acetone, heptane, synthetic machine coolant, alkaline detergent, citric acid, alkaline rust remover, cooling tower scale and corrosion inhibitor, cooling tower biocide, ethylene glycol and propylene glycol.

Process Discharge Outfall

The process discharge outfall Location 001 is a monitoring site flume located outside the facility along the south wall on the west end of the processing facility. Latitude: 36° 20' 06.91" N Longitude: 94° 08' 01.57" W. The discharge flowing through the monitoring site flume consists of the facility combined process generated wastestreams from the regulated refractory metal forming operations and dilution water from the tower blowdown, boiler blowdown and a portion of the facility sanitary wastestreams. Kennametal connects to the city sanitary sewer downstream of Location 001 at manhole MH 7-43 in Thirteenth Street.

Kennametal discharged an average 0.0158 MGD at Location 001 (based on daily flow readings between February 2006 – January 2007). The total flow of 5.471078 MG and 303 production days, the overall average discharge is reported as 0.018056 MGD. Approximately 9,596 gallons/day consist of regulated process wastestreams. The tower blowdown contributes approximately 240 gallons/day of dilution water and the boiler blowdown contributes approximately 20 gallons/day of dilution water. In addition, there are two sanitary sections that contribute an additional 7,480 gallons/day and 720 gallons/day of dilution water.

$$\begin{aligned} \text{Average Daily Flow (MG)} &= \text{Total Flow (Feb 06 - Jan 07)} / \text{Production Days} \\ \text{Average Daily Flow (MG)} &= 5.471078 \text{ MG/year} / 303 = 0.018056 \text{ MGD} \end{aligned}$$

Average Process	Total Q	Regulated Q	Dilution Q
Regulated Process Lines	0.009596	0.009596	
Tower Blowdown	0.000240		0.000240
Boiler Blowdown	0.000020		0.000020
Sanitary (374 emp x 5 gal x 4 visits)	0.007480		0.007480
Sanitary (48 emp x 5 gal x 3 visits)	<u>0.000720</u>		<u>0.000720</u>
Total	0.018056	0.009596	0.008460

$$\begin{aligned} (\text{Total Q} - \text{Dilution Q}) / \text{Total Q} &= \text{CWF Factor} \\ (0.018056 - 0.008460) / 0.018056 &= 0.531 \end{aligned}$$

Kennametal is considered a continuous discharger. Kennametal discharges 7 days a week; however, the process-generated wastestream is considerably less on the weekends.

Production Data

Kennametal produces the finished product from the following regulated processes (**Part 471 Nonferrous Metals Forming and Metal Powders, Subpart E Refractory Metals Forming, PSES**):

Subpart	#prod/yr	M# prod/d	Units
(h) Equipment cleaning	3938183	0.012997	1
(l) Surface treatment baths	180529	0.000596	3
(m) Surface treatment rinse	180529	0.000596	3
(n) Alkaline cleaning bath	152904	0.000505	1
(o) Alkaline cleaning rinse	152904	0.000505	1
(q) Tumbling / burnishing	4649	0.000015	1
(s) Saw / grind emulsions	3938183	0.012997	1
(w) Miscellaneous wastewater	3938183	0.012997	1

Production days / year = 303

Pretreatment System

Kennametal is able to meet discharge limits without any pretreatment other than pH adjustment.

Flow Information

Primary Measuring Device:	ISCO ultrasonic flow meter (Model 4210), ISCO Refrigerated Autosampler (Model 2910R)
Total Regulated Process Flow:	9,596 gpd
Combined Sanitary Flow:	8,460 gpd
Total flow:	18,056 gpd

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Daily Maximum and Monthly Average Discharges

Kennametal submits monthly analytical data. The Control Authority conducts annual monitoring. The following is a reflection of the average concentration and loading readings (February 2006 – January 2007):

	<u>Average Concentration (mg/L)</u>	<u>Average Loading (lbs/day)</u>
Cadmium	0.0012	0.0002
Chromium	0.0126	0.0016
Copper	0.0295	0.0039
Lead	0.0035	0.0005
Nickel	0.0412	0.0044
Silver	0.0013	0.0002
Zinc	0.0796	0.0097
Molybdenum	0.0090	0.0012
Flouride	0.95	0.14
Cyanide	0.1072	0.0133
pH	within the range of 6.88 and 8.79	

A copy of Kennametal IU data shown above is included as **Attachment 1**.

2. BASIS FOR PERMIT LIMITS

Permit Application

A copy of Kennametal's current permit application is included as **Attachment 2**.

Analytical Data Summary

A summary of Kennametal's self-monitoring and compliance monitoring data is included as **Attachment 1**.

Federal, State, and Local Regulations

A copy of all regulations used to determine permit limits is included as **Attachment 3**.

Facility Plans and Flow Diagrams

Any pertinent facility plans and flow diagrams are included as **Attachment 4** and in **Kennametal Plan** file.

Rational for Effluent Limitations

Kennametal is classified as a Nonferrous Metals Forming and Metals Powders industry and is regulated by 40 CFR Part 471.54 Subpart E Refractory Metals Forming (PSES) due to operations of the following 8 subparts: (h) equipment cleaning, (l) surface treatment baths, (n) surface treatment rinse, (n) alkaline cleaning bath, (o) alkaline cleaning rinse, (q) tumbling or burnishing, (s) saw or grinding emulsions, (w) miscellaneous wastewater. Kennametal regulated process flow is 9,596 gpd with a dilution flow of 8,460 gpd. The Kennametal total average daily flow is 18,056 gpd. Due to the 8,460 gpd dilution water, the combined wastestream formula is used to calculate permit limits. Permit limits are derived using Nonferrous Metals and Metals Powders 40 CFR Part 471.54 pretreatment standards for existing sources (PSES) limits. Calculations included as **Attachment 5**.

Calculations

$$\begin{aligned} \text{Average Daily Flow (MG)} &= \text{Total Flow (Feb 06 - Jan 07)} / \text{Production Days} \\ \text{Average Daily Flow (MG)} &= 5.471078 \text{ MG/year} / 303 = \underline{0.018056 \text{ MGD}} \end{aligned}$$

<u>Average Process</u>	<u>Total Q</u>	<u>Regulated Q</u>	<u>Dilution Q</u>
Regulated Process Lines	0.009596	0.009596	
Tower Blowdown	0.000240		0.000240
Boiler Blowdown	0.000020		0.000020
Sanitary (374 emp x 5 gal x 4 visits)	0.007480		0.007480
Sanitary (48 emp x 5 gal x 3 visits)	<u>0.000720</u>		<u>0.000720</u>
Total	0.018056	0.009596	0.008460

$$\begin{aligned} (\text{Total Q} - \text{Dilution Q}) / \text{Total Q} &= \text{CWF Factor} \\ (0.018056 - 0.008460) / 0.018056 &= 0.531 \end{aligned}$$

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Copper - Daily Maximum and Monthly Average Loading Limits

Subpart	M# prod/d	Units	Daily Maximum	Monthly Average
(h) Equipment cleaning	0.012997	x 1 x	0.259 = .003366	0.136 = .001768
(l) Surface treatment baths	0.000596	x 3 x	0.739 = .001321	0.389 = .000695
(m) Surface treatment rinse	0.000596	x 3 x	23 = .041111	12.1 = .021628
(n) Alkaline cleaning bath	0.000505	x 1 x	0.635 = .000320	0.334 = .000169
(o) Alkaline cleaning rinse	0.000505	x 1 x	15.5 = .007822	8.16 = .004118
(q) Tumbling or burnishing	0.000015	x 1 x	2.38 = .000037	1.25 = .000019
(s) Saw or grind emulsions	0.012997	x 1 x	0.565 = .007343	0.297 = .003860
(w) Miscellaneous wastewater	0.012997	x 1 x	0.656 = .008526	0.345 = .004484
			<u>0.069846</u>	0.036740
		CFW Factor	x 0.531	x 0.531
		Copper Limits	0.037	0.020

Nickel - Daily Maximum and Monthly Average Loading Limits

Subpart	M# prod/d	Units	Daily Maximum	Monthly Average
(h) Equipment cleaning	0.012997	x 1 x	0.261 = .003392	0.173 = .002249
(l) Surface treatment baths	0.000596	x 3 x	0.747 = .001335	0.494 = .000883
(m) Surface treatment rinse	0.000596	x 3 x	23.3 = .041647	15.4 = .027526
(n) Alkaline cleaning bath	0.000505	x 1 x	0.642 = .000324	0.424 = .000214
(o) Alkaline cleaning rinse	0.000505	x 1 x	15.7 = .007923	10.4 = .005248
(q) Tumbling or burnishing	0.000015	x 1 x	2.4 = .000037	1.59 = .000024
(s) Saw or grind emulsions	0.012997	x 1 x	0.57 = .007408	0.377 = .004900
(w) Miscellaneous wastewater	0.012997	x 1 x	0.663 = .008617	0.438 = .005693
			<u>0.070684</u>	<u>0.046737</u>
		CFW Factor	x 0.531	x 0.531
		Nickel Limits	0.038	0.025

Fluoride - Daily Maximum and Monthly Average Loading Limits

Subpart	M# prod/d	Units	Daily Maximum	Monthly Average
(h) Equipment cleaning	0.012997	x 1 x	8.09 = .105148	3.49 = .046660
(l) Surface treatment baths	0.000596	x 3 x	23.2 = .041468	10.3 = .018410
(m) Surface treatment rinse	0.000596	x 3 x	720 = 1.28694	320 = .571973
(n) Alkaline cleaning bath	0.000505	x 1 x	19.9 = .010042	8.82 = .004451
(o) Alkaline cleaning rinse	0.000505	x 1 x	486 = .245252	216 = .109001
(q) Tumbling or burnishing	0.000015	x 1 x	74.4 = .001142	33 = .000506
(s) Saw or grind emulsions	0.012997	x 1 x	17.7 = .230052	7.84 = .101899
(w) Miscellaneous wastewater	0.012997	x 1 x	20.6 = .267744	9.11 = .118405
			2.187788	0.971306
		CFW Factor	x 0.531	x 0.531
		Fluoride Limits	1.1627	0.5162

Molybdenum - Daily Maximum and Monthly Average Loading Limits

Subpart	M# prod/d	Units	Daily Maximum	Monthly Average
(h) Equipment cleaning	0.012997	x 1 x	0.899 = .011685	0.465 = .006044
(l) Surface treatment baths	0.000596	x 3 x	2.57 = .004594	1.33 = .002377
(m) Surface treatment rinse	0.000596	x 3 x	80 = .142993	41.4 = .073999
(n) Alkaline cleaning bath	0.000505	x 1 x	2.21 = .001115	1.14 = .000575
(o) Alkaline cleaning rinse	0.000505	x 1 x	54 = .027250	27.9 = .014079
(q) Tumbling or burnishing	0.000015	x 1 x	8.27 = .000127	4.28 = .000066
(s) Saw or grind emulsions	0.012997	x 1 x	1.97 = .025605	1.02 = .013257
(w) Miscellaneous wastewater	0.012997	x 1 x	2.28 = .029634	1.18 = .015337
			0.243002	0.125734
		CFW Factor	x 0.531	x 0.531
		Molybdenum Limits	0.1291	0.0668

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3. FINAL EFFLUENT LIMITATIONS

Effective May 1, 2007, and lasting through December 31, 2009, the quality of the effluent discharged from Location 001 shall not exceed the following effluent limitations. In addition, the discharge shall comply with 40 CFR Part 403 General Pretreatment Regulations, 40 CFR Part 471.54 Subpart E Refractory Metals Forming regulations for Existing Sources (PSES), and with all applicable regulations and standards contained in the City Code. Any single analysis and/or measurement beyond the daily maximum and/or the monthly average shall be considered a violation of the conditions of this permit.

Average Daily Flow 0.0237 MGD

POLLUTANT	DAILY MAXIMUM		MONTHLY AVERAGE ¹	
	lbs/day	TRC ²	lbs/day	TRC ²
Copper (T)	0.037	0.045	0.020	0.023
Nickel (T)	0.038	0.045	0.025	0.030
Fluoride (T)	1.163	1.395	0.516	0.619
Molybdenum (T)	0.129	0.155	0.067	0.080
Total Phosphate	Report Only		Report Only	
Cadmium	Report Only		Report Only	
Chromium	Report Only		Report Only	
Lead	Report Only		Report Only	
Silver	Report Only		Report Only	
Zinc	Report Only		Report Only	
Cyanide	Report Only		Report Only	
pH	Within the range of 5.0 to 11.0 at all times			

¹ Monthly Average discharge limitation means the highest allowable average of all daily discharges determined during the calendar month. Compliance with the monthly average effluent limitations is required regardless of the number of samples analyzed and averaged.

² Technical Review Criteria for metals means a numeric threshold of 20% above daily and/or monthly limits. The TRC limit is used to define a subcategory of SNC. A SNC violation is determined where 33 percent or more of all of the measurements taken during a six-month period equal or exceed the product of the TRC limit. (TRC = 1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH).

4. MONITORING REQUIREMENT

Monitoring is required at a monitoring flume (Location 001) located outside the facility along the south wall on the west end of the facility. The discharge shall consist of the facility process generated wastestream. At a minimum, the following parameters shall be monitored at the frequency and with the type of measurement indicated:

<u>Parameter</u>	<u>Frequency</u>	<u>Sample Type</u>
Flow, gpd	Daily/Monthly ¹	Indicate/Totalize
Copper (T)	Monthly ¹	24-hour Composite ²
Nickel (T)	Monthly ¹	24-hour Composite ²
Fluoride (T)	Monthly ¹	24-hour Composite ²
Molybdenum	Monthly ¹	24-hour Composite ²
Total Phosphate	Monthly ¹	24-hour Composite ²
Cadmium (T)	Semiannually ³	24-hour Composite ²
Chromium (T)	Semiannually ³	24-hour Composite ²
Lead (T)	Semiannually ³	24-hour Composite ²
Silver (T)	Semiannually ³	24-hour Composite ²
Zinc (T)	Semiannually ³	24-hour Composite ²
Cyanide (T)	Semiannually ³	Discrete Grab ⁴
pH	Monthly ¹	pH Grab ⁵

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- ¹ Monthly is defined as a sample collected at least once during the calendar month.
- ² 24-hour composite sample is defined as a minimum of 12 samples collected at equal time intervals over a 24-hour period and combined proportional to flow or a sample collected at frequent intervals proportional to flow over the 24-hour period.
- ³ Semiannually is defined as twice a year with one sample collected between January and June and the second sample collected between July and December.
- ⁴ Discrete grab sample is defined as a minimum of 4 representative samples collected equally over the monitoring period, each one individually preserved at the time of collection and composited for a single result or 1 representative sample collected and preserved where the permittee states that to the best of knowledge the discrete grab sample is representative of the daily operation.
- ⁵ pH grab sample is defined as an individual sample collected without regard for flow and time at a representative point in the discharge stream. A pH grab sample must be analyzed within 15 minutes of sample collection.

5. REPORTING REQUIREMENT

Kennametal is required to submit a monthly discharge monitoring report. The report shall indicate the nature and concentration of all pollutants in the effluent, which are regulated by the limits, set forth in Part I, Section A.2 of Permit 07-KMT, and include measured maximum and average daily flows. If the production data and/or flow vary more than 20% from that used in calculation of effluent standards, the Control Authority shall determine if permit limits will be modified.

6. OTHER REQUIREMENTS

Kennametal is required to provide a flow-metering device at the monitoring site. Kennametal is required to maintain and calibrate the flow metering device according to manufacturer's recommendations and maintain certification records of the calibrations.

Because Kennametal stores chemicals onsite, Kennametal developed and implemented a Slug Control Plan (SCP) for the facility. The plan was initially approved by the Control Authority and implemented according to the compliance schedule contained in permit 99-RTW. The SCP is designed to minimize any potential for spills and/or slug discharges to the waste treatment system. However, approval of this plan by the Control Authority does not relieve from its requirements to meet all applicable local, state, and federal laws and regulations. Kennametal shall assess the current SCP and submit a revised Slug Control Plan by September 2007 to the Control Authority for review and comment. The permittee must review the SCP at least annually and submit an annual SCP summary report by April 1 verifying one of the following:

- (a) The existing plan is current and needs no revision;
- (b) The existing plan is current with the following changes or revisions to the SCP; or a complete revised SCP has been submitted

Kennametal developed an ongoing comprehensive Pollution Prevention Plan designed to minimize the occurrences of interferences and pass-through by utilizing source reduction and in-process recycling measures. Kennametal must submit a summary of the pollution prevention program plan by September 2007, and subsequent information by April of each year that would verify the on-going pollution prevention performance goals are being met. Once the pollution prevention program goals have been met, the permittee is encouraged to seek continuous environmental improvements even beyond these reductions.

Kennametals Metals Summary

Month	Total Flow MG	Flow Daily MGD	Cd mg/l	Cr mg/l	Cu mg/l	Pb mg/l	Ni mg/l	Ag mg/l	Zn mg/l	Mo mg/l	F mg/l	CN mg/l	Phenol mg/l
Feb 2006	0.282242	0.009669	0.00150	0.0069	0.0400	0.0050	0.0203	0.00117	0.0447	0.0100	0.99	0.0280	
Mar 2006	0.331963	0.014082	0.00150	0.0033	0.0191	0.0011	0.0516	0.00170	0.0495	0.0100	1.17	0.0760	
Apr 2006	0.254079	0.009636	0.00045	0.0223	0.0368	0.0019	0.2000	0.00044	0.1470	0.0072	0.51	0.1180	
May 2006	0.409083	0.014929	0.00096	0.0260	0.0354	0.0029	0.0644	0.00135	0.0822	0.0060	0.79	0.1155	
Jun 2006	0.523945	0.018839	0.00032	0.0184	0.0169	0.0014	0.0044	0.00170	0.1400	0.0100	1.28	0.1040	
Jul 2006	0.693784	0.027324	0.00150	0.0051	0.0188	0.0050	0.0142	0.00170	0.0486	0.0100	1.29	0.0200	
Aug 2006	1.003255	0.027543	0.00150	0.0072	0.0469	0.0050	0.0171	0.00170	0.0570	0.0100	1.47	0.0590	
Sep 2006	0.833949	0.019577	0.00150	0.0167	0.0351	0.0050	0.0212	0.00170	0.0539	0.0100	1.27	0.2090	
Oct 2006	0.338530	0.015461	0.00150	0.0078	0.0214	0.0050	0.0251	0.00170	0.0612	0.0100	0.91	0.0200	
Nov 2006	0.285386	0.014169	0.00150	0.0028	0.0173	0.0014	0.0153	0.00170	0.0489	0.0100	0.82	0.2260	
Dec 2006	0.258438	0.009582	0.00081	0.0137	0.0312	0.0024	0.0166	0.00042	0.1020	0.0100	0.17	0.2793	
Jan 2007	0.256424	0.007829	0.00087	0.0213	0.0356	0.0055	0.0438	0.00039	0.1200	0.0050	0.75	0.0320	
Minimum	0.254079	0.007829	0.00032	0.0028	0.0169	0.0011	0.0044	0.00039	0.0447	0.0050	0.17	0.0200	
Maximum	1.003255	0.027543	0.00150	0.0260	0.0469	0.0055	0.2000	0.00170	0.1470	0.0100	1.47	0.2793	
Total	5.471078	0.189640	0.01390	0.1515	0.3545	0.0416	0.4939	0.01568	0.9550	0.1082	11.41	1.2868	
Average	0.455923	0.015803	0.00116	0.0126	0.0295	0.0035	0.0412	0.00131	0.0796	0.0090	0.95	0.1072	

Month	Total Flow MG	Flow Daily MGD	Cd lbs/day	Cr lbs/day	Cu lbs/day	Pb lbs/day	Ni lbs/day	Ag lbs/day	Zn lbs/day	Mo lbs/day	F lbs/day	CN lbs/day	Phenol lbs/day
Feb 2006	0.282242	0.009669	0.0001	0.0006	0.0032	0.0004	0.0016	0.00009	0.0036	0.0008	0.08	0.0023	
Mar 2006	0.331963	0.014082	0.0002	0.0004	0.0022	0.0001	0.0061	0.00020	0.0058	0.0012	0.14	0.0089	
Apr 2006	0.254079	0.009636	0.0000	0.0018	0.0030	0.0002	0.0161	0.00004	0.0118	0.0006	0.04	0.0095	
May 2006	0.409083	0.014929	0.0001	0.0040	0.0053	0.0002	0.0079	0.00015	0.0107	0.0005	0.06	0.0186	
Jun 2006	0.523945	0.018839	0.0001	0.0029	0.0027	0.0002	0.0007	0.00027	0.0220	0.0016	0.20	0.0163	
Jul 2006	0.693784	0.027324	0.0003	0.0012	0.0043	0.0011	0.0032	0.00039	0.0111	0.0023	0.29	0.0046	
Aug 2006	1.003255	0.027543	0.0003	0.0017	0.0108	0.0011	0.0039	0.00039	0.0131	0.0023	0.34	0.0136	
Sep 2006	0.833949	0.019577	0.0002	0.0027	0.0057	0.0008	0.0035	0.00028	0.0088	0.0016	0.21	0.0341	
Oct 2006	0.338530	0.015461	0.0002	0.0011	0.0029	0.0007	0.0034	0.00023	0.0084	0.0014	0.12	0.0027	
Nov 2006	0.285386	0.014169	0.0002	0.0003	0.0020	0.0002	0.0018	0.00020	0.0058	0.0012	0.10	0.0267	
Dec 2006	0.258438	0.009582	0.0001	0.0010	0.0022	0.0002	0.0012	0.00003	0.0073	0.0007	0.01	0.0203	
Jan 2007	0.256424	0.007829	0.0001	0.0014	0.0023	0.0004	0.0029	0.00003	0.0078	0.0003	0.05	0.0021	
Minimum	0.254079	0.007829	0.0000	0.0003	0.0020	0.0001	0.0007	0.00003	0.0036	0.0003	0.01	0.0021	
Maximum	1.003255	0.027543	0.0003	0.0040	0.0108	0.0011	0.0161	0.00039	0.0220	0.0023	0.34	0.0341	
Total	5.471078	0.189640	0.0019	0.0190	0.0467	0.0056	0.0523	0.00229	0.1163	0.0145	1.64	0.1598	
Average	0.455923	0.015803	0.0002	0.0016	0.0039	0.0005	0.0044	0.00019	0.0097	0.0012	0.14	0.0133	

A-5h

Attachment A



SUPERIOR INDUSTRIES INTERNATIONAL, INC.

1301 DIXIELAND ROAD • ROGERS, AR 72756
(479) 631-8037 • FAX (479) 636-6054

Submitted by facsimile transmission to 479-273-7627

April 14, 2008
Paul Burns
Control Authority
4300 Rainbow Rd.
Rogers, AR 72758-1440

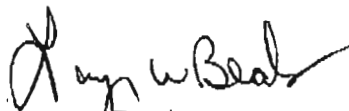
RE: Permit #07-SII, TTO Certification and DMR for Month of March

Mr. Burns:

Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for total toxic organics (TTO), I certify that to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the Control Authority.

Following is the signed Discharge Monitoring Report (DMR) and supporting documentation. This facility has permanently removed the cyanide process.

Sincerely,


Larry Beals
General Manager

Attachments

COPY

ROGERS INDUSTRIAL PRETREATMENT DISCHARGE MONITORING REPORT (DMR)

INDUSTRY: SUPERIOR INDUSTRIES INTERNATIONAL, INC.
ADDRESS: 1301 North Dixieland Road
 Rogers, Arkansas 72766

CONTACT: Bob Laird, Environmental Technician

PERMIT NUMBER: 07-SII
LOCATION: L001
SAMPLING PERIOD: 03/1-31/2008
TOTAL FLOW (MGD): 1.877070

PROCESS DAYS: 31

PARAMETER	DAILY MAXIMUM LIMIT mg/L	Sample Date		Sample Date		MONTHLY AVERAGE LIMITS mg/L	MONTHLY AVERAGE mg/L	REPORTED MONTHLY AVERAGE lbs/day	NO. of VIO.
		mg/L	lbs/day	mg/L	lbs/day				
Phosphorus	Report Only	10.80	6.0366			Report Only	10.80	6.0366	
Aluminum	Report Only	8.800	4.9187			Report Only	8.800	4.9187	
Cadmium	0.11	< 0.0012	< 0.0007			0.07	< 0.0012	< 0.0007	0
Chromium	2.77	0.0160	0.0089			1.71	0.0160	0.0089	0
Copper	3.38	0.026	0.0147			2.07	0.026	0.0147	0
Lead	0.69	0.0074	0.0041			0.43	0.0074	0.0041	0
Nickel	3.98	0.0064	0.0036			2.38	0.0064	0.0036	0
Silver	0.43	< 0.0009	< 0.0005			0.24	< 0.0009	< 0.0005	0
Zinc	2.61	0.0605	0.0338			1.48	0.0605	0.0338	0
Cyanide	1.20	< 0.0100	< 0.0056			0.65	< 0.0100	< 0.0056	0
TTO	Report Only					Report Only			
pH units	5.0 - 11.0	5.95	7.79			MIN/MAX	5.95	7.79	
Flow, MGD		0.067020				Average Daily	0.054099		

REMARKS:

I certify under penalty of law that this document and all attachments were prepared under my 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 fines and imprisonment for knowing violations.

Name / Title of Authorized
 Larry Beals, General Manager

Larry Beals
 Signature
 4/15/08
 Date

479-273-7378

POLLUTION CONTROL FACILITY

Rogers, Arkansas

A-66

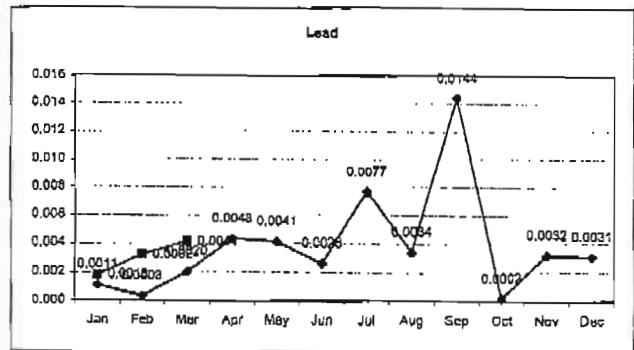
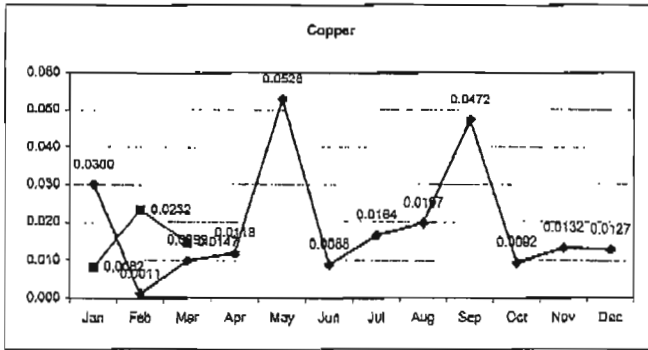
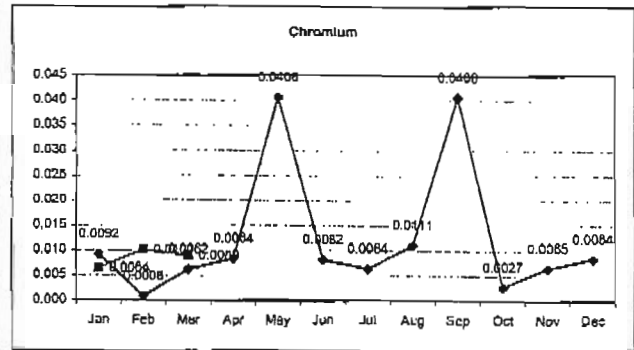
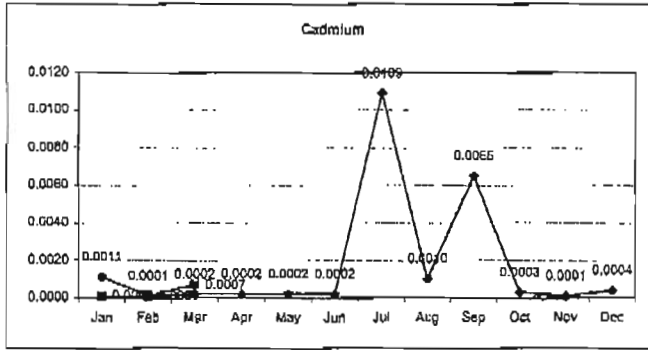
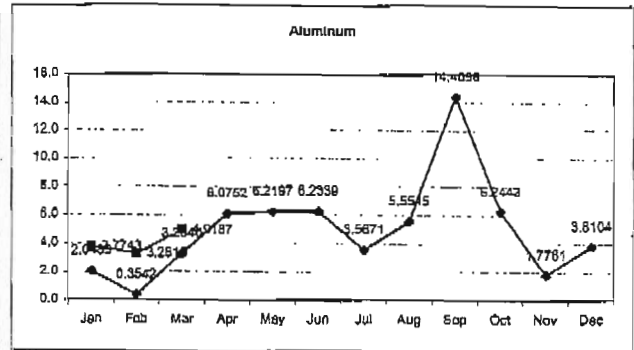
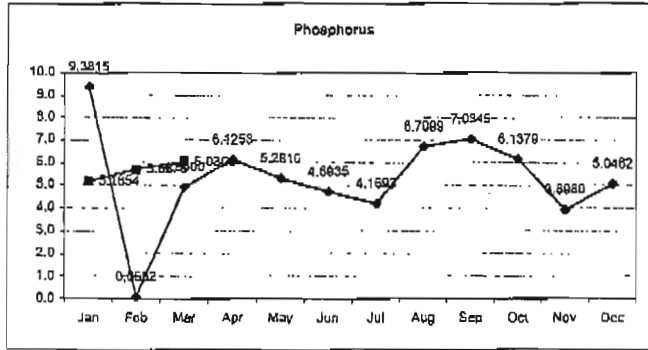
REC'D 4/15/08 by RNB

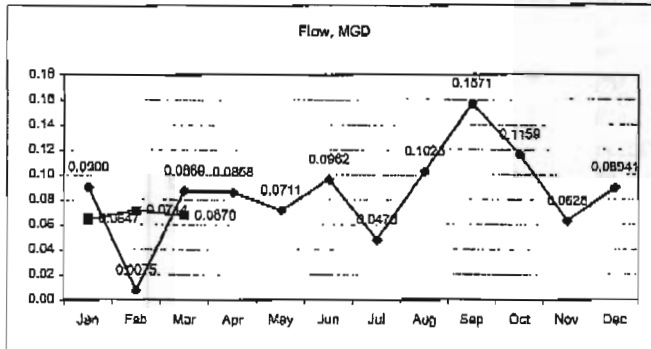
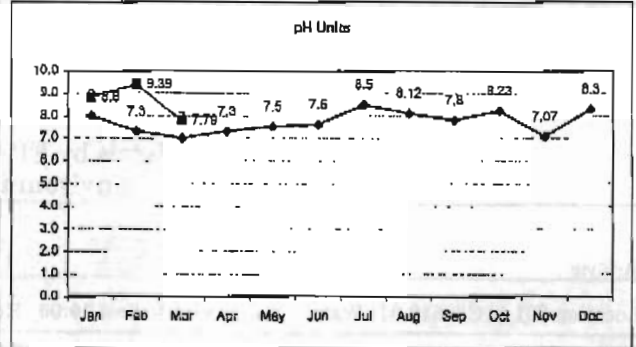
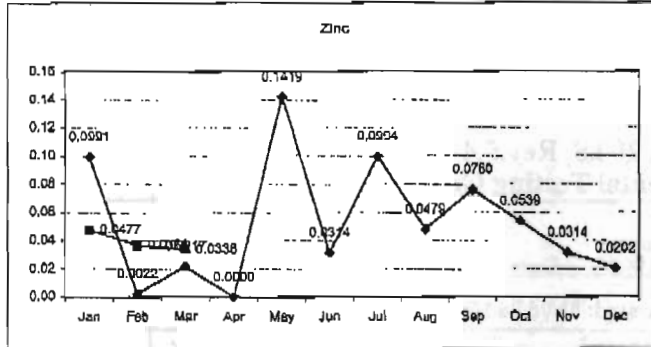
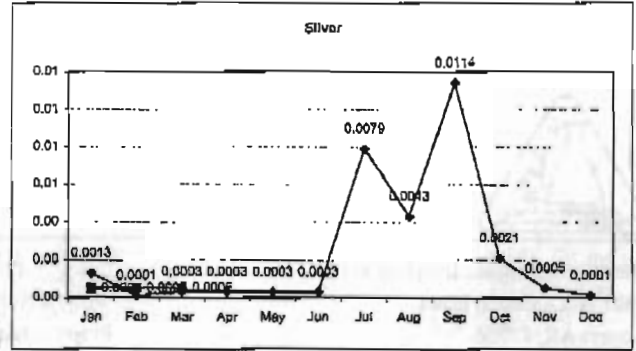
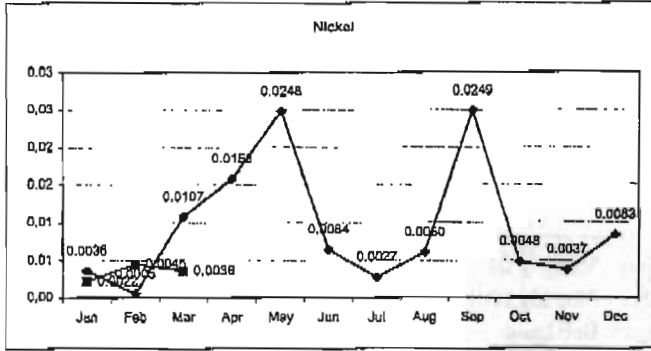
ROGERS INDUSTRIAL PRETREATMENT DISCHARGE MONITORING REPORT (DMR)

2008 REPORTED
MONTHLY AVERAGE
lbs/day

PARAMETER	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
'08 Phosphorus	5.1654	5.6676	6.0366									
'08 Aluminum	3.7743	3.2815	4.8167									
'08 Cadmium	0.0001	0.0001	0.0007									
'08 Chromium	0.0084	0.0101	0.0089									
'08 Copper	0.0082	0.0232	0.0147									
'08 Lead	0.0018	0.0032	0.0041									
'08 Nickel	0.0022	0.0045	0.0036									
'08 Silver	0.0005	0.0005	0.0005									
'08 Zinc	0.0477	0.0368	0.0338									
'08 Cyanide			0.0056									
'08 TTO												
'08 pH units	8.8	9.39	7.79									
'08 Flow, MGD	0.0647	0.0714	0.0670									

COBY







1702 East Central Avenue
 Bentonville, AR 7271
 479-271-7996 phone
 479-271-8394 fax

Superior Industries, Inc.(Rogers)
 1301 N. Dixieland Road
 Rogers AR, 72756

Project: Monthly DMR
 Project Number: Monthly DMR
 Project Manager: Bob Laird

Reported:
 03/12/08 16:44

**Metals by EPA 200.8, Rev.5.4 ICP/MS
 Environmental Testing Group**

Analyte	Result	Reporting Limit	Detection Limit	Units	Dilution	Batch	Analyzed	Method	Notes
Location 001 (AC80610-01) Water Sampled: 03/05/08 10:00 Received: 03/06/08 16:33									
Silver	ND	0.00250	0.000868	mg/L	10	A8C1003	3/10/08 16:26	EPA 200.8	
Aluminum	8.80	8.00	5.00	"	1000	"	3/10/08 16:26	"	
Cadmium	ND	0.00600	0.00120	"	10	"	3/10/08 16:26	"	
Chromium	0.0160	0.00100	0.000200	"	"	"	3/10/08 16:26	"	
Copper	0.0263	0.00782	0.00156	"	"	"	3/10/08 16:26	"	
Nickel	0.00640	0.00102	0.000256	"	"	"	3/10/08 16:26	"	
Lead	0.00740	0.000500	0.000500	"	"	"	3/10/08 16:26	"	
Zinc	0.0605	0.0109	0.00109	"	"	"	3/10/08 16:26	"	

A-6e



1702 East Central Avenue
Bentonville, AR 7271
479-271-7996 phone
479-271-8394 fax

Superior Industries, Inc.(Rogers)
1301 N. Dixieland Road
Rogers AR, 72756

Project: Monthly DMR
Project Number: Monthly DMR
Project Manager: Bob Laird

Reported:
03/12/08 16:44

**Chemistry Parameters by APHA/EPA Methods
Environmental Testing Group**

Analyte	Result	Reporting Limit	Detection Limit	Units	Dilution	Batch	Analyzed	Method	Notes
Location 001 (AC80610-01) Water Sampled: 03/05/08 10:00 Received: 03/06/08 16:33									
Phosphorus, Total as P	10.8	0.0200	0.0100	mg/L	1	A8C0701	3/7/08 15:50	EPA 365.1	
Location 001 Grab (AC80610-02) Water Sampled: 03/06/08 11:00 Received: 03/06/08 16:33									
Cyanide (total)	ND	0.0200	0.0100	mg/L	1	A8C1011	3/12/08 9:30	Cyanide, Total-4500-CN C&E	

David D. Amico

David D'Amico, Laboratory Director



Rogers Water Utilities

Attachment A-7

ROGERS POLLUTION CONTROL FACILITY

"SERVING ROGERS - PROTECTING THE ENVIRONMENT"

August 29, 2007

Mr. Larry Beals
General Manager
Superior Industries
1301 N. Dixieland Road
Rogers, AR 72756

Re: Pretreatment Compliance Inspection

Dear Mr. Beals:

A pretreatment compliance inspection (PCI) was performed at Superior on August 27, 2007. Luanne Diffin and Robert Winnes of the City of Rogers conducted the inspection. Nick Martini and Bob Laird represented Superior Industries.

The inspection consisted of a review of the facility, monitoring records, observation of processes, survey of chemical storage practices. A summary of the findings follows:

- *Superior Industries is presently compliant with permit limit and reporting requirements.*
- *The inspection included observation of all process operation areas, pretreatment operations and outside grounds and drainage areas. During the inspection all required records and plans were reviewed.*
- *Superior completed the change over to helium leak testing (VDH) since the last inspection.*
- *At the time of the inspection the chiller was down and a temporary unit was on-site. Superior had taken action to repair and continue permanent operations.*
- *Superior has completed testing and anticipates approval to use a non-phosphate soap for a portion of their products. The change will affect a majority of Superior's phosphate load to the system.*
- *The truck loading dock on east side was filled with rainwater due to a blocked drain possibly due to lack of good housekeeping. The condition of this rainwater is a concern since this dock drains to the clarifier and sanitary sewer. This dock drains to the clarifier. Superior will need to plug this line, discontinue discharging stormwater to the sanitary sewer and find alternative means for draining the truck dock area. Discharge from this site to the sanitary sewer had been a condition of minimizing the volume of rainwater and maintaining a clean condition.*
- *All observed operations were operable at the time of inspection.*
- *Superior Industries personnel were cooperative, responsive and informative.*
- *Superior's 2006 pollution prevention actions included: Landfill waste reduction by ed by 371%; natural gas was reduced by 15.4%; electricity was reduced by 13%; and water was not reduced by the 7.3% projection. See the attached EMS summary sheet.*

Mr. Beals
August 29, 2007
Page 2

- *Housekeeping continues to be an ongoing concern. Potential environmental spills as well as health and safety issues are reflected in lack of company-wide housekeeping. An open container of grease, located adjacent to the east truck dock (mentioned above) presented contamination and spill concerns.*
- *Lack of secondary containment of chemicals throughout the facility.*
- *Superior has had difficulty submitting accurate and complete monthly DMR's.*

Based on the PCI observations, Superior is required to discontinue all discharges from the truck dock to the sanitary sewer system. Discharge from this location to the sanitary sewer had been a condition of Superior's commitment to minimize the volume of rainwater, maintain a clean area, and discharge only process generated waste. Superior must plug this drain line and discontinue discharging stormwater and truck wash water to the sanitary sewer. An alternate means of draining the truck dock must be determined and presented to the Control Authority. Superior is required to submit a plan to eliminate this discharge of all stormwater and wash water for approval within the next 90 days.

Superior has been inconsistent in submitting monthly DMR's. Superior is required to establish a review system that will ensure accurate and complete reports are submitted to the Control Authority the first time.

It is highly recommended that Superior address current housekeeping practice in all areas throughout the facility; process and storage.

It is recommended that Superior ensure that all chemicals are properly labeled and on secondary containment. There are numerous locations throughout the facility where chemicals are stored without regard to secondary containment.

If you have any questions regarding this report or details regarding the recommended actions, please contact me at 479-273-7378 x109.

Sincerely,



S. Luanne Diffin
Environmental Services Coordinator

INDUSTRIAL INSPECTION REPORT
CITY OF ROGERS, ARKANSAS

COPY

***** GENERAL INSPECTION INFORMATION *****

Industry name: *Superior Industries International, Inc.*

FOR ADEE A. GILLIAM

Address: *1301 North Dixieland Road, Rogers, Arkansas 72756*

Phone number: *(479) 631-8037*

Years at present location: *18 (1988)*

Inspection type: *Pretreatment Compliance Inspection – unannounced*

Inspection date: *8/27/07*

Time of inspection: *0915-1145 hrs*

Industry type / category: *Metal Finishing*

SIC Code(s): *3365* NAIC Code(s): *331521*

Nature of operation: *Cast aluminum automobile wheels*

Number of employees: *600*

Work hrs./day: *24*

Work days/week: *5-6*

IWD permit number: *07-SII*

Expiration date: *12/31/09*

Inspectors: *S. Luanne Diffin & Bob Winnes*

Industry representatives: *Nick Martini and Bob Laird*

***** RECORD KEEPING INFORMATION *****

Does IU have copy of permit on file? *Yes*

Does IU have copies of DMR's on file? *Yes*

Reviewed 05/06 & 2/04

Has IU had any problems filling out DMR? *Yes, consistently*

Does IU have a copy of SCP, P² on file? *Yes*

SCP- 3/07; P2-3/07

Are all required files / records maintained for three years? *Yes*

Are all records well organized and readily available? *Yes*

***** GENERAL FACILITY INFORMATION *****

Did the previous inspection identify areas which the IU was required to correct? *No* What areas were identified?

There were no deficiencies identified but there were recommendations during the last inspection. None of the recommendations were addressed prior to this inspection.

What progress has the IU made in correcting the identified deficiencies?

There were no actions necessary, as Superior had no deficiencies.

It was recommended that Superior address housekeeping in all areas throughout the facility – process and storage.

It was also recommended that Superior ensure that all chemicals are properly labeled and on secondary containment.

Superior was advised to cross train all needed personnel in order to ensure consistent compliance with permit limits and a clear understanding of monitoring and reporting requirements.

Are there any planned changes to the facility? *Yes.*

Superior finished converting the water leak testing process to a helium leak testing operation. Superior added 4 mirror finish area for Toyota wheels.

Has the IU complied with IWD permit requirements? *Yes*

A-7c

INDUSTRIAL INSPECTION REPORT

INDUSTRY NAME: Superior Industries

PAGE: 2 OF 9

***** GENERAL FACILITY INFORMATION *****

Raw materials used:

Aluminum, additive alloys, powder paint, liquid and clearcoat paints, water based paints.

Process description:

Manufactures aluminum wheels for the automobile industry. Aluminum ingots are melted and cast in low-pressure permanent casting units to form wheel castings. Wheel castings are heat treated, washed, chromated, painted and machined prior to shipping to customer. The wheels are fettled where the center hole is cut out and shot peened.

Products Produced:

Cast aluminum automobile wheels. Approximately 5,800/day - 1,358,151 wheels /year to date – approximately 1,810,868 wheels produced/2007year. Superior has poured 23, 917, 791 pounds of metal to date (8/12 or 2/3 of the way through the year) .

Process areas:

Aluminum ingots are melted in one of four furnaces that supply molten aluminum to 40 low-pressure casting machines. After the wheels have been casted, they go on a conveyor system to a cooling tank, sort area, time area, and then fluoroscoped. Heat treatment is at station #4. Any wheels that do not pass QC are sent to the machine shop prior to painting (station #8). After drying, wheels are sent to packaging. Scrap aluminum is melted again into ingots for recycling.

The wash conveyor returns the coolant and eliminates discharge to the sanitary system. A centrifuge provides a closed loop system; separating grease from dirt.

NE Plant. Mold shop attached to the NE corner of the existing facility. The sand blast room is located north of the chill tower that cools the HVAC water. The caustic tank, rinse tank and pit are located north of the HVAC room.

SE Plant. Casting deck with 10 casting machines.

Central Plant. Heat treat ovens. Chiller is located on south side of building.
4 mirror machines to manufacture Toyota wheels and leak test with helium processes (VDH)

West Plant. Warehouse area running full length of the building and extending 100' wide.

Water source-% City: 100% Other:

Water usage-gallons:

--- Sanitary:	_____	15,000 gpd
--- Process:	_____	50,000 gpd
--- Noncontact cooling water:	_____	25,000 gpd
--- Contact cooling water:	_____	
--- Equipment / facility washdown:	_____	
--- Boiler / tower blowdown:	_____	2,000 gpd
--- Evaporation:	_____	
--- Other:	_____	
--- Other:	_____	

Total flow to collection system: 92,000 gpd

A-7d

INDUSTRIAL INSPECTION REPORT

INDUSTRY NAME: Superior Industries

PAGE: 3 OF 9

***** GENERAL FACILITY INFORMATION *****

Process chemicals and wastestreams:

All process chemicals are contained within the paint room, and mold cleaning area. Paint room: solvents, water based paints, acids (to back flush DI units), and caustics (to back flush DI units) stored for use in the process. Mold cleaning area: bulk tanks for cleaning molds; muriatic acid and caustic soda are both used for cleaning. The area is diked with no drains to the sanitary sewer. All process water is treated and discharged into the sanitary sewer system after it passes through the clarification system. (See pages 6 & 7 for details).

Wastestreams include: blow down from chillers that cool process water in casting process; leak testers which discharge periodically to clarifiers; mold shop caustic tank which discharges to clarifier after it is neutralized (very infrequently); paint room rinse overflow water and wash/rinse tanks that have been neutralized and are drained to clarifier; water from alodine DI units that are discharge; and truck well discharges to clarifier.

Chemical storage area:

All chemicals are stored in the paint room, chemical lab, or tool crib. The paint room contains acids (nitric, hydrochloric), caustic soda, and paints. The chemical lab contains small amounts of in-use chemicals for testing. The tool crib contains MEK (1-gallon) and a non-hazardous chemical solvent.

Waste storage area:

Waste oil storage area is outside along east wall. The waste oil storage area is covered and bermed.

Wastestream to surface / groundwater: No

Permit number: General storm water permit: ARR00B108

Expiration date: 3/31/09

Are there any floor drains in or around the waste and chemical storage areas? Yes If yes, have they been properly sealed to prevent an illegal discharge of hazardous waste? Explain:

The chemicals and/or solutions are enclosed in a bermed area everywhere there are open floor drains.

INDUSTRIAL INSPECTION REPORT

INDUSTRY NAME: Superior Industries

PAGE: 4 OF 9

***** MONITORING INFORMATION *****

Monitoring facility:

The monitoring facility is located in the southwest corner of the mold shop bordering the south wall. The monitoring equipment consists of an ISCO ultra sonic flow meter - Model 4210, and an ISCO automatic sampler - Model 2910. Superior conducts month compliance monitoring with daily pH and flow readings.

Superior personnel were certified to check flow meter calibration. Superior has until 2/07 to calibrate flow meter. Superior is considering retraining new personnel to calibrate the flow meter. All records were in order.

Comments:

Superior calibrated the flow meter in-house with trained/certified personnel. Flow meter was last calibrated 1/2/06. Superior has records of calibrations.

Sampling techniques: *Samples are 24 hr flow proportional composite*

Preservation techniques: *Superior Industries follows 40 CFR preservation procedures - acid fix upon arrival at the laboratory*

Do sampling and analytical procedures conform to EPA methods? *Yes as per 40 CFR metals preservation*

Are chain of custody procedures employed? *Yes*

Contract laboratory information:

Name: *Environmental Testing Group, Inc.*
Address: *1702 East Central, Bentonville, AR 72712*
Telephone number: *479-271-7996*
Contact: *Malcolm Howell - Lab Manager*
Parameters: *Cd, Cr, Cu, Zn, Ag, Ni, Pb, Al, Phos, pH - monthly; TTO - as needed*
Is laboratory certified? *Yes*

Permit violations (past twelve months):

Superior Industries had no violations over the past 12 months. Last violation was 10/05 for late DMR.

Is control authority notified of all violations within twenty-four hours? *Yes*

At what frequency does industry sample? *Yearly TTO Monthly metals Daily pH*

Has industry experienced any upset conditions since last inspection? *No.* **Was Control Authority notified?** *NA*

If yes, give a brief description:

Is pH testing done in-house? *Yes.* **If no, please name contract laboratory:**

If pH testing is done in-house, does IU understand proper technique for taking pH readings? *Yes.* **What method is used?**
Superior Industries follows 40 CFR approved method; using a 2 point calibration. Superior Industries uses fresh buffers, and a 3-point pH span range for calibration. Superior was sent a revised pH calibration/collection/reporting sheet.

A-7f

INDUSTRIAL INSPECTION REPORT

INDUSTRY NAME: Superior Industries

PAGE: 5 of 9

***** ENVIRONMENTAL MANAGEMENT INFORMATION *****

Has this facility experienced a spill or slug discharge into the sanitary sewer or storm drain? *No*
If so, describe the incident (when, what was spilled, amount, cause of spill/slug, actions taken):

Does this facility have a Slug Control Plan? *Yes*

Date last reviewed by IU: *3/29/07*

Date last revised by the IU: *3/29/07*

Does this facility have a Pollution Prevention Plan? *Yes*

Date last reviewed by IU: *3/29/07*

Date last revised by the IU: *3/07*

What is the primary concern at this facility?

This facility has potential to discharge a high metals concentration and sludge into the system.

Describe the best management practices this facility uses to prevent or reduce pollution:

Superior Industries used secondary containment for all chemicals (process and pretreatment). Essential personnel are cross-trained on process operations and are trained to respond to spills and upsets.

Does this facility have an Environmental Management System (EMS)? *Yes*

Date last reviewed by IU: *unknown*

Date last revised by IU: *unknown*

Describe the environmental performance goals of this facility:

See attached summary

INDUSTRIAL INSPECTION REPORT

INDUSTRY NAME: Superior Industries

PAGE: 6 OF 9.

***** PRETREATMENT INFORMATION *****

Pretreatment process:

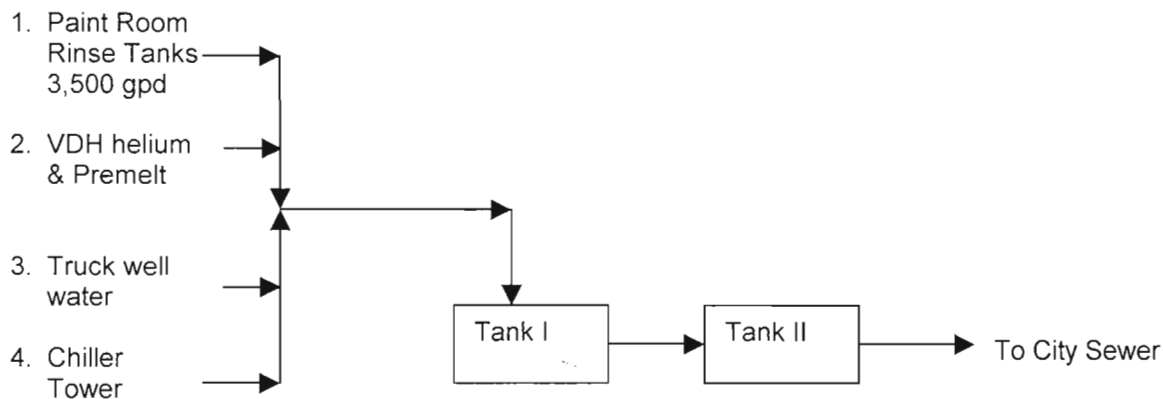
Superior Industries does not have a pretreatment operation following production. Ever since Superior stopped using the chromium and needed the chromium destruct system. Superior has not needed to add additional pretreatment processes in order to meet permit.

There are 4 main process areas that discharge wastewater; Paint Room, VDH (helium leak test water) drains to Premelt, Chiller Tower water and truck well water. A diagram of the water sources is below. Water is discharged from these operations continuously. All wastestreams run into the 2 stage underground clarifier for further settling. The clarifier receives wastewater and allows additional settling. The effluent from the clarifier then goes through the monitoring site before entering the sanitary system. (See bottom of this page).

Have there been any changes to the pretreatment process since the last inspection? Yes If yes, explain:
Removed all pretreatment tanks - no more chromium destruct system.

Comments:

Diagram of Process waste streams to sanitary sewer:



INDUSTRIAL INSPECTION REPORT

INDUSTRY NAME: Superior Industries

PAGE: 7 OF 9

***** HAZARDOUS WASTE INFORMATION *****

Does IU generate hazardous waste? Yes

EPA identification number of hazardous waste generator: ARD982561722

Does IU comply with RCRA requirements? Yes

RCRA transporter:

Name: Perma Fix Treatment Services
Address: 2700 South 25th West Avenue, Tulsa, Oklahoma 74107
Phone: 800-582-9595
EPA number: OKD000402396

Disposal facility:

Name: Perma Fix Treatment Services
Address: same as above
Phone:
EPA number:

Waste description: Name, amount, frequency of disposal.

Flammable waste paint – Class 3
Waste corrosive liquids – sodium hydroxide

Date of last disposal: 7/2/07 See attached manifest

Does IU have copies of signed manifest? Yes

Are all hazardous waste drums properly labeled? Yes

Comments:

Superior will be recycling all foam, plastics, buckets, etc through Mark's Recycling as part of an EMS measure
Superior currently sends all waste computers to schools and pallets to J&R pallets for recycling

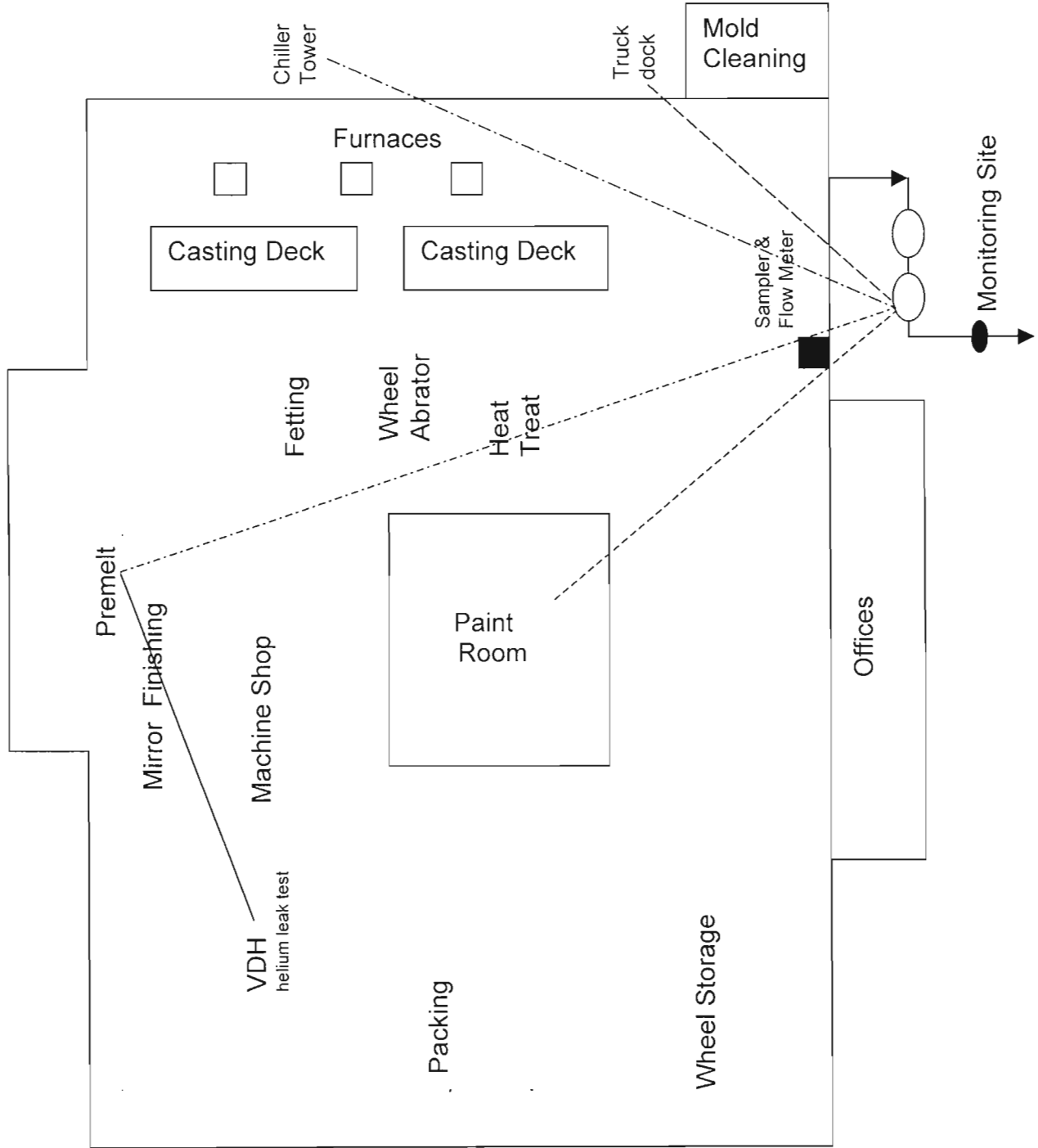
INDUSTRIAL INSPECTION REPORT

INDUSTRY NAME: Superior Industries

PAGE: 8 OF 9

***** DRAWINGS AND DIAGRAMS *****

Superior Industries



E
N - S
W

A-7j

INDUSTRIAL INSPECTION REPORT

INDUSTRY NAME: Superior Industries

PAGE: 9 OF 9

***** INSPECTION ANALYSIS AND SUMMARY *****

Has IU been given any new information pertaining to pretreatment by the control authority? Yes. If yes, give a summary.

Superior was informed of changes in grab sample collection for pH and Cyanide. Compliance monitoring during the inspection helped to "fine tune" the sampling method.

Inspection summary:

Superior Industries is presently compliant with permit limit and reporting requirements.

The inspection included observation of all process operation areas, pretreatment operations and outside grounds and drainage areas. During the inspection all required records and plans were reviewed.

Superior completed the change over to helium leak testing (VDH) since the last inspection.

At the time of the inspection the chiller was down and a temporary unit was on-site. Superior had taken action to repair and continue permanent operations.

Superior has completed testing and anticipates approval to use a non-phosphate soap for a portion of their products. The change will affect a majority of Superior's phosphate load to the system.

The truck loading dock on east side was filled with rainwater due to a blocked drain possibly due to lack of good housekeeping. The condition of this rainwater is a concern since this dock drains to the clarifier and sanitary sewer. This dock drains to the clarifier. Superior will need to plug this line, discontinue discharging stormwater to the sanitary sewer and find alternative means for draining the truck dock area. Discharge from this site to the sanitary sewer had been a condition of minimizing the volume of rainwater and maintaining a clean condition.

All observed operations were operable.

Superior Industries personnel were cooperative, responsive and informative.

Superior's 2006 pollution prevention actions included:

Landfill waste reduction by ed by 371%; natural gas was reduced by 15.4%; electricity was reduced by 13%; and water was not reduced by the 7.3% projection. See the attached EMS summary sheet.

Housekeeping continues to be an ongoing concern. Potential environmental spills as well as health and safety issues are reflected in lack of company-wide housekeeping. An open container of grease, located adjacent to the east truck dock (mentioned above) presented contamination and spill concerns.

Lack of secondary containment of chemicals throughout the facility.

Superior has had difficulty submitting accurate and complete monthly DMR's.

Recommended action(s):

Superior is required to discontinue all discharges from the east truck dock to the sanitary sewer system. Superior is required to submit a plan to eliminate this discharge of all stormwater and wash water for approval within the next 90 days.

Superior has been inconsistent in submitting monthly DMR's. Superior is required to establish a review system prior to submittal to ensure accurate and complete reports are submitted the first time.

It is highly recommended that Superior address housekeeping in all areas throughout the facility – process and storage. It is recommended that Superior ensure that all chemicals are properly labeled and on secondary containment.

Report completed by:

Date:

AJK

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number ARD982561722	2. Page 1 of 1	3. Emergency Response Phone 918-521-5160	4. Manifest Tracking Number 000657529 FLE
---	---	--------------------------	--	---

5. Generator's Name and Mailing Address SUPERIOR INDUSTRIES 1301 NORTH DIXIELAND ROGERS, AR 72756	Generator's Site Address (if different than mailing address) SUPERIOR INDUSTRIES 1301 NORTH DIXIELAND ROGERS, AR 72756	Disposal Plan # <input type="checkbox"/>
---	--	---

6. Transporter 1 Company Name PERMA FIX TREATMENT SERVICES	U.S. EPA ID Number OKD000402396	818 582-9585
--	---	--------------

7. Transporter 2 Company Name	U.S. EPA ID Number
-------------------------------	--------------------

8. Designated Facility Name and Site Address PERMA FIX TREATMENT SERVICE! 2700 SOUTH 25TH WEST AVE TULSA, OK 74107	U.S. EPA ID Number OKD000402396
--	---

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
		No.	Type					
X	1. Waste Sodium hydroxide solution, 8, UN1824, II RQ	1	T	2455	G	D002		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information 26350 LBS	1. ERG 154	SO #: 6794280	Ref #: SUP-ROE
9a.1: AT55600	2. ERG	Doc #: DT113882	
9a.2:	3. ERG	Notes (If Any): AT32398	
9a.3:	4. ERG		
9a.4:			

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offoror's Printed/Typed Name Bob Lued	Signature <i>Bob Lued</i>	Month 7	Day 2	Year 07
---	------------------------------	-------------------	-----------------	-------------------

16. International Shipments	<input type="checkbox"/> Import to U.S.	<input type="checkbox"/> Export from U.S.	Port of entry/exit:
-----------------------------	---	---	---------------------

17. Transporter Acknowledgment of Receipt of Materials				
Transporter 1 Printed/Typed Name 1706 YORK	Signature <i>Bob York</i>	Month 7	Day 2	Year 10
Transporter 2 Printed/Typed Name	Signature	Month	Day	Year

18. Discrepancy				
18a. Discrepancy Indication Space	<input type="checkbox"/> Quantity	<input type="checkbox"/> Type	<input type="checkbox"/> Residue	<input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection
Manifest Reference Number:				

18b. Alternate Facility (or Generator)	U.S. EPA ID Number
Facility's Phone:	

18c. Signature of Alternate Facility (or Generator)	Month Day Year
---	----------------

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)			
1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a				
Printed/Typed Name KORRI DELANEY	Signature <i>Korri Delaney</i>	Month 7	Day 2	Year 07



Larry Beals Management Representative

2006 EMS Objectives & Targets

	<u>Goal</u>	<u>Actual</u>	<u>Action plans</u>
Landfill waste reduction	2% reduction vs. 2005	371.33%	Recycle wood pallets, plastic buckets, cardboard, paper plastic bottles, aluminum cans, toner cartridges, shot, aerosol cans, TPMS banding, fluorescent light bulbs. Wood pallets & foam were big hitters in 2006, we now use a local recycling vendor for these items
Natural Gas reduction	4.5% reduction in usage	15.43%	Shut down HT burners on weekends, new ladle heaters, new MF door opener, pre-heater for T-Bars, plant scrap reduction
Electricity reduction	6.8% reduction in usage	13.17%	Motion detectors installed in offices, power down tools in Machine Shop on weekends, increase C/C line speed, plant scrap reduction
Water reduction	7.3% reduction in usage	-0.53%	Filtration on HT overflow, re-plumb Paint Room, diversion of 4707 to 2218 rinse, diversion of reject from Casting R/O into quench tank for refill, plant scrap reduction. It takes 3-4 gallons of water to make 1 gallon of RO water

2007 EMS Objectives & Targets

	<u>Goal</u>		
Landfill waste reduction	1%		Solid Waste Landfill awareness, added additional recycle containers on Casting decks & smoking areas
Natural Gas reduction	5%		Rebuild #1 Melt Furnace with efficient burners & insulation, Scrap reduction
Electricity reduction	2%		Scrap reduction, new machines, repair air leaks in a timely fashion
Water reduction	1.50%		Reduce usage of water leak testers & scrap reduction
Phosphate reduction	TBD		Investigate sources & areas of improvement



SUPERIOR INDUSTRIES INTERNATIONAL, INC.

ROGERS PLANT

1301 N. DIXIELAND ROAD • ROGERS, AR 72756

(479) 631-8037 • FAX (479) 636-6054

September 21, 2007

S. Luanne Diffin
Environmental Services Coordinator
Rogers Pollution Control

Reference: Pretreatment Compliance Inspection on August 27, 2007

Dear Luanne,

This is to confirm our receipt of your letter of findings and recommendations as a result of your inspection of our facility. We have commenced implementation of some items noted, others are under review.

We expect to provide you with a formal response within the time frame you requested, but will also keep you verbally informed of our progress.

Please feel free to contact us with any questions.

Sincerely,

Larry W. Beals
General Manager, Rogers Plant
Corporate Director of V&E

SOP for Checking DMRs

1. Once the DMR is received, initial and date its receipt, in ink, at the bottom right of the DMR.
2. Enter the date of receipt of each industry's DMR into both the electronic and hard copy of the IU Report Status logs.
3. Verify that all required parameters are being monitored (by use of the permit or by comparing with the Industrial User Permitted Parameter Monitoring Frequency sheet).
4. Verify that the current DMR form is being used by the industry (using the permit number).
5. Verify that the dates of sampling and the analytical test results for that day match the information on the DMR.
6. Verify that all analytical data on the DMR is the same as reported by the contract laboratory.
7. Verify that the units of measure (mg/L, μ /L) that are being reported by the contract laboratory are the same as those being reported on the DMR.
8. Verify that the proper formula is being used when calculating the loading.
Formula: flow for day sampled (in million gallons per day) X 8.345 (constant) X lab results (mg/L) = lb/day.
9. Verify that the monthly averages are calculated correctly. If the industry sampled only once, those numbers are the monthly average. If the industry sampled more than once during the month, then the monthly average is a total of all results for a given parameter divided by the number of times sampled.
10. Monthly average for flow is determined by taking the total flow for the month and dividing by the total number of process days.
11. Verify that the DMR is signed and dated by the authorized person.
12. On the pH DMR form, verify that the proper buffers are being used to determine pH levels. The results must be within the range of the buffers. Example: if the result is 9.2 then 7.0 and 10.0 buffers are acceptable. However, 4.0 and 7.0 buffers are not.
13. On the pH DMR form, verify that the time between collection of samples and the analyses for pH does not exceed 15 minutes.
14. When there is a violation (daily/monthly concentration exceedance and/or daily/monthly loading exceedance) check also for a TRC (Technical Review Criteria) violation. TRC for CBOD₅, TSS & O/G is 1.4 times the daily/ monthly maximum limits; for metals and all other parameters except pH it is 1.2 times the daily/monthly maximum limits.
15. Once the DMR has been completely checked, enter the total flow, daily flow, pH results and the analytical data into the OPS 32 program. Hit the calculate button and compare the loading results from the OPS 32 with those obtained on the DMR.
16. For each industry, record any errors found during the review of the DMR into the DMR Errors log.
17. Glad manufacturing requires confirmation of receipt of their monthly DMR therefore; it is required to send an e-mail to Mike Watkins (mike.watkins@clorox.com) confirming receipt of Glad's monthly DMR.

18. When conducting CA (Control Authority) monitoring, always average the CA sampling results with the industry sampling results for the month being monitored to determine if there are any violations for that month.
19. For each industry, enter the daily flow, pH results, and the analytical data from the CA monitoring into the OPS 32 program. Hit the calculate button to obtain the loading values.
20. For each industry, enter the data obtained from the CA monitoring into the Analytical Results; SIU Analytical Data folder found in the IPT files.
21. Violations are as follows:
 - a. Daily maximum limit: a result that exceeds the daily maximum limit listed.
 - b. Monthly maximum limit: a result that exceeds the monthly average limit listed.
 - c. TRC daily or monthly limit: any result that exceeds the TRC limit for that particular parameter.
 - d. SNC daily or monthly limits: if 66% or more of all the measurements taken during a six month period exceed the same daily maximum limit or the same monthly average limit and/or if 33% or more of all of the measurements taken during a six month period exceed the same TRC daily maximum limit or the same TRC monthly average limit.

Pollution Prevention Plan

COPY

Superior Industries International, Intl.' Inc.
Rogers Plant

Rogers Water Utilities
Permit No.:07-SII

DOCUMENT
RELEASE *mom*
3/31/08

CONTROLLED
DOCUMENT

Approved by: *Larry Beals*
Larry Beals, General Manager

Updated February 2008

A. POLICY STATEMENT OF COMMITMENT TO POLLUTION PREVENTION

ISO14000



ENVIRONMENTAL POLICY

Superior Industries' Environmental Management System (EMS) is built upon the "Circle of Commitment". Our EMS is committed to continuous improvement, pollution prevention and compliance to all relevant federal, state and local environmental regulations, legislation and other requirements to which the organization subscribes, as applicable. The management system includes a framework, by which we can set forth and review our environmental targets and goals. Our company will operate in a manner, which is clean and safe, while showing consideration for the environment and our employees' working conditions. Superior Industries believes that a sound and disciplined EMS will strengthen our competitive edge in both the community we serve and the global marketplace we share.

B. GOALS & PERFORMANCE

2007EMS Objectives & Targets

	<u>Goal</u>	<u>Actual</u>	
Landfill waste reduction	1% reduction or .000218 Tons/Wheel	10% increase vs. 2006 or .000271 Tons/Wheel	We missed our goal for reduction compared to 2006 due to demolition & repair work on two furnaces & weekend production requirements.
Natural Gas reduction	5% reduction / .185 MCF/Wheel	0.54% increase or .196MCF/Wheel	We missed our goal for reduction compared to 2006 due to our weekend production requirements and a higher than planned scrap rate.
Electricity reduction	2% reduction or 24.87 KWH/Wheel	3.13% reduction or 24.38 KWH/Wheel	GOAL MET! CONGRATULATIONS!
Water reduction	1.5% reduction or 21.38 Gal/Wheel	2.13% reduction or 21.07 Gal/Wheel	GOAL MET! CONGRATULATIONS!

2008 EMS Objectives & Targets

	<u>Goal</u>	<u>Action plans</u>
Landfill waste reduction	4% reduction vs. 2007	Utilize a more efficient waste management partner and scrap reductions.
Natural Gas reduction	2% reduction vs. 2007	Improve productivity, scrap reduction
Electricity reduction	1% reduction vs. 2007	Reduce scrap, improved productivity and diligent monitoring/maintenance of our compressed air system.
Water reduction	1.5% reduction vs. 2007	Introduction of box molds, scrap reduction, increase wheel per hour
Phosphates	Monitor only, target usage 3lbs. Per day	Monitor and evaluate incoming chemicals, evaluate chemicals used in housekeeping

C. SCHEDULE OF IMPLEMENTATION

Department personnel in each manufacturing, quality, and maintenance area of the facility established action items for implementation of reductions. These actions, as well as performance toward the goals, are tracked in monthly Business Operating System (BOS) meetings and in periodic Environmental Health & Safety Committee (EHSC) meetings.

If goals are not being met, new action items are established and implemented.

Action items will be implemented so that goals are obtained by 12/31/08.

D. HAZARDOUS WASTE MANAGEMENT COSTS

Due to the remediation project of the chrome area, the hazardous wastes generated from the cleaning of this area will be shipped off as chrome related debris. *The chrome room remediation project was completed in June 2007. All waste associated with this project was shipped off-site to an approved TSDF.*

One 55-gallon drum of waste paint related material is maintained on-site as a hazardous waste. Off-site shipments will consist of paint related material, lamps, electronics, batteries, and caustic sludge.

E. POLLUTION PREVENTION TRAINING PROGRAMS FOR EMPLOYEES

Training regarding pollution prevention is provided to all employees during new-employee orientation, job instructions, monthly departmental meetings, annual refresher training, and through communications (electronic, verbal, and written) throughout the entire facility.

Recycling efforts are encouraged through use of collection locations and containers that are available throughout the facility.

F. RATIONALE FOR STATED PERFORMANCE GOALS

Performance goals are established at the Superior Industries Rogers facility by a cross-functional management group of the manufacturing, quality, and maintenance processes. Goals were established based on the activities of each process, their determined significant impact on the environment, and the

feasibility of action plans. Top management of the facility approved the goals, action items, and timetables established.

G. PROCESS-FLOW DIAGRAM FOR POLLUTANTS ENTERING & EXITING PROCESSES

See Attachment 1.

H. ESTIMATE OF AMOUNT OF REGULATED WASTED GENERATED BY EACH PROCESS

Combined process sludges from clarifier of approximately 20,000 gallons per year shipped off-site as non-hazardous waste to an approved facility.

Used oil and coolant shipments of approximately 20,000 gallons per year shipped off-site to an approved facility.

Caustic sludge shipments of approximately 5,000 pounds per year shipped off-site for beneficial reuse.

I. ASSESSMENT OF CURRENT & PAST POLLUTION PREVENTION ACTIVITIES, INCLUDING ESTIMATE OF REDUCTION IN TOXICITY OF REGULATED WASTE

The 2006 pollution prevention goals and performance were included in Section B of this plan. All chrome related materials have been removed from our processes.

The 2007 pollution prevention goals and performance are included in Section B of this plan. Remediation of the chrome destruct area is expected to be completed by July 2007. Upon the completion of the chrome remediation project, the amount of toxic regulated wastes will be significantly reduced. The 2008 pollution prevention goals are established and listed in this revised plan.

J. POLLUTION PREVENTION OPPORTUNITIES APPLICABLE TO FACILITY OPERATIONS

Pollution prevention opportunities are defined in Section B of this plan.

**K. POLLUTION PREVENTION OPPORTUNITIES, INCLUDING
ASSESSMENT OF COST, BENEFIT, AND CROSS-MEDIA IMPACTS**

Phosphorous reduction activities have consisted of using a Phosphate-free soap trial study conducted in January of 2007 for feasibility and testing per customer requirements. Results are expected in May of 2007. *Results indicate that the trial study successfully passed customer requirements. The cost benefits will be evaluated to determine feasibility. On-going efforts continue to eliminate Phosphates associated with maintenance and general housekeeping of the facility.*

In 2007, Helium leak test was implemented to replace water leak test units. This has been a success in reducing the amount of water generated from water leak test units.

L. IMPLEMENTATION TIMETABLE

Implementation timetable is found in Sections B and C of this plan.

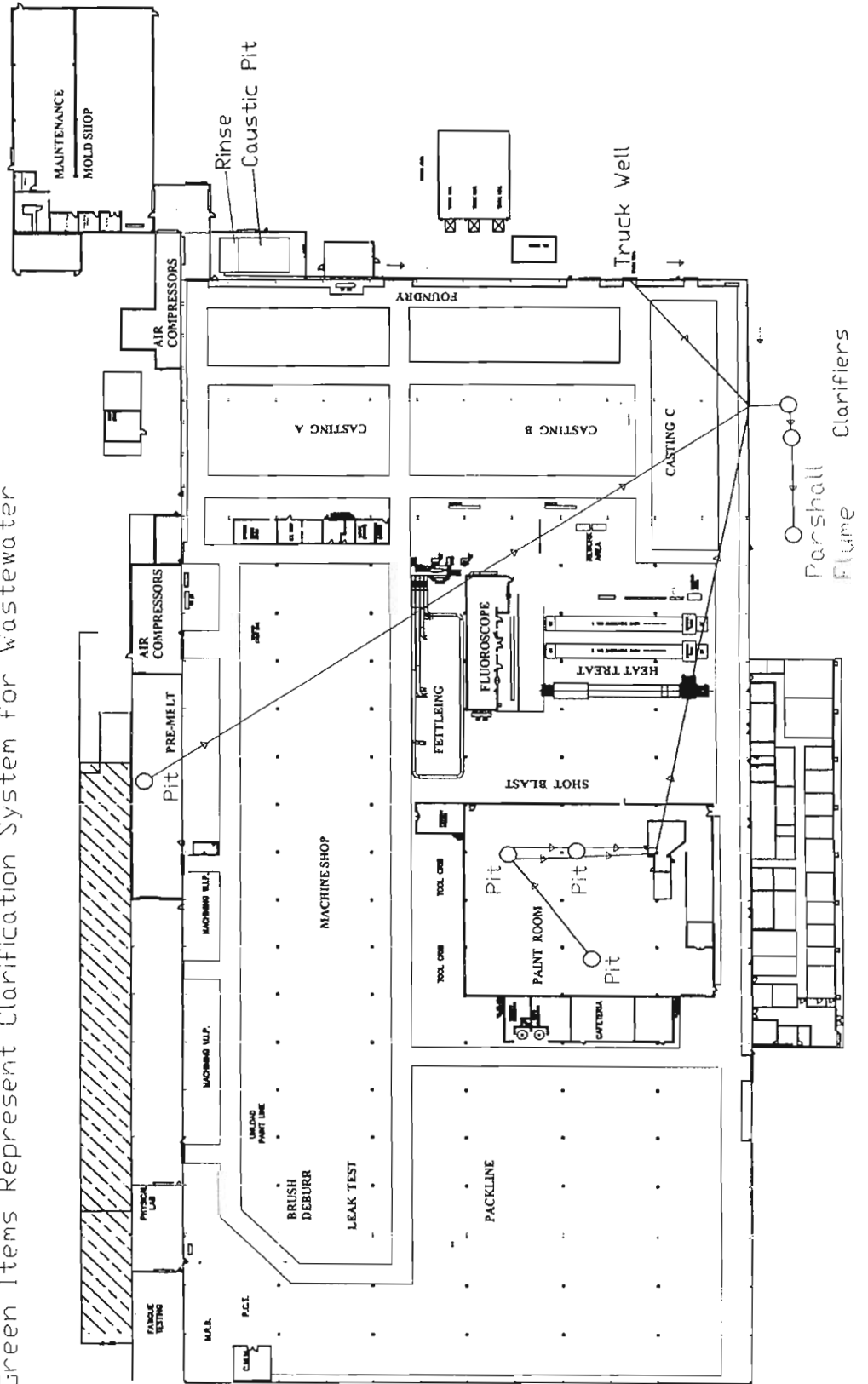
REVISIONS

- REV. 2/26/08 2007 actual data established. 2008 objectives and targets established.
- REV. 2/26/08 Section C updated to reflect action items established by EHSC.
- REV. 2/26/08 Section D updated completion of chrome remediation project.
- REV. 2/26/08 Section I updated Current Pollution Prevention goals.

Accidental Spill Prevention Plan

Appendix D

Green Items Represent Clarification System for Wastewater



A-99

ACCIDENTAL SPILL PREVENTION PLAN
(SLUG CONTROL PLAN)

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A FACILITY PROFILE

FACILITY NAME: Superior Industries International, Inc.
1301 N. Dixieland Rd.
Rogers, AR 72756

TELEPHONE: (479) 631-8037 FAX: (479) 636-6054

ASPP PLAN CONTACT:	Larry Beals	Nicholas Martini
TITLE:	General Manager	EHS Coordinator
WORK PHONE:	(479) 631-8037	(479) 631-8037
CELL PHONE:	(479) 841-4246	(479) 422-6786

SECONDARY CONTACT:	Danny East	Ron Urban
TITLE:	Maintenance Manager	Plant Manager
WORK PHONE:	(479) 631-8037	(479) 631-8037
CELL PHONE:	(479) 636-1534	(479) 445-3279

EMERGENCY RESPONSE CONTACT: Lynn Pate
TITLE: Corp. Director of Environmental Programs
WORK PHONE (479) 443-7870
CELL PHONE: (479) 445-8066

TYPE OF BUSINESS/MANUFACTURING: Aluminum Wheel Manufacturer
NUMBER OF EMPLOYEES: 1st shift: 266, 2nd shift: 188, 3rd shift: 92, Weekends: 30

OPERATING SCHEDULE: 24 hours/day, 7 days a week
AVERAGE DAILY DISCHARGE OF WATER: 72,000 gal./day and 29,000 gal. weekends

IDENTIFY ALL CATEGORICAL PRETREATMENT STANDARDS APPLICABLE TO YOUR FACILITY: Metal finishing pretreatment standard.

DESCRIPTION OF SECURITY PROVISIONS AND WARNING SIGNS AT THE FACILITY:
Security Personnel are on duty 24 hours a day, 7 days a week.

A-1. FACILITY DESCRIPTION

APPENDIX A:

Layout of the Superior Industries Facility utilizing color codes to show the areas of the plant where chemicals are stored and processes take place.

APPENDIX B:

Layout of the general flow diagram of the manufacturing process.

APPENDIX C:

The facility boundary (property line) is indicated by red lines. The area of the plant is secured with a double security fence with camera and alarms.

The east gate is operated by remote control at the security station. All other gates are chained and locked.

The main office area is alarmed!

APPENDIX D:

Drawing showing the clarification system for all wastewater exiting the facility.

B. HAZARDOUS MATERIAL PROCESSES

B-1 PAINT ROOM:

In the painting process, wheels are cleaned and dipped in chemical solution, which enables the paints (dry and wet) to stick to the surface. The tanks are of stainless steel construction with a 10,000 gal. capacity, all of which are inside a diked area.

All solutions are neutralized and pumped to the clarifiers.

B-2 PRETREATMENT PAINT ROOM:

The pretreatment area is walled on four sides and recessed two (2) feet below the main floor to protect from spillage.

The only drain is extended four (4) feet above the floor, so there is no danger of liquids leaving the area. There are two (2) holding tanks, each has a 5,500 gal. capacity, one treatment and settling tank, and a filter press.

Hexavalent chrome has been removed. Pretreatment system is in process of being removed from premises. It will be disposed of as hazardous waste.

B-3 MOLD SHOP:

The mold shop has a cleaning process, which uses liquid caustic for cleaning. This area has a 3,200 gal. stainless steel tank with lid, filled with a 25% caustic solution, and a rinse tank which holds 1,300 gal. This area is bermed and will hold 1,500 gallons when full. When no longer usable, the caustic is neutralized and the liquid pumped to the clarifiers. There is also a 925 gallon bermed area to allow molds to be rinsed off.

C. HAZARDOUS NON-PROCESS

C-1 CHEMICAL STORAGE PAINT ROOM

The paint room is one of the main areas for storage of process chemicals. The containers range in size from 5 gal. to 55 gal. for most liquids and 50 lbs. to 1250 lbs. for powder paints and soaps. Within the paint room, powder paints are stored in an air-conditioned room, temperature controlled.

Other process chemicals and powdered soaps are stored next to the tanks they are used in. All tanks and containers are properly labeled with contents and warnings. Acids are stored beside the ovens and the caustics are stored in the pretreatment area. Liquid or water base paints used in the paint room are kept in the tool crib in 5 gallon sealed containers.

C-2 CHEMICAL STORAGE TOOL CRIB

The tool crib stores chemicals ranging in sizes from 250 ml to 55 gals. All acids, caustics and flammables are independently stored in cabinets designed for this type storage with labels and warnings for contents.

The tool crib has personnel on duty 24 hrs a day and only authorized employees are inside the fenced area. Only authorized, trained, personnel can check out hazardous materials.

Bulk Oil and grease are stored in diked areas, just outside the east end of the plant and Premelt. Small containers up to 30 gal. size are stored inside the tool crib.

C-3 CHEMICAL AND WASTEWATER FLOW:

The clarifier system consists of two (2) 15,000- gallon tanks tied together by a 12-inch line. The wastewater from six (6) different locations in the plant enters the first tank then overflows into the second tank. The water then exits the second tank through an eight (8) inch line located six feet above the bottom of the tank. The twelve (12) inch line connecting the two tanks is four (4) feet above the bottom of the tank, therefore, any **oil and grease** is retained in the first tank.

Upon leaving the second tank, the water passes through a Parshall flume and metering manhole. The pH of the water is monitored 24 hrs a day with the high/low and average for the day documented. An Isco 4210 flow and meter monitors the flow through the Parshall flume. Readings are collected daily, and the information recorded and on file in Environmental Office.

There is a valve at the exit point from the second tank that can be closed in case of a spill or an emergency, thereby totally stopping all flow of water from the plant.

The six (6) areas that can send wastewater into the clarifier system are:

1. Rinse tanks Paint Room:
 - Over-Flow From rinses
 - Neutralization/disposal of spent chemical baths
 - Reject from R/O and softener regeneration
 - Neutralization/disposal of Deox DI regeneration

2. Chip Recovery
 - Wastewater from wheel washer
 - Leak testers
 - Sump pump
 - R/O Reject
3. Caustic Mold Cleaning
 - Spent/Neutralized solution
4. 3 Truck wells
 - SE well has bleed from spot cooler plumbed to it
 - Others are rain water
5. Process water of casting & air compressors
 - Bleeds go to clarifier
 - Cooling tank
 - Reject from is used to fill cooling tank, excess goes to clarifier
6. HT Process
 - Bleed & Reject from R/O

C-4 RECEIVING AND TRANSPORTING HAZARDOUS MATERIALS:

Trained receiving personnel check all incoming hazardous materials. Chemical containers with damaged or missing labels will not be accepted into the plant.

Any in-bound chemical that is missing a material safety data sheet or label, is placed in a storage area, and the Environmental Dept. is notified. Only, after all safety information is obtain and reviewed will the chemical be removed to the proper storage area. SEE APPENDIX E-CHEMICAL CONTAINER FLOW CHART.

The shipping of any hazardous material or hazardous waste is handled jointly, by the Shipping Department and the Environmental Department. A member of the Environmental Department will be present at the time of hazardous waste shipments.

Hazardous waste is handled by designated employees who have been RCRA trained and certified. All shipping and receiving personnel receive forklift, DOT, and hazardous materials training. SEE APPENDIX F-WASTE FLOW CHART.

D. SPILL AND LEAK PREVENTION

All liquid holding tanks used in manufacturing are stainless steel with stainless fittings, or they have been fitted with approved PVC fixtures. Tanks are all inside a diked area so there can be no run off to the clarifier or the city sewer.

Tanks, pumps, and fittings are checked daily by employees working in and around the listed equipment. The Environmental Department, Maintenance Department, and Supervisors check all the areas on a daily, weekly and monthly schedule. Any problems located are reported and fixed as soon as possible.

Some of the new storage tanks are polyethylene, like the new tanks used in the pretreatment area and Premelt for coolant.

Chemicals are mixed, and additions made by trained personnel inside the diked area. The chemical lab checks all process chemical tanks every four hours for concentration and liquid loss.

E. HAZARDOUS MATERIALS EQUIPMENT

COMMUNICATION:

Phones with a paging system are located in every department throughout the plant. Supervisory personnel as well as security carry two-way radios. Emergency phone numbers are located at security. Emergency and key personal will be called in the order listed.

PPE:

Full face shields

Organic/acid respirators

Poly-laminated tyvek suites

Impervious aprons

Rubber boots (nitrile)

Air monitor (4 gas)

Rope

CLEAN UP EQUIPMENT:

Booms

Absorbent mats (oils, caustics, acids)

Pumps

Brooms

Scoops

Neutralizing materials

Mercury spill kit

FIRE PROTECTION:

Automatic sprinklers are used throughout the plant, with the exception of the casting and melt area. Because of the extreme danger with molten aluminum, only heat sensors are used in this area. The sprinkler system is alarmed, which notifies security, as well as, the Rogers Fire Department.

Fire extinguishers are located throughout the plant and are checked monthly. Any extinguishers found damaged, tie missing, inspection tag missing, or with low pressure is replaced with a similar/same rating/fully charged extinguisher.

F REPORTING AND UPDATES

F-1 PROCEDURE FOR SPILL REPORTING:

Immediate notification to the General Manager and Environmental Department is required if the spill meets any of the following conditions. Then, the Accidental Spill Prevention Plan, (ASPP), must be followed.

The spill is not contained within the facilities property.

There is danger of the spill reaching the sanitary sewer.

The volume of the spill exceeds the RQ value.

When a chemical spill is found, the person finding the spill shall call the security personnel on duty, and the supervisor in charge of the area where the spill has been found. The employee making the notification shall give the location and describe the chemical (if known). The employee should not approach the spill unless he/she is wearing the required personal protective equipment. Only those employees trained in the proper handling procedures and who are knowledgeable of the hazards of the released material, shall be allowed to provide emergency assistance.

When the security personnel receive notification of a spill, they will notify the General Manager immediately and the Environmental Department. Security personnel will then direct necessary personnel as needed.

Senior Management Personnel on duty at the time of the spill will make the decision to isolate the area or evacuate employees. If evacuation is necessary, Security will be notified, and they will then move employees to a safe location.

In the event that the spill cannot be contained within the facility and there is danger of the spill reaching the sanitary sewer or the exterior of the plant, or if the volume of the spill exceeds the RQ value or is beyond "incidental level", there is a sequence of notifications that must take place immediately.

SEE APPENDIX G: NOTIFICATION CONTACTS

SEE APPENDIX H: SPILL RESPONSE LOG SHEET

F-2 UPDATING THE ASPP

The plan will be updated annually or as deemed necessary by nature of the changes that occur within the facility.

Annual updates will be forwarded to the Rogers Pollution Control Facility on April 1st of each year, or within 60 days of any major changes within the facility.

G. TRAINING

G-1 INTRODUCTION FOR NEW EMPLOYEE:

New hire orientation includes Hazard Communication, proper use of Personal Protective Equipment (PPE), Emergency Preparedness and Response Plan, Lockout/Tagout procedures, Hearing Conservation Program, and Environmental awareness.

G-2 HAZARDOUS MATERIALS HANDLING:

The training is provided to employees who, in the course of their work, are required to handle and/or mix hazardous materials. This training involves Hazard Communication, MSDS, PPE, and the safe handling of Hazardous Materials.

Any employee who works with hazardous waste will be certified under the RCRA ACT. This training, as well as chemical handling, will be conducted annually or, as needed.

G-3 HAZARDOUS MATERIALS SPILL/LEAK:

1. Incidental Spills/Leaks-"Small Size": A spill or leak of a "low-risk" hazardous material where the volume is of low quantity (less than 55 gallons) or a "high-risk" hazardous material of 5 gallons or less. Spills or leaks of hazardous materials that fall into this category may be isolated, contained, and cleaned up by employees' who are familiar with the hazards of the material and who have attended Hazard Communication Training on an annual basis.
2. Incidental Spills/Leaks-"Moderate Size": A spill or leak of a "low risk" hazardous material whose volume does not exceed 200 gallons or a spill/leak of a "high risk" hazardous material whose volume is between 5-55 gallons.

G-4 FIRST AID:

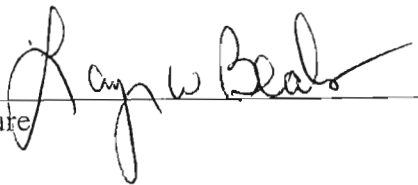
First Responders' and EMTs' are on-site to respond to an emergency situation. If additional medical care is needed, a list of area hospitals and clinics with phone numbers are on file at Security.

G-5 COMPRESSED GASES:

The supplying vendor will conduct the training for all employees who handle compressed gas cylinders. Additional training will be accomplished as needed with new employees or as refresher training.

H. CERTIFICATION

I certify that the information provided in this document is to the best of my knowledge true and that the accidental spill prevention measures described in the document are implemented as described.

Signature 

Date 7/31/08

- REV. 11/16/01 UPDATED CELL PHONE #'S, ADDED G-6 ARGON GAS
- REV. 08/06/02 UPDATED NAMES AND PHONE NUMBERS
- REV. 03/17/03 UPDATED A, B-2, B-3, C-3, APPENDIX A, B, C, D, G
- REV. 03/16/04 UPDATED CELL PHONE #'S FOR PLANT MGR. AND MADE CORRECTIONS FOR CLARIFICATION
- REV. 11/08/05 UPDATED 'FACILITY PROFILE', SECTIONS B-1, C-3, E-1 (FIRST AID) E-2 (UPDATED 'TEAM MEMBERS', DELETED 'TRAINING REQUIREMENT' AND 'RESPONSE TRAINING'), F-1, G-3, G-4, UPDATED PHONE NUMBERS ON APPENDIX G PER ECR R-5161
- REV. 03/21/06 Changed daily flow from 90,000 gl./day to 65,000
Referenced destruct system removal and disposal
Included Security Awareness is training
- REV. 03/26/07 Updated contact list. Remove argon and propane, as this training is included
In compress gases. Removed reference to Emergency Response Team, as Chrome has been removed from the facility. Number of employees. Average daily discharge of water.
- REV. 02/26/08 Updated Corporate Director of Environmental-Lynn Pate, removed T. Barry.

APPENDIX G

NOTIFICATION CONTACTS
FOR
ACCIDENTAL SPILL PREVENTION PLAN

In the event of a hazardous material spill that meets any of the following conditions, the company personnel will be contacted.

- A. The spill is not contained within the facilities property.
- B. There is danger of the spill reaching the sanitary sewer.
- C. The volume of the spill exceeds the RQ value.

The spill response log sheet should be completed before calling management.

Company contact list:

Larry Beals Cell Phone _____	479-841-4246
Nick Martini _____	479-631-8037
Cell Phone _____	479-422-6786
Lynn Pate _____	479-443-7870
Cell Phone _____	479-445-8066
Danny East _____	479-636-1534
Cell Phone _____	479-636-1534
Ron Urban Cell Phone _____	479-445-3279

Company Management, depending on the nature of the spill may contact the following:

Haz-mat _____	479-636-4566
Rogers Pollution Control Facility _____	479-273-7378
Fire Department _____	479-636-1234
Ambulance _____	479-636-1234
Police Department _____	479-636-4141

State Agencies:

Arkansas Dept. of Environmental Quality	479-562-7444
Arkansas Dept. of Health _____	479-661-2000

APPENDIX H

SUPERIOR INDUSTRIES INTERNATIONAL, INC.
1301 N. DIXIELAND RD.
ROGERS, AR 72756
PH. 479-631-8037

SPILL INFORMATION

Type of spill _____

Reported by _____

DESCRIPTION OF SPILL

Date _____ Time _____

Material spilled _____ Amount _____

Containment if any _____

HEALTH AND SAFETY HAZARD

Fire _____ Explosive _____ Fumes _____ Corrosive _____

GENERAL MANAGER (or designee) NOTIFIED

Date _____ Time _____ Comments _____

SPILL TEAM NOTIFIED

Date _____ Time _____

Corporate Director of Environmental Programs

Date _____ Time _____

MANAGEMENT NOTIFICATION ONLY

Local Agencies Notified

Name _____ Date _____ Time _____

State Agencies Notified

Name _____ Date _____ Time _____



NPDES Compliance Inspection Report

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

Section A: National Data System Coding

Transaction Code 1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/>	NPDES 3 AR 0043397 11	yr/mo/day 12 08 05 13 17	Inspection Type 18 <input type="checkbox"/> 6 <input type="checkbox"/>	Inspector 19 <input type="checkbox"/> S <input type="checkbox"/>	Fac Type 20 <input type="checkbox"/> 1 <input type="checkbox"/>
Remarks Rogers Pretreatment Program Audit					
Reserved 67 <input type="checkbox"/> <input type="checkbox"/> 69	Facility Evaluation Rating 70 <input type="checkbox"/>	BI 71 <input type="checkbox"/>	QA 72 <input type="checkbox"/>	Reserved 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> <input type="checkbox"/> 80	

Transaction Code 1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/>	NPDES 3 AR 0043397 11	yr/mo/day 12 08 05 14 17	Inspection Type 18 <input type="checkbox"/> 4 <input type="checkbox"/>	Inspector 19 <input type="checkbox"/> S <input type="checkbox"/>	Fac Type 20 <input type="checkbox"/> 2 <input type="checkbox"/>
Remarks 04 SDA site visits					
Reserved 67 <input type="checkbox"/> <input type="checkbox"/> 69	Facility Evaluation Rating 70 <input type="checkbox"/>	BI 71 <input type="checkbox"/>	QA 72 <input type="checkbox"/>	Reserved 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> <input type="checkbox"/> 80	

Section B: Facility Data

Name and Location of Facility Inspected Rogers' Pret. Prog. Audit (City of Rogers) 4300 Rainbow Rd Rogers, AR 72758	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 7:30 5/13/08	Permit Effective Date 3/1/06
	Exit Time/Date 3:00 pm 5/15/08	Permit Expiration Date 2/28/11

CODE SHEET

Pretreatment Audit

Auditor's Name	<u>G. Lillian</u>	
Permit Number	<u>AR0043397</u>	
Audit Date	<u>5/13-15/08</u>	DTIA
Date Permit Modified to require pretreatment	<u>1/13/84</u>	PTIM

PPETS WENDB DATA ELEMENTS

Significant IUs without Control Mechanisms	<u>0</u>	NOCM
Number of Significant IUs	<u>12</u>	SIUS
Number of Categorical IUs	<u>5</u>	CIUS
Technical Evaluation for Local Limits	<u>Y</u>	EVLL
Adoption of Technically-Based Local Limits	<u>Y</u>	ADLL
Significant IUs not inspected or sampled	<u>0</u>	NOIN*
Significant IUs in significant noncompliance with standards or reporting	<u>1</u>	PSNC*
Significant IUs in significant noncompliance with self-monitoring	<u>0</u>	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	<u>0</u>	SNIN*