

Joe

ADEQ

ARKANSAS
Department of Environmental Quality

May 8, 2006

Tom McAlister, Superintendent
Water and Wastewater
City of Rogers
P.O. Box 338
Rogers, AR 72757

DEPARTMENT OF ENVIRONMENTAL QUALITY
JUN 1 4 06
50411 2006
AB

RE: AFIN: 04-00155

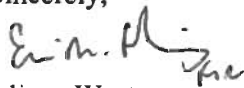
NPDES Permit No.: AR0043397

Dear Mr. McAlister:

On April 26, 2006, Dale Washam, District Field Inspector Supervisor, and I performed a routine pretreatment compliance inspection of the waste water treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. This inspection revealed that you are in compliance with terms of your permit.

If I can be any assistance, please contact me at 479-927-3257 ext 12.

Sincerely,



Alison West
District Field Inspector
Water Division

cc: NPDES Branch

COMPLIANCE FILES
NPDES # 43397
DMR'S *SL*
NCR
 CORRESPONDENCE
CRAS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

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

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 A R 0 0 4 3 3 9 7 11 12 0 6 0 4 2 6 17 18 P 19 S 20 1	Remarks				
A F I N 0 4 - 0 0 1 5 5					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Rogers Wastewater Treatment Plant 4300 S Rainbow Road Rogers, AR 72757	Entry Time /Date 8:35 a.m./4-26-06	Permit Effective Date 3-1-2006
	Exit Time/Date 4:30 p.m./4-26-06	Permit Expiration Date 2-28-2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Bob Winnes/Environmental Compliance Specialist/479-273-7378/479-273-7627	Other Facility Data Effluent Parshall Flume GPS: N36-18-13.1 W094-12-51.3 Gate: N36.29789 W94.21262	
Name, Address of Responsible Official/Title/Phone and Fax Number Tom McAlister/Water and Wastewater Superintendent/479-273-7378/479-273-7627 City of Rogers P.O. Box 338 Rogers, AR 72757	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other: Effluent Limits

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

No Comments.

Name(s) and Signature(s) of Inspector(s) Alison West	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/ Springdale/479-927-3257 ext 12/479-927-3261	Date May 3, 2006
Dale Washam ddw	Arkansas Dept. of Environmental Quality / Mammoth Spr./ 870-625-7477 / 870-625-7699	May 8, 2006
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

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Name of Municipality: City of Rogers

AFIN Number: 04-00155

NPDES Permit Numbers: AR0043397

Program Tracked under NPDES Permit Number: AR0043397

Fact Sheet Preparation Date: 1-26-2006

Date of Last PCI/Audit: 3-23-05/6-21through 23/04

Date of Last Annual Report: 2-1-06

Name of Inspector: Dale Washam/Alison West

Date PCI Performed: 4-26-06

Name, Title, and Telephone Number of Facility Representative:
Bob Winnes/Environmental Compliance Specialist/479)273-7378

Name and Title of Other Participants: N/A

Number of IUs Visited: 2

Name(s) of IUs Visited: Superior Industries and Pel-Freeze

Note: AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

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NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

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Bob Winnes/Environmental Compliance Specialist/(479)273-7378

Name and Title of Other Participants: N/A

Number of IUs Visited: 2

Name(s) of IUs Visited: Superior Industries and Pel-Freeze

Note: AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

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NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. No SIUs have been added or deleted since last inspection.
2. Has ADPC&E or EPA been notified of these changes? NA
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes
4. What procedures are being used to update the IU Survey?
Industry User waste survey forms, Industry User questionnaire forms, and site visits. The Chamber of Commerce sends a list of new companies. The city, also receives new connections from water department.
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 12
6. Number of Categorical Industrial Users: 5
7. How does the POTW determine the appropriate categorical standards to apply to an IU?
Inspections, site visits, BMR's, Industry User survey form, Federal Register 40 CFR
8. List all categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (such as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.
- | Name of IU: | Category: | Regulated Process: |
|--------------------------------|-------------------------|-------------------------|
| <u>Bekeart</u> | <u>Metal Finisher</u> | <u>Plating, Coating</u> |
| <u>Mafco</u> | <u>Metal Finishing</u> | <u>Phosphating</u> |
| <u>Preformed Line Products</u> | <u>Aluminum Forming</u> | <u>Quench and Rinse</u> |
| <u>Superior Industries</u> | <u>Metal Finishing</u> | <u>Phosphating</u> |
| <u>Kennametal</u> | <u>Metal Finishing</u> | <u>Phosphating</u> |

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADPC&E OR EPA? Yes

2. Describe any apparent problems with the local limits.
None

2. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	

Metals:

influent	<u>monthly</u>	<u>Quarterly</u>	<u>N/A</u>	<u>N/A</u>
effluent	<u>monthly</u>	<u>Quarterly</u>	<u>N/A</u>	<u>N/A</u>
sludge	<u>6/Year</u>	<u>Quarterly</u>	<u>N/A</u>	<u>N/A</u>

Organics:

influent	<u>Yearly</u>	<u>Yearly</u>	<u>N/A</u>	<u>N/A</u>
effluent	<u>Yearly</u>	<u>Yearly</u>	<u>N/A</u>	<u>N/A</u>
sludge	<u>NA</u>	<u>NA</u>	<u>N/A</u>	<u>N/A</u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective? No

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Permit

2. How many IU permits (or other control documents) have been issued? 13 (12 SIU's, and 1 Non SIU)

3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**
Yes

4. Does the control document contain the following items?
An expiration date Yes
Discharge limitations Yes

If the program requires self-monitoring by the IUs, do the permits contain

IU self-monitoring requirements Yes

IU reporting requirements Yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

sample location Yes
type of sample Yes
monitoring frequency Yes
bypass prohibition Yes
right of entry Yes
nontransferability Yes
revocation clause Yes
penalty provisions Yes
slug load notification Yes
notification of process change Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>1/Year</u>	<u>1/Year</u>
other SIUs	<u>1/Year</u>	<u>1/Year</u>
Inspection:		
categorical IUs	<u>1/Year</u>	<u>1/Year</u>
other SIUs	<u>1/Year</u>	<u>1/Year</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes
3. Are inspections announced or unannounced? Unannounced
4. Are records kept of each inspection? Yes
5. Does the inspection report contain an adequate description of the following: (Reviewed 2 inspections: Pel-Freeze and Superior Industries)
- Date and time of inspection Yes
- Officials present Yes
- Inspection of chemical storage areas Yes
- Description of regulated processes, categorical wastestreams, and discharge location of these wastestreams Yes
- Inspection of the pretreatment facilities Yes
- Review of self-monitoring records Yes
- Observation of IU self-monitoring procedures Yes
- Verification that approved analytical techniques are used Yes
- Verification of IU flow measurement (where required) No,
but require IU's to service and calibrate flow devices 1/year

6. Overall adequacy of inspection documentation:

Good

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).

Yes. However, it was observed in Superior Industries file that Aluminum and TTO were not being sampled by the city because these two parameters are report only.

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes

9. Are sampling and flow monitoring equipment properly maintained? Yes

10. Is the POTW keeping proper field notes and chain of custody forms? Yes. However, it is strongly recommended that duplicates be analyzed on pH when doing analysis on the industries. It is, also, recommended that the following information be documented on pH: date and time of sampling, sampler, date and time of analyst, analyst, methodology, and exact location.

11. Is the sampling location representative of the discharge to the collection system? Yes

12. Are sampling locations identified in POTW records? Yes

13. Are sampling services available in an emergency? Yes

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? All reports etc are logged in upon receipt, reviewed, and filed. The data is inputted to the computer tracking system.

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes, by Louanne Diffen and Bob Winnes. Information is entered into 2 programs in the computer. The report is filed in the I.U. file.
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes
17. What are the POTW's procedures for following up violations?
Follows enforcement response plan.
18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? No new categoricals since last inspection.

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

- Name and address N/A
- Other environmental permits held N/A
- Description of operations N/A
- Process flow diagrams N/A
- Flow measurements N/A
- Measurements of regulated pollutants N/A
- Certification of compliance by the IU N/A
- Compliance schedule (if needed) N/A

19. Additional comments on the POTW's inspection and sampling procedures: The facility has an excellent program for inspection and sampling of industrial users.

E. ENFORCEMENT

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, See Attachment #1.

2. How does the POTW respond to the following violations?

Effluent limitations See Attachment #1

Late reports See Attachment #1

Unpermitted discharges See Attachment #1

Slug loads or spills See Attachment #1

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes.

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
Model Laundry	Failure to meet permit limits	NOV and Increased self-monitoring	NA

5. Comments on the POTW's enforcement procedures:

No comments on the POTW's enforcement procedures.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program?

Yes

2. Are staffing levels adequate? Yes

3. Are the responsible officials familiar with the approved program?

Yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: No

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area?

N/A

3. Does the POTW have copies of permits for IUs in user cities?

N/A

4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? N/A

5. Comments on multijurisdictional issues:

N/A

H. EVALUATION AND COMMENTS

The facility documents were well organized. The pretreatment program was great.

Multiple horizontal lines for writing or additional comments, currently blank.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Superior Industries

POTW Name: City of Rogers

Industry Contacts: John Fisher.

Date and Time of Visit: 4-26-06/ 1:45 p.m.

Description of Manufacturing Process: Metal drawing, heat treating, plating, cabling operation to manufacture steel cord for steel belted radial tires.

Sources of Process Wastewater:

Pickling baths, Plating baths, scrubbers discharge

Categorical Industry? Yes

Description of Pretreatment Equipment and Procedures: Pretreatment process consists of pH adjustment, neutralization, precipitation, clarification, equalization, and sludge dewatering.

Spill Prevention and Solvent Management Procedures:

Slug control plan and pollution prevention plan in place to prevent occurrences of spills and slugs.

Sampling Location and Equipment: Bekaert's sampling location is located on the west side of the pretreatment building. The monitoring facility contains an ISCO 3710 refrigerated sampler, 2 flow meters, an in-line pH meter w/ISCO 2410 strip chart recorder, an in-line turbidimeter, and a 2 v-notch weir.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Pel-Freeze Arkansas, LLC

POTW Name: City of Rogers

Industry Contacts: Carolyne Wendel

Date and Time of Visit: 4-26-06/3:50 p.m.

Description of Manufacturing Process: Process rabbits for meat and use animal by-products to produce raw products for biotechnology companies.

Sources of Process Wastewater:

Receiving, Kill/Blood/Skin, Cut, Wash, Cut/Package, Brain Lab Area.

Categorical Industry? No

Description of Pretreatment Equipment and Procedures: Pel-Freeze does not have a pretreatment system.

Spill Prevention and Solvent Management Procedures:

SPCC plan.

Sampling Location and Equipment: Monitoring flume is located outside the rabbit holding area along the east wall off of Arkansas Street. There is an automatic samplers (ISCO 2910) and flow meters (Isco 4230). The flow meter is calibrated yearly.

PPETS CODE SHEET

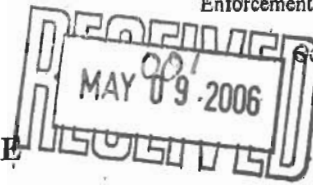
PRETREATMENT COMPLIANCE INSPECTION (PCI)

	CODE
INSPECTOR'S NAME <u>Dale Washam/Alison West</u>	
NAME OF FACILITY <u>City of Rogers</u>	
PERMIT NUMBER USED TO TRACK PROGRAM <u>AR0043397</u>	NPID
DATE OF PCI <u>4-26-06</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS) <u>12</u>	SIUS
NUMBER OF CATEGORICAL IUS <u>5</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW <u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM <u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING <u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS <u>1</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW <u>0</u>	SNIN

ENFORCEMENT RESPONSE GUIDE



A. PERMITTED INDUSTRIAL USERS

1. Discharge Limit Violation

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Permit Limit Violation	Single occurrence; does not exceed TRC; no harm to the environment or POTW	NOV	ESC
	Single occurrence; exceeds TRC; no harm to the environment or POTW	NOV	ESC
	Occurrence causes harm to the environment or POTW	AO with possible fine, Emergency suspension, Permit revocation, Civil litigation, Criminal prosecution, and/or Termination of discharge	ESC or UM ESC or UM ESC or UM UM UM and PA UM
	Second NOV for same limit; 3 times in any 12-month period	NOV and Informal meeting with IU	ESC ESC
	Occurrences exceed same limit 66% of the time in any 6-month quarter; no harm to the environment or POTW	IU is SNC and NOV	ESC
	Occurrences exceed same TRC limit 33% of the time in any 6-month quarter; no harm to the environment or POTW	IU is SNC and NOV	ESC
	Repeated incidence of SNC; same limit violation for 3 consecutive quarters	AO with possible fine Civil litigation Termination of discharge	ESC or UM UM UM
	Repeated incidence of SNC; same limit violation for 2 consecutive quarters; no effort to comply with permit regulations	AO with possible fine and/or Permit revocation	ESC or UM ESC or UM
	Single occurrence; evidence of negligence or intent	AO with possible fine, Permit revocation, and/or Termination of discharge	ESC or UM ESC or UM UM
	Repeated occurrences; evidence of negligence or intent; 3 times in any 12-month period	Show cause order Civil litigation Criminal prosecution Termination of discharge	ESC or UM UM UM and PA UM

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Late Reports	Document is 5 days or more late	NOV	ET or ESC
	Document is 30 days or more late	IU is SNC and AO with possible fine and/or Permit revocation	ESC or UM ESC or UM
	Document is 90 days or more late	Show cause order Civil litigation Termination of discharge	ESC or UM UM UM
	Documents are repeatedly late; 3 times in any 12-month period	AO with possible fine Civil litigation	ESC or UM UM
	Failure to submit BMR 90 days prior to commencement of discharge	Show cause order Civil litigation Termination of discharge	ESC or UM UM UM
	Failure to submit CSR within 14 days after the scheduled date	AO with possible fine Civil litigation Termination of discharge	ESC or UM UM UM
Falsification	Falsification of information or data	IU is SNC and AO with fine Criminal prosecution and/or Permit revocation Termination of discharge	ESC or UM UM and PA ESC or UM UM
Permit Application	Failure to submit permit application 90 days prior to beginning or recommencing discharge	Informal notice and meeting NOV	ESC ESC
	Failure to submit permit renewal application 90 days prior to permit expiration	NOV AO with possible fine	ESC ESC or UM
	Failure to provide accurate information on permit application; no intent to comply	NOV and/or Permit revocation	ESC ESC or UM
	Failure to submit permit application within 30 days of due date	AO with possible fine and/or Permit revocation	ESC or UM ESC or UM
Enforcement Response	Failure to respond to NOV within 15 days	AO with possible fine	ESC or UM
	Repeated failure to respond to NOV within 15 days; 3 times in any 12-month period	Show cause order Civil litigation Termination of discharge	ESC or UM UM UM

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Enforcement Response (cont.)	Failure to satisfy AO requirement and/or deadline	Civil litigation Criminal prosecution Termination of discharge	UM UM and PA UM
	Failure to pay fines within 30 days	Criminal prosecution and/or Permit revocation Termination of discharge	UM and PA ESC or UM UM
	Failure to publish SNC response notice in local paper	Permit revocation Termination of discharge	ESC or UM UM
Violation Notification	Failure to notify CA of a violation within 24 hours; no harm to the environment or POTW; single occurrence	Informal Notice NOV and possible fine	ET or ESC ESC
	Failure to notify CA of a violation within 24 hours: harm to the environment or POTW	IU is SNC and AO with possible fine, Emergency suspension Civil litigation Criminal prosecution, and/or Termination of discharge	ESC or UM ESC or UM UM UM and PA UM
	Repeated failure to notify CA of a violation; 3 times in any 12-month period	Show cause order, Civil litigation, Criminal prosecution, and/or Termination of discharge	ESC or UM UM UM and PA UM
Slug Notification	Failure to immediately notify CA of slug or spill	NOV or AO with possible fine	ESC ESC or UM
	Failure to submit slug or spill report within 5 days of incident	AO with possible fine	ESC or UM
	Repeated failure to report slug or spill incidents; after first offense	Show cause order Civil litigation Criminal prosecution Termination of discharge	ESC or UM UM UM and PA UM
Planned Change	Failure to report significant planned change in production and/or discharge 90 days prior	NOV and/or AO with possible fine or Permit revocation	ESC ESC or UM ESC or UM
	Repeated failure to report significant planned change in production and/or discharge; after first offense	AO with possible fine Civil litigation Criminal prosecution Termination of discharge	ESC or UM UM UM and PA UM
Ownership Transfer	Failure to notify CA of transfer of ownership 30 day prior to transfer	NOV and/or AO with possible fine or Permit revocation	ESC ESC or UM ESC or UM

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Compliance Schedule	Missed interim date; will not affect final or other interim dates	Informal notice/meeting and Site visit	ESC
	Missed interim date; will affect other dates; reasonable cause for delay	NOV and Informal meeting and/or AO with possible fine	ESC ESC ESC or UM
	Missed interim date; will affect other dates: no reasonable cause for delay	IU is SNC and AO with possible fine Civil litigation Termination of discharge	ESC or UM UM UM
	Missed final date by more than 30 days; reasonable cause for delay	AO with possible fine	ESC or UM
	Missed final date by more than 30 days; no reasonable cause for delay	IU is SNC and Show cause order Civil litigation Termination of discharge	ESC or UM UM UM
	Failure to meet 90-day compliance schedule dates	NOV and informal meeting AO with possible fine and/or Permit revocation	ESC ESC or UM ESC or UM
	Repeated failure to meet 90-day compliance schedule dates; after first offense	IU is SNC and Show cause order Civil litigation Termination of discharge	ESC or UM UM UM
Accidental Discharge, Upset Condition and Bypass	Failure to notify CA of accidental discharge, upset condition and/or bypass within 24 hours	NOV or AO with possible fine	ESC ESC or UM
	Failure to submit accidental discharge, upset condition and/or bypass report within 5 days	NOV or AO with possible fine	ESC ESC or UM
	Failure to provide accurate/ adequate information on accidental discharges, upset conditions and/or bypasses	NOV or AO with possible fine	ESC ESC or UM
	Failure to notify CA 10 days prior to anticipated bypass	NOV or AO with possible fine	ESC ESC or UM
	Repeated failure to notify, submit report, and/or provide necessary information on any accidental discharge, upset condition and/or bypass	AO with possible fine, permit revocation, and/or termination of discharge	ESC or UM ESC or UM UM

4. General Permit Violations

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Dilution	Wastestreams are diluted in lieu of treatment; first offense	AO with possible fine	ESC or UM
	Repeated incidences of dilution; after first offense	Show cause order Termination of discharge	ESC or UM UM
Noncompliance Action	Failure to mitigate noncompliance or halt production/discharge; no harm to the environment or POTW	NOV AO with possible fine	ESC ESC or UM
	Failure to mitigate noncompliance or halt production/discharge; harm to the environment or POTW	AO with possible fine, Emergency suspension, Civil litigation, Criminal prosecution, and/or Termination of discharge	ESC or UM ESC or UM UM UM and PA UM
	Repeated failure to mitigate noncompliance or halt production/discharge; after first offense	Show cause order, Civil litigation, Criminal prosecution, and/or Termination of discharge	ESC or UM UM UM and PA UM
Pretreatment Operations	Failure to properly operate and maintain pretreatment facility; no harm to the environment or POTW	NOV	ESC
	Failure to properly operate and maintain pretreatment facility; harm to the environment or POTW	AO with possible fine, Emergency suspension, Civil litigation, and/or Termination of discharge	ESC or UM ESC or UM UM UM
	Repeated failure to properly operate and maintain pretreatment facility; after first offense	Show cause order, Civil litigation, and/or Termination of discharge	ESC or UM UM UM
Slug/Spill Discharge	Slug/Spill discharge; no harm to the environment or POTW	NOV and requirement to develop SCP	ESC
	Slug/Spill discharge; harm to the environment or POTW	IU is SNC and AO with possible fine, Emergency suspension, Civil litigation, Criminal prosecution, and/or Termination of discharge	ESC or UM ESC or UM UM UM and PA UM

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Slug/Spill Discharge (cont.)	Repeated incidences of slug/spill discharges; after first offense	IU is SNC and Show cause order, Civil litigation, Criminal prosecution, and/or Termination of discharge	ESC or UM UM UM and PA UM
Hazardous Waste	Failure to notify CA of hazardous waste discharge within 180 days of discharge	NOV or AO with possible fine	ESC ESC or UM
	Failure to notify CA of hazardous waste discharge within 90 days of new regulation	NOV or AO with possible fine	ESC ESC or UM
	Failure to notify CA of change in hazardous waste discharge	NOV or AO with possible fine	ESC ESC or UM
	Repeated failure to notify CA of any hazardous waste discharge condition	Show cause order Civil litigation Termination of discharge	ESC or UM UM UM
Plan Requirements: TOMP, SCP, P2, EMS and other required plans	Failure to submit required plan; by more than 30 days; reasonable cause	NOV or AO with possible fine	ESC ESC or UM
	Failure to submit required plan; by more than 30 days; no reasonable cause	Show cause order Civil litigation Termination of discharge	ESC or UM UM UM
	Failure to submit required plan; by more than 90 days;	IU is SNC Civil litigation Termination of discharge	UM UM
	Failure to submit updated plan; by more than 30 days;	NOV or AO with possible fine	ESC ESC or UM
	Failure to submit updated plan; by more than 90 days;	IU is SNC Civil litigation Termination of discharge	UM UM
	Failure to implement an approved plan; intent to comply	NOV or AO with daily accumulated fine Permit revocation	ESC ESC or UM ESC or UM
	Failure to implement an approved plan; no intent to comply	IU is SNC Civil litigation Termination of discharge	UM UM

5. Violations Detected Primarily During Site Visits

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Permit Requirements	Failure to comply with permit requirements; no evidence of intent and/or negligence	NOV	ESC
	Failure to comply with permit requirements; evidence of intent and/or negligence	IU is SNC and AO with possible fine	ESC or UM
	Repeated failure to comply with permit requirements; 3 times in 12-month period	Show cause order Civil litigation Termination of discharge	ESC or UM UM UM
Facility Access	Failure to provide safe and easy access to facility, monitoring site and/or equipment	NOV or AO with possible fine	ESC ESC or UM
	Unreasonable delay in allowing CA access to facility; 15 minute delay with no contact	NOV and/or Permit revocation	ESC ESC or UM
	Entry denied or consent withdrawn	Obtain warrant and return to IU Termination of discharge	ET or ESC UM
Records/Documents	Access to or copies of records and/or documents denied	Obtain warrant and return to IU Termination of discharge	ET or ESC UM
	Failure to maintain records and/or documents for minimum 3 years	AO with possible fine Civil litigation	ESC or UM UM
Analytical Procedures	Failure to satisfy 40 CFR 136 analytical procedure requirements ;any instance; no evidence of intent and/or negligence	NOV or AO with possible fine	ESC ESC or UM
	Failure to satisfy analytical procedures requirements; any instance; evidence of intent and/or negligence	IU is SNC and AO with possible fine.	ESC or UM
	Repeated failure to satisfy analytical procedures requirements; any instance; after first offense	Show cause order Civil litigation Termination of discharge	ESC or UM UM UM

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Illegal Discharge	Illegal discharge detected; no harm to the environment or POTW; no evidence of intent and/or negligence	NOV or AO with possible fine	ESC ESC or UM
	Illegal discharge detected; harm to the environment or POTW; no evidence of intent and/or negligence	AO with possible fine Emergency suspension Civil litigation Criminal prosecution, and/or Termination of discharge	ESC or UM ESC or UM UM UM and PA UM
	Illegal discharge detected; harm to the environment or POTW; evidence of intent and/or negligence.	Civil litigation or termination of discharge	UM
	Repeated illegal discharges detected; harm to the environment or POTW; after first offense	Show cause order Civil litigation, Criminal prosecution, and/or Termination of discharge	ESC or UM UM UM and PA UM
Improper Sampling	Unintentional sampling at incorrect location	Informal notice/meeting NOV	ET or ESC ESC
	Unintentional use of incorrect sample type	Informal notice/meeting NOV	ET or ESC ESC
	Unintentional use of incorrect collection techniques	Informal notice/meeting NOV	ET or ESC ESC
	Intentional failure to satisfy sample location, type, and/or collection requirements	AO with possible fine Civil litigation Criminal prosecution Termination of discharge	ESC or UM UM UM and PA UM
	Repeated failure to satisfy sample location, type, and/or collection requirements; 3 times in any 12-month period	IU is SNC and Civil litigation with fine Criminal prosecution Termination of discharge	UM UM and PA UM
Monitoring Equipment	Failure to maintain sampling equipment in working condition	NOV	ESC
	Failure to calibrate flow meter by certified technician at least once a year	NOV	ESC

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Inadequate Recordkeeping	Files incomplete and/or missing; no evidence of intent	Informal notice/meeting NOV	ET or ESC ET or ESC
	Repeated incidence of incorrect and/or missing files; after first incident	AO with possible fine	ESC or UM
	Files incomplete and/or missing; evidence of intent	Show cause order Civil litigation Termination of discharge	ESC or UM UM UM
Additional Monitoring	Failure to report additional monitoring; additional files found during inspection	NOV	ET or ESC
	Repeated incidences of failure to report additional monitoring	AO with possible fine and/or Permit revocation	ESC or UM ESC or UM

B. NONPERMITTED INDUSTRIAL USERS

<u>Noncompliance</u>	<u>Nature of Violation</u>	<u>Enforcement Response</u>	<u>Personnel</u>
Unpermitted Discharge	IU unaware of requirement and no harm to environment or POTW	Informal notice/meeting accompanied with permit application form	ET or ESC
	IU unaware of requirement; harm to the environment or POTW	IU is SNC and NOV, AO with possible fine, Emergency suspension, Civil litigation, and/or Termination of discharge	ESC ESC or UM ESC or UM UM UM
	IU aware of requirement and no harm to environment or POTW	NOV or AO with possible fine	ESC ESC or UM
	IU aware of requirement; harm to the environment or POTW	IU is SNC and AO with possible fine, Emergency suspension, Civil litigation, and/or Termination of discharge	ESC or UM ESC or UM UM UM
	Permit Application	Failure to apply for permit application within 30 days after receiving notice by CA	NOV AO with possible fine Civil litigation
Failure to submit permit application 90 days prior to discharge		Informal meeting and NOV	ET or ESC ESC
Permit application is 30 days late		NOV AO with possible fine	ESC ESC or UM
Permit application is 90 days or more late		Show cause order Civil litigation	ESC or UM UM

or hand delivering the IUS to the IU or via telephone calls or onsite visits. The IUS shall be completed for all SIUs. Survey forms completed by the IUs have a specific deadline for completion and return. A copy of the IUS is in the Pretreatment Procedures Manual.

If the Control Authority already has portions of the survey information on file then the IU only needs to submit the outstanding information. Information collected within the last three years may be considered up-to-date provided the Control Authority is confident that the IU's operations did not significantly change. The Control Authority may elect to accept information gathered from an industrial user permit application (IUPA) in lieu of the IUS, provided the necessary information is on file and has not changed since the last survey. A new source discharger will be required to submit the projected pollutants that will be discharged with estimated concentrations.

The Control Authority logs and tracks all IUS to determine whether an IUS has been returned and/or has met the deadline. A copy of the tracking form is in the Pretreatment Procedures Manual. The Control Authority will issue reminder letters or conduct follow-up telephone calls and/or on-site visits to any IU who fails to submit the IUS within the established deadline. All completed surveys are checked for accuracy and completeness.

4.1.3 Survey Findings

The Control Authority will use the information gathered from the survey to summarize the type and number of IUs and the types and quantities of specific pollutants, particularly toxic pollutants, entering the POTW. Verification of the information may require a site visit and/or compliance monitoring to determine accuracy of the responses. A detailed inspection may be performed to determine the industrial user's classification, verify data submitted in the IUS, observe process and manufacturing operations, and determine if additional pretreatment requirements are warranted; such as a slug control plan (SCP), pollution prevention (P2) plan, water conservation (WC) plan, or an environmental management system (EMS) plan. The industrial user may be asked to self-monitor the non-domestic wastestream to determine if the discharge complies with applicable standards.

The Control Authority will compare the industrial user information gathered from the survey with the categorical classification information in 40 CFR Chapter 1 Subchapter N Parts 403-471 to determine if the industrial user is listed by EPA as a categorical industrial user (CIU). Once all the data has been evaluated, the Control Authority will make a final decision on classifying the industrial user as SIU or SNDU. Dischargers that do not meet classification criteria must comply with local, state and federal regulations but are not covered in this IPPM. A categorical industries that does not discharge to the POTW, referred to as a dry categorical industry, will be classified as a non-discharging categorical industrial user (NDCIU) and will be reported accordingly in the City's Annual Pretreatment Report to ADEQ.

The Control Authority will notify any newly classified SIU or SNDU of the regulatory standard and/or nature of concern. The new source SIU will be issued a letter explaining the categorical classification as set forth in Section 4.3 of this document. The SIU will be required to complete an industrial permit application. The SNDU may be asked to implement best management practices (BMP). The Control Authority maintains a complete and up-to-date listing of each SIU and SNDU which discharges to the POTW. The survey information is also consistent with the information submitted to ADEQ for the Annual Pretreatment Report.

An industrial users that has a "not acceptable" discharge or has a "no discharge allowed" classification according to local, state, or federal regulations or guidelines will be issued a permit which describes that no wastewater may be discharged from this facility into the City's system. This user will be classified as an SIU, included in the City's list of SIUs, and regulated accordingly.

4.1 Industrial User Survey

4.1.1 Purpose

To identify and locate all possible industrial users (IUs) subject to the pretreatment program and identify the volume and character of pollutants discharged by the IUs to the POTW. Any compilation, index or inventory of IUs made under this paragraph shall be made available to the Regional Administrator or Director upon request; 40 CFR 403.8(f)(2)(i).

The Control Authority will utilize all avenues of its current policies relating to business license and development permits as well as observations obtained by the Control Authority and/or the public to identify potential SIUs, which might be subject to the City's pretreatment program. The industrial user survey will ensure that all non-domestic discharges to the public sewer system are identified and correctly classified. In addition, nondomestic users that discharge pollutants in violation of the City's Ordinance may be required to submit information to determine whether that source will become an SIU and therefore come under the direction of federal program requirements. Liquid Waste Transporters (LWTs) are not considered SIUs and are addressed in the City's Pretreatment Procedures Manual. A copy of the City's industrial user survey form (IUS) is found at the end of this document in the IU Survey appendix.

4.1.2 Procedure

The original survey, using an industrial waste survey (IWS) questionnaire, was conducted in 1982 pursuant to Section 403.8(f)(2) of the General Pretreatment Regulations. A master list of all SIUs discharging to the City treatment system was developed using the existing water and sewer user accounts. Over the years the use of the telephone directory, city business licenses, Chamber of Commerce List of Manufacturers, inspection and building permits, and the list of regulated and small quantity generators were added as sources to identify industrial users. SIUs are also identified via permit reapplications, citizen involvement, and onsite inspections. The master list also includes any nondomestic discharger that has been identified as or has reasonable potential to be a significant nondomestic user (SNDU). The Control Authority updates the master list annually in accordance with 40 CFR 403.12(i)(1). A copy of the master list is in the Pretreatment Procedures Manual.

To ensure that the industrial user master list is current:

- All permitted SIUs will be required to notify the Control Authority of changes in its operation or wastewater characteristics;
- New non-domestic dischargers (SIUs and SNDUs) will be added to the master list;
- The industrial user survey form is updated on an on-going basis and any updates will be submitted to ADEQ as part of the pretreatment annual report;
- The City Building Inspections Department, responsible for issuing all building permits, will notify the Control Authority of new industrial users that occupy new and existing structures;
- The Water Utility' Office Customer Service Department, responsible for all new water taps and service connections, will notify the Control Authority of all non-residential new users;
- The City Administration and Code Management and Inspection Departments will notify the Control Authority of all new business licenses; and
- Any individual who observes, knows or has reason to believe that any direct discharger to the system is or has the potential to impact the system will notify the Control Authority of the concern.

After the Control Authority has reviewed and updated the master list then the IUS is distributed to all SIUs and any SNDUs on the master list that the Control Authority selects. The survey is conducted on an ongoing basis but at least every three years in accordance with the EPA Guidance Manual for POTW Pretreatment Development, dated October 1983. The questions and comments used to gather information are reviewed and updated before each survey is conducted. The survey can be conducted by mailing, e-mailing



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

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

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 A R 0 0 4 3 3 9 7 11 12 0 6 0 4 2 6 17 18 I 19 S 20 2					
Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N	72 N	73 74 75 80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Pel-Freeze Arkansas, LLC 404 North Arkansas St. Rogers, AR	Entry Time /Date 4-26-06 3:50 PM	Permit Effective Date N/A
	Exit Time/Date 4-26-06 4:25 PM	Permit Expiration Date N/A

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Carolyn Wendel/Environmental Coordinator/479-636-4361	Other Facility Data
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Name, Address of Responsible Official/Title/Phone and Fax Number David Dubbell/President/479-636-4361 Pel-Freeze Arkansas, LLC 404 North Arkansas St. Rogers, AR 72756	Contacted Yes _____ No _____
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Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	Y	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

None.

Name(s) and Signature(s) of Inspector(s) Dale Washam Alison West	Agency/Office/Telephone/Fax ADEQ/Mammoth Springs/(870) 625-7477/(870)625-7699 ADEQ/Springdale/(479) 927-3257, Ext 12/(479) 927-3261	Date 5-3-06
------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------	----------------

Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
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POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Pel-Freeze Arkansas, LLC

Industry Contacts: Carolyn Wendel, Environmental Coordinator

Type of Industry: Meat Processing

Date of Visit: 4-26-06

- | | |
|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| 1. significant industrial user: | <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not determined |
| 2. pretreatment equipment or procedures? | <input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a |
| 3. pretreatment equipment maintained and operational? | <input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a |
| 4. hazardous waste generated or stored? | <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> n/a |
| 5. proper solid waste disposal? | <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> n/a |
| 6. solvent management/tto control | <input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> n/a |
| 7. suitable sampling location? | <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> n/a |
| 8. appropriate self-monitoring procedures/equipment? | <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> n/a |
| 9. adequate spill prevention? | <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> n/a |
| 10. industry familiar with limits and requirements? | <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> n/a |

Additional Comments:

Visit Conducted by (signature): Alison West and Dale Washam Date: 5-3-06
ACI:X-2430



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

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NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code			NPDES									yr/mo/day				Inspec. Type	Inspector		Fac Type										
1	N	2	5	3	A	R	0	0	4	3	3	9	7	11	12	0	6	0	4	2	6	17	18	I	19	S	20	2	
Remarks																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67						70	N					71	N	72	N	73			74										80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time /Date		Permit Effective Date	
Pel-Freeze Arkansas, LLC 404 North Arkansas St. Rogers, AR		4-26-06 3:50 PM		N/A	
POTW: City of Rogers		Exit Time/Date		Permit Expiration Date	
		4-26-06 4:25 PM		N/A	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
Carolyn Wendel/Environmental Coordinator/479-636-4361					
Name, Address of Responsible Official/Title/Phone and Fax Number				Contacted	
David Dubbell/President/479-636-4361				Yes _____ No _____	
Pel-Freeze Arkansas, LLC					
404 North Arkansas St.					
Rogers, AR 72756					

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	Y	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

None.

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Telephone/Fax		Date	
Dale Washam Alison West		ADEQ/Mammoth Springs/(870) 625-7477/(870)625-7699 ADEQ/Springdale/(479) 927-3257, Ext 12/(479) 927-3261		5-3-06	
Signature of Management QA Reviewer		Agency/Office/Phone and Fax Numbers		Date	

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Pel-Freeze Arkansas, LLC

Industry Contacts: Carolyn Wendel, Environmental Coordinator

Type of Industry: Meat Processing

Date of Visit: 4-26-06

- | | |
|-------------------------------------------------------|----------------------------------------------------|
| 1. significant industrial user: | <u>X</u> yes <u> </u> no <u> </u> not determined |
| 2. pretreatment equipment or procedures? | <u> </u> yes <u>X</u> no <u> </u> n/a |
| 3. pretreatment equipment maintained and operational? | <u> </u> yes <u>X</u> no <u> </u> n/a |
| 4. hazardous waste generated or stored? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 5. proper solid waste disposal? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 6. solvent management/tto control | <u> </u> yes <u> </u> no <u>X</u> n/a |
| 7. suitable sampling location? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 8. appropriate self-monitoring procedures/equipment? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 9. adequate spill prevention? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 10. industry familiar with limits and requirements? | <u>X</u> yes <u> </u> no <u> </u> n/a |

Additional Comments:

Visit Conducted by (signature): Alison West and Dale Washam Date: 5-3-06

ACI:X-2430



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
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NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 A R 0 0 4 3 3 9 7 11 12 0 6 0 4 2 6 17 18 I 19 S 20 2					
Remarks					
0 0 2 C					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Superior Industries International, Inc 1301 N. Dixieland Road Rogers, AR	Entry Time /Date 4-26-06 1:45 PM	Permit Effective Date N/A
	Exit Time/Date 4-26-06 3:35 PM	Permit Expiration Date N/A

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) John Fisher/Environmental Engineer/479-631-8037	Other Facility Data		
Name, Address of Responsible Official/Title/Phone and Fax Number John Fisher/Environmental Engineer/479-631-8037 1301 N. Dixieland Road Rogers, AR 72756	<table border="1"> <tr> <td>Contacted</td> </tr> <tr> <td>Yes X No</td> </tr> </table>	Contacted	Yes X No
Contacted			
Yes X No			

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	Y	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Contract lab does all sampling and analysis for the industry.

Name(s) and Signature(s) of Inspector(s) Dale Washam Alison West	Agency/Office/Telephone/Fax ADEQ/Mammoth Springs/(870) 625-7477/(870)625-7699 ADEQ/Springdale/(479) 927-3257, Ext 12/(479) 927-3261	Date 5-3-06
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Superior Industries International, Inc

Industry Contacts: John Fisher, Environmental Engineer

Type of Industry: Metal Finishing

Date of Visit: 4-26-06

- | | |
|-------------------------------------------------------|----------------------------------------------------|
| 1. significant industrial user: | <u>X</u> yes <u> </u> no <u> </u> not determined |
| 2. pretreatment equipment or procedures? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 3. pretreatment equipment maintained and operational? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 4. hazardous waste generated or stored? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 5. proper solid waste disposal? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 6. solvent management/tto control | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 7. suitable sampling location? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 8. appropriate self-monitoring procedures/equipment? | <u>X</u> yes <u> </u> no <u> </u> n/a |
| 9. adequate spill prevention? | <u>X</u> *yes <u> </u> no <u> </u> n/a |
| 10. industry familiar with limits and requirements? | <u>X</u> yes <u> </u> no <u> </u> n/a |

Additional Comments: **There were areas within the facility where there were not any spill prevention measures for chemical storage. It is strongly recommended that this be improved.**

Visit Conducted by (signature): Alison West and Dale Washam Date: 5-3-06
ACI:X-2430