ADEQ

A R K A N S A S
Department of Environmental Quality

NOV 1 2 2014

Jake Rice III
Manager, City Light and Water
P.O. Box 1289
Jonesboro, Arkansas 72403

Re: City Light and Water of Jonesboro (NPDES #AR0043401) Pretreatment Program Audit/ Municipal Pollution Prevention (P2) Assessment

Dear Mr. Rice,

Please find enclosed the finished report for the audit/assessment conducted September 16 - 18, 2014. The contents should be made available for review by appropriate CL&W officials. Discussions and an evaluation should be made concerning the required action and recommendations. Please respond in writing within thirty (30) days from the date on this correspondence with your corrective actions regarding the deficiency cited and any recommendations CL&W would deem necessary to act upon.

In this auditor's opinion, CL&W has a staff well qualified, knowledgeable and involved in the Program and its implementation. They should be lauded for their efforts. In this office's opinion Pollution Prevention (P2) efforts could be enhanced with minor adjustments within the day-to-day Pretreatment implementation practices.

It was a pleasure working with you and your staff and becoming more familiar with Jonesboro, its industries, Pretreatment and Pollution Prevention Programs.

Please feel free to contact this office with any questions at gilliam@adeq.state.ar.us or 501.682.0625.

Sincerely,

Allen Gilliam

Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist with Attachments

ec: Rudy Molina/EPA 6WQ-PO
Jason Bolenbaugh/NPDES Inspector Supervisor
Richard Healey/NPDES Enforcement Branch Manager

E-drive/NPDES/NPDES/Pretreatment\Reports

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT FOR

THE CITY OF JONESBORO, ARKANSAS

NPDES PERMIT #AR0043401

October 23, 2014

PREPARED BY: Allen Gilliam

ADEQ State Pretreatment Coordinator

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LIST OF ATTACHMENTS:

A) INTRODUCTION

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

With Pollution Prevention (P2) being integrated into Pretreatment Programs assessments of cities' P2 projects and programs will be made in conjunction with the audits.

The auditor performed an audit/assessment from September 16 through the 18th, 2014 of the Pretreatment Program implemented by City Water and Light (CWL) for the city of Jonesboro, Arkansas. Participants included:

Allen Gilliam	ADEQ / State Pretreatment Coordinator
Jay Earley	CWL / Pretreatment and Lab Coordinator
Myra Taylor	CWL / Lab & Pretreatment Supervisor
Jody Gibson	CWL / Pretreatment Specialist
Adam Saulsbury	CWL / Water & Wastewater Treatment Dept. Supervisor
Susan Merideth	CWL / Engineering Services Director (exit interview)

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Jonesboro'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 and/or reducing the introduction of potentially toxic pollutants from industrial discharges

* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements

* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof

City Water and Light (CWL) of Jonesboro is a Municipal Improvement District which owns and operates the utilities in the City of Jonesboro. CWL has the legal authority to implement and enforce the Pretreatment Program for the City. “City” may be used interchangeably with CWL in this report.
Jonesboro’s Pretreatment Program was originally approved on 11/1/83. Subsequent modifications to the Program included the development and adoption of technically based local limits on 5/15/90;

Jonesboro's Pretreatment Program was originally approved on 11/1/83. Subsequent modifications to the Program included the development and adoption of technically based local limits on 5/15/90; change of Cu and Zn mass local limits to concentration by resolution on 12/2/93. Another modification submittal, approved and incorporated into their NPDES permits on 5/11/99 included incorporation of an enforcement response plan, revisions to the pretreatment ordinance, program narrative changes and a re-evaluation of the MAHLs (maximum allowable headworks loadings).

The City submitted modifications to their Program to be consistent with the minimum required Streamlining provisions in the Federal Pretreatment Regulations. The Program modifications were approved by ADEQ Pretreatment personnel on 5/16/13 and incorporated into one (1) of the City's two (2) NPDES permits. This oversight will be corrected upon permit renewal of its tracking permit NPDES #AR0043401.

The City operates two POTWs. The Eastside plant (NPDES #AR0043401) has a design flow of 9.0 MGD with activated sludge, extended aeration with breakpoint chlorination and de-chlorination of wastewater. 2013 data indicates an average flow of ~7 MGD is discharged to Whiteman's Creek. Its effluent has shown both lethality and sub-lethality to both the fathead minnow and the water flea over the last three (3) years.

The Eastside plant receives ~1.48 MGD (~21.3%) from15 significant industrial users, seven (7) of which are categorical industrial users. CWL land applies ~1,256 dry metric tons of sludge per year from the East POTW.

The Westside plant (NPDES #AR0037907) has a design flow of 3 MGD which consists of primary sedimentation, first and second stage trickling filters, secondary clarification, chlorination, de-chlorination and post-aeration. 2013 data indicates the Westside discharges an average flow of ~1.48 MGD to an un-named tributary, then to Big Creek. Its effluent has shown sporadic lethal and sub-lethal effects on the water flea over the last three (3) years.

The Westside plant receives ~0.258 MGD (18.5%) from one (1) non-categorical significant industrial user. CWL land applies ~564 dry metric tons of sludge per year from the West POTW.

The audit/assessment consisted of informal discussions with the CWL's Pretreatment personnel, plant tours, examination of industrial user files, pretreatment records and site visits to three (3) of their significant industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachment(s) A.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by CWL. 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 CWL's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1) Under ***403.8(f)(1)(iii)(B)(3)***, "...individual control mechanisms must be enforceable and contain, at a minimum, the following conditions:...*(3)* Effluent limits, including Best Management Practices (BMP), based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;..."

During the file review, it was discovered BMPs (toxic organic management plans [TOMPs] and slug control plans [SCPs]) were not included as Pretreatment requirements in applicable permits. The City must include these BMP implementation and compliance reporting requirements in the appropriate section(s) of their applicable permits.

The "Effluent Limitations" page (see Attch. A-3b) must contain the BMPs such as the simple acronym "TOMP". These should be footnoted and further described in an appropriate part of that IU's permit. It was mentioned by CLW's personnel applicable permits will include language to describe the "IU's TOMP" and "SCP (slug control plan), approved by CWL on [date] and on file".

Certification statements for CLW's Metal Finishers are already being submitted semi-annually. Slug control plans' (SCPs) implementation certification statements would be considered an adequate semi-annual response from applicable SIUs they were implementing their submitted/approved SCPs.

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

1) Recommend including pollution prevention (P2) practices each IU has in place somewhere in their fact sheets (water/energy conservation, raw material regeneration [T&Bs' sulfuric acid, e.g.], source reduction, ISO 14001 certified, etc.).

2) Recommend, as resources allow, sending IU/business sector specific surveys tailored with questions specific to their wastewater generating processes (solvent distillation, Ag recovery at film processing businesses, chemicals discharged to the City's collection system from school's labs, etc.).

3) Recommend sending the hazardous waste notification in 40 CFR 403.12(p) to the generators on the ADEQ list provided to the City's Pretreatment reps. during the audit. Some of these small businesses move around the country often, may connect to the City one year and then close down the next. While it is not required to notify these "generators" but once, it is advisable to refer to ADEQ's haz waste generators list for the latest update and notify all at least once/5 years.

4) As part of the annual inspection the City should verify that all essential metal finishers' personnel are familiar with their Toxic Organic Management Plan (TOMP) and that their TOMP is current. It may be advisable to send CWL's Metal Finishers their TOMPs requesting they review them for

current accuracy, re-sign and re-date.

5) Strongly recommend to include the bypass prohibition per 40 CFR 403.17(d) in every SIU's permit conditions.

6) Strongly recommend to "beef up" IU inspections to include more narrative regarding: 1) identification of the sources of regulated wastewater; 2) flows from these processes (batch or continuous discharge?); 3) evaluation of process and pretreatment systems (rusting, leaking fittings, pools of unknown standing fluid, etc.) and the general appearance of the operation and maintenance of all appurtenances; 4) chemical/hazardous waste storage and handling procedures (how are the virgin chemicals delivered from the unloading dock to their appropriate stations, e.g.) and general manufacturing stations such as self-contained CNC machining stations (how are the machining lubricants and tramp oil disposed of, e.g.) and 5) evaluation of pollution prevention practices.

If this information is contained in the IU's application process/manufacturing operation's description, the inspections can just reference the schematics and process(es) description located in CWL's files. For the categorical IUs, this information is required in 40 CFR 403.12(b). And, the CWL's IU applications appear to ask for the same information from their permitted non-CIUs.

7) Strongly recommended to send CWL's SIUs their current schematics and process descriptions CWL has on file and require them to submit more comprehensive ones. Comprehensive wastewater schematics and process/manufacturing descriptions could not be produced in all the IU files reviewed. This auditor was fairly confused as to where wastewater flowed during two (2) of the IU site visits without understandable schematics in-hand. These updated schematics with concurrent process/manufacturing narrative details will be helpful to new employees and during any future regulatory audit/inspection of CWL's Pretreatment Program.

8) Recommend continuing outreach efforts to the public regarding proper disposal of pharmaceuticals, FOG, household hazardous waste and non-dispersibles (wet-wipes, "flushable diapers", e.g.).

9) Recommend finishing the IU sampling standard operating procedures for incorporation into CWL's Pretreatment Program as a non-substantial modification.

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

There are no Program modifications deemed necessary at this time.

****

CWL 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

A. GENERAL INFORMATION

Control Authority Name: Jonesboro City Water and Light (CWL) NPDES #: AR0043401
Mailing address: 400 East Monroe, P.O. Box 1289, 72403-1289

Permit Signatory: Jake Rice, III Title: CWL Manager

Telephone: 870.935.5581 FAX NUMBER: 870.930.3301

Pretreatment Contact: Jay Earley Title: Pretreatment & Lab Coordinator
Address: same
Telephone: 870.930.3392
e-mail: jearley@jonesborocwl.org

Pretreatment program approval date: 11/1/83

Dates of approval of any substantial modifications: 5/15/90, 12/2/93 & 7/31/13

Month Annual Pretreatment Report Due: December

Pretreatment Year Dates: Oct 1 - Sept 30 Date(s) of Audit: 9/16 - 9/18/14 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	State Pret. Coord./ADEQ	501.682.0625

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
*Jay Earley	Pretreatment & Lab Coordinator	870.930.3392
Myra Taylor	Laboratory Supervisor	870.930.3389
Adam Saulsbury	Water & Wastewater Treatment Dept. Supv.	870.930.3387
Jody Gibson	Pretreatment Specialist	870.935.5581 x-493

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	5/30/12	Satisfactory
PCI	5/2/13	Satisfactory

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 a asterisk or footnote that tells that there is more explanatory information and where it can be found.

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0043401	Eastside	3/1/12	2/28/17
AR0037907	Westside	7/1/11	6/30/16

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Eastside
Location Address: 5205 Ingels Rd.

Expiration Date of NPDES Permit: 2/28/17

Treatment Plant Wastewater Flow: Design- 9.0 MGD; Actual (Avg)- 6.98 MGD

Sewer System: 100 % # of SSOs due to grease blockages: 12

Industrial Contribution to this Treatment Plant

# of SIUs: 15 # of CIUs: 7
Industrial Flow (mgd): 1.48 Industrial Flow (%): 21.28 %

Level of Treatment	Type of Process(es):
Primary	
Secondary ✓	Extended aeration activated Sludge, clarification,
Tertiary	post aeration & aerobic sludge digestion

Method of Disinfection: Chlorination

Dechlorination ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Whiteman's Creek

Receiving Stream Classification: Segment 5A in St. Francis River Basin

Receiving Stream Use: secondary contact/raw water source for domestic, industrial and AG. supplies, propagation of desirable of fish & other aquatic life.

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

Method of Sludge Disposal:	Quantity of Sludge:
✓ Land Application	1256 dry metric tons/yr.
____ Incineration	____ dry tons/yr.
____ Monofill	____ dry tons/yr.
____ Mun. Solid Waste Landfill	____ dry tons/yr.
____ 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

SECTION I: GENERAL INFORMATION

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

YES NO

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

Issuing Authority: ADEQ (5142-W)
Effective Date: 11/1/12
Expiration Date: 10/30/17
List pollutants that are specified in current sludge permit:
All of CFR 503 pollutants and conditions

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?):Lethality to the water flea on 9/11, 10/11, 11/11, 1/14 & 2/14* and Sub-Lethal in 9/11, 10/11, 11/11, 6/13*, 1/14, 2/14*, 3,14 & 6/14. TIE screen conducted 2/12. "Close to triggering a TRE".

Disputed by CWL as failures.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1	1	
Biomonitoring		4		
TCLP			1	
Other:				

* 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.

There has not been any significant changes in headworks concentrations and effluent concentrations over the years; the headworks concentration for each pollutant remains close to domestic concentrations.

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)
Fecal (5/31/14)	Electrical outage caused a reset on their chlorinator.

YES NO

___ ✓ Has the treatment plant sludge violated the TCLP Test?

SECTION I: GENERAL INFORMATION

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Westside
Location Address: 1605 Willett Road

Expiration Date of NPDES Permit: 6/30/16

Treatment Plant Wastewater Flow: Design- 3 MGD; Actual (Avg)- 1.48 MGD

Sewer System: 100 % # of SSOs due to grease blockages: 2

Industrial Contribution to this Treatment Plant

# of SIUs: 1 (Riceland) # of CIUs: 0
Industrial Flow (mgd): 0.258 Industrial Flow (%): 18.5 %

Level of Treatment		Type of Process(es):
Primary	_____	Grit removal, primary sedimentation, 1st and 2nd
Secondary	✓	stage trickling filters, secondary sedimentation,
Tertiary	_____	chlorination and re-aeration

Method of Disinfection: chlorination

Dechlorination: ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Unnamed trib. Of Big Creek

Receiving Stream Classification: Segment 4B of the White River Basin

Receiving Stream Use: secondary contact rec, raw water source for domestic, industrial & AG water supplies, propagation of desirable species of aquatic life

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

Method of Sludge Disposal:		Quantity of Sludge:	
✓	Land Application	564	metric dry tons/yr.
_____	Incineration	_____	dry tons/yr.
_____	Monofill	_____	dry tons/yr.
_____	Mun. Solid Waste Landfill	_____	dry tons/yr.
_____	Public Distribution	_____	dry tons/yr.
_____	Lagoon Storage	_____	dry tons/yr.
_____	Other (specify)	_____	dry tons/yr.

List of toxic pollutant limits in NPDES permit: Conventionals & TRC

SECTION I: GENERAL INFORMATION

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

YES NO

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

Issuing Authority: ADEQ, (5105-W)
Issuance Date: 7/1/11
Expiration Date: 6/30/16

List pollutants that are specified in current sludge permit:
All of CFR 503 pollutants and conditions.

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?) Lethality to the water flea in 9/11, 10/11, 11/11, 7/12* & 5/14 and Sub-lethality in 9/11, 10/11, 11/11, 7/12* & 5/14. 2/3/12 TRE submittal results* were consistent with tox. due to ionic surfactants or polymers, but not definitive. No specific control mechanisms for removing or reducing toxicity". **CWL disagrees with TRE results and disputes the 2 WET failures.*

How many times were the following monitored during the past pretreatment year? (2013)

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1	1	
Biomonitoring		12		
TCLP			1	
Other:				

*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.
Stayed the same

YES NO N/A

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

___ ✓ ___ Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated	Cause(s)
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 Pretreatment 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. CWL's complete Pretreatment Program was revised to meet the minimum required revisions to the Streamlining revisions to 40 CFR 403.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permits*
7/31/13	Ord. # 12:009 adopted 3/22/12. See above for info regarding entire Program revisions.	7/9/13

*Modified permit language was only incorporated in the City's non-tracking permit # AR0037907 (Westside). Will correct upon re-issuance of both permits. Can't explain date differential. No documentation located for explanation.

2. Modifications in Progress:

Date Requested	Nature of Modification
None	

YES	NO	
	✓	Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:
✓		**Has the Control Authority notified the Approval Authority of all program** changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

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

Date of original Pretreatment Program approval: 11/1/83 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 3/22/12
Date of most recent Pretreatment Program modification approval: 7/31/13

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? *It's a "Purpose and Policy" statement in their Pret. Ord.

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:

___N/A__ Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

___N/A__ Have provisions been made for the incorporation of Pollution Prevention (P^2) policies by contributing jurisdictions?

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	N/A			
2.				
3.				
4.				

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

		Problems
___	Updating industrial waste survey	N/A
___	Notification of IUs	
___	Permit issuance	
___	Receipt and review of IU reports	
___	Inspection and sampling of IUs	
___	Assessment of IUs for P^2 activity	
___	Analysis of samples	
___	Enforcement	
___	Other: _____	

Briefly describe other problems: N/A

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

IU Name	Problem	NPDES Permit Violation Yes	No
N/A		___	___
		___	___

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

✓ ___ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *Last survey conducted in 12/11?*

✓* ___ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity? ***A question is asked about P^2 on the IU surveys.***

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

If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2
___ ✓ 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) Local and AR's Mfg Directory

How often is the survey to be updated? "At least 1/5 yrs"

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?
N/A		

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

a. 15 SIUs (As defined by the Control Authority) [ICIS]
b. 7 Categorical Industrial Users (CIUs) [ICIS]
c. 8 Noncategorical SIUs
d. 38 Other regulated nonsignificant IUs (Describe) Carwashes
53 TOTAL of a. + d.

YES NO

___ ✓ Has the POTW identified any IUs with Pollution Prevention opportunities?
✓* ___ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)]

If not, the Control Authority has defined "significant industrial user" to mean:
*City only chose required mods to the Streamlining SIU definition in 40 CFR 403.3

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

✓ ___ Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

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

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

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [ICIS/RIDE-SIUs w/o Control Mechanism] If there are any SIUs without current (unexpired) permits, please complete the information below:

IU NAME	PERMIT EXPIRATION DATE
N/A	

YES NO

___ ✓* Does the Control Authority accept trucked septage wastes?
** The Program now states "CWL reserves the right to accept septic tank waste from permitted haulers...at its sole discretion."*

___ ✓ 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:

The City has not issued control mechanisms for trucked wastes but has the equivalent procedures in place to control the waste.

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:

Pollutant	Limit
N/A	

Describe the discharge point(s) (including security procedures):
N/A

YES NO

✓ ___ Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?

✓ ___ Does the Control Authority have a control mechanism for regulating wastes from UST sites? *See Attch. A-1

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

Pollutants	Limits (mg/l)
BETX, FOG (EPH*), MTBE** & Pb	1.0, 50, 1.0 & 0.2

*Extractable petroleum hydrocarbon
**Methyl tertiary butyl ether

SECTION II: PROGRAM ANALYSIS AND PROFILE

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?

12/11 Date Notified Letter Method of Notification

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

✓ Federal Register
✓ Meetings, Training
✓ Government Agencies
✓ Journals, Newsletters
✓ Other Internet
___ Other

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? The City is waiting on a new TBLL eval from a consultant. *The basis for the below MAHLs are located in a Nov. 2007 document. They were not included in their Program upon submittal of their "approved Streamlined revised Program upon the advice of ADEQ's (now retired) Pret. Coordinator.

If yes, complete the information below:

Pollutant Changed	Old MAHLs (lbs/day)		11/07 MAHLs* (lbs/day)		Reason for Change
	West Plt	East Plt	West Plt	East Plt	
Arsenic	See below		0.58	1.16	Re-evaluation
Cadmium	"		0.18	0.62	"
Chromium	"		14.70	12.90	"
Copper	"		1.68	4.52	"
Cyanide	"		0.21	0.96	"
Lead	"		0.96	1.55	"
Mercury	"		0.00038	0.0031	"
Nickel	"		3.68	6.96	"
Silver	"		0.53	3.41	"
Zinc	"		4.75	20.93	"
Molybdenum	"		1.23	3.96	"
Selenium	"		0.17	0.60	"
Phenol	N/A		58.80	206.00	"
CBOD/BOD	N/A		4044.00	12853.00	"
TSS	N/A		2941.00	13368.00	"
Ammonia	N/A		2558.00	1285.00	"

*It's suspected these MAHLs will change upon receipt of the consultant's re-eval.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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?		MAHLs calc'd East/West POTWs Numerical Max's included in Program[1] (lb/d)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓			✓		✓	0.937 / 0.357
Cadmium (Cd)	✓			✓		✓	0.528 / 0.164
Chromium-Total	✓			✓		✓	1.451 / 0.901
Copper (Cu)	✓			✓		✓	7.683 / 0.827
Cyanide (CN)	✓			✓		✓	0.843 / 0.262
Lead (Pb)	✓			✓		✓	1.341 / 0.416
Mercury (Hg)	✓			?		?	0.002 / 0.0003
Molybdenum (Mo)	✓			✓		✓	2.810 / 2.702
Nickel (Ni)	✓			✓		✓	5.620 / 2.14
Selenium (Se)	✓			✓		✓	1.124 / 0.126
Silver (Ag)	✓			✓		✓	1.202 / 0.139
Zinc (Zn)	✓			✓		✓	13.060 / 4.053

[1]*Approved Program submitted Nov 97; Appendix K, Attachment No. 3 & 4, Table 3*

YES NO

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

POLLUTANT	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
Quaternary ammonia chlorides	✓		✓*			*	1.35
			*This pollutant's "local limit" was developed by a consultant for one particular industry (Nice-Pak) using jar testing for inhibition.				

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

	TYPE OF ALLOCATION[1]		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)			
Cadmium (Cd)			
Chromium-Total			
Copper (Cu)			
Cyanide (CN)			
Lead (Pb)	Not mentioned in current "approved" Program.		
Mercury (Hg)			
Molybdenum (Mo)			
Nickel (Ni)			
Selenium (Se)			
Silver (Ag)			
Zinc (Zn)			
BOD5		✓	
TSS		✓	

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?
Separate MAHLs for each POTW

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1/year	1/year	
Other SIUs	"	1/year	
Sampling:			
CIUs	~1/month	1/year	
Other SIUs	~16-30/month	1/year	For accurate surcharging (in most cases)
Reporting:			
CIUs	City does	2/year	Metal Finishers certify
Other SIUs	monitoring	2/year	their TOMPs semi-annually
Self-Monitoring:			
CIUs	"	2/year	N/A
Other SIUs	"	2/year	N/A

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

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected. N/A

SECTION II: PROGRAM ANALYSIS AND PROFILE

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
✓	___	If requested?.
___N/A__		To verify IU self-monitoring results?

Provide the following information regarding pollutant analyses done by the POTW:

	*Analytical Method	Name of Laboratory
Metals	ICP	in-house
Cyanide	spectrophotometric	ETC
Organics	GC/MS	"
Other	WET	ASU Ecotox

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

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

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe:
POTW relies on the State's and EPA's certification programs
in-house rinsate checks are done on sampling equipment.
POTW now also does blanks, spikes and "dups" on de-i water

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

5-6 dys Conventionals
5 dys Metals
~2 wks Organics

✓* ___ Is there an established protocol clearly detailing sampling location and procedures? **They have established an SOP for equipment cleaning and *are almost complete with sampling SOPs for each IU.*

___ ✓ Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: N/A

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

YES	NO	
✓	___	Scheduled compliance monitoring
✓	___	Unscheduled compliance monitoring
✓	___	Demand monitoring for IU compliance
✓*	___	IU self-monitoring
___	___	Other:_____

* For Nice-Pak and their UST clean-up w.w.

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

I. ENFORCEMENT

YES NO

✓ ___ Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(v)]

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

YES NO

✓ ___ Describe how the Control Authority will investigate instances of noncompliance

✓ ___ Describe the Control Authority's types of escalating enforcement responses and the periods for each response

✓ ___ Identify by Title the Official(s) responsible for implementing each type of enforcement response

✓ ___ Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

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

✓ 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 $ 1000 /day/violation

___ Imprisonment
✓ Termination of discharge (including water service)
✓ Other: Performance bonds & liability insurance

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: City conducts monitoring for all IUs except for 2 "IUs". The normal sampling schedule for all SIUs is 30 days or less. *UST clean-up site and Nice-Pak is responsible for their sampling and reporting.

✓* ___ 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?

SECTION II: PROGRAM ANALYSIS AND PROFILE

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? No
N/A					

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

#	%	
0	0	Pretreatment Standards [ICIS-SNC Pret Std] (Local Limits/Cat Stds)
0	0	Self-monitoring requirements [ICIS-SNC Reporting]
0	0	Reporting requirements [ICIS-SNC Reporting]
0	0	Pretreatment compliance schedule [ICIS-SNC Pret Sch]

0 How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [ICIS/RIDE-SIUS Not Insp/Sampled]

YES	NO	
	✓	Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples.

Has the Control Authority experienced any of the following:

YES	NO		EXPLAIN and ID Industrial User
	✓	Interference [ICIS/RIDE].	
	✓	Pass through [ICIS/RIDE].	
	✓	Fire or explosions? (incl. flash point viol.)	
	✓	Corrosive structural damage? (incl. pH <5.0).	
	✓	Flow obstructions?	
	✓	Excessive flow or pollutant concentrations?	
	✓	Heat problems?	
	✓	Interference due to oil or grease?	
	✓	Toxic fumes?	
	✓	Illicit dumping of hauled wastes?	

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount	
Civil	0	$ 0	
Administrative	0	$ 0	
Total	0	$ 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
✓	___	hard copy
___	___	OTHER: _____

Are the following files computerized:

YES NO

✓ ___ Control Mechanism Issuance
✓ ___ Inspection and Sampling schedule
✓ ___ Monitoring Data
✓ ___ IU Compliance Status Tracking
___ ___ Other: _____

Can IU monitoring data can be retrieved by:

✓ ___ Industry name
___ ✓ Pollutant type
✓ ___ Industrial category or type
___ ✓ SIC Code
✓ ___ IU discharge volume
___ ✓ Geographic location
✓ ___ Receiving treatment plant (i.e.if > one plant in the system)
___ ___ Other (specify) _____

* ___ Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)] **City has no formal process but will accept confidential documents. Only the current approved Pretreatment Ordinance addresses confidential information.*

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

CWL depends on staff to keep information confidential.

___ ✓ Are there significant public or community issues impacting the POTW's pretreatment program? If yes, please explain: _____
✓ ___ Are all records maintained for at least 3 years?

SECTION II: PROGRAM ANALYSIS AND PROFILE

K. RESOURCES

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

~ 4 FTEs

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:

N/A

		Percent of Total Funding
✓	CWL general operating fund	30
✓	IU permit fees (back to G.O.F.)	
✓	monitoring charges "	35
✓	industry surcharges "	35
___	other (describe) ___	
	Total	100%

✓ ___ Is funding expected to continue near the current level? If no, will it:
Increase ____ or Decrease ____
If no, describe the nature of the changes:
n/a

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

YES	NO		If no, explain
✓	___	Legal assistance	
✓	___	Permitting	
✓	___	IU inspections	
✓	___	Sample collection	
✓	___	Sample analyses	
✓	___	Data analysis, review and response	
✓	___	Enforcement	
✓	___	Administration (inc. record keeping /data management)	

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	18 ISCO automatic samplers (and spares),ph and flow meters
✓	___	Safety equipment	Standard list
✓	___	Vehicles	Van, truck and car
✓	___	Analytical equipment	ICP and conventionals analytical equipment

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.): CLW has incorporated questions concerning P2 in the IU surveys, IU permit applications and IU inspection forms. CLW has worked with the Universities of Memphis and Arkansas to provide energy/water conservation audits for multiple IUs. CLW has invited their IU contacts to and offered to pay for IU P2 workshops. All information regarding P2 workshops and webinars is passed on to their IU contacts. CLW encourages their IUs to visit P2 websites and apply for P2 awards. CLW personnel have attended a P2 training class offered by the EPA Region 6 "Zero Waste Networkshop".

2. Has the source of any toxic pollutants been identified?
If yes, what was found?
Nice-Pak discharges Quaternary Ammonium chlorides. CLW has developed a IU specific "local limit" for this industry.

3. Has the POTW implemented any kind of public education program? If yes, describe:
CLW has given guided tours of the treatment plant to high school and college students.

4. Does the POTW have any pollution prevention success stories for industrial users documented? *Yes . If yes, please attach. ***Frito Lay was a member of the EPA Performance Track and was also the winner of the 2010 ADEQ Envy Award.***

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
No

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants?
If yes, which of the "Guides to Pollution Prevention" were used? *P2 guidance manuals were handed out in the past to applicable IUs*

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name: Thomas & Betts File/ID No: 9502
Industry Address: 5601 E. Highland Rd.
Industry Description: Galvanizing of tubing and Zn plating of electrical fittings
Industrial Category: Metal Finisher 40 CFR 433 SIC/NAICS Codes: 3643/335932
Avg. Total Flow (gpd): ? Avg. Process Flow (gpd): 50,000

Industry visited during audit: YES

Comments: The flow from the galvanizing line is so minute, the CWF does not affect appreciably the Metal Finishing limits, so the CFR 420 pickling wastewater was not being considered in their final limits. CWL has justification for this in IU's file.

FILE #: 2 Industry Name: Hytrol Conveyor File/ID No: 8413
Industry Address: 2020 Hytrol Dr.
Industry Description: Mfg of conveyor systems
Industrial Category: Metal Finisher 40 CFR 433 SIC/NAICS Codes: 3535/333923
Avg. Total Flow (gpd): ? Avg. Process Flow (gpd) ~36,000

Industry visited during audit: NO

Comments: Time constraints did not allow a site visit at this facility

FILE #: 3 Industry Name: G&K Services File/ID No: 9701
Industry Address: 3235 E. Matthews
Industry Description: Industrial Laundry
Industrial Category: N/A 40 CFR N/A SIC/NAICS Codes: 7218/812332
Avg. Total Flow (gpd): ? Avg. Process Flow (gpd): 48,000

Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name: Nice-Pak Products File/ID No: 108-11
Industry Address: 1 Nice Pak Rd.
Industry Description: Mfg. various types of "wet wipes"
Industrial Category: N/A 40 CFR N/A SIC/NAICS Codes: 2844/325620
Ave. Total Flow (gpd): ? Avg. Process Flow (gpd): 72,000

Industry visited during audit: *YES*

Comments:

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

Industry visited during audit:
Comments: _____

SECTION III: INDUSTRIAL USER FILE REVIEW

Industrial User Characterization

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

B. Control Mechanism

1. Does the file contain an application for a control mechanism? *(See Attch A-2 for example)*	✓	✓	✓	✓	
If yes, what is the application date?	2/10	3/12	6/12	12/08	
Does it ask for Pollution Prevention information?	✓	✓	✓	✓	
2. Does the file contain a Permit? *(See Attch A-3 for example)*	✓	✓	✓	✓	
Permit Expiration Date?	5/15	11/17	11/17	5/16	
Is a fact sheet included? *(See Attch A-4 for example)*	✓	✓	✓	✓	
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	✓	✓	✓	✓	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	1	✓	✓	✓	
e. Appropriate self-monitoring requirements?	2	2	2	3	
f. Sampling frequency?	✓	✓	✓	✓	

Comments: 1) This IU's Metal Finishing monthly avg was reduced to 0.80 mg/l per a 12/94 consent agreement based on a calculated "local limit"; 2) CWL does all monitoring; 3) This IU does its own monitoring.

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	File 5
g. Sampling locations?	✓	✓	✓	✓	
h. Requirement for flow monitoring?	✓	✓	✓	✓	
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	
j. Applicable IU reporting requirements?	✓	✓	✓	✓	
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	
Records retention?	✓	✓	✓	✓	
Civil and Criminal Penalty provisions?	✓	✓	✓	✓	
Revocation of permit? *("Termination of discharge")*	✓	✓	✓	✓	
l. Compliance schedules/ progress reports	n/a	n/a	n/a	n/a	
m. General/Specific Prohibitions?	✓	✓	✓	✓	
n. Where technologically and economically achievable, are P^2 aspect included?	no	no	no	no	

C. Application of Standards

1. Has the IU been properly categorized?	✓	✓	✓	✓	
2. Were both Categorical Standards, Local Limits and BMPs properly applied?	1,3	1,3	✓	✓	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	✓	✓	✓	✓	
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	2	n/a	n/a	n/a	
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	2	n/a	n/a	n/a	

Comments: 1) Refer to previous page's comment on "consent agreement"; 2) See fact sheet (Attch 4d-g) calcs showing CFR 420's wastestream "insignificant"/not taken into account; 3) These Metal Finishers' TOMPs (BMPs) need to be included on the limits' page and reporting requirements further explained in narrative portion of each permit.

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	File 5
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	
7. Is the Control Authority applying a bypass provision to this IU?	no	no	no	no	
D. Compliance Monitoring					
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	✓	✓	n/a	n/a	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Timed	Timed	Timed	Timed	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	File 5
Inspections *(See Attch. A-5 for example)*					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	
b. Date of last Inspection	8/14	8/14	8/14	7/14	
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	1	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	2	2	2	2	
f. Evaluation of pretreatment facilities?	2	n/a	2	2	
g. Evaluation of self-monitoring equipment and techniques?	n/a	n/a	n/a	n/a	
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	3	3	3	3	
i. Manufacturing facilities?	2	2	2	2	
j. Chemical handling and storage procedures?	2	2	2	2	
k. Chemical spill prevention areas?	✓	✓	✓	✓	
l. Hazardous waste storage areas and handling procedures?	2	n/a	2	2	

Comments: 1) See 2nd comment on page 22 above; 2) These areas of CWL's inspections are answered very vaguely or w/"yes" or "no". More detailed narrative is needed; 3) It appears CWL required all of their IUs to develop a slug control plan whether there was a slug discharge potential or not.

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	File 5
m. Sampling procedures?	n/a	n/a	n/a	n/a	
n. Laboratory procedures?	n/a	n/a	n/a	n/a	
o. Monitoring records?	n/a	n/a	n/a	n/a	
p. Evaluation of Pollution Prevention opportunities?	✓	✓	✓	✓	
q. Control Authority inspector signature?	✓	✓	✓	✓	
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	1	1	1	✓	
11. Does the file include: a. BMR?	Arch'd	Arch'd	n/a	n/a	
b. 90-Day Report?	"	"	n/a	n/a	
c. All periodic reports?	n/a	n/a	n/a	✓	
d. Compliance schedule reports?	n/a	n/a	n/a	n/a	
12. Did the IU report on all required parameters?	n/a	n/a	n/a	✓	
13. Did the IU comply with the required sampling frequency(s)?	n/a	n/a	n/a	✓	
14. Did the IU report flow?	no	no	no	✓	
15. Did the IU comply with the required reporting frequency(s)?	2	2	n/a	✓	
16. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	n/a	n/a	
17. Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	
18. Has the IU developed a Slug Control and Prevention Plan?	✓	✓	✓	✓	

Comments: 1) CWL does monitoring for 3 of the 4 reviewed; 2) Metal Finishers semi-annually certify their TOMPs.

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	File 5
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	--	--	--	--	
b. Did POTW respond to the spill?	--	--	--	--	

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	n/a	n/a	n/a	n/a	
b. IU self-monitoring results?	n/a	n/a	n/a	n/a	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	n/a	✓	n/a	n/a	
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	0	0	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	n/a	n/a	n/a	n/a	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	n/a	n/a	n/a	
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	
6. Was the IU notified of all violations?	n/a	n/a	n/a	n/a	
7. Was follow-up enforcement action taken by the Control Authority?	N/A	N/A	✓	✓	
8. Did the Control Authority follow its approved ERP?	N/A	N/A	✓	✓	

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: Jonesboro City Water & Light NPDES #: AR0043401

Date of Audit: 9/16 - 9/18/14 Date entered into QNCR: 10/23/14
(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
NO	Other violations of concern	II

SIGNIFICANT NONCOMPLIANCE (SNC)

NO Is the Control Authority in SNC for violation of any Level I criterion.

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

SECTION III: INDUSTRIAL USER FILE REVIEW

	File 1	File 2	File 3	File 4	File 5
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	n/a	n/a	n/a	n/a	
10. Is there a compliance schedule?	no	no	no	no	
If yes:					
11. Were there any compliance schedule violations?	n/a	n/a	n/a	n/a	
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	n/a	n/a	n/a	n/a	
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	
b. TRC	✓	✓	✓	✓	
c. Pass through/Interference	✓	✓	✓	✓	
d. Spill/slug loads	✓	✓	✓	✓	
e. Reporting	✓	✓	✓	✓	
f. Compliance schedule	✓	✓	✓	✓	
g. others (specify)	--	--	--	--	
13. Was the SIU published for SNC?	n/a	n/a	n/a	n/a	
Date of publication.	--	--	--	-	

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Jonesboro NPDES #: AR0043401

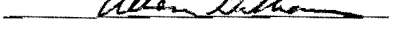
Name, address and phone number of industry:
Thomas and Betts Corp., 5601 Highfield Dr., 870.819.3708
Type of industry: Mfg. of electrical fittings
Date/Time of visit: 9/17/14 / 11:00 a.m.

Industry contact(s): Darryl Worsham, Health, Safety & Env. Mgr/ John Shatzer, Human Resources Mgr/Donna Bell, Plating Zone Mgr & Danny Hobbs, Wastewater Operator

	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?			n/a
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Additional comments: This facility has not changed operations substantially in recent years. Raw material includes Al, Fe castings and steel pipe for producing galvanized pipe, PVC coated conduit pipe, "elbows", conduit fittings and some Zn plated fittings and pipe. The zinc plating lines do use some usable spent chems for make up water in the proper tank for pollution prevention (P2). They have two separate automated Zn plating lines, one "rack" line (with 19 process/rinse tanks), the other a "barrel" line. All tanks are labeled (generically) with the chems that are in them. The rinse waters from these plating lines are sent to pretreatment by overhead pipe. The in-ground

Visit conducted by: Gilliam/Earley/Gibson/Saulsbury 9/17/14



(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Jonesboro NPDES #: AR0043401

Industry name: Thomas and Betts

grated drain is for emergency spill containment. Chemical storage for these two plating lines are kept close to the lines themselves on elevated spill pallets. The area around these two lines appeared clean and uncluttered. The various chemicals/ tanks used in the plating process will be provided to the City in a more descriptive w.w. flow schematic. The site visit did not include much on the PVC coating operations. The facility's air permit does indicate "sulfuric acid the CNC machining stations are self-contained with the spent coolants and tramp oils sent off-site for disposal. Facility conducts some galvanizing using sulfuric acid pickling, hot dip coating (Zn) followed by a quench tank. They conduct sulfuric acid regeneration and use vacuum hoods over all tanks in this area. The hoods are connected to a huge wet scrubber to reduce fumes. The area operator indicated the wet scrubber water is not reused in any of the galvanizing line's tanks. The quench tank's ~2,000 gallon water is batch discharged to the City once per week. It was earlier determined by the City this amount of CFR 420 wastewater did not significantly affect the CFR 433's limits via the CWF. All rinse waters are sent to pretreatment which consists of a typical chemical precipitation system. The system looked in good working order as the floc looked good and what was flowing over the (Lamella) clarifier weirs was floc free. They also send the treated w.w. through two cartridge filters with a "small" micron paper-like disks. Sludge is sent thru a JWI filter press and sent to the local landfill.

Visit conducted by: Gilliam/Earley/Gibson/Saulsbury 9/17/14

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Jonesboro NPDES #: AR0043401

Name, address and phone number of industry:

G & K Services, 3235 E. Matthews, 870.935.4999

Type of industry: Industrial Laundry

Date/Time of visit: 9/17/14 / 2:25 p.m.

Industry contact(s): Jeson Lamb and Craig, Maintenance Supv.

	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?			n/a
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Additional comments:

Facility is an industrial laundry and has not changed operations substantially in years. It was estimated they launder approximately 1% of "inkers" per year. Other linens washed/dried are shop towels, mop heads, floor mats and uniforms.

Facility rep could not think of any different operations they had ongoing than any other competitors.

They use a typical detergent and emulsifier for their washing operations. Bleach is also used for some linens. These are the basic chems the facility has on site.

Visit conducted by: Gilliam/Earley/Gibson/Saulsbury

Date: 9/17/14

Allen Gibson

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Jonesboro NPDES #: AR0043401

Industry name: G & K Services

Additional comments:

The detergent, emulsifiers and bleach are fed to the washers automatically by computer as needed for each washer. Spent washwater is sent through a vibratory/inclined lint remover and then sent back to one of their two SS conical bottom EQ tanks. They do have an emergency back-up pump. They use a heat exchanger for pre-heating city water in preparation for the washing operations. Further treatment consists of addition of a coagulant and a flocculant in the either of the EQ tanks to aid in settling. The w.w. is then sent to the DAF unit where the solids are sent thru a filter press with the cake dropped directly down into a bin which is then sent to the landfill with the removed lint. Supernatant is sent back to one of the EQ tanks. Pretreatment equipment appeared to be in good working order.

Visit conducted by: Gilliam/Earley/Gibson/Saulsbury

Date: 9/17/14

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Jonesboro NPDES #: AR0043401

Name, address and phone number of industry:

Nice-Pak Products, One Nice Pak Road, 72404, 870.935.0469

Type of industry: Produces a variety of wet-wipes

Date/Time of visit: 0/18/14 / 11:20 a.m.

Industry contact(s): Stan Lichucki, QA Mgr/Brad Zenko, Sr. Director of Operations

	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?			n/a
8. Suitable sampling location?	✓		
9. Appropriate self-monitoring procedures/equipment?			n/a
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Additional comments: Facility produces baby wipes, cosmetic wipes and hard surface wipes from non-woven substrates containing cellulosic or synthetic fibers. Final products are packaged in flow packs or tubs and sent to numerous customers across North America and overseas. A water balance was provided to CWL. They have 3 main production lines.

Visit conducted by: Gilliam/Earley/Gibson/Saulsbury

Allen Gilliam Date: 9/18/14

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Jonesboro NPDES #: AR0043401

Industry name: Nice-Pak Products

Additional comments: Non-woven substrates (some synthetics and naturally derived sustainable mtrl) are folded, wetted, stacked and cut then packaged in various formulations, counts and configurations. All processing is highly automated. W.W. generated during this process includes liquid that may drip from the products into catch pans during normal operations, change-overs and sanitation. This waste liquid can't be recycled and is collected into sumps that is discharged to holding tanks before discharge to the City. The waste system includes controls to determine if discharge to the City is allowed. The Hard Surface waste tank system is programmed and controlled to allow no more than permitted quantities of actives (local limit for quaternary ammonium chloride = 1.35 lb/hr) in the w.w. to be batch discharged to the City. The Hard Surface and Cosmetic lines are separated by hard piping to each system. Raw chems are received/stored in the controlled compounding self-contained area to make the various formulations. No bulk raw chem storage tanks are in use. Batch formulations are mixed/stored/consumed within the containment areas that are connected to the main sump. This sump can only be discharged manually to Pretreatment after verification of normal process conditions. Some of the liquid formulation(s) after batching are diluted/sent to the converting process to be used in making the products. Purified water ("softened", sent thru R/O filters & continuous electronic De-I) is a significant constituent of the liquid formulations. The R/O reject is discharge directly to the City. The facilities process and outside areas were very clean and uncluttered. The facility rep was familiar with their permit provisions and the CWL reps were familiar with facility's ops. Appears to be no slug discharge potential and the slope of the floor around the tanks can hold 2.5 times the volume of the largest tank.

Visit conducted by: Gilliam/Earley/Gibson/Saulsbury

Allen D. Gibson Date: 9/18/14

(signature of auditor conducting visit)

Attachment A-1

Owned by the Citizens of Jonesboro

COPY

The Industrial Wastes Discharge Permit
Permit Number: 112-01

In compliance with the provisions and conditions of the City of Jonesboro Ordinance Number 3126, and with any applicable provisions of Federal or State of Arkansas laws or regulations, and with all applicable rules and regulations of City Water & Light Plant of the City of Jonesboro, Arkansas ("CWL"):

SCS Environmental Group, LLC
Site Address:
3915 East Highland Drive
Jonesboro, Arkansas 72401

Mailing Address:
SCS Environmental Group, LLC
114 Bailey Drive
Olive Branch, MS 38654

Hereby known as the Permittee, is authorized to discharge industrial wastes from activities classified by SIC Code 8999 or NAIC code 541620 from the premises located at the above address into CWL's Wastewater Collection System in accordance with the application for permit submitted to CWL on October 27, 2008, effluent limitations, monitoring requirements, and conditions set forth in Parts I, II, III, and IV hereof.

This permit shall become effective February 9, 2012

This permit and its authorization to discharge shall expire at midnight, February 8, 2017.

Signed this 9th day of February 2012

Jake Rice, III, P.E.
General Operations Director

Part I. Effluent Limitations

Total Wastewater Flows		
Average Daily Total Wastewater Flow	N/A	GPD
Maximum Daily Total Wastewater Flow	N/A	GPD
Process Wastewater Flows		
Average Daily Process Wastewater Flow	662	GPD
Maximum Daily Process Wastewater Flow	662	GPD

Pollutant Discharge Limitations for Process Wastewater:
As an industry discharging process wastewater regulated by the City of Jonesboro Ordinance Number 3126, and with any other applicable provisions of Federal or State of Arkansas law or regulation, and with any applicable Jonesboro City Water and Light regulation, wastewater is treated groundwater discharged continuously from this outfall.

A site plan showing the location of the remediation system and the approved sewer discharge point are required for permit compliance (See Appendix A).

This outfall shall be monitored for the following listed pollutants:

	Maximum		Sample	
Parameter, unit	Any one day	Monthly Average	Frequency {2}	Type
Flow, GPD {3}	Report only	Report only	Daily	N/A
pH, SU	6-11.5 {1}	N/A	quarterly	grab
Total BETX*	1.0 mg/L	NA	quarterly	grab
FOG (EPH**)	50 mg/L	NA	quarterly	grab
MTBE***	1.0 mg/L	N/A	quarterly	grab
Lead	0.20 mg/L	N/A	quarterly	grab

*BETX – Benzene, Toluene, Ethyl Benzene, and Xylenes
**EPH – Extractable petroleum hydrocarbon
***MTBE – Methyl tertiary butyl ether

{1} Local Sewer Use Ordinance

{2} CWL will use its discretion pertaining to sampling frequency in accordance to Part 2, #5 of the Industrial Waste Discharge Permit.

{3} Flow is based on the total flow measured by SCS flow meter.

Part II. Monitoring Requirements

1. The Permittee shall, within 30 days of the effective date of this permit, provide a sampling access facility on their process wastestreams at a location before it has mixed with other wastestreams from its premises. The location, equipment, and configuration contained in the sampling access facility shall be as approved by the CWL Laboratory Supervisor.

2. Permittee shall perform sampling and analysis of industrial wastes discharged into the CWL Wastewater Collection System. A Laboratory certified for each permitted analyte by the Arkansas Department of Environmental Quality (ADEQ) must be used. Analyses shall be in accordance with 40 CFR 136, as amended.

3. The Permittee shall pay all costs associated with the required sampling and analysis.

4. CWL may, upon its request, obtain a portion of the samples for analyses from the Permittee.

5. The frequency of sampling shall be as indicated in Part I (above) unless the results of monitoring indicate the need, as determined by CWL, for more or less frequent sampling. Effluent grab samples are to be collected weekly for the first four (4) weeks, then monthly for the next ten (10) months, and then quarterly for the duration of the permit. The frequency of compliance monitoring for categorical or significant industries shall be in no case less than that required by 40 CFR 403.12 (twice per year). Samples shall be 24-hr composite or grab samples in accordance with 40 CFR 136.

    a) A report shall be submitted monthly for the first eleven (11) months and quarterly thereafter.
    b) This report is due by the 15th of the each month. The first report is due on the 15th of the month following self-monitoring.
    c) The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analyses were performed during the calendar month preceding the submission of each report including measured maximum and average daily flows.
    d) This report shall be sent to: CWL Pretreatment Coordinator; Attn: Adam Saulsbury; 400 E. Monroe; P. O. Box 1289; Jonesboro, AR 72401

6. The Permittee shall maintain daily records of total process wastewater flows discharged to the CWL Wastewater Collection System. Records of the daily process wastewater discharged to the CWL Wastewater Collection System shall be reported upon request, in writing to the CWL Manager or to a designated representative.

7. The Permittee shall maintain records of all information resulting from any monitoring activity for a period of three years and shall make such records available for inspection and copying by CWL. This period of retention shall be extended as requested by CWL.

8. Pursuant to the requirements of paragraph 1 above, the Permittee sampling point shall be Outfall Number 001. The Permittee's effluent shall consist of pretreated process wastewater. The sampling

A-1c

Attachment A-2

Permit Application for the Discharge of Industrial/Commercial Wastewater to the Jonesboro CWL Wastewater Collection System

CWL use only:
Date Permit Application mailed to the industrial user: __/__/__
Date completed Permit Application received by CWL: 2/3/2010 ay

Please complete the following:

COPY

Check one:

(✓) Permit application for renewal of an existing permit.
Current Permit Number: 95-02
Current permit Expiration Date: 05/31/10

( ) Application for a new permit

1. Firm Name: Thomas and Betts Corporation

Mailing Address: 5601 East Highland Drive
City, ZIP Code: Jonesboro, AR 72401

Facility Address: Same As Above
City, ZIP Code:

#1 Contact Person: Rickey Reynolds, Environmental
Telephone Number: 870-935-2559 Ext. 269
Fax Number: 870-972-4709
Web Site Address: Charles.ReynoldsETNB.com

#2 Contact Person: Daniel Seidel, Plant Manager
Telephone Number: 870-935-2659
Fax Number: 870-972-4709
Web Site Address: Daniel.SeidelETNB.com

Corporate Contact Person: OM Chopra
Telephone Number: 1-901-252-5000 Ext. 5937
Fax Number: 1-901-252-1340
Web Site Address: OM.ChopraETNB.com
Mailing Address: 8155 TNB Blvd.
Memphis TN 38125

2. Standard Industrial Classification Code Number: 3643

North American Industrial Classification Code Number: 335932

3. Quantity of Wastewater (Estimate if new facility):

Wastewater Origination	Flows (gallons per day): Current CWL Records	Self-Monitoring or Estimate
Total (process and sanitary)		
Average Daily Wastewater Flow Rate	125,000 GPD	
Maximum Daily Wastewater Flow Rate	135,000 GPD	
Process only Wastestreams		
Average Daily Process Wastewater Flow Rate	90,000 GPD	
Maximum Daily Process Wastewater Flow Rate	100,000 GPD	

List any periodic or seasonal variations:
NONE

Wastewater Parameter Concentrations:

(Based on last 12 month Average)

Parameter	Units		TBLL or Ordinance Limit	Monitoring results of: Existing Permits CWL	Estimates*
BOD5	mg/L	30 Day Average	250	—	
		1 Day Maximum	250		
TSS	mg/L	30 Day Average	250	—	
		1 Day Maximum	250		
pH	S/U	1 Day Maximum	6.0-11.5	8.33 s/u	
FOG	mg/L	1 Day Maximum	100	4.66 mg/L	
Cyanide, Total	mg/L	30 Day Average	0.65	.001 mg/L	
		1 Day Maximum	1.20		
Cadmium, Total	mg/L	30 Day Average	0.15	.007 mg/L	
		1 Day Maximum	0.69		

Molybdenum, T.	mg/L	30 Day Average	EPA		
		1 Day Maximum	EPA		

Nickel, Total	mg/L	30 Day Average	1.03	.044 mg/L	
		1 Day Maximum	3.98		
Selenium, Total	mg/L	30 Day Average	EPA	—	
		1 Day Maximum	EPA		
Silver, Total	mg/L	30 Day Average	0.24	.002 mg/L	
		1 Day Maximum	0.43		
Zinc, Total	mg/L	30 Day Average	1.48	.243 mg/L	
		1 Day Maximum	2.61		

*Estimate based upon historical data or projections for new facilities based upon comparable existing technology.

EPA: EPA categorical limits apply

EPA Regulated Priority Pollutants:

List any Priority Pollutants in the spaces provided that are known to be present in the wastestream of processes found at your facility. Refer to your facilities MSDS for further information.

01. Acenaphthene
02. Acrolein
03. Acrylonitrile
04. Aldrin/Dieldrin
05. Antimony and compounds (*compounds* include organic and inorganic.)
06. Arsenic and compounds
07. Asbestos
08. Benzene
09. Benzidine
10. Beryllium and compounds
11. Cadmium and compounds
12. Carbon tetrachloride
13. Chlordane (technical mixture and metabolites)
14. Chlorinated benzenes (other than di-chlorobenzenes)
15. Chlorinated ethanes (including 1,2-di-chloroethane, 1,1,1-trichloroethane, and hexachloroethane)
16. Chloroalkyl ethers (chloroethyl and mixed ethers)
17. Chlorinated naphthalene
18. Chlorinated phenols (other than listed elsewhere; includes trichlorophenols and chlorinated cresols)
19. Chloroform

29. Dichloropropane and dichloropropene
30. 2,4-dimethylphenol
31. Dinitrotoluene

32. Diphenylhydrazine
33. Endosulfan and metabolites
34. Endrin and metabolites
35. Ethylbenzene
36. Fluoranthene
37. Haloethers
    (other than listed elsewhere; includes chlorophenylphenyl ethers, bromophenylphenyl ether, bis(dichloroisopropyl) ether, bis-(chloroethoxy) methane and polychlorinated diphenyl ethers)
38. Halomethanes (other than listed elsewhere; includes methylene chloride, methylchloride, methylbromide, bromoform, dichlorobromomethane
39. Heptachlor and metabolites
40. Hexachlorobutadiene
41. Hexachlorocyclohexane
42. Hexachlorocyclopentadiene
43. Isophorone
44. Lead and compounds
45. Mercury and compounds
46. Naphthalene
47. Nickel and compounds
48. Nitrobenzene
49. Nitrophenols (including 2,4-dinitrophenol, dinitrocresol)
50. Nitrosamines
51. Pentachlorophenol
52. Phenol
53. Phthalate esters
54. Polychlorinated biphenyls (PCBs)
55. Polynuclear aromatic hydrocarbons (including benzanthracenes, benzopyrenes, benzofluoranthene, chrysenes, dibenz-anthracenes, and indenopyrenes)
56. Selenium and compounds
57. Silver and compounds
58. 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)
59. Tetrachloroethylene
60. Thallium and compounds
61. Toluene
62. Toxaphene
63. Trichloroethylene
64. Vinyl chloride
65. Zinc and compounds

[44 FR 44502, 7/30/79, as amended at 46 FR 2266, 1/8/81; 46 FR 10724, 2/4/81]

A-2f

Priority Pollutant (Name)		Concentration
ZINC (PLATING)	30 Day Average	0.8 Mg/L
	1 Day Maximum	2.61 Mg/L
CHROMIUM (PLATING)	30 Day Average	1.71 Mg/L
	1 Day Maximum	2.77 Mg/L
COPPER (IMPURITIES)	30 Day Average	2.07 Mg/L
	1 Day Maximum	3.38 Mg/L
LEAD (IMPURITIES)	30 Day Average	.430 Mg/L
	1 Day Maximum	.690 Mg/L
NICKLE (IMPURITIES)	30 Day Average	2.38 Mg/L
	1 Day Maximum	3.98 Mg/L
SILVER (IMPURITIES)	30 Day Average	.240 Mg/L
	1 Day Maximum	.430 Mg/L
	30 Day Average	
	1 Day Maximum	
	30 Day Average	
	1 Day Maximum	

(Attach additional sheets as needed.)

List all chemicals/products with MSDS information at your facility that may come into contact with water at any time. Include any chemicals that are stored in an area adjacent to a wastestream, which may become contaminated if spilled. Attach additional sheets as needed.

Chemical Name	Amount used per day	Amount Stored at Facility
NONE		

5. Attach sketches of the following to this document:
General plant processes and wastewater lines (including the location of all floor drains). Include any existing or proposed pretreatment systems, the location and sizes of all existing and proposed connections to the CWL Wastewater Collection System. Also, include the details of the proposed monitoring access facilities. (See ATTACHMENT of PLANT LAYOUT of Discharg

6.a. Describe the nature of the manufacturing/commercial activities of the plant. Describe in detail any water usages other than sanitary or noncontact cooling water. Attach additional sheets as required.

MANUFACTURE OF STEEL ELECTRICAL CONDUIT PIPE, ELBOWS AND FITTINGS. WATER USED FOR PICKLING, FLUXING AND ZINC ELECTROPLATING OPERATIONS. ALL WATER IS PRETREATED PRIOR TO DISCHARGE TO THE CITY POTW.

6.b. Describe any products manufactured or assembled at the plant by type and amount.

PVC COATED CONDUIT PIPE AND FITTINGS. (8584 pcs Daily)
STEEL CONDUIT FITTINGS. (29506 pcs. Daily)
ZINC PLATED STEEL ELECTRICAL FITTINGS. (125,035 pcs Daily)

6.c. Describe the type and amount of raw materials used at the facility.

STEEL PIPE. (71,128 lbs per Day)
MALLEABLE IRON CASTING (20000 lbs per DAY)
COIL STEEL (10,500 lbs per Day)
ZINC (3600 lbs per Day)
PLASTISOL (PVC) (34,000 lbs per Day)

7.a. What are the hours of operation at your facility?

Shift	Hours	Day of the Week Mon	Tue	Wed	Thu	Fri	Sat	Sun
1st:	7 to 3	✓	✓	✓	✓	✓	( )	( )
2nd:	3 to 11	✓	✓	✓	✓	✓	( )	( )
3rd:	11 to 7	✓	✓	✓	✓	✓	( )	( )

7.b. What are the proposed/actual hours of operation of any pretreatment systems at your facility?

Shift	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Day of the Week:
1st:	7 to 3	7 to 3	7 to 3	7 to 3	7 to 3	__ to __	__ to __	SOMETIME ON
2nd:	3 to 11	3 to 11	3 to 11	3 to 11	3 to 11	__ to __	__ to __	SAT / SUN.
3rd:	11 to 7	11 to 7	11 to 7	11 to 7	11 to 7	__ to __	__ to __	

8. Is your manufacturing or commercial operation subject to National Categorical Pretreatment Standards?

(✓) Yes ( ) No.

If you answered yes to the above question, to which of the following National Categorical

(The categorical standards are listed on the following page.)

EPA Categorical Standards	40 CFR Part	New Source Date
Aluminum Forming	467	11/22/1982
Battery Mfg.	461	11/10/1982
Carbon Black Mfg (New Sources Only)	458	5/18/1976
Centralized Waste Treatment	437	8/28/00
Coil Coating	465	1/12/1981 (Subparts A, B, C); 2/10/1983 (Subpart D)
Copper Forming	468	11/12/1982
Electrical & Electronic Components	469	8/24/1982 (Subparts A, B) 3/9/1983 (Subparts C, D)
Electroplating	413	8/31/1982
Feedlots (New Sources Only)	412	9/7/1973
Fertilizer Mfg. (New Sources Only)	418	12/7/1973 (Sub A-D); 1/16/76 (Sub E); 10/7/74 (Sub F-G)
Glass Mfg. (New Sources Only)	426	8/21/1974 (Subparts H, K-M)
Grain Mills (New Sources Only)	406	12/4/1973
Ink Formulating (New Sources Only)	447	2/26/1975
Inorganic Chemicals Mfg.	415	7/24/1980(Phase 1); 10/25/1983 (Phase 2)
Iron & Steel	420	1/7/1981
Leather Tanning & Finishing	425	7/2/1979
Metal Finishing	433	8/31/1982
Metal Molding & Casting	464	11/15/1982
Nonferrous Metals Forming	471	3/5/1984
Nonferrous Metal Mfg.	421	2/17/83 (Sub A-I, K-M) ; 1/22/87 (Sub J); 6/27/84 (Sub N-AE)
Oil & Gas Extraction	435	2/17/95 (Subpart D)
Organic Chem., Plastics & Synthetic Fibers	414	3/21/1983
Paint Formulating (New Sources Only)	446	2/26/1975
Paving & Roofing (New Sources Only)	443	1/10/1975
Petroleum Refining	419	12/21/1979
Pesticide Chemicals Mfg.	455	4/10/1992 (Subparts A, B); 4/14/1994 (Subparts C, E)
Pharmaceuticals	439	5/2/1995
Porcelain Enameling	466	2/27/1981
Pulp, Paper & Paperboard	430	1/6/1981 (Subparts A, C-D,F-L) 12/17/93 (Subparts B, E)
Rubber Mfg (New Sources Only)	428	8/23/1974
Soap & Detergent Mfg. (New Sources Only)	417	12/26/1973 (Subpart Q) 2/20/1975 (Subparts O, P, R)
Steam Electric	423	10/14/1980
Timber Products	429	10/31/1979
Transportation Equipment Cleaning	442	6/25/98
Waste Combustors	444	2/6/1998

9. Pollution Prevention Activities

Does this facility have a written Pollution Prevention Plan?
(✓) Yes
( ) No

Does this facility practice Pollution Prevention?
(✓) Yes
( ) No

Check any of the following Pollution Prevention Activities.

(✓) Spill and Leak Prevention Procedures
Explain: SWPP

( ) Water Reuse.
Explain: NO

(✓) Cost accounting to track savings.
Explain: Record keeping on sales of Recycled zinc, cardboard, sulfate salt.

(✓) Inventory Control.
Explain: Quarterly plant wide, Daily cycle counts

(✓) Employee Training.
Explain: P-2 Basic Waste Minimization conducted 2009

(✓) Spent Solvent Reclamation.
Explain: Parts washer solvent is Recycled By FCC. Environmental

(✓) Recycle Paper, Aluminum, Boxes, and Pallets.
Explain: Cardboard is Recycled By Mback Recycling and Pallets

(✓) Recycle Waste Oil, Solvents, and Lubricants.
Explain: Used oil is Recycled By FCC. Environmental

Permit Application for New Permit /Renewal (Cont'd)

An authorized representative of the Industrial user must certify this permit application. Failure to certify will result in denial of permit.

Certification Statement

"I declare that I have examined this report and to the best of my knowledge and belief that it is true, correct, and complete."

Certified by: _____ Date: 2/1/13
(Authorized representative)

Title: PLANT MANAGER

An authorized representative may be:

(A) If the Industrial User is a corporation, the Authorized Representative shall be as follows:

i) The president, secretary, treasurer, or a vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or

ii) 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 capitol 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 individual wastewater discharge permit requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

(B) If the Industrial User is a partnership or sole proprietorship, an Authorized Representative shall be a general partner or proprietor, respectively.

(C) If the Industrial User is a Federal, State, or local governmental facility, an Authorized Representative shall be a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or the Authorized Representative's designee.

(D) The Authorized Representatives described above may designate a Duly Authorized Representative if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company and the written authorization is submitted to the Manager of CWL.

Please note:
The following questions (numbers 9-11) deal with current NPDES or CWL Industrial Pretreatment Program Permit holders.

9. Are the applicable National Categorical Pretreatment Standards and City of Jonesboro Sewer Use Ordinance wastewater discharge limitations being met on a consistent basis? (Y)Yes ( )No

Explain:
COMPLIANT WITH CURRENT PERMIT

10. If the applicable National Categorical Pretreatment Standards and City of Jonesboro Sewer Use Ordinance wastewater discharge limitations are not being met on a consistent basis, is additional pretreatment and/or an alteration of current operations and maintenance (O&M) required by your firm to meet the limitations?

Explain:

If additional pretreatment and/or an alteration of current operations and maintenance (O&M) are required to meet the limitations, submit the compliance schedule (found on the following page) that documents when your facility will attain final compliance with the applicable limitations.

Pretreatment Compliance Schedule Instructions

A. The compliance schedule shall contain a list of the major events leading to compliance. The expected dates of completion of such events shall also be given.

B. The completion dates of any two (2) successive events shall also be given.

C. Within fourteen (14) business days after the completion of each event, the Industrial User shall submit a progress report to the approval authority (CWL) indicating the following:

i. The date the event was completed
ii. If the event was not completed as scheduled, the reason for the delay.
iii. Steps taken by the Industrial User to return to the established schedule.

Comments:

Compliance Schedule Certification Statement

The following compliance schedule must be certified by a Qualified professional and reviewed by an authorized representative of the Industrial User.

An authorized representative may be:

A. A principal executive officer of at least the level of Vice-President (if the Industrial User submitting the report is a Corporation).

B. A general partner or proprietor if the Industrial User submitting the report is a partnership or sole proprietorship, respectively.

Compliance Schedule Certification Statement:

We declare that we have examined this report and to the best of our knowledge and belief that it is true, correct, and complete.

Certified by: _____ Date: __/__/__
Title: _____
(Qualified Professional)

Certified by: _____ Date: __/__/__
Title: _____
(Authorized Representative)

Schedule of CWL Laboratory Charges

Annual Industrial Pretreatment Permit Fee= $667.04 ($55.58 per month)

Excessive Strength Surcharge Formula:

$S = (V_{WW})(8.34)(C_{BOD}\ (BOD_5\text{-}250)+C_{SS}\ (TSS\text{-}250))$

Where:
- S = Surcharge in dollars
- V_{WW} = Volume of wastewater in millions of gallons
- 8.34 = Weight in pounds of one gallon of water
- C_{BOD5} = Charge per pound of BOD_5 =$0.091, effective February 2008
- C_{SS} = Charge per pound of TSS=$0.091, effective February 2008
- BOD_5 = Biochemical Oxygen Demand in mg/L
- TSS = Total Suspended Solids in mg/L
- 250 = Allowed BOD_5 and TSS in mg/L

Excessive Strength Capacity Charge Formula:

$CAP = (V_{WW})(8.34)((\text{Greater of } BOD_5 \text{ or TSS})\text{-}250)(C_{CAP})$

Where:
- CAP = Capacity Charge in dollars
- V_{WW} = Volume of wastewater in millions of gallons
- 8.34 = Weight in pounds of one gallon of water
- C_{CAP} = Charge per pound for Greater of BOD_5 or TSS = $0.083, effective January 2009
- BOD_5 = Biochemical Oxygen Demand in mg/L
- TSS = Total Suspended Solids in mg/L
- 250 = Allowed BOD_5 or TSS in mg/L

Excessive Fats, Oils, and Grease Penalty Formula:

$P = (V_{WW})(8.34)(C_{FOG}\ (FOG\text{-}100))$

Where:
- P = Penalty in dollars
- V_{WW} = Volume of wastewater in millions of gallons
- 8.34 = Weight in pounds of one gallon of water
- C_{FOG} = Charge per pound of FOG=$0.267, effective February 2008
- FOG = Fats, Oils, and Grease in mg/L
- 100 = Allowed FOG in mg/L

CWL Laboratory Sampling and Analysis Fees:

Biochemical Oxygen Demand (BOD_5)	$	23.48
Chemical Oxygen Demand (COD)	$	23.48
Fats, Oils, and Grease (FOG)	$	28.82
PH	$	7.47
Total Suspended Solids (TSS)	$	10.67
Metals (Flame AA/per metal)	$	10.67
Metal digestion (per sample)	$	10.67
Ammonia nitrogen	$	18.14
Sample/Flow meter Rental (per day)	$	57.63
Grab Sample Collection (per day)	$	16.01
Cyanide	$	Set by contract lab
Contract Laboratory	$	Set by approved lab (per analyte)

Charges are subject to revision. At a minimum, Permit Fees, Surcharges, Capacity Charges, Penalties and Laboratory charges will be annually adjusted consistent with the Consumer Price Index.

If another laboratory is used, it must be an approved certified laboratory by the Arkansas Department of Environmental Quality (ADEQ). CWL will collect and split samples for analysis. Sample collection fees will apply to samples analyzed by an approved contract laboratory. Your facility will be billed from CWL for the contract laboratory samples as a miscellaneous fee.

Sampling and analysis performed in compliance with 40 CFR 136.

Owned by the Citizens of Jonesboro

Attachment A-3

COPY

Categorical Significant Industrial User
Industrial Wastewater Discharge Permit
Permit Number: 84-13

In compliance with the provisions and conditions of Part I, Chapter 70, Article III, Division 2, Sewer Use - Pretreatment Ordinance 12:009 of the Jonesboro Municipal Code, hereafter referred to as the Pretreatment Ordinance, and also with any applicable provisions of Federal, State of Arkansas, and local laws or regulations, including all applicable City Water and Light (CWL) regulations:

Hytrol Conveyor Company, Inc.
Site/Mailing Address:
2020 Hytrol Dr.
Jonesboro, Arkansas 72401

hereby known as the Permittee, is authorized to discharge industrial wastes from activities classified by SIC Code 3535 or NAIC code 333922 from the premises located at the above address into CWL's Wastewater Collection System in accordance with the application for permit submitted to CWL on March 10, 2012; effluent limitations, including BMPs; monitoring requirements; and permit conditions set forth herein.

This permit shall become effective December 1, 2012.

This permit and its authorization to discharge shall expire at midnight, November 30, 2017.

This permit is not transferable to persons, companies, or processes other than to which it is originally issued without prior notification to and approval from the Manager of CWL in accordance with Section 70-90 (5) of the Pretreatment Ordinance and provisions furnishing the new owner or operator with a copy of the existing industrial wastewater discharge permit.

Signed this 30th day of November 2012

Jake Rice, III, P.E.
General Operations Director

BASELINE INDUSTRIAL PROCESS WASTEWATER FLOW	
Daily Maximum	**Monthly Average**
56,000 gpd	23,000 gpd

The Baseline Industrial Process Wastewater Flow is a volume based on actual historical industrial process wastewater flow. CWL uses this flow to evaluate any significant change in process flow volume. Pursuant to Part III, #5 of this permit, the Permittee shall provide written notification for any change in production or treatment process whether or not significant process flow changes occur. **Note: The Baseline Industrial Process Wastewater Flows are not flow limits. Process flow is report only.**

Part I. Effluent Limitations

Pollutant Discharge Limitations for Process Wastewater

During the period beginning on the effective date and lasting until the date of expiration, the Permittee is authorized to discharge from Outfall Number 001. The Permittee is an Industrial User (User) that is discharging process wastewater continuously from Outfall Number 001 and is regulated under the Pretreatment Ordinance and applicable provisions of Federal, State of Arkansas, and local laws or regulations, including all appropriate CWL regulations.

Such discharges from Outfall Number 001 shall be limited and monitored as specified below:

DISCHARGE LIMITATIONS					
Effluent Characteristics	**Mass Loading (lb/day, unless otherwise specified)**	**Concentration (mg/L, unless otherwise specified)**		**Monitoring Requirements**	
	Daily	**Daily**	**Monthly Average**	**Frequency {2}**	**Sample Type**
Process Flow {4}	N/A	Report, gpd	Report, gpd	Daily	N/A
Cadmium {3}	N/A	0.11	0.07	1/month	24 Hr TC*
Chromium {3}	N/A	2.77	1.71	1/month	24 Hr TC*
Copper {3}	N/A	3.38	2.07	1/month	24 Hr TC*
Lead {3}	N/A	0.69	0.43	1/month	24 Hr TC*
Nickel {3}	N/A	3.98	2.38	1/month	24 Hr TC*
Silver {3}	N/A	0.43	0.24	2/year	24 Hr TC*
Zinc {3}	N/A	2.61	1.48	1/month	24 Hr TC*
Cyanide {3}	N/A	1.20	0.65	2/year	Grab
Total Toxic Organics (TTO) {3}	N/A	2.13	N/A	2/year	Grab
Fats, Oils & Grease (FOG) {1}	N/A	100	N/A	1/month	Grab
Temperature {1}	N/A	150°F		1/month	Grab
pH {1}	N/A	6.0 S.U. (Min.)	11.5 S.U. (Max.)	1/month	Grab

*TC = Time composite

{1} Pretreatment Ordinance
{2} CWL will use its discretion pertaining to sampling frequency in accordance with Part II. Monitoring Requirements, paragraph (6) of this permit
{3} National Categorical Pretreatment Standard 40 CFR 433.17 (New Sources)
{4} Flow shall be based on the total flow measured by CWL water meter, unless a dedicated wastewater flow-measuring device is required by CWL to be installed

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Such discharges from Outfall Number 001 are also subject to an excessive strength surcharge and excessive strength capacity charge, as set forth in Section 70-99 of the Pretreatment Ordinance as follows:

EXCESSIVE STRENGTH SURCHARGE AND CAPACITY CHARGE LIMITATIONS				
Effluent Characteristics	**Concentration (mg/L, unless otherwise specified)**		**Monitoring Requirements**	
	Daily	**Monthly Average**	**Frequency {2}**	**Sample Type**
Biochemical Oxygen Demand (BOD_5) {1,5}	250	N/A	As required	24 Hr TC*
Total Suspended Solids (TSS) {1,5}	250	N/A	As required	24 Hr TC*
Fats, Oils & Grease (FOG) {1,5}	100	N/A	1/month	Grab

*TC = Time composite

{1} Pretreatment Ordinance
{2} CWL will use its discretion pertaining to sampling frequency in accordance with Part II. Monitoring Requirements, paragraph (6) of this permit
{5} Maximum allowed without paying an excessive strength surcharge (applicable to BOD_5, TSS, and FOG), or excessive strength capacity charge (applicable to BOD_5 and TSS)

Local Limits and Best Management Practices

To protect against pass through and interference, the Permittee may not discharge or cause to be discharged into the Publicly Owned Treatment Works (POTW) any wastewater pollutant concentration exceeding the Technically Based Local Limits (TBLLs) developed from time to time by the Manager of CWL or as required by CWL's National Pollutant Discharge Elimination System (NPDES) permits No. AR0037907 and AR0043401, authorized by 40 CFR 403.5 (c), and approved by the Arkansas Department of Environmental Quality (ADEQ).

When deemed appropriate by the Manger, specific pollutant limitations or Best Management Practices (BMPs) will be developed based on criteria approved by the Manager from time to time. These TBLLs may be performance based or based on best professional judgment, as determined by the sole discretion of the Manager on a case-by-case basis. The Manager may also develop BMPs in wastewater discharge permits to implement specific pollutant limitations. Such BMPs shall be considered Local Limits and Pretreatment Standards. BMPs, if any, shall be attached as an Appendix to this permit.

TBLLs shall apply at the "monitoring point" described in Part II. Monitoring Requirements, paragraph (2) of this permit. All concentration limits for metals pollutants shall be in terms of "total" metals unless otherwise indicated, if applicable to this permit. At the discretion of the Manager, mass limitations may be imposed in addition to or in place of concentration based TBLLs.

When new Local Limits are implemented or revised, CWL will provide individual notice to parties who have requested such notice and an opportunity to respond, as set forth by 40 CFR 403.5 (c) (3) and Section 70-87 (3) of the Pretreatment Ordinance. This requirement of notice applies whether Local Limits are set by ordinance or on a case-by-case basis.

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Part II. Monitoring Requirements

1. The Permittee shall, within 30 days of the effective date of this permit, provide a sampling access facility on their process wastestreams at a "monitoring point" located before the process wastewater has mixed with any other non-process wastestreams discharged from the Permittee's premises. The location, equipment, and configuration contained in the sampling access facility shall be as approved by the Manager or Authorized Representative of the Manager.

2. The Permittee's "monitoring point" shall be Outfall Number 001, located upstream from the Permittee's connection with the CWL Wastewater Collection System and any non-process wastestreams. The Permittee's effluent shall consist of process wastewater in accordance with the conditions of this permit. The sampling facility shall be located inside the main building, behind the phosphatizing line along the South wall, immediately downstream from pretreatment facilities if such exist or immediately downstream from the regulated process if no pretreatment exists, but before the process wastewater has mixed with other non-process wastestreams. The sampling facility is to be equipped with a 110 volt GFCI outlet with the capability to connect a flow-measuring device capable of producing a 4-20 mA signal, which may be used to pace CWL sampling devices. CWL reserves the right to require the installation of a flow-measuring device.

3. Sampling and analysis of industrial wastes discharged into the CWL Wastewater Collection System shall be performed by CWL or a laboratory certified for each permitted analyte by ADEQ. Analyses shall be in accordance with 40 CFR 136, as amended, and Section 70-91(10) of the Pretreatment Ordinance.

4. The Permittee shall pay to CWL the costs of required sampling and analysis at the rates set forth in the Schedule of CWL Laboratory Charges, attached as an Appendix to this document.

5. The Permittee may, upon their request, obtain a portion of a sample for their analyses if such request is approved by CWL. Only authorized CWL personnel shall perform splitting of samples if the request is approved. Split results performed by the Permittee are for information only and will not be reportable as results for the purposes of any monitoring required by the Pretreatment Ordinance, this permit, or any order issued thereunder.

6. The frequency of sampling shall be as indicated in Part I. Effluent Limitations of this permit unless the results of monitoring indicate the need, as determined by CWL, for more or less frequent sampling. The frequency of compliance monitoring shall be in no case less than twice per year, as required by 40 CFR 403.12 and Section 70-91 (4) of the Pretreatment Ordinance. Samples shall be 24-hour composite or grab samples in accordance with 40 CFR 136, as amended, and Section 70-91(11) of the Pretreatment Ordinance. Samples shall be representative of daily operations, including production and/or cleanup days. Days on which samples are taken may be varied and shall be determined by the Manager or Authorized Representative of the Manager.

7. The Permittee shall maintain daily records of total process wastewater flows discharged to the CWL wastewater collection system. Records of the daily process wastewater discharged to the CWL wastewater collection system shall be reported monthly, unless otherwise required, in writing to the Manager or the Authorized Representative of the Manager.

8. In lieu of the required monitoring for total toxic organics (TTO), CWL may allow the Permittee to alternatively certify that no dumping of toxic organics to the wastestream has occurred, at the Permittee's request. When requesting that no TTO monitoring be required, the Permittee must submit a Toxic Organic Management Plan (TOMP) that specifies to the satisfaction of CWL 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 discharged to the POTW. A sample TOMP outline as based on EPA Guidance Manual for Implementing Total Toxic Organics Pretreatment Standards (1985) is included as an Appendix to this document.

A notarized TTO certification statement shall be submitted to CWL by the Permittee to qualify for the TTO monitoring waiver, certifying that no dumping of concentrated toxic organics into the wastewater discharged to the POTW has occurred since the last TTO compliance monitoring and that the Permittee is implementing the approved TOMP. The Permittee shall provide the TTO certification statement included as an Appendix herein, signed and dated by the Authorized Representative, as defined in Section 70-85 (4) of the Pretreatment Ordinance, as requested by CWL but in no case less than twice a year.

9. If the Permittee does not have an approved TOMP or if CWL otherwise determines the alternative certification submitted by the Permittee does not satisfy requirements for TTO monitoring or the Permittee's approved TOMP is not followed, TTO monitoring shall be required. CWL will perform sampling for TTO analysis and transport the samples to a commercial laboratory selected by CWL for TTO analyses. In cases where monitoring to determine TTO compliance is necessary, sampling and analysis for TTO will only be required for those organics which would reasonably be expected to be present in the Permittee's effluent. The laboratory shall report results of TTO analyses to both CWL and the Permittee. The Permittee shall pay all costs incurred for TTO analyses.

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Part III. Conditions of Permit

1. Permit Fee

The Permittee shall pay an annual permit fee to CWL, as set forth in the Schedule of CWL Laboratory Charges included as an Appendix to this permit. This fee represents the Permittee's pro rata share of the costs incurred by CWL to administer CWL's Industrial Pretreatment Program.

2. Pretreatment Facility Approval

The Manager or Authorized Representative of the Manager shall approve all plans and specifications for new or modifications to existing monitoring access facilities and pretreatment facilities.

3. Report of Potential Problems

In the case of any discharge, including but not limited to accidental discharges; discharges of a non-routine, episodic nature; a non-customary batch discharge; or any spill and/or slug loading which may cause potential problems for the POTW, the Permittee shall notify the CWL Pretreatment Coordinator immediately via telephone (870.930.3392) or the CWL dispatcher after normal business hours (870.935.5581), as set forth in Section 70-91(6) of the Pretreatment Ordinance. Immediate, appropriate action shall be taken by the Permittee to mitigate any adverse effects of the discharge.

Within five (5) days following such discharge, the Permittee shall, unless waived by the Manager, submit a detailed written report describing the cause(s) of the discharge and the measures to be taken by the Permittee to prevent similar future occurrences, in accordance with Section 70-91 (6) of the Pretreatment Ordinance.

4. Accidental or Slug/Spill Discharge Control Plans

The Manager shall evaluate whether the Permittee needs an accidental or slug/spill discharge control plan, in accordance with Section 70-88 (3) of the Pretreatment Ordinance. The Manager may require the Permittee to develop, submit for approval, and implement such a plan or take such other action that may be necessary to control spill or slug discharges. An accidental or slug/spill discharge control plan shall address, at a minimum, the following:

(A) Description of discharge practices, including non-routine batch discharges;

(B) Description of stored chemicals;

(C) Procedures for immediately notifying CWL of any accidental or slug discharge. Such notification must also be given for any discharge which would violate any of the prohibited discharges established in Section 70-87 of the Pretreatment Ordinance; and

(D) Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.

The Permittee shall notify CWL immediately of any changes at its facility affecting potential for a slug discharge.

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5. Report of Changed Conditions

The Permittee shall notify the Manager or Authorized Representative of the Manager in writing at least sixty (60) days prior to any change in production or treatment processes which would significantly affect the nature, quality, or volume of the wastewater discharged to the CWL Wastewater Collection System, as set forth in Section 70-91 (5) of the Pretreatment Ordinance. The Permittee shall not implement the planned changed conditions until and unless the CWL Pretreatment Coordinator has responded to the Permittee's notice. The Manager or Authorized Representative of the Manager must also be notified in writing when there is a change in pretreatment contact personnel at the Permittee's facilities.

6. Hazardous Waste

Any Permittee who commences or causes the commencement of the discharge of hazardous waste, in compliance with 40 CFR 403.12 (p) (1) and Section 70-91 (9) of the Pretreatment Ordinance, shall notify the Manager, the EPA Region VI Waste Management Division Director, and State hazardous waste authorities in writing of any discharge to the POTW of any substance(s) which, if otherwise disposed, would be classified as a hazardous waste under 40 CFR 261. Notification requirements and exemptions shall be as set forth in Section 70-91 (9) of the Pretreatment Ordinance.

The Permittee shall maintain documentation pertaining to the disposal of sludges or other materials classified as hazardous wastes by a method and at a site approved by appropriate State of Arkansas and Federal Regulatory Agencies.

7. Right of Entry

For the purpose of determining whether the Pretreatment Ordinance and any permit or order issued thereunder is being met and whether the Permittee is complying with all requirements thereof, the Manager and/or the Authorized Representative of the Manager shall have the right to enter any facilities of the Permittee, including but not limited to the production, materials storage, and wastewater pretreatment areas of the facility. The Permittee shall allow ready access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties, as set forth Section 70-92 of the Pretreatment Ordinance.

8. Recordkeeping

The Permittee shall retain and make available for inspection and copying by the Manager and/or the Authorized Representative of the Manager, all records and information required to be retained in accordance with Section 70-91 (13) of the Pretreatment Ordinance, including all information resulting from any monitoring activities. These records shall remain available for a minimum of three (3) years, with the exception that this period shall be automatically extended for the duration of any enforcement action concerning compliance with the Pretreatment Ordinance or where the Permittee has been specifically notified of a longer retention period by the Manager.

9. General Prohibitions

As established in Section 70-87 (1) (A) of the Pretreatment Ordinance, the Permittee shall not introduce or cause to be introduced into the POTW any pollutant or wastewater which causes pass-through or interference. These general prohibitions apply to all Industrial Users of the POTW, whether or not the User is subject to Categorical Pretreatment Standards or any other National, State, or local Pretreatment Standards or Requirements.

10. Specific Prohibitions

As established in Section 70-87 (1) (B) of the Pretreatment Ordinance, the Permittee shall not contribute or cause to be introduced the following specifically prohibited pollutants, substances, or wastewater to the POTW:

(A) Pollutants which create a fire or explosive hazard in the municipal wastewater collection

system or POTW, including but not limited to waste streams with a closed-cup flashpoint of less than 140°F (60°C) using the test methods specified in 40 CFR 261.21;

(B) Any wastewater having a pH less than 6.0 S.U. or more than 11.5 S.U., or otherwise causing corrosive structural damage to the POTW or equipment or endangering CWL personnel;

(C) Solid or viscous substances in amounts which will cause obstruction of the flow to and within the POTW or result in interference, but in no case solids greater than one half (1/2) inch (1.27 centimeters) in any dimension;

(D) Any wastewater containing pollutants, including oxygen demanding pollutants (BOD_5, *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 or any wastewater treatment or sludge process, or which will constitute a hazard to humans;

(E) Any wastewater having a temperature greater than 150°F (65°C) or that which will inhibit biological activity in the treatment plant and result in interference, but in no case wastewater which causes the temperature at the introduction into the WWTP to exceed 104°F (40°C);

(F) Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

(G) Any pollutants that 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 designated by the Manager in accordance with Section 70-88 (5) of the Pretreatment Ordinance.

(I) Any noxious or malodorous liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance, a hazard to life, or to prevent human entry into the sewers for maintenance and repair;

(J) Any wastewater which imparts color that cannot be removed by the treatment process, such as but not limited to dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating CWL's NPDES permit;

(K) Wastewater containing any radioactive wastes or isotopes except as specifically approved by the Manager in an industrial wastewater discharge permit and in compliance with applicable State or Federal regulations;

(L) Stormwater, surface water, groundwater, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, noncontact cooling water, and unpolluted industrial wastewater, unless specifically authorized by the Manager;

(M) Any sludges, screenings, or other residues from the pretreatment of industrial wastes;

(N) Any medical wastes, except as specifically authorized by the Manager in an industrial wastewater discharge permit;

(O) Any wastewater causing the treatment plant's effluent to fail a toxicity test;

(P) Any wastes containing detergents, surface-active agents, surfactants, or other substances that

may cause excessive foaming or scum in the POTW;

(Q) Any wastes containing fats, oils, or grease (FOG) of animal, vegetable, or mineral origin exceeding one hundred (100) mg/L, except as specifically authorized by the Manager; and

(R) Any liquids, solids, or gases which by reason of nature or quantity are or may be sufficient either alone or by interaction with other substances to cause fire or explosion or be injurious in any other way to the POTW or to the operation of the POTW. Wastewater causing two (2) readings on an explosions hazard meter at the point of discharge into the POTW, or at any point in the POTW, of more than 5% or any single reading over 10% of the Lower Explosive Limit of the meter.

11. Significant Noncompliance

In accordance with 40 CFR 25 and in the enforcement of National Pretreatment Standards, the Manager shall publish annually, in a newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW, a list of the Industrial Users which, during the previous 12 months, were in Significant Noncompliance with applicable Pretreatment Standards and Requirements. An SIU (or any IU in violation of paragraphs (C), (D), or (H) below) is in Significant Noncompliance if the violation meets or exceeds one or more of the following:

(A) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all the measurements taken for the same pollutant parameter during a six-month period exceed by any magnitude a numeric Pretreatment Standard or Requirement, including instantaneous discharge limits, as defined by 40 CFR 403.3 (1) and Section 70-87 of the Pretreatment Ordinance;

(B) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of all the measurements taken for each pollutant parameter during a six-month period equal or exceed the product of numeric Pretreatment Standard or Requirement, including instantaneous discharge limits, as defined by 40 CFR 403.3 (1) and Section 70-87 of the Pretreatment Ordinance, multiplied by the applicable criteria [1.4 for BOD, TSS; and FOG and 1.2 for all other pollutants except pH];

(C) Any other violation of a Pretreatment Standard or Requirement, as defined by 40 CFR 403.3 (1) and Section 70-87 of the Pretreatment Ordinance (daily maximum, long-term average, instantaneous discharge limit, or narrative standard) that the Manager determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of CWL personnel and/or the general public);

(D) Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment or has resulted in the Manager exercising emergency authority to halt or prevent such a discharge;

(E) 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;

(F) Failure to provide, within 45 days after the due date, any required reports, including baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;

(G) Failure to accurately report noncompliance; or

A3;

(H) Any other violation(s), which may include a violation of Best Management Practices, which the Manager determines will adversely affect the operation or implementation of the local pretreatment program.

12. Civil and Criminal Penalties and Fines

The Permittee shall be subject to applicable civil and criminal penalties and fines and any applicable compliance schedule for violation of any provision of the Pretreatment Ordinance, Pretreatment Standards and Requirements, and provisions and conditions of this wastewater discharge permit, as provided for by Arkansas State Statutes, the Pretreatment Ordinance, and all applicable CWL regulations. Such compliance schedules may not extend the time for compliance beyond that required by applicable Federal, State, or local law. As established in Sections 70-96 (2-3) of the Pretreatment Ordinance and Sections 70-111 (2-3) of the General Sewer Use Ordinance, as applicable, such civil penalties and criminal fines may not exceed $1,000.00 per violation per day.

13. Administrative Fines

The Permittee shall be subject to applicable administrative fines for violation of any provision of the Pretreatment Ordinance, Pretreatment Standards and Requirements, and provision and conditions of this wastewater discharge permit. As established in Section 70-95 (6) of the Pretreatment Ordinance and Section 70-110 (6) of the General Sewer Use Ordinance, as applicable, such administrative fines may not exceed $1,000.00 per each violation, with each day of a continuing violation deemed a separate violation in an amount not to exceed $500.00 for each day the violation continues. The Manager may add the costs of preparing administrative enforcement action, such as notices and orders, to the fine.

14. Emergency Suspensions

The Manager or Authorized Representative of the Manager may immediately suspend the Permittee's discharge (after informal notice to the Permittee) whenever such suspension is necessary in order to stop an actual or threatened discharge which reasonably appears to present or cause an imminent and substantial endangerment to the health or welfare of persons. The Manager or Authorized Representative of the Manager may also immediately suspend the Permittee's discharge (after notice and opportunity to respond) that threatens to interfere with the operation of the POTW or which presents or may present an endangerment to the environment.

(A) If notified of a suspension of its discharge, the Permittee shall immediately stop or eliminate its contribution. In the event of the Permittee's failure to immediately and voluntarily comply with the suspension order, the Manager or Authorized Representative of the Manager shall take such steps as deemed necessary, including immediate severance of the sewer connection, to prevent or minimize damage or endangerment to the POTW, the POTW's receiving stream, or any person. The Manager or Authorized Representative of the Manager shall allow the Permittee to recommence discharging to the POTW when the Permittee has demonstrated to the satisfaction of the Manager that the period of endangerment has passed, unless termination proceedings set forth in Section 70-95 (8) of the Pretreatment Ordinance or Section 70-110 (8) of the General Sewer Use Ordinance, as applicable, are initiated against the Permittee.

(B) A User that is responsible, in whole or in part, for any discharge presenting imminent and substantial endangerment shall submit a detailed written statement describing the causes of the harmful contribution and the measures taken to prevent any future occurrence to the Manager or Authorized Representative of the Manager, prior to the date of any show cause or termination hearing under Sections 70-95 (3) and 70-95 (8) of the Pretreatment Ordinance or Sections 70-110 (3) and 70-110 (8) of the General Sewer Use Ordinance, as applicable.

Nothing in this Section shall be interpreted as requiring a hearing prior to any emergency suspension under this Section.

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15. Termination of Discharge

In addition to those provisions set forth in Section 70-90 (6) of the Pretreatment Ordinance and Sections 70-107 through 70-109 of the General Sewer Use Ordinance, as applicable, any Industrial User that violates the following conditions as established in Section 70-95 (8) of the Pretreatment Ordinance and Section 70-110 (8) of the General Sewer Use Ordinance, as applicable, wastewater discharge permits, any orders issued thereunder, or any other Pretreatment Standard or Regulation, including but not limited to those conditions listed below, is subject to termination of wastewater discharge:

(A) Violation of wastewater discharge permit conditions;

(B) Failure to accurately report the wastewater constituents and characteristics of its discharge;

(C) Failure to report significant changes in operations or wastewater volume, constituents and/or characteristics prior to discharge;

(D) Refusal of reasonable access to the Permittee's premises for the purpose of inspection, monitoring, and/or sampling; or

(E) Violation of the Pretreatment Standards set forth in Section 70-87 of the Pretreatment Ordinance and Section 70-108 of the General Sewer Use Ordinance, as applicable.

Such Users in violation will be notified by the Manager or Authorized Representative of the Manager of the proposed termination of its discharge and be offered an opportunity to show cause under Section 70-95 (3) of the Pretreatment Ordinance or Section 70-110 (3) of the General Sewer Use Ordinance, as applicable, why the proposed action should not be taken.

16. Wastewater Discharge Permit Transfer

As provided under Section 70-90 (5) of the Pretreatment Ordinance, wastewater discharge permits may be reassigned or transferred to a new owner and/or operator only if the permittee gives at least thirty (30) days advance notice to the Manager, unless the thirty (30) day period is otherwise waived by the Manager, and the Manager approves the wastewater discharge permit transfer. The notice to the Manager must include a written certification by the new owner and/or operator which:

(A) States that the new owner and/or operator has no immediate intent to change the facility's operations and processes;

(B) Identifies the specific date on which the transfer is to occur; and

(C) Acknowledges full responsibility for complying with the existing wastewater discharge permit.

Failure to provide advance notice of a transfer renders the existing wastewater discharge permit void on the date of the facility transfer.

17. Permit Revocation

The Manager may revoke wastewater discharge permits for the following reasons:

(A) Failure to notify the Manager of significant changes to the wastewater prior to the changed discharge;

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(B) Failure to provide prior notification to the Manager of changed conditions pursuant to Section 70-91 (5) of the Pretreatment Ordinance;

(C) Misrepresentation or failures to fully disclose all relevant facts in the wastewater discharge permit application;

(D) Falsification of self-monitoring reports and/or certification statements;

(E) Tampering with monitoring equipment

(F) Refusal to allow the Manager timely access to the facility premises and records;

(G) Failure to meet effluent limitations;

(H) Failure to pay fines;

(I) Failure to pay sewer charges, including any surcharges or capacity charges;

(J) Failure to meet compliance schedules;

(K) Failure to complete a wastewater survey or the wastewater discharge permit application, or failure to update such information as required by the Pretreatment Ordinance;

(L) Failure to provide advance notice of the transfer of a permitted facility; or

(M) Violation of any Pretreatment Standard or Requirement, any terms of wastewater discharge permit, or the Pretreatment Ordinance.

Unless a transfer is approved in accordance with Section 70-90 (5) of the Pretreatment Ordinance and as described here, wastewater discharge permits shall also be voided and revoked upon an unapproved transfer of facility ownership or following a period of ninety (90) days of disuse or cessation of operations at the facility.

18. Facility Closure Notification

A minimum of ninety (90) days before the closure of a facility or a period of facility disuse of ninety (90) days or more, the Permittee shall notify CWL in writing of the anticipated date of closure, as well as the anticipated date of resumption of facility use, if any, in accordance with Section 70-90 (7) of the Pretreatment Ordinance.

19. Permit Modification

As set forth by Section 70-90 (4) of the Pretreatment Ordinance, the Manager may modify this permit at any time during the permit effective dates for good cause including, but not limited to the following:

(A) To incorporate any new or revised Federal, State, or local Pretreatment Standards or Requirements;

(B) To address significant alterations or additions to the Permittee's operation, processes, or wastewater volume or character since the time of the wastewater discharge permit issuance;

(C) A change in the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;

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(D) Information indicating that the permitted discharge poses a threat to the POTW, POTW personnel, beneficial sludge use, or the receiving waters;

(E) Violation of any terms or conditions of the wastewater discharge permit;

(F) Misrepresentations or failure to fully disclose all relevant facts in the wastewater discharge permit application or in any required reporting;

(G) Revision of Categorical Pretreatment Standards pursuant to 40 CFR 403.13;

(H) To correct typographical or other clerical errors in the wastewater discharge permit; or

(I) To reflect a transfer of the facility ownership and/or operation to a new owner or operator where request in accordance with Section 70-90 (5) of the Pretreatment Ordinance.

20. Wastewater Discharge Permit Reissuance:
In accordance with Section 70-90 (8) of the Pretreatment Ordinance, a User with an expiring wastewater discharge permit shall apply for the reissuance of a wastewater discharge permit by submitting a complete wastewater discharge permit application, acceptable to the Manager, in accordance with Section 70-89 (5) of the Pretreatment Ordinance, a minimum of sixty (60) days prior to the expiration of the Permittee's existing wastewater discharge permit.

Conditions of this permit will continue in effect past the expiration date pending issuance of a new permit, if:

(A) The Permittee has submitted a timely and complete application; and

(B) CWL, through no fault of the Permittee, fails to issue a new permit prior to the expiration of the previous permit.

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Schedule of CWL Laboratory Charges

Annual Industrial Pretreatment Permit Fee = $716.69 ($59.72 per month)

Excessive Strength Surcharge Formula:

$S = (V_{WW})\ (8.34)\ [C_{BOD5}\ (BOD_5\text{-}250) + C_{TSS}\ (TSS\text{-}250) + C_{FOG}\ (FOG\text{-}100)]$

Where:
- S = Surcharge in dollars
- V_{WW} = Volume of wastewater in millions of gallons
- 8.34 = Weight in pounds of one gallon of water
- C_{BOD5} = Charge per pound of BOD_5 = $0.097, effective February 2012
- C_{TSS} = Charge per pound of TSS = $0.097, effective February 2012
- C_{FOG} = Charge per pound of FOG = $0.287, effective February 2012
- BOD_5 = Biochemical Oxygen Demand in mg/L of the Industrial User's wastewater
- TSS = Total Suspended Solids in mg/L of the Industrial User's wastewater
- FOG = Fats, Oils, and Grease in mg/L of the Industrial User's wastewater
- 250 = Concentration in mg/L above which both BOD_5 and TSS are defined as "excessive" and a surcharge may be assessed
- 100 = Concentration in mg/L above which FOG is defined as "excessive" and a surcharge may be assessed

Excessive Strength Capacity Charge Formula:

$CAP = (V_{WW})\ (8.34)\ [((\text{Greater of } BOD_5 \text{ or TSS})\text{-}250)\ C_{CAP}]$

Where:
- CAP = Capacity Charge in dollars
- V_{WW} = Volume of wastewater in millions of gallons
- 8.34 = Weight in pounds of one gallon of water
- C_{CAP} = Charge per pound for Greater of BOD_5 or TSS = $0.134, effective February 2012
- BOD_5 = Biochemical Oxygen Demand in mg/L of the Industrial User's wastewater
- TSS = Total Suspended Solids in mg/L of the Industrial User's wastewater
- 250 = Concentration in mg/L above which both BOD_5 and TSS are defined as "excessive" and a capacity charge may be assessed

CWL Laboratory Sampling and Analysis Fees:

Biochemical Oxygen Demand (BOD_5)	$	25.23
Chemical Oxygen Demand (COD)	$	25.23
Fats, Oils, and Grease (FOG)	$	30.96
pH	$	8.03
Total Suspended Solids (TSS)	$	11.47
Metals (Flame atomic absorption/per metal)	$	11.47
Metal digestion (per sample)	$	11.47
Ammonia Nitrogen	$	19.49
Sample/Flowmeter Rental (per day)	$	61.92
Grab Sample Collection (per day)	$	17.20
Cyanide	$	Set by contract lab
Contract Laboratory	$	Set by approved lab (per analyte)

Charges are subject to revision. At a minimum, permit fees, excessive strength surcharges, excessive strength capacity charges and laboratory charges will be annually adjusted consistent with the Consumer Price Index.

If another laboratory is used, it must be an approved certified laboratory by the Arkansas Department of Environmental Quality (ADEQ). CWL will collect and split samples for analysis if requested by the User and approved by CWL. Sample collection fees will apply to samples analyzed by an approved contract laboratory.

Your facility will be billed from CWL for the contract laboratory samples as a miscellaneous fee. Sampling and analysis performed in compliance with 40 CFR 136, as amended, and as set forth in Sections 70-91 (10) and (11) of the Pretreatment Ordinance.

A-3N

Attachment A-4

Thomas & Betts Corporation
Fact Sheet
Updated September 5, 2014

Permit Number - 9502
Contact: Darryl Worsham
E-mail Address:
darrylworsham@tnb.com

Phone: (870) 935.2559 EX. 3629
Number of Employees: 371

Site Address
5601 E. Highland Dr.
Jonesboro, AR. 72401

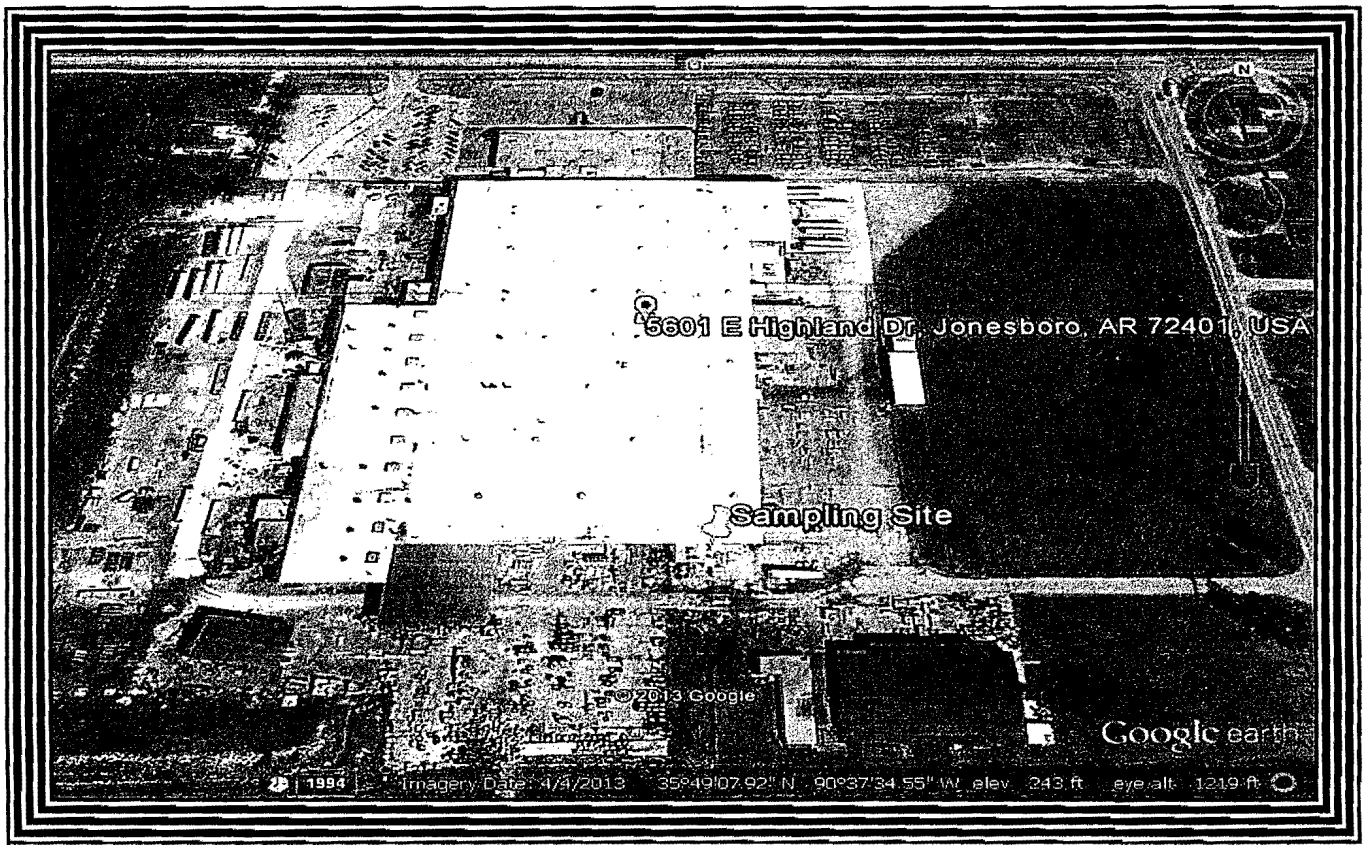
Permit Effective Date: 06/01/10
Permit Expiration Date: 05/31/15

Effluent Limitations/Monitoring Frequency

DISCHARGE LIMITATIONS					
Effluent Characteristics	**Mass Loading (lb/day, unless otherwise specified)**	**Concentration (mg/L, unless otherwise specified)**		**Monitoring Requirements**	
	Daily	**Daily**	**Monthly Average**	**Frequency**	**Sample Type**
Process Flow	N/A	Report, gpd	Report, gpd	Daily	N/A
Cadmium	N/A	0.11	0.07	1/month	24 Hr TC
Chromium	N/A	2.77	1.71	1/month	24 Hr TC
Copper	N/A	3.38	2.07	1/month	24 Hr TC
Lead	N/A	0.69	0.43	1/month	24 Hr TC
Nickel	N/A	3.98	2.38	1/month	24 Hr TC
Silver	N/A	0.43	0.24	2/year	24 Hr TC
Zinc	N/A	2.61	0.80	1/month	24 Hr TC
Cyanide	N/A	1.20	0.65	2/year	Grab
Total Toxic Organics (TTO)	N/A	2.13	N/A	2/year	Grab
Fats, Oils & Grease (FOG)	N/A	100	N/A	1/month	Grab
Temperature	N/A	150°F		1/month	Grab
pH	N/A	6.0 S.U. (Min.)	11.5 S.U. (Max.)	1/month	Grab
Total Phosphorus (TP)	N/A	Report	Report	1/month	24 Hr TC
Nitrate + Nitrite Nitrogen (NO3 + NO2-N)	N/A	Report	Report	1/month	24 Hr TC

(1) Sampling Location/Pretreatment

Thomas & Betts Corporation's effluent shall consist of pretreated, process wastewater. The sampling facility shall be located along the southern wall outside of the main facility, downstream of the pretreatment process, upstream from Thomas & Betts Corporation's sanitary sewer connection with the POTW. Pretreatment consists of chemical precipitation, clarification, filtration for solids removal, and pH adjustment.



(2) Industrial Processes.

Thomas&Betts is a Categorical Industry classified as a Metal Finisher subject to National Categorical Pretreatment Standards and has been monitored by CWL since 1995 when they were issued an Industrial Waste Permit. Thomas & Betts process consists of the manufacture of about 91,000,000 pieces per year of electrical fittings.

(3) Principle Product(s) and Raw Material(s). (Describe all)

Principle Products(s): Electrical Fittings
Raw Material(s): Steel, Steel Tubing, and Malleable Iron.

(4) Flow Rate.

BASELINE INDUSTRIAL PROCESS WASTEWATER FLOW	
Daily Maximum	**Monthly Average**
80,000 gpd	50,000 gpd

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(5) Pretreatment Standards.

Is the SIU subject to categorical pretreatment standards?

Yes, Metal Finisher (40 CFR Part 433.17and 40 CFR 420 Part I)

(6) Has the SIU caused or contributed to any problems (e.g., upsets, interferences) at the treatment works in the past three years? No.

(7) Is the SIU currently involved in any P2 activities and/or procedures?

Cost Accounting to track savings.
Explain: IU has a program set up to track inventory and savings.

Employee Training.
Explain: Employees go through several training programs. These programs are Lean 101, Safety, Quality Control, and P-2 Basics .

Notes:

- T&B Monthly average for Zn is 0.80 mg/L per consent agreement 12/1994
- Began galvanizing process in 2003
- SNC 2005 and 2006 for exceeding Zn levels
- Pretreatment addition in 2006 to return to and maintain compliance with Permit limits.
- Pretreatment added: Clarification, a 25 micron filtration system and lumicron filter system.
- Utilizing production rate data from August 2008 through July 2009 in the combined wastestream formula, determined that the current limits were sufficient to protect the environment and the POTW. **(See attached calculations)**
- Spill/Slug Plan approved July 2013
- TOMP approved September 2014
- December 2009 completed new sampling facility
- Evaluation of galvanizing stream impact of Pb and Zn pollutants on process discharge completed in April 2010. Determined to continue to permit industry under 40 CFR 433 regulations and 40 CFR 420 since the impact of the galvanizing stream was not significant.
- Will evaluate galvanizing stream impact each permit renewal cycle (every 5 years).

A-4c

Thomas & Betts

Combined Wastestream Evaluation
40 CFR 420

Zinc (Zn) 30 day average (40 CFR 420) = 0.0000918 lbs/ 1000 lbs product

Thomas & Betts Data:

- 9.5 million lbs/year of acid pickled product
- 8,000 gallons per 1 million pounds of product
- 251 production days per year

(9.5 / 251) x 8,000 = 303 gallons/day

$$\frac{(0.0000918 \text{ lbs})}{(1000 \text{ lbs product})} \times (37{,}849 \text{ lbs of product/day}) = 0.0034745 \text{ lbs/day}$$

$$0.0034745 \text{ lbs/day} = C_i\,(8.34)\,\frac{(303 \text{ gallons/day})}{\text{MGD}}$$

C_i = 1.37 mg/L

Based on actual annual production rates August 2008 to July 2009

Combined wastestream formula:

$$C_T = \frac{(\text{Zn 30 day avg limit})(\text{avg. total flow}) + (\text{production based limit})(\text{flow from pickling line})}{(\text{avg. total flow} + \text{flow from pickling line})}$$

$$C_T = \frac{(0.8 \text{ mg/L})\,(0.0303 \text{ MGD}) + (1.37 \text{ mg/L})(0.000303 \text{ MGD})}{(0.0303 + 0.000303)\text{MGD}}$$

$$C_T = \frac{(0.02424) + (0.0004151)}{(0.030603)}$$

$$C_T = \frac{0.0246551}{0.030603}$$

C_T = 0.806 mg/L

Thomas and Betts current monthly average limit of 0.80 mg/L, for Zinc, is more stringent than the calculated alternate discharge limit that is based on the metal finishing and acid pickling categorical standards and proportioned by the flow from those two regulated wastestreams.

A-4d

Thomas & Betts

Combined Wastestream Evaluation
40 CFR 420

Zinc (Zn) Maximum for 1 day (40 CFR 420) = 0.000275 lbs/ 1000 lbs product

Thomas & Betts Data:

- 9.5 million lbs/year of acid pickled product
- 8,000 gallons per 1 million pounds of product
- 251 production days per year

(9.5 / 251) x 8,000 = 303 gallons/day

$$\frac{(0.000275 \text{ lbs})}{(1000 \text{ lbs product})} \times (37{,}849 \text{ lbs of product/day}) = 0.010409 \text{ lbs/day}$$

$$0.010409 \text{ lbs/day} = C_i\,(8.34)\,\frac{(303 \text{ gallons/day})}{\text{MGD}}$$

$C_i = 4.12$ mg/L

Based on actual annual production rates August 2008 to July 2009

Combined wastestream formula:

$$C_T = \frac{(\text{Zn 1 day max limit})(\text{avg. total flow}) + (\text{production based limit})(\text{flow from pickling line})}{(\text{avg. total flow} + \text{flow from pickling line})}$$

$$C_T = \frac{(2.61 \text{ mg/L})\,(0.0303 \text{ MGD}) + (4.12 \text{ mg/L})\,(0.000303 \text{ MGD})}{(0.0303 + 0.000303)\text{MGD}}$$

$$C_T = \frac{(0.079083) + (0.001248)}{(0.030603)}$$

$$C_T = \frac{0.080331}{0.030603}$$

$C_T = 2.62$ mg/L

Thomas and Betts current daily maximum limit of 2.61 mg/L, for Zinc, is more stringent than the calculated alternate discharge limit that is based on the metal finishing and acid pickling categorical standards and proportioned by the flow from those two regulated wastestreams.

Thomas & Betts

Combined Wastestream Evaluation
40 CFR 420

Lead (Pb) Maximum for 1 day (40 CFR 420) = 0.000206 lbs/ 1000 lbs product

Thomas & Betts Data:

- 9.5 million lbs/year of acid pickled product
- 8,000 gallons per 1 million pounds of product
- 251 production days per year

(9.5 / 251) x 8,000 = 303 gallons/day

$$\frac{(0.000206 \text{ lbs})}{(1000 \text{ lbs product})} \times (37{,}849 \text{ lbs of product/day}) = 0.0077969 \text{ lbs/day}$$

$$0.0077969 \text{ lbs/day} = C_i\,(8.34)\,\frac{(303 \text{ gallons/day})}{\text{MGD}}$$

$C_i = 3.09$ mg/L

Based on actual annual production rates August 2008 to July 2009

Combined wastestream formula:

$$C_T = \frac{(\text{Pb 1 day max limit})(\text{avg. total flow}) + (\text{production based limit})(\text{flow from pickling line})}{(\text{avg. total flow} + \text{flow from pickling line})}$$

$$C_T = \frac{(0.69 \text{ mg/L})\,(0.0303 \text{ MGD}) + (3.09 \text{ mg/L})(0.000303 \text{ MGD})}{(0.0303 + 0.000303)\text{MGD}}$$

$$C_T = \frac{(0.020907) + (0.0009362)}{(0.030603)}$$

$$C_T = \frac{0.0218432}{0.030603}$$

$C_T = 0.71$ mg/L

Thomas and Betts's current daily maximum limit of 0.69 mg/L, for lead, is more stringent than the calculated alternate discharge limit that is based on the metal finishing and acid pickling categorical standards and proportioned by the flow from those two regulated wastestreams.

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Thomas & Betts

Combined Wastestream Evaluation
40 CFR 420

Lead (Pb) 30 day average limit (40 CFR 420) = 0.0000688 lbs/ 1000 lbs product

Thomas & Betts Data:

- 9.5 million lbs/year of acid pickled product
- 8,000 gallons per 1 million pounds of product
- 251 production days per year

(9.5 / 251) x 8,000 = 303 gallons/day

$$\frac{(0.0000688 \text{ lbs})}{(1000 \text{ lbs product})} \times (37{,}849 \text{ lbs of product/day}) = 0.002604 \text{ lbs/day}$$

$$0.002604 \text{ lbs/day} = C_i\,(8.34)\,\frac{(303 \text{ gallons/day})}{\text{MGD}}$$

$C_i = 1.03$ mg/L

Based on actual annual production rates August 2008 to July 2009

Combined wastestream formula:

$$C_T = \frac{(\text{Pb 30 day avg limit})(\text{avg. total daily flow}) + (\text{production based limit})(\text{daily flow from pickling line})}{(\text{avg. total daily flow} + \text{flow from pickling line})}$$

$$C_T = \frac{(0.43 \text{ mg/L})\,(0.0303 \text{ MGD}) + (1.03 \text{ mg/L})(0.000303 \text{ MGD})}{(0.0303 + 0.000303)\text{MGD}}$$

$$C_T = \frac{(0.013029) + (0.000312)}{(0.030603)}$$

$$C_T = \frac{0.013341}{0.030603}$$

$C_T = 0.44$ mg/L

Thomas and Betts's current monthly average limit of 0.43 mg/L, for lead, is more stringent than the calculated alternate discharge limit that is based on the metal finishing and acid pickling categorical standards and proportioned by the flow from those two regulated wastestreams.

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Attachment A-5

City Water & Light
400 E. Monroe Avenue
PO Box 1289
Jonesboro, Arkansas 72403-1289

COPY

August 26, 2014

Thomas & Betts Corporation
Attn: Darryl Worsham
5601 E. Highland Drive
Jonesboro, AR. 72401

Re: Pretreatment Inspection

Permit No: 95-02

Dear Mr. Worsham:

On August 21, 2014, CWL performed a routine pretreatment compliance inspection of your facility in accordance with the CWL Pretreatment Program and the Jonesboro Sewer Use Ordinance. This inspection revealed that you are in compliance with the terms of your permit.

Take note of any comments or minor deficiencies contained in this inspection report. **PLEASE NOTE THAT ANY REQUIRED RESPONSES ARE DUE THIRTY DAYS UPON RECIEPT OF THIS INSPECTION REPORT. FAILURE TO RETURN ANY OF THE REQUIRED RESPONSES BEFORE THE DEADLINE WILL RESULT IN A NOTICE OF VIOLATION.**

Pollution Prevention (P_2) is very important to us at City Water & Light, and so is your company's involvement in P_2. Below I have listed the links for The Southwest Network for Zero Waste and ADEQ's ENVY Award webpage. We at CWL strongly encourage you to post all the success stories that you may have regarding P_2. We need more industries in Jonesboro to post their successes and let everyone else know how well your Industry is doing to reduce waste.

http://www.zerowastenetwork.org

http://www.adeq.state.ar.us/poa/envyaward/envyaward.asp

If I can be of any assistance, please contact me at (870) 935-5581 Ex. 493

Sincerely,

Jody W. Gibson
CWL Pretreatment Specialist

Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

Facility Information

Industry Name: Thomas & Betts

Permit Number: 95-02

Site Address: 5601 E. Highland Dr.
Jonesboro, AR 72401

Mailing Address: Same as Above

Is IU subject to National Categorical Standards? *If yes, list which standard(s).* *40 CFR 433.17*	☑ Yes	☐ No
Has the Industrial User's permit been terminated? *If yes, list date and reason.*	☐ Yes	☑ No
This IU discharges to which POTW?	☑ East	☐ West
Has the Permittee submitted an application for a new permit at least 90 (ninety) days before the expiration date of the current permit? *Applicable only if nearing expiration date of current permit. If yes, list date received and any comments.*	☐ Yes ☑ Not Applicable	☐ No ***Current Permit Expires:*** *5/31/2015*

Information Requirements

. Has the Permittee furnished to CWL within 20 workdays any information which CWL has requested to letermine whether cause exists for modifying, revoking and reissuing, or terminating the Industrial User's ermit, or to determine compliance with the Industrial User's permit?	☑ Yes ☐ Not Applicable	☐ No
. Has the Permittee furnished to CWL within 20 workdays any requested copies of any records required o be kept by the Industrial User's permit?	☑ Yes ☐ Not Applicable	☐ No

Annual Publication

. Was the Permittee included on the list of all industrial users that were subject to enforcement ction(SNC) during the (12) previous months in the most recent annual newspaper publication by CWL? *yes, list date and publication(s) or other media.*	☐ Yes ☐ Not Applicable	☑ No

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

Violation Penalties

1. Has the Permittee been subject to any civil penalties for violating any permit condition? ☐ Yes ☑ No

If yes, list.

2. Has the Permittee been subject to any criminal penalties for willfully or negligently violating permit conditions? ☐ Yes ☑ No

If yes, list

Facility Inspection

General Information

Primary Contact: Darryl Worsham
Title: Health, Safety & Environmental Manager
Telephone: (870) 935-2559 Ext. 3629
E-Mail: darryl.worsham@tnb.com

Additional Contact: John Shatzer
Title: Human Resource Manager
Telephone: (870) 819-3708
E-Mail: john.shatzer@tnb.com

Signatory Authority: Tim Jumper
Title: Plant Manager
Telephone: (870) 935-2559 Ext. 3701
E-Mail: tim.jumper@tnb.com

Corperate Environmental Contact: Om Chopra
Title: N/A
Telephone: 1-800-888-0211
E-Mail: om.chopra@tnb.com

SIC Code(s):	3644	3678					
NAIC Code(s)	334417						

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

Raw Materials: Malleable iron castings, coil steel, zinc.

Process Description: Zinc electroplating.

Products: Electrical connectors.

Pollutants Generated: FOG and metals associated with zinc plating.

Operations Information

	1st Shift	2nd Shift	3rd Shift
Working Hours:	7AM-3PM	3PM-11PM	11PM-7AM
Hours/Day:	8	8	8
Days/Week:	7	7	7

Notes:

Number Of Employees: (Avg.)	Production	Administrative	Total
	335	36	371

Are there any seasonal variations? ☐ Yes ☑ No

If yes, List:

Permit Compliance Appendix

Industrial User Permit

1. Does the facility have a copy of its current Industrial User permit on file and available for inspection? ☑ Yes ☐ No

Comments:

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

General Conditions

1. Is the Permittee in compliance with all conditions of its permit?	☑ Yes	☐ No
If no, list any administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, or summary abatement resulting from noncompliance with the Industrial User's permit.		
2. Has the Industrial User's permit been modified for good causes since the previous inspection?	☐ Yes	☑ No
If yes, list causes and modifications.		
3. Does the IU understand the facilites permit?	☑ Yes	☐ No
4. Does the IU contact have any questions or comments?	☐ Yes	☑ No
4. Does the IU perform self monitorng?	☐ Yes	☑ No
If yes, list below .		
If No: CWL performs all regulartory sampling and analysis or the Samples are sent to an ADEQ certified laboratory for analysis.		
5. Does the IU posses an NPDES permit?	☐ Yes	☑ No
If yes, list below .		
If No: Inform IU that an NPDES permit may be required if there is any wastewater generated directly to the waters of the state of Arkansas	☑ Informed	
3. Has the Permittee increased or decreased the use of potable or process water?	☐ Yes	☑ No
If yes, explain.	☐ Not Applicable	
Increased water use.		
Decreased water use.		

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: Jody Gibson

Report Reviewed By: Jay Earley

General Permit Standards

1. Is the Industrial User discharging wastewater to the POTW;

a) Which create a fire or explosive hazard in the municipal wastewater collection system or POTW, including but not limited to waste streams with a closed-cup flashpoint of less than 140°F (60°C) using the test methods specified in 40 CFR 261.21;	☐ Yes	☑ No
~~b) Having a pH less than 6.0 S.U. or more than 11.5 S.U., or otherwise causing corrosive structural~~ damage to the POTW or equipment or endangering CWL personnel;	☐ Yes	☑ No
c) Having solid or viscous substances in amounts which will cause obstruction of the flow to and within the POTW or result in interference, but in no case solids greater than one half (1/2) inch (1.27 centimeters) in any dimension;	☐ Yes	☑ No
d) Containing pollutants, including oxygen demanding pollutants (BOD_5, 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 or any wastewater treatment or sludge process, or which will constitute a hazard to humans;	☐ Yes	☑ No
e) Having a temperature greater than 150°F (65°C) or that which will inhibit biological activity in the treatment plant and result in interference, but in no case wastewater which causes the temperature at the introduction into the WWTP to exceed 104°F (40°C);	☐ Yes	☑ No
f) Containing petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;	☐ Yes	☑ No
g) Any 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;	☐ Yes	☑ No
h) Any trucked or hauled pollutants, except at discharge points designated by the Manager in accordance with Section 70-88 (5) of this Ordinance;	☐ Yes	☑ No
i) Any noxious or malodorous liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance, a hazard to life, or to prevent human entry into the sewers for maintenance and repair;	☐ Yes	☑ No
j) Any wastewater which imparts color that cannot be removed by the treatment process such as but not limited to dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating CWL's NPDES permit;	☐ Yes	☑ No
k) Containing any radioactive wastes or isotopes except as specifically approved by the Manager in an individual industrial wastewater discharge permit and in compliance with applicable State or Federal regulations;	☐ Yes	☑ No

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CWL

Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

l) Stormwater, surface water, groundwater, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, noncontact cooling water, and unpolluted industrial wastewater, unless specifically authorized by the Manager;	☐ Yes	☑ No
m) Any sludges, screenings, or other residues from the pretreatment of industrial wastes;	☐ Yes	☑ No
n) Any medical wastes, except as specifically authorized by the Manager in an individual or general industrial wastewater discharge permit;	☐ Yes	☑ No
o) Any wastewater causing the treatment plant's effluent to fail a toxicity test;	☐ Yes	☑ No
p) Any wastes containing detergents, surface-active agents, surfactants, or other substances that may cause excessive foaming or scum in the POTW;	☐ Yes	☑ No
q) Any wastes containing fats, oils, or grease (FOG) of animal, vegetable, or mineral origin exceeding one hundred (100) mg/L, except as specifically authorized by the Manager; and	☐ Yes	☑ No
r) Any liquids, solids, or gases which by reason of nature or quantity are or may be sufficient either alone or by interaction with other substances to cause fire or explosion or be injurious in any other way to the POTW or to the operation of the POTW. Wastewater causing two (2) readings on an explosions hazard meter at the point of discharge into the POTW, or at any point in the POTW, of more than 5% or any single reading over 10% of the Lower Explosive Limit of the meter.	☐ Yes	☑ No

Pretreatment Facilities

Pollution Controls

1. Does the Industrial User operate a pretreatment plant, equipment, or otherwise pre-treat its' wastewater prior to discharge to CWL? ☑ Yes ☐ No

If yes, list equipment utilized and/or describes treatment process. Attach copies of any available system drawings or schematics.

If no, skip section.

Comments: Chemical Precipitation, Clarification, Filtration for solids removal, and pH adjustment.

2. Were pretreatment facilities inspected? ☑ Yes ☐ No ☐ Not Applicable

Not applicable if no pretreatment equipment.

3. Number of pretreatment operators on staff: 2

4. Do operators hold State of Arkansas Waste Water Treatment Operator Licenses? ☑ Yes ☐ No

5. If so, list number of employees having each classification of license:

Class I: 2 Matt Emerson Danny Hobbs Class II: Class III: Class IV:

Comments:

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

6. Is the pretreated wastewater discharge Batch or Continuous;	☑ Batch	☐ Continuous
a) If Batch, What is the volume of each batch; 5100GAL.		
b) How many batches are discharged at each time; 1 / 8 per day		
c) What is the duration of each batch discharge; 45min.		

Bypass of Treatment Facilities

1. Has the Permittee bypassed treatment facilities? *If yes, detail below.* *If no, or not applicable, skip section.*	☐ Yes ☐ Not Applicable	☑ No
2. Is bypass unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist?	☐ Yes ☐ Not Applicable	☐ No
3. Is bypass for essential maintenance to assure efficient operation, which does not cause effluent limitations to be exceeded?	☐ Yes ☐ Not Applicable	☐ No
4. Did the Permittee notify CWL of any anticipated bypass by written notice, phone call, or e-mail?	☐ Yes ☐ Not Applicable	☐ No
5. Did the Permittee immediately notify the CWL of any unanticipated bypass?	☐ Yes ☐ Not Applicable	☐ No
6. Did written notice of an unanticipated bypass specify;		
a) A description of the bypass, and its cause, including its duration,	☐ Yes	☐ No
b) Whether the bypass has been corrected,	☐ Yes	☐ No
c) The steps being taken or to be taken to reduce, eliminate, and prevent a reoccurrence of the bypass?	☐ Yes	☐ No

Comments:

Facility Activity Reduction Requirements

1. Is the Permittee's treatment facility experiencing any reduction of efficiency of operation, or loss or failure of all or part of the treatment facility? *If yes, detail below. If no, or not applicable, skip section.*	☐ Yes ☐ Not Applicable	☑ No
2. Is the Permittee attempting to control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided?	☐ Yes	☐ No

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

Removed Substances

1. How is the Permittee disposing of solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters?

List: Generated Sludge is taken to Legacy Landfill.

Process Control Laboratory

1. Does the Permittee operate its' own laboratory for pretreatment process controls? *If yes, list parameters analyzed and any additional comments. If no, skip section.*	☑ Yes(ZINC)	☐ No
2. Is the process control laboratory certified by the State of Arkansas?	☐ Yes	☑ No
3. Number of pretreatment system laboratory technicians on staff:	☐ Yes	☑ No
4. Are laboratory technician(s) certified in wastewater analysis?	☐ Yes	☑ No

Flow Measurement

1. Does the Permittee utilize a wastewater flow meter(s) or water meter(s) for flow determination? *If wastewater meter, list type(s) used and complete section.* *If water meter used, skip section.*	☑ Flow Meter ☐ Water Meter(s) _____ %	
2. Are appropriate flow measurement devices installed, calibrated and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of the type of device being used, including records of verification of maintenance and calibration?	☑ Yes	☐ No
3. Has the Permittee submitted a written certification of the flow measurement device(s) calibration by an independent source qualified to install and/or calibrate flow measurement equipment and has been granted permission by the CWL to use device(s)?	☐ Yes	☑ No
4. Are devices selected capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes?	☑ Yes	☐ No

Accidental Discharge Report

1. Did the Permittee have any occurrence of an accidental discharge of substances prohibited by Ordinance 12:009 or any slug loads or spills that may enter the public sewer? If yes, detail below. If no, skip section.	☐ Yes	☑ No
2. Did the Permittee immediately notify CWL upon the occurrence?	☐ Yes	☐ No
3. Did the Permittee's notification include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken?	☐ Yes	☐ No
4. Did the Permittee submit to CWL a detailed written report within seven days following the accidental discharge?	☐ Yes	☐ No
5. Did the report contain a description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the Permittee's compliance status, including the location of the discharge, type, concentration and volume of the waste?	☐ Yes	☐ No
6. Did the report contain the 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?	☐ Yes	☐ No
7. Did the report contain all steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance?	☐ Yes	☐ No

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

Operating Upset Report

1. Did the Permittee experience any upset in operations that placed the Permittee in a temporary state of noncompliance with the provisions of either the user's permit or with Ordinance 12; 009?
If yes, detail below. If no, skip section. ☐ Yes ☑ No

2. Did the Permittee inform CWL within 24 hours of becoming aware of the upset? ☐ Yes ☐ No

3. Did the Permittee file a written follow-up report of the upset to CWL within 5 (five) days? ☐ Yes ☐ No

4. Did the report contain a description of the upset, the cause(s) thereof, and the upset's impact on the Permittee's compliance status? ☐ Yes ☐ No

5. Did the report contain the duration of noncompliance, including exact dates and times of noncompliance and, if not corrected, the anticipated time the noncompliance is expected to continue? ☐ Yes ☐ No

6. Did the report contain all steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset? ☐ Yes ☐ No

Compliance Schedule Requirements

1. Was the Industrial User under a compliance schedule with CWL? ☐ Yes ☑ No
If yes, attach copy of the Industrial User's compliance schedule. If no, skip section.

2. Did the Permittee submit quarterly compliance reports to the Pretreatment Office? ☐ Yes ☐ No

1st Quarter	2nd Quarter	3rd Quarter	4th Quarter

Records Retention

1. Is the Permittee retaining 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 user's permit, and records of all data used to complete the application for permit, for a period of at least three years from the date of the sample, measurement, report or application? ☑ Yes ☐ No

2. Are all records that pertain to matters that are the subject of special orders or any other enforcement action or litigation activities brought by CWL being 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? ☑ Yes ☐ No

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

Planned Facility Changes

1. Has the Permittee had any facility expansion, production increase, or process modifications, which results in new or substantially increased discharges or a change in the nature of the discharge? *If not applicable, skip next question.*	☐ Yes ☑ Not Applicable	☐ No
2. Did the Permittee give notice to CWL 90 days prior to the above planned changes?	☐ Yes	☐ No
3. Has the Permittee given advance notice to CWL of any planned changes in the permitted facility or activity, which may result in noncompliance with the Industrial User's permit requirements?	☐ Yes	☐ No
4. Is the floor plan current and does CWL have a copy on file?	☑ Yes	☐ No

5. Describe the location and type of sampling facility: The sampling facility is located outside the plant against the South wall near the Southeast corner.

Cost Recoveries And Penalties

1. Has the Permittee been liable and billed for costs incurred for any cleaning, repair, or replacement work caused by any violation or discharge that caused any expense, loss, or damage to or otherwise inhibited CWL wastewater disposal system?	☐ Yes	☑ No

Facility Site Inspection

Spill Prevention/Slug Control

1. Does the facility have a spill prevention plan? *If no, skip next question.*	☑ Yes	☐ No
2. Is a copy of the spill prevention plan on file with CWL?	☑ Yes	☐ No
3. Were the Industrial User's slug control and prevention measures evaluated?	☑ Yes	☐ No
4. Are adequate precautions being taken and proper procedures followed to prevent accidental spills and slug loads?	☑ Yes	☐ No
5. Is there a potential for a direct chemical spill into the sewer system at any location adjacent to a wastestream?	☐ Yes	☑ No

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: Jody Gibson

Report Reviewed By: Jay Earley

Chemical and Hazardous Waste Storage

1. Does the facility have a designated chemical storage area?	☑ Yes	☐ No
2. Did the Industrial Inspector inspect the Chemical Storage Area?	☑ Yes	☐ No
3. Does the IU generate Hazardous Waste?	☑ Yes	☐ No
Toluene, Acetone, Waste aeresol cans, and Potassium Hydroxide.		
4. Does the IU have manifests of their Hazardous Waste disposal?	☑ Yes	☐ No
5. Did the Industrial Inspector inspect the manifests?	☑ Yes	☐ No
6. Is there a sign posted in Chemical Storage Area as to whom to notify in the event of a spill?	☐ Yes	☑ No

Describe Location of Chemical	Does it contain Floor Drains?		If Yes Discharges to?		
1 Pretreatment Area	☐ Yes	☑ No	☐ Pretreatment	☐ Sanitary Sewer	☐ Strom Sewer
2	☐ Yes	☐ No	☐ Pretreatment	☐ Sanitary Sewer	☐ Strom Sewer
3	☐ Yes	☐ No	☐ Pretreatment	☐ Sanitary Sewer	☐ Strom Sewer
4	☐ Yes	☐ No	☐ Pretreatment	☐ Sanitary Sewer	☐ Strom Sewer
5	☐ Yes	☐ No	☐ Pretreatment	☐ Sanitary Sewer	☐ Strom Sewer
6	☐ Yes	☐ No	☐ Pretreatment	☐ Sanitary Sewer	☐ Strom Sewer

Does the Chemical Storage Area Contain any of the following Control Mechanisms?

☑ Dikes,Berms for Containment	☐ Plugs for Floor Drains
☑ Secondary Tanks For Containment	☐ Premix (low) Concentrtions
☑ Alarms	☐ Notification Procedures
☑ Spillcontrol Kits for Cleanup	☐ Chain Restraints, Limited Access
☑ Chemical Desegregation within Storage Area	☐ Other

Chemical Invetory List (MSDS) on file?	☑ Yes	☐ No	☐ Not Applicable
Were any new MSDS reviewed during the inspection?	☐ Yes	☑ No	☐ Not Applicable

If Yes, List Below:

Chemical Storage Comments (type chemicals, handling procedures, usage, controls.....)

Facility Name: Thomas & Betts

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Significant Industrial User Inspection Report

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

Pollution Controls / Pollution Prevention(P^2)

1. Is the Permittee at all times properly operating and maintaining all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with its permit?

Not applicable if no pretreatment equipment, skip section. ☑ Yes ☐ No ☐ Not Applicable

2. Does the Permittee's proper operation and maintenance include;

a) Effective performance;	☑ Yes	☐ No
b) Adequate funding;	☑ Yes	☐ No
c) Adequate operator staffing	☑ Yes	☐ No
d) Adequate laboratory and process controls?	☑ Yes	☐ No

3. Does the Permittee have proper records of operation and maintenance of pretreatment equipment? ☑ Yes ☐ No

1. Does the facility practice pollution prevention?	☑ Yes	☐ No
2. Does this facility have a written pollution prevention plan?	☑ Yes	☐ No
3. Are there any incentive programs offered to employees to reduce pollution/wastes?	☐ Yes	☑ No
4. Does the IU have any recycling programs?	☑ Yes	☐ No

5. Check any of the following Pollution Prevention Activities that may apply:

☑ Spill and leak prevention Procedures.
Explain: Part of Spill Prevention Plan

☐ Water Reuse.
Explain:

☑ Cost Accounting to track savings.
Explain: IU has a program set up to track inventory and savings

☑ Inventory Control.
Explain: Part of the above plan.;

☑ Employee Training.
Explain: Employees are trained on the following programs: Lean 101, Safety, Quality Control, and P-2 Basics.

☐ Spent Solvent Reclamation.
Explain:

☑ Recycling.
Explain: Paper, Aluminum, Cardboard, Pallets, Waste Oil, Solvents, and Lubricants. A-5m

CWL

Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

Manufacturing Facilities

1. Were manufacturing or production facilities inspected?

Not applicable if no manufacturing or production facilities.

☑ Yes ☐ No ☐ Not Applicable

Comments:

Entry And Inspection

1. Has the Permittee allowed CWL or an authorized representative upon the presentation of credentials and other documents as may be required by law 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 user's permit,

☑ Yes ☐ No

b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of user's permit,

☑ Yes ☐ No

c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under user's permit,

☑ Yes ☐ No

d) Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and

☑ Yes ☐ No

e) Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under user's permit, could originate, be stored, or be discharged to the sewer system?

☑ Yes ☐ No

If answered no to any question, detail all instances of noncompliance.

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Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

TTO's (Total Toxic Organics)

If this is not a categorical industry skip this section.

1. Are TTO's (Total Toxic Organics) known to be on the premises? ☐ Yes ☑ No

2. Were TTO's tested twice per year or a previously submitted Toxic Organic Management Plan (TOMP) certification stating the plan is being carried out accompany each Bi-Annual report? ☑ Yes ☐ No

TOMP

1. Has the Permittee submitted a Toxic Organic Management Plan (TOMP), in lieu of testing, and has the Control Authority accepted the plan? ☑ Yes ☐ No

If no, skip section.

If yes, a detailed review of the TOMP, including inspection to verify that the plan, must be performed.

Annual TOMP Review and Inspection

1. Is the inventory of the facility's process TTO compounds current, including the corresponding vendor or supplier Material Safety Data Sheets (MSDS)? ☑ Yes ☐ No

2. Has the Categorical Industrial User (CIU) changed or added process chemicals that contain TTO compounds? ☐ Yes ☑ No

3. If the CIU has changed or added process chemicals that contain TTO compounds, has the Control Authority been notified and has the TOMP been updated to reflect these changes? ☑ Yes ☐ No

4. Is the management plan for approved alternate disposal methods for the originally identified TTO compounds being followed? ☑ Yes ☐ No

5. Are procedures for assuring that TTO compounds located on site do not routinely spill or leak into the waste-stream being adhered to? ☑ Yes ☐ No

6. Is the TOMP current and are adequate management practices being followed? ☑ Yes ☐ No

7. Is the TOMP being properly implemented? ☑ Yes ☐ No

Special Notice: Upon completion of the TOMP review and inspection, evaluate findings and take any appropriate action, as required.

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CWL

Significant Industrial User Inspection Report

Facility Name: Thomas & Betts

Inspection Date: 8/21/14 @ 9:00 AM

Investigators: Jody Gibson and Jay Earley

Report Completed By: _____

Report Reviewed By: _____

Inspection Results and Required Responses

1. Results

On August 21, 2014 Jay Earley and I met with John Shatzer and Darryl Worsham with Thomas & Betts to conduct their annual inspection. No violations were found during this inspection.

2. Required Responses

None

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