

# ADEQ

ARKANSAS  
Department of Environmental Quality

April 16, 2009

Jimmy Cheatham  
President  
Everette Plating  
2570 Columbia 47  
Magnolia, AR 71753

NPDES PERMIT FILE  
NPDES # AR0043613  
AFIN # 14-00059  
Permit PN  
Correspondence  
Technical Backup  
5/10/09 Date Scanned

Re: Everette Plating (Tracking # ARP001029) Pretreatment Compliance Assurance Visit in Magnolia, AR (NPDES #AR0043613)

Dear Mr. Cheatham,

On 12/3/08 a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel to satisfy the requirements of the memorandum of agreement with EPA Region VI in our State's Pretreatment Program implementation procedures to "Randomly sample and analyze the effluent from industrial users and to conduct surveillance activities in order to identify, independent of information supplied by industrial users occasional and continuing noncompliance with pretreatment standards" [see 40 CFR 403.8(f)(2)(v)].

A grab sample was pulled from the batch discharge over an approximate 30 minute period during the CAV and analyzed by ADEQ's laboratory. The analysis shows Everette Plating is compliant with the Maximum Daily & Average Monthly concentration limits in 40 CFR 433, the "Metal Finishing" category.

Pursuant to the inspection ADEQ recommends:

- 1) Cleaning up around the sampling area where the PVC pipe (to the sampling sump) is exposed and enclose if deemed necessary;
- 2) Contact ADEQ's hazardous waste division (Penny Wilson – (501) 682-0868) to help make a determination whether the solid waste generated in the cartridge filters is hazardous waste and;
- 3) Contact Jamal Solaimanian at (501) 682-0629 in the NPDES stormwater section to ascertain whether a storm water permit is necessary or if your facility can apply for a no exposure exemption.

Please find attached various supporting documentation: the "Pretreatment Industrial Inspection", process schematic and ADEQ's "Certificate of Analysis" with its Chain of Custody.

This office wishes to extend its appreciation to you and your staff for the transparent exchange of information and dialogue during the visit. Your willingness to share your process knowledge compliments the true spirit of environmental partnerships.

If there are further questions or comments, please feel free to contact this office at (501) 682-0625 or electronically at [gilliam@adeq.state.ar.us](mailto:gilliam@adeq.state.ar.us) .

Sincerely,



Allen R. Gilliam  
ADEQ State Pretreatment Coordinator

cc: Cindy Garner, Technical Assistance Manager  
Eric Fleming, Technical Assistance Manager  
Penny Wilson, Hazardous Waste Compliance Manager  
Russell Thomas, Magnolia Wastewater System Superintendent, P.O. Box 666, Magnolia,  
AR 71753

Attachments

## Pretreatment Industrial Inspection

### Facility Information

Facility Name: Everett Plating	Site Address: 1920 S. Washington
Signatory Authority (Name & Title): Jimmy Cheatham	Magnolia, AR 71753
Phone: 870.695.3600	Mailing Address (if different): 2570 Columbia 47
Fax: 870.695.3373	Magnolia, AR 71753
Address: same	Corporate Owner Name and address (if applicable):
	N/A
Contact Person (Name & Title): Jimmy Cheatham	
President	Phone:
Phone: same	Fax:
Fax: same	Corporate CEO:
e-mail: Rhonda@jevacmachine.com	e-mail:
Facility Tracking #ARP001029	Last Inspection Date: 6/21/06

POTW (City) IU discharges to: Magnolia, AR      POTW's NPDES #AR0043613

Industrial Classification:     Categorical       Significant Non-Categorical

If Categorical, list which CFR #(s) the facility is subject to: Metal Finishing PSNS (40 CFR 433.17)

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A. Inspection Objectives	
B. Inspection Analysis	
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A. General Information	
B. Facility Permits	
C. Additional Comments	
III. <b>Attachments</b> "Yes" indicates item exists at the facility and attachments will be included	
"No" indicates item does not exist at the facility and attachments aren't necessary	
A. Industrial Processes <i>description</i>	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 4, 5 of 8
B. Pollution Prevention Activities <i>description</i>	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 5, 6 of 8
C. Pretreatment System <i>description</i>	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 6 of 8
D. Chemical Storage <i>description</i>	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 7 of 8
E. Spill/Slug Control Plan <i>slug potential appeared very low</i>	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 7 of 8
F. Self-Monitoring/TOMP	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 8 of 8

Comments :

Inspector's Name (Print):  
Allen Gilliam

Signature: *Allen Gilliam*

IU Rep's Name (Print):  
Jimmy Cheatham

Signature: *Jimmy Cheatham*

Date and Time Inspection Ended: 12/3/08 @ *9:15 AM*  
*~ 2:00 PM*  
*AE*

I. Summary of Inspection			
A. Inspection and Objective (Complete Before Inspection)			
<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Bi-Annual	<input type="checkbox"/> Spill/Slug	<input type="checkbox"/> Unscheduled
<input type="checkbox"/> New Construction	<input type="checkbox"/> Noncompliance	<input type="checkbox"/> Follow-up	<input type="checkbox"/> Complaint
Inspection Objective(s): Compliance Assurance Visit w/grab sampling to verify compliance or non-compliance with numeric standards in CFR 433.17. Slug potential will be evaluated. Pollution Prevention (P2) activities or opportunities will also be discussed. Any other Pretreatment related topics will be discussed to ensure facility rep. is comfortable with all CFR 403.12 reporting requirements.			
Checklist of items to be reviewed and/or visually inspected:			
<input checked="" type="checkbox"/> Pre-inspection Meeting	<input type="checkbox"/> Permit Conditions	<input type="checkbox"/> Safety Concerns	
<input checked="" type="checkbox"/> Process Inspection	<input checked="" type="checkbox"/> Pretreatment Process	<input checked="" type="checkbox"/> TOMP	
<input checked="" type="checkbox"/> Chemical Storage	<input checked="" type="checkbox"/> Discharge point(s)	<input checked="" type="checkbox"/> Spills/Slug Control Plan/Evaluation	
<input checked="" type="checkbox"/> Records Review	<input type="checkbox"/> RCRA information	<input checked="" type="checkbox"/> Process/Flow/Pretreatment Schematics	
<input checked="" type="checkbox"/> IU sampling procedures	<input checked="" type="checkbox"/> Flow/pH Meter(s)	<input type="checkbox"/> Calibration Records	
<input type="checkbox"/> MSDS Inventory List	<input type="checkbox"/> New MSDS	<input type="checkbox"/>	
Comments: Flow measurement is estimated from batch discharges from one of two 275 gallon holding tanks. Work is sporadic, therefore, treated process wastewater is sporadically discharged. This site visit had to coincide with one of their "work" days for sampling.			
B. Inspection Analysis			
Were there any deficiencies/violations identified and noted during the inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Provide a brief narrative of <del>deficiencies/violations or other concerns</del> in the following areas:			
Records Review: MSDS was not on-site but could have been easily retrieved/did not review.			
<p><b>Process Area(s):</b> This company mostly anodizes but, does some conversion coating of aluminum and passivation of stainless steel on outside customers' aircraft parts (See Attachment A-1 for rough schematic). The process area and pretreatment equipment is housed in a single ~60' X ~90' building without any floor drains to the city.</p> <p>Anodizing consists of a series of 16 tanks beginning with an alkaline cleaning tank followed by 2 rinses; an etch tank with sodium hydroxide followed by 2 rinses; a de-smut tank with sulfuric acid &amp; ferric sulfate followed by 2 rinses; anodizing tank (sulfuric acid) followed by 2 rinses; blackening dye tank (seldom used ~ every six [6] months) followed by a rinse with a final nickel acetate sealant followed by a final rinse. All double rinses are countercurrent flowed. Most rinse tanks include recirculating pumps through a cartridge filter to help compliment their use in work tank make-up water via countercurrent flow. All work tanks except for the sulfuric (anodize) work tank are heated and air agitated for maximum process efficiency. Six (6) cartridge filters (~3' long X ~4" diam.) are used to keep work baths and several rinses clean from any solids for recirculation.</p> <p>Conversion coating consists of a fresh water rinse followed by placing workpieces into a tank of sodium fluoborate/chromic acid mix followed by a final rinse. There is no wastewater discharged from this process as they do very little conversion coating.</p> <p>The above tanks are fairly small in volume (~330 gallons) except for the sulfuric acid tank which is ~550 gallons.</p> <p>Passivation consists of an alkaline clean tank followed by a single rinse, a nitric acid tank followed by another single rinse tank, followed by a sodium di-chromate seal tank with a final rinse. All tanks in this process are ~55 gallon capacity. Only a small amount of stainless steel is passivated and process baths may only have to be changed out every 5 to 10 years.</p> <p>Excellent Pollution Prevention (P2) practiced at this facility. See more in P2 section below.</p> <p>Any tanks' spillage or splashes would be captured in surrounding grated floor drain which is fed into facility's pretreatment system.</p>			

**Pretreatment System:** Facility has two (2) preliminary holding tanks where any process rinse overflow is pumped to. This water is sent another small holding "pretreatment" (no real pretreatment, just aerated and pH adjusted) tank then sent through the "Ebbco unit" which includes a basic sock filter then three (3) De-I filters for actual treatment of process rinse wastewater, hex-chrome reduction to tri-chrome and for fresh water make-up. Each Ebbco unit has a mixed cation and anion resin inside (enclosed in a polysateen bag inside a metal container. These are physically removed once the filter is spent. After the Ebbco unit, clean water is sent to another 550 gallon fiberglass holding tank. From there it is pumped to any rinse or process tanks that need make-up water. An OPR meter for measuring TDS/conductivity is used to ensure water is clean enough for re-use.

Self Monitoring Procedures: Sporadic batch discharges are simply grab sampled over the period of the discharge.

Spill/Slug Control Plan: Facility has very small quantities of chemicals stored inside, both powder and fluids. Process area is surrounded by a grated floor drain which is pumped to the holding tanks then the pretreatment system. The entire interior perimeter of the building has an inverted aluminum "V" siliconed to the floor to contain any catastrophic spill from all of their process and treatment tanks. Only by physically opening a valve on one of the two holding (post treatment) tanks can any fluids enter the city's collection system. This auditor would evaluate the potential for a slug discharge from this facility very low.

Sampling Point is just outside the S.E. wall of the building. A 1" PVC drain pipe from one of the holding tanks extends into a small concrete sump. The sump is covered but, the exposed PVC pipe from the building may have some leakage. The area below this small length of exposed pipe had standing milky water standing in it. A rain event had just occurred but, in this auditor's opinion, this area should be cleaned up and also covered.

Chemical Storage: Very little chemical storage inside the building. Sacks of powdered chemicals were segregated and used on an as needed basis. The same could be said of any "bulk" liquid chemicals stored up against the east wall on "spill pallets". Handling procedures only require workers to hand carry, in small containers, any necessary make-up chemicals for the various processes.

**II. Pre-Inspection Meeting**  
**A. General Information**

Date and Time Inspection Started: 12/3/08 @ 9:15 a.m. SIC code(s): 3471

IU Reps/Titles: Jimmy Cheatham/Owner and to an extent his son Craig who supplies workpieces	Control Authority Reps/Titles Allen Gilliam / State Pretreatment Coordinator
---------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------

End product(s): Anodized Al parts; SS Passivation & Conversion Coating of small aircraft and military parts.

Days of Operation: As necessary Approx. # of units produced: N/D

Hours of Operation: As necessary Days of Production (if different): same

Shift 1, hrs.: "about 10 hours/week" Hours of Production (if different): same

# of Employees: 1 to 2 Shift 2, hrs.: N/A to Shift 3, hrs.: N/A to

Are there any scheduled plant shutdowns? Yes  No  N/A  If yes, when? Peak Mos.: sporadic "Off" Mos.:

Are there designated plant clean-up days? Yes  No  N/A  If yes, when? "As needed"

**Is the facility currently in compliance with all pretreatment reporting requirements and limits?** Yes  No

Facility's last semi-annual report dated 7/11/08 indicated a Cr violation (sampled on 4/16/08) at 5.01 ppm. Facility did not notify the Control Authority (ADEQ) of that violation. Subsequent (sample date 5/6/08) indicated a return to compliance w/Cr at 0.896 ppm. Their corrective action was to replace one of their De-I units used for treatment of process rinse wastewater. See facility file's e-mail correspondence.

Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes  No   
Call first to see if there's any work going on and if there's any wastewater to be sampled.

Are there any Safety Concerns or Identified Hazards that the inspector should be aware of:  Yes  No  
If Yes, explain: Safety glasses are required around the process and pretreatment tank(s) area.

**Has there been any changes since the last inspection regarding the following items:**

Plant/flow/process layout? Yes  No  If yes, obtain copy of updated schematic for facility file. (Atch. A-1)

Processes? Yes  No  If yes, explain: 1. Change in conversion coat line and 2. Added Passivation

Production Levels? Yes  No  If yes, explain: Added processes allowed for additional parts to be brought in.

Raw materials? Yes  No  If yes, explain: Stainless steel, nitric and sulfuric acid, sodium dichromate.

Flow rates? Yes  No  If yes, explain: New passivation process does not add substantially to the wastewater generated and there's no wastewater discharge from the conversion coating line.

Are regulated and non-regulated wastestreams combined? yes  no

Prior to Pretreatment System? yes  no  N/A

If Yes, was the CWF used to calculate limits? yes  no  N/A

Prior to connection to the POTW sanitary sewer? yes  no  N/A

At connection to sanitary sewer? yes  no  N/A

Production and flows verified for Production-Based Standards? yes  no  N/A

**B. Facility Permits**

Permit Type	Permit No.	Expiration Date
Air	N/A	
RCRA	May need to contact for possible small quantity conditionally exempt status	Contact Penny Wilson at (501) 682-0868 for guidance
NPDES	N/A	
Storm Water	May need to contact ADEQ for storm water permit or seek exemption.	Contact Jamal Solaimanian at (501) 682-0629 for guidance

**C. Additional Comments**

**(Note which section or attachment comments are regarding)**

**Permits:** The facility representative should contact ADEQ's hazardous waste and Public Outreach division contacts to ascertain whether they need a hazardous waste generator ID number and/or a storm water permit/exemption.

**Attachment A: Industrial Process(es)**

List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not

1. Cr conversion coating (no process w.w. discharge)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Various Rinse overflows	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Passivation (seldom used)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5.	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Anodizing	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	6.	Yes <input type="checkbox"/> No <input type="checkbox"/>

Were processes visually inspected? Yes  No  N/A

Brief description of process(es): See above Section I.B. under "process area". Conversion coating line does not have a wastewater discharge.

General observations of facility's indoor housekeeping: Interior of building around the process and pretreatment area appeared in good order and clean with evidence of some slight leakage near the anodize line. A small portion of the concrete floor showed evidence of some corrosion.

General observations of area outside facility's building: A complete "walk-around" was not conducted but, as previously mentioned, the area from the wastewater (PVC) discharge pipe from the S.E. outside corner of the building to the sampling "sump" could be cleaned up somewhat and covered or protected in some way.

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured (M) or estimated (E). If batch (B) discharged, list frequency and volume (1000 gal/month, e.g.).

<input checked="" type="checkbox"/> Process Rinse Overflows – Batch discharged at ~130 to 200 gallons/two weeks	<input type="checkbox"/> Equip. Cleanup	<input type="checkbox"/> Floor Cleanup	<input type="checkbox"/> Spent Bath Solutions
<input type="checkbox"/> Product Cleaning	<input type="checkbox"/> Forklifts Maint./Wash	<input type="checkbox"/> Tank Dragout	<input type="checkbox"/> Air Pollution Devices
<input type="checkbox"/> Boiler Blowdown	<input type="checkbox"/> Spent Rinse Tanks	<input type="checkbox"/> Equipment Coolants	<input type="checkbox"/> Non-Contact Cooling Water

List Major Raw Materials and Chemicals used:  
 Potassium Hydroxide, sodium hydroxide, sulfuric acid, chromium acid, ferric sulfate, nickel acetate, sodium fluoroborate, nitric acid, sodium dichromate, aluminum and stainless steel.

Check Waste Stream Pollutants of Concern from Process(es)

Metals (List) All from CFR 433  Solvents (List): None on site.

pH

Are there floor drains in the Process area?  Yes  No If yes list number and the location of all floor drains:

**Attachment B: Pollution Prevention (P2) / Recycling Activities**

Does the facility have a written P2 Plan? Yes  No

Does this facility practice P2? Yes  No

Environmental Management System in place? Yes  No

ISO Certified? Yes  No

Written Standard Operating Procedures? Yes  No

Explain:

Preventative Maintenance Program Yes  No  (hydraulic systems, valves, pumps, etc)

Explain: Leaks, repairs or replacement is done on an as needed basis.

Water Reuse: Yes  No

Explain: Counter current rinses

Cost Accounting to Track Savings: Yes  No

Explain:

Inventory Control / "Green Purchasing": Yes  No  (lean manufacturing/"env. friendly purchasing", etc)

Explain:

Employee Training: Yes  No

Explain: As needed.

Spent Solvent Reclamation? Yes  No  N/A

Explain:

Recycle Paper, Aluminum, Boxes, and Pallets? Yes  No

Explain:

Recycle Waste Oil, Solvents, and Lubricants? Yes  No  N/A

Explain:

Other P2 Activities: See below	
P2 Equipment/Practices in use:	
<input checked="" type="checkbox"/> Polyester floating balls for heat retainment	<input checked="" type="checkbox"/> Countercurrent Rinsing
<input type="checkbox"/> Dragout Collection Trays	<input type="checkbox"/> Seal-Less Pumps
<input type="checkbox"/> Air Jets to Blow Parts Dry	<input checked="" type="checkbox"/> Secondary Containment of Process Solutions
<input checked="" type="checkbox"/> Heated process tanks for most efficient operation	<input type="checkbox"/> Bead Blasting to Remove Paint
<input checked="" type="checkbox"/> Process tank air agitation	<input checked="" type="checkbox"/> De-I units for make up water
<input checked="" type="checkbox"/> In-Process Recycle (Cartridge filters)	<input checked="" type="checkbox"/> Conductivity Meters
<input type="checkbox"/> Dead Rinse Tanks	<input checked="" type="checkbox"/> Bath / Rinse Filtration

**Attachment C: Pretreatment System**

Are wastestreams segregated before pretreatment?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
Are they pretreated prior to discharge to the sanitary sewer?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Was the pretreatment system visually inspected during this visit?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:

<input checked="" type="checkbox"/> De-I units	<input type="checkbox"/> Membrane Tech.	<input type="checkbox"/> Ion Exchange	<input type="checkbox"/> Biological Treatment
<input type="checkbox"/> Centrifugation	<input type="checkbox"/> Flow Equalization	<input type="checkbox"/> Ozonation	<input type="checkbox"/> Chlorinating
<input type="checkbox"/> Chemical Precipitation	<input type="checkbox"/> Oil/Water Separation	<input type="checkbox"/> Reverse Osmosis	<input type="checkbox"/> Grit Removal
<input type="checkbox"/> Sludge Filter Press	<input type="checkbox"/> Grease Trap	<input type="checkbox"/> Screen	<input type="checkbox"/> Solvent Separation
<input checked="" type="checkbox"/> pH Adjustment	<input type="checkbox"/> Sand Trap	<input type="checkbox"/> Sedimentation	<input type="checkbox"/> Silver Recovery

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order): As described in Section I.B. above, pretreatment is fairly simple with the De-I units acting as treatment of any overflow rinses.

Does the description match the schematic currently on file?  Yes  No  N/A

System Operator(s) Name: Diane Fields

Does discharge permit require licensed operator?  Yes  No  N/A

Is the System Operator(s) licensed by the State of Arkansas (per Reg. # 3?)  Yes  No  N/A

List Name(s) and License classification: N/A

Is training provided to the Pretreatment System Operator(s)?  Yes  No  N/A

Pretreatment system is automated and sent to a holding tank where pH is checked before discharged.

Is the discharge from the Pretreatment System?  Batch  Continuous  Combination

If any discharges are batch type or combination, describe the following:

Volume of each batch: ~130 to ~200 gallons per 2 weeks.

Describe process from which batch originated (spent bath, e.g.): Anodizing and passivation overflow rinses.

Approximate duration of batch discharge: No more than an hour.

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
?	They just bought a new totalizer	None



<b>Attachment D: Chemical Storage Area(s)</b>		
Does the facility have a designated chemical storage area(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Was this area(s) visually inspected? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. See Section I.B. above. This is a small facility and only has a small inventory of stored chemicals	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
2. Process area	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
<input checked="" type="checkbox"/> Dikes, "Berm" for containment around the entire inside perimeter of building		
<input type="checkbox"/> Secondary Tanks for Holding	<input checked="" type="checkbox"/> Grated floor drain surrounding process tank(s) area	
<input type="checkbox"/> Alarms	<input type="checkbox"/> Chain restraints, limited access	
<input checked="" type="checkbox"/> Spills Control Kits for Cleanup	<input type="checkbox"/> Notification Procedures	
<input checked="" type="checkbox"/> Chemical segregation within Storage Areas	<input type="checkbox"/> Other	
Chemical Inventory List (MSDS) on file? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A (in other building)		
Were any new MSDS reviewed during the Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		
If yes, list below:		
Chemical storage comments: Adequate, orderly and clean.		
Chemical Handling procedures: As described previously, only small quantities are needed for their processes. Employees hand carry necessary chemicals to process tanks in small containers as needed. Any bulk liquid in barrels are unloaded at the front sliding doors, "man handled" and rolled on their edge to their storage area.		
<b>Attachment E: Spill/Slug Control Plan</b>		
Does the facility have a Spill/Slug control plan? Potential deemed very low.		<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?		
Is the spill/slug control plan <2 years old?		<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(A) Describes discharge practices including non routine batch (slug) discharges		<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(B) Describes storage and handling of chemicals		<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(C) Procedures for immediate notification to POTW of slug discharges		<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants		<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
2. Describes procedures and equipment for emergency response		<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
3. Describes follow-up to limit damage suffered by POTW or environment		<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
4. Does the facility have Spill/Slug Notification Procedures posted?		<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?		<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
If no: N/A		
Does the facility have Spill/Slug Notification Procedures posted?		<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
Is it posted in areas where chemicals are used and stored?		<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
If Yes how many?		
Have there been any non-routine, episodic discharges or chemical spills in the past year?		<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
(Briefly Describe, Include Dates)		
Was the City notified of these occurrences? <input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A		

Visual Inspection of Discharge Lines/Points				
Provide description of manhole condition and flow channel of the following where applicable:				
Sampling / Monitoring Point: 1" PVC pipe extending into small in-ground covered sump. Adequate.				
Total Flow Monitoring Point: New flow totalizer has been installed on PVC pipe.				
Point of Connection: Directly to the City's sewer system.				
Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements				
Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title. Owner or operator takes a grab sample of the facility's batch during the brief period the small quantity is discharged.				
Where is the sample point located? S.E. corner near outside wall of the building				
<input type="checkbox"/> End of Process	<input checked="" type="checkbox"/> Pretreatment Effluent	<input type="checkbox"/> Total Flow		
<input type="checkbox"/> Combined Flow	<input type="checkbox"/> Metered Flow	<input type="checkbox"/> Flow Actuator		
<input type="checkbox"/> Private Manhole	<input type="checkbox"/> Utility Manhole	<input type="checkbox"/> Advance Notice Required		
Is the Sample Collection Site Adequate? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A				
Does the facility rep. request a split sample on this sampling/inspection?				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the facility perform self-monitoring tests in-house?				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
If no, record the name and address of Contract Lab: Environmental Testing & Consulting (Memphis)				
Automatic Sampler <input type="checkbox"/> or Manual grab <input checked="" type="checkbox"/>				
IU Self-Monitoring Results reviewed:				
Is the Contract Lab certified by ADEQ for test parameters?				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Dates and Times of Sample Analysis Recorded?				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Were correct Sample Types Collected				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Dates and times of Sample Collection Recorded?				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Were Samples preserved correctly (refer to 40CFR Part 136)				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Were Self Monitoring records on file for past 3 years?				<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
List the parameters the facility monitors and the frequency: minimum 2/yr				
<input checked="" type="checkbox"/> Cd(t)	<input checked="" type="checkbox"/> Cu(t)	<input checked="" type="checkbox"/> Cr(t)		
<input checked="" type="checkbox"/> Ag(t)	<input checked="" type="checkbox"/> Zn(t)	<input checked="" type="checkbox"/> pH	<input checked="" type="checkbox"/> Ni(t)	<input checked="" type="checkbox"/> Pb(t)
<input type="checkbox"/> TTO (they certify)	<input checked="" type="checkbox"/> CN'(t)	<input type="checkbox"/> CN'(a-c)		
Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433				
How does the IU report TTO? <input type="checkbox"/> Analysis <input checked="" type="checkbox"/> Certification Statement				
Does the facility have a Toxic Organic Management Plan? <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No <input type="checkbox"/> N/A				
If yes, Does the plan show how toxic organics are used, stored, and disposed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No* <input type="checkbox"/> N/A **"none on-site"				
List the date of the last revision to the TOMP: 8/05				
Is the TOMP being followed as written? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A (If no, provide explanation in comments.)				
If no, is there evidence that a TOMP is needed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A (If yes, provide description of evidence in comments.)				
Comments: No toxic organics in toxic amounts on site. Workpieces are brought in pre-cleaned of any mill oil. Cleaning with solvents not necessary. Only small quantities of WD-40 and lubricating oil for hoist system was seen on-site.				

INE CORNER BUILDING 90 L.F

EPI PROCESSING AREA IS BELOW.

TANKS FLUID TREAT DATA

- #1 - Chlorine
- 30" x 48" CAP. 2 Rinse
- 86" 3 Rinse
- 330 gal 4 Seal - sodium hydroxide (Filtered)
- 5 Rinse
- 6 Rinse
- 7 Desinf - Sulfur / persulfate (Filtered)
- 8 Rinse (Filtered)
- 9 Rinse
- 550 gal 10 Analogy - sulfuric
- 11 Rinse (Filtered)
- 12 Rinse
- 13 Dye - Black
- 14 Rinse
- 15 Seal - methyl acetate
- 16 Rinse

STORAGE PAW MATERIAL DRUMS

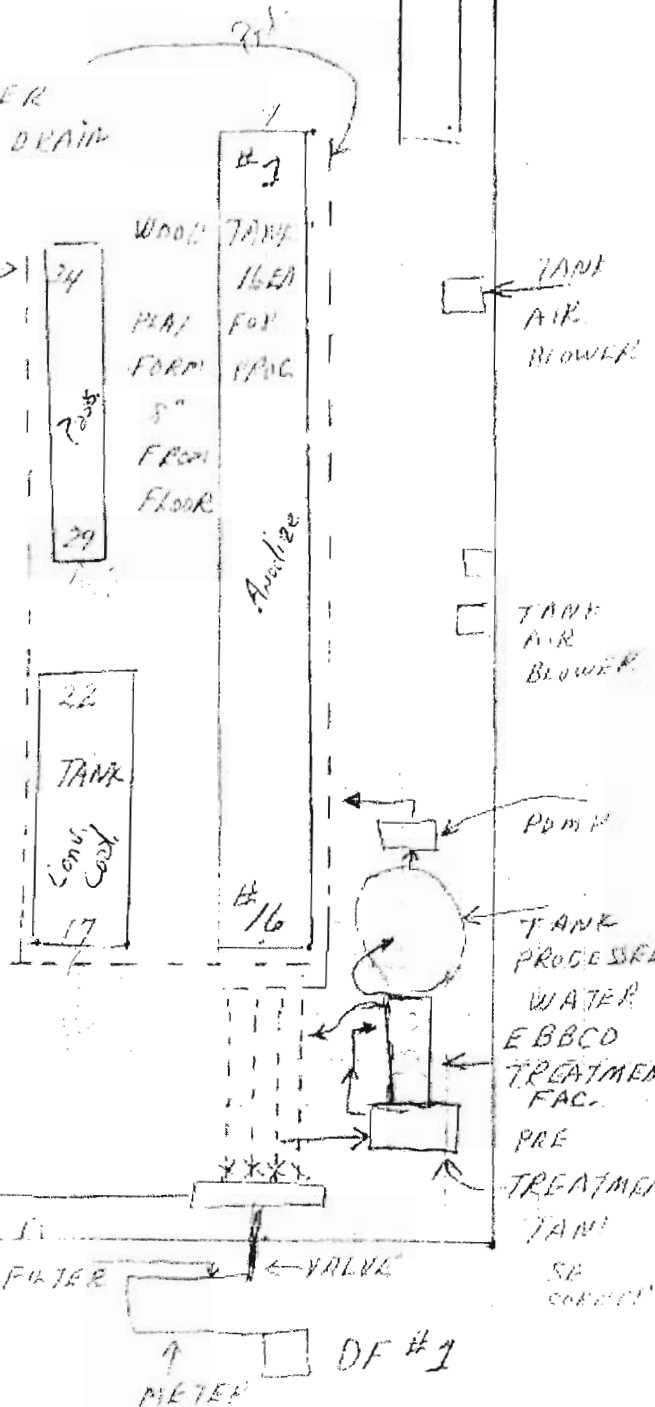
CITY WATER AND TANK DRAIN

FLUID TANK DATA

- 30" x 48" CAP: 330 GAL 17 Rinse { sodium fluoride
- 86" 18 Low Coat. { chromic acid (Hex Cr?)
- 19 Rinse
- 20 SPARE
- 21 SPARE
- 22 SPARE

FLUID TANK DATA

- #29 - Chlor Sulfur #1
- 24" Cube 30 Rinse
- Cap: 55 gal. 31 Nitric acid
- 32 Rinse
- 33 Seal - sodium metacrylate
- 34 - Rinse



# Arkansas Department Of Environmental Quality

5301 Northshore Drive  
North Little Rock, AR 72118

## - CERTIFICATE OF ANALYSIS -

Attn:

Phone:

Ext:

FAX:

Our Lab#: 2008-3456

Your Sample ID: ~~SAPA~~ - Everett Plating

Sample X ~~AG~~

Report Date: 12-Dec-08

ICP/MS-T

Aluminum		1780	µg/L	12/11/2008	20	20
Antimony	<	100	µg/L	12/11/2008	5	10
Arsenic	<	10.0	µg/L	12/11/2008	0.5	1
Barium	<	100	µg/L	12/11/2008	2	10
Beryllium	<	5.00	µg/L	12/11/2008	0.1	0.5
Boron		3160	µg/L	12/11/2008	5	25
Cadmium	<	10.0	µg/L	12/11/2008	0.3	1
Calcium	<	0.400	mg/L	12/11/2008	0.04	0.04
Chromium		20.7	µg/L	12/11/2008	0.3	1
Cobalt	<	10.0	µg/L	12/11/2008	0.5	1
Copper		45.1	µg/L	12/11/2008	0.5	1
Iron	<	200	µg/L	12/11/2008	10	20
Lead	<	10.0	µg/L	12/11/2008	0.1	1
Magnesium	<	1.00	mg/L	12/11/2008	0.1	0.1
Manganese	<	10.0	µg/L	12/11/2008	0.2	1
Nickel	<	25.0	µg/L	12/11/2008	0.5	2.5
Potassium	<	1.00	mg/L	12/11/2008	0.05	0.1
Selenium	<	20.0	µg/L	12/11/2008	0.5	2
Silicon Dioxide		7.43	mg/L	12/11/2008	0.02	0.2
Silver	<	50.0	µg/L	12/11/2008	1	5
Sodium		149	mg/L	12/11/2008	0.02	0.04
Thallium	<	25.0	µg/L	12/11/2008	0.5	2.5
Vanadium	<	25.0	µg/L	12/11/2008	1	2.5
Zinc		65.5	µg/L	12/11/2008	2	3

