

ADEQ

ARKANSAS
Department of Environmental Quality

May 23, 2012

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

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

Dear Mr. Cheatham,

On 4/4/12, a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel at your facility as required under 40 CFR 403.8(f)(2)(v). The CAV indicated Everette Plating is in compliance with the Federal Metal Finishing Pretreatment limitations in 40 CFR 433.17.

Requirements:

- 1) Please submit within thirty (30) days from the date on this correspondence, any potential reasons why chromium was above the regulatory limit during the last grab sample taken on 4/4/12. During the time I was on-site, there were no process changes I could discern.
- 2) Please submit within thirty (30) days from the date on this correspondence a more comprehensive wastewater flow depicting the directional flow from your pretreatment system (directly from the Ebbco unit?) to the final discharge/sampling point on Attachment A-1c (your schematic's page 3 of 3). This will bring Everette Plating more in line with the requirements of 40 CFR 403.12(b).

Comments:

- 1) The updated wastewater flow provided during the CAV did not indicate flow direction(s) from regulated wastewater generation to the final discharge/sampling point. Attachment A-1 consists of process/wastewater schematics which are still not clear to this office, specifically the route the wastewater takes through your pretreatment system to the final discharge point. It was agreed during the visit a more detailed schematic was to be created.
 - a. The subsequent e-mailed flow schematic through your pretreatment system to the final discharge point still did not indicate a directional flow line from the Ebbco unit (if that is truly the procedure) to the final discharge/sampling point to the City.
- 2) The first grab sample taken of your wastewater at 8:05 a.m. indicated compliance with all parameters in 40 CFR 433.17, but the second sample taken at 12:25 p.m. indicated an excursion of the Metal Finishing chromium monthly average limit of 1.71 mg/l (see ADEQ's sample analysis, Attachment A-2).

- a. Because the two samples were taken on the same day their results (0.353 and 1.94 mg/l) were averaged and met the monthly average limit of 1.71 mg/l in 40 CFR 433.17.
 - b. It is strongly recommended to take more than one grab sample during your batch discharges to verify compliance. Several grab samples taken during the batch discharge period would be more representative.
- 3) If Everette Plating can achieve a “no discharge status” situation this office can foresee no reason why this avenue is not taken.

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 any errors in this office’s description of your processes or pretreatment within the CAV please advise.

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 .

Sincerely,



Allen Gilliam
ADEQ State Pretreatment Coordinator

Attachments: Everette Plating Compliance Assurance Visit; current wastewater flow schematics from Everette Plating and ADEQ’s lab analysis of two grab samples taken at Everette Plating on 4/4/12.

cc: Russell Thomas, Magnolia Wastewater System Superintendent, P.O. Box 666, Magnolia, AR 71753

Pretreatment Industrial Inspection

Facility Information

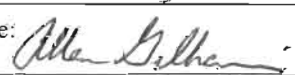
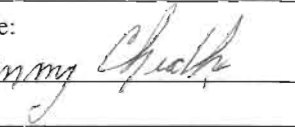
Facility Name: Everett Plating	Site Address: 1920 S. Washington
Signatory Authority (Name & Title): Jimmy Cheatham	Magnolia, AR 71753
Phone: 870.695.3600	Mailing Address (if different): 2570 Columbia 47
Fax: 870.695.3373	Magnolia, AR 71753
Address: same	Corporate Owner Name and address (if applicable):
	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: 12/3/08

POTW (City) IU discharges to: Magnolia, AR	POTW's NPDES #AR0043613
Industrial Classification: <input checked="" type="checkbox"/> Categorical	<input type="checkbox"/> 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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C. Additional Comments	
III. Attachments "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	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 4 of 8
B. Pollution Prevention Activities	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 5 of 8
C. Pretreatment System	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 6 of 8
D. Chemical Storage	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 7 of 8
E. Spill/Slug Control Plan	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: 
IU Rep's Name (Print): Jimmy Cheatham	Signature: 
Date and Time Inspection Ended: 4/4/12 @ 12:30 pm	

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 the Federal Pretreatment Requirements in 40 CFR 403 and the numeric limitations in CFR 433.17.

Checklist of items to be reviewed and/or visually inspected:

<input checked="" type="checkbox"/> Pre-inspection Meeting	<input type="checkbox"/> Permit Conditions	<input checked="" 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 taken from their flow totalizer. 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? Yes No

Provide a brief narrative of ~~deficiencies/violations or other concerns~~ in the following areas:

Records Review: MSDS was not on-site but could have been easily retrieved/did not review.

Process Area(s): The facility has not substantially changed its operations since the last CAV in 12/08. It mainly anodizes, but does some conversion coating of aluminum and passivation of stainless steel on outside customers' aircraft parts (See Attachment A-1 for process and wastewater flow schematic). The entire process area and pretreatment equipment is housed in a single ~60' X ~90' building without any floor drains to the city.

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 & ferric sulfate followed by 2 rinses; anodizing tank (sulfuric acid) followed by 2 rinses; blackening dye tank (seldom used ~ every 6 to 8 months) followed by a rinse with a final nickel acetate sealant followed by a final rinse. All double rinses are countercurrent flowed. Some rinse tanks include recirculating pumps through cartridge filters for re-use as 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. Cartridge filters (~3' long X ~4" diam.) are used to keep some work baths and several rinses clean from solids for recirculation.

Conversion coating consists of a fresh water rinse followed by placing workpieces into a tank of sodium fluoroborate /chromic⁶ acid mix followed by a final rinse. There is no wastewater discharged from this process as they do very little conversion coating.

The above tanks are fairly small in volume (~330 gallons) except for the sulfuric acid tank which is ~550 gallons.

Passivation of stainless steel 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 fresh water 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.

Excellent Pollution Prevention (P2) practiced at this facility. See more in P2 section below.

Any tanks' spillage or splashes would be captured in surrounding grated floor drain which is fed into facility's pretreatment system.

Pretreatment System: (See Attachment A-1c) All process rinse overflow waste water is pumped to two process holding tanks. The wastewater is sent through a filter press (11 plate) with the "clean water" being sent to another small holding tank (aerated and pH adjusted) then sent through the "Ebbco unit" which includes a polyester pre-filter (5 micron) bag, then three ion exchange mixed bed resin chambers/cylinders (in series) for treatment of process rinse wastewater, hex-chrome reduction/removal and for fresh De-I water make-up. Each Ebbco unit has a mixed cation and anion resin bed 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 1,000 gallon polypropylene holding tank. From there it is pumped to any rinse or process tank that needs make-up water. An ORP meter is used for measuring TDS/conductivity is used to ensure water is clean enough for re-use. The facility rep. indicated they could achieve no discharge with the adequate holding tank storage they have capable of being recirculated through the Ebbco unit for complete water re-use. Batch discharges are directly from the Ebbco unit, but not indicated on the schematic.

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 aluminum "L" siliconed to the floor to contain any catastrophic spill from all of their process and treatment tanks. Only by physically opening a valve on the Ebbco Unit 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 the Ebbco unit flows thru a filter and the treated waste water is sampled at a 1" vertical "T" after opening a PVC valve. The "pretreatment" system was e-mailed this office on 5/7/12, but did not include the line showing where wastewater is periodically batch discharged to the City.

Chemical Storage: Very little chemical storage inside the building. Barrels of powdered chemicals are 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: 4/4/12 @ 7:50 a.m.		SIC/NAICS code(s): 3471/332813	
IU Reps/Titles: Jimmy Cheatham/Owner and Rhonda Beckner/Compliance Coordinator		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. 800 lbs/shift produced	
Hours of Operation: 6:00 a.m. to 4:30 p.m.		Days of Production (if different): same	
Shift 1, hrs.: "about 10 hours/week"		Hours of Production (if different): same	
# of Employees: 4	Shift 2, hrs.: N/A to	Shift 3, hrs.: N/A to	
Are there any scheduled plant shutdowns? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If yes, when?		Peak Mos.: sporadic	"Off" Mos.:
Are there designated plant clean-up days? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If yes, when? "As needed"			
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Contact with the facility rep. is required to determine if there is any work in progress and if there is any wastewater to be sampled.			
Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: <input checked="" type="checkbox"/> Yes. <input type="checkbox"/> 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, obtain copy of updated schematic for facility file.			
Processes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Production Levels? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: Production has increased.			
Raw materials? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Flow rates? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Are regulated and non-regulated wastestreams combined?		yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>
Prior to Pretreatment System?		yes <input type="checkbox"/>	no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
If Yes, was the CWF used to calculate limits?		yes <input type="checkbox"/>	no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Prior to connection to the POTW sanitary sewer?		yes <input type="checkbox"/>	no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
At connection to sanitary sewer?		yes <input type="checkbox"/>	no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
Production and flows verified for Production-Based Standards?		yes <input type="checkbox"/>	no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
B. Facility Permits			
Permit Type	Permit No.	Expiration Date	
ADEQ Pretreatment	ARP001029 (tracking number)	N/A	
NPDES Stormwater	ARR000981		
C. Additional Comments			
(Note which section or attachment comments are regarding)			
Facility contact was given ADEQ's storm water engineer supervisor's number for possible "No exposure" exemption. The above Stormwater permit is in the process of being issued.			
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			
Brief description of process(es): See above Section I.B. under "process area.			
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: Clean and uncluttered.			

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured or estimated. If batch 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 pH Solvents (List): None on site.

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 ISO 9001:2008 AS0100C

Written Standard Operating Procedures? Yes No

Explain:

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

Explain: Leaks, repairs or replacement is conducted 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 Equipment/Practices in use:	
<input checked="" type="checkbox"/> Polyester floating balls for heat retainment	<input checked="" type="checkbox"/> Countercurrent Rinsing
<input checked="" type="checkbox"/> Filter Press	<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"/> Holding and work tanks 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 checked="" 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

Facility rep. indicated future installation of an R/O unit as well as a Penetrant Inspection System.

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 Ebbco unit treating any overflow rinses.

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

System Operator(s) Name: Diane Fields and Blake Henson (operator in-training)

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 discharge.

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.

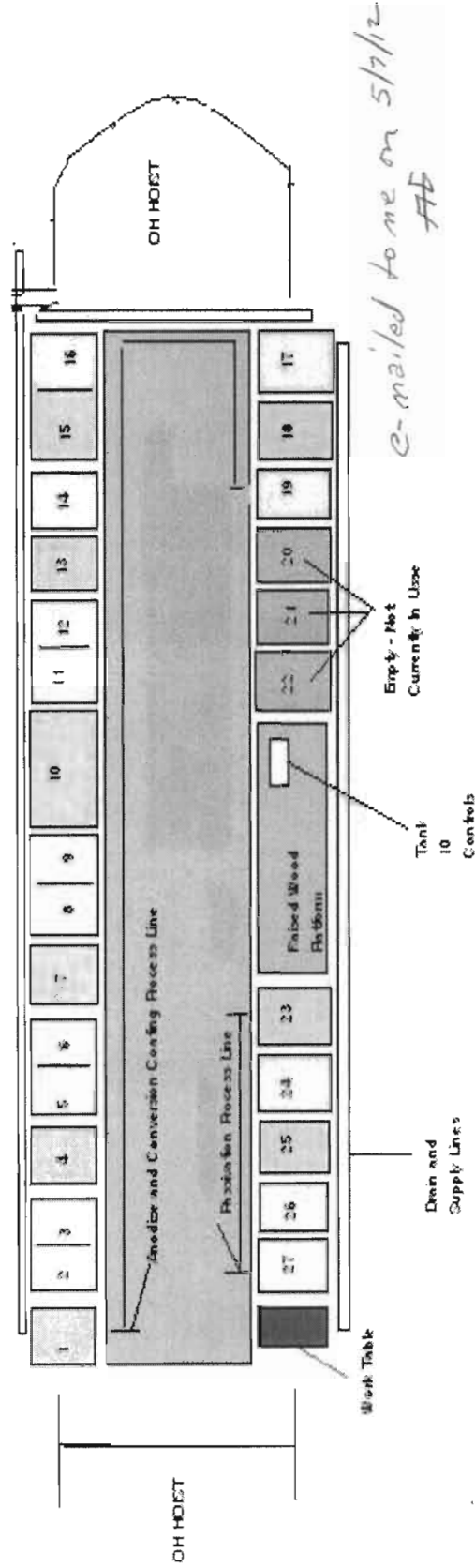
Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
Neptune		None

Attachment D: Chemical Storage Area(s)		
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"/> Aluminum "L" siliconed to the floor 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.		
Attachment E: Spill/Slug Control Plan		
Does the facility have a Spill/Slug control plan? Slug discharge 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?		
Has there been any non-routine, episodic discharges or chemical spills in the past year?		<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
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 outside the S.E. part of the building.				
Total Flow Monitoring Point: A flow totalizer is 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 from the 1" PVC pipe valve just outside the SE corner of the building. Sample bottles are provided by an ADEQ certified lab with proper preservatives already in them.				
Where is the sample point located? S.E. corner of the building's outside wall.				
<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 checked="" 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"/> Cr(t)	<input checked="" type="checkbox"/> Cu(t)	<input checked="" type="checkbox"/> Pb(t)	<input checked="" type="checkbox"/> Ni(t)
<input checked="" type="checkbox"/> Ag(t)	<input checked="" type="checkbox"/> Zn(t)	<input checked="" type="checkbox"/> pH	<input type="checkbox"/> TTO (they certify)	<input checked="" type="checkbox"/> CN(t)
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 is not necessary. Only small quantities of WD-40 and lubricating oil for hoist system was seen on-site.				

Everette Plating Inc.
 1920 S. Washington
 Magnolia, AR. 71753

Attachment A-1



Tank Key:

- #1 Clean
- #2 Rinse
- #3 Rinse
- #4 Etch – Sodium Hydroxide
- #5 Rinse
- #6 Rinse
- #7 DeSmut – Sulfuric Acid/Ferric Sulfate
- #8 Rinse
- #9 Rinse
- #10 Anodize – Sulfuric Acid
- #11 Rinse
- #12 Rinse
- #13 Dye – Black
- #14 Rinse
- #15 Seal – Nickel Acetate
- #16 Rinse
- #17 Rinse
- #18 Conversion Coat – Chromium (VI) Oxide
- #19 Rinse
- #20 Spare – Not In Use
- #21 Spare – Not In Use
- #22 Spare – Not In Use
- #23 Clean
- #24 Rinse
- #25 Passivate – Nitric Acid
- #26 Rinse
- #27 Seal – Sodium Dichromate
- #28 Rinse

Tanks Sizes:

- Tanks 1-9; 11-22 30" x 48" x 60" Capacity 330 Gallons
- Tank 10: Capacity 550 Gallons
- Tanks 23-28: 24" Cube Capacity 55 Gallons

A-16

Attachment A-2



5301 Northshore Drive
North Little Rock, AR 72118
Telephone: 501-682-0744

Client Report For: Everette Plating 2012 1032-1033
Attention:
Client Address:

Report Date: April 26, 2012
LAB ID: AR12APR04-09
Comment:

Approved By: Allen Gillman

Date: April 26, 2012

Arkansas Department of Environmental Quality
 5301 Northshore Drive
 North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr
 Ruehr@adeq.state.ar.us
 501-682-0955

Client: Special Samples

Client Sample ID: Everette Plating # 1

Lab ID: 2012-1032

Collection Date: 4/4/2012 8:05:00 AM

Matrix: Water

Analyses

Total Metals by EPA 200.8

EPA 200.8

Batch: 12041603 Run: 1

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	8220	200	20		ug/L
Antimony	<100	100	5		ug/L
Arsenic	<10	10	0.5		ug/L
Barium	<100	100	2.0		ug/L
Beryllium	<5	5	0.1		ug/L
Boron	3500	250	5.0		ug/L
Cadmium	<10	10	0.3		ug/L
Calcium	2.45	0.4	0.04		mg/L
Chromium	353	10	0.3		ug/L
Cobalt	<10	10	0.5		ug/L
Copper	68.0	10	0.5		ug/L
Iron	567	200	10.0		ug/L
Lead	42.4	10	0.1		ug/L
Magnesium	<1	1	0.1		mg/L
Manganese	25.1	10	0.2		ug/L
Nickel	120	25	0.5		ug/L
Potassium	<10	10	0.05		mg/L
Selenium	<20	20	0.5		ug/L
Silver	<50	50	1.0		ug/L
Sodium	150	0.4	0.02		mg/L
Thallium	<25	25	0.05		ug/L
Vanadium	<25	25	1.0		ug/L
Zinc	106	30	2.0		ug/L
Dilution Factor	1				
Analyzed By	Joe Semberski				
Analysis Date/Time	Apr 13 2012 10:59AM				
Prep By					
Prep Date/Time					

Arkansas Department of Environmental Quality
 5301 Northshore Drive
 North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr
 Ruehr@adeq.state.ar.us
 501-682-0955

Client: Special Samples

Client Sample ID: Everette Plating # 2

Lab ID: 2012-1033

Collection Date: 4/4/2012 12:25:00 PM

Matrix: Water

Analyses

Total Metals by EPA 200.8

EPA 200.8

Batch: 12041603 Run: 1

	<u>Result</u>	<u>Reporting Limit</u>	<u>MDL</u>	<u>Qual</u>	<u>Unit</u>
Aluminum	46000	200	20		ug/L
Antimony	<100	100	5		ug/L
Arsenic	<10	10	0.5		ug/L
Barium	<100	100	2.0		ug/L
Beryllium	<5	5	0.1		ug/L
Boron	2410	250	5.0		ug/L
Cadmium	<10	10	0.3		ug/L
Calcium	3.29	0.4	0.04		mg/L
Chromium	1940	10	0.3		ug/L
Cobalt	<1Q	10	0.5		ug/L
Copper	248	10	0.5		ug/L
Iron	5330	200	10.0		ug/L
Lead	230	10	0.1		ug/L
Magnesium	<1	1	0.1		mg/L
Manganese	51.4	10	0.2		ug/L
Nickel	270	25	0.5		ug/L
Potassium	14.7	10	0.05		mg/L
Selenium	<20	20	0.5		ug/L
Silver	<50	50	1.0		ug/L
Sodium	466	0.4	0.02		mg/L
Thallium	<25	25	0.05		ug/L
Vanadium	<25	25	1.0		ug/L
Zinc	197	30	2.0		ug/L

Dilution Factor

10

Analyzed By

Joe Semberski

Analysis Date/Time

Apr 13 2012 11:19AM

Prep By

Prep Date/Time

A-2c

Analytical Quality Control Results Report

Batch: 12041603	ICP Metals - water (total)
Everette Plating # 1	LIMS ID: 2012-1032

ICP Metals - water (Total) DUP					Run: 1
Parameter	Result	DL	RL	Accuracy Control	Precision Control
Aluminum	8200 ug/L	200	200		
Aluminum (RPD)	0.2 %				0 - 20
Antimony (RPD)	17.6 %				0 - 20
Antimony	<100 ug/L	50	100		
Arsenic	<10 ug/L	5	10		
Arsenic (RPD)	73.7 %				0 - 20
Barium (RPD)	4.6 %				0 - 20
Barium	<100 ug/L	20	100		
Beryllium	<5 ug/L	1	5		
Beryllium (RPD)	254 %				0 - 20
Boron (RPD)	3.8 %				0 - 20
Boron	3370 ug/L	50	250		
Cadmium	<10 ug/L	3	10		
Cadmium (RPD)	0 %				0 - 20
Calcium (RPD)	10.6 %				0 - 20
Calcium	2.20 mg/L	0.4	0.4		
Chromium	357 ug/L	3	10		
Chromium (RPD)	1.1 %				0 - 20
Cobalt (RPD)	40.0 %				0 - 20
Cobalt	<10 ug/L	5	10		
Copper	69.1 ug/L	5	10		
Copper (RPD)	1.7 %				0 - 20
Iron (RPD)	1.0 %				0 - 20
Iron	573 ug/L	100	200		
Lead	42.2 ug/L	1	10		
Lead (RPD)	0.3 %				0 - 20
Magnesium (RPD)	57.1 %				0 - 20
Magnesium	<1 mg/L	1	1		
Manganese	26 ug/L	2	10		
Manganese (RPD)	4.1 %				0 - 20
Nickel (RPD)	2.0 %				0 - 20
Nickel	120 ug/L	5	25		
Potassium	<10 mg/L	0.5	10		
Potassium (RPD)	5.2 %				0 - 20
Selenium (RPD)	1700 %				0 - 20
Selenium	<20 ug/L	5	20		

A-2d