

ADEQ

ARKANSAS
Department of Environmental Quality

March 16, 2009

Gerry Eddy
Safety and Health Manager
SAPA Extrusions
P.O. Box 40
Magnolia, AR 71753

NPDES PERMIT FILE
NPDES # AR0043613
AFIN # 14-00167
Permit PN
Correspondence
Technical Backup
3/18/09 Date Scanned

Re: SAPA (Tracking # ARP000004, AFIN #1400167) Pretreatment Compliance Assurance Visit in Magnolia, AR (NPDES #AR0043613)

Dear Mr. Eddy,

On 12/2/08 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)].

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 "open the books" and share process knowledge compliments the true spirit of environmental partnerships.

SUMMARY

SAPA appears to be well within the calculated Maximum Daily & Average Monthly limits for both mass (loading) and indicated concentration limits.

The site visit observations, sampling analysis and subsequent information gathered indicated SAPA is compliant with the pretreatment standards for existing sources in 40 CFR 467.35, Subpart C.

The most representative sampling point should be cut in the steel grated parshall flume cover below the flume. Capturing samples upstream in the small concrete sump could produce erroneous analytical results.

It is recommended SAPA approach the City of Magnolia to update/revise Alcoa's "Authorization to Discharge" (see Attachment A-1). It expired March 29, 2000.

Find attached various supporting documentation: the "Pretreatment Industrial Inspection", schematics and ADEQ's "Certificate of Analysis" (2) with its Chain of Custody.

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,

A handwritten signature in cursive script that reads "Allen R. Gilliam".

Allen R. Gilliam

ADEQ State Pretreatment Coordinator

cc: Cindy Garner, NPDES Enforcement Branch Manager
Russell Thomas, Magnolia Wastewater System Superintendent, P.O. Box 666, Magnolia,
AR 71753
Rudy Molina, EPA 6WQ-PP

Attachments

Pretreatment Industrial Inspection

Facility Information

Facility Name: SAPA Extrusions, Inc.		Site Address: 1617 North Washington	
Plant #2 (Plant #1 idled)		Magnolia, AR 71753	
Signatory Authority (Name & Title): Kevin Stuban / General Manager			
Phone: 870.235.2692		Mailing Address (if different): P.O. Box 40	
Fax: 870.235.2659			
Address: same		Corporate Owner Name and address (if applicable):	
Contact Person (Name & Title): Gerry Eddy			
		Phone:	
Phone: same		Fax:	
Fax: same		Corporate CEO:	
e-mail: gerry.eddy@sapagroup.com		e-mail:	
Facility Tracking #ARP000004 AFIN# 1400167		Last Inspection Date: 6/21/06	
POTW (City) IU discharges to: Magnolia		POTW's NPDES #AR0043613	
Industrial Classification:	<input checked="" type="checkbox"/> Categorical	<input type="checkbox"/> Significant	
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 467.35 (Subpart C) PSES			
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B. Inspection Analysis			
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A. General Information			
B. Facility Permits			
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 6 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 7, 8 of 8	
Comments :			
Inspector's Name (Print): Allen Gilliam		Signature: 	
IU Rep's Name (Print): Gerry Eddy		Signature: 	
Date and Time Inspection Ended: 12/2/08 @ 9:40 Am			

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 (CAV) with sampling to independently verify IU's info being submitted to ADEQ semi-annually coincides with what is observed according to 40 CFR 403.8(f)(1)(v)

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

<input checked="" type="checkbox"/> Pre-inspection Meeting	<input checked="" type="checkbox"/> (City) Permit Conditions*	<input checked="" type="checkbox"/> Safety Concerns
<input checked="" type="checkbox"/> Process Inspection	<input checked="" type="checkbox"/> Pretreatment Process	<input type="checkbox"/> TOMP N/A
<input checked="" type="checkbox"/> Chemical Storage	<input checked="" type="checkbox"/> Discharge point(s)	<input checked="" type="checkbox"/> Spills/Slug Control Plan
<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 checked="" type="checkbox"/> Calibration Records
<input type="checkbox"/> MSDS Inventory List	<input type="checkbox"/> New MSDS	<input type="checkbox"/>

Comments: The facility is a conditionally exempt small quantity haz waste generator. In this office's opinion, they should contact the City for a new permit since the last one expired in 2000. Their air scrubber still runs continually because of their air permit constraints and to keep the corrosive mist from the "bright dip" (acid) tank from corroding other metal in the building.

*See Attachment A-1 for the old City permit to this facility. It is expired, needs to be reissued and modified.

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: This inspector viewed the IU rep's monthly calculations (spreadsheets) of his CFR 467 production based limits. All numbers looked in order from the various operations (lbs extruded, cleaned, etched, rinsed and bright dipped) reporting via their intra-net, the spreadsheet calculations appeared in order with guidance previously provided by this office.

Process Area(s): No substantial changes had been made since the last CAV in 12/05. See Attachment A-2 for the generic plant process layout. Production has decreased, however. Solid aluminum billets are heated to around 800°F and pressed through one of the two (2) 7" extrusion presses (they used to have to use three [3]) that are in operation at this time. Very little leakage was observed. Hydraulic leaks/non-contact cooling water from this operation is contained below the equipment in concrete sumps. These are pumped, as necessary, to an outside oil/water separator system. Oil is hauled off-site while the remaining wastewater is pumped to their pretreatment system.

Most products are shower/bath stall frames but some stadium seating is still extruded. Extrusions are air cooled by huge fans on "draw-out" tables with heat treatment tanks seldom used. Workpieces are straightened and cut to desired lengths then sent through a heat treatment over for about 6 to 8 hrs at 450°F.

A small % of their extrusions are sent out as "mill finished" (no cleaning/etching/anodizing/colored/painted, etc). A portion of pre-extruded products are brought in for final "finishing". Final finishing consists of a combination of tanks with the cleaning/etching/de-smut/bright dip, etc. mentioned above with their rinses. Then, depending on customer specs, some workpieces go through anodizing or color dyeing.

Paint line consists a spray cleaner (caustic) followed by two rinses and then an anchor seal (fluotitanic [sic?] acid) in preparation for the powder paint application followed by a bake oven.

Pollution prevention (P2) practices include utilizing De-1 (city water has too much Zn and TDS in it) water for make-up on their anodizing line, countercurrent rinses, baths' air agitation/filtration, water conservation via flow meters/restrictors and phosphoric acid regeneration/demineralization for re-use.

The dies are periodically cleaned in a hot caustic (NaOH) bath. Safety features have been added to the make-up water for this process so it can not overflow. Any supernatant is sent to pretreatment to aid in pH adjustment as necessary.

Remaining operations (fabrication mainly) create no wastewater.

Pretreatment System: Equipment appeared well maintained and operational. Hex Chrome is reduced to tri- using sodium bi-sulfate & sulfur dioxide. All wastewater is pumped to an equalization basin where it is pH adjusted with either sodium hydroxide or sulfuric acid, then sent to a clarifier where polymers are added for typical chemical precipitation. Treated w.w. is pumped to the City. Sludge from is sent through a press with pressed-out w.w. sent back to equalization. Filter pressed sludge is sent off-site for proper disposal.

Self Monitoring Procedures: A ~6' length of PVC tubing with a PVC container "strapped" at the bottom is used for the metals' sampling. The same tube is used to strap the glass O&G sample bottle.

Diversion/Sewer Meters: N/A

Spill/Slug Control Plan: Facility does have a written "operations manual" that addresses spills and containment. From the brief observations conducted by this inspector, potential for a slug load to the City is minimal. Chemical storage is well bermed with containment well maintained.

Sampling Point: The metal grating covering the flow weir (just SW of their pretreatment building) should have its sampling "point" cut below the weir (~3' below ground level) for the most representative sampling for all regulated parameters. Flow is continuously monitored. The meter was last calibrated/documented on 10/08. This inspector's grab samples, determined to be "representative", were taken at 11:25 a.m. and then at 3:55 p.m. IU rep. took samples simultaneously. These samples were collected "above" the weir in a small concrete sump as it overflowed the weir.

Chemical Storage: See above. "Station" storage areas were well protected with iron posts and surrounding chain. Bulk storage appeared to have sufficient containment capacity.

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 12/02/08 @ 9:40 a.m.		SIC code(s): 3354	
IU Reps/Titles:		Control Authority Reps/Titles	
Gerry Eddy/Env. Safety & Health Manager		Allen Gilliam/ADEQ State Pretreatment Coordinator	
End product(s): Extruded aluminum shower frames and some stadium seating. Some sent out simply as "mill finished".		Approx. # of units produced: Not determined	
Days of Operation: Monday thru Thursday		Days of Production (if different): Same	
Hours of Operation: 10 hr days		Hours of Production (if different): Same	
Shift 1, hrs.: 5 a.m. to 4 p.m.	Shift 2, hrs.: N/A to	Shift 3, hrs.: N/A to	
# of Employees: ~245 (down from ~550 three years ago)		Peak Mos.: N/A	"Off" Mos.: N/A
Are there any scheduled plant shutdowns? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If yes, when? Christmas			
Are there designated plant clean-up days? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If yes, when?			
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
If No, explain: <i>Sampling "point" needs a modification.</i>			
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
If Yes, explain:			
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: Hard hat, ear & eye protection and steel toed footwear is required if inside the actual processing building. Pedestrian traffic-way lines and "gates" are set up for the safest route through the facility. Other areas to be aware of are the caustic and acid process baths. Some areas where leakage was apparent might cause slippage.			
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 dropped significantly since the last visit. IU rep's monthly spreadsheet calculations take this and flows into account.			
Raw materials? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Flow rates? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: See above discussion about "Production..."			
Are regulated and non-regulated wastestreams combined? yes <input checked="" type="checkbox"/> no <input type="checkbox"/>			

Prior to Pretreatment System?	yes <input checked="" type="checkbox"/>	no <input 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 type="checkbox"/>	N/A <input checked="" type="checkbox"/>
At connection to sanitary sewer?	yes <input type="checkbox"/>	no <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Production and flows verified for Production-Based Standards?	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	N/A <input type="checkbox"/>
What is the current avg. production rate and process flow? ~600 lbs extruded/day @ ~37,000 gpd			
Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? Yes* <input checked="" type="checkbox"/> no <input type="checkbox"/>			
*See discussion above regarding calculations done monthly to take into account the reduced production.			

B. Facility Permits		
Permit Type	Permit/ID #	Expiration Date
Air	0576-AOP-R4	June 30, 2009
RCRA	ARR000007542	N/A
NPDES		
Other (Stormwater)	ARR00A892	3/09
C. Additional Comments		
(Note which section or attachment comments are regarding): None		

Attachment A: Industrial Process(es)			
List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not			
1. Core	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Clean/Etch Bath	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Extrusion Press Leakage	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Clean/Etch Rinse	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3. Press Ht. Treat. Contact Cooling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	6. Clean/Etch Scrubber Liquor	Yes <input checked="" 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 "Process Area(s)"			
General observations of facility's indoor housekeeping: Appeared clean with an area or two with apparent leakage			
General observations of area outside facility's building: Well kept, clean and organized.			
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 Not addressed (NA), only total flow was measured/necessary	<input checked="" type="checkbox"/> Equip. Cleanup NA	<input type="checkbox"/> Floor Cleanup	<input checked="" type="checkbox"/> Spent Bath Solutions NA
<input type="checkbox"/> Product Cleaning	<input type="checkbox"/> Forklifts Maint./Wash	<input checked="" type="checkbox"/> Tank Dragout NA	<input checked="" type="checkbox"/> Air Pollution Devices NA
<input type="checkbox"/> Boiler Blowdown	<input checked="" type="checkbox"/> Spent Rinse Tanks NA	<input checked="" type="checkbox"/> Equipment Coolants NA	<input checked="" type="checkbox"/> Non-Contact Cooling Water NA
<input type="checkbox"/> Stormwater	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
List Major Raw Materials and Chemicals used: Time constraints didn't allow for a comprehensive review of the facility's notebook full of MSDS. But, they were readily available.			
Check Waste Stream Pollutants of Concern from Process(es)			

<input type="checkbox"/> BOD	<input checked="" type="checkbox"/> CN ⁻	<input checked="" type="checkbox"/> Metals (List): Cr and Zn	<input type="checkbox"/> Solvents (List)
<input type="checkbox"/> TSS	<input type="checkbox"/> Cl ₂	<input checked="" type="checkbox"/> City's parameters (see Attach. A-1)	<input checked="" type="checkbox"/> pH
<input checked="" type="checkbox"/> O&G	<input type="checkbox"/> S ⁻		
Are there floor drains in the Process area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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 <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Does this facility practice P2? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Environmental Management System in place? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not a certified one but, a company-wide "compliance manual	
ISO Certified? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Written Standard Operating Procedures? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Preventative Maintenance Program Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (hydraulic systems, valves, pumps, etc)	
Explain: Typical preventative maintenance	
Water Reuse: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Discussed in "Process Area" above	
Cost Accounting to Track Savings: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Inventory Control / "Green Purchasing": Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (lean manufacturing/"env. friendly purchasing", etc)	
Explain:	
Employee Training: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Done by an outside consulting firm	
Spent Solvent Reclamation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Explain:	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Cardboard and wood	
Recycle Waste Oil, Solvents, and Lubricants? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Used oil sent off-site to a recycler	
Other Activities	
P2 Equipment/Practices in use:	
<input type="checkbox"/> Overflow Alarms	<input checked="" type="checkbox"/> Aqueous Cleaning Solutions
<input type="checkbox"/> Fog Spray Rinsing	<input checked="" type="checkbox"/> Countercurrent Rinsing
<input checked="" 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 type="checkbox"/> Aqueous Paint Stripping Solutions	<input type="checkbox"/> Bead Blasting to Remove Paint
<input checked="" type="checkbox"/> Water Soluble Cutting Fluids	<input type="checkbox"/> Recycle Overspray

<input checked="" type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input type="checkbox"/> Conductivity Meters
<input checked="" type="checkbox"/> Demineralizing/regeneration of Phos./Sulfuric acid baths	<input checked="" type="checkbox"/> Bath / Rinse Filtration

Attachment C: Pretreatment System

Was the pretreatment system visually inspected during this visit? Yes No N/A

*Oily wastes separated and sent to separate storage tank.

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

<input type="checkbox"/> Dissolved air floatation	<input type="checkbox"/> Membrane Tech.	<input type="checkbox"/> Ion Exchange	<input type="checkbox"/> Biological Treatment
<input type="checkbox"/> Centrifugation	<input checked="" type="checkbox"/> Flow Equalization	<input type="checkbox"/> Ozonation	<input type="checkbox"/> Chlorinating
<input checked="" type="checkbox"/> Chemical Precipitation	<input checked="" type="checkbox"/> Oil/Water Separation	<input type="checkbox"/> Reverse Osmosis	<input type="checkbox"/> Grit Removal
<input checked="" 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 checked="" type="checkbox"/> Sedimentation	<input type="checkbox"/> Silver Recovery
<input type="checkbox"/> Belt/Disk Oil Skimmer	<input checked="" type="checkbox"/> Demineralizer	<input type="checkbox"/>	<input type="checkbox"/>

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order): Pretreatment is in a separate building from the main process area. See above section "Pretreatment System" for general description.

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

System Operator(s) Name: Stevan Bailey - Class III & Paul Massey - Class II

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

Is the System Operator(s) licensed by the State of Arkansas Yes No N/A

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

If Yes, list type and frequency: Annually by an outside consultant.

Is the discharge from the Pretreatment System? Batch Continuous Combination (some internal batch)

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

Volume of each batch: internally, as mentioned and the volumes were not discussed (just as needed for pretreatment).

Describe process from which batch originated (spent bath, e.g.): spent anodizing, cleaning, etching & die cleaning ops.

Approximate duration of batch discharge: not discussed

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading) during this CAV
Milltronics	Certified outside firm annually (10/08)	63.2 gpm @ 11:25 a.m. & 61.3 gpm @ 3:55 p.m.

Attachment D: Chemical Storage Area(s)

Does the facility have a designated chemical storage area(s)? Yes No

Was this area(s) visually inspected? Yes No N/A

Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. Caustic and sulfuric acid	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
2. Phosphoric and nitric acid (pumped)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
3. Gasoline (secondary containment)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input checked="" type="checkbox"/> Storm Sewer

Does the Chemical Storage Area(s) contain any of the following?

<input checked="" type="checkbox"/> Dikes, Berms for Containment	<input type="checkbox"/> Plugs for Floor Drains
<input type="checkbox"/> Secondary Tanks for Holding	<input type="checkbox"/> Premix (low) Concentrations

<input checked="" type="checkbox"/> Alarms (High & low level)	<input checked="" type="checkbox"/> Chain restraints, limited access
<input checked="" type="checkbox"/> Spills Control Kits for Cleanup	<input checked="" type="checkbox"/> Notification Procedures
<input type="checkbox"/> Chemical desegregation within Storage Area	<input type="checkbox"/> Other
Chemical Inventory List (MSDS) on file?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Were any new MSDS reviewed during the Inspection?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If yes, list below:	
Chemical storage comments: Appeared adequate with low potential for a slug discharge to the City	
Chemical handling procedures (totes, dolly, buckets, hardline, etc): totes, forklifts, barrel dolleys, hardline	

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan? Written spill/somewhat slug related plan last rev. 2/08	<input checked="" type="checkbox"/> yes <input 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 checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(A) Describes discharge practices including non routine batch (slug) discharges	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> N/A
(B) Describes storage and handling of chemicals	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(C) Procedures for immediate notification to POTW of slug discharges	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
2. Describes procedures and equipment for emergency response	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
3. Describes follow-up to limit damage suffered by POTW or environment	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input 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:	
Does the facility have Spill/Slug Notification Procedures posted? Not observed	<input type="checkbox"/> yes <input type="checkbox"/> no
Is it posted in areas where chemicals are used and stored? Not observed	<input type="checkbox"/> yes <input type="checkbox"/> no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
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	

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.		
Where is the sample point located? Outside and ~100' SW of the Pretreatment building.		
<input type="checkbox"/> End of Process	<input checked="" type="checkbox"/> Pretreatment Effluent Parshall flume with <input checked="" type="checkbox"/> Metered Flow	<input checked="" type="checkbox"/> Total Flow
<input type="checkbox"/> Combined Flow	<input type="checkbox"/> Utility Manhole	<input type="checkbox"/> Flow Actuator
<input type="checkbox"/> Private Manhole	<input type="checkbox"/> Safety Hazards Identified	<input type="checkbox"/> Advance Notice Required
<input type="checkbox"/> Safety Hazards Identified	<input type="checkbox"/>	<input type="checkbox"/>

Is the Sample Collection Site Adequate? Actual sampling "hole" needs to be "below" the Parshall flume	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Did the facility rep. request a split sample on this sampling/inspection?	<input checked="" type="checkbox"/> Yes <input 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: American Interplex	
Automatic Sampler <input type="checkbox"/> Manual <input type="checkbox"/> Both <input checked="" type="checkbox"/> for grabs and 24 hr composites	
IU Self-Monitoring Results reviewed:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	<input checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	<input checked="" type="checkbox"/> Yes <input 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: Weekly (by the City' IU permit)	
<input type="checkbox"/> Al(t) (City's permit)	<input checked="" type="checkbox"/> Cr(t)
<input checked="" type="checkbox"/> Zn(t)	<input checked="" type="checkbox"/> pH
	<input checked="" type="checkbox"/> Pb(t) (City's permit)
	<input checked="" type="checkbox"/> CN(t)
	<input type="checkbox"/> TTO (City's IU permit)

Attachment A-1

Handed to me by G.I.
12/2/08

CITY OF MAGNOLIA WASTEWATER SYSTEM
WASTEWATER DISCHARGE PERMIT

PERMIT # MAG.AR-01 & 01A

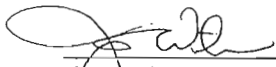
In accordance with the provisions of the City of Magnolia, Arkansas City Ordinance #94-5 - 95-12 the following facility, ALCOA P.O. BOX 40 MAGNOLIA , ARKANSAS 71753 is hereby authorized to discharge wastewater as described in the wastewater contribution application dated February 15, 1999 through outfalls # 001 and #002, identified in this permit in accordance with the conditions set forth in the permit.

Compliance with this permit does not relieve the Permittee of its obligation to comply fully with the conditions, limitations, requirements , standards, or requirements as required by Federal, State, and Local Laws. This permit may be amended based upon new requirements or regulations issued by regulatory authorities.

The Permittee is required to comply fully with the conditions, limitations, requirements, and terms as indicated by this permit, local ordinance, or other requirements required by the City of Magnolia may issue. Noncompliance with any term or condition of this permit shall constitute a violation of the City of Magnolia, Arkansas Sewer Use Ordinance. The City Of Magnolia may revoke, suspend, or terminate this permit for the refusal to comply with the conditions or requirements stated herein.

This permit shall become effective on March 29, 1999, and expire on March 29, 2000. At least ninety (90) days prior to the expiration of this permit, the Permittee must submit an application to the City Of Magnolia for renewal. The Permittee is not authorized to discharge at anytime without the permit being current, as required by the City Of Magnolia.

Issued this 29th day March of 1999



Jim Wilson, Superintendent
Magnolia Wastewater System

LEGAL AUTHORITY

The City of Magnolia shall operate pursuant to legal authority enforceable in Federal, State, or Local courts which authorizes or enables the City of Magnolia Wastewater Department to apply and to enforce the requirements of section 307 (b), (c), and 402 (b) (8) of the Act and any regulations implementing those sections. Such authority maybe contained in a statute, ordinance, or series of contracts or joint powers agreement which the City of Magnolia is authorized to enact, enter into or implement, and which are authorized by State Law. At a minimum , this legal authority shall enable the City of Magnolia to implement the program in accordance with 40 CFR 403.8 (f) (1) .

POLLUTANT LIMITATIONS AND MONITORING REQUIREMENTS

During the period of the effective date of this permit through the date of expiration, the Permittee is authorized to discharge wastewater as described inthe wastewater contribution application dated February 15, 1999 into the City of Magnolia Wastewater System for the outfall locations Alcoa # 001 & 002

PERMIT PARAMETERS FOR OUT FALL # 001

During the permit period, the Permittee shall not exceed the following effluent limitations listed below:

PARAMETER	DAILY MAXIMUM LIMITS	Monthly Average	UNITS	MONITORING FREQUENCY	SAMPLE TYPE
Total Chromium	0.42	0.17	LBS/DY	1 WEEKLY	24 HR. COMP
Cyanide	0.28	0.12	LBS/DY	1 WEEKLY	GRAB
Zinc	1.70	0.85	LBS/DY	1 WEEKLY	24 HR. COMP
Oil / Grease	25	15	LBS/DY	1 WEEKLY	GRAB
Lead	MONITOR			1 WEEKLY	24 HR. COMP
BOD	250	N/A	MG/L	1 WEEKLY	24 HR. COMP
TSS	250	N/A	MG/L	1 WEEKLY	24 HR. COMP
Aluminum	MONITOR			1 WEEKLY	24 HR. COMP
TTO	0.64			1 YEAR	24 HR. COMP
pH	6.0-9.0		S.U.	1 WEEKLY	GRAB
FLOW	500,000		GPD	DAILY	INSTANTANEOUS

Notice:

Semi-volatiles shall be taken by 24 hour composite samples, however, volatiles shall be taken by grab samples and preserved according to 40 CFR 136

All samples collected shall be preserved and analyzed in accordance with 40 CFR 136 and amendments there unless otherwise specified in the permit.

The Permittee is required to notify the City of Magnolia of any additional flow amounts exceeding 10 % of the flow requirement listed in this permit

The City of Magnolia may also require that the Permittee meet biomointoring requirements and to pass toxicity test as performed by an acceptable testing protocol (Microtox). The City of Magnolia may set a specific dilution level to comply with the conditions of the permit in disposing of Wastewater to the City of Magnolia.

A-1b

PERMIT PARAMETERS FOR OUT FALL # 002

During the permit period, the Permittee shall not exceed the following effluent limitations listed below:

PARAMETER	DAILY MAXIMUM LIMITS	Monthly Average	UNITS	MONITORING FREQUENCY	SAMPLE TYPE
Total Chromium	0.42	0.17	LBS/DY	1 WEEKLY	24 HR. COMP
Cyanide	0.28	0.12	LBS/DY	1 WEEKLY	GRAB
Zinc	1.70	0.85	LBS/DY	1 WEEKLY	24 HR. COMP
Oil / Grease	25	15	LBS/DY	1 WEEKLY	GRAB
Lead	MONITOR			1 WEEKLY	24 HR. COMP
BOD	250	N/A	MG/L	1 WEEKLY	24 HR. COMP
TSS	250	N/A	MG/L	1 WEEKLY	24 HR. COMP
Aluminum	MONITOR			1 WEEKLY	24 HR. COMP
TTO	0.64			1 YEAR	24 HR. COMP
pH	6.0-9.0		S.U.	1 WEEKLY	GRAB
FLOW	500,000		GPD	DAILY	INSTANTANEOUS

Notice:

Semi-volatiles shall be taken by 24 hour composite samples, however, volatiles shall be taken by grab samples and preserved according to 40 CFR 136

All samples collected shall be preserved and analyzed in accordance with 40 CFR 136 and amendments there unless otherwise specified in the permit.

The Permittee is required to notify the City of Magnolia of any additional flow amounts exceeding 10 % of the flow requirement listed in this permit

The City of Magnolia may also require that the Permittee meet biomointoring requirements and to pass toxicity test as performed by an acceptable testing protocol (Microtox). The City of Magnolia may set a specific dilution level to comply with the conditions of the permit in disposing of Wastewater to the City of Magnolia.

MONITORING LOCATION

During the period beginning on the effective date of this permit and lasting until the date of expiration, the Permittee is authorized to discharge from location number Alcoa # 001 & 002 into the City of Magnolia Wastewater System. The Permittee is only permitted to discharge wastewater as described in wastewater contribution application dated February 15, 1999 from this location.

INCREASE IN MONITORING FREQUENCIES

If the Permittee monitors any pollutant more frequently than required by the permit, using test procedures prescribed in 40 CFR 136 or amendments thereto, or otherwise approved by the EPA or as specified in this permit, the results shall be reported in the monthly report submitted to Permittee. Such monitoring frequency shall be indicated in the monthly report.

NOTIFICATION AND RESAMPLING

If the results of the Permittee wastewater analysis indicates a violation (s) of this permit, the Permittee shall inform the City of the Magnolia immediately upon becoming aware of the violation (s) and shall repeat the sampling and analysis for the pollutants in violation and must submit the results to the City of Magnolia within five (5) working days of the first violation.

SPECIFIC PROHIBITIONS

No user shall introduce or cause to be introduced into the wastewater system the following pollutants, substances, or wastewater:

- (1) Pollutants which create a fire or explosive hazard in the wastewater system, including, but not limited to, waste streams with a close-cup flash points of less than 140 degrees Fahrenheit (60 degrees Celsius) using the test methods specified in CFR 261.21;
- (2) Wastewater having a pH less than 6.0 or more than 10.0 standard units (s.u) or otherwise causing corrosive structural damage to the wastewater system or equipment;
- (3) Any solid or viscous substances in the amount which will cause obstruction of the flow throughout the wastewater system resulting in interference;
- (4) Pollutants, including oxygen-demanding pollutants (BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference within the wastewater system;
- (5) Wastewater having a temperature greater than 140 degrees Fahrenheit or 40 degrees Celsius entering the treatment plant, or which will inhibit biological activity in the wastewater treatment plant resulting in interference;
- (6) Petroleum oils, nonbiodegradable cutting oil or products of mineral oil origin, in amounts that will cause interference or pass through;

SPECIFIC PROHIBITIONS (continued)

- (7) .Pollutants which result in the presence of toxic gases, quantity that may cause acute worker health and safety problems;
- (8) Any trucked or hauled waste, except at discharge points designated by the Superintendent.
- (9) 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 or a hazard to life, or to prevent entry into the sewers for maintenance or repair;
- (10) Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solution, which consequently imparts color to the treatment plant's effluent, thereby violating the City of Magnolia's NPDES permit;
- (11) Wastewater containing any radioactive wastes or isotopes except in compliance with applicable State or Federal regulations;
- (12) Sludges, screenings, or other residues from the pretreatment or industrial wastes;
- (13) Medical wastes, except as specifically authorized by the Superintendent in a wastewater discharge permit;
- (14) Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail toxicity test;
- (15) Detergents, surface-active agents, or other substances which may cause excessive foaming at the wastewater treatment plant;
- (16) Wastewater causing two (2) reading on an explosion hazard meter at any point of discharge into the wastewater system.

ADDITIONAL PRETREATMENT REQUIREMENTS:

Whenever deemed necessary, the Superintendent may require users to restrict their discharge during peak flow period, designate that certain wastewater be discharge only into specific sewers, relocate and/or consolidate point of discharge, separate sewage wastestreams from industrial wastestreams, and such other conditions as may be necessary to protect the wastewater plant and determine the user's compliance with the requirements of this ordinance.

(B) The Superintendent may require any person discharging into the wastewater system to install and maintain, on their property and at their expense, a suitable storage and flow control facility to ensure equalization of flow. A wastewater discharge permit may be issued solely for flow equalization.

(C) Grease, oil, and sand interceptors shall be provided when they are necessary the proper handling of wastewater containing excessive amounts of grease and oil, or sand; except that such interceptors shall not be required for residential users. All interception units shall be of the type and capacity approved by the Superintendent and shall Be so located to be easily accessible for cleaning inspection. Such interceptors shall be inspected, cleaned, and repaired regularly, as needed, by the user at their expense.

(D) Users with the potential to discharge flammable substance may be required to install and maintain an approved combustible gas detection meter.

(E) Users may be required at the discretion of the Superintendent to install flow meters and sampling equipment for routine monitoring of wastewater.

REPORTING REQUIREMENTS

The Permittee is to report monitoring results obtained from the effluent discharge to the City of Magnolia at least once per month. Reporting periods shall begin on the first day of the month and shall end on the last day of the month. The Permittee shall prepare regular monthly reports and shall submit these reports no later than the 15th of the month following each reporting period. The reports shall include the nature and concentration of all pollutants in the effluent from which sampling and analysis were performed during the calendar month proceeding the submission of each report.

All monitoring reports submitted to the City of Magnolia shall contain the following information:

- (1) The results of analysis for pollutants and values specified in this permit and a copy of the laboratory report sheets;
- (2) The date and time of sampling, sampling methods used and who collected the sample (s);
- (3) The date and time of analysis and who performed the analysis;
- (4) The analytical techniques/method used;
- (5) The chain of custody records and any field monitoring reports regarding the collection and transport of samples;
- (6) The daily average, maximum, and total flow for the regulated process for the calendar month;
- (7) The minimum and maximum pH during the calendar month;
- (8) A complete monitoring summary signed by the facility's authorized representative;
- (9) A signed TTO signatory statement (where applicable); and
- (10) A copy of the effluent flow monitoring an pH log sheet (where applicable)

REPORTING REQUIREMENTS (CONTINUED)

- (A) The Permittee is required to notify the City of Magnolia in writing of any discharge into the wastewater system of a substance which is otherwise disposed of would be hazardous waste under 40 CFR Part 261.
- (B) The Permittee is required to submit any additional reports, records, or data pertaining to pretreatment requirements to the City of Magnolia within the time specified for such submission.
- (C) All reports (including written and oral notification) required by the permit be submitted to the following address:

Superintendent
City of Magnolia
P.O. Box 666
Magnolia, AR 71754-0666

Phone - (870) 234-2454
Fax - (870) 234-2203

- (D) All Reports are to be signed by the duly authorized representative designated by the Permittee, provided the representative is responsible for the facility from which the discharge originates.
- (E) The Permittee is also required to comply with the conditions established in the local ordinances while discharging waste into the City of Magnolia Wastewater System
- (F) The Permittee shall furnish the City of Magnolia, within specified time, all information which the City of Magnolia request to determine whether cause exists for modifying, revoking, reissuing or termination this permit , or to determine compliance with this permit. The Permittee shall also, upon request and within the specified time, provide the City of Magnolia copies of any records required by this permit.

COMPLIANCE SCHEDULE

If the Permittee is to comply with a Compliance Schedule, it must submit a detailed description of the activities involved, indicating the days required to complete the activity, submit drawing and a schematic of any equipment installation. No later than fourteen (14) days following each date in the Compliance Schedule, the Permittee shall submit to the City of Magnolia a report including , at a minimum, whether or not it complied with the increment of progress to be met on such date and if not, the date of which it expects to comply with the increment of progress, and the reason for delay in steps being taken to return the project to the time submitted in the original schedule.

ACCIDENTAL DISCHARGE

The Permittee shall notify the City of Magnolia immediately upon the occurrence of an accidental discharge of any prohibited substances, slug loads, or spills that may enter the sanitary sewer system. the notification shall include location of the discharge, date and time the discharge occurred, the type of waste (including concentration and volume), and all corrective actions taken. The Permittee notification of accidental release of waste shall not relieve it of other reporting requirement that arise under Federal, State, and Local laws.

Within five (5) days following an accidental discharge, the Permittee shall submit to the City of Magnolia a detailed written report. This report shall contain the following information:

- (1) A description and cause of the upset, slug load or accidental discharge, and the impact on the Permittee compliance status, Location of the discharge and the type, the concentration and volume of waste;
- (2) The duration of noncompliance, including exact dates and time of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonable expected to occur; and
- (3) All steps taken or to be taken to reduce, eliminate and / or prevent recurrence of such upset, slug load, accidental discharge or condition of noncompliance.

NEW WASTEWATER CONSTITUENTS

The Permittee shall notify the City of Magnolia prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the wastewater being introduced into the wastewater system from the Permittee facility. the Permittee shall give notice to the City of Magnolia within ninety (90) days in advance of the facility expansion, production increase or process modification, which may result in a new or substantial increased discharge or a change in the nature of the discharge. This shall include any changes that may affect the volume or character of pollutants in the wastewater discharge.

BYPASS

The Permittee must provide immediate notice to the City of Magnolia upon becoming aware of an unanticipated bypass at the discharge location.

SIGNATURE REQUIREMENTS

All applications, reports, or information submitted to the City of Magnolia must contain the following certification statement and be signed by an authorized representative of the Permittee:

“ I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquire of the person or person who manage the system or those person(s) directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for know violation.”

SEVERABILITY

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

DUTY TO COMPLY

The Permittee shall comply with all conditions of this permit. Failure to comply with the requirements of this permit may warrant enforcement proceeding including fines, criminal and civil penalties, revocation of permit and / or termination of water and /or sewer service.

COMPLIANCE WITH APPLICABLE PRETREATMENT STANDARDS

Compliance with the permit does not relieve the Permittee from its obligation regarding compliance with any and all applicable Local, State and Federal Pretreatment Standards and Requirements including any such standards or requirements that may become effective during the term of this permit,

Categorical Pretreatment Standards

The categorical pretreatment standards found in 40 CFR 405-471 are hereby incorporated.

(A) Where a categorical pretreatment is expressed only in terms of either the mass or the concentration of a pollutant in wastewater, the superintendent may impose equivalent concentration or mass limits in accordance with 40 CFR 403.6 (c).

(B) When wastewater subject to a categorical pretreatment standard is mixed with wastewater not regulated by the same standard, the Superintendent shall impose an alternative limit using the combined wastestream formula in 40 CFR 403.6 (c).

(C) A user may obtain a variance from the categorical pretreatment standard if the user can prove, pursuant to the procedural and substantive provision in 40 CFR 403.13, that factors relating to its discharge are fundamentally different from the factors considered by EPA when developing the categorical pretreatment standard.

(D) A user may obtain a net gross adjustment to a categorical standard in accordance with 40 CFR 403.15, as approved by the Superintendent.

PRODUCTION - BASED STANDARDS

Any Permittee who is subject to the production-based standards, shall report the applicable production data along with each periodic report. This data shall be reported in the units of measurements by which the mass of pollutants is regulated.

PROHIBITION OF DILUTION

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

DUTY TO MITIGATE

The Permittee shall take all reasonable steps to minimize or correct any adverse impact to the Publicly Owned Treatment Works (POTW), or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

PROPERTY RIGHTS

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

PERMIT MODIFICATION

Modifications to this permit may be made at anytime as deemed necessary by the City of Magnolia. This permit may be modified for good cause, including, but not limited to, the following reasons:

- (1) To incorporate any new or revised Federal, State or Local pretreatment standards or requirements;
- (2) Any material or substantial alteration or addition to the Permittee operation process or discharge volume or character which were not considered in drafting the effective permit;
- (3) A change in any condition in either the Permittee or the POTW that requires either temporary or permanent reduction or elimination of the discharge.
- (4) Information indicating the permitted discharge having a potential threat to the City of Magnolia collection and treatment system, personnel, or jeopardizes the receiving waters or the NPDES permit requirements;
- (5) Violation of any term, condition, limitation, or requirements of this permit;
- (6) Any misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting.
- (7) To correct typographical or other errors in the permit;
- (8) To Reflect transfer of the facility ownership and /or operation to a new/owner;
- (9) Upon request of the Permittee, provided such request does not create a violation of the applicable requirements, standards, laws or rules and regulations;
- (10) Follow the provision of this permit and any other order entered with respect thereto.

The filing of a request by the Permittee for a permit modification, revocation or reissuance, or termination or a notification of planned changes or anticipate noncompliance does not stay permit condition

PERMIT TERMINATION

The following conditions warrant termination of this permit to discharge waste into the City of Magnolia Wastewater system. The Superintendent may revoke a wastewater discharge permit for good cause, including but not limited to the following reason:

- (A) Failure to notify the Superintendent of significant changes to the wastewater prior to the changed discharge;
- (B) Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application;
- (C) Falsifying self-monitoring reports or refusal to submit requested reports;
- (D) Tampering with monitoring equipment;
- (E) Refusing to allow the Superintendent or a designated representative timely access to the facility premises and records;
- (F) Failure to meet the discharge limitations established in the permit;
- (G) Failure to pay applicable surcharges and fines assessed by the City of Magnolia;
- (H) Failure to provide reports, records, or information not deemed confidential or proprietary to the Superintendent;
- (I) Failure to provide advance notice of transfer of business ownership of a permitted facility;
- (J) Violation of any pretreatment standard or requirement, or any term of the wastewater discharge permit; or
- (K) Failure to appear at meetings when requested by the Superintendent.

PERMIT APPEALS

The Permittee may petition to appeal the terms of this permit within (30) thirty days of the effective date of the permit. The petition to appeal must meet the following conditions:

- (1) This petition must be in writing.
- (2) Failure to submit a petition in writing for review shall be deemed to be a waiver of the appeal.
- (3) In the petition, the Permittee shall indicate the permit provision to which it object, the reason for this rejection an alternate conditions, if any, it seeks to be placed in the permit

RECONSIDERATION OF A PERMIT

The filing of a request by the Permittee for a permit modification, revocation, reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition. The effectiveness of this shall not be stayed pending reconsideration by the City of Magnolia, however, at the discretion of the City, provisions which are being reconsidered may be stayed. If, after considering the petition any argument put forth, the City of Magnolia determines that reconsideration is proper, a new permit or an amendment shall be issued. The City of Magnolia decision not to reconsider a permit shall be considered final.

DUTY TO REAPPLY

If the Permittee wishes to continue an activity regulated by this permit after the expiration date, an application for a new permit must be submitted a least ninety (90) before the expiration date. The Permittee is not authorized to discharge following the expiration date unless written consent is provided by the City of Magnolia.

CONTINUATION OF EXPIRED PERMITS

An expired permit will continue to be effective and enforceable until a new permit is issued if:

- (1) The Permittee has submitted a completed application at least ninety (90) days prior to the expiration date of the existing permit;
- (2) The failure to reissue the permit prior to the expiration date is not due to any act or failure on the part of the Permittee;
- (3) The new permit can not be drafted until an ongoing extensive evaluation or study of the Permittee's facility is completed, as required by the City of Magnolia.

PROPER OPERATION AND MAINTENANCE

The Permittee shall at all time properly operate and maintain all facilities and systems of treatment and control and related appurtenances which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes, but is not limited to, effective performance, adequate funding, having adequate operating staff and proper training in laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup and auxiliary facilities or similar systems only when necessary to achieve compliance with the condition of this permit.

DUTY TO HALT OR REDUCE ACTIVITY

Upon the reduction of the efficiency, operational loss or failure of all or part of the treatment facility, the Permittee shall, to the extent necessary to maintain compliance with this permit, control production or discharge, or both until operation of the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is

reduced. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the condition of this permit.

BYPASS OF TREATMENT FACILITIES

Bypass or diversion of wastes from any portion of the treatment facilities is prohibited unless the following conditions are met.

- (1) Bypassing is unavoidable to prevent loss of life, personal injury or severe property damage;
- (2) There is no feasible alternatives to bypass such as the use of auxiliary treatment facilities, retention of untreated wastes or maintenance during normal periods of equipment down time. This condition is not satisfied if the Permittee could have installed adequate backup equipment to prevent a bypass which occurred during normal period of equipment down time or preventive maintenance.
- (3) The Permittee shall submit notification of bypass as follows:
 - (A) Anticipated: If the Permittee knows in advance of the need for bypass, it shall submit prior written notice to the Permittee at least ten (10) days before the date of the bypass.
 - (B) Unanticipated: The Permittee shall, by telephone, notify the Permittee immediately of an unanticipated bypass and shall submit a written report within (5) days. This report shall contain:
 - I. A description of the bypass, its cause and its duration.
 - II. Whether the bypass has been corrected; and
 - III. Steps being taken to reduce, eliminate and prevent recurrence of the bypass.

OPERATING UPSETS

The Permittee shall maintain and operate all pretreatment facilities in such a manner and condition as to ensure the efficiency and prevent prohibited discharges.

Any Permittee that experiences an upset in operation that places the Permittee in a temporary state of noncompliance with the provisions of this permit or with Ordinances # 90-3 or 95-12 shall inform the City of Magnolia at (870) 234-2454, immediately upon becoming aware of the upset, A written follow-up report of the upset shall be filed with the City of Magnolia within five (5) days. The report shall specify:

- (1) Description of the upset , the cause(s) thereof and the impact on the Permittee compliance status;
- (2) Duration of the noncompliance, including exact dates and times of noncompliance, and if not corrected the anticipated time the noncompliance is expected to continue; and
- (3) All steps taken or being taken to reduce , eliminate and prevent recurrence of the upset.

The report shall also demonstrate the treatment facility was being properly operated in a safe and prudent manner during the time of upset.

A documented and verified operational upset shall be an affirmative defense to any enforcement action brought against the Permittee for violations attributed to the upset.

PROTECTION FROM ACCIDENTAL DISCHARGE

The Permittee shall provide protection from the accidental discharge of prohibited material or other substances regulated by Federal, State, or Local regulations or standards.

Upon request, a detailed plan showing facilities and operating procedures to provide this protection shall be submitted to the City of Magnolia for review and approval.

REMOVED SUBSTANCES

Solids, Sludges, filter back wash or pollutants removed in the treatment course of wastewater shall be either utilized by industry or disposed of in accordance with section 405 of the Clean Water Act and subtitles C and D of the Resource Conservation And Recovery Act (RCRA).

FACILITY MONITORING AND INSPECTION

(A) Representative Samples

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring location specified in the permit and, unless otherwise specified, before the effluent joins or is mixed with other waste stream(s), body of water or substance. All equipment used for sampling and analysis shall have an internal calibration at least annually and must be inspected and maintained to assure their accuracy by a certified technician. A copy of the annual calibration check must be furnished to the City of Magnolia. During routine monitoring, equipment must be calibrated and properly set to collect the required samples at the Permittee facility.

Monitoring location shall not be changed without written notification to, and by the City of Magnolia. The Permittee shall request within thirty (30) days any request for change in the monitoring location. All cost for monitoring, analysis of samples, and data generation shall be borne by the Permittee.

(B) Flow Equipment:

If flow is installed, methods consistent with approved scientific practices shall be selected and used to ensure accuracy and reliability of measurement and volume of the monitored discharge. The equipment shall be installed, calibrated and maintained to ensure the accuracy of the measurements are consistent with the acceptable capability of the type of device. However, in no case shall the flow equipment measurement be more than 10 % of the actual flow discharged.

(C) Inspection and Entry

The Permittee shall allow the City of Magnolia or an authorized representative, upon the presentation of credentials, to:

- (1) Enter upon the Permittee premises where a regulated facility or activity is located or where records are maintained. All records and reports must be kept as a condition of this Permit;

- (2) Have access to any and copy any records which must be kept under conditions of this permit involving the wastewater characteristics and discharge without restriction unless the Permittee specifically request that the release of such information, process or methods of production entitled to protection as trade secrets, or proprietary information;
- (3) Inspect, at any reasonable time, including time of emergency, any facility equipment, practices or operation regulated under this permit;
- (4) Sample or monitor, for the purpose of assuring permit compliance, any substance or parameters at any location; and
- (5) Inspect any production, manufacturing, fabrication or storage where pollutants are, regulated under this permit or local ordinance could originate, be stored or be discharged into the sewer system.

RETENTION OF RECORDS

The Permittee shall retain records of all monitoring information including all calibration and maintenance records and all original recording charts of continuous monitoring instrumentation (*where applicable*) and records of all data used to complete the application for this permit, for a period of three (3) years. This period may be extended at anytime by the request of the City of Magnolia.

Destroying any past or current report or changing information as to falsify report or records may result in punishment under the criminal laws of the City of Magnolia, as well as being subjected to civil penalties and relief.

FALSIFYING INFORMATION

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

CIVIL AND CRIMINAL LIABILITY

Nothing in the permit shall be construed to relieve the Permittee from civil and / or criminal penalties for noncompliance under Federal, State, or Local laws or regulation;

A facility found to be in violation of any provision of the permit, local ordinance, or Federal Standard who is served with a written notice stating the nature of the violation and provided a reasonable time for satisfactory correction shall permanently cease all violations.

A Permittee who continues any violation beyond the time limit shall be subject to penalties, including, but not limited to, fines, revocation of permit, and / or termination of water and / or sewer services. When the Superintendent finds that a user has violated, or continues to violate any provision of the Sewer Use Ordinances., Wastewater Permit, Pretreatment standards or requirements, the Superintendent may fine such user in an amount not to exceed \$1,000 per day per each noncompliance incident. In case of monthly or other long-term average discharge limits, fines shall be assessed for each day during the period of violation.

In addition to civil and criminal liability, the Permittee violating any provision of this permit or Local Ordinance or causing damage to / or otherwise inhibiting the City of Magnolia wastewater disposal system shall be liable to the City of Magnolia for any expense, loss of damage caused by such violation (s) or discharge (s) .

The City of Magnolia shall bill the Permittee for the cost incurred for any cleaning, repair or replacement work caused by the violation. Refusal to pay the assessed cost shall constitute a separate violation of the ordinance.

CONFIDENTIAL INFORMATION

Information and data on a user obtained from reports, surveys, wastewater discharge permits, and monitoring programs, and from the Superintendent's inspection and sampling activities, shall be available to the public without restriction , unless the user specifically requests, and is able to demonstrate to the satisfaction of the Superintendent, that the release of such information would divulge information, processes, or methods of production entitle to protection as trade secrets under applicable State Law. Any such request may be asserted at the time of submission of the information or data. When requested and demonstrated by the user furnishing a report that such information should be confidential, the portions of a report which might disclose trade secrets or secret processes shall not be available for inspection by the public, but shall be made available immediately upon request to governmental agencies for use related to the NPDES program or pretreatment program, and in enforcement proceedings involving the person furnishing the report.

DEFINITIONS OF TERMS

Bypass:-The intentional diversion of wastewater from any portion of a treatment facility.

Composite Sample - A sample collected over time formed either by continuous sampling or by mixing discrete samples. The sample may be composited as a " time composite " (discrete sample aliquots or equal proportion collected in one (1) container at constant time intervals providing representative samples irrespective of stream flow) Composite samples shall be collected over a twenty-four (24) hour period. If the discharge is less than twenty-four (24) hours per day, the composite shall consist of at least four (4) parts collected during the operational hours of a twenty-four (24) hour periods. Aliquots shall be collected at time intervals not to exceed two (2) hours.

Cooling Water-

A. Uncontaminated cooling water - is water used for cooling purposes only which has no direct contact with any raw material, intermediate or final product and which does not contain contaminants detectable higher than that of the intake water.

B. Contaminated cooling water - is water used for cooling which may become contaminated either throughout the use of water treatment chemicals used for corrosion inhibitors or biocides or by direct contact with process material and / or wastewater.

Daily Maximum - The maximum allowable discharge or pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitation are

expressed in concentration, the daily discharge shall not exceed the arithmetic average measurement taken that day .

Grab Sample - - An individual sample collected in less than fifteen minutes.

DEFINITIONS OF TERMS (continued)

Monthly Average - the arithmetic average of the values for effluent samples collected during a calendar month.

Permittee - means an industrial, commercial, or non-residential users, which introduce pollutants from nondomestic sources into the municipal wastewater system.

POTW - Publicly Owned Treatment Works.

Severe Property Damage - Substantial physical damage to property, damage to the treatment facilities which would cause them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production .

Sludges - means the solids, residues, and precipitate separated from, or created in created in sewage by the unit process or publicly owned treatment works.

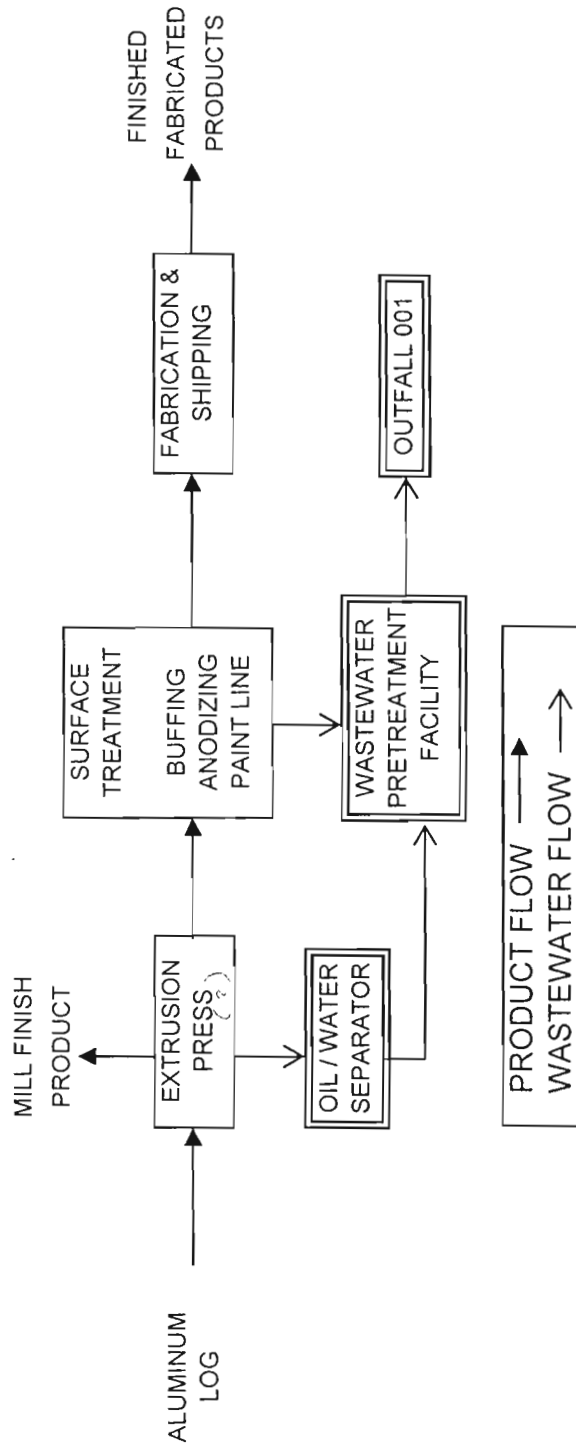
Total Toxic Organics - means the sum of the concentrations of all toxic organic pollutants.

Upset - An exceptional incident in which there is an unintentional and temporary noncompliance with technology-based permit effluent limitation because of factors beyond the reasonable controls of the Permittee, excluding such factors as operational error, improper designed or inadequate treatment facilities or improper operation and maintenance or lack thereof.

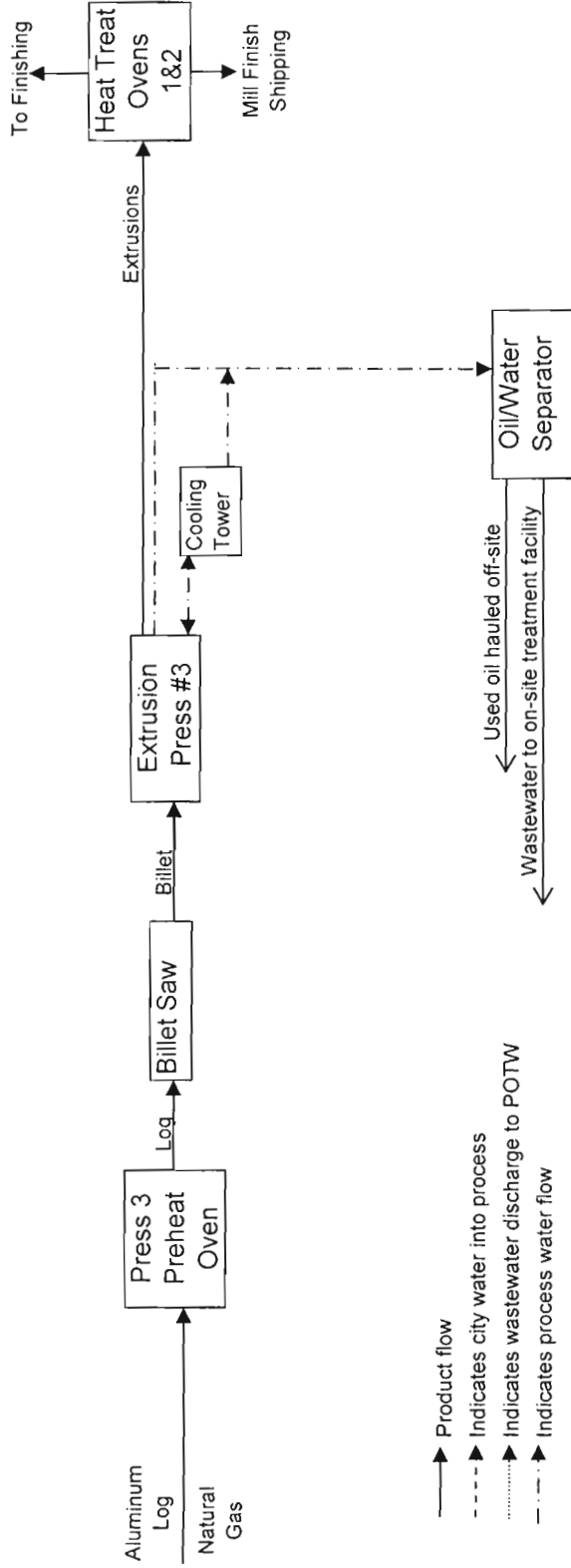
11/24/08
VIB 2-0000

PROCESS FLOW DIAGRAM

PLANT 2



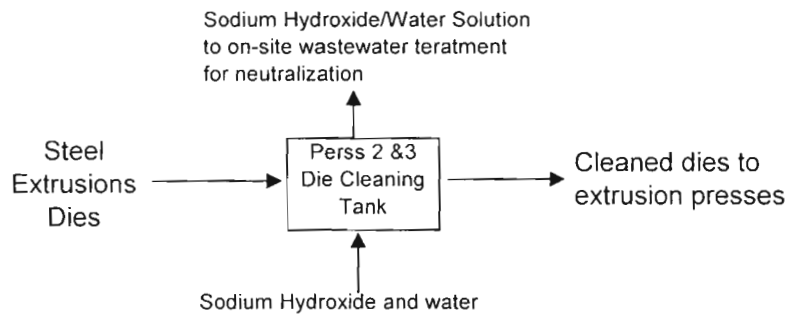
EXTRUSION PROCESS FLOW DIAGRAM



- Product flow
- - - - - Indicates city water into process
- Indicates wastewater discharge to POTW
- · - · - Indicates process water flow

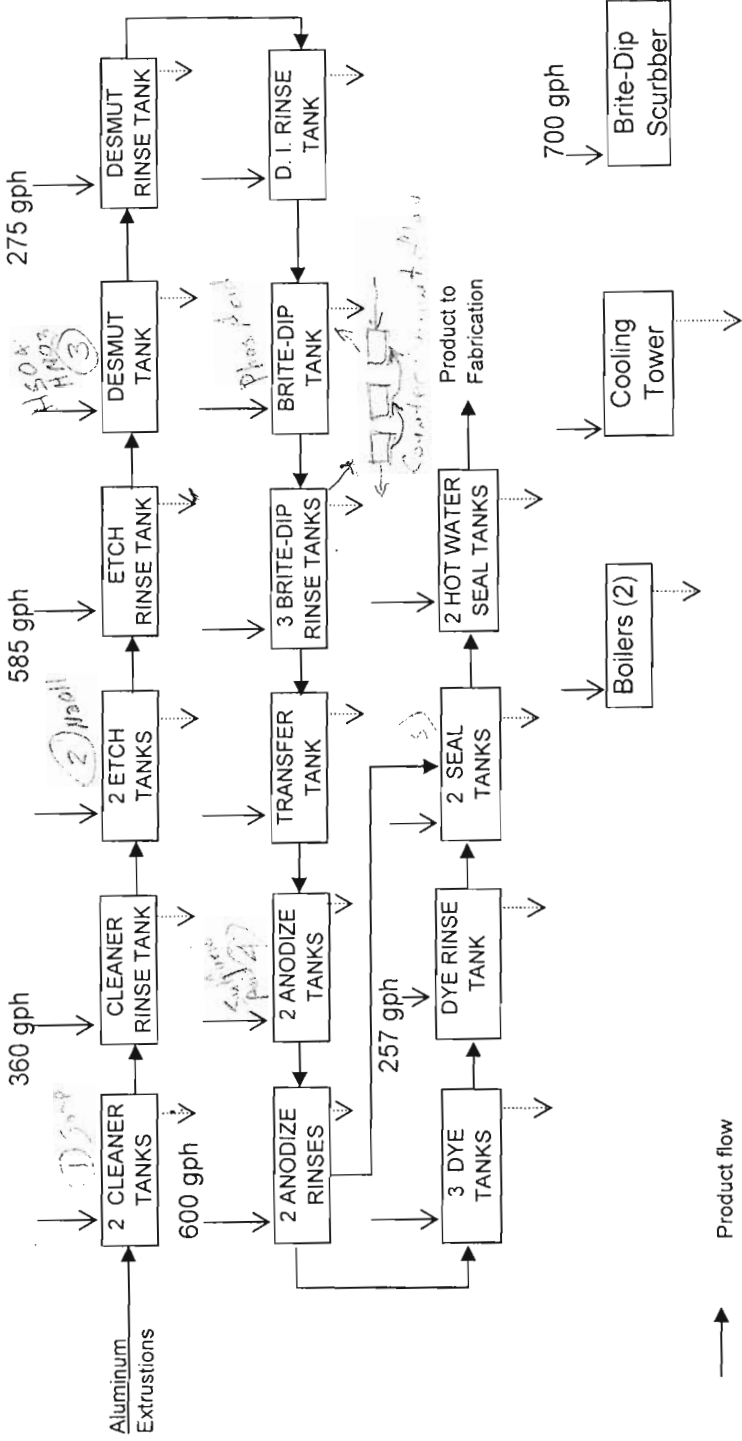
Note: Presently operating press 3 only. Press 2 is idled.

DIE PROCESSING FLOW DIAGRAM



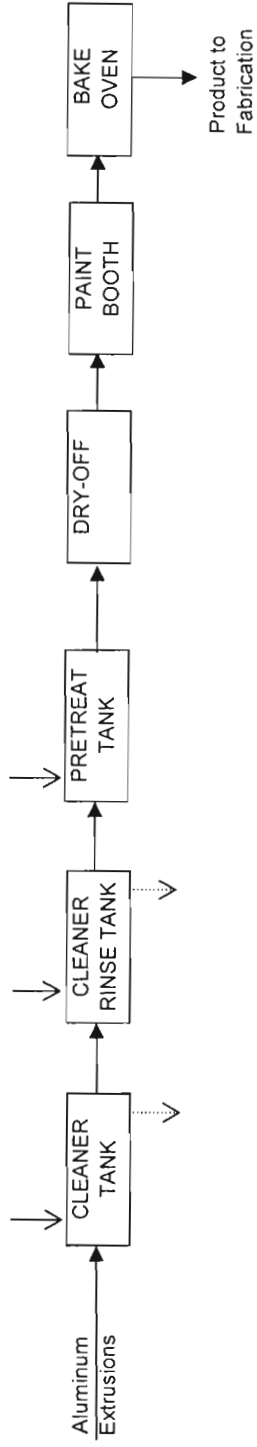
- - - - ► Indicates city water into process
- ► Indicates wastewater discharge to POTW
- · - · ► Indicates process water flow

LINE 1 ANODIZING FLOW DIAGRAM



- Product flow
- Indicates city water into process
- Indicates wastewater discharge to POTW after treatment (Outfall 001)
- Indicates process water flow

PAINT LINE PROCESS FLOW DIAGRAM



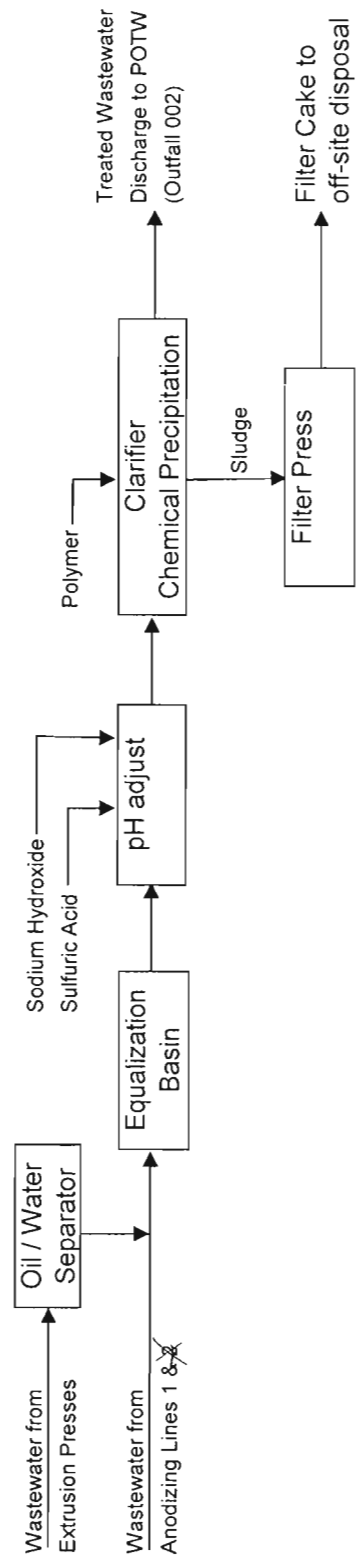
→ Product flow

→ Indicates city water into process

- - - - -> Indicates wastewater discharge to POTW after treatment

- . - . - .> Indicates process water flow

WASTEWATER TREATMENT SYSTEM FLOW DIAGRAM



Arkansas Department Of Environmental Quality

5301 Northshore Drive
North Little Rock, AR 72118

- CERTIFICATE OF ANALYSIS -

Attn:
Our Lab#: 2008-3454
Your Sample ID: SAPA - SAPA (AM)
Sample X

Phone:
FAX:

Ext:

Report Date: 12-Dec-08

ICP/MS-T

Aluminum		932	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		1910	µg/L	12/11/2008	5	25
Cadmium	<	10.0	µg/L	12/11/2008	0.3	1
Calcium		14.4	mg/L	12/11/2008	0.04	0.04
Chromium	<	10.0	µg/L	12/11/2008	0.3	1
Cobalt	<	10.0	µg/L	12/11/2008	0.5	1
Copper		22.2	µg/L	12/11/2008	0.5	1
Iron		476	µg/L	12/11/2008	10	20
Lead	<	10.0	µg/L	12/11/2008	0.1	1
Magnesium		1.34	mg/L	12/11/2008	0.1	0.1
Manganese		70.4	µg/L	12/11/2008	0.2	1
Nickel		34.4	µg/L	12/11/2008	0.5	2.5
Potassium		12.6	mg/L	12/11/2008	0.05	0.1
Selenium	<	20.0	µg/L	12/11/2008	0.5	2
Silicon Dioxide		3.31	mg/L	12/11/2008	0.02	0.2
Silver	<	50.0	µg/L	12/11/2008	1	5
Sodium		839	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	<	30.0	µg/L	12/11/2008	2	3

Oil & Grease

Oil and Grease	<	1.4	mg/L	12/8/2008	1.4	1.4
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Arkansas Department Of Environmental Quality

5301 Northshore Drive
North Little Rock, AR 72118

- CERTIFICATE OF ANALYSIS -

Attn:
Our Lab#: 2008-3455
Your Sample ID: SAPA - SAPA (PM)
Sample X

Phone:
FAX:

Ext:

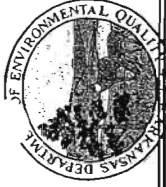
Report Date: 12-Dec-08

ICP/MS-T

Aluminum		775	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		1710	µg/L	12/11/2008	5	25
Cadmium	<	10.0	µg/L	12/11/2008	0.3	1
Calcium		14.0	mg/L	12/11/2008	0.04	0.04
Chromium	<	10.0	µg/L	12/11/2008	0.3	1
Cobalt	<	10.0	µg/L	12/11/2008	0.5	1
Copper		20.9	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		1.31	mg/L	12/11/2008	0.1	0.1
Manganese	<	10.0	µg/L	12/11/2008	0.2	1
Nickel		32.0	µg/L	12/11/2008	0.5	2.5
Potassium		12.2	mg/L	12/11/2008	0.05	0.1
Selenium	<	20.0	µg/L	12/11/2008	0.5	2
Silicon Dioxide		3.28	mg/L	12/11/2008	0.02	0.2
Silver	<	50.0	µg/L	12/11/2008	1	5
Sodium		840	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	<	30.0	µg/L	12/11/2008	2	3

Oil & Grease

Oil and Grease	<	1.4	mg/L	12/8/2008	1.4	1.4
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Facility, Project, or Complainant Name and county SAPA Ext. (am. & p.m.) } Magnolia Everett Pleting		AFIN Number (0000000) 14-00046 N/A		ADEQ Division or Other (Describe) Water Pretreatment 10201		Function Code		Sample Type <input type="checkbox"/> CSI <input checked="" type="checkbox"/> Other Compliance <input type="checkbox"/> Complaint <input type="checkbox"/> Fish Kill <input type="checkbox"/> Other (describe)		Media Code W - water G - groundwater L - liquid (not water) S - soil or solid E - edible tissue F - whole fish B - other		Preservation Code A - Cool to 4°C B - Sulfuric acid (pH < 2) C - Nitric acid (pH < 2) D - NaOH (pH > 12) E - Sodium thiosulfate F - Other (specify)					
Printed Name of Sampler(s) Allen Gilliam		Date Collected (mm/dd/yy)		Time Collected (hh:mm ?m)		Composite		Grab		No. of containers		Preservation code (see codes)		Media (see codes)		Parameters Requested	
Sample ID		Date Collected (mm/dd/yy)		Time Collected (hh:mm ?m)		Composite		Grab		No. of containers		Preservation code (see codes)		Media (see codes)		Parameters Requested	
SAPA (am.) 63.29ppm		12/2/08		11:25 AM		1		1		3		C W		W		✓ T Metals	
SAPA (p.m.) 61.39ppm		12/2/08		3:55 PM		1		1		2		B W		W		✓	
Everett Pleting		12/3/08		9:55 AM		1		1		1		C W		W		✓	
Relinquished by Allen Gilliam		Date 12/4/08		Time 9:10 AM		Received by		Date		Time		Remarks					
Relinquished by		Date		Time		Received by		Date		Time		Remarks					
Relinquished to laboratory by		Date		Time		Received for laboratory by Jeff Pleting		Date 12/4/08		Time 9:10		Remarks 204					