

ADEQ

ARKANSAS
Department of Environmental Quality

November 14, 2011

Brian Niswonger
President
Industrial Metal Finishing
P.O. Box 326
Pocahontas, AR 72455

Re: Industrial Metal Finishing #1 (IMF #1) Pretreatment Compliance Assurance Visit (ARP001023;
City of Walnut Ridge #AR0046566)

Dear Mr. Niswonger,

Under 40 CFR 403.8(f)(2)(v), "[ADEQ will] Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards..."

On 10/18/11, a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel at your facility, Industrial Metal Finishing #1 (IMF #1).

Two grab samples were taken at separate times during the CAV. ADEQ's laboratory analysis indicated your facility is in compliance with the Metal Finishing Standards in 40 CFR 433.17.

REQUIREMENT

Under **40 CFR 403.12(b)(3)**, "Description of operations. [IMF #1] shall submit...[a] description...includ[ing] a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes."

As discussed during the CAV an updated wastewater flow schematic should be submitted after upgrades were made to the pretreatment system and wastewater flow piping to the discharge (sampling) point. The old schematic on file (Attachment A-3) does not adequately portray existing conditions. It is wished this schematic could be better "seen" on more than one (1) sheet of paper to better understand the various flows from your processes through pretreatment to the discharge point. Please submit the requisite process/pretreatment wastewater flow schematic within sixty (60) days from the date on this correspondence. This submittal may be in the form of a PDF attachment in an e-mail to this office.

Please keep this and all Pretreatment correspondence on file for future reference.

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

cc: Lester Herring / Water & Wastewater Manager / 216 Southwest 4th Street / Walnut Ridge, AR 72476

Attachments: "Pretreatment Industrial Inspection" (CAV); ADEQ's lab analysis for all 40 CFR 433 metals (A-1 and A-2) and Outdated IMF #1 wastewater flow schematic (A-3)

Pretreatment Industrial Inspection


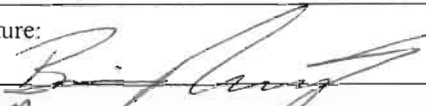
Facility Information

Facility Name: Industrial Metal Finishing #1	Site Address: 329 Frazier Street, Walnut Ridge, 72746
Signatory Authority (Name & Title): Brian Niswonger / President	
Phone: 870.886.7531	Mailing Address (if different): P.O. Box 326, Pocahontas, AR 72476
Fax: 870.886.9546	
Address: same	Corporate Owner Name and address (if applicable): N/A
Contact Person (Name & Title): Brian Niswonger / President	
e-mail: bniswonger@indmetalfinishings.com	e-mail: N/A
Facility Tracking #ARP001023 AFIN # none to date	Last Inspection Date: 11/18/09
POTW (City) IU discharges to: Walnut Ridge, NPDES #AR0046566	
Industrial Classification: <input checked="" type="checkbox"/> Categorical	<input type="checkbox"/> Significant
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17, the Metal Finishing (PSNS)	

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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 5 of 10
B. Pollution Prevention Activities	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 6 of 10
C. Pretreatment System	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 7 of 10
D. Chemical Storage	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 8 of 10
E. Spill/Slug Control Plan	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 9 of 10
F. Self-Monitoring/TOMP (submitted/approved 5/21/10)	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 10 of 10

Comments :

Inspector's Name (Print): Allen Gilliam	Signature: 
IU Rep's Name (Print): <i>Brian Niswonger</i>	Signature: 
Date and Time Inspection Ended: 10/18/11 @ 11:25 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 with sampling

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
<input checked="" type="checkbox"/> Records Review	<input checked="" type="checkbox"/> RCRA information	<input checked="" type="checkbox"/> Process/Flow/Pretreatment Schematics
<input checked="" type="checkbox"/> IU sampling procedures	<input 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:

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: Adequate, no comment.

Process Area(s): Adequate, no comment.

Pretreatment System: Adequate, no comment.

Self-Monitoring Procedures: Adequate, no comment

Spill/Slug Control Plan: The potential for a slug discharge was evaluated and it was determined the potential for a harmful slug was negligible.

Sampling Point: See below discussion under "Visual Inspection of Discharge Lines/Points" on page 9.

Chemical Storage: Adequate, no comment.

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 10/18/11 @ 7:55 a.m.		SIC/NAICS code(s): 3471 / 332813	
IU Reps/Titles: Brian Niswonger / President		ADEQ Reps/Titles: Allen Gilliam / ADEQ State Pretreatment Coordinator	
End product(s): Zn plate, Zn phosphatize or black oxide different customer stampings, fasteners and various machine parts		Approx. # of units produced: ~ 10 tons of metal pieces processed/week	
Days of Operation: 3 to 5 per week		Days of Production (if different): same	
Hours of Operation: 8 a.m. to 4:30 p.m.		Hours of Production (if different): same	
Shift 1, hrs.: 8 a.m. to 4:30 p.m.	Shift 2, hrs.: N/A to	Shift 3, hrs.: N/A to	
# of Employees: 4	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? Holidays			
Are there designated plant clean-up days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If yes, when? 1/month they do a thorough sweeping of both buildings.			
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:			
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
If Yes, explain: Outside inspector needs to call facility rep. first to determine if they have any production ongoing if sampling is to be conducted.			
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 required.			
Has there been any changes since the last inspection regarding the following items:			
Plant/flow/process layout? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> They have "cleaned up" the production area in building #1 where the Zn phosphatizing and black oxidizing takes place. Walkways between processes are now made up of painted wooden pallets to avoid tripping hazards on exposed piping. The old below grade sampling trough is no longer in use and is also covered by painted wooden pallets. They've re-routed their pretreated wastewater to gravity flow to a half "cut-out" blue polybutylene barrel. The sampling point is now easily accessible from a 3" PVC pipe which discharges to this "half" barrel, then gravity flows through a ~2" hole piped directly to City's sewer system. They've also changed the polymer injection point to facilitate better mixing at the pump prior to their clarifier. Wastewater flow schematics need to be updated.			
Processes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Production Levels? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
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: Flows have remained fairly static.			
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 type="checkbox"/> N/A <input checked="" 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"/>			

Attachment A: Industrial Process(es)

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

1. Zn phosphatizing	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Rinses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Zn Plating w/tri-chrome	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5.	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Black Oxide	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	6.	Yes <input type="checkbox"/> No <input type="checkbox"/>

Were processes visually inspected? Yes No N/A

Brief description of process(es): Facility has three lines, one for Zn plating (Bldg. #2), Zn phosphating and one for the black oxide (Bldg. #1). Bldg. #1: Zn phosphatizing consists of 8 tanks where workpieces are Zn phosphatized, fresh water rinsed, alkaline cleaned/fresh water rinsed, muriatic acid washed/rinsed and sent through a hot wax-oil finish tank, then set out to cool. The hot wax-oil tank is surrounded by oil-sorb material. Parts are placed in an upright centrifuge type container which slings the excess wax-oil off, captured and re-used. The black oxide line consists of 8 tanks starting with a hot sodium hydroxide bath, fresh water rinse, muriatic acid washed, fresh water rinsed, alkaline cleaned/fresh water rinsed, Zn phosphatized/fresh water rinsed and dipped in the hot wax oil tank. Parts are then taken out of the wax-oil tank and allowed to cool. Similar to above, parts are placed in centrifuge and excess wax-oil is re-used.

Bldg. #2: Not necessarily in parts movement order, the Zn plating line consists of 14 tanks starting with an alkaline cleaner bath/soak, an electric alkaline cleaner, soap rinse, 29% muriatic acid bath, fresh water rinse, Zn plating bath/rinse, nitric acid rinse, clear tri-valent chromate bath/rinse, yellow tri-valent chromate bath, hot water rinse with a final hot alkaline bath sealer. Any wastewater from this operation is collected in a sump then pumped over to building #1's first below grade pH treatment sump. All tanks are labeled and made of polypropylene (except for two of them). Parts are placed into a heated centrifugal drier. The floor in this building is sloped to drain any fluids to the "catch pit" (4' X 8' X 3' deep) which is pumped to Bldg. #1's pH sump. Cleaners and rinses are heated as well as the plating tank (when necessary). The plating tank is also in-line filtered with 48 paper disk "wafers" to remove Fe. Diatomaceous earth is used as a filter aid in this upright cylindrical unit. Spent acid/caustic baths are pumped/saved into one of two wire grated totes (~350 gal.) and metered into Bldg. #1's sump about 4 times/yr. at about 30 to 50 gpd so no "slug" loads will be seen in their pretreatment system.

General observations of facility's indoor housekeeping: See description in "Plant/flow/process layout" above. Not as "cluttered" and now has much better lighting.

General observations of area outside facility's building: Uncluttered with no chemical storage, raw material or chemicals stored.

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

<input checked="" type="checkbox"/> Process Rinse Overflows Continuous at ~ 4,900 gpd	<input type="checkbox"/> Equip. Cleanup	<input type="checkbox"/> Floor Cleanup	<input checked="" type="checkbox"/> Spent Bath Solutions Batch discharged at 30 to 50 gpd ~ every 3 months
<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 checked="" type="checkbox"/> Spent Rinse Tanks Batch discharged ~ 2/yr. for cleaning.	<input type="checkbox"/> Equipment Coolants	<input type="checkbox"/> Non-Contact Cooling Water

List Major Raw Materials and some major Chemicals used:

Steel parts, NaOH, Zn phosphate, tri-valent chrome, Zn Chloride, Hydrochloric acid, boric acid and polymers.

Check Waste Stream Pollutants of Concern from Process(es):

<input type="checkbox"/> BOD	<input checked="" type="checkbox"/> CN ⁻	<input checked="" type="checkbox"/> Metals (List) All 40 CFR 433 metals	<input type="checkbox"/> Solvents: TOMP was submitted and approved on 5/21/10.
<input type="checkbox"/> TSS	<input type="checkbox"/> Cl ₂	<input type="checkbox"/> pH	<input type="checkbox"/> O&G

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

The manhole which just had a 4" drainpipe is sealed with a compression fitting.

Attachment B: Pollution Prevention (P2) / Recycling Activities

Does the facility have a written P2 Plan? Yes No

Does this facility practice P2? Yes No

Environmental Management System in place? Yes No

ISO Certified? Yes No

Written Standard Operating Procedures? Yes No

Explain: They have detailed "operation" sheets for different customer parts.

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

Explain:

Water Reuse: Yes No

Explain: They do practice counter-current flow in one section of their Zn plating line.

Cost Accounting to Track Savings: Yes No

Explain:

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

Explain: With unknown, unanticipated customer orders, this system would not be possible, but they do only keep an extra barrel or tote of necessary chemicals on-hand.

Employee Training: Yes No

Explain: "On-site, as needed".

Spent Solvent Reclamation? Yes No None on location

Explain:

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

Explain: Pallets and newspaper

Recycle Waste Oil, Solvents, and Lubricants? Yes No

Explain: Any waste oil from their disk oil skimmers is collected in an elevated poly tank for use in their own building heater.

Other Activities:

P2 Equipment/Practices in use:

In-process bath filtration on Zn plating line

Aqueous Cleaning Solutions

Fog Spray Rinsing

Countercurrent Flow Rinsing

Dragout Collection Trays

Seal-Less Pumps

Air Jets to Blow Parts Dry

Secondary Containment of Process Solutions

Aqueous Paint Stripping Solutions

Bead Blasting to Remove Paint

Water Soluble Cutting Fluids

Recycle Overspray

In-Process Recycle (Ion Exchange, Reverse Osmosis)

Conductivity Meters

Dead Rinse Tanks

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment? Yes No N/A

Are they pretreated prior to discharge to the sanitary sewer? Yes No N/A

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

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 checked="" type="checkbox"/> In-line filtration of Zn plating bath	<input checked="" type="checkbox"/> Flow Equalization	<input type="checkbox"/> Ozonation	<input type="checkbox"/> Chlorinating
<input checked="" type="checkbox"/> Chemical Precipitation	<input 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 type="checkbox"/> Sedimentation	<input type="checkbox"/> Silver Recovery
<input checked="" type="checkbox"/> Belt/Disk Oil Skimmer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order): The Zn plating line is in Bldg. #2. All w.w. from that operation is collected in its own "catch pit". Its contents are float controlled pumped to Bldg. #1's concrete floor sump where it is pH adjusted/mixed. Bldg. #1's w.w. is also fed to this same floor sump. The w.w. is pumped overhead to a 3,000 bulk storage tank and float controlled pumped as necessary into a mixing polymer tank next to the clarifier. They've changed the site of polymer injection to this pump for better mixing instead of at the floor sump. After thorough mixing in the "polymer" tank, w.w. gravity flows into an inclined plate clarifier where the floc settles. The sludge is pumped to a holding/settling tank ~4 times/day and periodically metered into the sludge press about once or twice per day. Water from the filter press is sent back to the main floor sump for recycling through pretreatment. Supernatant from the clarifier is gravity flowed to newly arranged "half-cut" polypropylene barrel via a 3" PVC pipe and then drained to the City.

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

Not exactly since they've moved the polymer injection site and upgraded their sampling point. Facility rep. indicated he'd start working on a revised drawing to have a most accurate schematic on file.

System Operator(s) Name: Brian Niswonger, Scott Glenn, James Rodney and Doug Coley

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

List Name(s) and License classification:

Is the discharge from the Pretreatment System? Batch Continuous Combination

Some rinses are continuously overflowed while the process baths are slowly metered in after they're spent.

Volume of discharge: ~ 4,900 gpd (depends highly on production)

Describe process from which batch originated (spent bath, e.g.): Facility batch discharges their spent bath tanks (stored in totes). Most of rinse tanks are continuously overflowed with a few being counter-current.

Approximate duration of batch discharge: Wastes from spent acid or caustic totes (350 gallons each) are metered in with continuous rinse overflows quarterly at 30 to 50 gpd.

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
City		

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. Various chemicals in varying amounts are stored near where they are to be used.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer		
2. Their "designated" storage area is segregated into a separate room next to the Zn phos, black oxide room.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer		
3.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer		
4.	<input type="checkbox"/> Yes <input 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 type="checkbox"/> Dikes, Berms for Containment	<input checked="" type="checkbox"/> Plugs for Floor Drains			
<input checked="" type="checkbox"/> Secondary "Catch Pits" under barrels	<input type="checkbox"/> Premix (low) Concentrations			
<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 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: Clean, no evidence of any recent spills, but there's no secondary containment or guard posts.				
Chemical handling procedures (totes, dolly, buckets, hardline, etc):				
All the above.				

Attachment E: Spill/Slug Control Plan (Slug potential evaluated as highly unlikely by this inspector)

Does the facility have a Spill/Slug control plan? <i>Slug discharge potential determined to be negligible.</i>	<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 type="checkbox"/> N/A
(A) Describes discharge practices including non routine batch (slug) discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(B) Describes storage and handling of chemicals	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(C) Procedures for immediate notification to POTW of slug discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
2. Describes procedures and equipment for emergency response	<input 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 type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	<input type="checkbox"/> yes <input checked="" 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?	<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?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no
Has there been any non-routine, episodic discharges or chemical spills in the past year?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? <input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point: Facility has abandoned the old below grade sampling trough and covered it with painted wood pallets. The new sampling point is now directly from a 3" PVC pipe with w.w. gravity flowing from the clarifier into a "half-cut" modified polypropylene barrel. Sample bottles can now be place directly under this 3" pipe to take grab samples with little chance of contamination. Wastewater continues to gravity flow via pipe outside to the City's sewage collection system. Sampling point was clean and clear of any type of overspray or splashes.	
Total Flow Monitoring Point: Strictly using City water usage meter and subtracting sanitary sewage usage (~20 gpd) from the few employees they have.	
Point of Connection: See above.	

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.

See above description in "Visual Inspection of Discharge Lines/Points". Brian Niswonger, the President of the company will usually do the sampling.

Where is the sample point located?

<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 (intermittent production)
<input type="checkbox"/> Safety Hazards Identified	<input type="checkbox"/>	<input type="checkbox"/>

Is the Sample Collection Site Adequate? Yes No N/A

Does the facility rep. request a split sample on this sampling/inspection? Yes No

Does the facility perform self-monitoring tests in-house? *HACH (spectrophotometric) meter for in-house use only. Brian plans to split samples w/contract lab for comparison purposes.* Yes No N/A

If no, Record the name and address of Contract Lab: American Interplex, Little Rock

Automatic Sampler or Manual

IU Self-Monitoring Results reviewed: *From last semi-annual report dated 4/28/11.* Yes No N/A

Is the Contract Lab certified by ADEQ for test parameters? Yes No N/A

Dates and Times of Sample Analysis Recorded? Yes No N/A

Correct Methods Used for Test Analysis (Refer To 40CFR Part 136) Yes No N/A

EPA recommended holding times being met (Refer to 40CFR Part 136) Yes No N/A

Chain of Custody Records for Self-Monitoring Samples Reviewed Yes No N/A

Were correct Sample Types Collected Yes No N/A

Dates and times of Sample Collection Recorded? Yes No N/A

Were Samples preserved correctly (refer to 40CFR Part 136) Yes No N/A

Were Self Monitoring records on file for past 3 years? Yes No N/A

List the parameters the facility monitors and the frequency: All parameters semi-annually,

<input checked="" type="checkbox"/> Cd(t)	<input checked="" type="checkbox"/> Cu(t)	<input checked="" type="checkbox"/> Cr(t)	<input checked="" type="checkbox"/> Ni(t)	<input checked="" type="checkbox"/> Pb(t)
<input checked="" type="checkbox"/> Ag(t)	<input checked="" type="checkbox"/> Zn(t)	<input type="checkbox"/> pH	<input checked="" type="checkbox"/> CN ⁻ (t)	<input type="checkbox"/> CN ⁻ (a-c)
<input type="checkbox"/> TTO-Vol	<input type="checkbox"/> TTO-B/N	<input type="checkbox"/> TTO-A.E.	<input type="checkbox"/> TTO-Pest	<input type="checkbox"/> Cr(hex)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

How does the IU report TTO? Analysis Certification Statement with 5/21/10 TOMP on file.

Does the facility have a Toxic Organic Management Plan? Yes No N/A

If yes, Does the plan show how toxic organics are used, stored, and disposed? Yes No N/A

List the date of the last revision to the TOMP: 5/21/10

Is the TOMP being followed as written? Yes No N/A (If no, provide explanation in comments.)

If no, is there evidence that a TOMP is needed? Yes No N/A (If yes, provide description of evidence in comments.)

Comments: Facility's 5/21/10 TOMP is fairly simple. In this inspector's opinion, the facility does not have the quantity of any toxic organics on-site, which, if all were poured into the City's sewer system at the same time would constituted a toxic quantity. Facility's TOMP reflects this.

Attachment A-1

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:** IMF #1A
Lab ID: 2011-3322 **Collection Date:** 10/18/2011 8:26:00 AM
Matrix: Water

Analyses

<i>Total Metals by EPA 200.8</i>		<i>EPA 200.8</i>	<i>Batch: 11103101 Run: 1</i>		
	<u>Result</u>	<u>Reporting Limit</u>	<u>MDL</u>	<u>Qual</u>	<u>Unit</u>
Aluminum	<20.0	20.0	20		ug/L
Antimony	<10.0	10.0	5		ug/L
Arsenic	<1.00	1.00	0.5		ug/L
Barium	75.0	10.0	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	660	25.0	5.0		ug/L
Cadmium	1.49	1.00	0.3		ug/L
Calcium	39.4	0.04	0.04		mg/L
Chromium	73.6	1.00	0.3		ug/L
Cobalt	17.0	1.00	0.5		ug/L
Copper	3.41	1.00	0.5		ug/L
Iron	549	20.0	10.0		ug/L
Lead	<1.00	1.00	0.1		ug/L
Magnesium	8.11	0.1	0.1		mg/L
Manganese	8.04	1.00	0.2		ug/L
Nickel	2.59	2.5	0.5		ug/L
Potassium	31.2	1.00	0.05		mg/L
Selenium	<2.00	2.00	0.5		ug/L
Silver	<5.00	5.00	1.0		ug/L
Sodium	219	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	<2.5	2.5	1.0		ug/L
Zinc	784	3.00	2.0		ug/L
Dilution Factor	1.00				
Analyzed By	Joe Semberski				
Analysis Date/Time	Oct 27 2011 5:38PM				
Prep By					
Prep Date/Time					

Attachment A-2

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: IMF #1B

Lab ID: 2011-3323

Collection Date: 10/18/2011 9:40:00 AM

Matrix: Water

Analyses

Total Metals by EPA 200.8

EPA 200.8

Batch: 11103101 Run: 1

	<u>Result</u>	<u>Reporting Limit</u>	<u>MDL</u>	<u>Qual</u>	<u>Unit</u>
Aluminum	<20.0	20.0	20		ug/L
Antimony	<10.0	10.0	5		ug/L
Arsenic	<1.00	1.00	0.5		ug/L
Barium	46.3	10.0	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	805	25.0	5.0		ug/L
Cadmium	<1.00	1.00	0.3		ug/L
Calcium	24.6	0.04	0.04		mg/L
Chromium	53.8	1.00	0.3		ug/L
Cobalt	9.94	1.00	0.5		ug/L
Copper	3.10	1.00	0.5		ug/L
Iron	483	20.0	10.0		ug/L
Lead	<1.00	1.00	0.1		ug/L
Magnesium	5.86	0.1	0.1		mg/L
Manganese	6.52	1.00	0.2		ug/L
Nickel	<2.5	2.5	0.5		ug/L
Potassium	39.7	1.00	0.05		mg/L
Selenium	<2.00	2.00	0.5		ug/L
Silver	<5.00	5.00	1.0		ug/L
Sodium	276	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	<2.5	2.5	1.0		ug/L
Zinc	503	3.00	2.0		ug/L

Dilution Factor

1.00

Analyzed By

Joe Semberski

Analysis Date/Time

Oct 27 2011 6:07PM

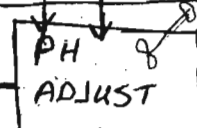
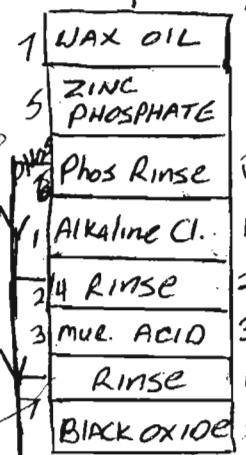
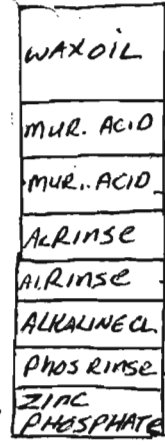
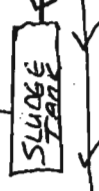
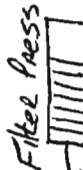
Prep By

Prep Date/Time

11/09

Attachment A-3

BUILDING # 1



suburic metered caustic metered

Steel Tanks

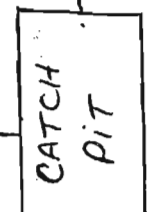
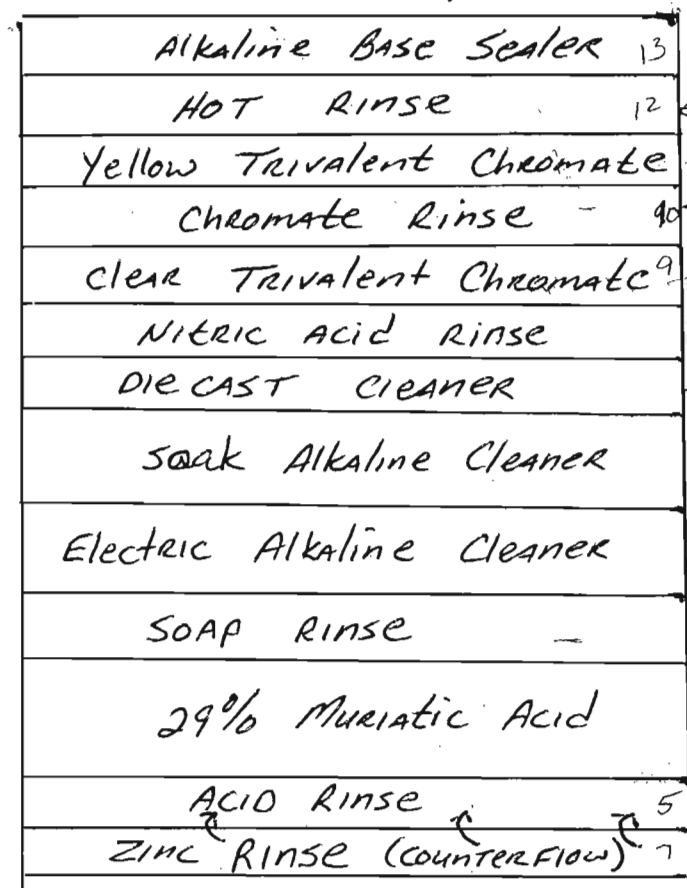
sampling pt POT

Workpiece Flow

min 2d1

Inj. Polymer

3-5 dpp/LK



Prod Rest of tanks polypropylene

BUILDING # 2

Chloride Zinc Bath (used in winter plating) 6

in process filter to remove Fe's

city H2O meter for this bldg. use 2nd scale