

# ADEQ

ARKANSAS  
Department of Environmental Quality

December 14, 2009

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

Re: Industrial Metal Finishing (Tracking #ARP001023) Pretreatment Compliance Assurance Visit in Walnut Ridge (NPDES #AR0046566)

Dear Mr. Niswonger,

On 11/18/09, a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel at your facility. This to satisfy 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" per 40 CFR 403.8(f)(2)(v).

This office wishes to extend its appreciation 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.

## FINDINGS

1) The wastewater being discharged was grab sampled throughout the period of the inspection and shows your facility to be in violation of the zinc Pretreatment Standards located in 40 CFR 433.17. Averaging the results of the separate samples (see Attachments A-1 through A-3); your wastewater measured 4.71 mg/l. 40 CFR 433.17's daily maximum limit and monthly average not to exceed are 2.61 mg/l and 1.48 mg/l respectively.

Per 40 CFR 403.12(g)(2), "...[Industrial Metal Finishing] shall also repeat the sampling and analysis and submit the results of the repeat analysis to the [ADEQ] within 30 days after becoming aware of the violation." Please explain what the cause of the violation was and what corrective action is going to be taken to avoid future violations.

2) Under 40 CFR 433.12(a), "In lieu of requiring monitoring for TTO (total toxic organics)...in the case of indirect dischargers...[ADEQ] may allow dischargers to make the following certification statement: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation...for (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan [TOMP] submitted to...[ADEQ]."

Industrial Metal Finishing is currently not sampling for the TTOs in 40 CFR 433 for compliance, but is making the certification “in lieu of monitoring”. No “approvable” TOMP could be found in ADEQ’s file nor could be produced during the inspection.

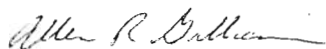
Industrial Metal Finishing has two (2) options: Submit an “approvable” TOMP (this office provided two sample TOMPs) or immediately begin sampling for the TTOs in 40 CFR 433.11 which can be found at this website: [http://edocket.access.gpo.gov/cfr\\_2005/julqtr/40cfr433.11.htm](http://edocket.access.gpo.gov/cfr_2005/julqtr/40cfr433.11.htm) .

As mentioned in the inspection, there appeared to be very few toxic organics on-site and a simple TOMP could be drafted for approval.

Find attached supporting documentation: the “Pretreatment Industrial Inspection” and ADEQ’s Certificate of Analysis for all 40 CFR 433 metals analyzed by ADEQ’s lab (Attachments A-1, A-2 and A-3).

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

Sincerely,



Allen R. Gilliam  
ADEQ State Pretreatment Coordinator

cc: Pretreatment File

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

Attachments

## Pretreatment Industrial Inspection


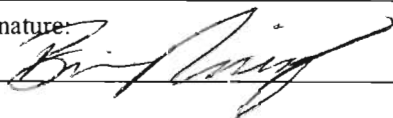
### Facility Information

Facility Name: Industrial Metal Finishing	Site Address: 329 Frazier Street, Walnut Ridge, 72746
Signatory Authority (Name & Title): Brian Niswonger / Production Manager	
Phone: 870.886.7531	Mailing Address (if different): <del>same</del>
Fax: 870.886.9546	P.O. Box 326 Pocahontas 72455
Address: same	Corporate Owner Name and address (if applicable): n/a
Contact Person (Name & Title): Brian Niswonger / Production Manager	
Phone: same	Phone:
Fax: same	Fax:
e-mail: bkkniswonger@bscn.com	Corporate CEO:
e-mail:	e-mail:
Facility Tracking #ARP001023 AFIN # none to date	Last Inspection Date: 6/23/05
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	

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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 of
B. Pollution Prevention Activities	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of
C. Pretreatment System	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of
D. Chemical Storage	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of
E. Spill/Slug Control Plan	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of
F. Self-Monitoring/TOMP	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of

Comments :

Inspector's Name (Print): Allen Gilliam	Signature: 
IU Rep's Name (Print) <i>Brian Niswonger</i>	Signature: 
Date and Time Inspection Ended: 11/18/09 @ 3:00 pm	

**I. Summary of Inspection**

**A. Inspection and Objective (Complete Before Inspection)**

<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Bi-Annual	<input type="checkbox"/> Spill/Slug	<input type="checkbox"/> Unscheduled
<input type="checkbox"/> New Construction	<input type="checkbox"/> Noncompliance	<input type="checkbox"/> Follow-up	<input type="checkbox"/> Complaint

Inspection Objective(s): Compliance Assurance Visit 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 type="checkbox"/> RCRA information	<input checked="" type="checkbox"/> Process/Flow/Pretreatment Schematics
<input checked="" type="checkbox"/> IU sampling procedures	<input checked="" type="checkbox"/> Flow/pH Meter(s)	<input type="checkbox"/> Calibration Records
<input checked="" 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: No documentation of a toxic organic management plan could be produced. Facility is certifying they're following one that's been submitted. This office has no record of one either.

Process Area(s): Could be cleaned up somewhat to reduce tripping hazards. Evidence of some spilled fluids covered up with "oil sorb".

Pretreatment System: Adequate, no comment.

Self Monitoring Procedures: Under the current plumbing situation, the "flume" into which all the regulated wastewater is discharged into and sump pumped out of, is adequate although a build-up of sediments on the bottom of the "flume" could cause some contamination problems during sampling. This auditor's sampler (a short "sludge judge") came into contact with the bottom of this flume while sampling and there was a visible brownish-red "sludge" that adhered to the bottom of the sampler. TSS (no limits for) may be contaminated by the settled solids on the bottom of the trough.

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 above discussion under "Self Monitoring Procedures".

Chemical Storage:

## II. Pre-Inspection Meeting

### A. General Information

Date and Time Inspection Started: 11/18/09 @ 9:15 a.m.		SIC code(s): 3471	
IU Reps/Titles: Brian Niswonger / Production Manager or Owner (Bill Niswonger, the owner was ("in and out", but didn't sit in on the entire inspection.)		Control Authority 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? "As needed"			
<b>Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></b>			
If No, explain: Facility is currently certifying to a toxic organic management plan (TOMP) and not monitoring for TTOs. There is no TOMP on file, but facility rep was given guidance and examples of a couple simple ones. Facility had no large quantities of toxic organics that could enter the sewer system in toxic amounts.			
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 work they're conducting. Sampling personnel need to be cognizant of various pipes and tubing in the area. Footing could be a problem if the area near the sump "flume" was wet or oily (which it wasn't during this visit).			
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: In the building where the black oxide, Zn phosphatizing and pretreatment system was, one needs to watch for tripping hazards. Main walkway was wooden pallets, but there was some piping at ground level that might be a trip hazard. Safety glasses are required around process tanks.			
<b>Has there been any changes since the last inspection regarding the following items:</b>			
Plant/flow/process layout? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Basic schematic now on file.			
Processes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: Facility added a Zn plating line back in mid '06			
Production Levels? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: Production increased back in early '08.			
Raw materials? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: Added Zn plating with tri-chrome			
Flow rates? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain: Flows have actually 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 checked="" type="checkbox"/> N/A <input type="checkbox"/>			
If Yes, was the CWF used to calculate limits? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
Prior to connection to the POTW sanitary sewer? yes <input checked="" type="checkbox"/> no <input type="checkbox"/> N/A <input type="checkbox"/>			
At connection to sanitary sewer? yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			



**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 the Zn plating (Bldg #2), Zn phosphating and one for the black oxide (Bldg #1).

Zn phosphatizing consists of 9 tanks where workpieces are Zn phosphatized, fresh water rinsed, alkaline cleaned/rinsed, muriatic acid washed/rinsed and sent through a hot wax-oil finish tank, then set out to cool

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, Zn phosphatized/fresh water rinsed and again dipped in a "wax oil" tank. Parts are then taken out of the wax-oil tank and allowed to cool. Wax is re-used.

Not necessarily in parts movement order, the Zn plating line consists of 14 tanks starting with a soak alkaline cleaner bath, an electric alkaline cleaner, soap rinse, 29% muriatic acid bath, water rinse, Zn plating bath/rinse, nitric acid rinse, clear tri-valent chrome bath/rinse, yellow tri-valent chrome bath, hot water rinse with a final hot alkaline bath sealer. Any wastewater from this operation is collected in a sump then pumped over into building 1's catch basin. All tanks are labeled, 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 first treatment pit. Cleaners and rinses are heated as well as the plating tank (when necessary). The plating tank is also in-line filtered with paper disks to remove Fe. Diatomaceous earth is also used as a filter aid in this unit.

General observations of facility's indoor housekeeping: Zn phos, black oxide and pretreatment equipment were in a crowded smaller building. There were some small oily or wet areas noted with "oil-dry" on them. Zn plating, being a newer installed process was housed in a much roomier, cleaner and orderly building.

General observations of area outside facility's building: Uncluttered with no chemical storage, raw material or chemicals stored. There were only a few empty drums and some wooden pallets.

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	<input type="checkbox"/> Equip. Cleanup	<input type="checkbox"/> Floor Cleanup	<input checked="" type="checkbox"/> Spent Bath Solutions Batch discharged at 100 to 200 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	<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 <sup>-</sup>	<input checked="" type="checkbox"/> Metals (List) All 40 CFR 433 metals	<input checked="" type="checkbox"/> Solvents: All CFR 433 TTOs although they've been erroneously certifying without a TOMP
<input type="checkbox"/> TSS	<input type="checkbox"/> Cl <sub>2</sub>	<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:  
But, the 4" drain is plugged.

**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"/> But, could probably do more.	
Environmental Management System in place? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
ISO Certified? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Currently working on ISO 9001	
Written Standard Operating Procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explain: They do have detailed "operation" sheets for different customer parts.	
Preventative Maintenance Program Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (hydraulic systems, valves, pumps, etc) Explain:	
Water Reuse: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explain: They do practice counter-current flow in one section of their Zn plating line.	
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: With unknown, unanticipated customer orders, this system would not be possible.	
Employee Training: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explain: "On-site, as needed".	
Spent Solvent Reclamation? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> None on location Explain:	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Explain: Pallets and newspaper	
Recycle Waste Oil, Solvents, and Lubricants? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Any waste oil from their disk oil skimmers is collected in an elevated poly tank for use in their own building heater. Explain:	
Other Activities:	
P2 Equipment/Practices in use:	
<input checked="" type="checkbox"/> In-process bath filtration on Zn plating line	<input type="checkbox"/> Aqueous Cleaning Solutions
<input type="checkbox"/> Fog Spray Rinsing	<input checked="" type="checkbox"/> Countercurrent Flow Rinsing
<input type="checkbox"/> Dragout Collection Trays	<input type="checkbox"/> Seal-Less Pumps
<input type="checkbox"/> Air Jets to Blow Parts Dry	<input type="checkbox"/> Secondary Containment of Process Solutions
<input type="checkbox"/> Aqueous Paint Stripping Solutions	<input type="checkbox"/> Bead Blasting to Remove Paint
<input type="checkbox"/> Water Soluble Cutting Fluids	<input type="checkbox"/> Recycle Overspray
<input type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input type="checkbox"/> Conductivity Meters
<input type="checkbox"/> Dead Rinse Tanks	<input type="checkbox"/>



**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 type="checkbox"/> Centrifugation	<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 building #2. All w.w. from that operation is collected in its own "catch pit". Its contents are pumped to building #1's concrete floor sump where it is pH adjusted and floc agents mixed. Then the w.w. is sent to a 3,000 equalization tank and is fed (~15 gpm) into an inclined plate clarifier where floc settles, then to a sludge thickening tank then metered into the sludge press about once or twice per day. Filter bags (parachute material) can be used in case of a sludge press malfunction. Supernatant from the clarifier and from the filter press is sent to drainage trough and pumped to the City.

As mentioned previously, the clarifier and its piping is in the same small building (#1) as the black oxide and Zn phosphating tanks with not much room to move freely about, but all appeared in working order with no visible rusting or leaky valves or piping. All the Zn phosphatizing and black oxide tanks are steel. Both these lines were down on the day of visit.

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

Could be in more detail, but adequate.

System Operator(s) Name: Brian Niswonger, Jim Duncan, "TJ" and Doug Cooley

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

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

Volume of discharge: ~ 4,000 gpd

Describe process from which batch originated (spent bath, e.g.): As mentioned above, only infrequently does the facility batch discharge their spent bath and rinse tanks.

Approximate duration of batch discharge: less than an hr. for 100 to 300 gallon batch.

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)?     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. 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?     Yes     No     N/A

Were any new MSDS reviewed during the Inspection?     Yes     No     N/A

If yes, list below:


Chemical storage comments:


Chemical handling procedures (totes, dolly, buckets, hardline, etc):

All the above except for hardline.


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

Does the facility have a Spill/Slug control plan?	<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 type="checkbox"/> N/A	
<b>Visual Inspection of Discharge Lines/Points</b>	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point: Sampling point, being at the end of a ~ 15' X 1' X 4'deep, sloped, "polyfill" lined floor trough which appeared to be open to contamination. Sump pump to City and sampling point is on the North end of the trough.	
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: Sump is connected to a hose which is PVC fitted to iron connected into a hose which in turn is connected to the City collection system.	

**Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements**

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.

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?  Yes  No  N/A

If no, record the name and address of Contract Lab: American Interplex

Automatic Sampler  or Manual

IU Self-Monitoring Results reviewed: the one IU reviewed was included with the facility's 10/09 semi-annual report  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 although no TOMP in 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: Facility rep is currently working on one.

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: It's 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 will reflect this.

# Arkansas Department of Environmental Quality

5301 Northshore Drive  
North Little Rock, AR 72118

## - CERTIFICATE OF ANALYSIS -

Our Lab#: 2009-3086

Sample ID: Industrial Metal Finishing - Sump

Sample Collect Date: 11/18/2009

Sample Grab #1

Report Date: 12/1/2009

Type:

<u>Test Group</u>	<u>Test</u>	<u>Result</u>	<u>Units</u>	<u>Analysis Date</u>	<u>MDL</u>	<u>RDL</u>
ICP/MS-T	Aluminum	20.3	µg/L	11/25/2009	20	20.0
	Antimony	< 10.0	µg/L	11/25/2009	5	10.0
	Arsenic	< 1.00	µg/L	11/25/2009	0.5	1.00
	Barium	75.4	µg/L	11/25/2009	2	10.0
	Beryllium	< 0.50	µg/L	11/25/2009	0.1	0.50
	Boron	6850	µg/L	11/25/2009	5	25.0
	Cadmium	10.7	µg/L	11/25/2009	0.3	1.00
	Calcium	33.4	mg/L	11/25/2009	0.04	0.040
	Chromium	66.6	µg/L	11/25/2009	0.3	1.00
	Cobalt	25.7	µg/L	11/25/2009	0.5	1.00
	Copper	6.05	µg/L	11/25/2009	0.5	1.00
	Iron	552	µg/L	11/25/2009	10	20.0
	Lead	1.73	µg/L	11/25/2009	0.1	1.00
	Magnesium	6.74	mg/L	11/25/2009	0.1	0.10
	Manganese	10.1	µg/L	11/25/2009	0.2	1.00
	Nickel	< 2.50	µg/L	11/25/2009	0.5	2.50
	Potassium	328	mg/L	11/25/2009	0.05	0.100
	Selenium	3.66	µg/L	11/25/2009	0.5	2.00
	Silicon Dioxide	13.8	mg/L	11/25/2009	0.02	0.20
	Silver	< 5.00	µg/L	11/25/2009	1	5.00
	Sodium	298	mg/L	11/25/2009	0.02	0.040
	Thallium	< 2.50	µg/L	11/25/2009	0.5	2.50
	Vanadium	< 2.50	µg/L	11/25/2009	1	2.50
	Zinc	1190	µg/L	11/25/2009	2	3.00

(1.19 mg/l)

## Arkansas Department of Environmental Quality

5301 Northshore Drive  
North Little Rock, AR 72118

## - CERTIFICATE OF ANALYSIS -

Our Lab#: 2009-3087

Sample ID: Industrial Metal Finishing - Sump

Sample Collect Date: 11/18/2009

Sample Grab #2  
Type:

Report Date: 12/1/2009

<u>Test Group</u>	<u>Test</u>	<u>Result</u>	<u>Units</u>	<u>Analysis Date</u>	<u>MDL</u>	<u>RDL</u>
ICP/MS-T	Aluminum	21.8	µg/L	11/25/2009	20	20.0
	Antimony	< 10.0	µg/L	11/25/2009	5	10.0
	Arsenic	1.12	µg/L	11/25/2009	0.5	1.00
	Barium	76.7	µg/L	11/25/2009	2	10.0
	Beryllium	< 0.50	µg/L	11/25/2009	0.1	0.50
	Boron	6820	µg/L	11/25/2009	5	25.0
	Cadmium	19.5	µg/L	11/25/2009	0.3	1.00
	Calcium	32.3	mg/L	11/25/2009	0.04	0.040
	Chromium	112	µg/L	11/25/2009	0.3	1.00
	Cobalt	45.6	µg/L	11/25/2009	0.5	1.00
	Copper	7.48	µg/L	11/25/2009	0.5	1.00
	Iron	978	µg/L	11/25/2009	10	20.0
	Lead	3.37	µg/L	11/25/2009	0.1	1.00
	Magnesium	6.53	mg/L	11/25/2009	0.1	0.10
	Manganese	16.0	µg/L	11/25/2009	0.2	1.00
	Nickel	< 2.50	µg/L	11/25/2009	0.5	2.50
	Potassium	316	mg/L	11/25/2009	0.05	0.100
	Selenium	4.71	µg/L	11/25/2009	0.5	2.00
	Silicon Dioxide	17.1	mg/L	11/25/2009	0.02	0.20
	Silver	< 5.00	µg/L	11/25/2009	1	5.00
	Sodium	314	mg/L	11/25/2009	0.02	0.040
	Thallium	< 2.50	µg/L	11/25/2009	0.5	2.50
	Vanadium	< 2.50	µg/L	11/25/2009	1	2.50
	Zinc	3140	µg/L	11/25/2009	2	3.00

(3.14 mg/l)

# Arkansas Department of Environmental Quality

5301 Northshore Drive  
North Little Rock, AR 72118

## - CERTIFICATE OF ANALYSIS -

Our Lab#: 2009-3088

Sample ID: Industrial Metal Finishing - Sump

Sample Collect Date: 11/18/2009

Sample Grab #3  
Type:

Report Date: 12/1/2009

<u>Test Group</u>	<u>Test</u>	<u>Result</u>	<u>Units</u>	<u>Analysis Date</u>	<u>MDL</u>	<u>RDL</u>
ICP/MS-T						
	Aluminum	43.1	µg/L	11/25/2009	20	20.0
	Antimony	10.3	µg/L	11/25/2009	5	10.0
	Arsenic	2.93	µg/L	11/25/2009	0.5	1.00
	Barium	74.3	µg/L	11/25/2009	2	10.0
	Beryllium	< 0.50	µg/L	11/25/2009	0.1	0.50
	Boron	6630	µg/L	11/25/2009	5	25.0
	Cadmium	30.9	µg/L	11/25/2009	0.3	1.00
	Calcium	31.6	mg/L	11/25/2009	0.04	0.040
	Chromium	410	µg/L	11/25/2009	0.3	1.00
	Cobalt	180	µg/L	11/25/2009	0.5	1.00
	Copper	11.1	µg/L	11/25/2009	0.5	1.00
	Iron	2660	µg/L	11/25/2009	10	20.0
	Lead	11.2	µg/L	11/25/2009	0.1	1.00
	Magnesium	5.42	mg/L	11/25/2009	0.1	0.10
	Manganese	41.3	µg/L	11/25/2009	0.2	1.00
	Nickel	3.96	µg/L	11/25/2009	0.5	2.50
	Potassium	237	mg/L	11/25/2009	0.05	0.100
	Selenium	10.5	µg/L	11/25/2009	0.5	2.00
	Silicon Dioxide	33.0	mg/L	11/25/2009	0.02	0.20
	Silver	< 5.00	µg/L	11/25/2009	1	5.00
	Sodium	354	mg/L	11/25/2009	0.02	0.040
	Thallium	< 2.50	µg/L	11/25/2009	0.5	2.50
	Vanadium	< 2.50	µg/L	11/25/2009	1	2.50
	Zinc	9810	µg/L	11/25/2009	2	3.00
		<i>(9.81 mg/L)</i>				