#1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

APR 28 2015

CERTIFIED MAIL 7014 2870 0000 3318 0172
RETURN RECEIPT REQUESTED

City of Hollywood
Attn: Mr. Steve Joseph, P.E.
Director, Department of Public Utilities
P.O. Box 229045
Hollywood, Florida 33022-9045

Re: Notice of Violation and Opportunity to Show Cause
National Pollutant Discharge Elimination System Permit No.: FL0026255
City of Hollywood Southern Regional Wastewater Treatment Plant

Dear Mr. Joseph:

The purpose of this letter is to advise the City of Hollywood (City) that the United States Environmental Protection Agency Region 4 has reviewed information submitted by the City to the EPA on October 17, 2014 in response to the EPA's information request letter issued pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318. In addition, on February 10, 2015, the EPA and the Florida Department of Environmental Protection conducted a Compliance Evaluation Inspection (CEI) of the City's Wastewater Collection and Transmission System (WCTS). The City subsequently submitted examples of building backups via email on February 12, 2015. A copy of the CEI report is enclosed.

Based upon review of the information submitted and the CEI, the EPA has determined that the City has violated the CWA and its National Pollutant Discharge Elimination System (NPDES) permit as follows:

> During the period of January 12, 2010, through December 31, 2014, the City had three Sanitary Sewer Overflows (SSOs) totaling at least 14,048,500 gallons of untreated sewage that discharged from the City's WCTS to navigable waters of the United States as defined by Section 502 of the CWA, 33 U.S.C. § 1362. Such SSOs were not authorized by the NPDES permit and are therefore violations of Section 301(a) of the CWA, 33 U.S.C. § 1311(a). In addition, the City had at least an additional 31 SSOs totaling at least 109,000 gallons of untreated sewage that was released from the WCTS and that did not reach navigable waters of the United States. All 34 SSOs are indicative of the City's violation of Section IX.7. of the City's NPDES Permit No.: FL0026255, which requires the City to properly operate and maintain its facility. In addition, it appears the City has violated Sections I.A.12., VIII.4. and/or IX.20. by failing to report SSOs to the State of Florida and/or violated Section 308 of the CWA by failing to report at least 1 SSO to the EPA in response to the EPA information request, issued pursuant to Section 308 of the CWA, 33 U.S.C. § 1318.

Until compliance with the CWA is achieved, the City is considered to be in violation of the CWA and subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

Therefore, the EPA requests that representatives of the City contact the EPA within seven business days of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against the City for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. The City should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial information, which may reflect an inability to pay a penalty. The City has the right to be represented by legal counsel.

Please be aware that the EPA may use information provided during the meeting or telephone conference in any enforcement proceeding related to this matter. Failure to schedule a show cause meeting may result in a unilateral enforcement action against the City. Notwithstanding the scheduling of a show cause meeting, the EPA retains the right to bring further enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

Please contact Mr. Brad Ammons, of my staff, at (404) 562-9769 or by email at ammons.brad@epa.gov to arrange a show cause meeting. If you have any questions regarding this Notice of Violation, please contact Mr. Ammons. Legal inquiries should be directed to Mr. Bill Bush, Associate Regional Counsel, at (404) 562-9538.

Sincerely,

for James D. Giattina
Director
Water Protection Division

cc: Ms. Jessica Kleinfelter
Florida Department of Environmental Protection

Ms. Diane Pupa
Florida Department of Environmental Protection, West Palm Beach

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4
Water Protection Division
NPDES Permitting & Enforcement Branch

COMPLIANCE EVALUATION INSPECTION REPORT

City of Hollywood Public Utilities Department
Broward County
Florida
NPDES Permit No. FL0026255

Facility Address:
1621 North 14th Avenue
Hollywood, Florida 33022

Inspection Dates:
February 10, 2015

Inspectors:
Brad Ammons, Enforcement Officer, EPA Region 4
Konstantin Dubov, Environmental Specialist II, FDEP
Diane Pupa, Environmental Administrator, FDEP

Inspection Report Prepared by:
Brad Ammons, EPA Region 4

April 14, 2015

TABLE OF CONTENTS

Contents

I. OVERVIEW 1

II. OBJECTIVES 1

III. INVESTIGATION METHODS 1

IV. REGULATORY SUMMARY 2

V. INSPECTION SUMMARY AND FINDINGS 2

A. Analysis of SSOs 2

B. Management Interview 3

C. Site Inspection 3

VI. **Recommendations and Conclusion** 5

A. Recommendations 5

a. Root Control Program 6

b. FOG Control Program 6

c. Operations, Preventive Maintenance, Assessment and Rehabilitation Programs 7

d. Sewer Overflow Response Plan (SORP) 10

B. Conclusion 13

ABBREVIATIONS AND ACRONYMS

CEI	Compliance Enforcement Inspection
CMOM	Capacity, Management, Operation, and Maintenance
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	United States Environmental Protection Agency
FDEP	Florida Department of Environmental Protection
FOG	Fats Oils and Grease
GIS	Geographic Information System
GPM	Gallons per Minute
I/I	Infiltration and Inflow
ICIS	Integrated Compliance Information System
MGD	Million Gallons per Day
MOM	Management, Operation, and Maintenance
NPDES	National Pollutant Discharge Elimination System
POTW	Publicly Owned Treatment Works
PS	Pump Station
RDII	Rain Derived Infiltration and Inflow
SORP	Sewer Overflow Response Plan
SSES	Sanitary Sewer Evaluation Survey
SSO	Sanitary Sewer Overflow
WCTS	Wastewater Collection and Transmission System
WWTP	Wastewater Treatment Plant

I. OVERVIEW

The City of Hollywood's (the City) Public Utilities Department provides sanitary sewer services to approximately 21,150 residential customer accounts in the City of Hollywood, Florida. The service area is considerably larger than the City boundaries given the fact that the City's Southern Regional Wastewater Treatment Plant (WWTP) serves as the regional WWTP for:

- the City of Hollywood,
- the City of Dania Beach,
- the City of Hallandale Beach,
- the City of Pembroke Pines,
- the City of Pembroke Park, and,
- Portions of the unincorporated areas of Broward County.

The five (5) "satellite systems" outside the City of Hollywood serve approximately 37,000 sewer customer accounts. Thus, the City's South Regional WWTP serves approximately 58,150 total sewer customer accounts. The City is responsible for 321.5 miles of gravity sewer and force main, 74 Pump Stations (PS) and the Southern Regional WWTP with a design flow of 55.5 Million Gallons per day (MGD) and an average flow of approximately 38 MGD.

The EPA and Florida Department of Environmental Protection (FDEP) conducted a Compliance Evaluation Inspection (CEI) of the City's wastewater collection and transmission system (WCTS) on February 10, 2015. The purpose of this CEI was to evaluate compliance with the Clean Water Act (CWA) as it relates to Sanitary Sewer Overflows (SSOs) from the WCTS and to assess the City's MOM programs. Additionally, this CEI was intended to examine the causes and potential corrective actions for SSOs from the WCTS.

During the inspection, the EPA requested written documentation of any MOM programs that the City may use to operate and maintain its WCTS. The EPA also discussed inspection and maintenance records, interviewed management personnel and visited various sites in the WCTS, including PS numbers W-27, A-9, A-10, W-9 and W-10. This report describes the EPA's findings, identifies areas that need to be addressed and presents preliminary recommendations.

II. OBJECTIVES

The specific objectives of the CEI were to assess the City's compliance with the CWA, evaluate reported SSOs, assess the City's MOM programs, where implemented, and to examine the causes of SSOs in the WCTS.

III. INVESTIGATION METHODS

The investigation included:

- Review of the Integrated Compliance Information System - National Pollutant Discharge Elimination System (ICIS-NPDES) federal database and state documents;
- Review of the NPDES permit and related documents;
- Review City's proposed SSO corrective projects, if any;
- Interviews with the City's Public Utilities Department personnel; and,

- Visual inspection.

IV. REGULATORY SUMMARY

The FDEP is authorized under the CWA to implement the NPDES program in the State of Florida. As a part of this implementation, FDEP provides oversight of the efficacy of operation and maintenance of the WCTS associated with all NPDES permits. The regional WWTP operated by the City is authorized by FDEP under NPDES permit No. FL0026255 to discharge treated effluent into the Atlantic Ocean. The NPDES permit was issued on August 30, 2012 and expires on August 29, 2017.

SSOs that impact waters of the U.S. are prohibited based on Sections 301 and 402 of the CWA which generally prohibits the discharge of pollutants by any person unless authorized by an NPDES permit. Section IX.5. of the City's NPDES permit requires the permittee to minimize or prevent discharges which has a reasonable likelihood of adversely affecting human health or the environment. Section IX.7. of the City's NPDES permit requires that the permittee shall at all times properly operate and maintain the facility and systems of treatment and control and related appurtenances that are installed and used by the permittee to achieve compliance with the conditions of the permit. The WCTS is included in the "related appurtenances" that the NPDES permit mentions.

V. INSPECTION SUMMARY AND FINDINGS

The EPA performed a pre-inspection evaluation and an on-site CEI of the City's WCTS. The pre-inspection evaluation of the City's WCTS consisted of examining records submitted by the facility to FDEP and/or the EPA as well as a review of the information the City submitted in response to the EPA's CWA Section 308 information request. This section will provide a summary of both means of evaluation as well as any recommendations to the City to improve the WCTS performance.

A. Analysis of SSOs

Discharges to waters of the United States from sanitary sewer systems are prohibited unless authorized by an NPDES permit. In addition, overflows from the sewer system that do not reach waters of the United States can be indicative of a failure to comply with the proper operation and maintenance provisions of Section IX.7. of the City's NPDES permit.

The City owns and operates the Southern Regional WWTP that treats all the wastewater produced in the City, 4 other cities, and unincorporated portions of Broward County. A close look at the SSO data submitted to FDEP by the City revealed discrepancies in the number and volume of the SSOs reported in the City's response to the EPA's information request. Specifically, FDEP has record of SSOs that occurred on November 2, 2009 and September 18, 2011; however, these two (2) SSOs were not reported to the EPA in response to the EPA's information request.

The City had a major SSO on November 16 – 18, 2011 that resulted in over 20 million gallons released to the C-10 Canal. In addition, the City experienced two (2) other large SSOs on August 31, 2011 (100,000 gallons to storm drains) and July 18, 2014 (48,000 gallons). The August and November 2011 large SSOs were due to City contractors and the July 2014 large SSO was due to a

10" force main rupture. The City response to the EPA's information request listed a total of 9 SSOs that amounted to an annual average of 0.56 SSOs per year per 100 miles of sewer. However, the average volume of SSO per year per 100 miles of sewer (1,253,972 gallons) is significantly above what is typically found in other municipalities of comparable size and does not include the two (2) other SSOs that FDEP has record of.

B. Management Interview

The EPA and FDEP met with representatives of the City on February 10, 2015, at the Southern Regional WWTP. Topics of discussion during the meeting included the use and documentation of any MOM programs including Building backups, capacity limited portions of the WCTS, Inter-Jurisdictional Agreements, Fats, Oil, and Grease (FOG) Control, Root Control, Preventive Maintenance and Inspections, Pump Station Back-up Power, Infiltration/Inflow reduction, the City's Pretreatment program, water quality monitoring for SSO impacts and reporting procedures. The EPA discussed concerns relating to the large SSOs listed above with the representatives and inquired about each program listed above to determine whether a formal or non-formal (not in writing) program existed to manage various maintenance and operations needs of the WCTS. While the City claims to have a written MOM Program, a copy was not provided to the EPA.

A review of the SSO data submitted to FDEP, the CWA Section 308 response submitted, combined with this CEI, forms the basis for the recommendations and conclusion outlined in this report. In general, the City has a few written operating procedures for some of the MOM programs that the EPA recommends, however, improvements are needed in several program areas.

C. Site Inspection

The EPA performed an on-site inspection of various points in the WCTS. Several sites were chosen based on the status of upgrades to the pump station that was visited. The EPA and FDEP inspected the following pump stations: (1) pump station #W-27; (2) pump station #A-9; (3) pump station #A-10; (4) pump station #W-9 and (5) pump station #W-10, as well as the site of the 48" force main rupture that discharged approximately 20 million gallons in November 2011.

Pump station #W-27 is the pump station that pumps into the 48" force main that ruptured and caused the largest volume SSO in November 2011. Pump station #A-9 is in the middle of being upgraded from a can station to a new wet well with submersible pumps. Pump station #A-10 is similar to #A-9, but was upgraded using the existing wet well with newly upgraded electrical controls. Pump station #W-9 is a new pump station that was not in operation at the time of this inspection. Finally, pump station #W-10 is also a new pump station serving the western portion of the City close to the city corporate limits but is receiving minimal flow due to lack of sewers in the area.

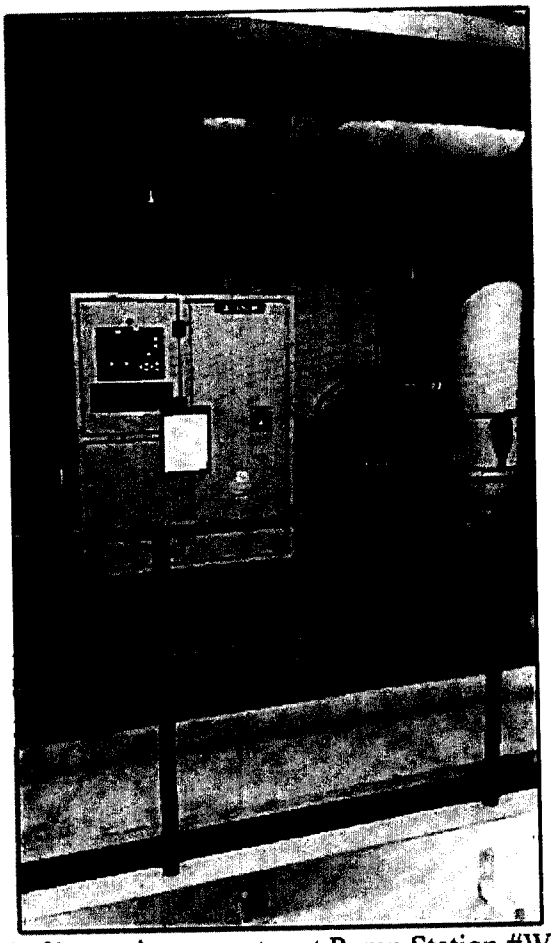
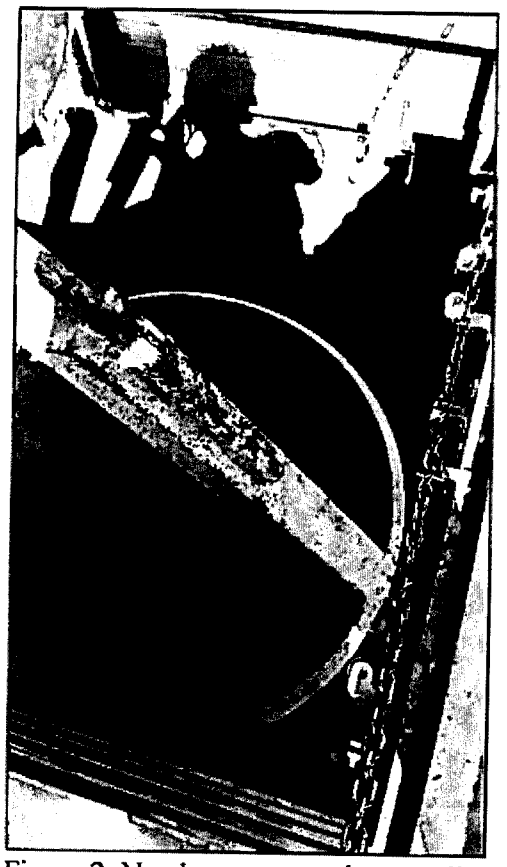


Figure 1: Three pump motors at Pump Station #W-27 (Left); on-site generator at Pump Station #W-27 (Right).



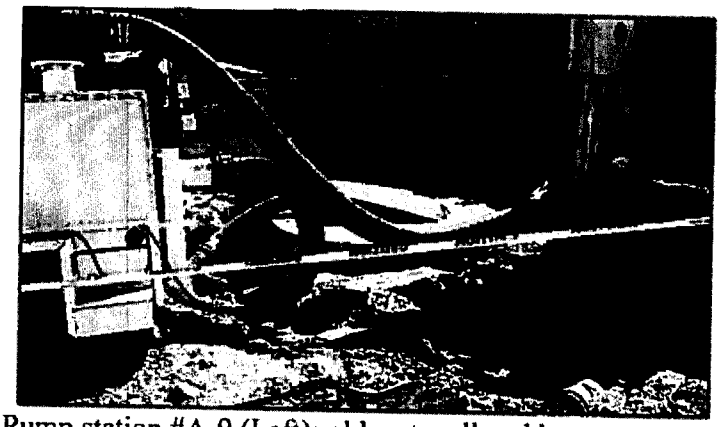
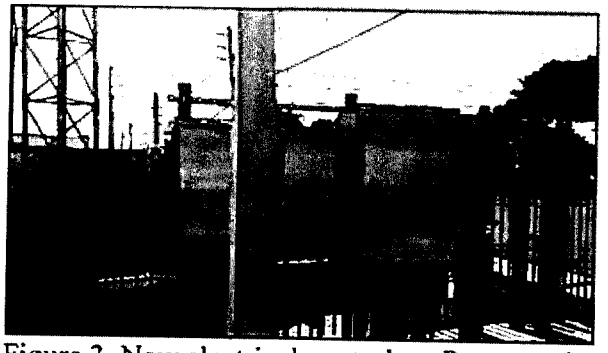


Figure 2. Newly constructed wet well for Pump station #A-9 (Left); old wet well and bypass pump for Pump Station #A-9 (Right).



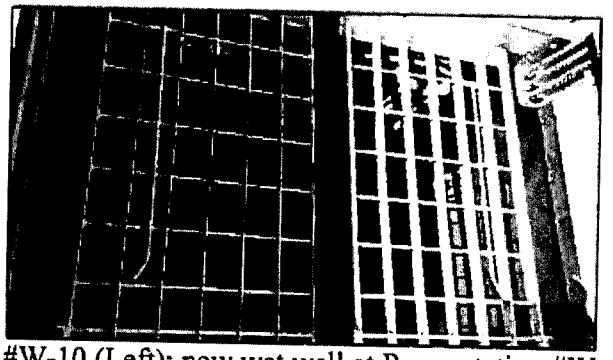


Figure 3. New electrical controls at Pump station #W-10 (Left); new wet well at Pump station #W-10 (Note high water level in wet well; pumps would not come on during visit; the City later told the EPA and FDEP that this was mostly rainwater from an industrial area nearby where the industries lift manhole covers to drain their parking lots).

VI. Recommendations and Conclusion

A. Recommendations

The EPA noted several preventive maintenance procedures the City is utilizing that are in keeping

with best management practices to operate and maintain the system; however, the EPA recommends that City develop formal written programs (or expand if formal, written programs have already been developed) for these preventive maintenance procedures and programs. Developing formal written programs will aid in refining these programs, which should increase efficiency of the programs and provide guidance for the implementation of these programs that can be passed down to the next maintenance generation. Specifically, the City has already begun implementing a WCTS-wide assessment and rehabilitation program and has begun upgrading the City's sewer pump stations, as noted above.

MOM program development guidance documents can be found on EPA, Region 4's website at http://www.epa.gov/region4/water/wpeb/momproject/.

Recommended MOM programs include, but are not limited to:

a. Root Control Program

The City does not currently use chemical root control. Root intrusion is mainly controlled by cutting (mechanical) and rodding during cleaning. From the information provided by the City via email after the CEI, the City has experienced at least one (1) building backup SSOs due to roots in the public laterals and mainlines. However, there are likely more building backups caused by roots because the City's work orders often say "cleared blockage" in the City's WCTS to relieve a building backup without specifying what caused the blockage (e.g. roots, grease, debris, sand, etc.).

The EPA recommends that the City develop and implement a formal Root Control Program. The Root Control Program should include documents that outline procedures and provide guidance on how to manage and reduce root growth and intrusion into the WCTS. In developing this program, the City should consider the various best practices currently being used to manage root intrusion.

b. FOG Control Program

In general, there was very little noticeable FOG in the pump station wet wells of the pump stations visited by the EPA and FDEP during this CEI. However, in the building backup information provided, several building backups were attributed to grease, while it was unknown what caused the blockages in many other building backups, as the City's info only states "blockage cleared" without detailing what caused the blockage (e.g. roots, debris, FOG, sand, etc.).

The EPA recommends that the City develop and implement a formal FOG Control Program. The FOG Control Program should include, but not be limited to, the following criteria:

i. The legal authority to control the discharge of FOG into the WCTS, including the ability to implement a permit and enforcement program.

ii. Specification of accepted devices to control the discharge of FOG into the WCTS.

iii. Establishment of standards for the design and construction of FOG control devices including standards for capacity and accessibility, site map, design documents, and as-built drawings.

iv. Establishment of FOG control device management, operations, and maintenance standards, or best management practices, that address onsite record keeping requirements, cleaning frequency, cleaning standards, use of additives, and ultimate disposal.

v. Establishment of construction inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements, to assure that FOG control devices are constructed in accordance with established design and construction standards.

vi. Establishment of compliance inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements to assure that FOG control devices are being managed, operated, and maintained in accordance with the established management, operations, and maintenance standards or best management practices.

vii. Establishment of a FOG disposal manifest system.

viii. Establishment of an enforcement program, including specific enforcement mechanisms, to ensure compliance with the FOG Control Program.

ix. Establishment of a compliance assistance program to facilitate training of FOG generators and their employees.

x. Establishment of a public education program directed at reducing the amount of FOG entering the WCTS from private residences.

xi. Establishment of staffing (technical and legal) and equipment requirements to ensure effective implementation of the FOG Control Program.

xii. A FOG characterization study that shall identify the sources of FOG causing problems in the WCTS and the best method or mechanism for addressing those sources.

xiii. A list of current commercial establishment FOG generators including a description of their FOG generating processes and average daily discharge volume.

xiv. Establishment of performance indicators to be used by the City to measure the effectiveness of the FOG Control Program.

c. Operations, Preventive Maintenance, Assessment and Rehabilitation Programs

The EPA recommends that the City develop and implement formal written MOM Programs with an aggressive Preventive Maintenance and Inspection Program that defines goals for cleaning and inspection activities and pump station preventive maintenance activity,

including:

A **Gravity Line Preventive Maintenance Program**. The City claims to have a schedule for cleaning the WCTS. However, according to the City's work orders provided via email after this CEI, it appears that a lot of the gravity line sewer cleaning the City conducts is in a reactive mode. In addition, the City's work orders provided at least one (1) occurrence of a broken sewer line.

Therefore, the EPA recommends that the City develop and implement a formal Gravity Line Preventive Maintenance Program. The Gravity Line Preventive Maintenance Program should include the following components: 1) blockage abatement mechanisms (including both hydraulic and mechanical cleaning), 2) root control mechanisms (including hydraulic and mechanical cleaning, as well as consideration of the use of chemical root control agents), 3) debris control mechanisms, and 4) manhole preventive maintenance procedures. This program should include the following activities: 1) identification of, and provision for, all personnel and equipment needed, 2) determination of the frequency, 3) establishment of procedures, 4) establishment of priorities for scheduling, 5) the use of standard forms, 6) establishment of record keeping requirements, 7) establishment of performance measures, and 8) integration of all data collected under the program with other information management systems.

A **Continuing Sewer System Assessment Program**. The City verbally described which areas of the WCTS have already been assessed for rehabilitation or replacement needs. The City has made a lot of progress in assessing the gravity sewers in the City's WCTS in recent years and has a general plan for continuing its assessment program. However, there was no formal written Continuing Sewer System Assessment Program (CSSAP) document provided or shown to the EPA; nor was there any discussion of assessment of force mains within the City's WCTS.

Therefore, the EPA recommends that the City develop and implement a formal CSSAP. The CSSAP should establish procedures for setting priorities and schedules for undertaking the WCTS assessment including: 1) corrosion defect identification, 2) routine manhole inspections, 3) flow monitoring, 4) CCTV activities, 5) gravity system defect analysis, 6) smoke testing, 7) force main defect analysis, and 8) pump station performance and adequacy analysis. The CSSAP should provide for the assessment of at least ten percent (10%) of the WCTS on average per year and establish priorities and schedules taking into consideration the nature and extent of customer complaints; flow monitoring; location and cause of SSOs and WCTS deficiencies; any remediation work already ongoing; pump station run times and/or pressures; field crew work orders; any preliminary sewer assessments, such as flow monitoring results; community input; and any other relevant information.

An **Infrastructure Rehabilitation Program**. The City provided maps of the WCTS and which areas of the WCTS have already been rehabilitated (color coded for which gravity sewers and manholes have been rehabilitated between 2006 and 2014 vs. those gravity sewers and manholes that were rehabilitated prior to 2005 or have not been rehabilitated at all). The City has made a lot of progress in rehabilitating the entire WCTS in recent

years and has a general plan for continuing its rehabilitation/replacement program, generally through its Capital Improvement budgeting process. The City management mentioned that the City had just signed a $7 million rehabilitation contract prior to this CEI. However, there was no formal written Infrastructure Rehabilitation Program (IRP) document provided or shown to the EPA. In addition, given the very large SSOs attributed to force main ruptures, the City should include rehabilitation of all assessed force mains within the City's WCTS.

Therefore, the EPA recommends that the City develop and implement a formal IRP. The IRP should establish procedures for setting priorities and schedules for undertaking rehabilitation of the WCTS. The IRP should address Infiltration/Inflow (I/I), structural issues in the WCTS, and the other conditions causing SSOs, with the goal of eliminating future SSOs. The IRP should take into account all previous information the City has gathered including any information gathered pursuant to the CSSAP. The IRP should also establish standard procedures to analyze the effectiveness of completed rehabilitation projects.

A **Pump Station Operations and Preventive Maintenance Program**. City management stated that the City's pump stations are inspected on a once per day to once per 2 week schedule, depending on the size and criticality of the pump station. In addition, most of the City's pump stations are monitored remotely via Supervisory Control and Data Acquisition (SCADA) systems. Nine (9) of the City's pump stations have on-site backup generators and the remaining pump stations all have dual-feed power supplies. The City also owns 40 portable generators in case of power loss at a City pump station. However, there was no formal written Pump Station Operations and Preventive Maintenance Program (PSOPMP) document provided or shown to the EPA.

Therefore, the EPA recommends that the City develop and implement a formal PSOPMP. The PSOPMP should include or address the following items/components described below:

i. Pump station operations at pump stations that are to be conducted on a routine, scheduled basis. The program should define the standard pump station operating procedures to be followed at each pump station such as reading and recording information from the elapsed time meters, recording information from the pump start counters, observing wet well conditions and grease accumulation, checking and re-setting, as necessary to improve system performance, wet well set points, checking and recording system pressure, checking SCADA (or equivalent system) components, checking alarms and stand-by power and identifying maintenance needs.

ii. Emergency pump station operations procedures. The program should address pump station operations at pump stations that are to be conducted as a result of equipment failure or loss of electrical power. The program should define the emergency pump station operating procedures to be followed at each pump station such as calling for emergency maintenance, initiating stand-by power by bringing in portable generators or initiating portable pump operations for pump around.

iii. The program should establish schedules, routes, priorities, standard forms and reporting procedures and establish minimum acceptable performance measures and condition grading criteria.

Preventive Maintenance and Inspection Programs can have a significant positive impact on the future condition of the City's WCTS. A properly implemented Preventive Maintenance, Inspection and Rehabilitation Program may prevent a massive outlay of expenses needed to repair or replace parts of the WCTS that City personnel 'did not see' failing due to the lack of prevention. Relatively small preventive maintenance expenses now can save the City larger repair or capital expenses in the future.

d. Sewer Overflow Response Plan (SORP)

According to documentation submitted by the City and FDEP to the EPA, it appears that the City has experienced at least 1 SSO that was not reported to the EPA under the information request response. Specifically, FDEP has record of a SSO that occurred on 9/18/2011 at the intersection of 29th Avenue and Fillmore Street due to a bypass pump failure. In addition, according to the information submitted via email, it appears that there was 1 SSO that occurred on 8/8/2012 at the intersection of Arizona Street and A1A that neither the EPA nor the FDEP have a record of. Finally, it appears that the City has experienced at least 21 building backups caused by conditions in the City's WCTS that all occurred during July-August 2012 or October – December 2014 according to the information provided by the City via email. Given this level of building backups over a five (5) month period, it is likely that the City experiences multiple building backups every month.

Therefore, the EPA recommends that the City revise and/or expand its SORP (dated April 2012) using the guidelines provided below that will establish timely and effective methods and means of responding to, cleaning up, and/or minimizing the impact of SSOs and building back-ups; establish procedures to timely report of the time, date, location, volume, cause, impact, and other pertinent information of all SSOs and building back-ups to the appropriate regulatory agency(ies); and notification methods to the potentially impacted public. The SORP should have the following components:

i. The SORP should provide procedures for orally reporting to FDEP the location of any SSO by street address or any other appropriate method (i.e., latitude-longitude) within twenty-four (24) hours of the time the City first becomes aware of the SSO.

ii. The SORP should provide procedures for written reporting to FDEP within five (5) days of the time the City first becomes aware of the SSO. At a minimum, a written report should contain the following:

a. Location of the SSO by street address, or any other appropriate method (i.e., latitude-longitude).

b. Estimated date and time when the SSO began and stopped, or if still active, the anticipated time to stop the SSO.

c. Steps taken to respond to the SSO.

d. Ultimate destination of the SSO, such surface waterbody (by name), if applicable, storm drain leading to surface waterbody (by name), dry land, building, etc.

e. An estimate of the volume (in gallons) of sewage discharged.

f. Description of the sewer system component from which the SSO was released (ie., manhole, crack in pipe, pump station wet well, etc...).

g. Estimate of the SSO's impact on public health and water quality in the receiving water body.

h. Cause or suspected cause of the SSO.

i. The date of the last SSO at the same location within the past five years.

j. Steps taken or to be taken to reduce, eliminate, and prevent recurrence of the SSO with a schedule of major milestones for those steps.

k. Report of all notifications to the public and other agencies or departments.

iii. The SORP should provide procedures for maintenance of records for at least five (5) years from the date of an SSO, including all written and/or electronic documents including but not limited to: written reports to FDEP; field crew notes, work orders, pictures, response times and corrective actions taken; records documenting steps that have been and will be taken to prevent the SSO from recurring, including work order records associated with investigation and repair activities; and a list and description of complaints from customers or others regarding an SSO.

iv. The SORP should establish procedures for identifying the cause of an SSO, for identifying the extent of potential threats to human health or the environment from the SSO, and for quantifying the volume and duration of the SSO.

v. The SORP should provide procedures for responding to SSOs in a timely manner to minimize the environmental impact and potential human health risk, and should include, but not be limited to, the following:

a. A detailed description of the procedures to immediately provide notice to the public that may be impacted by the SSO (through the local news media or other means including without limitation signs or barricades to restrict access).

b. A detailed description of the procedures for ensuring that the City is made aware of all SSOs as expeditiously as possible, and the responsibilities of employees (by position) charged with responding to SSOs.

c. A detailed description of the procedures to provide notice to appropriate local agencies/authorities.

d. A detailed description of the procedures (including response standard operating procedures) to minimize the volume of untreated wastewater discharged at an SSO location.

e. A detailed description of pump station-specific emergency procedures, bypass/ pump-around strategies, and estimated storage capacity (i.e., maximum volume of sewage that can be stored in the event of a pump station failure or repair without causing an SSO and estimated time during which sewage can be stored before an SSO will occur).

f. In the event that a repair may cause or lengthen the time of an SSO, a detailed procedure for determining when additional storage or pump around will be needed.

g. A detailed plan for cleaning up all SSOs completely and expeditiously.

h. A detailed plan describing the standard operating procedures to be followed by the City personnel in responding to building backups, including:

i. Methods for communicating with customers about how to report building backups and how to obtain clean-up.

ii. Response to building backups, including timeframe for responses, measures to be taken to clean up building backups caused by conditions in the City's WCTS, procedures to disinfect and/or remove potentially contaminated items (i.e. wet vacuuming, wiping floors and walls with disinfectant, flushing out and disinfecting plumbing fixtures, carpet cleaning or replacement), procedures to correct or repair conditions in the sewer system causing or contributing to the building backup, and the follow-up process to insure adequacy of cleanup.

iii. Resources to correct or repair the condition causing or contributing to the building backup.

iv. The process a customer may follow to dispute a determination by the City personnel that a wastewater backup into a building is caused by a blockage or other malfunction of a private lateral, and therefore is not a building backup.

vi. The SORP should provide procedures for providing adequate training necessary for the City employees, contractors, and personnel of other affected agencies to effectively implement the SORP. The SORP should provide training guidelines to ensure adequate response training is provided to management and field personnel responsible for responding to SSOs. The SORP should provide procedures for adequate training to response personnel for estimating volumes from SSOs.

vii. The City should establish procedures for remedying the cause of an SSO. Standard repairs for typical SSO causes should be identified, as should the resources needed and available for such repairs. Procedures for diverting flow around blockages or line failures should be included, as should procedures for minimizing human contact with sewage. Standard containment procedures for typical SSOs should be identified.

viii. The City should identify and include in the SORP a list of those SSO locations within the WCTS that have been recorded as overflowing more than once in a 12 month period and those locations at which an SSO is likely to occur first in the event of pump station failure for each pump station. The SORP should provide procedures for establishing routine inspection routes to be performed after each rain event. The inspection routes should include all SSO locations identified as having occurred more than once in a 12 month period, and all pump stations that are not monitored at a central location via remote monitoring devices.

ix. The City should ensure all SSOs are thoroughly documented and tracked by location, date, and volume.

B. Conclusion

The City's personnel appear knowledgeable about the operation and maintenance of the system; however, some of the deficiencies noted above are of concern. In particular, the City has had 3 large volume SSOs that are related to City contractors or a force main break. The City's control over its own contractors is a concern, as well as the beginning signs of aging infrastructure in force main breaks. In addition, there appears to be inconsistent reporting of SSOs to FDEP, as well as numerous building backups caused by conditions in the City's WCTS (21 building backups over a 5 month period). These deficiencies highlight the need for the development (or improvement) and implementation of formal written MOM programs as well as the completion of significant WCTS infrastructure capital improvements.

BLANK PAGE

#2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 28 2014

CERTIFIED MAIL 7010 1060 0002 1705 4037
RETURN RECEIPT REQUESTED

City of Laurel
Attn: The Honorable Johnny Magee
Mayor, City Hall
401 North 5th Avenue
Laurel, Mississippi 39440

Re: Information Request – Section 308 of the Clean Water Act
National Pollutant Discharge Elimination System Permit Nos.: MS0024163 and MS0020176
Laurel George Gady #1 and Laurel #2 Wastewater Treatment Plants

Dear Mayor Magee:

Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, the U.S. Environmental Protection Agency Region 4 hereby requests the City of Laurel (the City) to provide the information set forth in Enclosure A regarding the Wastewater Treatment Plants noted above and their associated sanitary sewer collection systems. The City is required to respond to this information request within 30 days of its receipt of this letter. The response should be directed to:

Mr. Dennis Sayre, Enforcement Officer
U.S. Environmental Protection Agency, Region 4
Clean Water Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

The City's response should specifically reference the particular section and number of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible City official in accordance with 40 C.F.R. § 122.22:

> "I certify under 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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the 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 knowing violations."

Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

The City shall preserve, until further notice, all records (either written or electronic), which exist at the time of receipt of this letter that relate to any of the matters set forth in this letter. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this information request shall include assurance that these record protection provisions were put in place as required. No such records shall be disposed of until written authorization is received from the Chief of the Clean Water Enforcement Branch at the U.S. EPA, Region 4.

If you believe that any of the requested information constitutes confidential business information, you may assert a confidentiality claim with respect to such information except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure B.

Also enclosed is a document entitled *U.S. EPA Small Business Resources-Information Sheet*, which may assist you in understanding the compliance assistance resources and tools available. However, any decision to seek compliance assistance at this time does not relieve the City of its obligations to the EPA or the State of Mississippi, does not create any new rights or defenses and will not affect the EPA's decision to pursue enforcement action.

Please contact Mr. Sayre at (404) 562-9756 or by email at sayre.dennis@epa.gov, if you have questions regarding this notice and information request.

Sincerely,

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division

Enclosures

cc: Mr. Chris Sanders
Mississippi Department of Environmental Quality

Director, Water Department
City of Laurel

Project Manager
United Water - Laurel

ENCLOSURE A

SSO PROGRAM
City of Laurel, MS

1. Provide the following:

   a. The size of the City's Sanitary Sewer Collection System (SSS) (linear feet or miles);
   b. A list of the pump stations in the SSS, including size (gpm), and indicate if back up power is available and if it is adequate to fully operate the pump station;
   c. A list of all constructed overflow points (any unpermitted constructed discharge points) in the SSS (including pump stations) prior to the headworks of the City's WWTPs;
   d. The average design flow of the City's WWTPs;
   e. The peak design flow of the City's WWTPs;
   f. The annual average flow of the City's WWTPs; and
   g. The population served by the City's WWTPs and their respective SSSs.

2. For purposes of this Information Request, a sanitary sewer overflow (SSO) is an overflow, spill, release, or diversion of wastewater from the SSS. SSOs include overflows or releases of wastewater that reach waters of the United States (U.S.); overflows or releases of wastewater that do not reach waters of the U.S.; and wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is not an SSO.

   Provide a listing of all SSOs that occurred from September 2009 to the present. For each SSO provide the following:

   a. Date(s) of the SSO;
   b. Time (and Date if other than a. above) when the City was notified that the SSO event occurred;
   c. Time (and Date if other than a. above) when the City (or contractor) crew responded to the SSO;
   d. Time (and Date if other than a. above) when the SSO ceased;
   e. Time (and Date if other than a. above) when corrective action was completed;
   f. Location of the SSO, including source (pump station, manhole, etc.);
   g. Ultimate destination of the SSO, such as surface waterbody (by name, if available), storm drain leading to surface waterbody (by name, if available), dry land, building, etc.;
   h. Volume of the SSO;
   i. Cause of the SSO such as grease, roots, other blockages, wet weather (infiltration and inflow), loss of power at pump station, pump failure, etc.;
   j. Corrective actions taken to stop the SSO; and
   k. Corrective actions taken to prevent this or similar SSOs in the future.

   If available, please provide the above information in a Microsoft compatible spreadsheet format.

3. If the City has a formal written plan for responding to, addressing, and reporting SSOs (i.e., a Sewer Overflow Response Plan ("SORP")), provide a copy of the plan.

4. Provide a copy of any additional City procedures not included in the SORP (as referenced in Question 3 above) for the following activities:

   a. Documenting SSOs;
   b. Estimating SSO volume;
   c. Identifying root causes of SSOs;
   d. Containment and clean-up of SSOs, including any specific procedures addressing backups into buildings caused by mainline problems;
   e. Identifying wet weather related SSOs and reconnaissance of these during rain events; and
   f. All reporting of SSOs to the permitting authority, the State of Mississippi.

5. Provide the name of the person (or position title) responsible for each of the activities identified in the City's SORP and/or listed in Question 4 above.

ENCLOSURE B

RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS
(40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, EPA may make the information available to the public without any further notice to you.

40 C.F.R. §2.203(b). **Method and time of asserting business confidentiality claim.** A business which is submitting information to EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.

BLANK PAGE

#3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 13 2015

CERTIFIED MAIL 7010 1060 0002 1703 9188
RETURN RECEIPT REQUESTED

The Honorable Johnny Magee
Mayor, City of Laurel
401 North 5th Avenue
Laurel, Mississippi 39440

Re: U.S. Environmental Protection Agency and Mississippi Department of Environmental Quality Compliance Evaluation Inspection and Reconnaissance Inspection
Notice of Violation and Opportunity to Show Cause
National Pollutant Discharge Elimination System Permit (NPDES) Nos.:
MS0024163 and MS0020176
Laurel Publically Owned Treatment Works Number 1 and Laurel Publically Owned Treatment Works Number 2 (POTW) Wastewater Treatment Plants

Dear Mayor Magee:

The purpose of this letter is to advise the City of Laurel (the City) that the United States Environmental Protection Agency Region 4 has reviewed the results of a Compliance Evaluation Inspection/ Reconnaissance Inspection that was conducted on December 16, 2014, by the EPA and the Mississippi Department of Environmental Quality on the City's Wastewater Collection and Transmission System (WCTS) and its associated Wastewater Treatment Plants (WWTPs), the Laurel POTW Number 1 (locally referred to as the Massey WWTP) and the Laurel POTW Number 2 (locally referred to as the Smyly WWTP). The inspection results are summarized in the enclosed inspection report.

Based upon review of the inspection results, the EPA has determined that the City has violated the Clean Water Act (CWA) as follows:

> During the period of September 2009, through August 2014, the City reported 35 Sanitary Sewer Overflows (SSOs) totaling over 1.5 million gallons of untreated sewage that discharged from the City's WCTS to navigable waters of the United States as defined by Section 502 of the CWA, 33 U.S.C. § 1362. Such SSOs were not authorized by the NPDES permits and are therefore violations of Section 301(a) of the CWA, 33 U.S.C. § 1311(a). In addition, the City had 49 SSOs totaling over 549,000 gallons of untreated sewage that was released from the WCTS and that did not reach navigable waters of the United States. All 84 SSOs are indicative of the City's violation of Permit Condition T-28 (Proper Operation, Maintenance and Replacement) and Permit Condition T-29 (Duty to Mitigate) of NPDES Permit Nos.: MS0024163 and MS0020176, which requires the City to properly operate and maintain its facilities and to "minimize or prevent discharges" from the system. The City has also failed to perform basic maintenance requirements for the WWTPs, in violation of Permit Condition T-28 (Proper Operation,

Maintenance and Replacement). Specifically, the Massey WWTP clarifier weirs have damaged or broken weir plates impeding the proper operation of the clarifiers and both the Massey and Smyly WWTPs had excessive build-up of moss or algal growth in the clarifiers which also impedes the proper operation of the clarifiers.

Until compliance with the CWA is achieved, the City is considered to be in violation of the CWA and subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

Therefore, the EPA requests that representatives of the City contact the EPA within seven business days of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against the City for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. The City should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial information which may reflect an inability to pay a penalty. The City has the right to be represented by legal counsel.

Please be aware that the EPA may use information provided during the meeting or telephone conference in any enforcement proceeding related to this matter. Failure to schedule a show cause meeting may result in a unilateral enforcement action against the City. Notwithstanding the scheduling of a show cause meeting, the EPA retains the right to bring further enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

Please contact Mr. Dennis Sayre, of my staff, at (404) 562-9756 or by email at sayre.dennis@epa.gov to arrange a show cause meeting. Legal inquiries should be directed to Mr. William Bush, Associate Regional Counsel, at (404) 562-9538.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosure

cc: Mr. Randall Diaz
United Water, Inc.

Mr. Lorenzo Anderson
City of Laurel

Mr. Chris Sanders
Mississippi Department of Environmental Quality

Mr. Les Herrington
Mississippi Department of Environmental Quality

ENCLOSURE A

Compliance Evaluation Inspection Report

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4
Water Protection Division
NPDES Permitting and Enforcement Branch

WASTEWATER COLLECTION AND TRANSMISSION SYSTEM COMPLIANCE EVALUATION INSPECTION AND WASTEWATER TREATMENT PLANT RECONNAISSANCE INSPECTION REPORT

Water Department
City of Laurel
Jones County
Mississippi
NPDES Permit Nos. MS0024163 and MS0020176

Address:
902 West 6th Street
Laurel, Mississippi 39440

Inspection Date:
December 16, 2014

Inspectors:
Dennis Sayre, EPA Region 4
Sara Janovitz, EPA Region 4
Megan Rupp, MDEQ

Inspection Report Prepared by:
Dennis Sayre

January 20, 2015

TABLE OF CONTENTS

Contents

I. OVERVIEW 1
II. OBJECTIVES 1
III. INVESTIGATION METHODS 2
IV. REGULATORY SUMMARY 2
V. INSPECTION SUMMARY AND FINDINGS 3
A. Management Interview 3
B. SSO Observations 3
C. Site Inspection 11
D. Management, Maintenance and Operations (MOM) Programs 15
E. Wastewater Treatment Plant Reconnaissance Inspection 19
VI. CONCLUSIONS 21

ABBREVIATIONS AND ACRONYMS

CEI	Compliance Evaluation Inspection
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	United States Environmental Protection Agency
GIS	Geographic Information System
GPM	Gallons per Minute
I/I	Infiltration/Inflow
ICIS	Integrated Compliance Information System
LS	Lift Station
MDEQ	Mississippi Department of Environmental Quality
NPDES	National Pollutant Discharge Elimination System
MGD	Million Gallons per Day
MOM	Management, Operation, and Maintenance
RDII	Rain Derived Infiltration and Inflow
SORP	Sewer Overflow Response Plan
SSO	Sanitary Sewer Overflow
WCTS	Wastewater Collection and Transmission System
WWTP	Wastewater Treatment Plant

I. OVERVIEW

The City of Laurel (the City) owns two Wastewater Treatment Plants (WWTPs) and the associated Wastewater Collection and Transmission Systems (WCTSs) which consist of approximately 136 miles of sanitary sewer gravity pipes, 47 pump stations and associated appurtenances. United Water, Incorporated is contracted to maintain and operate the City's WWTPs and their associated WTCSs. The City serves approximately 19,760 residential customers and various business and industrial entities within the city limits.

The U.S. Environmental Protection Agency sent an Information Request Letter pursuant to Section 308 of the Clean Water Act (CWA) (308 Letter) to the City requesting information related to Sanitary Sewer Overflows (SSO) from the City's sewer system. The EPA received the City's response, prepared by United Water, dated September 26, 2014, to EPA's 308 Letter on September 30, 2014.

The EPA and the Mississippi Department of Environmental Quality (MDEQ) conducted a Compliance Evaluation Inspection (CEI) of the City's WCTS on December 16, 2014. The purpose of this CEI was to evaluate compliance with the CWA and the National Pollutant Discharge Elimination System (NPDES) permits as it relates to SSOs from the sewer system and to assess the City's Management, Operations and Maintenance (MOM) type programs.

The EPA discussed MOM programs United Water management, including inspection and maintenance records, sewer assessments, preventive maintenance and more. The EPA and MDEQ also interviewed management personnel and visited various sites in the WCTS including: the manholes located on North 5th Avenue, North 2nd Avenue and Herbert Avenue; Lift Station (LS) 22, located at Wayne Farms, LLC poultry processing plant; LS 34 ("Howard Ballast LS"), located at 580 Eastview Drive; the LS located at the 3600 block of Industrial Boulevard. The EPA also performed a reconnaissance inspection of the City's two WWTPs to assess the general condition of the facilities. This report describes the EPA's findings, and provides an initial analysis of SSOs from the sewer system. In this report, the EPA also identifies areas that need to be addressed and presents some preliminary recommendations.

Any property relating to the operation and maintenance of the Publically Owned Treatment Works (POTW), whether real or intellectual property, is assumed to be the property of the City for the purposes of this report. "United Water" will be referenced as appropriate.

II. OBJECTIVES

The specific objectives of the inspection were to assess the City's compliance with the CWA, evaluate reported SSOs, assess the MOM programs, where implemented, and to examine the causes of SSOs in the City's sewer system.

III. INVESTIGATION METHODS

The investigation included:

- Review the City's S308 Letter response;
- Review of the Integrated Compliance Information System - National Pollutant Discharge Elimination System (ICIS-NPDES) federal database, state documents and the NPDES Permit;
- Interviews with the United Water and City personnel; and,
- Visual inspection.

IV. REGULATORY SUMMARY

The MDEQ is authorized under the CWA to implement the NPDES program in Mississippi. The George Gaddy Treatment Facility #1 (permitted under the name Laurel POTW, No. 1), located at 1300 Creek Road Avenue, is authorized under MDEQ's NPDES Permit No. MS0024163 to discharge treated sewage into Tallahala Creek. The George Gaddy Treatment Facility #2 (permitted under the name Laurel POTW, No. 2), located at 341 Flora Avenue, is authorized under the NPDES Permit No. MS0020176 to discharge treated sewage into Tallahala Creek. POTW No. 1 and POTW No. 2 are both major dischargers with permitted capacities of 7.4 million gallons per day (MGD) and 6.6 MGD respectively.

The Tallahala Creek is a major tributary of the Leaf River in the Pascagoula River Basin. Tallahala Creek was listed as impaired for Organic Enrichment/Low Dissolved Oxygen in 1996 and again in 1998. MDEQ developed a Total Maximum Daily Load (TMDL), effective September 22, 1999, for POTW No. 1 and No. 2 (as well as one additional privately owned treatment works) to address the impairment. No other impairment was noted for this waterbody in or immediately downstream of Laurel.

SSOs are prohibited discharges based on Sections 301 and 402 of the CWA which generally prohibit the discharge of pollutants by any person unless authorized by an NPDES permit. Condition No. T-28 (Proper Operation, Maintenance and Replacement) of POTW No. 1 and No. 2 NPDES Permits requires the City to properly operate and maintain all components of the system to achieve compliance with the conditions of the permit. Condition No.T-29 (Duty to Mitigate) also requires the City to "take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit that has a reasonable likelihood of adversely affecting human health or the environment."

Discharges to waters of the United States from sanitary sewer systems are prohibited unless authorized by an NPDES permit. In addition, overflows from the sewer system that do not reach waters of the United States can be indicative of a failure to comply with the proper operation and maintenance provisions of City's permits.

V. INSPECTION SUMMARY AND FINDINGS

The EPA performed a pre-inspection evaluation and an on-site inspection of the WCTS. The pre-inspection evaluation of the City's WCTS consisted of examining historic records submitted by United Water, on behalf of the City. This section will provide a summary of both means of inspection.

A. Management Interview

The EPA and MDEQ met with the United Water personnel and City representatives which included the Director of Public Works and Mayor Johnny Magee, at 8:00 a.m., December 16, 2014, at the United Water's office in Laurel. Topics of discussion during the meeting included the use and documentation of any MOM programs, including Mapping, Sewer Overflow Response Plan (SORP), Preventive Maintenance Programs, Operations Programs, Continuous Sewer System Assessment Program (CSSAP), Capacity Assurance Program, and Fats, Oil, and Grease (FOG) Control.

The EPA discussed concerns relating to SSOs in detail with United Water's Area Manager, Mr. Randall Dias, and inquired about each program listed above to determine whether a formal or non-formal (not in writing) program existed to manage various maintenance and operations needs of the WCTS. MOM programs are discussed in more detail in Section V.E (Management, Operation and Maintenance Programs) below. Section V.B (SSO Observations) provides detailed discussions relating to SSOs.

B. SSO Observations

As requested pursuant to the 308 Letter, the City submitted to the EPA information related to SSOs that occurred from September 2009 through August 2014. The EPA analyzed the information and compiled results based on total number of overflows, total and average volume of overflows per year per 100 miles of pipe and the average volume per SSO. The EPA also categorized the SSOs by cause which included causation categories as listed in Table 1 below. Grease and roots blockage categories are frequently related causes in that grease accumulation around roots often cause blockages. It appears that grease and root blockages caused only 14% of the SSOs that occur in the City whereas 46% of the SSOs are caused by Rain Derived Infiltration and Inflow (RDII). SSOs caused by mechanical or electrical failures at a pump station amounted to 18% of the reported SSOs and 8% were associated directly with failed force mains (refer to Table 1 and Figure 1 below). Of the 84 SSOs reported to the EPA, 35 were reported to have discharged into waters of the U.S.

Cause Summary	No. of SSOs
Blockage	14
Contractor Damage	6
FM Failure	7
Pipe Failure	6
Lift Station Failure	18
RDII	33
Total	84

Table 1. SSO Cause Count.

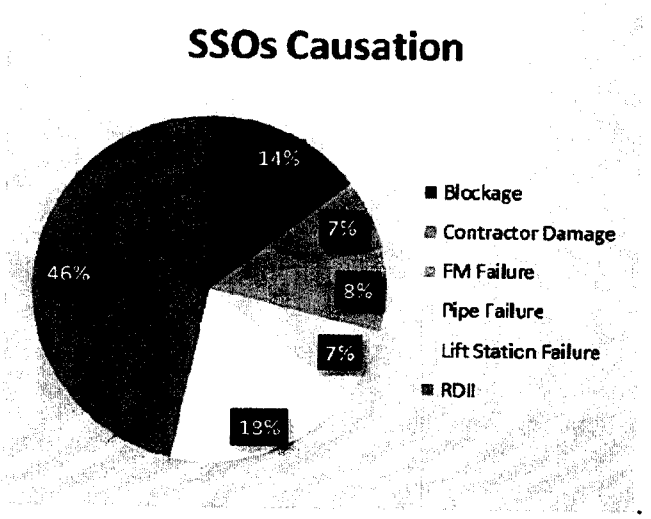


Figure 1. SSO Causation Chart.

All SSOs reported to the EPA were plotted on a map as shown in Figure 2 below. The EPA discussed four specific SSO locations circled in Figure 2. SSOs reported at N 5th Avenue, N 2nd Avenue, and Herbert Avenue, appeared to be chronic SSO locations due to lack of system capacity from excessive flow caused by RDII during wet weather events. One area of concern on Industrial Boulevard experienced an excessive number of force main pipe failures. These locations were discussed in detail with United Water management. Table 2 summarizes RDII related SSOs reported by the City.

RDII SSO locations	SSO Count
N 5th Ave	12
Herbert Ave	9
N 2nd Ave	3
Johnson Circle	5
E 5th Street	1
Flynt Rd	1
Maple Street	1

Table 2. RDII caused SSO locations.

United Water personnel and contractors investigated the cause of SSOs on N 2nd and N 5th Avenues in early 2014 and discovered that large volumes of stormwater was being discharged into the sanitary sewer system from illicit discharge points located on the property of the Wayne Farms chicken processing plant, causing SSOs upstream of the Wayne Farms LS. United Water stated that the illicit discharges of stormwater have since been disconnected from the WCTS and further stated that the City plans to increase the lift station capacity for the Wayne Farms LS, which is supported by a Community Development Block Grant. The SSOs reported at the Wayne Farms plant are listed in Table 2, as E 5th Street. Disconnecting the illicit stormwater discharges appears to have positively affected the flow capacity of the WCTS at N 2nd/N 5th Avenue, E 5th Street and at Herbert Avenue.

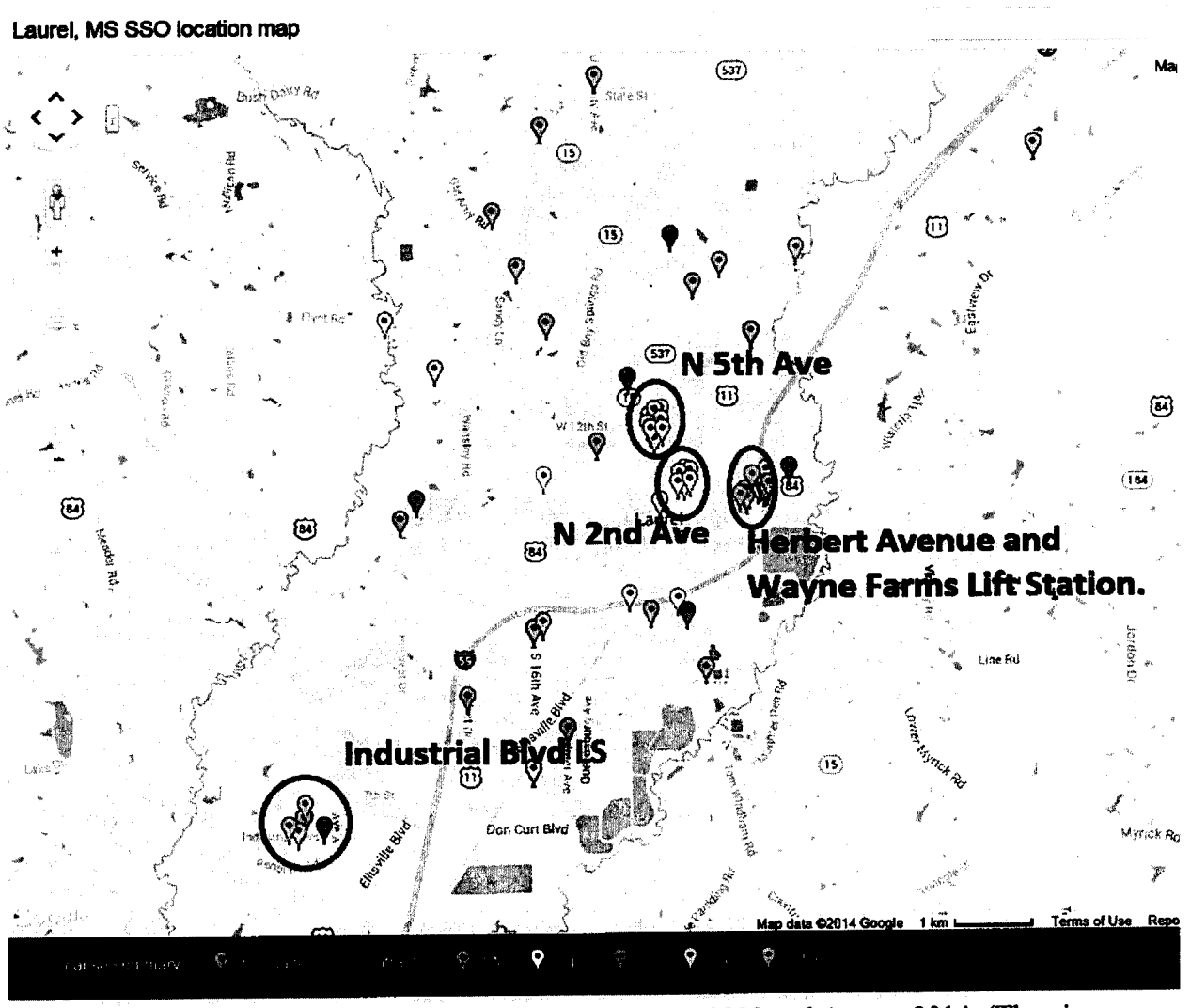


Figure 2. SSO map for SSOs occurring between September 2009 and August 2014. (The pin locations are an approximation of SSO locations).

The gravity pipes and manholes on Herbert Avenue are located in close proximity to the WWTP, as is the Wayne Farms LS. The Wayne Farms LS gravity pipe transmits industrial waste to the Anaerobic Pond at POTW No. 2 (Smyly WWTP). The gravity pipes on Herbert Avenue and the N 2nd/N 5th Avenue SSO locations are connected at E 5th Street and transmitted directly to the WWTP receiving pond by gravity (according to the sewer pipe drawings provided), which in turn is presumably pumped to the head works and receiving secondary treatment at the oxidation ditch. It is unclear how the Wayne Farm and E 5th St gravity pipe segments are connected at the manhole marked in Figure 3, but United Water stated that the Wayne Farms collection system is connected at this manhole to prevent sewage overflows from the lift station wet well to protect the food processing operation. These SSO locations are discussed further in the Site Inspection section below.

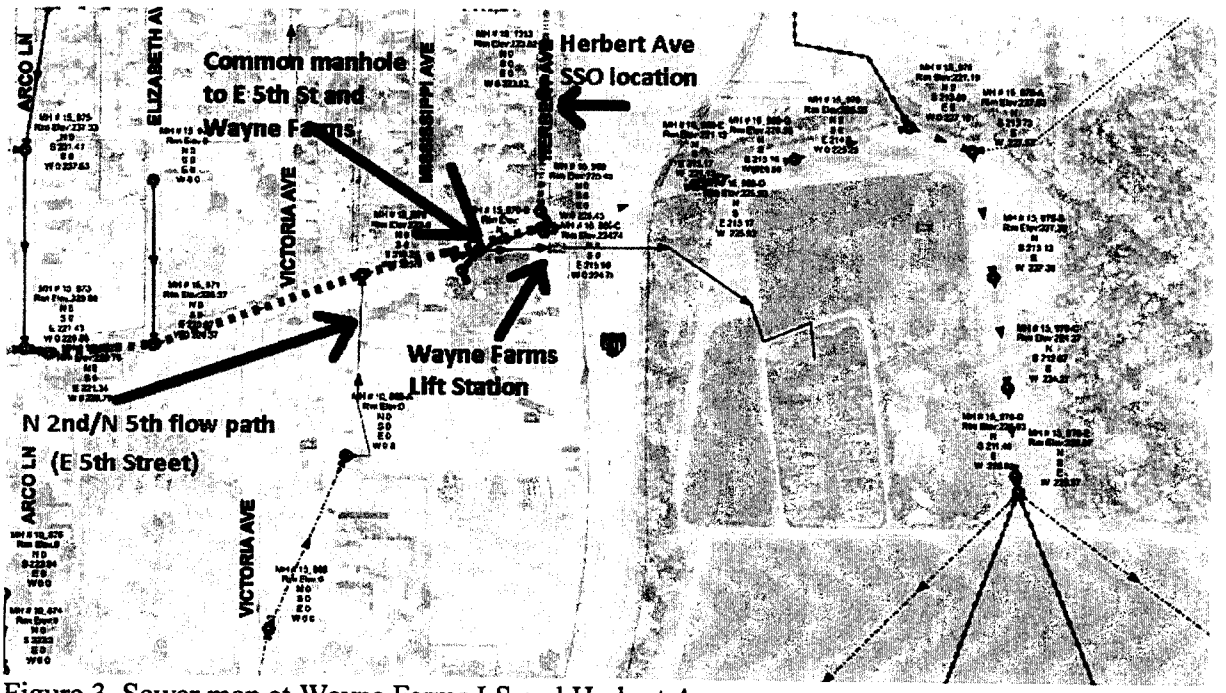


Figure 3. Sewer map at Wayne Farms LS and Herbert Avenue.

SSOs reported on Johnson Circle were not specifically discussed during this interview. These SSOs occurred between December 2009 and March 2011. The City's 308 Letter response indicated that these SSOs were addressed through sewer rehabilitation. No SSOs were noted since March 2011 at the Johnson Circle location.

United Water management reiterated that the City has invested major funds into rehabilitation and system upgrades since 2009. Additional rehabilitation plans are underway for the City's WCTS. The 308 Letter response also included a summary of rehabilitation activity and funding plans, as shown below.

Capital Sewer Projects - Laurel, MS

2009 SRF Sewer Improvements – Contract 1
-Replaced 12,788 LF of sewer main and 55 manholes
-Rehabilitated 5,451 LF of sewer main and 267 VLF of manholes
Began Design – April 2009
Began Construction – September 2010
Completed Construction – December 2011
Total Project Cost: $2,625,652

2009 SRF Sewer Improvements – Contract 2
-Replaced 903 LF of sewer main
-Rehabilitated 14,128 LF of sewer main and 500 VLF of manholes
Began Design – April 2009
Began Construction – September 2010
Completed Construction – June 2011
Total Project Cost: $1,424,340

Brown Street Sewer Improvements
-Installed 2,300 LF of new sewer main to allow for an additional capacity overflow from an existing main to prevent SSOs.
Began Design – November 2010
Began Construction – April 2011
Completed Construction – December 2011
Total Project Cost: $428,869

Inflow and Infiltration Study
-Conducted comprehensive I&I study to assess sewer collection system and identify projects to reduce major sources of I&I.
-Included 8 rain gauges, 33 flow meters, 226,000 LF of smoke testing, and 76,153 LF of cleaning and CCTV Inspection.
Began Study – November 2011
Completed Study – April 2013
Total Project Cost: $432,620

Generator Upgrades
-Installed 2 new generators at both WWTP facilities to allow complete continuous operation of WWTP in the event of power failure.
Began Design – November 2011
Began Construction –March 2013
Completed Construction – November 2013
Total Project Cost: $630,836

WWTP Headworks Upgrades
-Installed new bar screens, new influent pumps and upgraded controls at both WWTP facilities to help eliminate system surcharges and better handle high flow events.
Began Design – April 2012
Began Construction – June 2013
Expected Completion Date – October 2014

Total Project Cost: $2,862,649

2013 SRF Sewer Improvements
-Project is funded, designed, and awarded to the low bidder. Construction NTP has been issued as of September 8, 2014.
-Plan quantities include 21,050 LF main rehabilitation, 15,200 LF main replacement, 750 VLF manhole rehabilitation, and 63 manholes replaced
Began Design – June 2013
Expected Construction Start Date –October 2014
Expected Completion Date – October 2015
Total Project Cost: $5,529,200

2013 Pump Station Improvements
This Project covered 15 Pump Stations and included:
Control Panel Upgrades/replacement
Pump repairs/replacement
Installation of SCADA for remote monitoring
Wet well repairs
Total Project Costs: $493,000.00

2013 Equipment Purchases for Maintenance of the SSS
Vacon/Jet Truck for Cleaning of the SSS and Pump Station Wet Wells
TV/Camera Truck for assessing the SSS and recommending: repair, replacement, etc..
Backhoe for making repairs
Dump Truck
Smoke testing equipment: Fans, blowers, smoke sticks
Total Equipment Costs: $764,741.00

2014 Pump Station Improvements
This Project covered 15 Pump Stations and included:
Control Panel Upgrades/replacement
Pump repairs/replacement
Installation of SCADA for remote monitoring
Wet well repairs
Total Project Costs: $500,000.00

2016 SRF Sewer Improvements
-Facilities plan submitted and approved by MDEQ.
-Preliminary quantities include 21,600 LF main replacement, 7,730 LF main rehabilitation, 74 manholes replaced, and 230 VLF of manhole rehabilitation.
Expected Design Start Date– Spring 2016
Expected Construction Start Date – Summer 2017
Expected Completion Date – Summer 2018
Total Project Cost: $3,175,930

Findings:

Data submitted to the EPA indicates that the City is experiencing SSOs at a rate of 12.4 SSOs per 100 miles of pipe per year for the period evaluated. Refer to Table 3 for the annual breakdown and analysis of SSOs.

Date	SSOs
09/2009 - 08/2010	9
09/2010 - 08/2011	7
09/2011 - 08/2012	11
09/2012 - 08/2013	24
09/2013 - 08/2014	33
total	84
annual average	16.8
SS0/100 MOP/year	12.4

Table 3. SSO analysis.

As indicated above, the majority of the reported SSOs is due to a lack of capacity to transmit excessive flow caused by RDII. The EPA examined rain events during the period from August 2009 to September 2014 to approximate the size of rain storm that would cause enough RDII in the system to hydraulically overload the gravity pipes, resulting is SSOs. Table 4 below references the rain data summary for those days that the City reported SSOs. National Oceanic and Atmospheric Administration (NOAA) rain data can be found in Enclosure 1.

Data collected from NOAA is raw data from USGS weather station 224939 located on Tallahala Creek at Hwy 15 (east-central part of the City) and from a Private Weather Station number KMSLAURE2, located in the Pine Belt area in the northern part of the City. Rain data was collected from two rain stations to increase accuracy of observed rain events throughout the City. The data collected from NOAA indicating 0" inches in Table 4, when rain likely occurred on that date, may be due to unavailable data for that specific day. RDII derived SSOs in sanitary sewer systems typically behave such that a rain event on any given day will likely cause an SSO to occur at the same location given the same or similar rain event, all things being equal. An examination of Table 4 indicates that the probability of an SSO occurring on Herbert Avenue is high for any rain event equal to or greater than 0.79 inches and could have occurred with rain events of smaller duration and intensity, as indicated in Table 4. Since some rehabilitation work was performed in sewersheds serving these SSO locations since early 2014 for North 5th Avenue, North 2nd Avenue, and Herbert Avenue and since 2011 for Johnson Circle, the same analogy may not hold true after completion of work; however, an analysis of the NOAA data indicates a high probability that SSOs occurred in much higher numbers than what was reported by the City.

Date (epa)	location summary (EPA)	Volume (EPA entry)	Cause Summary (EPA)	NOAA Rain Gauge Data(USGS station at Tallahala Crk) (daily-inches)	NOAA Rain Gauge Data (daily-inches)	Public Weather Station KMSLAURE2 (Pine Belt area north part of Laurel)
2/1/11	Flynt Rd	3,500	rain	0"	2.02" on 2/2	1.83"
2/11/13	Herbert Ave	2,400	rain	3.3"	2.6" on 2/12, 0.17" on 2/13	0"
3/11/13	Herbert Ave	400	rain	0.79"	.82" on 3/12	0.43"
4/11/13	Herbert Ave	900	rain	0.07"	1.63" on 4/12	0.38"
9/24/13	Herbert Ave	400	rain	0"	0" on 9/23, 2.63" on 9/22	1.08"
3/16/14	Herbert Ave	10	rain	2.02"	0" on 3/15	1.26"
4/4/14	Herbert Ave	525	rain	0"	1.95" on 4/5/14, 1.45 " on 4/6/14, 1.15" on 4/7	0.51"
4/14/14	Herbert Ave	500	rain	0"	3.32" on 4/15	1.96"
4/14/14	Herbert Ave	300	rain	0"	3.32" on 4/15	1.96"
4/28/14	Herbert Ave	700	rain	0"	4.02" on 4/29	2.54"
12/14/09	Johnson Circle	350,000	rain	0.03"	2.6" on 12/13, 0.34 on 12/12	1.8"
12/30/09	Johnson Circle	60,000	rain	0"	0.86" on 12/31	0.99"
2/4/10	Johnson Circle	25,000	rain	0.4"	3.1" on 2/5	4.24"
2/1/11	Johnson Circle	5,500	rain	0"	2.02" on 2/2	1.83"
3/9/11	Johnson Circle	25,540	rain	3.5"	0.15" on 3/8	1.71" (1.3" on 3/8)
7/19/12	Maple Street		rain	0.27	2.0" on 7/19	0"
4/4/14	N 2nd	525	rain	0"	1.95" on 4/5/14, 1.45 " on 4/6/14, 1.15" on 4/7	0.51"
4/14/14	N 2nd	500	rain	0"	3.32" on 4/15	1.96"
4/28/14	N 2nd	700	rain	0"	4.02" on 4/29	2.54"
12/8/13	N 5th Ave	500	rain	0.04"	0.73" on 12/7, 2.83" on 12/9	0.2"
3/28/14	N 5th Ave	1,750	rain	2.01"	0.8" on 3/29	2.34"
4/4/14	N 5th Ave	625	rain	0"	1.95" on 4/5, 1.45 " on 4/6, 1.15" on 4/7	0.51"
4/4/14	N 5th Ave	525	rain	0"	1.95" on 4/5, 1.45 " on 4/6, 1.15" on 4/7	0.51"
4/4/14	N 5th Ave	525	rain	0"	1.95" on 4/5, 1.45 " on 4/6, 1.15" on 4/7	0.51"
4/14/14	N 5th Ave	525	rain	0"	3.32" on 4/15	1.96"
4/14/14	N 5th Ave	500	rain	0"	3.32" on 4/15	1.96"
4/14/14	N 5th Ave	500	rain	0"	3.32" on 4/15	1.96"
4/14/14	N 5th Ave	500	rain	0"	3.32" on 4/15	1.96"
4/28/14	N 5th Ave	700	rain	0"	4.02" on 4/29	2.54"
4/28/14	N 5th Ave	700	rain	0"	4.02" on 4/29	2.54"
4/28/14	N 5th Ave	700	rain	0"	4.02" on 4/29	2.54"
4/14/14	Wayne Dr	300	rain	0"	3.32" on 4/15	1.96"

Table 4. Rain Data for RDII caused SSOs between December 2009 and April 2014. Data indicating 0" of rain may be due to a lack of available data and does not necessarily indicate that zero rain occurred.

A comparison of the data in Table 4 and the NOAA data indicates that SSOs likely occurred in at least one of these four locations: North 5th Avenue, North 2nd Avenue, Herbert Avenue and Johnson Circle. Table 5 shows the "Total Rain Days" for rain events as indicated in the "24 hour rain event >=" column. This table shows rain events that totaled 0.79 inches (or greater) of rain in a 24 hour period occurred for 131 days over a 5 year period. Comparing Table 4 and Table 5 concludes that at least one RDII derived SSO would have likely occurred on North 5th/2nd Avenue, Johnson Circle and/or Herbert Avenue over a total period of 131 days between October 2009 and September 2014. The City reported a total of 32 RDII derived SSOs that occurred over a period of 16 days between October 2009 and September 2014 indicating that the City has grossly under reported SSO events in the past.

24 hour rain event >=	0.79"	1.5"	2.54"
10/2009 - 9/2010	22	9	3
10/2010 - 9/2011	22	8	2
10/2011 - 9/2012	26	14	5
10/2012 - 9/2013	37	13	5
10/2013 - 9/2014	24	10	3
Totals Rain Days	131	54	18

Table 5. Rain days greater than or equal to 0.79", 1.5", and 2.54" of rain in a 24 hour period.

The EPA also examined SSO reports that were submitted to MDEQ by the City from August 2009 to December 2014. The reports to MDEQ appeared to match the SSOs reported by the City to the EPA and the SSO observed during inspection at the Howard Ballast LS was documented on MDEQs records. However, the SSO that occurred on Herbert Avenue, as noted in the site inspection below, was not recorded in MDEQs records. Enclosure 2 is a copy of MDEQ's SSO records from August 2014 to December 2014.

C. Site Inspection

The following are observations noted during the visual on-site inspection.

North 5th Avenue: The EPA and MDEQ visited several manholes on North 5th Avenue, many of which were bolted down. One manhole was opened and inspected (Figure 4 below). There was no clear evidence that any recent SSOs have occurred at these locations. Of note, the City was performing sewer rehabilitation on the gravity pipes about one city block away (Figure 5).

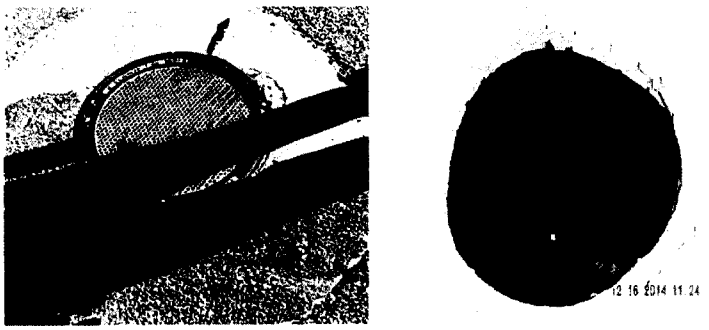


Figure 4. Manholes located approximately 30 yards apart on N. 5th Avenue.

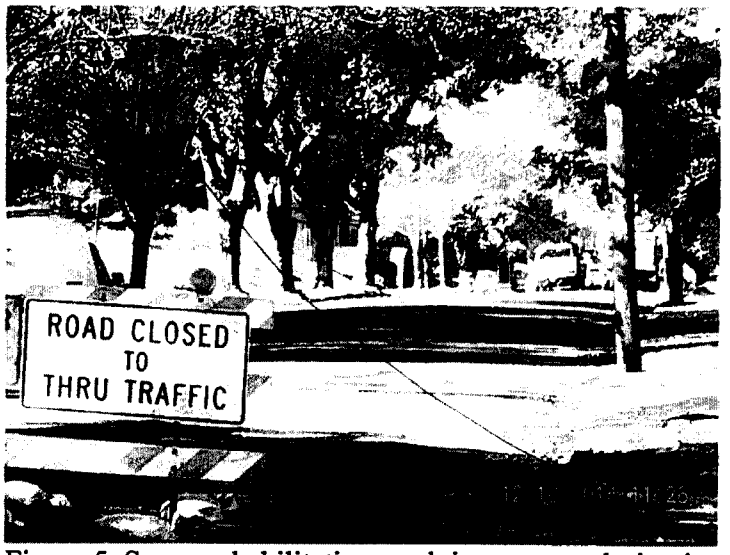


Figure 5. Sewer rehabilitation work in progress during inspection.

North 2nd Avenue: The EPA and MDEQ visited manholes on the corner of N 2nd Avenue and 7th Street. The manhole ladder rungs were coated with sewage debris up to the manhole crown indicating that this location has surcharged regularly in the past (Figure 6). However, there was no clear evidence that this site experienced any recent SSOs.

Figure 6. North 2nd Avenue manhole invert.

Herbert Avenue: The EPA and MDEQ visited two manholes, located in close proximity, on Herbert Avenue. Figure 7 shows fresh sewage debris on the interior and exterior crown of the manhole, indicating that an SSO had occurred as recently as the night before the inspection.

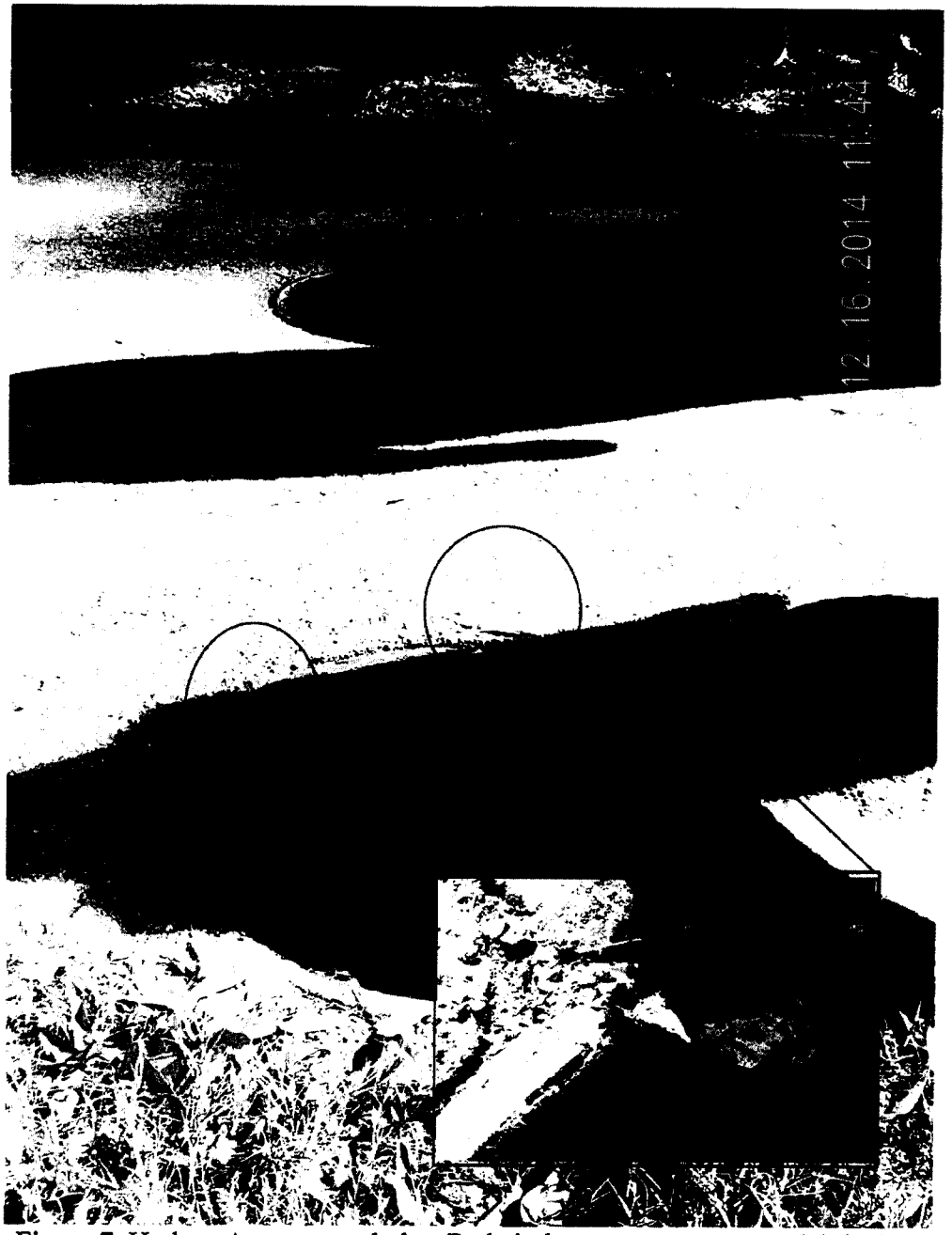


Figure 7. Herbert Avenue manholes. Red circles annotates sewage debris that was observed at the interior and exterior crown of the manhole.

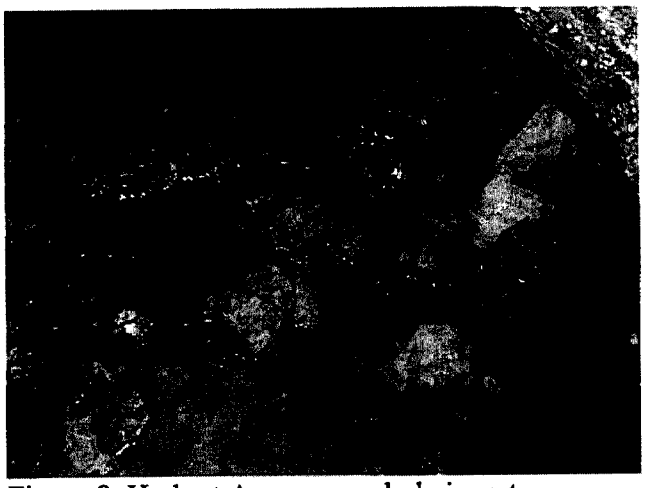


Figure 8. Herbert Avenue manhole invert.

The manholes on Herbert Avenue appeared to have deteriorated pipe capacity in at least one of the manholes and has an accumulation of sewage debris on all ladder rungs (Figure 8). Both of these manholes are about 5 feet in depth. The evidence collected at this site indicates that surcharging and SSOs continue to be a common occurrence from these shallow manholes. Figure 9 shows that SSOs reported to hit water by the City from this location directly impacts waters of the U.S.

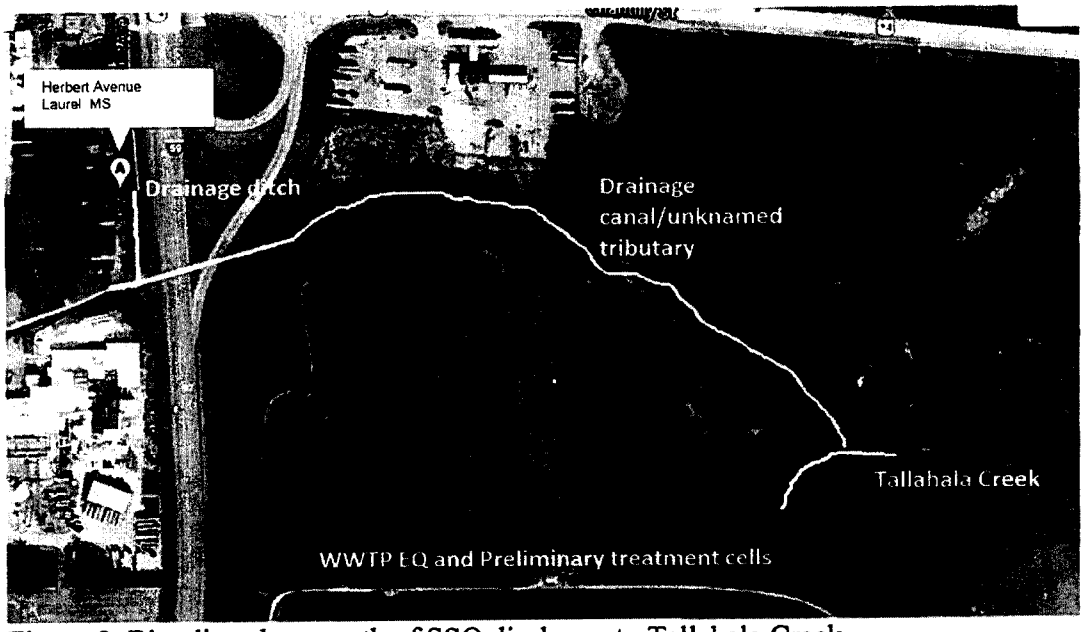


Figure 9. Blue line shows path of SSO discharge to Tallahala Creek.

Wayne Farms Lift Station: The Wayne Farms LS is located on the Wayne Farms, Inc. poultry processing facility. This lift station is scheduled for a wet well and pump upgrade to facilitate an increase in capacity. No evidence of SSOs were noted at this location. The facility handles a large amount of solids and biological oxygen demand constituents. The lift station appears to be operating properly.

Howard Ballast Lift Station: The Howard Ballast LS is located on the property of Howard Lighting Products, a division of Howard Industries, Inc. This lift station transmits industrial and domestic waste from this facility. United Water personnel disclosed that an SSO was occurring at this location at the time of inspection. An investigation after the incident showed that the pump impeller was clogged with rags which facilitated the incident. United Water personnel were on-site responding to the SSO well before the EPA's arrival. The facility was also instructed to cease its waste flow while the LS was off-line to correct the problem. United Water's response to the SSO appeared to be adequate to minimize the environmental impact and to correct the malfunction. Figure 10 shows the wet well and the exterior valve box for this lift station.

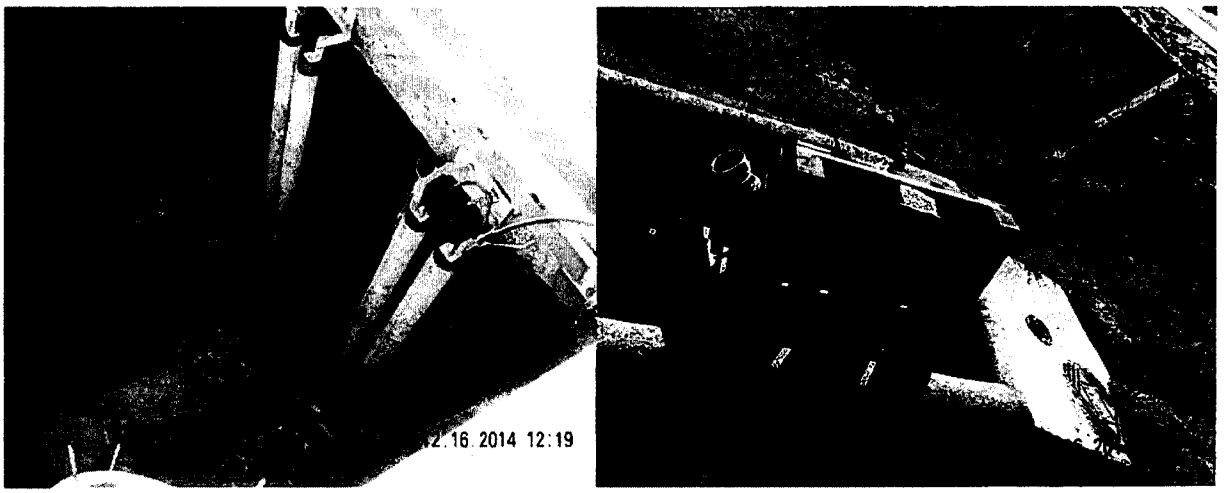


Figure 10. Howard Ballast LS wet well and valve box.

Industrial Boulevard Lift Station: This lift station was in good working order and appears to be operating properly. SSOs attributed to PVC force main failure was reported by the City from this location. Rehabilitation work has been performed on the lift station and the associated force main.

D. Management, Maintenance and Operations (MOM) Programs

As part of the initial inspection interview, the EPA made inquiries into what programs and procedures the City is utilizing to properly manage, operate and maintain the WCTS. This section will describe the EPA's findings as it relates to MOM type programs as well as a brief description of the types of programs that are typical of a well-run utility. MOM Program development guidance documents can be found on EPA, Region 4's website at http://www.epa.gov/region4/water/wpeb/momproject/.

1. Information Management System

The information management system enables utility management to adequately evaluate operation, maintenance, customer service (complaint response), and system rehabilitation activities so that overall system performance can be determined and utility planning can be conducted.

The City is currently utilizing management software ("eRportal") that was partially implemented at the time of the inspection. eRPortal is an automated asset management tool that includes work order and customer complaint tracking and, according to the product website, "applications that enable companies to optimize operations, maintain assets and infrastructure, and manage all related materials, resources, and logistics." The EPA did not assess the functionality of this software tool, but United Water expects that full implementation will occur during the first quarter of 2015.

2. Mapping Program

Formal Mapping Program documentation should be developed to ensure consistency of map protocol and to provide official guidance for map review and maintenance.

The City has its WCTS mapped in a GIS-based map that displays sewer pipe and manhole locations. The City also uses advanced software that allows United Water personnel to utilize hand held devices to view the sewer map.

3. Grease Control Program

The EPA recommends that the City develop documents that outline procedures and provide guidance on how to manage and reduce FOG build-up in the WCTS. A valid FOG program includes providing guidance documents for permitting, inspection, enforcement, compliance tracking, budgeting, establishing inspection priorities, public education guidance and performance goals and provide specific grease control obligations for food service establishments in accordance with City ordinances. Formal FOG program development should include a review of the City's ordinances to ensure that the appropriate personnel have the ability to adequately enforce FOG related ordinances.

The City enforces sewer ordinances through the City's Inspections Department. United Water states that the Inspections Department works closely with the Water Department and has been proactive in enforcing grease trap violations. A sufficient FOG Program document for the Water Department could outline the relationship between the departments, contact information, procedures used by United Water personnel to request the Inspections Department to investigate possible ordinance violations due to excessive grease build-up in gravity pipe segments and wet wells, and reporting and follow-up procedures.

4. Capacity Assurance Program

A formal Capacity Assurance Program includes specific criteria for approval of additions to the WCTS and/or WWTPs, balancing Permit requirements and the City's codes and ordinances; performance measures used to approve or deny an extension of the collection system; and procedures used to calculate capacity in the collection system and at the treatment plant.

5. Preventive Maintenance and Inspection Programs

A **Gravity Line Preventive Maintenance Program**. The Gravity Line Preventive Maintenance Program should include the following components: 1) blockage abatement mechanisms (including both hydraulic and mechanical cleaning); 2) root control mechanisms; 3) debris control mechanisms, and 4) manhole preventive maintenance procedures. This program should include the following activities: 1) identification of, and provision for, all personnel and equipment needed; 2) determination of the frequency; 3) establishment of procedures; 4) establishment of priorities for scheduling; 5) the use of standard forms; 6) establishment of record keeping requirements; 7) establishment of performance measures; and 8) integration of all data collected under the program with other information management systems.

The City currently cleans and inspects gravity lines on an as-needed basis.

A **Continuing Sewer System Assessment Program (CSSAP)**. The CSSAP should establish procedures for setting priorities and schedules for undertaking the WCTS assessment including: 1) corrosion defect identification; 2) routine manhole inspections; 3) flow monitoring; 4) CCTV activities; 5) gravity system defect analysis; 6) smoke testing, and; 7) pump station performance and adequacy analysis. The CSSAP should provide for the assessment of at least ten percent (10%) of the WCTS on average per year, resulting in the assessment of the entire WCTS at least once every ten years, and establish priorities and schedules taking into consideration the nature and extent of customer complaints; flow monitoring; location and cause of SSOs and WCTS deficiencies; any remediation work already ongoing; pump station run times; field crew work orders; any preliminary sewer assessments, such as flow monitoring results; community input; and any other relevant information.

A **Infrastructure Rehabilitation Program (IRP)**. The IRP should establish procedures for setting priorities and schedules for undertaking rehabilitation of the WCTS. The IRP should address Infiltration/Inflow (I/I), structural issues in the WCTS, and the other conditions causing SSOs, with the goal of eliminating future SSOs. The IRP should take into account all previous information the City has gathered including any information gathered pursuant to the CSSAP. The IRP should also establish standard procedures to analyze the effectiveness of completed rehabilitation projects.

The EPA noted during inspection that an I/I study was conducted in 2012 and that the City is focusing rehabilitation efforts to reduce I/I in an effort to mitigate RDII derived SSOs. The EPA also received various planning maps and descriptions indicating that the City is taking proactive steps to address RDII related SSOs.

A **Pump Station Operations and Preventive Maintenance Program**. The Pump Station Operation and Preventive Maintenance Program should include or address the following items/components described below:

i. Pump station operations at pump stations that are to be conducted on a routine, scheduled basis. The program should define the standard pump station operating procedures to be followed at each pump station such as reading and recording information from the elapsed time meters, recording information from the pump start counters, observing wet well conditions and grease accumulation, checking and re-setting, as necessary to improve system performance, wet well set points, checking and recording system pressure, checking SCADA components, checking alarms and stand-by power and identifying maintenance needs.

ii. Emergency pump station operations procedures. The program should address pump station operations at pump stations that are to be conducted as a result of equipment failure or loss of electrical power. The program should define the emergency pump station operating procedures to be followed at each pump station such as calling for emergency maintenance, initiating stand-by power by bringing in portable generators or initiating portable pump operations for pump around.

iii. The program should establish schedules, routes, priorities, standard forms and reporting procedures and establish minimum acceptable performance measures and condition grading criteria.

Preventive maintenance and inspection programs can have a significant positive impact on the future condition of the WCTS. A properly implemented preventive maintenance, inspection and rehabilitation programs can prevent a massive outlay of expenses needed to repair or replace parts of the system that maintenance and management personnel 'did not see' failing due to the lack of prevention. Relatively small preventive maintenance expenses now can save the City larger repair expenses in the future. Formal guidance can also be used to educate City officials, such as the Mayor and City Council responsible for funding decisions and the allocation of resources essential to proper operation and maintenance of the utility.

United Water appears to be applying adequate preventive maintenance on critical systems such as pump stations, air relief valves, force mains, etc. The City would benefit with formally written programs for the various reasons discussed above.

6. Sewer Overflow Response Plan

United Water has developed and implemented an *Incident Reporting SOP for Wastewater Spills and SSO Incidents*. This document includes procedures to respond to SSOs and procedures to report SSOs and bypasses to MDEQ. The document includes 24 hour verbal reporting procedures to MDEQ, as well as to "United Water Incident Reporting Hotline" and provides for incident tracking using commercial software (referred to as the Intelex reporting system). Reporting forms and examples are included for both verbal and written reports to MDEQ. The addition of volume estimating procedures would greatly improve this document.

Equipment available for responding to SSOs includes two VAC trucks, one CCTV truck and a portable camera. None of the lift stations utilize emergency back-up power, nor does the City maintain adequate portable back-up generators for running the lift stations during a major power outage; however, each lift station is equipped with bypass pump connectors and the City retains a local contractor to provide pumps and associated portable power as needed with strict time receipt requirements to respond to emergencies.

E. Wastewater Treatment Plant Reconnaissance Inspection

The EPA and MDEQ performed a Reconnaissance Inspection to ascertain the general condition of the City's wastewater treatment plants. The following summarizes EPA's findings.

1. Laurel POTW No. 1: This WWTP is an oxidation ditch activated sludge type of treatment plant. This plant is permitted under the name "Laurel POTW Number 1," however, the building signage at the facility labels the plant "George Gaddy Wastewater Treatment Facility #1," and the plant is locally referred to as the Massey WWTP.

   The Massey WWTP also has a large receiving pond, similar to a facultative lagoon, that receives sanitary sewage and excess wet weather flow, a decant pond for sludge dewatering and an "anaerobic pond" that handles industrial waste as a preliminary treatment process before transmitting to the oxidation ditch. The plant grounds appeared to be satisfactorily maintained. The influent pump station, oxidation ditches and UV disinfection systems were generally in good condition. Severe damage was noted on the weir of one of the clarifiers. The v-notch weirs appeared to be dysfunctional and at the end of service life (Figure 11).

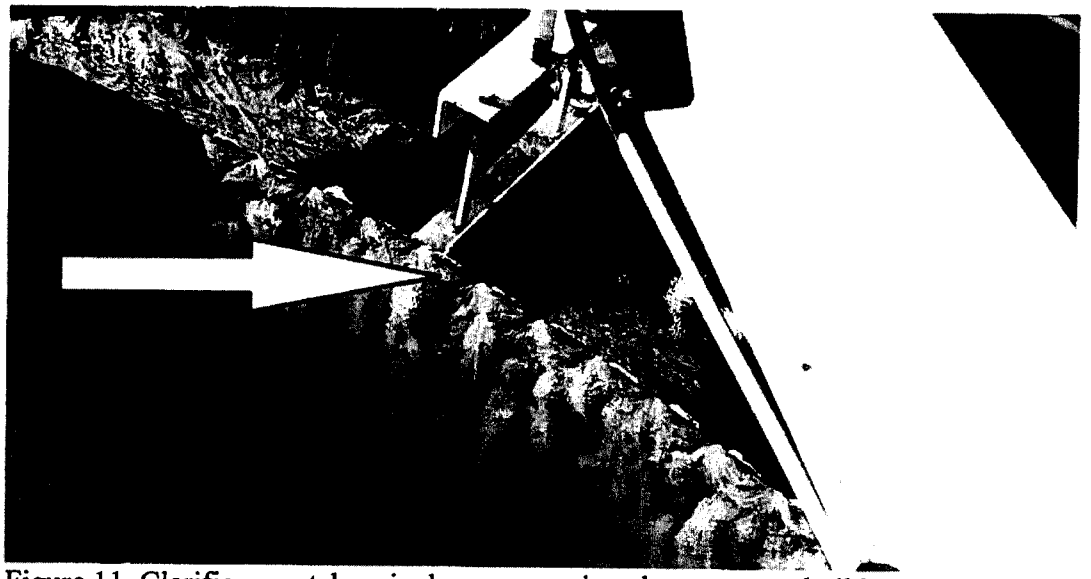


Figure 11. Clarifier v-notch weir shows excessive algae or moss build-up and extreme wear or damage.

An excessive amount of algae or moss was noted growing on the weirs and in other sections of the clarifier. The EPA observed the effluent from the outfall to the receiving waters and noted that the effluent appeared to be clean and clear.

2. Laurel POTW No. 2: This WWTP is an oxidation ditch activated sludge type of treatment plant. This plant is permitted under the name "Laurel POTW Number 2," however, the sign at the facilities office labels the facility the "George Gaddy Wastewater Treatment Facility #2," and the plant is locally referred to as the Smyly WWTP.

   This plant also has a large receiving pond, similar to a facultative lagoon, that receives sanitary sewage and excess wet weather flow, a decant pond for sludge dewatering and an "anaerobic pond" that handles industrial waste from Wayne Farms chicken processing plant as a preliminary treatment process before transmitting to the oxidation ditch. The plant grounds appeared to be satisfactorily maintained. The influent pump station, oxidation ditches and UV disinfection system was generally in good condition. The v-notch weirs appeared to be functional but had excessive algae/moss build-up and showed signs of corrosion.

Figure 12. Smyly WWTP clarifier weirs. (Note the difference in weir shape from Figure 11).

The EPA observed the effluent from the outfall to the receiving waters and noted that the effluent appeared to be slightly turbid (light brown) at the contact chambers but no notable color difference at the receiving water.

VI. CONCLUSIONS

The EPA noted that the City is taking the steps to mitigate SSOs and provide needed rehabilitation for the WCTS. However; SSOs located at Herbert Avenue are of considerable concern. United Water management informed the EPA that SSOs at North 5th and North 2nd Avenues may have been eliminated though rehabilitation performed in the sewersheds serving these locations. The City should provide firm evidence that these SSOs have been eliminated and are no longer chronic SSO locations or that the rehabilitation projects currently planned will adequately eliminate these SSOs.

The EPA also noted that some preventive maintenance procedures are being utilized by United Water that are in keeping with best management practices to operate and maintain the system; however, the discrepancies noted at the WWTPs are indicative of a lack of formal preventive maintenance guidance. With the exception of the *Incident Reporting SOP for Wastewater Spills and SSO Incidents,* the City and United Water do not have any formal documents to formalize programs utilized to properly manage, operate and maintain the WCTS. The EPA recommends that United Water and the City develop formal written document for MOM programs as outlined for the WCTS and the WWTPs.

The EPA is very concerned, as noted in Section V.B (SSO Observations), that SSOs are not being reported adequately. The City and United Water should formalize an SSO inspection route for, at minimum, those locations in the WCTS that have experienced more than one SSO at the same location over a period of 12 months, and all known historical RDII-related SSO locations. This inspection route should include SSO locations to be inspected, time and date inspected, and the signature of the person doing the inspection.

Lastly, the v-notch weirs at the Massey WWTP need to be replaced and the clarifiers at both WWTPs should be cleaned regularly to prevent excessive growth of algae/moss. Corrosion noted in the clarifiers should also be examined more closely and adequate steps should be taken to implement corrosion mitigation.

BLANK PAGE

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

#4

HABERSHAM METAL PRODUCTS COMPANY
RESPONSE TO QUESTIONS
FEBRUARY 3, 2017

1) It appears that going back to the early days of the published standards around 1985 that the same consulting firm, Rindt McDuff Associates, Inc. (Rindt McDuff), worked for both Habersham Metal Products and for the City of Baldwin. The Sewer Connection Agreement dated April 1991 between the Habersham Metal Products and the City of Baldwin illustrates the review and approval of Habersham Metal Products' wastewater discharges to the City sewer system with some restrictions to the discharge flow rates and type of wastewater. As no Industrial User Permit was noted to be required during this time, Habersham Metal Products and the City of Baldwin believed no discharge permit was required. Habersham Metal Products and the City operated under that agreement for many years. From 1991 to 1997, there were multiple correspondences between Habersham Metal Products, the City of Baldwin, and Rindt McDuff related to the wastewater discharges. Throughout all of these correspondences and the confidential compliance audits conducted by Rindt McDuff, Habersham Metal Products was informed that the facility was in compliance with the wastewater regulations. As such, no permit has been sought for the wastewater discharges.

2) COMMUNICATIONS DATE FROM 1991-1999 ARE ATTACHED AS APPENDIX A.

3) SEE DRAWING OF FACILITY GROUNDS AND SEWER LINES DATED 2-3-17 APPENDIX B

4) The Wash Tanks were originally installed and the containment pit built in approximately 1985. The Wash Tanks were originally a three stage system and did not include the Stage 2 and 4 rinse tanks. At this time permission was obtained to discharge the wastewater to the sewer through the City of Baldwin with the City's consulting firm, Rindt McDuff, acting as an intermediary.

   In 1991 - 1992 the Stage 2 and 4 rinse tanks were introduced to the system creating a five stage wash process. At this time, the rinse was a dip process and waste rinse water was discharged to the sewer through a controlled release process. Waste water was continued to be discharged to the sewer by controlled release in accordance with the agreement with the City of Baldwin established through the City consulting firm, Rind McDuff. See waste water procedure APPENDIX C.

(Cont. Page 2)

HABERSHAM
METAL PRODUCTS COMPANY

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

RESPONSE TO QUESTIONS, February 3, 2017, Page 2

In 1995, the exterior holding tank was introduced in order to introduce storage capacity to the wash system and to provide a fresh water system and controlled release of the waste water. The process lasted approximately two years, from 1995 - 1997. This process was also approved through the City of Baldwin with Rindt McDuff acting as an intermediary.

In 1999, the rinse tanks 2 and 4 were converted to a spray rinse, and the rinse water was discharged to the City of Baldwin through the previously established agreements. The rinse water continued to be discharged to the City in accordance with the previously established agreements.

Starting from 1997 – 2010, waste wash water for Tanks 1, 3, and 5 was hauled off by Environmental Remedies on a monthly or bimonthly basis as recommended by the wash chemical company, Oakite. See waste water procedure APPENDIX D. Spray rinse from Tank 2 and 4 continued to be discharged to the city sewer system.

In 2010 – 2011, the wash chemical was changed to Houghton, because Houghton indicated that their wash chemical would not need to be changed as frequently as with the Oakite wash chemicals, thus resulting in a cost savings for the facility. The wastewater for Tank 1, 3, and 5 was then hauled off every 2 - 3 years as recommended by the wash chemical manufacturer, Houghton.

From 2011 – 2016, the wastewater for Tanks 1, 3, and 5 continued to be hauled off every 2 - 3 years as recommended by Houghton. The spray rinse for Tanks 2 and 4 continued to be discharged to the City sewer system.

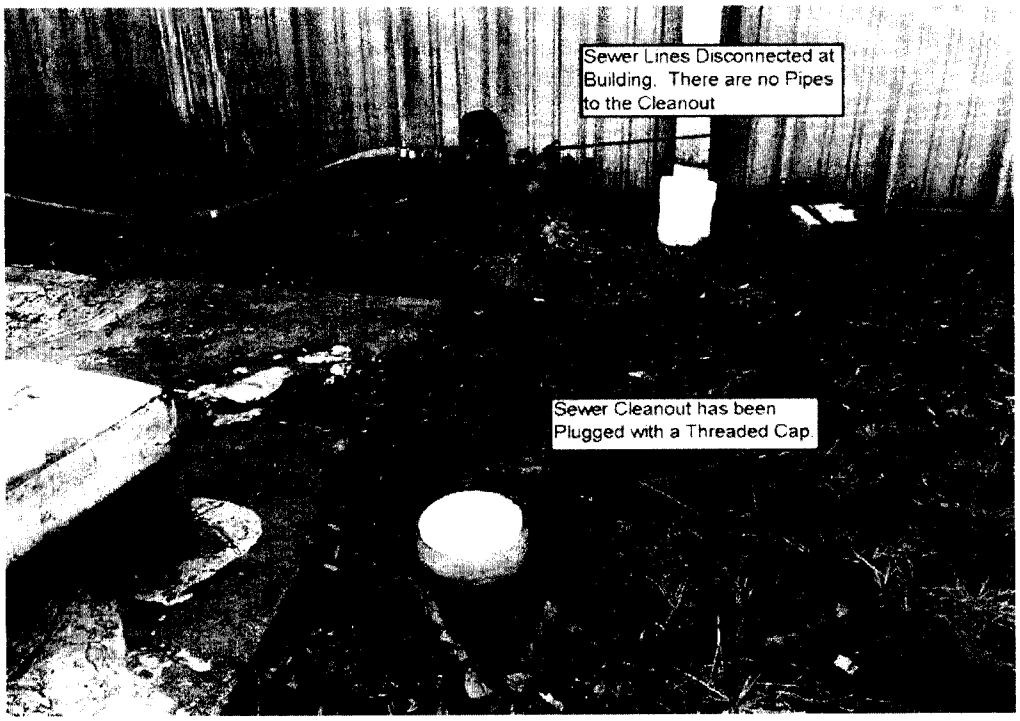
In December 2016, all discharges of process wastewater to the sewer system ceased in response to the EPA Notice of Violation dated Monday December 12, 2016 and received on Tuesday December 13, 2016. Discharges were ceased and the sewer connection related to the wash tanks and finishing area was disconnected on Thursday December 15, 2016 as shown in the following photograph.

(Cont. Page 3)

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

RESPONSE TO QUESTIONS, February 3, 2017, Page 3



Sewer Cleanout Disconnect 12-15-16

5) See the photo in Response 4. There were no wastewater treatment systems in place for the spray rinse being discharged at the time of the inspection on September 30, 2015.

6) a) See the timeline in Response 4. These tests or inspections were not documented. The Houghton representative would visit and inspect the tanks and conduct in-house process testing for titration and pH and let production personnel know whether or not to change or add chemicals or water and how long the wash solution might be good for further.

b) After the switch to Houghton, monthly - bimonthly disposal of the wastewater was no longer necessary. The last change-out and treatment of the wastewater from the Tanks 1, 3, and 5 was by HEPACO and occurred on Tuesday November 10, 2015. No disposal of the wastewater from the Tanks 1, 3, and 5 has occurred since this time.

(Cont. Page 4)

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

RESPONSE TO QUESTIONS, February 3, 2017, Page 4

c) Habersham Metal Products' understanding is that the new wash chemical process provided by Houghton is a wash detergent and phosphate solution similar to Oakite, but is also provides a slight coating and sealer, which is much more efficient and less aggressive than the Oakite. The claims by Houghton that the wash water will not have to be replaced as often as with the Oakite wash chemicals have been substantiated by Habersham Metal Products' production management and understanding that there are much less paint quality issues in the products and cost of wastewater disposal than with the Oakite wash chemicals.

Submitted by:

HABERSHAM METAL PRODUCTS COMPANY, INC.

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

APPENDIX A

COPY

#7158

SEWER CONNECTION AGREEMENT

Habersham County
State of Georgia

For and in consideration of the mutual covenants and recitals contained herein, the City of Baldwin, Georgia ("City"), a municipal corporation created and existing by virtue of the laws of the State of Georgia, and Habersham Metal Products Company ("Habersham") agree as follows:

The City will allow Habersham to connect to the City's sewer system under the following terms and conditions:

1. The City Engineer (Rindt-McDuff Associates, Inc.) will survey and design the sewer outfall line from Habersham consisting of approximately 1600 feet. The Habersham outfall will be an eight inch diameter pipe. The cost for engineering is $7,700 disaggregated as follows: surveys = $1,200; design = $4,500; inspection = $2,000. The City's Engineer will invoice the City at the completion of each phase with a copy of the invoice being sent concurrently to Habersham. Habersham agrees to reimburse the City for the above engineering expenses.

2. On or before the date that the Habersham Outfall becomes operational (date of "Substantial Completion" as determined by the City Engineer), Habersham agrees to annex its building and surrounding property into the City of Baldwin's corporate limits. Upon such annexation, the City agrees to provide Habersham with all services typically provided businesses within the City, such as fire and police protection.

3. The City agrees to forego any and all City property taxes to Habersham until such time as the cumulative amount of the foregone taxes reaches the cost of the sewer plus engineering fees less any reimbursements to Habersham from any source. Habersham will report all reimbursements to the City. The City will furnish Habersham with an annual statement showing the balance, credits for taxes and the remaining balance due Habersham.

4. The sewer will be deeded over to the City shortly after the date of final acceptance of the sewer. The City agrees to accept such ownership and the City agrees to maintain the sewer following the date of title transfer.

5. Habersham agrees to have the sewer constructed in accordance with the City Engineer's plans and specifications at Habersham's expense. In accordance with paragraph 1, above, the City Engineer will provide periodic inspection of the work to ensure that construction is proceeding in accordance with the plans and specifications. The City Engineer's decision regarding conformity to the

plans and specifications shall be final. Upon completion of the project Habersham will provide the City with a complete accounting of the project costs.

6. Habersham agrees to the following stipulations with regard to the discharge of its nondomestic wastewater into the City's sewer system.

   a. Habersham will provide for a slow release of industrial wastewaters into the City's sewer system. The release shall be at a rate no greater than 1000 gpd or at such other rate that the City may subsequently deem necessary to protect the City's wastewater treatment process.

   b. Habersham will neutralize the wastewater pH to a range of 6 to 9 prior to discharge.

   c. Habersham will allow the City or its representative to enter upon Habersham property to observe the industrial wastewater discharge procedures and to sample the wastewater at such times as the City may desire.

7. This agreement is subject to a review by legal counsel.

Two copies of this agreement have been executed by the parties, both copies of which shall be deemed originals.

Witness our hands and seals on the dates shown below.

CITY OF BALDWIN:

Mayor

Mayor pro Tempore

Clerk

Councilman

Councilman

Councilman

Councilman

Councilman

(affix corporate seal)

5/13/91

date

HABERSHAM METAL PRODUCTS COMPANY

by _____

title Pres.

date 4/15/91

_____
attest

(affix corporate seal)

BALDWIN CITY ATTORNEY
Reviewed and Approved

by _____

date 4-16-91

CITY OF BALDWIN

Post Office Box 247 • Baldwin, Georgia 30511-0247 • (706) 778-6341

July 13, 1993

Mr. Richard McCoy
Safety,Environmental and Compliance Director
Habersham Metal Co.
Stapleton Rd.
P.O. Box 739
Cornelia, Ga. 30531

Ref: Sewerage

Dear Mr. McCoy,

This letter is to advise you that the Mayor and Council reviewed Habersham Metals request to increase their daily sewerage waste from 2000 gallons per day to 3000 gallons per day. The request was investigated by Brian Rindt, the City of Baldwin Engineer, and voted upon unanimously to increase the sewer to 3000 gallons per day.

If you have any questions, please contact me!

Sincerely,

Paula DeLuca

Paula DeLuca
City Clerk

7188

Rindt-McDuff Associates, Inc.
Consulting Engineers

November 22, 1994

Mr. Richard McCoy
Safety Director
Habersham Metal Products Company, Inc.
P.O. Box 739
Cornelia, GA 30531

Dear Mr. McCoy:

You had requested confirmation of our telephone conversation of November 21, 1994 related to your request to discharge spent ammonium hydroxide and neutralizer from your blue print machine thru your equalization system and into Baldwin City Sewer System. On behalf of the City, we are giving you permission at this time to discharge up to one (1) gallon each (spent ammonium hydroxide and neutralizer) every two (2) weeks to the City Sewer System.

Should your requirements increase, please let us know so that we may re-evaluate this situation. Please advise if you require additional information.

Sincerely,

RINDT-MCDUFF ASSOCIATES, INC.

Fred C Hawkins

Fred C. Hawkins, P.E.
Vice President

FCH/dv
84016.00
cc: Ms. Paula DeLuca
City Manager
City of Baldwin

RECEIVED
NOV 28 1994
By RFM

334 Cherokee St. • Marietta, GA 30060 • Area Code 404/427-8123 • FAX No. 404/425-8930

Pick for your use r file

7188

TRANSMITTAL SHEET FROM THE CITY OF BALDWIN
P.O. BOX 247, BALDWIN, GEORGIA 30511

July 29, 1996

TO: HABERSHAM METAL PRODUCTS
P.O. BOX 739
CORNELIA, GEORGIA 30531

SUBJECT: SEWER USE ORDINANCE FOR INDUSTRIAL AND COMMERCIAL USERS

Dear Sirs,

In researching our files, I was not sure if you had received a copy of the Sewer Use Ordinance as adopted by the Mayor and City Council of the City of Baldwin, Baldwin, Georgia on July 10, 1995.

This new Ordinance was needed in order to comply with the amended State and Federal Environmental Regulations as they pertain to Waste Water Plants and especially for Industrial and Commercial Users.

From our sampling, it appears that your plant is currently in compliance with the regulations. We are required and will take samples from your system periodically and the samples will be tested for compliance. We do appreciate your good cooperation with us in the past and your compliance with the regulations.

Working together, we can avoid major problems for both of us.

Sincerely,

Graham C. Owen
Interim City Manager

7188

CITY OF BALDWIN

Post Office Box 247 • Baldwin, Georgia 30511-0247 • (706) 778-6341

DATE: SEPTEMBER 30, 1996

TO: HABERSHAM METAL PRODUCTS, INC.
BALDWIN, GEORGIA 30511

OFFICIAL NOTIFICATION OF PROVISIONS OF STATE AND FEDERAL ENVIRONMENTAL REQUIREMENTS AS ADOPTED BY THE CITY OF BALDWIN IN A SEWER USE ORDINANCE ON JULY 10, 1995

In order to comply with various Federal and State regulations relating to the disposal of various materials through any waste water plant or facility, the City of Baldwin adopted on July 10, 1995, a new Sewer Use Ordinance.

To comply with the provisions of the regulations and to meet certain standards in the disposal of certain materials and waste, the City of Baldwin must require all of our users to meet these same standards and requirements.

A copy of the Ordinance with highlights is enclosed for your information and required action.

We ask that if you are not in compliance with any of the requirements, that you make provisions to comply within Sixty (60) days from September 30, 1996.

An inspection of our system at your facility will be conducted some time in this year (1996) to ensure compliance.

Please do not put any solid waste into the system such as plastic, cardboard, and other solid matter.

Your cooperation in helping the City of Baldwin with this mandated compliance is appreciated.

Sincerely,

Graham C. Owen
Interim City Manager

for the Mayor and City Council

SEWR2.DOC/F/C

HABERSHAM METAL PRODUCTS CO.
ENGINEERED STEEL DOORS AND FRAMES
264 STAPLETON ROAD
P.O. BOX 739
CORNELIA, GEORGIA 30531

TELEPHONE 706-778-2212
FAX. NO. 706-778-2769

February 14, 1997

Mr. Graham C. Owen
Interim/City Manager
City of Baldwin
P.O. Box 247
Baldwin, GA 30511-0247

Dear Mr. Owen:

In accordance with the requirements of the City of Baldwin's Sewer Usage Ordinance, Section XI (c), Habersham Metal Products Co., hereby submits written notice of an accidental discharge to the Publicly Owned Treatment Works (POTW). As discussed in our telephone conversation on February 13, 1997, Habersham Metal Products accidentally discharged on February 10,11 and 12, 1997, 5,300 gallons of wastewater containing zinc at a concentration of 2.7 ppm (parts per million). The wastewater was released at a rate of 2 gallons per minute (gpm) over this time period.

Based upon our calculations, the increase in zinc discharged over our permitted limit would not significantly impact the zinc loading on the POTW. The POTW should only see an increase in the zinc concentration of approximately 0.01 mg/1 for each of these days. This calculation is based upon an average flow into the POTW of 200,000 gpd.

Habersham Metal Products did not become aware of the release above its zinc discharge limit until February 13, 1997. Upon discovering the release, Habersham Metal Products has worked diligently over the past two days to install new procedures to ensure that an accidental release does not happen again. Locks have been placed on all control valves of the wastewater tanks and no wastewater from these tanks will be discharged to Baldwin's POTW until all test results for scheduled discharges have been evaluated and approved by the Safety/Environmental Director or other designated personnel.

Habersham Metal Products values the relationship it has with the City of Baldwin and will continue to exhaust all efforts to comply with Baldwin's ordinances and guidelines.

Sincerely,

Richard McCoy
Safety/Environmental Director

RM/pw

cc: J.A. Stapleton, Jr.
File #7188

NAAMM METAL
THE NATIONAL ASSOCIATION OF ARCHITECTURAL METAL MANUFACTURERS

7188

!!!!! NOTICE !!!!!

TO WHOM IT MAY CONCERN:

Please be informed that The City of BALDWIN will be testing sewer lines in this area on JUNE 2, 1997 by the use of a smoking agent. The smoke should not enter buildings unless a leak is present or plumbing has been installed without the required traps. The presence of smoke in your building should be reported immediately to the City of BALDWIN by calling 706-778-6341.

The smoke used in the testing is relatively harmless but may be irritating to the nasal passages. Caution should be exercised by avoiding any unnecessary exposure to the smoke. However, any smoke will be temporary and should quickly disappear after exposure has ceased.

This testing is being conducted to identify and then eliminate surface and storm waters from entering the sewer lines. Elimination of extraneous flows will aid the City in reducing operating costs and extending the useful life of the sewerage system and the treatment plant.

Signed: MARK C. REED **Title:** MAYOR **Date:** 5/27/97

7188

HABERSHAM METAL PRODUCTS CO.

ENGINEERED STEEL DOORS AND FRAMES
264 STAPLETON ROAD
P.O. BOX 739
CORNELIA, GEORGIA 30531

TELEPHONE 706-778-2212
FAX NO. 706-778-2769
http://www.cyberhighway.net/~hmpco

June 4, 1997

Mr. Graham C. Owen
City Manager
City of Baldwin
P.O. Box 247
Baldwin, GA 30511-0247

Dear Mr. Owen:

Due to the increase in production and processing requirements, Habersham Metal Products will need to increase its water usage and thus increase its discharge of wastewater to the Publicly Owned Treatment Works (POTW). In an effort to comply with the City of Baldwin's ordinances and guidelines, Habersham Metal Products respectfully requests that the City of Baldwin allow the increase of daily flow to the City's POTW from 3,000 gallons per day (gpd) to 10,000 gpd.

The addition of our modular cell line has dictated the need to increase the cleaning time of our products during processing to insure that their quality will remain at the highest level. An increase in the cleaning time requires an increase of water flow through our rinse tanks which subsequently discharges to the sewer system. With the increase in wastewater discharge, Habersham Metal Products will continue to insure that the concentration of zinc in our wastewater that is discharged to the POTW is at a level below EPD's required limit of 1.48 milligrams per liter.

We respectfully ask that the City of Baldwin expeditiously review our request for an increase in our wastewater discharge rate and advise us as soon as possible of the date the approved increase may begin.

NAAMM METAL
THE NATIONAL ASSOCIATION OF ARCHITECTURAL METAL MANUFACTURERS

Because of the addition of the modular cell line, Habersham Metal Products has increased its number of employees to 282. As always, Habersham Metal Products values the relationship it has with the City of Baldwin and looks forward to continual growth with the city.

Sincerely,

Richard McCoy
Safety Environmental Director

RM/pw

cc: J.A. Stapleton, Jr.
Selina Walker
File #7188

7188

CITY OF BALDWIN

Post Office Box 247 • Baldwin, Georgia 30511-0247 • (706) 778-6341

June 10, 1997

Mr. Richard McCoy
Safety Environmental Director
Habersham Metal Products Co.
264 Stapleton Road
P.O. Box 739
Cornelia, Georgia 30531

Dear Richard,

Your letter of June 4, requesting additional flow to our Public Owned Treatment Works (POTW) - IE, Baldwin Wastewater Plant from 3,000 gallons per day to 10,000 gallons per day was reviewed by myself, our Engineers and the City Council on June 9, 1997.

After due consideration of the possible impact on our system, the Council approved this increase, effective June 9, 1997.

The above approval is based on Habersham Metal continuing to keep in place the security measures of the locks on tanks to avoid any accidental discharges into the system.

We congratulate Habersham Metal on its continued success and growth. We appreciate you as a good corporate citizen of Baldwin and look forward to our continued cooperation for the benefit of Habersham Metal and the Baldwin Citizens.

Sincerely,

Graham C. Owen
City Manager

CITY OF BALDWIN

Post Office Box 247 • Baldwin, Georgia 30511-0247 • (706) 778-6341

HABERSHAM METAL PRODUCTS CO.
RECEIVED
JUL 18 1997
CORNELIA, GA.

July 17, 1997

Habersham Metal Products, Inc.
P.O. Box 739
Cornelia, Georgia 30531

Dear Sirs,

We recently have been experiencing an inflow at our wastewater plant of a reddish paint like material.

A study to determine the content and analysis of this material is currently underway, but in the meantime, as the material is seriously effecting the operation of our plant, <u>we are asking the industries which are on our system to check for any possible accidental inflow to our sewer system from your plant.</u>

The EPD (Environmental Protection Division) of the Georgia Dept of Natural Resources closely monitors our plant. If this problem continues, we will be forced to place monitoring samplers on all industries and commercial operations which could cause the problem. If the problem is located, that industry or commercial operation will be subject to a very large fine, $10,000.00 per violation and will also have to pay for all costs of the monitoring devices, sampling and lab work.

Please check all of your operations immediately.

We appreciate your help and cooperation in this very serious matter.

Sincerely,

Graham C. Owen
City Manager

7188

HABERSHAM METAL PRODUCTS CO.

ENGINEERED STEEL DOORS AND FRAMES
264 STAPLETON ROAD
P.O. BOX 739
CORNELIA, GEORGIA 30531

TELEPHONE 706-778-2212
FAX NO. 706-778-2769
http://www.cyberhighway.net/~hmpco

July 25, 1997

Mr. Graham C. Owen
City Manager
City of Baldwin
P.O. Box 247
Baldwin, GA 30511-0247

Dear Mr. Owen:

After your letter of July 17, 1997, concerning the reddish paint like material, Habersham Metal Products made a review of our paint waste disposal procedure and an examination of our in-flow points to the P.O.T.W. The review and examination confirmed that Habersham Metal Products is in compliance with the City of Baldwin's ordinances and no improper or illegal materials are flowing to the P.O.T.W. from Habersham Metal Products. To confirm this further, Habersham Metal Products opened the man hole immediately below the collection point off of Habersham Metal Products Company property. The flow was observed for a period of time and no unusual discharge was noted.

Habersham Metal Products is committed to a safe and clean environment and offers our cooperation in this investigation.

Sincerely,

Richard McCoy
Safety & Environmental Director

RM/pw

cc: J.A. Stapleton, Jr.
File #7188

NAAMM METAL
THE NATIONAL ASSOCIATION OF ARCHITECTURAL METAL MANUFACTURERS

HABERSHAM METAL PRODUCTS CO.

ENGINEERED STEEL DOORS AND FRAMES
264 STAPLETON ROAD
P.O. BOX 739
CORNELIA, GEORGIA 30531

TELEPHONE 706-778-2212
FAX No. 706-778-2769
www.habershammetal.com

August 12, 1999

Mr. Reggie Hampton
Water Superintendent
City of Baldwin
P.O. Box 247
Baldwin, GA 30511-0247

Dear Mr. Hampton:

In accordance with the requirements of the City of Baldwin's Sewer Use Ordinance, Section XI (c), Habersham Metal Products Company, hereby submits written notice of an accidental discharge to the Publicly Owned Treatment Works (POTW). As discussed in our telephone conversation on August 12, 1999, Habersham Metal Products accidentally discharged, sometime between August 6th and August 8th, 3,500 gallons of fresh water and Oakite Cryscoat 747 mixture. This mixture is used as a phosphate bath for our product and has a pH of 4. The cause of the spill was due to a faulty ball valve. This allowed the mixture to run to a sump area where the sump pump sent it to the POTW. The pump is normally left in the "off" mode to prevent accidental pumping to the POTW. The switch is now equipped with a lock to prevent unintentional activation.

Only trained and authorized personnel will have access to the pump switch.

Habersham Metal Products values the relationship it has with the City of Baldwin and will continue to exhaust all efforts to comply with Baldwin's ordinance and guidelines.

Sincerely,

Richard McCoy
Safety/Environmental Compliance Director

RM/pw

cc: J.A. Stapleton, Jr.
File #7188

NAAMM METAL
THE NATIONAL ASSOCIATION OF ARCHITECTURAL METAL MANUFACTURERS

ABERNATHY MEMORIAL LIBRARY
RECEIVED
JUN - 2 2003
CORNELIA, GA

CITY OF BALDWIN, GEORGIA

SEWER USE ORDINANCE

Sec. I. Purposes.

The purposes of this Ordinance are to prevent the introduction of pollutants into the City's sewer system which will interfere with the operation of the system; to prevent the introduction of pollutants into the City's sewage treatment facilities which would pass through the facilities, inadequately treated, into receiving waters or the atmosphere, or otherwise be incompatible with the facilities or the use of the sludge; to provide for equitable distribution of the cost of operating and maintaining the City's sewage transport and treatment systems; and for other purposes.

Sec. II. Definitions.

Unless the context specifically indicates otherwise, the following terms and phrases, as used in this Ordinance, shall have the meanings hereinafter designated:

Act or the Act: The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. 1251 et seq.

Approval Authority: The Director of the Georgia Environmental Protection Division.

Authorized Representative of Industrial User: An authorized representative of Industrial user may be a principal executive officer of at least the level of vice-president if the Industrial user is a corporation; a general partner of proprietor if the nondomestic user is a partnership or proprietorship, respectively; or a duly authorized representative of the individual designated above if such representative is responsible for the overall operation of the facilities from which the indirect discharge originates.

Biochemical Oxygen Demand (BOD): The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure in five (5) days at twenty (20) degrees Celsius, expressed in milligrams per liter.

Environmental Protection Agency or EPA: The U.S. Environmental Protection Agency, or where appropriate the term may also be used as a designation for the administrator or other duly authorized official of said agency.

Federal Categorical Pretreatment Standard or Federal Pretreatment Standard: Any regulation containing pollutant discharge limits promulgated by the EPA in accordance with section 307(b) and (c) of the Act (33 U.S.C. 1347) which applies to a specific category of industrial users.

Floatable Oil and Grease: Oil, fat or grease in a physical state such that it will separate by flotation from wastewater by treatment in an approved pretreatment facility or sand and oil/grease interceptor.

Grab Sample: A sample which is taken from a waste stream on a one-time basis with no regard to the flow in the waste stream and without consideration of time.

Grit: Matter consisting of sand, gravel, cinders, or other heavy solid materials that has settling velocities or specific gravities greater than those of organic putrescrible solids normally encountered in domestic wastewater.

High Strength Wastewater: Wastewater which contains quantities of specified constituents which exceed the quantities normally encountered in domestic wastewater (See Sec. XII.).

High Strength Wastewater Surcharge: The charge made in excess of the normal sewer service charge for all high strength wastewater.

Indirect Discharge: The introduction of wastewater into the City of Baldwin Wastewater System for treatment and disposal by the City of Baldwin.

Infiltration/Inflow: Groundwater and surface water which leaks into the wastewater system through cracked pipes, joints, manholes or other openings.

Inflow: Water that flows into the wastewater system from the surface, streams, roof drains, down spouts or other such source.

Interference: The inhibition or disruption of the wastewater treatment processes or operations which contributes to a violation of any requirement of the City's NPDES permit or detrimentally affects the operation of the wastewater treatment processes.

National Pollution Discharge Elimination System or NPDES Permit: A permit issued pursuant to section 402 of the Act (33 U.S.C. 1342).

Person: Any individual, partnership, copartnership, firm, company, governmental entity or any other legal entity, or their legal representatives, agents or assigns. The masculine

gender shall include the feminine, and the singular shall include the plural where indicated by the context.

pH: The logarithm (base 10) of the reciprocal of the molar concentration of hydrogen ions in solution.

Pollution or Pollutants: The man-made or man-induced detrimental alteration of the chemical, physical, biological and radiological integrity of water or soil, or the products which create or cause such alteration.

Pretreatment or Treatment: The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutants, or the alteration of the nature of pollutant properties in wastewater to a less harmful state prior to or in lieu of discharging or otherwise introducing such pollutants into the wastewater treatment system. The reduction or alteration can be obtained by physical, chemical or biological processes, or by process changes or other means, except as prohibited by 40 CFR section 403.6(d).

Properly Shredded Garbage: The wastes from the preparation, cooking and dispensing of food that has been shredded to such a degree that all particles will be carried freely under the flow conditions normally prevailing in public sewers, with no particle greater than one-half inch in any dimension.

Publicly Owned Treatment Works (POTW): A treatment works as defined by section 212 of the Act (33 U.S.C. 1292) which is owned in this instance by the City. This definition includes any sewers that convey wastewater to the POTW treatment plant, but does not include pipes, sewers or other conveyances not connected to a facility providing treatment. For the purposes of this ordinance, "POTW" shall also include any sewers that convey wastewaters to the POTW from persons outside the City who are by contract or agreement with the City, users of the City's POTW.

Public Sewer: A common sewer controlled by a governmental agency or public utility, in this case, the City of Baldwin.

Sanitary Sewer or Sewer: A sewer that carries liquid and water-carried wastes from residences, commercial buildings, industrial plants, and institutions together with minor quantities of groundwater, storm waters and surface waters are not admitted intentionally.

Sewage: The spent water of a community. The equivalent term is "wastewater."

Sewer: A pipe or conduit that carries wastewater.

Shall and will is mandatory; **May** is permissive.

Significant Contributing Industry: Any industry which discharges greater than five thousand (5000) gallons per average working day of nondomestic wastewater into the City of Baldwin Wastewater System or who discharges wastewater which violates any of the prohibited discharges in Sec. or who is believed by the City of Baldwin Wastewater System ~~or who discharges wastewater which violates any of the prohibited~~ discharges in Sec. or who is believed by the City of Baldwin to discharge wastewater which violates any of the aforementioned prohibited discharges or who is subject to any Federal Categorical Pretreatment Standard.

Slug: Any discharge of water or wastewater which in concentration of any given constituent or in quantity of flow exceeds for any period of duration longer than fifteen (15) minutes more than five (5) times the average twenty-four-hour concentrations of flows during normal operation and shall adversely affect the collection system and/or performance of the wastewater treatment facilities.

State: State of Georgia.

Standard Industrial Classification (SIC): A classification pursuant to the Standard Industrial Classification Manual issued by the Executive office of the President, Office of Management and Budget, 1972, as amended.

Storm Drain: Sometimes termed storm sewer, it shall mean a drain or sewer for conveying surface water, groundwater, subsurface water, or unpolluted water from any source.

Storm Water: Any flow occurring during or following any form of natural precipitation and resulting therefrom.

Surcharge: A separate charge by the City of Baldwin for the handling and treatment of high strength wastewater.

Suspended Solids or Total Suspended Solids or TSS: Total suspended matter that either floats on the surface of, or is in suspension in, water, wastewater, or other liquids, and that is removable by laboratory filtering as prescribed in "Standard Methods for the Examination of Water and Wastewater" and referred to as nonfilterable residue.

Toxic Pollutant: Any pollutant or combination of pollutants listed as toxic in regulations promulgated by the administrator of the Environmental Protection Agency (EPA under the provision of CWA 307(1) or other acts.

Unpolluted Water: Water of quality equal to or better than the effluent criteria in effect or water that would not cause violation of receiving water quality standards and would not be benefitted by discharge to the sanitary sewers and wastewater treatment facilities.

User: Any person who consumes water from the City of Baldwin Water System or who contributes, causes or permits the contribution of wastewater into the City of Baldwin Wastewater System.

Wastewater: The spent water of a community. From the standpoint of source, it may be a combination of the liquid and water carried wastes from residences, commercial buildings, industrial plants, and institutions, together with any groundwater, surface water and storm water that may be present.

Wastewater Facilities: Shall mean the structures, equipment and processes required to collect, carry away and treat domestic and nondomestic wastewaters and to dispose of the effluent.

Sec. III. Prohibited Discharges.

No person shall discharge or cause to be discharged any of the following described waters or wastes into the City of Baldwin Wastewater System:

(a) Any gasoline, benzene, naphtha, fuel oil, or other flammable or explosive liquid, solid, or gas.

(b) Any waters, containing toxic or poisonous solids, liquids, or gases in sufficient quantity, either singly or by interaction with other wastes, to injure or interfere with any waste treatment process, constitute a hazard to humans or animals, create a public nuisance, or create any hazard in the receiving waters of the wastewater treatment facility.

(c) Any waters or wastes having a pH lower than 5.5 or greater than 9.5, or having any other corrosive property capable of causing damage or hazard to sewers, structures, equipment or personnel.

(d) Solid or viscous substances in quantities or of such size capable of causing obstruction to the flow in sewers, or other interference with the proper operation of the wastewater facilities such as, but not limited to, ashes, bones, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, underground garbage, whole blood, paunch manure, hair and fleshings, entrails and paper dishes, cups, milk containers, etc., either whole or ground by garbage grinders.

(e) Any garbage that has not been properly shredded. Garbage grinders may be connected to sanitary sewers from homes, hotels, institutions, restaurants, hospitals, catering establishments, or similar places where garbage originates from the preparation of food

in kitchens for the purpose of consumption on the premises or when served by caterers.

(f) Any waters or wastes containing odor-producing substances in sufficient quantity to cause the OSHA limits to be exceeded in the manholes, or any noxious or malodorous gas or substance capable of creating a public nuisance or hazard to life or preventing entry into sewers for the maintenance, inspection, and repair thereof.

(g) Any radioactive wastes or isotopes of such half-life or concentrations as may exceed limits established in compliance with applicable state or federal regulations.

(h) Quantities of flow, concentrations, or both which constitute a "slug," as defined in Section II.

(i) Waters or wastes containing substances which are not amenable to treatment or reduction by the wastewater treatment processes employed.

(j) Any water or wastes which, by interaction with other waters or wastes in the City of Baldwin Wastewater System, release obnoxious gases, form solids which interfere with the collection system, or create a condition deleterious to structures and treatment processes.

(k) Wastewater having a temperature higher than one hundred fifty (150) degrees Fahrenheit (sixty-five (65) degrees Celsius) or causing the temperature at the influent to a treatment plant to exceed one hundred four (104) degrees Fahrenheit (forty (40) degrees Celsius).

(l) Any substance which may cause the water pollution control facility effluent or any other products of the water pollution control facility such as residues, sludges, or scums, to be unsuitable for reclamation and reuse.

(m) Any substance which will cause the water pollution control facility to violate its NPDES Permit or the receiving water quality standards.

(n) Any wastewater with objectionable color not removed in the treatment process, such as, but not limited to, dye wastes, ink wastes, and vegetable tanning solutions.

(o) Any unpolluted cooling water, groundwater, roof drainage, basement drainage, subsurface drainage, or yard drainage through direct or indirect connection to the wastewater treatment facilities.

(p) No user shall discharge wastewater which exceeds the following shown limits:

	Maximum Allowable Concentration (mg/l) Ave. Workday
Arsenic	0.9
Barium	5.0
Beryllium	13.0
Boron	1.0
Cadmium	0.69
Chloride	250
Chromium, total	2.77
Copper	2.4
Lead	0.69
Manganese	5.0
Mercury	0.005
Nickel	3.98
Selenium	1.0
Silver	0.05
Tellurium	1.0
Tin	1.0
Zinc	2.61
Cyanide, total	0.7
Phenols, total	2.0
Oil and grease (total)	150
Oil and grease (mineral)	25
Herbicides, fungicides and pesticides	0
Total toxic organics*	2.13
Surfactants (as MBAS)	200

* Total toxic organics is the summation of all quantifiable values greater than 0.01 milligrams per liter (mg/l) for the organic compounds listed in 40 CFR 433.11(e).

Sec. IV. Federal and State Requirements

(a) Any laws or regulations promulgated by the State of Georgia relative to the construction or use of wastewater facilities which are more strict than the regulations provided in the City of Baldwin Code are incorporated herein by reference, and such regulations may be enforced by the City of Baldwin.

(b) Federal Pretreatment Standards.

(1) The Federal government has adopted regulations governing wastewater discharges from industries into publically owned wastewater treatment works (POTWS). These Federal regulations are generally referred to as the Federal Pretreatment Standards

or the Federal Categorical Pretreatment Standards, as set forth in 40 CFR Part 403, et seq. Any portion of these Federal Standards which are more strict than the regulations provided in the City Ordinance Code are incorporated herein by reference, and such regulations may be enforced by the City of Baldwin.

(2) It is the affirmative obligation of all industrial users regulated by the Federal Pretreatment Standards, inclusive of the Federal Categorical Pretreatment Standards, to comply with the Federal Standards, whether or not the industry has received notification from the City of Baldwin or any other jurisdiction of the existence and nature of the Federal Standards.

(c) Modifications to Federal Pretreatment Standards.

(1) From time to time the Federal Government may alter existing Federal Pretreatment Standards or promulgate new Standards. None of the provisions contained in the City of Baldwin Code shall prevent the timely implementation of new or altered Federal Standards by the industries to whom the new or altered Standards apply. Where new or altered Federal Standards are more strict than the Standards presently being imposed by the City of Baldwin, the City may, without prejudice, immediately revise any Industrial Wastewater Discharge Permits to reflect the new or altered Standards. If the industrial user is unable to immediately conform to the new or altered Standards, a reasonable schedule for compliance shall be provided by the City.

(2) Where the City's wastewater treatment system achieves consistent removal of pollutants limited by Federal Pretreatment Standards, the City may apply to the approval authority for modification of specific limits in the Federal Pretreatment Standards. "Consistent removal" shall mean reduction in the amount of a pollutant or alternation of the nature of the pollutant by the wastewater treatment system to a less toxic or harmless state in the effluent which is achieved by the system in ninety-five (95) percent of the samples taken when measured according to the procedures set forth in section 403.7(c)(2) of (Title 40 of the Code of Federal Regulations, Part 403) "General Pretreatment Regulations for Existing and New Sources of Pollution" promulgated pursuant to the Clean Water Act, as amended. The City may then modify pollutant

discharge limits in the Federal Pretreatment Standards if the requirements contained in 40 CFR Part 403, section 403.7 are fulfilled and prior approval from the Georgia Environmental Protection Division is obtained.

Sec. V. Wastewater Questionnaire.

All nondomestic users shall, upon the request of the City of Baldwin, complete and submit to the City, a wastewater questionnaire. The wastewater questionnaire shall be on a form provided by the City and shall be used for the purpose of determining whether the industry is a "Significant Contributing Industry" and for other purposes. The wastewater questionnaire shall include the following information, at a minimum:

(a) Name, address and location, if different from the address.

(b) SIC number according to the Standard Industrial Classification Manual, U.S. Office of Management and Budget, 1972, as amended.

(c) Wastewater constituents and characteristics, including but not limited to those shown in Section II.

(d) Time and duration of contribution.

(e) Average daily and three-minute peak wastewater flow rates, including daily, monthly and seasonal variations if any.

(f) Site plans, floor plans, mechanical and plumbing plans and details to show all sewers, sewer connections and appurtenances by the size, location and elevation.

(g) Description of activities, facilities and plant processes on the premises, including all materials which are or could be discharged.

(h) Where known, the nature and concentration of any pollutants in the discharge which are limited by the City, State or Federal Pretreatment Standards, and a statement regarding whether or not the discharge standards are being met on a consistent basis and if not, whether additional operation and maintenance (O&M) and/or additional pretreatment is required for the user to meet applicable discharge standards.

(i) If additional pretreatment and/or O&M will be required to meet the discharge standards, the shortest schedule by which the user will provide such additional pretreatment must be set forth. The completion date in this schedule shall represent a reasonable time-frame

when considering the circumstances of each individual situation. The following conditions shall apply to this schedule:

(1) The schedule shall contain increments of progress in the form of dates for the commencement and completion of major events leading to the construction and operation of the pretreatment facilities required for the user to meet the applicable discharge standards (e.g., hiring an engineer, completing preliminary plans, completing final plans, executing contract for major components, commencing construction, completing construction, etc.).

(2) No increment referred to in paragraph (1) shall exceed nine (9) months.

(3) Not later than fourteen (14) days following each date in the schedule and the final date for compliance, the user shall submit a progress report to the City of Baldwin, including, as a minimum, whether or not it has complied with the increment of progress to be met on such date and, if not, the date on which it expects to comply with this increment of progress, the reason for delay, and the steps being taken by the user to return the construction to the schedule established. In no event shall more than nine (9) months elapse such progress reports.

(j) Each product produced by type, amount, process or processes and rate of production.

(k) Type and amount of raw materials processed (average and maximum per day).

(l) Number and type of employees and hours of operation of plant and proposed or actual hours of operation of pretreatment system.

(m) Any other information as may be deemed by the City to be necessary to evaluate the permit application.

The City will evaluate the data furnished by the user and may require additional information.

Sec. VI. Sampling and Testing Procedures.

(a) Sampling Procedures.

When wastewater sampling is required by the City of Baldwin of any user for any purpose, the following sampling procedures shall be utilized: A twenty-four (24) hour composite sample shall be collected over

three (3) consecutive working days. Samples shall be taken of increments of not more than one hour, properly refrigerated and composited in proportion to the flow for a representative sample. The frequency of sampling, sampling chamber, metering device, sampling methods, and analysis of samples shall be subject, at any time, to inspect and verification by the City. Sampling and measuring facilities shall be such as to provide safe access for authorized personnel of the City for making such inspection and verification.

(b) Testing Procedures.

(1) All wastewater monitoring samples required by the City of Baldwin shall be tested by an independent laboratory for the parameters required, with the results submitted to the City of Baldwin on the original laboratory report sheets.

(2) All measurements, tests, and analyses of the characteristics of waters and wastes to which reference is made in this Ordinance shall be determined in accordance with the latest edition of "Standard Methods for the Examination of Water and Wastewater," published by the American Public Health Association, or in accordance with any applicable EPA testing procedure of general acceptance in the chemical testing industry, provided, however, that all such analyses shall be determined in accordance with the requirements of 40 CFR 136, which requirements shall prevail in the event of conflict.

Sec. VII. Significant Contributing Industries.

(a) General.

All Significant Contributing Industries (See definition of Significant Contributing Industry in Section II) that discharge wastewater effluent into the City of Baldwin Wastewater System shall comply with the following:

(b) Sampling Manhole.

In order to provide for accurate sampling and measurement of industrial wastes, each Significant Contributing Industry shall provide and maintain, on each of its industrial waste outlet sewers, a large manhole or sampling chamber to be located outside the plant. If inside the plant fence, there shall be a gate near the sampling manhole with a key furnished to the City. There shall be ample room provided in each sampling manhole to enable convenient inspection and sampling by the City, or its agent.

(c) Provision For Flow Monitoring.

Each Sampling Manhole shall contain a properly installed flow monitoring device such as a Parshall flume, Palmer-Bowlus flume, or other similar device as is approved by the City. Plans of the proposed sampling manhole and monitoring device shall be prepared by a registered engineer and submitted to the City of Baldwin for review and approval.

(d) Discharge Permit Required.

It shall be unlawful for any Significant Contributing Industry, as determined under this Ordinance, to discharge wastewater into the City of Baldwin Wastewater System without a City of Baldwin issued discharge permit.

Sec. VIII. Discharge Permits.

(a) General.

(1) All Significant Contributing Industries proposing to connect to or to contribute to the City of Baldwin Wastewater System shall obtain a wastewater discharge permit before connecting to or contributing to the City System.

(2) All existing Significant Contributing Industries connected to or contributing to the City of Baldwin Wastewater System shall obtain a wastewater discharge permit.

(b) Application.

When requested to do so by the City of Baldwin, all Significant Contributing Industries shall complete and file with the City an application in the form prescribed by the City and accompanied by a fee as set by the City from time to time. Existing users shall apply for a discharge permit within sixty (60) days of notification by the City that a discharge permit is required. Proposed new users shall make application not less than ninety (90) days prior to connecting to or contributing to the City of Baldwin Wastewater System. Each discharge permit shall be accompanied by a completed questionnaire as described in Section V.

(c) Permit Modifications.

(1) When a permitted industrial user has significantly changed circumstances that cause the conditions in its discharge permit to become inaccurate or unrepresentative, then and in that event, the industry shall apply to the City for

a permit modification. Such changed circumstances shall include significantly altered production practices or processes, plant expansions or reductions, modifications to pretreatment facilities, etc..

(2) Within nine (9) months of the promulgation of a Federal Pretreatment Standard, the discharge permit of users subject to such standards shall be revised to require compliance with such standard within the time frame prescribed by such standard. Where a user, subject to a Federal Pretreatment Standard, has not previously submitted an application for a wastewater discharge permit as required by subsection (b), the user shall apply for a wastewater discharge permit within one hundred eighty (180) days after the promulgation of the applicable Federal Pretreatment Standard. In addition, the user with an existing wastewater discharge permit shall submit to the City of Baldwin within one hundred eighty (180) days after the promulgation of an applicable Federal Pretreatment Standard the information required by paragraphs (h) and (i) of Section V.

(d) Conditions.

Wastewater discharge permits shall be expressly subject to all provisions of this Ordinance and all other applicable regulations, user charges and fees established by the City. Permits may contain the following:

(1) The unit charge or schedule of user charges and fees for the wastewater which is to be discharged by the permittee into the City of Baldwin Wastewater System.

(2) Limits on the average and maximum wastewater constituents and characteristics.

(3) Limits on average and maximum rate and time of discharge or requirements for flow regulations and equalization.

(4) Requirements for installation and maintenance of inspection and sampling facilities.

(5) Specifications for monitoring programs, which may include sampling locations, frequency of sampling, number, types and standards for tests and reporting schedule.

(6) Compliance schedules.

(7) Requirements for submission of technical reports or discharge reports.

(8) Requirements for maintaining and retaining plans and records relating to wastewater discharges as specified by the City, and affording the City access thereto.

(9) Requirements for notification of the City of any new introduction of wastewater constituents or any substantial change in the volume or character of the wastewater constituents being introduced into the City Wastewater System.

(10) Requirements for notification of accidental discharges as per Section XI.

(11) Other conditions as deemed appropriate by the City to ensure compliance with this Ordinance.

(e) Duration.

Permits shall be issued for a specified time period as determined by the City of Baldwin, not to exceed five (5) years. A permit may be issued for a period less than a year or may be stated to expire on a specific date. The user shall apply for permit reissuance a minimum of sixty (60) days prior to the expiration of the user's existing permit. The terms and conditions of the permit may be subject to modification by the City during the term of the permit as limitations or requirements as identified in subsection (c), above, are modified, conditions change, or other just cause exists. The user shall be informed of any proposed changes in his permit at least thirty (30) days prior to the effective date of change. Any changes or new conditions in the permit shall include a reasonable time schedule for compliance.

(f) Transfer.

Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. When approved by the City for transfer, any succeeding owner or user shall also comply with the terms and conditions of the existing permit.

(g) Suspension, Revocation or Denial.

(1) Procedure. When the City has reason to believe that any one of the conditions enumerated in subsection (2) below exists, he shall give

written notice thereof to the permittee. Said notice shall set forth the time and place where the charges shall be heard by the City. The hearing date shall not be less than fifteen (15) days from the mailing of such notice to the permittee at the address shown on the permit or at permittee's last known address. At the hearing, the permittee shall have an opportunity to refute the allegations set forth in the proposed permit revocation notice.

If after the hearing the City finds that any of the conditions hereinafter enumerated in subsection (2), below, exists, he shall have the right to suspend, revoke or deny the permit.

(2) Any of the following is reason for permit suspension, revocation or denial.

(i) Failure of a user to factually report the wastewater constituents and characteristics of his discharge.

(ii) Failure of the user to report significant changes in operations or wastewater constituents and characteristics.

(iii) Refusal of reasonable access to the user's premises for the purpose of inspection or monitoring.

(iv) Violation of permit requirements or Ordinance conditions.

(v) Failure to pay fees or charges established pursuant to Ordinance.

(vi) Failure to submit a Compliance Report following written notice form the City that such report is overdue.

(h) **Reporting Requirements.**

(1) Compliance Data Report: Within ninety (90) days following the date for final compliance with applicable pretreatment standards or, in the case of a new source, following commencement of the introduction of wastewater into the City wastewater system, any user subject to permit standards and requirements shall submit to the City a report indicating the nature and concentration of all pollutants in the discharge from the regulated process which are limited by discharge standards and requirements and the average and maximum daily flow for these process

units in the user facility which are limited by such standards or requirements. The report shall state whether the applicable discharge standards or requirements are being met on a consistent basis and, if not, what additional O&M and/or pretreatment is necessary to bring the user into compliance with the applicable standards or requirements.

This statement shall be signed by authorized representative of the industrial user and certified to by a qualified professional.

(2) Periodic Compliance Reports: All users who have been issued discharge permits are required to submit compliance reports at the intervals set forth in each user's individual permit.

The compliance reports shall address the discharge parameters and all other information indicated as being necessary to report as shown in the user's permit.

(3) If a permitted user fails to submit a Compliance Report in accordance with the reporting schedule contained in its permit, the City will provide written notice of the deficiency to the user. The written notice of deficiency will provide a time frame within which the late compliance report must be submitted to the City. The time frame for submittal of the late compliance report shall not be less than thirty (30) days nor more than ninety (90) days from the date of the notice of deficiency.

(4) All sampling and testing performed under this subsection for reporting requirements shall be conducted in accordance with Section VI.

(i) Confidential Information.

(1) Information and data obtained from reports, questionnaires, permit applications, permits, monitoring programs, and from inspections shall be available to the public or other governmental agency without restriction unless the user specifically requests and is able to demonstrate to the satisfaction of the City that the release of such information would divulge information, processes or methods of production entitled to protection as trade secrets of the user.

(2) When requested by the person furnishing a report, the portions of a report which might disclose trade secrets, or secret processes, shall not be

made available for inspection by the public. However, all information shall be made available upon written request to governmental agencies for uses related to this Ordinance or for other regulatory or enforcement purposes. All portions of such reports shall be available for use by the state or any state agency in judicial review or enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics will not be recognized as confidential information.

(3) Information accepted by the City as confidential shall not be transmitted to any governmental agency or to the general public by the City until and unless a ten-day notification is given to the user.

(j) Maintenance of Records:

(1) Sampling and Testing Records. Any permitted user subject to the reporting requirements established in Subsection (h), hereof, shall maintain records of all information resulting from any such monitoring activities. Such records shall include monitoring results for all samples:

(i) The date, exact place, method, and time of sampling and names of the person or persons taking the samples;

(ii) The dates analyses were performed;

(iii) The name of person(s) who performed the analysis;

(iv) The analytical techniques/methods used; and

(v) The results of such analyses.

(2) Monitoring Activities and Records of Results. Any permitted user subject to the reporting requirements established in Subsection (h), hereof, shall be required to retain for a minimum of three (3) years any records of monitoring activities and results (whether or not such monitoring activities are required by this Ordinance) and shall make such records available for inspection and copying by the City, State, or EPA. This period of retention shall be extended during the course of any unresolved litigation regarding the permitted user, or when requested by the City, State, or EPA.

Sec. IX. Industrial Pretreatment Facilities.

(a) Requirement for.

All users shall provide necessary wastewater pretreatment as required to comply with the limitations and provisions contained in this Ordinance and to achieve compliance with all Federal Categorical Pretreatment Standards within the time limitations as specified by the Federal Pretreatment Regulations. Any facilities required to pretreat wastewater to a level acceptable to the City shall be provided, operated and maintained at the user's expense. Detailed plans showing the pretreatment facilities and operating procedures shall be submitted to the City for review and shall be acceptable to the City prior to commencement of construction of the facility. The review of such plans and operating procedures will in no way relieve the user of the responsibility for modifying the facility as necessary to produce an effluent acceptable to the City under the produce an effluent acceptable to the City under the provisions of this Ordinance. Any subsequent changes in the pretreatment facilities or method of operation shall be reported to and be acceptable to the City prior to the user's initiation of the changes.

(b) Compliance Schedules.

The timing of construction and operation of pretreatment facilities as required hereby shall be in accordance with the compliance schedules provided by the City as described in Section VIII (d) (6); however, the City shall also have the authority to issue compliance schedules independent of the permitting process and such compliance schedules may be enforced by the City.

(c) Maintenance of Pretreatment Facilities.

All wastewater pretreatment facilities shall be properly and adequately maintained by the user so as to achieve the intended purpose of the facilities.

Sec. X. Sand and Oil/Grease Interceptors.

(a) Requirement for.

(1) All users involved in the preparation of food for commercial purposes shall provide oil/grease interceptors or traps. Additionally, any user who generates a wastewater which contains greater than the quantity of oil and grease regulated under Section III, and provided that the excess oil and grease is floatable and can be

effectively removed in oil/grease interceptor or trap, then said user will be required to install a grease/oil interceptor.

(2) All users whose wastewater stream is associated with unusually large quantities or grit, sand or gravel shall be required to install a sand trap. All car/truck wash systems shall be required to install sand traps.

(3) The requirements of this Ordinance section shall not apply to private living quarters or dwelling units.

(b) Design Criteria.

(1) For restaurants and other eating establishments.

All sand and oil/grease interceptors used in conjunction with restaurants or other eating establishments shall have a capacity of 15 gallons per seat, except that no grease trap shall be smaller than 750 gallons nor larger than 3000 gallons.

(2) For facilities other than eating establishments.

All sand and oil/grease interceptors used in conjunction with facilities other than eating establishments shall have a capacity that will provide not less than ten (10) minutes nor more than thirty (30) minutes retention time at the peak eight (8) hour flow rate. Flow through velocities shall not exceed one foot per second at the peak eight (8) hour flow rate.

(c) Maintenance.

All grease, oil and sand interceptors or traps shall be maintained by the user at his expense, in continuously efficient operating at all times.

In the maintaining of these interceptors, the owner shall be responsible for the proper removal and disposal by appropriate means of the captured materials, and shall maintain records of the dates, and means of disposal which are subject to review by the City. The frequency of removal shall be such as to ensure that no overflows of oil, grease or sand into the wastewater system ever results.

(d) Proper Disposal of collected Materials.

Under no circumstances shall the collected materials ever be returned to the wastewater system.

Sec. XI. Accidental Discharges.

(a) Protection Against.

Each Significant Contributing Industry shall provide protection from accidental discharge of prohibited materials or other substances regulated by this Ordinance. Additionally, any person or industry which handles hazardous wastes, any priority pollutant as shown on the EPA list, or any prohibited materials shall, upon the request of the City of Baldwin, provide proof of protection from accidental discharge of hazardous wastes, priority pollutants, or prohibited materials. Facilities to prevent accidental discharge of prohibited materials shall be provided and maintained at the owner's or user's own cost and expense. Detailed plans showing facilities and operating procedures to provide this protection shall be submitted to the City for review, and shall be approved by the City before construction of the facilities All existing users shall complete such a plan within ninety (90) days after the effective date of this Ordinance. Construction shall be completed within one hundred eighty (180) days of approval of plans by the City. No Significant Contributing Industry who commences contributing to the City of Baldwin Wastewater System after the effective date of this Ordinance shall be permitted to introduce pollutants into the system until accidental discharge procedures and facilities (if required) have been approved by the City. Review and approval of such plans and operating procedures shall not relieve the user from the responsibility to modify the user's facility as necessary to meet the requirements of this Ordinance.

(b) Oral Notice to City.

In the case of an accidental discharge, it is the responsibility of the user to immediately telephone and notify the City of Baldwin of the incident. The notification shall include location of discharge, type of waste, concentration and volume, and corrective actions taken.

(c) Written Notice to City.

Within five (5) days following an accidental discharge, the user shall submit to the City of Baldwin a detailed written report describing the cause of the discharge and the measures to be taken by the user to prevent similar future occurrences. Such notification shall not relieve the user of any expense, loss, damage, or other liability which may be incurred as a result of damage to the City of Baldwin Wastewater Facilities,

fish kills, or any other damage to person or property; nor shall such notification relieve the user of any fines, civil penalties, or other liability which may be imposed by this article or other applicable law.

(d) Notice to Employees.

A notice shall be permanently posted on the user's bulletin board or other prominent place advising employees whom to call in the event of an accidental discharge to occur are advised of the emergency notification procedure.

Sec. XII. High Strength Wastewater Surcharge

(a) Establishment of.

All users discharging "high strength" wastewater into the City of Baldwin Wastewater System shall be assessed a monetary surcharge, in addition to the normally required sewer use charges, in an amount to be calculated as shown below. A "high strength" wastewater is defined as wastewater which contains BOD and TSS in excess of the below shown concentrations:

(1) Five day, 20°C biochemical oxygen demand (BOD) of 300 milligrams per liter (mg/l).

(2) Total suspended solids (TSS) of 300 mg/l.

The above parameters shall be determined by the utilization of the sampling and testing procedures as provided in Section VI.

(b) Formula.

When the concentrations of the surcharged parameters shown above exceed the values of the constituents as set forth in subsection (a), above, the excess concentrations shall be subject to a surcharge in the amount derived in accordance with the following formula:

$$\frac{P \times G \times 8.34 \times C}{1000} = \$/\text{month}$$

Where:

"P" is equal to the concentration in mg/l of the parameter being evaluated (BOD or TSS) which is in excess of the amounts shown in subsection (a), above.

"G" is equal to the user's monthly water consumption in thousands of gallons as determined from the user's monthly water meter readings.

"8.34" is a conversion factor.

"C" is equal to the unit cost in dollars per pound ($/lb) for the treatment of the surcharged parameters. This value shall be established by the City and revised from time to time as necessary.

(c) Quantitative Measurement of Surchargable Parameters.

The measurement of the surcharge parameters (BOD and TSS) shall be conducted as follows:

(1) The City shall sample and test the user as provided in Section VI once per year, except that the duration of the sampling to determine surcharge shall be for a period of not less than three (3) calendar days.

(2) The City need not provide any prior notice to the industry with regard to the sampling period.

(3) The City may sample the user as often as desired at the City's expense if, in the opinion of the City, representative samples have not been previously obtained.

(4) If in the opinion of the user, the samples taken by the City are not representative of the user's typical wastewater, then the user may request a resampling. At the user's request, the City shall grant the user not more than two (2) resamplings per year. All user requested resampling shall be done at the user's expense. A reasonable cost shall be charged to the user by the City therefor.

Sec. XIII. City's Right to Monitor Nondomestic Users to Confirm Compliance.

The City of Baldwin shall have the right and authority to enter upon any industrial user's premises for the purpose of observation, flow monitoring, wastewater sampling or for any other reasonably necessary purpose to confirm the user's compliance with the provisions of this Ordinance. The City of Baldwin may, but is not required to, provide the user with prior notice of the entry.

Sec. XIV. Violations.

The failure of any person to comply with any provision contained in this Sewer Use Ordinance shall be a violation

which shall be enforced in accordance with the penalties and provisions as set forth hereafter.

Sec. XV. Notice of Violation.

Any person found to be violating any provision of this Sewer Use Ordinance shall be provided with written notice stating the nature of the violation and providing a reasonable time limit for the satisfactory correction thereof.

The offender shall within the period of time stated in such notice, permanently cease all violation. Written notice personally delivered or placed in the U.S. Mail to the person's last known address shall be deemed sufficient notice under this section.

Sec. XVI. Revocation of Permit.

The City of Baldwin discharge permits issued in accordance with the provisions of Section VIII may be suspended, revoked or denied for any of the violations set forth in Section VIII (g).

Sec. XVII. Termination of Service; Lien Created by Nonpayment of Amounts Due; Interest on Amounts Due.

In order to enforce the operation of this Ordinance, the City of Baldwin shall have the power and authority to enter upon the property of any user who has violated any provision of this Ordinance following due notice of the violation to terminate the user's water and/or wastewater service in any manner deemed necessary and appropriate by the City. In the event of such termination under this section, the City shall retain all rights to collect unpaid bills or amounts owed by the terminated user according to law or other provision of this Ordinance. Such rates or charges, if not paid when due, shall constitute a lien upon the premises served. Past due amounts shall bear interest at the same rate as would unpaid ad valorem taxes.

Sec. XVIII. Civil Liabilities and Penalties.

Any person intentionally or negligently violates any provisions contained in this Ordinance, or who violates the conditions contained in any City of Baldwin issued discharge permit, or who violates any consent order, prohibition, discharge limitation, standard of performance, or pretreatment standard shall be liable civilly to the City of Baldwin. Said civil liability may be in a sum not to exceed ten thousand dollars ($10,000) for each day in which such violation occurs.

Sec. XIX. Injunctive Relief.

If any person violates the provisions of this Ordinance, Federal or State Pretreatment Requirements, or the provisions

of his discharge permit, the City of Baldwin may commence an action for appropriate legal and/or equitable relief including injunctive relief, in the appropriate Court of competent jurisdiction.

Sec. XX. Consent Orders.

Consent Orders may be utilized by the City to enforce the provisions contained in this Ordinance. A Consent Order may be issued to any person who violates any provisions of this Ordinance. The Consent Order shall be an agreement between the City of Baldwin and the person in violation that shall operate as follows:

(a) The City shall agree not to prosecute under the law relative to the particular violation or violations being considered if the terms and conditions of the Consent Order are complied with by the person in violation.

(b) A schedule including various terms and conditions, as necessary, for the person in violation to achieve compliance shall be provided.

(c) A monetary payment of an amount commensurate with the nature and magnitude of the violation may be stipulated in the Consent Order. This monetary payment shall be from the person in violation to the City of Baldwin and shall have the legal effect of consideration provided in exchange for the City's covenant not to sue or prosecute on the violation or violations stipulated in the Consent Order.

(d) Any party to any Consent Order shall agree that any such Consent Order may be filed with the Habersham County Superior Court along with pleadings seeking to make such Consent Order an order of the Superior Court and enforceable as such court order in any subsequent enforcement action which may be necessary.

Sec. XXI. Criminal Sanctions and Fines.

Any person who violates any of the terms or conditions of this Ordinance or who knowingly makes false statements, representations, certifications in any application or questionnaire, record, plan or other document or who falsifies, tampers with or knowingly renders inaccurate any monitoring device or method required under this ordinance shall be punished by payment of a fine of up to $500 or six months imprisonment for each offense.

Sec. XXII. Enforcement Actions Accumulative.

Except as otherwise provided, all of the enforcement provisions set forth herein are accumulative to any other

enforcement procedures or remedies which may be available to the City of Baldwin either by local or State law or by this Ordinance.

Sec. XXIII. Inconsistent or Conflicting Ordinances.

All ordinances and parts of ordinances in conflict herewith, to the extent of such conflict only, are hereby repealed.

Sec. XXIV. Separation Clause.

The invalidity of any section, clause, sentence, or provision of this Ordinance shall not affect the validity of any other part of this Ordinance which can be given effect without such invalid part or parts.

Sec. XXV. This Ordinance shall be in full force and effect from and after the date of its passage.

Adopted by the City Council of Baldwin, Georgia this _____ day of _____, 1993.

Mayor

Attest:

City Clerk

Councilman

Councilman

Councilman

Councilman

Councilman

0629-CD40:0008

ORDINANCE AMENDMENT

AN ORDINANCE TO AMEND THE WATER AND SEWER ORDINANCE ADOPTED APRIL 1, 19
AND JUNE 6, 1986 AND ALL AMENDMENTS HERETO. (WATER METER AND SEWER
CONNECTION FEES)

WHEREAS, the City of Baldwin, Baldwin, Georgia deem it necessary at this time to amend any prior ordinance setting forth WATER METER AND SEWER CONNECTION FEES. Due to the increase of the cost of water meters, labor and all materials essential to connect, it is imperative to increase the connection fees.

WHEREAS, the Mayor and Council from the City of Baldwin hereby set the connection fees as follows:

			INSIDE/OUTSIDE
1.	Water Meters - (Connection Fee)	3/4" line	300.00/450.00
		1" line	450.00/600.00
		2" line	300.00/450.00 plus meter cos

2.	Sewer Connection-		
		3/4" line	300.00/450.00
		1" line	450.00/600.00
		2" line	300.00/450.00

NOW, THEREFORE BE IT ORDAINED, by the Mayor and Council from the City of Baldwin, Baldwin, Georgia, the governing authority, that the above rates are hereby established and enforceable at this time.

This 11th day of May, 1992 First Reading
This day of June, 1992 Second Reading

Mayor Wayne Kelsey

Attest:

Paula DeLuca, City Clerk

(92-0-1009)

ORDINANCE AMENDMENT

AN ORDINANCE TO AMEND THE PRESENT WATER RECONNECTION FEES

WHEREAS, the City of Baldwin presently is charging water customers the amount of $10.00 in order that service may be reconnected after disconnection has occurred due to non-payment; and

WHEREAS, the Council has reviewed the fee schedule and feels it deemed necessary to increase the fee to $25.00 for all reconnections due to the current cost of gas and employee time used to disconnect and reconnect the meter; and

NOW THEREFORE BE IT ORDAINED that the Mayor and Council from the City of Baldwin, Georgia, have reviewed the present reconnection fees and feel compelled to increase the fee to $25.00. This Ordinance Amendment is hereby approved and shall be enforced.

This _____ day of May, 1993.

FIRST READING: _____

SECOND READING: _____

_____
MAYOR WAYNE KELSEY

_____
MAYOR PRO TEM ROBERT BOHANNON

ATTEST:

_____
PAULA DELUCA, CITY CLERK

FIRST READING _____

PUBLISHED _____

PASSED 4-8-96

AN ORDINANCE NO. 0029-6002-04-96

AN ORDINANCE TO AMEND THE WATER AND SEWER USE ORDINANCES FOR THE CITY OF BALDWIN, GEORGIA; TO PROVIDE FOR THE RATES FOR CONNECTIONS FOR WATER OR SEWER SERVICES, OR BOTH; TO PROVIDE AND PUBLISH THE CURRENT RATE OR FEE SCHEDULE FOR WATER OR SEWER SERVICES, OR BOTH; TO PROVIDE AND SET A WATER OR SEWER DEPOSIT FOR NEW USERS, OR WHEN SERVICE HAS BEEN DISCONNECTED FOR NONPAYMENT, AND IS RECONNECTED; TO PROVIDE THAT EACH CONSUMER OF WATER SERVICE FROM THE CITY OF BALDWIN SHALL RECEIVE AND PURCHASE A BACKFLOW VALVE AS REQUIRED BY FEDERAL LAW; AND FOR OTHER PURPOSES.

WHEREAS, the City Council of the Baldwin, Georgia is authorized by Art. IX, § II, ¶ III of the Constitution of the State of Georgia of 1983, and O.C.G.A. § 36-35-3 to provide water and sewer services by way of utilities owned and operated by the City of Baldwin;

WHEREAS, the City Council of the City of Baldwin, Georgia desires to document the current charges and rates as to water or sewer services, or both;

WHEREAS, the City Council of the City of Baldwin, Georgia, in order to comply with the federal requirements of the Safe Drinking Water Act, is required to have backflow valves for each consumer of water service, which necessitates a one-time charge for said backflow valves;

WHEREAS, the City Council of the City of Baldwin, Georgia desires to set water or sewer, or both, connection fees, and to

require a deposit for water or sewer, or both, services from the City of Baldwin, Georgia; and

BE IT ORDAINED by the City Council of Baldwin, Georgia, and it is hereby ordained by authority of the City Charter and the above-referenced authority, as amended:

Section 1. **AMENDMENT TO THE WATER OR SEWER USE ORDINANCES, OR BOTH.**

This ordinance shall amend the water or sewer use ordinances, or both, as provided by this ordinance, and which have been amended by proper ordinance, duly ordained on July 10, 1995.

Section 2. **WATER CONNECTION (AND METER) FEE AND SEWER CONNECTION FEE; BACKFLOW VALVE FEE.**

Section 2 of the July 10, 1995 amendment to the Water and Sewer Use Ordinances for the City of Baldwin, Georgia is hereby stricken in its entirety, and a new Section 2 is hereby adopted to read as follows:

Section 2. **WATER CONNECTION (AND METER) FEE AND SEWER CONNECTION FEE; BACKFLOW VALVE FEE.**

Each consumer subscribing to use the water service, or sewer service, or both, of the City of Baldwin, Georgia, shall pay the following connection fees (or backflow fee, or any combination thereof):

(a) For water service:

Size of Line	Within Corporate Limits	Without Corporate Limits
3/4-inch line	$450.00 (includes meter)	$550.00 (includes meter)
one-inch line	$550.00 (includes meter)	$700.00 (includes meter)

The connection is not a deposit, but is the connection fee to reimburse the City for its cost and expense for providing a service line, a meter, and labor. The meter shall remain the property of the City. Where the connection fee does not include the meter, then the consumer shall also pay for the cost of the meter. Any meter above one inch, or sewer connection above four-inch, or both, shall bear a connection fee as agreed to between the City, through its governing entity, the City Council of Baldwin, Georgia and the applicant.

(b) For sewer service:

Size of Connection	Within Corporate Limits	Without Corporate Limits
four-inch connection	$450.00	$550.00

(c) Backflow valve connection fee:

The Federal Safe Drinking Water Act mandates and requires that each consumer receiving water service from the City of Baldwin, Georgia, have a backflow valve to protect the integrity of the water system. The requirement of a backflow valve is required of all current consumers of water services of the City of Baldwin, and as to all future consumers of water services of the City of Baldwin. Therefore, the City of Baldwin, Georgia, is required by federal law to connect a backflow valve to the distribution line of each consumer. The cost for said backflow valve and its connection, including the charge for the valve itself, the other necessary materials to attach the valve, and the labor and equipment charges, has been determined by the City of Baldwin to be $30.00 for a 3/4-inch line. Therefore, each consumer of water services of the City of Baldwin, and each new consumer (having a

new tap-on and meter), shall be assessed with the one-time charge of $30.00 in order to obtain the mandated backflow valve and have said valve connected to the distribution line of the consumer. The backflow valve connection fee is not a deposit, but is the connection fee to reimburse the City for its costs and expense for providing a backflow valve and labor. The backflow valve shall remain the property of the City. For any line over 3/4-inch, the consumer shall bear and pay a backflow valve connection fee that shall reimburse the City of Baldwin, Georgia for its actual cost in obtaining the backflow valve to fit the larger line, and its actual labor and equipment charges for installing said backflow valve. All such backflow valves shall remain the property of the City.

Section 3. **CURRENT RATES FOR WATER AND SEWER SERVICE CHARGED BY THE CITY OF BALDWIN.**

Pursuant to Section 4 of the July 10, 1995 amendment to the Water and Sewer Use Ordinances for the City of Baldwin, Georgia, the City Council, on behalf of the City of Baldwin, may by proper resolution in a public meeting of the City Council adopt a new rate or fee schedule. Due to an increase in the cost of operating the water and sewer systems of the City of Baldwin, Georgia, the City Council, does hereby adopt a new rate or fee schedule by proper resolution. A copy of the new rate or fee schedule is attached to this ordinance and incorporated into this ordinance by reference thereto.

Section 4. **WATER OR SEWER SERVICE DEPOSIT, OR BOTH.**

Subparagraph (j) of the section entitled, "Miscellaneous Charges" of article II of the Water Ordinance of the City of

Baldwin provides that a deposit is required on all accounts at the time water service is connected. Due to mandated changes in the state law, the City of Baldwin may no longer hold the owner of the premises liable for charges incurred by an (non-owner) occupant of the premises. Therefore, in order that the City of Baldwin not lose funds due to the nonpayment of water services, or sewer services, or both, by any consumer, the City Council of the City of Baldwin, hereby modifies subparagraph (j) (with the remaining non-conflicting provisions to still be effective and valid) to require for each new account, or when an existing customer has his service cut-off for nonpayment and is then reconnected, for said customer or consumer to post with the City of Baldwin, Georgia, a deposit amount of $75.00. Only one charge of $75.00 shall be required per customer/consumer regardless of whether the consumer receives just water service, or sewer service, or both, unless the customer has his service terminated twice for nonpayment, in which event, a deposit charge of $150.00 shall be required. Said deposit may be used to pay all accrued charges owned to the City of Baldwin, Georgia for any service provided by the City of Baldwin, Georgia to said customer/consumer. Upon payment of all charges owed by the consumer/customer to the City of Baldwin, upon termination of service, and upon the return by the consumer/customer of any property that is owned by the City of Baldwin, or its agents such as the sanitary garbage container (can or cart), the City of Baldwin shall return the deposit to the customer/consumer (Note: this provision applies to all deposits held by the City of

Baldwin). Should the customer/consumer not pay any charge or assessment owed to the City of Baldwin, Georgia, then the City of Baldwin, Georgia may use said deposit to pay all charges and assessments owed by the consumer/customer to the City of Baldwin, Georgia (Note: this provision applies to all deposits held by the City of Baldwin).

Section 5. **REPEAL OF CONFLICTING ORDINANCES TO THE EXTENT OF THE CONFLICT.**

All parts of ordinances, and all ordinances, in conflict with the terms of this ordinance are hereby repealed to the extent of the conflict; but is hereby provided that any ordinance or law which may be applicable hereto and aid in carrying out and making effective the intent, purpose and provisions hereof, is hereby adopted as a part hereof and shall be legally construed to be in favor of upholding this ordinance on behalf of the City of Baldwin, Georgia.

Section 7. **SEVERABILITY.**

If any paragraph, subparagraph, sentence, clause, phrase, or any portion of this ordinance, should be declared invalid or unconstitutional by any Court of competent jurisdiction or if the provisions of any part of this ordinance as applied to any particular situation or set of circumstances should be declared invalid or unconstitutional, such invalidity shall not be construed or affect the portions of this ordinance not so held to be invalid, or the application of this ordinance to other circumstances not so held to be invalid. It is hereby declared to be the intent of the City Council of the City of Baldwin to provide for separate and divisible parts, and it does hereby

RATE SCHEDULE

(a) All water furnished by the City of Baldwin to users or property situated within or without the corporate limits shall be metered and computed monthly and paid for at the following rates:

Within the Corporate Limits

0-2,000 gallons	$7.00 minimum
Over 2,000 gallons	$3.00 per 1,000 (or any part thereof)

Without the Corporate Limits

0-2,000 gallons	$15.00 minimum
Over 2,000 gallons	$3.00 per 1,000 (or any part thereof)

(b) All sewer service furnished by the City to users or property situated within or without the corporate limits shall be computed monthly and paid for as follows:

Within the Corporate Limits

0-2,000 gallons	$7.00 minimum
Over 2,000 gallons	$3.00 per 1,000 (or any part thereof)

Without the Corporate Limits

0-2,000 gallons	$15.00 minimum
Over 2,000 gallons	$3.00 per 1,000 (or any part thereof)

Sewer usage (and billing) shall be determined at One Hundred (100%) percent of water (used and) billed.

adopt any and all parts hereof as may not be held invalid for any reason.

This 8th day of April, 1996.

BALDWIN CITY COUNCIL

By: _____
Councilperson

Delores G. Thomas
Councilperson

John Thomas
Councilperson

Robert L. Bohannon
Councilperson

Curtis Thomas
Councilperson

Mark E. Reed
Mayor

Attest:

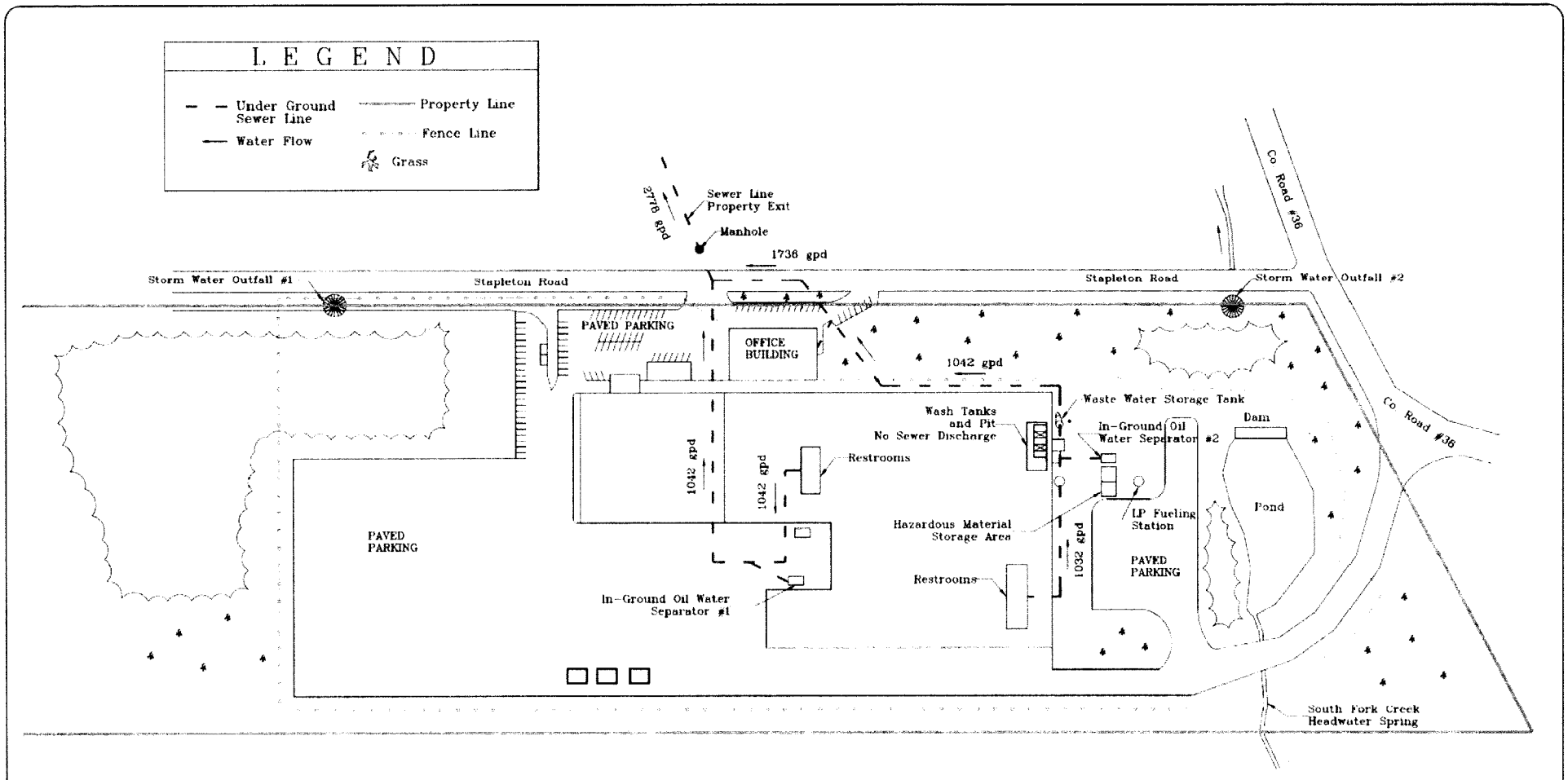
Paula J. De Luca
City Clerk

1825-35/d:24555

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

APPENDIX B



Drawn by: JSIII	Checked by: JSIII	Habersham Metal Products Co., Inc.	Project Name: HMPCO - Sewer Line Diagram Flow Balance
Date: 2-3-17	Page: 1 of 1	Engineered Steel Doors and Frames 264 Stapleton Rd Cornelia, GA 30531 (706)778-2212 FX: (706)778-2769 e-mail: hmpco@habershammetal.com	Job Number:
Scale:			

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

APPENDIX C

HABERSHAM METAL PRODUCTS DIP CLEANING TANKS

Habersham Metal Products has a five stage system designed to clean and treat metal parts and products manufactured at Habersham Metal Products. The system consists of 5 tanks, each measuring 144 inches long, 60 inches wide and 96 inches deep. The total capacity of each tank is 3,590.6 gallons; although, the actual volume will be less since the tanks are never filled to the top. The actual volume can be calculated by measuring the depth of the liquid, in inches, and multiplying by 37.4 gallons. A diagram of the system is located in the appendix.

1.0 Dip Tank #1

1.1 Description

1.1.1 This dip tank is designed to wash the oils and "dirt" from our parts and products.

1.1.2 The chemical used to "charge" this tank is Oakite, Inpro-Clean #3800.

1.1.3 The pH of the liquid mixture is 10.0 making it an alkali. This chemical can be corrosive and damage skin and clothing.

1.1.4 The liquid mixture is heated and maintained at 140 degrees F.

1.2 "Dumping" Schedule

1.2.1 This tank is emptied, "dumped", approximately every 3 months into the holding tank located outside of the building. Dumping time will vary depending upon the amount of liquid in the holding tank.

1.2.2 The holding tank is 120 inches in diameter and 101 inches deep at the fill pipe. The capacity of the holding tank, filled to the bottom of the pipe, is 4,943.45 gallons.

1.3 "Dumping" Procedure

When dumping tank #1 the following procedure must be followed:

1.3.1 All liquid must be pumped into the holding tank.

1.3.2 Make sure the holding tank is empty enough to except all the liquid.

1.3.3 Close valve #6.

1.3.4 Open valve #7.

1.3.5 Open valve #1.

Note! This valve is locked, get key from the supervisor.

1.3.6 Engage air driven pump.

1.3.7 Monitor flow from #1 tank into the holding tank.

1.3.8 When all liquid from #1 has been pumped into the holding tank disengage the pump and close valve #1.

1.3.9 Close valve #7.

1.3.10 All sediment and "trash" must be collected for drying.

Note! Dip tanks are considered a confined space and require **only** authorized employees with a permit to enter.

1.4 Disposal

The disposal of waste water into the Publicly Owned Treatment Works **(POTW)** is regulated by the city of Baldwin and EPA and should be conducted **only** by a qualified individual.

1.4.1 Once tank #1 is pumped into the holding tank, the pH is adjusted to a range of 7 to 9.

1.4.2 A sample is taken, along with a composite sample of tanks 2 and 4, and sent to a lab and tested for total zinc.

1.4.3 The lab sends the results to Rindt McDuff who notifies us of the disposal rate in gallons per day (GPD).

1.4.4 If the disposal rate is greater than 90 GPD, open valve #9 and adjust valve #8 to the proper flow rate.

1.4.5 If the disposal rate is less than 90 GPD, open valve #9 and adjust the metering pump to the proper flow rate.

Note! Because of suspended solids, the flow rate needs to be monitored to ensure valve blockage does not occur.

2.0 Dip Tank #2 and #4

2.1 Description

2.1.1 These tanks are designed to rinse the parts and products after dipping in tank 1 or 3.

2.1.2 The tanks contain city water that is constantly flowing at a rate of 4 gallons per minutes (GPM).

2.1.3 City water flows into #4 at the top then through a pipe at the bottom of #4 to the bottom of #2 and overflows at the top of #2 into the POTW.

2.2 Dumping Schedule

2.2.1 Tanks #2 and 4 are dumped only when cleaning is necessary.

2.2.2 These tanks should never be dumped when the holding tank is being emptied to the POTW.

2.2.3 The total zinc must be determined before dumping into the POTW.

2.3 Dumping Procedure:

2.3.1 Insure that the holding tank is empty or not being emptied to the POTW.

2.3.2 Close valve #11.

2.3.3 Open valve #6.

2.3.4 Open valves #2 and/or 4.

Note! These valves are locked, get key from the supervisor.

2.3.5 Engage air driven pump.

2.3.6 Pump into the POTW at a rate not to exceed 4 GPM.

2.3.7 When all liquid has been pumped from the tank (s) disengage air driven pump and close valves 2, 4 and 6.

2.3.8 Open valve #11.

Note! Dip tanks are considered a confined space and require **only** authorized employees with a permit to enter.

2.4 Zinc Too High

2.4.1 If the total zinc is determined to be too high, tank #2 or #4 must be pumped to the holding tank for metering to the POTW.

2.4.2 Follow dumping procedures for tank #1.

3.0 Dip Tank #3

3.1 Description

3.1.1 This tank is designed to add a phosphorizing (rust inhibitor) coat to the parts and products.

3.1.2 The chemical used to "charge" this tank is Oakite, 747.

3.1.3 The pH of the liquid mixture is 5.5 making it an acid. This chemical can be corrosive and damage skin and clothing.

3.1.4 The liquid mixture is heated and maintained at a temperature of 140 degrees F.

3.2 Dumping Schedule

3.2.1 This tank is emptied, "dumped", approximately every 3 months into the holding tank located outside of the building. Dumping time will vary depending upon the amount of liquid in the holding tank.

3.2.2 The holding tank is 120 inches in diameter and 101 inches deep. At the fill pipe the capacity of the holding tank, filled to the bottom of the pipe is 4,943.45 gallons.

3.3 Dumping Procedure

When dumping tank #3, the following procedure must be followed:

3.3.1 All liquid must be pumped into the holding tank.

3.3.2 Make sure the holding tank is empty enough to accept all the liquid.

3.3.3 Close valve #6.

3.3.4 Open valve #7.

3.3.5 Open valve #3.

Note! This valve is locked, get the key from the supervisor.

3.3.6 Engage air driven pump.

3.3.7 Monitor flow from #3 tank into the holding tank.

3.3.8 When all liquid from #3 has been pumped into the holding tank disengage pump and close valve #3.

3.3.9 Close valve #7.

3.3.10 All sediment and "trash" must be collected for drying.

Note! Dip tanks are considered a confined space and require **only** authorized employees with a permit to enter.

3.4 Disposal

The disposal of waste water into the Publicly Owned Treatment Works (POTW) is regulated by the City of Baldwin and EPA and should be conducted **only** by a qualified individual.

3.4.1 Once tank #3 is pumped into the holding tank, the pH is adjusted to a range of 7 to 9.

3.4.2 A sample is taken, along with a composite sample of tanks 2 and 4, and sent to a lab and tested for total zinc.

3.4.3 The lab sends the results to Rindt McDuff who notifies us of the disposal rate in GPD.

3.4.4 If the disposal rate is greater than 90 GPD, open valve #9 and adjust valve #8 to the proper flow rate.

3.4.5 If the disposal rate is less than 90 GPD, open valve #9 and adjust metering pump to proper flow rate.

Note! Because of suspended solids, flow rate needs to be monitored to insure valve blockage does not occur.

4.0 Dip Tank #5

4.1 Description

4.1.1 This dip tank is designed to add a paint adhesive coat to our parts and products.

4.1.2 The chemical used to "charge" this tank is Oakite, Ultra-Seal.

4.1.3 The pH of the liquid mixture is 8.5 making it a base.

4.1.4 The liquid mixture is heated and maintained at a temperature of 150 degrees F.

4.2 "Dumping" Schedule

4.2.1 This tank is emptied, dumped, approximately every 3 months into the holding tank located outside of the building. Dumping time will vary depending upon the amount of liquid in the holding tank.

4.2.2 The holding tank is 120 inches in diameter and 101 inches deep at the fill pipe. The capacity of the holding tank, filled to the bottom of the pipe, is 4,943.45 gallons.

4.3 "Dumping" Procedure

When dumping tank #5 the following procedure must be followed:

4.3.1 All liquid must be pumped into the holding tank.

4.3.2 Make sure the holding tank is empty enough to except all the liquid.

4.3.3 Close valve #6.

4.3.4 Open valve #7.

4.3.5 Open valve #5.

Note! If this valve is locked, get key from the supervisor.

4.3.6 Engage air driven pump.

4.3.7 Monitor flow from #5 tank into the holding tank.

4.3.8 When all liquid from #5 has been pumped into the holding tank, disengage the pump and close valve #5.

4.3.9 Close valve #7.

4.3.10 All sediment and "trash" must be collected for drying.

Note! Dip tanks are considered a confined space and require **only** authorized employees with a permit to enter.

4.4 Disposal

The disposal of waste water into the Publicly Owned Treatment Works **(POTW)** is regulated by the city of Baldwin and EPA.

4.4.1 Once tank #5 is pumped into the holding tank, the pH is adjusted to a range of 7 to 9.

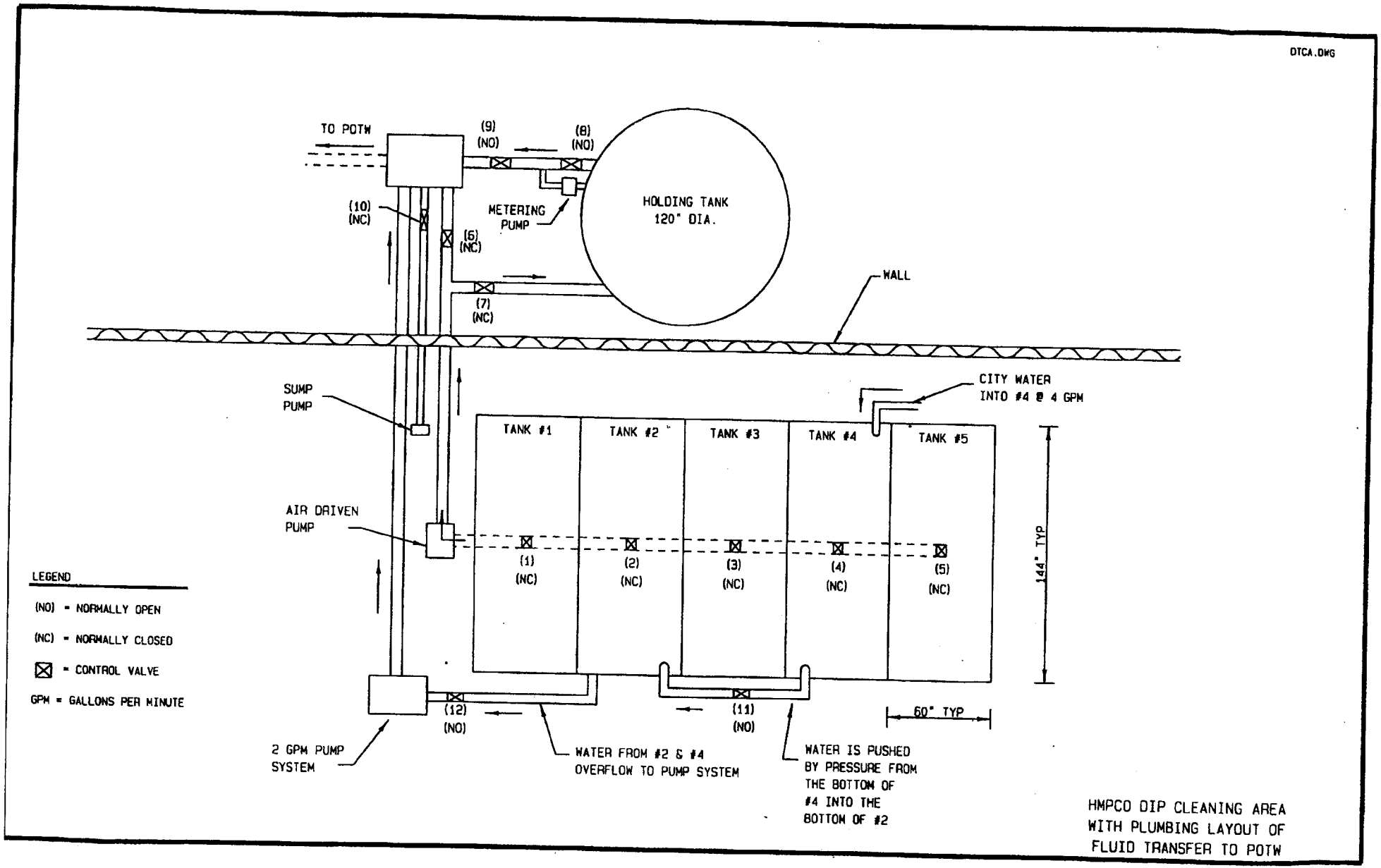
4.4.2 A sample is taken, along with a composite sample of tanks 2 and 4, and sent to a lab and tested for total zinc.

4.4.3 The lab sends the results to Rindt McDuff who notifies us of the disposal rate in GPD.

4.4.4 If the disposal rate is greater than 90 GPD, open valve #9 and adjust valve #8 to the proper flow rate.

4.4.5 If the disposal rate is less than 90 GPD, open valve #9 and adjust the metering pump to the proper flow rate.

Note! Because of suspended solids, the flow rate needs to be monitored to ensure valve blockage does not occur.



HMPCO DIP CLEANING AREA
WITH PLUMBING LAYOUT OF
FLUID TRANSFER TO POTW

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

APPENDIX D

Dip Cleaning Tanks Policy/Procedure

For

Habersham Metal Products

Description of the Tanks, Dumping Schedule, Dumping Procedures, and Disposal Procedure

M16.DCTP.1.L2
Rev. 1, 5-2013

Habersham Metal Products Dip Cleaning Tanks System

System Overview:

Habersham Metal Products has a five stage system designed to clean and treat metal parts and products manufactured at Habersham Metal Products. The system consists of 5 tanks, each measuring 144 inches long, 60 inches wide, and 96 inches deep. The total capacity of each tank is 3,590.6 gallons; although, the actual volume will be less since the tanks are never filled to the top. The actual volume can be calculated by measuring the depth of the liquid, in inches, and multiplying by 37.4 gallons. A diagram of the system is located in the appendix.

Parts and products are run through the system as follows:
Tank #1 is a chemical detergent, which removes dirt, oil, and grease.
Tank #2 is a clean water rinse which is used to remove excess soap suds and dirt left behind from Tank #1.
Tank #3 contains a phosphate treatment which reacts with the steel surface to produce an iron phosphate coating (Conversion Coating)
Tank #4 is a clean water rinse which is used to remove excess soap suds and dirt left behind from Tank #3
Tank #5 is a final rinse agent, which helps with water run-off and drying time.

Note! The disposal of rinse water into the Publicly Owned Treatment Works (POTW) is regulated by the City of Baldwin and the EPA and should be conducted only by a qualified and authorized individual. Only Tank #2 and Tank #4 spray rinse water may be discharged into the city sewer.

Procedure:

1.0 Dip Tank #1

1.1 Description

1.1.1 This dip tank is designed to wash the oils and "dirt" from our parts and products.

1.1.2 The chemical used to "charge" this tank is Houghton, Houghto-Clean #8150.

1.1.3 The pH of the liquid mixture is 9.0 to 11.0 making it an alkali. This chemical is a very high strength industrial detergent and can be corrosive and damage skin and clothing.

1.1.4 The liquid mixture is heated and maintained at 145 to 160 degrees F.

1.2 "Dumping" Schedule

1.2.1 This tank is emptied, "dumped" approximately 1 time per year into the holding tank located outside of the building. Houghton comes by and completes a chemical survey on a periodic basis to determine dumping schedule. Dumping time will vary depending upon the amount of liquid in the holding tank. Tank #1 wastewater may also be pumped directly out of the dip tank by the wastewater hauling contractor (Environmental Remedies LLC) instead of pumping the wastewater into the outside holding tank.

1.2.2 The holding tank is 120 inches in diameter and 101 inches deep at the fill pipe. The capacity of the holding tank, filled to the bottom of the pipe is 4,943.45 gallons.

1.3 "Dumping" Procedure

When dumping tank #1 the following procedure must be followed:

1.3.1 Make sure the gas fired heater is turned off.

1.3.2 All liquid must be pumped into the holding tank.

1.3.3 Make sure the holding tank is empty enough to except all the liquid.

1.3.4 Close valve #6

1.3.5 Open valve #7

1.3.6 Connect flexible hose to the air driven pump #1 and to valve #1 (Proper gloves must be worn)

1.3.7 Open valve #1

1.3.8 Engage air driven pump #1

1.3.9 Monitor flow from #1 tank into the holding tank.

1.3.10 When all liquid from #1 tank has been pumped into the holding tank disengage the air driven pump #1 and close valve #1.

1.3.11 Disconnect the flexible hose from valve #1 (Proper gloves must be worn)

1.3.12 Close valve #7

1.3.13 All sediment and trash must be collected for drying.

Note! Dip tanks are considered a confined space and require only authorized associates with a permit to enter.

1.4 Disposal Procedure

The disposal of waste water from the holding tank is done by an outside source (Environmental Remedies LLC). The sourced company pumps the contents of the holding tank or dip tanks into a tanker truck and disposes of the waste according to strict EPA guide lines. The tanker truck connects their suction hose to the holding tank suction drain connection or drops their suction hose directly into the tank.

2.0 Dip Tank #2 and #4

2.1 Description

2.1.1 These tanks are designed to rinse the parts and products after dipping in tank #1 or #3.

2.1.2 Both tanks contain high pressure spray tips that are directed in an overlapping pattern. Both tanks are supplied by city water from the fresh water holding tank.

2.1.3 Parts and products are lowered into the tanks, a pedal is mashed and the pieces are rinsed off for a preset length of time.

2.2 "Dumping" Schedule

2.2.1 Tanks #2 and #4 are pumped directly to the POTW (city sewer) on a continuous basis. Only rinse water from Tank #2 and Tank #4 may be discharged to the city sewer system.

2.2.2 Valves #2 and #4 are normally open and are connected to air driven pump #2. This pump should be engaged at all times during tank operation.

2.2.3 Disengage the air driven pump #2 when tanks are not in use.

2.3 "Dumping" Procedure

2.3.1 Insure that valves #2 and #4 are open.

2.3.2 Insure that air driven pump #2 is engaged.

2.3.3 Disengage air driven pump #2 when tanks are not in use.

Note! Dip tanks are considered a confined space and require only authorized associates with a permit to enter.

2.4 Disposal Procedure

Disposal is straight to the POTW (city sewer).

3.0 Dip Tank #3

3.1 Description

3.1.1 This tank is designed to add a phosphorizing (rust inhibitor) coat to the parts and products.

3.1.2 The chemical used to "charge" this tank is Houghton, Houghto-Prep ZP3.

3.1.3 The pH of the liquid mixture is 4.5 to 5.5 making it an acid. This chemical can be corrosive and damage skin and clothing.

3.1.4 The liquid mixture is heated and maintained at a temperature of 110 to 130 degrees F.

3.2 "Dumping" Schedule

3.2.1 This tank is emptied, "dumped" approximately 1 time per year into the holding tank located outside of the building. Houghton comes by and completes a chemical survey on a periodic basis to determine dumping schedule. Dumping time will vary depending upon the amount of liquid in the holding tank. Tank #3 wastewater may also be pumped directly out of the dip tank by the wastewater

hauling contractor (Environmental Remedies LLC) instead of pumping the wastewater into the outside holding tank.

3.2.2 The holding tank is 120 inches in diameter and 101 inches deep at the fill pipe. The capacity of the holding tank, filled to the bottom of the pipe is 4,943.45 gallons.

3.3 "Dumping" Procedure

When dumping tank #3 the following procedure must be followed.

3.3.1 Make sure the gas fired heater is turned off.
3.3.2 All liquid must be pumped into the holding tank.
3.3.3 Make sure the holding tank is empty enough to except all the liquid.
3.3.4 Close valve #6
3.3.5 Open valve #7
3.3.6 Connect flexible hose to the air driven pump #1 and to valve #3 (Proper gloves must be worn)
3.3.7 Open valve #3
3.3.8 Engage air driven pump #1
3.3.9 Monitor flow from #3 tank into the holding tank.
3.3.10 When all liquid from #1 tank has been pumped into the holding tank disengage the air driven pump #1 and close valve #3
3.3.11 Disconnect the flexible hose from valve #3 (Proper gloves must be worn)
3.3.12 Close valve #7
3.3.13 All sediment and trash must be collected for drying.

Note! Dip tanks are considered a confined space and require only authorized associates with a permit to enter.

3.4 Disposal Procedure

The disposal of waste water from the holding tank is done by an outside source (Environmental Remedies LLC). The sourced company pumps the contents of the holding tank or dip tank into a tanker truck and disposes of the waste according to strict EPA guide lines. The tanker truck connects their suction hose to the holding tank suction drain connection or drops there suction hose directly into the tank.

4.0 Dip Tank #5

4.1 Description

4.1.1 This dip tank is designed as a rinsing aid to our parts and products.
4.1.2 The chemical used to "charge" this tank is Houghton, Houghto-LuPrep 601.
4.1.3 The liquid mixture in this tanks is basically water. (approximately 3000 gallons of water to 1 gallon of chemical)
4.1.4 The liquid mixture is heated and maintained at a temperature of 125 to 140 degrees F.

4.2 "Dumping" Schedule

4.2.1 This tank is emptied, "dumped" approximately 1 time per year into the holding tank located outside of the building. Houghton comes by and completes a chemical survey on a periodic basis to determine dumping schedule. Dumping time will vary depending upon the amount of liquid in the holding tank. Tank #5 wastewater may also be pumped directly out of the dip tank by the wastewater hauling contractor (Environmental Remedies LLC) instead of pumping the wastewater into the outside holding tank.

4.2.2 The holding tank is 120 inches in diameter and 101 inches deep at the fill pipe. The capacity of the holding tank, filled to the bottom of the pipe is 4,943.45 gallons.

4.3 "Dumping" Procedure

When dumping tank #5 the following procedure must be followed:

4.3.1 Make sure the gas fired heater is turned off.
4.3.2 All liquid must be pumped into the holding tank.
4.3.3 Make sure the holding tank is empty enough to except all the liquid.
4.3.4 Close valve #6
4.3.5 Open valve #7
4.3.6 Connect flexible hose to the air driven pump #1 and to valve #5 (Proper gloves must be worn)
4.3.7 Open valve #3
4.3.8 Engage air driven pump #1
4.3.9 Monitor flow from #5 tank into the holding tank.

4.3.10 When all liquid from #1 tank has been pumped into the holding tank disengage the air driven pump #1 and close valve #5

4.3.11 Disconnect the flexible hose from valve #5 (Proper gloves must be worn)

4.3.12 Close valve #7

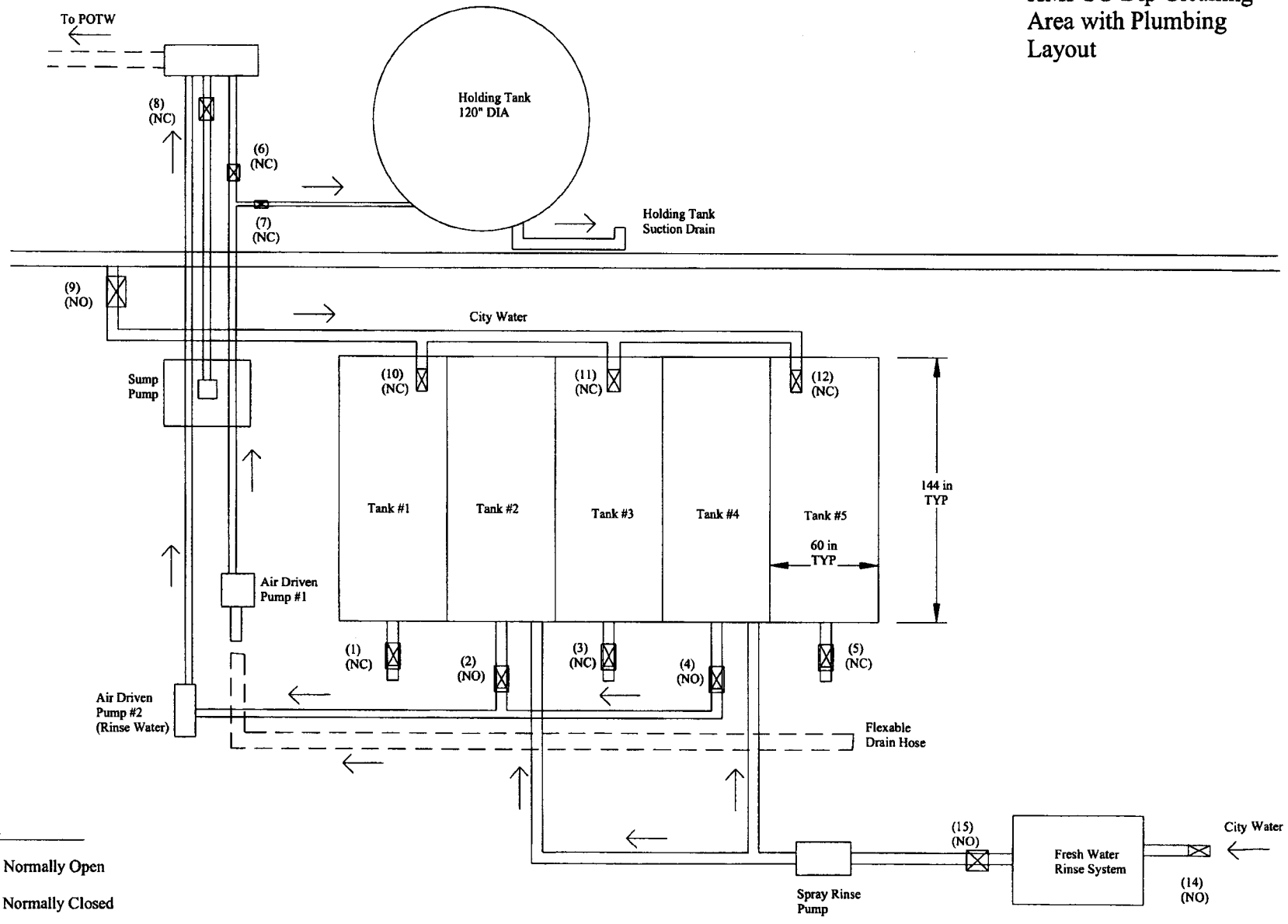
4.3.13 All sediment and trash must be collected for drying.

Note! Dip tanks are considered a confined space and require only authorized associates with a permit to enter.

4.4 Disposal Procedure

The disposal of waste water from the holding tank is done by an outside source (Environmental Remedies LLC). The sourced company pumps the contents of the holding tank or dip tank into a tanker truck and disposes of the waste according to strict EPA guide lines. The tanker truck connects their suction hose to the holding tank suction drain connection or drops their suction hose directly into the tank.

HMPCO Dip Cleaning Area with Plumbing Layout



Legend

(NO) = Normally Open

(NC) = Normally Closed

⊠ = Control Valve

M16.DCTP.1.L2
Rev.1, 5-2013

BLANK PAGE

#5

Habersham Metal Products Company
264 Stapleton Road • Cornelia, GA 30531
Phone: (706) 778-2212 • Fax: (706) 778-2769 • www.habershammetal.com

Ms. Connie Raines
U. S. Environmental Protection Agency, Region 4
NPDES Permitting and Enforcement Branch
Atlanta Federal Center
61 Forsyth Street, S. W.
Atlanta, GA 30303-8960

Previously submitted electronically on February 3, 2017.

Dear Ms. Raines:

I certify under 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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the 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 knowing violations.

Sincrely,

James A. Stapleton, Jr.
Chairman and CEO

Enclosure

ISO 9001:2008
NAAMM MEMBER

BLANK PAGE

#6

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 1 2 2016

CERTIFIED MAIL 7011 3500 0003 2064 3636
RETURN RECEIPT REQUESTED

Habersham Metal Products Company
ATTN: Mr. James A. Stapleton Jr., PE
264 Stapleton Road
P.O. Box 739
Cornelia, Georgia 30531-5643

Re: Notice of Violation and Opportunity to Show Cause Pursuant to Section 309 of the Clean Water Act (CWA), 33 U.S.C. § 1319, and Information Request Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, for Habersham Metal Products Company, Cornelia, Habersham County, Georgia.

Dear Mr. Stapleton:

On September 30, 2015, the U.S. Environmental Protection Agency Region 4 performed an industrial pretreatment reconnaissance inspection of Habersham Metal Products Company's facility (Facility) located at 264 Stapleton Road, Cornelia, Habersham County, Georgia. The purpose of the inspection was to evaluate Habersham Metal Products Company's compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); the regulations promulgated thereunder at 40 C.F.R. Part 403; and the State of Georgia Rules for Water Quality Control, Chapter 391-3-6.

The EPA's inspection, as described in the inspection report enclosed herewith as Enclosure A, and subsequent investigative efforts have revealed that Habersham Metal Products Company failed to comply with Section 301 of the CWA, 33 U.S.C. § 1311, and its implementing pretreatment regulations at 40 C.F.R. Part 403 and the (State) State of Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6. Specifically, the EPA hereby notifies Habersham Metal Products Company, pursuant to Section 309(a) of the CWA, 33 U.S.C. § 1319(a), of the following findings of violations:

1. Significant industrial user discharge without a valid pretreatment permit.

   The Facility is a significant industrial user, as defined by 40 C.F.R. § 403.3(v). The Facility is therefore required to obtain a valid permit from the delegated pretreatment Control Authority, which is the State, prior to discharging to the City of Baldwin's publicly owned treatment works (POTW). See: State of Georgia Rule 391-3-6-.08; and 40 C.F.R. §§ 403.10(e) and 403.8(f)(1)(iii).

   The Facility has discharged to the POTW, which does not hold a State-approved pretreatment program. The facility has been discharging without a valid significant industrial user permit from the State for approximately 31 years, from 1985 to 2016.

2. New Source failure to install and operate pretreatment equipment prior to discharge.

   Pursuant to 40 C.F.R. § 403.6(b), the Facility is subject to the federal categorical pretreatment standards in 40 C.F.R. Part 433. The Facility is a new source, as defined in 40 C.F.R. § 403.3(m), because its regulated operations originated after the EPA published proposed standards for Part 433 on August 31, 1982. Habersham Metal Products Company was thus required to install, and have in operating condition, all the pollution control equipment necessary to meet applicable Pretreatment Standards, including those in 40 C.F.R. Part 433, prior to beginning discharge to the POTW.

   The Facility did not install such necessary pollution control equipment prior to beginning discharge of regulated wastewater to the POTW in 1985 and has not installed such equipment. Thus the Facility has continued to discharge to the POTW without the necessary pollution control equipment, in continuing violation of 40 C.F.R. § 403.6(b).

3. Failure to report/record initial compliance with categorical standards.

   Within 90 days after commencing a discharge to a POTW, a new source is required to report and maintain record of the self-monitoring information on its compliance with standards, per 40 C.F.R. §§ 403.12(d), 403.12(g), 403.12(l) and 403.12(o).

   Ninety days after commencing discharge to the POTW in 1985 the Facility did not submit a report to the State of its initial compliance with the pretreatment standards in 40 C.F.R. § 433.17. The Facility has also not maintained the required record demonstrating its initial compliance with these pretreatment standards.

4. Failure to submit periodic reports on continued compliance with categorical standards.

   Pursuant to 40 C.F.R. §§ 403.12(e), 403.12(g), 403.12(l) and 403.12(o), any industrial user subject to categorical pretreatment standards must submit to [Control Authority], and maintain its own records of, additional periodic compliance reports at least twice a year on its compliance with categorical standards and other information. From 1985 until the present, the Facility has not submitted to State, or maintained its own records of, self-monitoring reports of compliance with 40 C.F.R. § 433.17.

Until compliance with the CWA is achieved, Habersham Metal Products Company is considered to be in violation of the CWA and may be subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

The EPA is continuing to investigate Habersham Metal Products Company's compliance with the CWA. Therefore, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, the EPA hereby requests that Habersham Metal Products Company provide the information set forth in Enclosure B within **twenty-one (21)** calendar days of your receipt of this letter.

Habersham Metal Products Company's response should be submitted to:

Attn: Ms. Connie Raines
U.S. Environmental Protection Agency, Region 4
NPDES Permitting and Enforcement Branch
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Failure to provide a full and complete response to this information request or to adequately justify a failure to respond within the time frame specified above may result in an EPA enforcement action pursuant to federal law, including, but not limited to Section 309 of the Clean Water Act, 33 U.S.C. § 1319, and 18 U.S.C. § 1001.

If Habersham Metal Products Company believes that any of the requested information constitutes confidential business information, it may assert a confidentiality claim with respect to such information, except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure C.

The EPA also requests that representatives of Habersham Metal Products Company contact the EPA within **seven (7) business days** of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against Habersham Metal Products Company for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. Habersham Metal Products Company should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial information which may reflect an inability to pay a penalty. Habersham Metal Products Company has the right to be represented by legal counsel.

All information submitted in response to this information request and/or during the show cause meeting must be accompanied by the following certification that is signed by a duly authorized official in accordance with 40 C.F.R. § 403.12(l):

> "I certify under 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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the 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 knowing violations."

Please be aware that the EPA may use information provided during the meeting or telephone conference and/or in response to this information request in any enforcement proceeding related to this matter. Failure to schedule a show cause meeting may result in a unilateral enforcement action against Habersham Metal Products Company. Notwithstanding the scheduling of a show cause meeting, the EPA retains the right to bring further enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

In addition, the Securities and Exchange Commission (Commission) requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist Habersham Metal Products Company, the EPA has also enclosed a document entitled *Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings*.

Please contact Ms. Connie Raines at (404) 562-9671 to arrange a show cause meeting or if you have any questions or concerns. Legal inquiries should be directed to Ms. Carol Baschon, Attorney Advisor, at (404) 562-9528.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosures

cc: Mr. Bert Langley
Georgia Environmental Protection Division

Final Report

Habersham Metal Products Company

Industrial User Pretreatment Reconnaissance Inspection

September 30, 2015

Prepared for:

EPA Region 4

61 Forsyth Street, S.W.

Atlanta, GA 30303-8960

Prepared by:

PG Environmental, LLC

607 10th Street; Suite 307

Golden, CO 80401-5817

Table of Contents

I. Introduction 3
II. Entry 3
III. Opening Conference 3
IV. Tour of Operations 4
V. Records Review 8
VI. Closing Conference 9
VII. Findings 10
VIII. Recommendations 11
IX. Attachments 13
END OF REPORT 86

I. Introduction

On September 30, 2015, PG Environmental, LLC (hereinafter, PG) conducted a pretreatment reconnaissance inspection of the Habersham Metal Products Company facility (hereinafter, Habersham or facility) on behalf of the U.S. Environmental Protection Agency (EPA) Region 4. The facility's location and mailing address are the same: 264 Stapleton Road; Cornelia, GA 30531. The facility does not have an industrial user discharge permit from either the State of Georgia Environmental Protection Division (State of Georgia) or the City of Baldwin; however, publicly available information about the facility suggested a potential need for coverage under a control mechanism. The State of Georgia was notified in advance of the pretreatment reconnaissance inspection activity pursuant to its Memorandum of Agreement with the EPA.

The facility is located in a rural area within Habersham County and consists of two large warehouse facilities and an administrative office building. The facility is located at latitude and longitude 34.501549 and -83.556888, respectively.

II. Entry

On behalf of EPA Region 4, PG Inspector, Ms. Kettie Holland, arrived at the facility at 1:56 P.M. and informed the facility's administrative staff of the reason for her visit and the purpose of the inspection. She asked whom the appropriate person would be to meet with to discuss facility operations and potential wastewater generating operations. Ms. Holland then met with Mr. Jim Stapleton, the Director of Research and Development Testing, and Mr. Ronald Lewallen, the Safety and Operations Support Specialist (jointly referred to as facility representatives). Introductions were exchanged and Ms. Holland provided a preliminary explanation of the purpose of the inspection.

III. Opening Conference

The facility representatives and Ms. Holland proceeded to Mr. Stapleton's office on the upper level of the administrative building. Ms. Holland presented her inspection credentials and provided a full explanation of the purpose and intent of the reconnaissance compliance inspection. Ms. Holland requested that the facility representatives provide a description of the facility's onsite operations and wastewater generating processes. The facility representatives explained that the company began operations at the facility in 1974, and that the facility's 120,000 square-foot production area was added between 1985 and 1986, which the facility representatives term the "Annex Building."

The facility representatives continued to explain the facility's operations and process flow from raw materials to finished product. The facility representatives stated that the facility receives sheet metal and conducts sheering, punching, bending, welding, washing, and painting of the sheet metal to produce various strengths and designs of hollow doors, metal frames, and detention wall panel systems. The facility representatives further explained that the facility conducts a metal washing operation of the metal frames prior to spray applying a solvent-based primer, "Kem-Kromik" to the frames. The facility generates and discharges untreated wastewater

from its metal frame washing operation to the City of Baldwin's (City's) publicly owned treatment works (POTW). The facility representatives stated that air compressor condensate is also generated and pretreated using an oil and water separator prior to discharging the wastewater to the City's POTW.

During initial discussions with the facility representatives regarding the facility's processes and permits, Mr. Stapleton provided Ms. Holland with a binder used for maintaining material safety data sheets (MSDS) for the various chemicals used in the metal frame washing process. Mr. Stapleton also mentioned that the facility has a storm water permit and an air permit issued by the State of Georgia in addition to a storm water pollution prevention plan.

Mr. Stapleton stated that the facility does not hold any federal, state, or local government wastewater discharge permits. He also mentioned that in the past, the facility had received visits from Aaron Akemon, the Wastewater Treatment Plant Manager from the City of Baldwin Wastewater Treatment Plant (WWTP). The facility representatives explained that Mr. Akemon had visited the facility approximately 6 months to a year prior to this inspection in an effort to determine the source of detergents that may have attributed to foaming at the WWTP.

IV. Tour of Operations

Ms. Holland accompanied the facility representatives on the inspection of the facility's process area, which takes place in the Annex Building and Process Warehouse on the property. The facility representatives stated that there are no plans for facility expansions or significant changes in processes in the near future.

Annex Building

The facility representatives explained that raw materials within the Annex Building consist of different types of mild and stainless steel sheet metal. The facility representatives explained that the process area is primarily utilized as a research and development (R&D) area where experimental processes using bullet-proof, sound-proof, and hurricane-resistant materials are tested for use in final products utilized in detention and high-security facilities. The facility representatives mentioned that approximately 90 percent of their work is to support government entities on the local, state, and federal levels.

The facility representatives stated that a portion of the process area is also used to process slider tracks and panels for housing, typically used in detention facilities. The panels used in this process may either be stacked and shipped or assembled and shipped to the customer. Panel manufacturing also takes place in the main Process Warehouse of the facility. The facility representatives also stated that a separate part of the process area is used for machining intricate parts that go into the doors. This area of the facility also housed a spray booth used for wet painting operations. The facility representatives explained that floor drains were not located within the spray booth, which was confirmed by Ms. Holland's observations.

Process Warehouse

The facility representatives explained that the majority of the metal cutting, bending, and welding takes place in this area of the facility. The Process Warehouse is further divided into two process areas: one for door and panel manufacturing and the other for metal frame manufacturing.

Door and Panel Manufacturing

The facility representatives and Ms. Holland began the inspection of the process area at the door and panel manufacturing area of the facility. The facility utilizes a TruLaser 3030 for cutting the sheet metal to produce the initial shape of the product. The facility then utilizes a GIGAbend bending machine to bend the metal to the desired shape for the panels prior to assembly, welding, and further process operations. The facility employees then weld the cut sheet metal and the bent metal pieces together to form a "stiffener", which is a necessary part for the door and panel products manufactured at the facility.

The facility representatives explained that they also utilize a number of robot welders to weld the seams between the cut sheet metal and the bent metal pieces. The part then goes through what the facility representatives refer to as a "finishing process." During this process, the rough edges of the part are grinded and smoothed to remove oils and impurities. Parts of the door or panel are then covered with cardboard to prevent specific parts of the door from being painted, per desired specifications. The door and panel parts are then hung on overhead hooks and are introduced to the painting booth. In the painting booth, a PC105 prime coat is applied to the products used in detention facilities. The painted parts are then introduced to an oven where the paint dries on the product. The final product is then packaged on the line and is loaded on a trailer for shipping to the specific customer.

Within the central area of the Process Warehouse is what the facility representatives refer to as the "parts department." This area of the facility contains a punching machine which is used to produce the internal parts of the doors, frames, and panels manufactured at the facility. The parts department primarily utilizes an Amada punching machine for manufacturing the internal parts at the facility.

Metal Frame Manufacturing

The facility representatives explained that near the central area of the process warehouse was the "dividing line" where the steel frame production process begins and is separated from the door and panel production area. The steel sheet metal is introduced to a punching machine where the "pocket frame" is produced by cutting out the jam frame where the hinges will be applied. After the punching process, the metal goes through a bending process which is performed using one of six brake presses. The metal is bent into a specific shape depending upon the engineered plan for the frame. The seams of the frame are then spot welded to reinforce the closures for the final product. The facility representatives stated that the facility takes the semi-assembled frames, hangs them on overhead hooks, and sends them through the metal frame washing process prior to applying the Kem-Kromik paint to the frame.

The facility representatives explained that after the frame has been attached to an overhead hook and crane system, which is mechanically operated, it is introduced into the first dip tank, which the facility representatives term "tank #1." This tank contains the HOUGHTO-CLEAN 8150 solution which contains hexylene glycol and sodium carbonate and has a capacity of 3,500 gallons (refer to Attachment 1, Photograph 1). The facility representatives explained that the solution has a concentration of between 3.0 to 4.5 percent of the HOUGHTO-CLEAN 8150 chemical and is to be maintained at a temperature range between 145 and 160 degrees Fahrenheit. The frame is dipped into the tank for a duration of approximately four minutes prior to being moved to the second stage of the five-stage frame washing process (refer to Attachment 1, Photograph 2).

The facility representatives explained that after the metal frame has been dipped in tank #1, it is moved to the first rinse process in which the frame is suspended in the first stage rinse cell (refer to Attachment 1, Photograph 3). The cell is equipped with a number of spray nozzles that sprays the frame with pressurized City water. The wastewater generated from the rinse process is collected in the bottom of the cell and drains to the lower-level area under the tanks, which was designed as a secondary containment structure for the tanks. The rinse wastewater is pumped to the facility's sewer connection, which discharges to the POTW.

The facility representatives explained that the rinse tanks are operated by a foot pump. Specifically, once a frame has been suspended in the cell, the foot pump is pressed and the pressurized water is sprayed onto the metal frame, rinsing off residual product from the tank #1 dip process. The facility representatives explained that when the foot pump is activated, it causes pressurized water to discharge from the nozzles for 20 seconds. The facility representatives explained that the facility receives water from the City, pressurizes the water, and stores it in a tank with a capacity of approximately 400 gallons.

The facility representatives explained that the two spray-rinse stages of the rinse process functioned as dip rinse tanks at an unidentified time in the past. Specifically, instead of spray applying the rinse water used in the second and fourth stage of the process, the facility dipped the metal frames into rinse tanks. The facility representatives stated that when the facility had dip rinse tanks, they would discharge the wastewater from the tanks to an equalization tank and ultimately to the POTW at a rate of approximately 2 gallons per minute (gpm). The facility representatives stated that in the past, a representative of the POTW and facility representatives discovered that the dip rinse tank process allowed zinc to accumulate within the rinse tanks, which was then discharged to the POTW. The City requested that the facility modify its process so that the zinc would not accumulate and be discharged to the POTW. In response to this request, the facility representatives stated that the dip rinse tanks were removed and the spray application rinse system was installed.

The facility representatives explained that during the third stage of the wash process, the metal frame is dipped into what the facility representatives refer to as "tank #3." This tank has a capacity of 3,500 gallons and contains a solution with a range of 1.25 to 3.25 percent of the HOUGHTO-PREP ZP-3 chemical solution (refer to Attachment 1, Photograph 4). The chemical used in the solution contains inorganic fluoride, nitric acid, and phosphoric acid, according to the

chemical MSDS. The facility representatives explained that the solution is to be maintained at a temperature range between 110 and 130 degrees Fahrenheit. The frame is to be dipped into the tank for a duration of approximately two minutes prior to being moved to the fourth stage of the five-stage wash process (refer to Attachment 1, Photograph 5).

The facility representatives explained that the fourth stage of the five-stage wash process involves another rinse cycle, similar to that of the second stage of the process. Again, pressurized water provided by the City from the 400-gallon tank is activated by a foot pump and is spray-applied to the metal frame to rinse the residual HOUGHTO-PREP ZP-3 chemical solution from the metal. As with the second stage of the wash, the rinse water from the process drains from the bottom of the cell to the lower-level area of the facility where it is pumped to the facility's sewer connection and discharged to the POTW (refer to Attachment 1, Photograph 6).

The facility representatives explained that during the final stage of the five-stage metal washing process, the metal frame is dipped into what they refer to as "tank #5." This tank has a capacity of 3,500 gallons and contains the HOUGHTO-LuPREP 601 chemical solution, which contains the alkaline solvent triethanolamine (TEOA) (refer to Attachment 1, Photograph 7). The facility representatives explained that approximately 16 ounces of the chemical must be added to the tank every two weeks. The solution is to be maintained at a temperature range between 125 and 140 degrees Fahrenheit and the metal frame is to be dipped into the tank for the duration of approximately 30 seconds (refer to Attachment 1, Photograph 8). After the frame has been removed from tank #5 it is allowed to dry. The frames then go through a finishing process, similar to that of the doors and panels, in which the edges of the frames are grinded and an auto body filler may be applied and removed. The frames are then hung and introduced to a spray booth where they are spray painted. The frames are allowed to dry and are packaged and shipped to various customers.

The facility representatives mentioned that the facility employees conduct tests of the dip tanks to ensure that they are of the quality needed to properly wash the metal frames. The facility employee conducts a total alkalinity titration test for tank #1 and a ZP3 titration test for tank #3. The facility employee records the temperature for tank #5. The facility maintains a "cleaning tank data sheet" and also records the percent concentration according to the titration test, pH, and temperature of the tank (refer to Attachment 1, Photograph 9).

As a component of the inspection, Ms. Holland requested to inspect the lower-level secondary containment area where the wastewater from the rinsing process is collected and pumped to the POTW. Ms. Holland and the facility representatives did not walk through the area due to the significant accumulation of rinse water on the ground of the lower-level area (refer to Attachment 1, Photograph 10). The facility representatives explained that the drains within the rinse cells are hard-piped to a pump with a catch filter and are then pumped to a 55-gallon drum that collects wastewater. The wastewater is then pumped from the drum and discharged to the facility's sewer connection.

Ms. Holland inspected the 55-gallon drum from an overhead view and asked additional questions regarding the drum, pump, and wastewater collected on the floor. After further investigation, the

facility representatives stated that the wastewater was no longer pumped from the 55-gallon drum to the sewer connection but instead was pumped directly from the rinse cells to the facility's sewer connection. Mr. Lewallen explained that the wastewater collected on the floor of the secondary containment area was due to a pump. He went on to explain that the wastewater was pumped utilizing a pump with a catch filter, which was missing a gasket, thus causing the wastewater to leak from the pump and collect within the secondary containment area of the facility (refer to Attachment 1, Photographs 10 and 11). After the pump with the catch filter, the wastewater is pumped via hard-pipe to the facility's sewer connection, located outdoor of the Process Warehouse building (refer to Attachment 1, Photograph 12). Ms. Holland did not observe any flow monitoring equipment for the discharge pipe.

Ms. Holland noted that a holding tank was located outside, in the near vicinity of the facility's sewer connection. The facility representatives explained that the holding tank was once used to store wastewater when the facility had rinse dip tanks. Wastewater collected in the holding tank would be discharged to the City's POTW at a rate of approximately 2 gpm. The facility representatives stated that the tank is no longer utilized and that they plan to remove it from the facility.

Remaining Process Areas

The facility representatives and Ms. Holland continued with the inspection throughout the remaining areas of the facility. The facility representatives pointed out the facility's oil and water separator used to pretreat the condensate from the facility's air compressor, located within a building separate from the other process areas. The facility representatives explained that the oil and water separator is a two-stage separator and that air compressor condensate flows from the first stage (located at the east) to the second stage, and to the facility's sewer connection which discharges to the City's POTW (refer to Attachment 1, Photographs 13 through 15). The facility representatives removed the covers to the two-stage oil and water separator.

The facility representatives explained that the hazardous waste storage area was covered and located outside on a concrete pad. Ms. Holland observed that the hazardous waste collected within the area mainly consisted of 5-gallon buckets of Pro-cryl, an acrylic primer and waste oil (refer to Attachment 1, Photograph 16).

The facility representatives also explained that an area of the facility was once used for truck washing. The facility representatives explained that truck washing hadn't occurred at the facility in a long time and that the area was now used for staging and truck loading.

V. Records Review

During the opening conference, Ms. Holland requested to review and obtain copies of the MSDSs for the chemicals used in the metal frame washing process. The following documents were provided to Ms. Holland by the facility representatives:

- MSDS

- Tank #1—HOUGHTO-CLEAN 8150 (active components: hexylene glycol and sodium carbonate)
- Tank #3—HOUGHTO-PREP ZP-3 (active components: inorganic fluoride, nitric acid, and phosphoric acid)
- Tank #5—LuPREP 601 (active components: Triethanolamine)

- Analytical Environmental Services, Inc. analytical report for samples collected on April 17, 2014 from tank #1, tank #3, and tank #5.
- Facility's City of Baldwin sewer/water bills for May, June, and July 2015.
- Non-hazardous waste manifest/certificate of disposal dated June 11, 2012.

The facility representatives explained that approximately once every three months a representative from the chemical provider, Houghton Chemicals visits the facility and tests the solution within the dip tanks. According to the test results, Houghton notifies the facility representatives if more chemicals need to be added to the dip tanks or if they need to be diluted with water. The facility representatives stated that, in the past, they did not use Houghton Chemicals and had to have the dip tank solutions hauled offsite by Environmental Remedies, LLC on a more frequent basis. Since the facility switched to Houghton Chemicals in 2012, the dip tank solutions haven't needed to be hauled offsite as often. According to the documents provided by the facility representatives, the facility has not contracted with a company to haul the content of the dip tanks offsite since June 2012.

Ms. Holland asked if there were any other records for a more recent hauling event for the solution dip tanks or if the facility had discharged the solution to the sewer. The facility representatives responded that the hauling records provided were the most recent and that they had not discharged the content from the chemical dip tanks to the POTW. Ms. Holland requested that in the event that the facility discovered additional waste hauling and disposal records for the dip tanks that they provide her with these documents via email.

After the onsite inspection, the facility representative provided the following documents to Ms. Holland per her request:

- Non-hazardous waste manifest/certificate of disposal dated March 12, 2010.
- Non-hazardous waste manifest/certificate of disposal dated March 24, 2010.
- Non-hazardous waste manifest/certificate of disposal dated May 17, 2010.
- Non-hazardous waste manifest/certificate of disposal dated July 27, 2010.
- Non-hazardous waste manifest/certificate of disposal December 29, 2010.

VI. Closing Conference

After the inspection of the process and operation areas, the facility representatives and Ms. Holland returned to the office where the opening conference had occurred. Ms. Holland explained that the facility did generate and discharge wastewater to the POTW and may need to receive a permit from the State of Georgia. Ms. Holland mentioned that any final compliance determinations would be communicated by the EPA to the facility.

VII. Findings

A. The facility generates and discharges wastewater associated with the metal frame washing process and air compressor condensate to the City's POTW. Since the facility utilizes a phosphoric acid solution to chemically etch the metal prior to painting, it performs categorical operations generating wastewater that is discharged to the POTW and is thus subject to the federal regulations at 40 C.F.R Part 433, Metal Finishing. In addition, the facility performs several ancillary operations listed at 40 C.F.R § 433.10(a), including metal welding, bending, and grinding, although these ancillary operations do not generate wastewater.

   In addition to the metal finishing standards, the pretreatment standards and requirements identified in 40 C.F.R Part 403, General Pretreatment Regulations for Existing and New Sources of Pollution, also apply to the facility's non-domestic discharges to the public sewer. Upon discharge to the POTW, the facility did not: (1) previously install the pretreatment necessary to meet standards pursuant to 40 C.F.R. § 403.6(b); (2) submit to the State of Georgia (its pretreatment control authority) the initial and routine reporting for categorical users pursuant to 40 C.F.R. § 403.12; and (3) obtain a significant industrial user permit from the State of Georgia pursuant to law.

B. Ms. Holland observed a hazardous waste drum stored in the Annex Building, which was used for the collection of paint thinner. The drum was labeled as containing hazardous waste and was not stored in the vicinity of a floor drain.

C. The housekeeping in the area housing the frame metal washing process was in need of improvement. Wastewater from the rinse cells was observed accumulated on the floor of the secondary containment area, which housed various debris including abandoned pipes and other miscellaneous equipment.

D. Ms. Holland observed that the tests recorded in the cleaning tank data sheet appeared to be conducted on a daily basis (excluding weekends) according to the information recorded on the data sheet. However, Ms. Holland noted that, for the later portion of August, the dates were recorded as follows: August 19, 28, 21, 24, 25, and 26. It was unclear why the sequence of the dates were inconsistent and not recorded in chronological order. Ms. Holland also noted that the majority of the information recorded on the data sheet was identical to the information recorded on the previous day. However, the temperature for tank #1 appeared to range between 150 and 170 degrees Fahrenheit.

E. During the inspection of the two-stage oil and water separator located outside of the compressor building, Ms. Holland observed that a dark oil sheen on the surface of the wastewater collected in the first stage of the oil and water separator. Ms. Holland also observed floating solids and absorbent material applied to the wastewater within the second stage of the oil and water separator.

F. During the review of the non-hazardous waste hauling records, the most recent hauling event occurred on June 11, 2012. Prior to this hauling event, the facility provided documentation that the dip tanks had been collected and hauled from the facility on a frequency from twice per month to once every five months. Although the facility representatives stated that their recent switch to Houghton Chemicals has resulted in the baths not requiring change-out as frequently. The documentation providing the frequency at which the tanks are being hauled offsite is of concern.

G. During the inspection of the metal frame washing process, Ms. Holland and Mr. Lewallen had a discussion regarding the amount of wastewater generated and discharged from the rinse stages of the process. Ms. Holland and Mr. Lewallen estimated that approximately 40 gallons of water were used for the two rinse cycles, and that approximately 40 frames would be washed in a day, providing an estimate of approximately 1,600 gallons of wastewater generated from the process per day, meaning that approximately 32,000 gallons of wastewater would be generated and discharged to the POTW from the process per month. This estimation does not include domestic wastewater discharges or discharges from the air compressor condensate.

VIII. Recommendations

A. Due to the activities that are subject to regulation, it is strongly recommended that the facility take the appropriate steps to ensure that it has received an industrial user permit before continuing to discharge its wastewater to the City's POTW. Specifically, it is recommended that the facility continue to work closely with the City and to contact the State of Georgia's Environmental Protection Division to obtain the proper permits for the facility's operations and associated discharges. The facility should improve tracking of its dip tank hauling events.

B. It is recommended that the facility repair the leaking pump gasket at the metal frame rinse process area and ensure that other aspects of the system are properly operating to ensure proper housekeeping and wastewater management at the facility. It is also recommended that the facility regularly service the oil and water separators on the property to ensure that wastewater is not discharged from the facility of a quality that may have a negative impact on the operation of the POTW.

C. It is recommended that the facility obtain and correctly install a flow measurement device to identify the volume of wastewater generated and discharged from its regulated categorical wastewater operations prior to the introduction of any diluting wastestreams. It is also recommended that the facility work with the State of Georgia's Environmental Protection Division to determine the necessity of installing an effluent pH meter or other measurement devices to ensure that the wastewater does not cause harm to the POTW or cause pass

through, interference, and/or upsets at the treatment facility or in any other way cause the City to violate its own discharge permit.

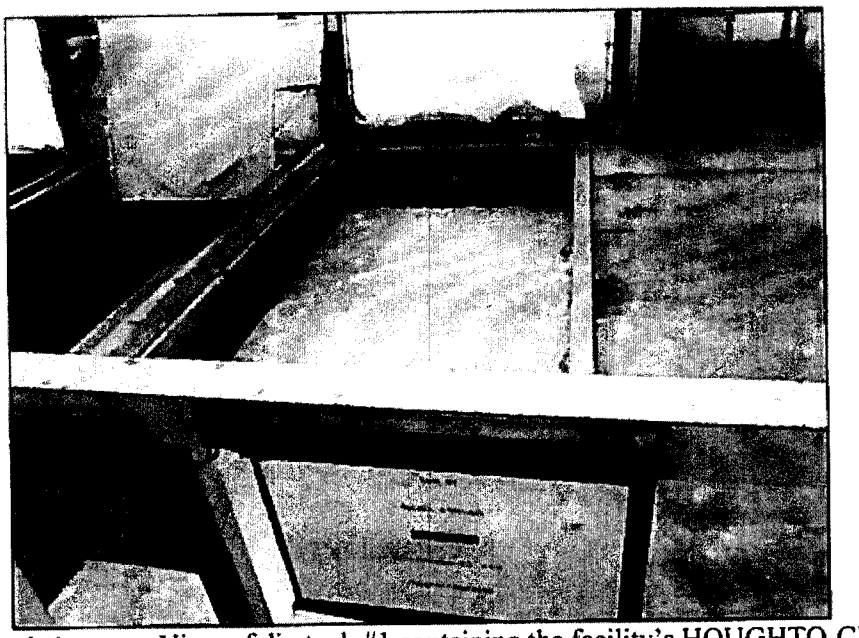
IX. Attachments

Attachment 1	Habersham Metal Products Co. Photograph Log
Attachment 2	MSDSs for Dip Tanks
Attachment 3	Analytical Results from Dip Tank Testing
Attachment 4	Non-hazardous Waste Hauling and Disposal Manifests

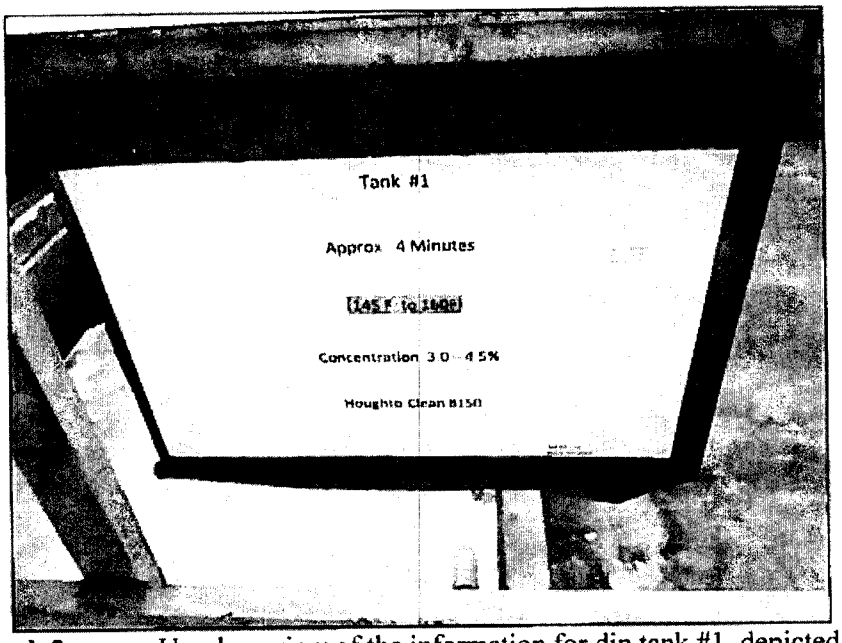
Attachment 1

Habersham Metal Products Company

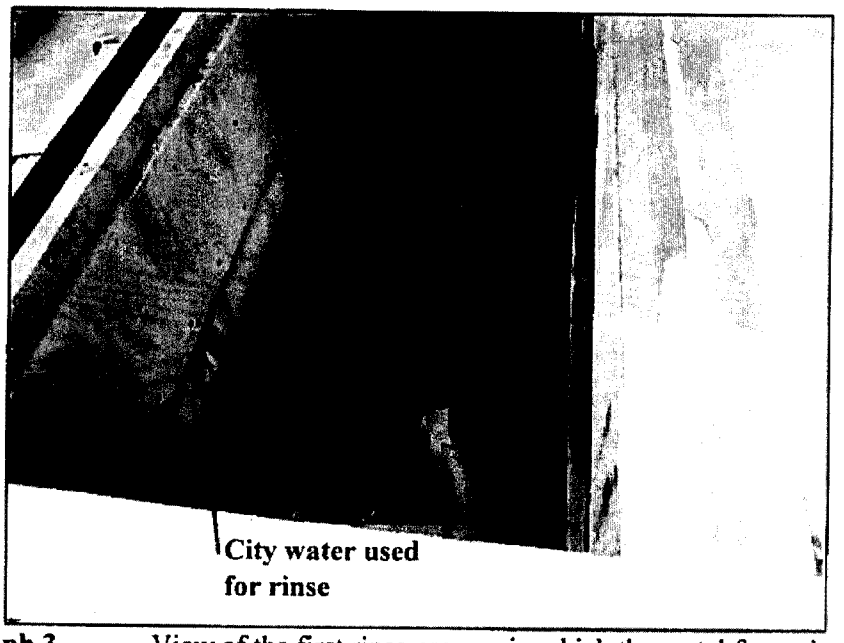
Photograph Log



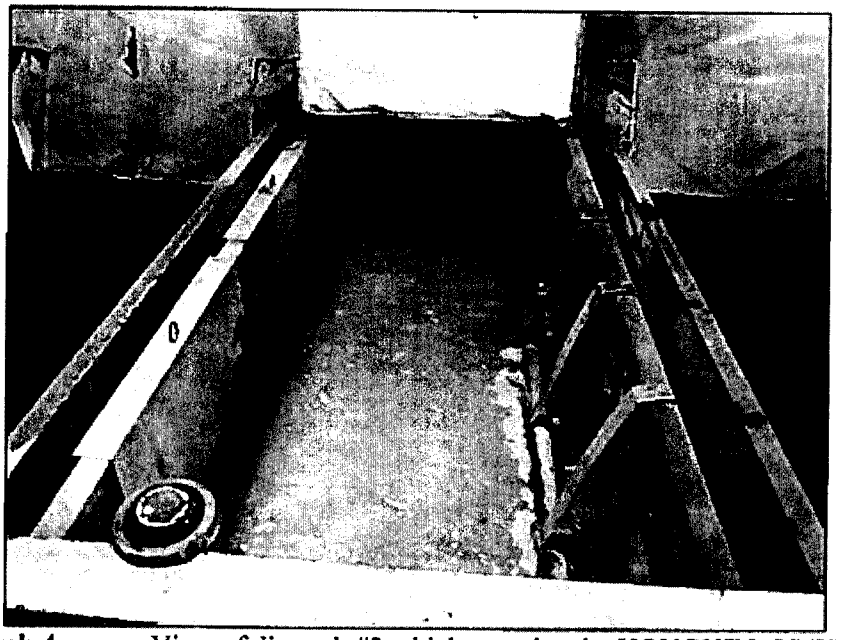
Photograph 1. View of dip tank #1 containing the facility's HOUGHTO-CLEAN 8150 solution.



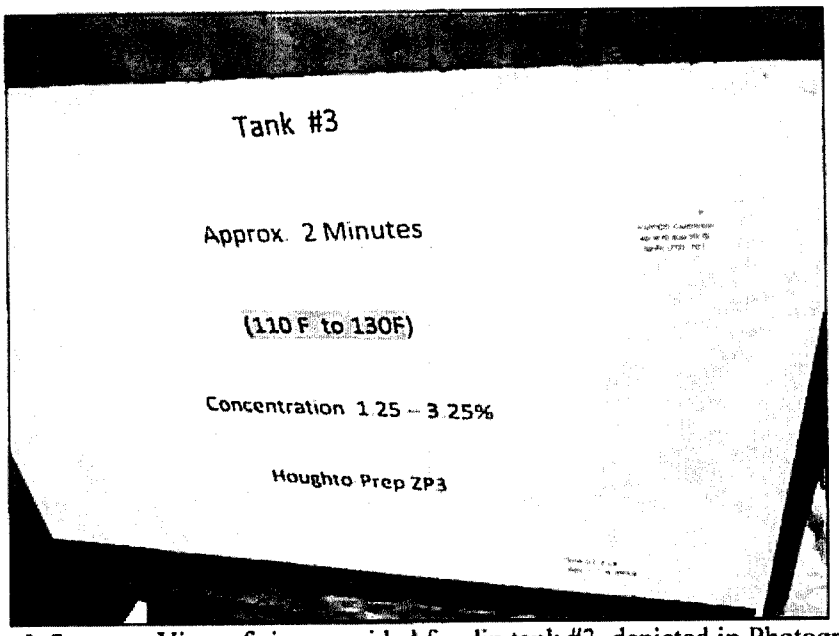
Photograph 2. Up-close view of the information for dip tank #1, depicted in Photograph 1, above.



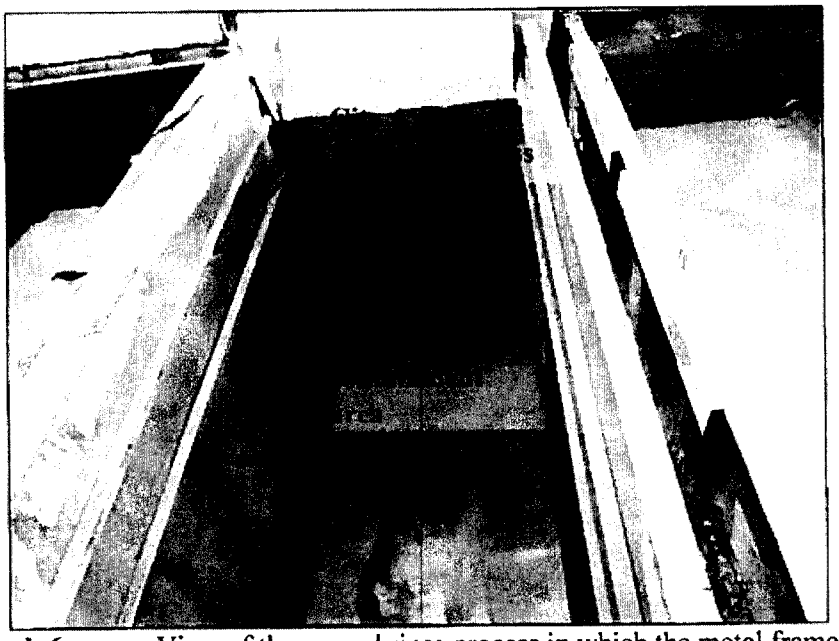
Photograph 3. View of the first rinse process in which the metal frame is suspended in the cell and spray-rinsed with water provided by the City. Wastewater generated from this process drains from the bottom of the tank and is ultimately pumped and discharged to the POTW.



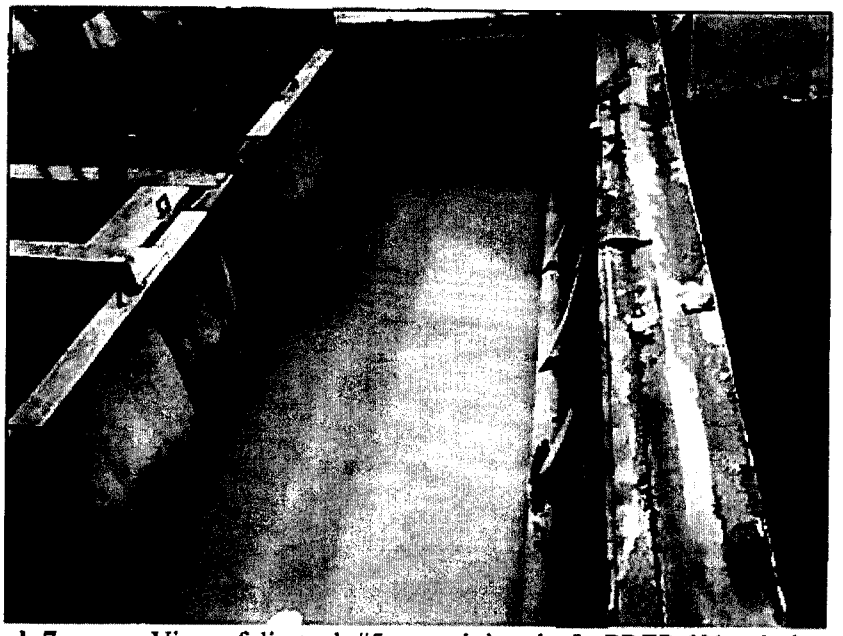
Photograph 4. View of dip tank #3 which contains the HOUGHTO-PREP ZP-3 solution (containing inorganic fluoride, nitric acid, and phosphoric acid).



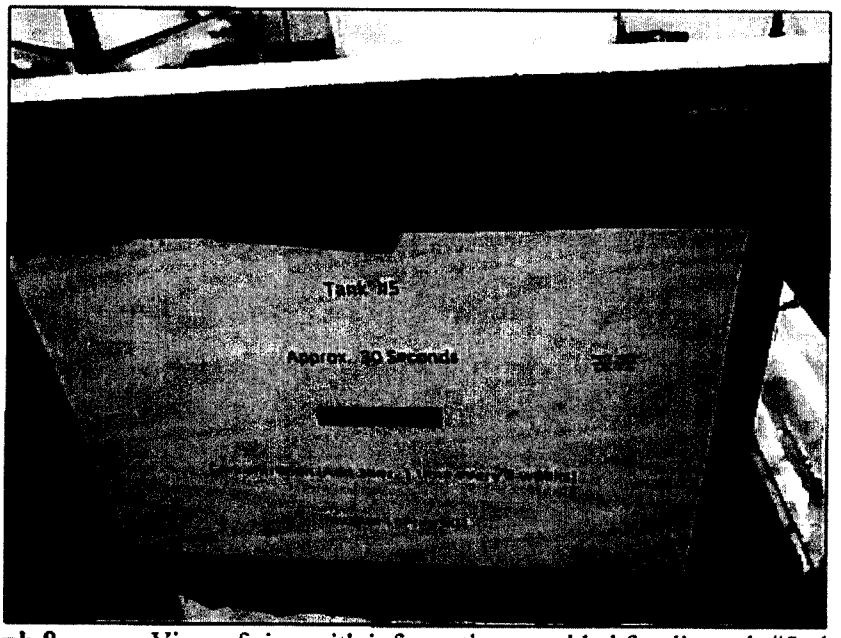
Photograph 5. View of sign provided for dip tank #3, depicted in Photograph 4, above.



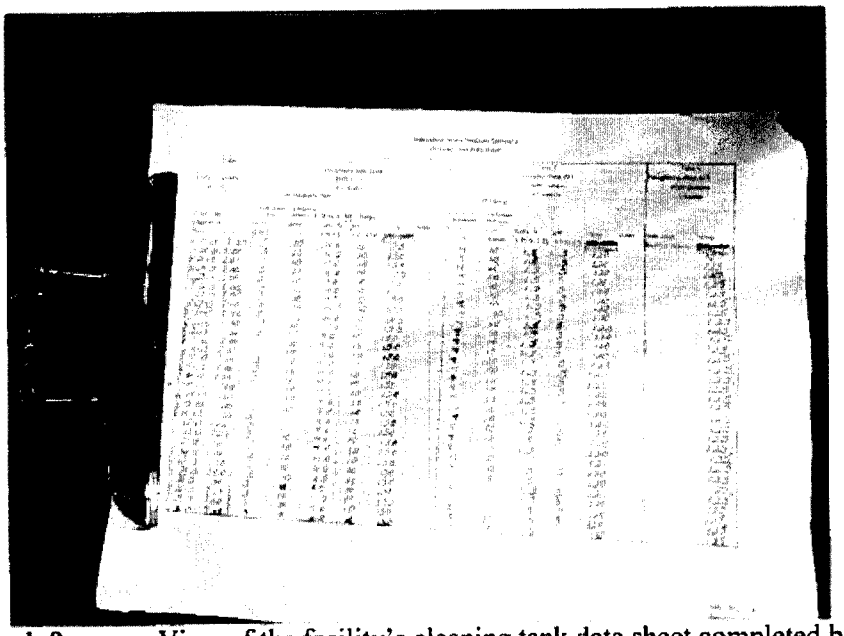
Photograph 6. View of the second rinse process in which the metal frame is again suspended above the ground, within the cell and spray-rinsed with water provided by the City. Wastewater generated from this process drains from the bottom of the tank and is ultimately pumped and discharged to the POTW.



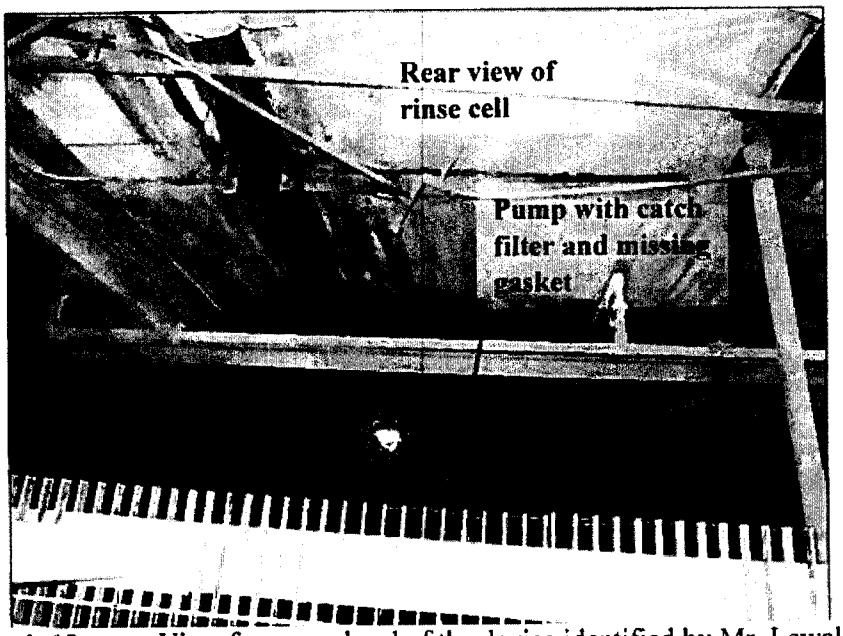
Photograph 7. View of dip tank #5, containing the LuPREP 601 solution (containing triethanolamine). This is the final stage of the metal frame washing process.



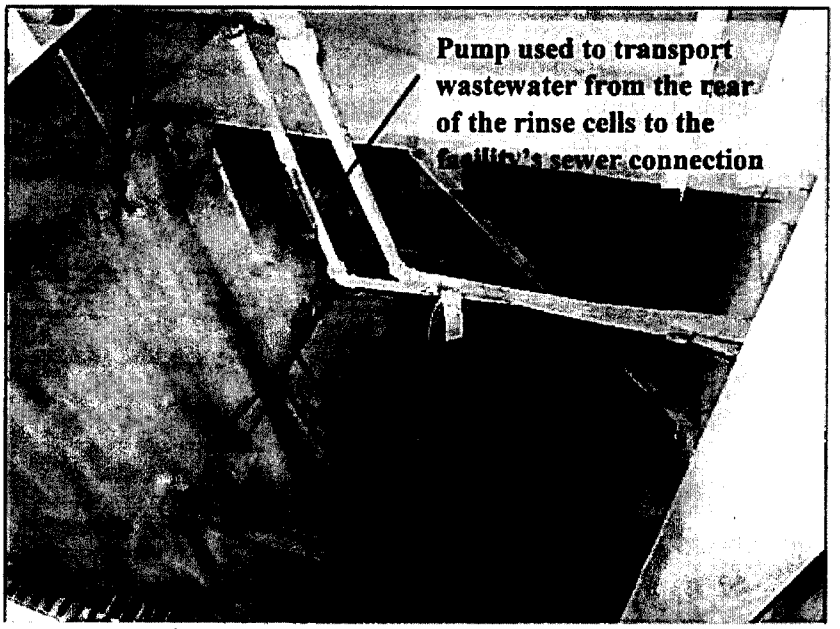
Photograph 8. View of sign with information provided for dip tank #5, depicted in Photograph 7, above.



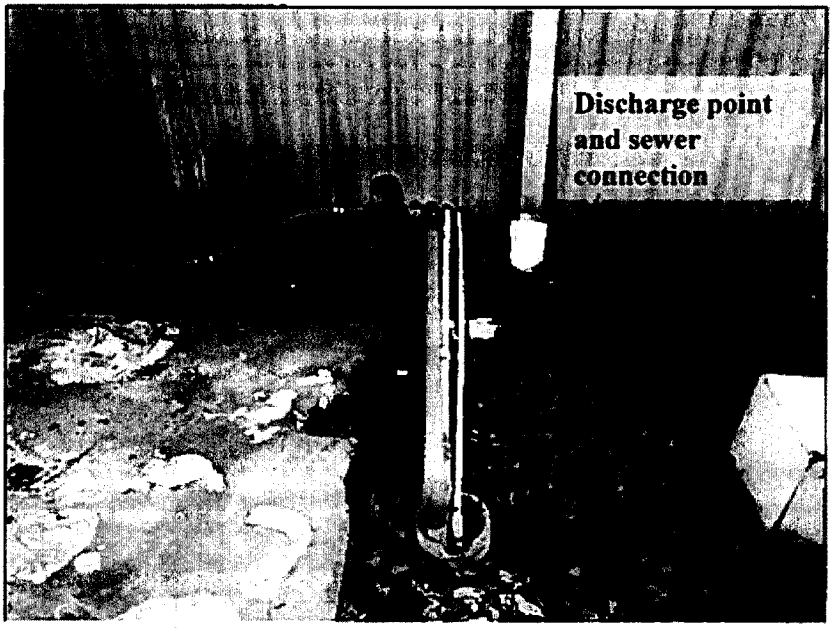
Photograph 9. View of the facility's cleaning tank data sheet completed by a facility employee.



Photograph 10. View from overhead of the device identified by Mr. Lewallen as the pump with a catch filter that was missing a gasket, causing wastewater to leak and collect on the floor of the secondary containment sump.

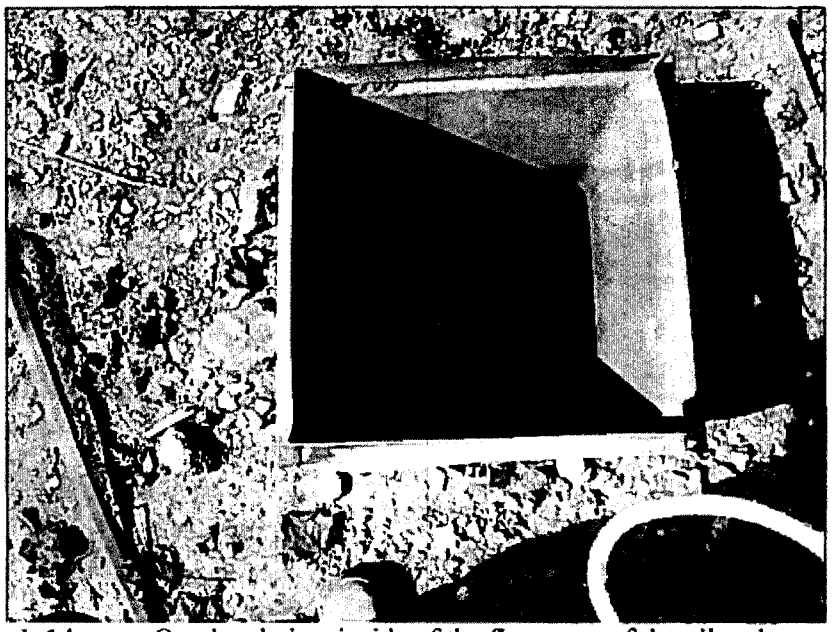


Photograph 11. View of the pump used to transport wastewater from the rinse cells to the facility's sewer connection.

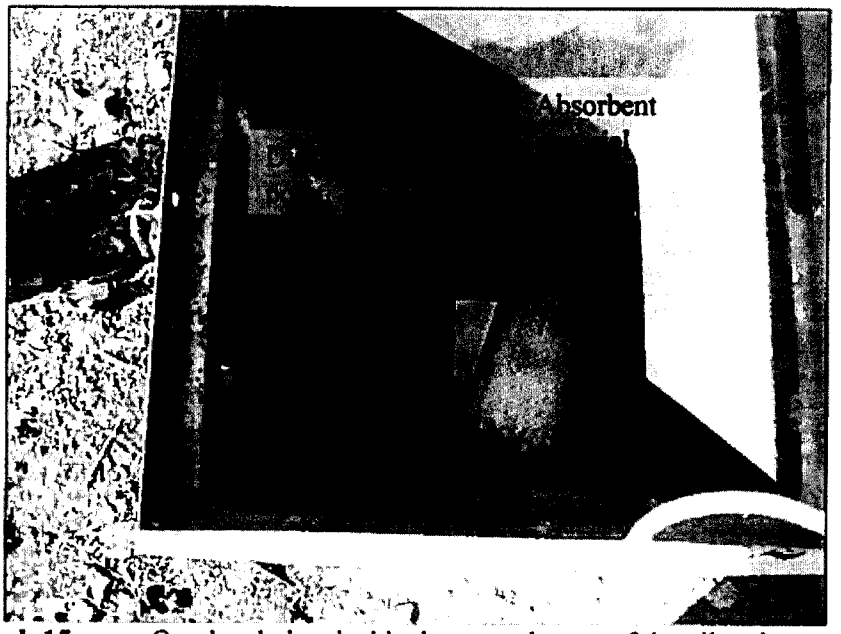


Photograph 12. View of the hard piping from within the facility leading to the facility's sewer connection and ultimately, to the City POTW.

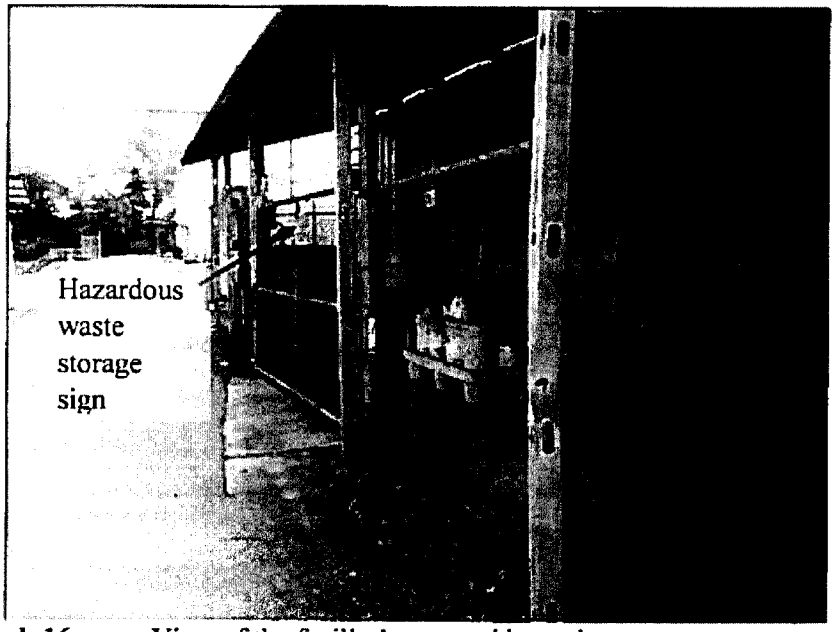
Photograph 13. View facing northwest of the facility's oil and water separator located to the northwest of the building housing the facility's compressor and to the east of the facility's Process Warehouse.



Photograph 14. Overhead view inside of the first stage of the oil and water separator.



Photograph 15. Overhead view inside the second stage of the oil and water separator. Note the absorbent material applied inside the second stage of the separator.



Photograph 16. View of the facility's covered hazardous waste storage area located outdoors of the facility to the northwest of the process warehouse.

Document Log

Habersham metal Products Company

Attachment 2

Habersham Metal Products Company

MSDSs for Dip Tanks

Tank #1 Rd H
10025 9/30/15

Houghton International Inc.

Revision Date : 04/25/2011

Material Safety Data Sheet
HOUGHTO-CLEAN 8150

1. Chemical Product and Company Identification

Product Name	HOUGHTO-CLEAN 8150	Emergency Phone Number - Canada	24 HOUR - 613-996-6666 (CANUTEC)
Company Name	Houghton International Inc. Madison & Van Buren Aves Valley Forge, PA 19482	CHEMTREC Company Code	HOUH
Company Name	Houghton Canada Inc. 116 Walker Drive, Unit B Brampton, ON L6T 5P5 Phone: 905-494-3770	CHEMTREC Customer Number	10769
Website	www.houghtonintl.com	FAX	(610) 666-1376
Telephone	(610) 666-4000	Customer Service	(888) 459-9844
Emergency Phone Number	24 HOUR - (800) 424-9300 (CHEMTREC)		

HABERSHAM METAL PRODUCTS CO.
RECEIVED
JUL 05 2011
CORNELIA, GA

2. Hazardous Ingredients

Component	Cas No	% by Weight	Hazards
Hexylene Glycol	107-41-5	1-5	TLV: 25 ppm - ceiling PEL: N/E
Sodium Carbonate	497-19-8	1-5	TLV: 10 mg/m³ - dust PEL: 15 mg/m³ - dust

N/E - Not Established; N/A - Not Applicable; Mfr - Manufacturer Recommendation

3. Hazards Identification

Primary Entry Routes	EYES, SKIN, INHALATION
Acute Effects	
Inhalation	INHALATION OF MISTS MAY CAUSE IRRITATION OF THE UPPER RESPIRATORY TRACT.
Eye	MAY CAUSE MILD TO MODERATE EYE IRRITATION.
Skin	MAY CAUSE MODERATE SKIN IRRITATION ON PROLONGED CONTACT IF SKIN IS SENSITIVE.
Ingestion	INGESTION MAY CAUSE IRRITATION OF MOUTH, THROAT AND STOMACH. ASPIRATION MAY CAUSE LUNG DAMAGE.

Continued on Next Page

Habersham

3. Hazards Identification - continued

Carcinogenicity	THIS PRODUCT DOES NOT CONTAIN ANY COMPONENT REPORTABLE AS A CARCINOGEN UNDER 29 CFR 1910.1200.
Medical Conditions Aggravated by LongTerm Exposure	PRE-EXISTING SKIN AND RESPIRATORY CONDITIONS MAY BE AGGRAVATED BY EXPOSURE.
Chronic Effects	UNKNOWN
HMIS:	
Health	1
Flammability	0
Physical Hazard	0

* Indicates that there may be chronic health effects present

4. First Aid Measures

Inhalation	IF INHALED, REMOVE TO A SOURCE OF FRESH AIR.
Eye Contact	IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES. GET IMMEDIATE MEDICAL ATTENTION.
Skin Contact	WASH SKIN THOROUGHLY WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE REUSING. CONSULT PHYSICIAN IF IRRITATION PERSISTS.
Ingestion	IF INGESTED, DO NOT INDUCE VOMITING. GIVE WATER OR MILK TO DILUTE. CONTACT PHYSICIAN IMMEDIATELY.
Note to Physicians	NO SPECIFIC ANTIDOTE KNOWN. BASED ON INDIVIDUAL REACTIONS OF THE PATIENT, THE PHYSICIAN'S JUDGMENT SHOULD BE USED TO CONTROL SYMPTOMS AND CLINICAL CONDITIONS.

N/A - Not Applicable

5. Fire Fighting Measures

Flash Point	N/A - PRODUCT CONTAINS WATER.
Autoignition Temperature	N/D
LEL	N/D

Continued on Next Page

5. Fire Fighting Measures - continued

UEL	N/D
Extinguishing Media	PRODUCT CONTAINS WATER. IF WATER IS REMOVED, USE CARBON DIOXIDE, DRY CHEMICAL OR FOAM.
Unusual Fire or Explosion Hazards	PRODUCT IS ALKALINE. WEAR PROTECTIVE GEAR DURING FIREFIGHTING.
Fire Fighting Instructions	WEAR SELF-CONTAINED BREATHING APPARATUS IN CONFINED AREAS.
NFPA:	
Health	1
Flammability	0
Reactivity	0
Special	N/A

N/A - Not Applicable; ND - Not Determined; > - Greater Than; < - Less Than

6. Accidental Release Measures

Spill or Release Procedures	DILUTE WITH WATER, NEUTRALIZE TO PH 7 WITH DILUTE ACID AND MOP UP THOROUGHLY TO AVOID RESIDUAL SLIPPERINESS.

7. Handling and Storage

Handling Precautions	AVOID CONTACT WITH EYES, SKIN AND CLOTHING. KEEP FROM FREEZING. WASH THOROUGHLY AFTER HANDLING.
Storage Requirements	DO NOT STORE NEAR STRONG ACIDS. KEEP CONTAINERS CLOSED WHEN NOT IN USE. DO NOT USE ZINC OR BRASS BUNGS AND FITTINGS. EMPTY CONTAINERS MAY CONTAIN HAZARDOUS VAPORS AND RESIDUE AND THEREFORE RETAIN ALL HAZARDS.

8. Exposure Controls/Personal Protection

Engineering Controls	PROVIDE GENERAL AND/OR LOCAL EXHAUST VENTILATION TO MINIMIZE AIRBORNE CONCENTRATIONS AND REDUCE EXPOSURE.
Personal Protective Equipment	

Continued on Next Page

8. Exposure Controls/Personal Protection - continued

Eye/Face Protection	WEAR SAFETY GOGGLES OR SAFETY GLASSES WITH SIDE SHIELDS.
Skin Protection	USE RUBBER GLOVES AND PROTECTIVE CLOTHING TO MINIMIZE SKIN CONTACT.
Respiratory Protection	RESPIRATORY PROTECTION NORMALLY NOT REQUIRED. RECOMMENDED IN MISTING CONDITIONS.
Other	EYEWASH AND SAFETY SHOWER RECOMMENDED.

Comments: Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, or applying cosmetics.

9. Physical and Chemical Properties

Appearance	CLEAR PALE STRAW LIQUID	Water Solubility	COMPLETE
Odor	SLIGHT ALKALINE ODOR	Boiling Point	215°F / 102°C
Vapor Pressure (mmHg)	AS WATER	Freezing/ Melting Point	N/D
Vapor Density (Air = 1)	AS WATER	Evaporation Rate (BuAc = 1)	AS WATER
Specific Gravity (Water = 1)	1.10		
pH (Neat)	11.2		
pH (Dilution)			
At Percent	2		
pH	10.7		

N/D - Not Determined; N/A - Not Applicable; > - Greater Than; < - Less Than

10. Stability and Reactivity

Stability	THIS PRODUCT IS STABLE AT ROOM TEMPERATURE IN CLOSED CONTAINERS UNDER NORMAL STORAGE AND HANDLING CONDITIONS.
Conditions to Avoid	KEEP FROM FREEZING.
Chemical Incompatibilities	AVOID CONTACT WITH STRONG OXIDIZERS.

Continued on Next Page

10. Stability and Reactivity - continued

Hazardous Decomposition Products	THERMAL: OXIDES OF CARBON
Hazardous Polymerization	HAZARDOUS POLYMERIZATION WILL NOT OCCUR.

11. Toxicological Information

NO DATA AVAILABLE

12. Ecological Information

NO DATA AVAILABLE

13. Disposal Considerations

Disposal	FOLLOW PERTINENT REGULATIONS FOR DISPOSAL. IT IS THE RESPONSIBILITY OF THE PRODUCT USER TO DETERMINE, AT THE TIME OF DISPOSAL, WHETHER A MATERIAL CONTAINING THE PRODUCT OR DERIVED FROM THE PRODUCT SHOULD BE CLASSIFIED AS A HAZARDOUS WASTE. (40 CFR 261.20-24)
RCRA Hazardous Waste Number	D002 (CORROSIVITY)

14. Transportation Information

Proper Shipping Name	NOT HAZARDOUS UNDER DOT, AIR OR IMO REGULATIONS.
TDG	NOT REGULATED UNDER THE CANADIAN TRANSPORTATION OF DANGEROUS GOODS REGULATION.

15. Regulatory Information

TSCA Section 8(b)	ALL OF THE COMPONENTS IN THIS PRODUCT ARE ON THE TSCA INVENTORY.
DSL	ALL OF THE COMPONENTS IN THIS PRODUCT ARE ON THE CANADIAN DSL. THIS PRODUCT HAS BEEN CLASSIFIED IN ACCORDANCE WITH THE HAZARD CRITERIA OF THE CPR AND THE MSDS CONTAINS ALL OF THE INFORMATION REQUIRED BY THE CPR.

Continued on Next Page

15. Regulatory Information - continued

CERCLA Reportable Quantity	NONE
SARA Title III, Section 313	THIS PRODUCT CONTAINS NO TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372.
SCAQMD	THIS PRODUCT CAN BE USED WITH NO RESTRICTIONS IN CALIFORNIA'S SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT'S UNDER RULE 1144.
Ozone Depleting Substances	THIS PRODUCT WAS NOT MANUFACTURED, DOES NOT CONTAIN, AND WAS NOT PACKAGED USING ANY CLASS I OR CLASS II OZONE DEPLETING SUBSTANCE AS DEFINED BY THE CLEAN AIR ACT.
WHMIS	D2B

16. Other Information

Prepared By	GARY CARL
Title	MANAGER, PRODUCT SAFETY

Disclaimer: The information presented herein has been compiled from sources considered to be dependable and is accurate as of the date issued. However, since data, safety standards, and government regulations are subject to change and the conditions of handling and use are beyond our control, Houghton International makes no warranty regarding the accuracy of such data or its suitability for any purchaser's use or for any consequence of its use. The data in this MSDS relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process. Safe handling and use remains the responsibility of the purchaser and the purchaser has the sole responsibility to determine the suitability of the materials for any use and the manner of use contemplated. Houghton International assumes no responsibility for injury to the recipient or to third persons or for any damage to any property and the recipient assumes all such risks.

10026 Tank #3 JKH 9/30/11

Houghton International Inc. Revision Date : 08/21/2009

Material Safety Data Sheet
HOUGHTO-PREP ZP-3

1. Chemical Product and Company Identification

Product Name	HOUGHTO-PREP ZP-3	Emergency Phone Number	24 HOUR - (800) 424-9300 (CHEMTREC)
Company Name	Houghton Metal Finishing 1055 Windward Ridge Suite 140 Alpharetta, GA 30005	FAX	770-753-4902
		Customer Service	800-638-8819
Website	www.houghtonintl.com		
Telephone	770-753-4892		

2. Hazardous Ingredients

Component	Cas No	% by Weight	Hazards
Inorganic Fluoride	proprietary	< 1	TLV: 2.5 mg/m³ as F PEL: 2.5 mg/m³ as F
Nitric Acid	7697-37-2	< 1	TLV: 2 ppm PEL: 2 ppm STEL: 4 ppm Other:
Phosphoric Acid	7664-38-2	<1	TLV: 1 mg/m³ PEL: 1 mg/m³ STEL: 3 mg/m³ Other:

HAMERSHAM METAL PRODUCTS CO. RECEIVED MAY 20 2010 CORNELIA, GA

N/E - Not Established; N/A - Not Applicable; Mfr - Manufacturer Recommendation

3. Hazards Identification

Primary Entry Routes	EYES, SKIN, INHALATION
Acute Effects	
Inhalation	AVOID BREATHING MISTS OF PRODUCT AND/OR DILUTIONS, WHICH MAY CAUSE IRRITATION OF UPPER RESPIRATORY TRACT.
Eye	MAY CAUSE SEVERE EYE IRRITATION OR CHEMICAL BURNS. MAY CAUSE PERMENANT DAMAGE.
Skin	MAY CAUSE SEVERE SKIN IRRITATION OR CHEMICAL BURNS. BLISTERING MAY OCCUR.
Ingestion	INGESTION MAY CAUSE SEVERE IRRITATION OR CORROSIVE BURNS TO MOUTH, THROAT AND DIGESTIVE TRACT.

Continued on Next Page

Hamersham

3. Hazards Identification - continued

Carcinogenicity	THIS PRODUCT DOES NOT CONTAIN ANY COMPONENT REPORTABLE AS A CARCINOGEN UNDER 29 CFR 1910.1200.
Medical Conditions Aggravated by LongTerm Exposure	PRE-EXISTING SKIN AND RESPIRATORY CONDITIONS MAY BE AGGRAVATED BY EXPOSURE
Chronic Effects	UNKNOWN
HMIS:	
Health	3
Flammability	0
Physical Hazard	0

* Indicates that there may be chronic health effects present

4. First Aid Measures

Inhalation	IF INHALED, REMOVE TO A SOURCE OF FRESH AIR.
Eye Contact	IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES. GET IMMEDIATE MEDICAL ATTENTION.
Skin Contact	FLUSH SKIN WITH LARGE AMOUNTS OF WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE REUSING. CONSULT PHYSICIAN IF IRRITATION PERSISTS.
Ingestion	IF INGESTED, DO NOT INDUCE VOMITING. RINSE MOUTH AND THROAT WITH WATER. GIVE WATER, MILK OR MILK OF MAGNESIA. CONSULT PHYSICIAN.
Note to Physicians	NO SPECIFIC ANTIDOTE KNOWN. BASED ON INDIVIDUAL REACTIONS OF THE PATIENT, THE PHYSICIAN'S JUDGMENT SHOULD BE USED TO CONTROL SYMPTOMS AND CLINICAL CONDITIONS.

N/A - Not Applicable

5. Fire Fighting Measures

Flash Point	N/A - PRODUCT CONTAINS WATER.
Autoignition Temperature	N/D
LEL	N/A

Continued on Next Page

5. Fire Fighting Measures - continued

UEL	N/A
Extinguishing Media	USE MEDIA APPROPRIATE FOR SURROUNDING FIRES.
Unusual Fire or Explosion Hazards	CAUTION! PRODUCT IS HIGHLY ACIDIC. WEAR PROTECTIVE GEAR IF SPILLED DURING A FIRE.
Fire Fighting Instructions	USE WATER TO KEEP FIRE-EXPOSED CONTAINERS COOL. WEAR PROTECTIVE GEAR DURING FIREFIGHTING.
NFPA:	
Health	3
Flammability	0
Reactivity	0
Special	COR

N/A - Not Applicable; ND - Not Determined; > - Greater Than; < - Less Than

6. Accidental Release Measures

Spill or Release Procedures	WEAR APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT. NEUTRALIZE SPILL WITH SODA ASH OR DILUTE ALKALI, DILUTE WITH WATER AND MOP UP THOROUGHLY.

7. Handling and Storage

Handling Precautions	CAUTION! PRODUCT IS ACIDIC. WEAR RECOMMENDED PROTECTIVE EQUIPMENT. AVOID CONTACT WITH EYES, SKIN AND CLOTHING. USE WITH ADEQUATE VENTILATION. WASH THOROUGHLY AFTER HANDLING.
Storage Requirements	STORE AWAY FROM STRONG ALKALI. KEEP CONTAINERS CLOSED WHEN NOT IN USE. EMPTY CONTAINERS MAY CONTAIN HAZARDOUS VAPORS AND RESIDUE AND THEREFORE RETAIN ALL HAZARDS.

8. Exposure Controls/Personal Protection

Engineering Controls	PROVIDE GENERAL AND/OR LOCAL EXHAUST VENTILATION TO MAINTAIN AIRBORNE CONCENTRATIONS BELOW THE EXPOSURE LIMITS IN SECTION 2.
Personal Protective Equipment	

Continued on Next Page

8. Exposure Controls/Personal Protection - continued

Eye/Face Protection	WEAR SAFETY GOGGLES OR FULL FACE SHIELD.
Skin Protection	USE RUBBER GLOVES AND LONG SLEEVES TO MINIMIZE SKIN EXPOSURE. USE APRON OR OVERALLS IF SPLASHING IS POSSIBLE.
Respiratory Protection	RESPIRATORY PROTECTION REQUIRED IF APPLICABLE EXPOSURE LIMITS ARE EXCEEDED. RECOMMENDED IN MISTING CONDITIONS.
Other	EYEWASH AND SAFETY SHOWER RECOMMENDED.

Comments: Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, or applying cosmetics.

9. Physical and Chemical Properties

Appearance	CLEAR, AMBER LIQUID	Water Solubility	COMPLETE
Odor	SLIGHT ACIDIC ODOR	Boiling Point	215°F / 102°C
Vapor Pressure (mmHg)	N/D	Evaporation Rate (BuAc = 1)	< 1
Vapor Density (Air = 1)	N/D		
Specific Gravity (Water = 1)	1.01		
pH (Neat)	1.8		
pH (Dilution)			
At Percent	2		
pH	2.4		

N/D - Not Determined; N/A - Not Applicable; > - Greater Than; < - Less Than

10. Stability and Reactivity

Stability	THIS PRODUCT IS STABLE AT ROOM TEMPERATURE IN CLOSED CONTAINERS UNDER NORMAL STORAGE AND HANDLING CONDITIONS.
Chemical Incompatibilities	STRONG OXIDIZERS AND ALKALIES
Hazardous Decomposition Products	OXIDES OF NITROGEN AND PHOSPHORUS.

Continued on Next Page

10. Stability and Reactivity - continued

Hazardous Polymerization	HAZARDOUS POLYMERIZATION WILL NOT OCCUR.

11. Toxicological Information

NO DATA AVAILABLE

12. Ecological Information

NO DATA AVAILABLE

13. Disposal Considerations

Disposal	FOLLOW PERTINENT REGULATIONS FOR DISPOSAL. IT IS THE RESPONSIBILITY OF THE PRODUCT USER TO DETERMINE, AT THE TIME OF DISPOSAL, WHETHER A MATERIAL CONTAINING THE PRODUCT OR DERIVED FROM THE PRODUCT SHOULD BE CLASSIFIED AS A HAZARDOUS WASTE. (40 CFR 261.20-24)
RCRA Hazardous Waste Number	D002 (CORROSIVITY)

14. Transportation Information

Proper Shipping Name	REFER TO BILL OF LADING OR CONTACT HOUGHTON METAL FINISHING CO.

15. Regulatory Information

TSCA Section 8(b)	ALL OF THE COMPONENTS IN THIS PRODUCT ARE ON THE TSCA INVENTORY.
DSL	ALL OF THE COMPONENTS IN THIS PRODUCT ARE IN COMPLIANCE WITH THE CANADIAN DSL.
CERCLA Reportable Quantity	NONE
SARA Title III, Section 313	THIS PRODUCT CONTAINS NO TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372.

Continued on Next Page

15. Regulatory Information - continued

Ozone Depleting Substances	THIS PRODUCT WAS NOT MANUFACTURED, DOES NOT CONTAIN, AND WAS NOT PACKAGED USING ANY CLASS I OR CLASS II OZONE DEPLETING SUBSTANCE AS DEFINED BY THE CLEAN AIR ACT.
WHMIS	E

16. Other Information

Prepared By	GARY CARL
Title	MANAGER, PRODUCT SAFETY

Disclaimer: The information presented herein has been compiled from sources considered to be dependable and is accurate as of the date issued. However, since data, safety standards, and government regulations are subject to change and the conditions of handling and use are beyond our control, Houghton International makes no warranty regarding the accuracy of such data or its suitability for any purchaser's use or for any consequence of its use. The data in this MSDS relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process. Safe handling and use remains the responsibility of the purchaser and the purchaser has the sole responsibility to determine the suitability of the materials for any use and the manner of use contemplated. Houghton International assumes no responsibility for injury to the recipient or to third persons or for any damage to any property and the recipient assumes all such risks.

10027 Tank #5 KCH 9/30/11

Houghton International Inc.

Revision Date : 09/01/2004

Material Safety Data Sheet
LuPREP 601

1. Chemical Product and Company Identification

Product Name	LuPREP 601	Emergency Phone Number	24 HOUR - (800) 424-9300 (CHEMTREC)
Company Name	Houghton International Inc. Madison & Van Buren Aves Valley Forge, PA 19482	FAX	(610) 666-1376
Website	www.houghtoninti.com	Customer Service	(888) 459-9844
Telephone	(610) 666-4000		

2. Hazardous Ingredients

Component	Cas No	% by Weight	Hazards
Triethanolamine	102-71-6	1-10	TLV: 5 mg/m³ PEL: N/E STEL: N/E Other: N/E

N/E - Not Established; N/A - Not Applicable; M/r - Manufacturer Recommendation

3. Hazards Identification

Primary Entry Routes	EYES, SKIN, INHALATION
Acute Effects	
Inhalation	MISTS MAY IRRITATE UPPER RESPIRATORY TRACT.
Eye	MAY CAUSE IRRITATION.
Skin	MAY CAUSE IRRITATION ON PROLONGED CONTACT.
Ingestion	NO SIGNIFICANT EFFECTS KNOWN
Carcinogenicity	NO COMPONENT KNOWN TO BE PRESENT IN THIS PRODUCT AT GREATER THAN 0.1% IS LISTED AS A CARCINOGEN BY IARC, NTP OR OSHA.
Medical Conditions Aggravated by LongTerm Exposure	PRE-EXISTING SKIN AND RESPIRATORY CONDITIONS MAY BE AGGRAVATED BY EXPOSURE.
Chronic Effects	UNKNOWN
HMIS:	

HABERSHAM METAL PRODUCTS CO.
RECEIVED
MAR 0 2 2012
CORNELIA, GA

Continued on Next Page

Habersham

3. Hazards Identification - continued

Health	1
Flammability	0
Reactivity	0

* Indicates that there may be chronic health effects present

4. First Aid Measures

Inhalation	REMOVE TO SOURCE OF FRESH AIR.
Eye Contact	FLUSH WITH WATER 15 MINUTES; CONSULT PHYSICIAN.
Skin Contact	WASH WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING AND LAUNDER BEFORE REUSING.
Ingestion	GIVE WATER OR MILK. INDUCE VOMITING. CONSULT PHYSICIAN.
Note to Physicians	NO SPECIFIC ANTIDOTE KNOWN. BASED ON INDIVIDUAL REACTIONS OF THE PATIENT, THE PHYSICIAN'S JUDGMENT SHOULD BE USED TO CONTROL SYMPTOMS AND CLINICAL CONDITIONS.

N/A - Not Applicable

5. Fire Fighting Measures

Flash Point	N/A - PRODUCT CONTAINS WATER
Autoignition Temperature	N/D
LEL	N/D
UEL	N/D
Extinguishing Media	N/A USE APPROPRIATE MEDIA FOR SURROUNDING FIRES.
Unusual Fire or Explosion Hazards	NONE.
Fire Fighting Instructions	IF WATER IS REMOVED, USE CARBON DIOXIDE, FOAM, OR DRY CHEMICAL.
NFPA:	
Health	1
Flammability	0

Continued on Next Page

5. Fire Fighting Measures - continued

Reactivity	0
Special	N/A

N/A - Not Applicable; ND - Not Determined; > - Greater Than; < - Less Than

6. Accidental Release Measures

Spill or Release Procedures	WEAR GOGGLES AND GLOVES. DILUTE WITH WATER AND NEUTRALIZE WITH DILUTE ACID. MOP UP THOROUGHLY TO AVOID RESIDUAL SLIPPERINESS.

7. Handling and Storage

Storage and Handling Requirements	KEEP AWAY FROM STRONG OXIDIZERS. AVOID CONTACT WITH EYES, SKIN AND CLOTHING. WASH THOROUGHLY AFTER HANDLING. USE WITH ADEQUATE VENTILATION. KEEP CONTAINERS CLOSED WHEN NOT IN USE.

8. Exposure Controls/Personal Protection

Engineering Controls	GENERAL VENTILATION IS ADEQUATE.
Personal Protective Equipment	
Eye/Face Protection	SAFETY GOGGLES OR SAFETY GLASSES WITH SIDE SHIELDS.
Skin Protection	RUBBER GLOVES IF SKIN IS SENSITIVE.
Respiratory Protection	REQUIRED IF EXPOSURE LIMITS IN SECTION 2 ARE EXCEEDED.
Other	EYE BATH AND SAFETY SHOWER RECOMMENDED.

Comments: Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, or applying cosmetics.

9. Physical and Chemical Properties

Appearance	CLEAR, WATER-WHITE LIQUID; NO ODOR	Water Solubility	COMPLETE
		Boiling Point	215° F

Continued on Next Page

9. Physical and Chemical Properties - continued

Vapor Pressure (mmHg)	AS WATER	Freezing/ Melting Point	N/D
Vapor Density (Air = 1)	AS WATER	Evaporation Rate (BuAc = 1)	AS WATER
Specific Gravity (Water = 1)	1.054		
pH (Neat)	10.3		
pH (Dilution)			
At Percent	2		
pH	9.5		

N/D - Not Determined; N/A - Not Applicable; > - Greater Than; < - Less Than

10. Stability and Reactivity

Stability	THIS PRODUCT IS STABLE AT ROOM TEMPERATURE IN CLOSED CONTAINERS UNDER NORMAL STORAGE AND HANDLING CONDITIONS.
Chemical Incompatibilities	STRONG OXIDIZERS
Hazardous Decomposition Products	THERMAL; OXIDES OR CARBON AND NITROGEN
Hazardous Polymerization	HAZARDOUS POLYMERIZATION WILL NOT OCCUR.

11. Toxicological Information

NO DATA AVAILABLE

12. Ecological Information

NO DATA AVAILABLE

Continued on Next Page

13. Disposal Considerations

Disposal	FOLLOW PERTINENT REGULATIONS FOR DISPOSAL. IT IS THE RESPONSIBILITY OF THE PRODUCT USER TO DETERMINE, AT THE TIME OF DISPOSAL, WHETHER A MATERIAL CONTAINING THE PRODUCT OR DERIVED FROM THE PRODUCT SHOULD BE CLASSIFIED AS A HAZARDOUS WASTE. (40 CFR 261.20-24)
RCRA Hazardous Waste Number	N/A

14. Transportation Information

Proper Shipping Name	NOT HAZARDOUS UNDER DOT, AIR, OR IMO REGULATIONS.

15. Regulatory Information

TSCA Section 8(b)	ALL OF THE COMPONENTS IN THIS PRODUCT ARE ON THE TSCA INVENTORY.
CERCLA Reportable Quantity	NONE
SARA Title III, Section 313	THIS PRODUCT CONTAINS NO TOXIC CHEMICAL SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 AND 40 CFR PART 372.
Ozone Depleting Substances	THIS PRODUCT WAS NOT MANUFACTURED, DOES NOT CONTAIN, AND WAS NOT PACKAGED USING ANY CLASS I OR CLASS II OZONE DEPLETING SUBSTANCE AS DEFINED BY THE CLEAN AIR ACT.

16. Other Information

Prepared By	GARY CARL
Title	MANAGER, PRODUCT SAFETY

Disclaimer: The information presented herein has been compiled from sources considered to be dependable and is accurate as of the date issued. However, since data, safety standards, and government regulations are subject to change and the conditions of handling and use are beyond our control, Houghton International makes no warranty regarding the accuracy of such data or its suitability for any purchaser's use or for any consequence of its use. The data in this MSDS relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process. Safe handling and use remains the responsibility of the purchaser and the purchaser has the sole responsibility to determine the suitability of the materials for any use and the manner of use contemplated. Houghton International assumes no responsibility for injury to the recipient or to third persons or for any damage to any property and the recipient assumes all such risks.

Attachment 3

Habersham Metal Products Company

Analytical Results for Dip Tanks

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

April 25, 2014

Richard Brimley
Hepaco, Inc.
3645 Oakcliff Rd
Doraville GA 30340

TEL: (770) 934-1180
FAX: (770) 621-0238

RE: Habersham Tank #1

Dear Richard Brimley:

Order No: 1404I63

Analytical Environmental Services, Inc. received 1 samples on 4/17/2014 1:35:00 PM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/13-06/30/14.
-AIHA-LAP, LLC Laboratory ID: 100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/15.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

James Forrest
Project Manager

5080 Peachtree Ind. Blvd. • Atlanta, Georgia 30340 • Tel: 770.457.8177 • Fax: 770.457.8188 • Toll Free: 800.972.4889
www.aesatlanta.com

#6

1404I63.

HEPACO

Serious experience for serious times.

Date: 4.17.14 Sample Time: 10:00 PO#: 61-00001 Project#: 999.000 Sample ID: Habersham Tank #1

Matrix: Water Number of Business Days Turn Around: ~~(1)~~ (2) (Same Day) authorization required

	Sb	As	Ba	Be	Cd	Cr	Cu	Pb	Hg	Ni	PO4	Se	Ag
Test	X	X	X	X	X	X	X	X	X	X	X	X	X
Method	200.8	200.8	200.8	200.8	200.8	200.8	200.8	200.8	200.8	200.8	365.1	200.8	200.8
Preservative	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	HNO3	Ice	HNO3	HNO3

	Tl	V	Zn	Semi-Volatiles	NH3	pH	BOD	C6H5OH	Cn	TSS/TDS	Oil and Grease	S(2-)	Volatiles
Test	X	X	X	X	X	X	X	X	X	X	X	X	X
Method	200.8	200.8	200.8	625	350.1	150.1	405.1	420.1	335.4	2540B	1664A	376.1	624
Preservative	HNO3	HNO3	HNO3	Ice	H2SO4	Ice	Ice	H2SO4	NaOH	Ice	H2SO4	NaOH+Zn Acetate	HCL

Relinquished by: Lisa Wright Date/Time 4-17-14 Received by: [illegible] Date/Time 4/17/14 1:55

Relinquished by: _____ Date/Time _____ Received by: _____ Date/Time _____

Relinquished by: _____ Date/Time _____ Received by: _____ Date/Time _____

HEPACO
9645 Oakcliff Road
Doraville, GA 30340
Tel: 770-934-1180
Email: lbrinley@hepaco.com
lwright@hepaco.com

Analytical Environmental Services, Inc

Date: 25-Apr-14

Client: Repsco, Inc.
Project: Habersham Tank #1
Lab ID: 1404163

Case Narrative

Sample Receiving Nonconformance

Samples 1404163-001B and 1404163-001E as received did not meet the method specified pH range for the requested test methods for metals/mercury and ammonia, respectively. No attempt to further adjust the pH was made due to sample matrix.

The project name was reported as the sample ID "Habersham Tank #1"

Volatile Organic Compounds Analysis by Method 8260B:

Due to sample matrix, sample 1404163-001A required dilution during preparation and/or analysis resulting in elevated reporting limits.

Semi-Volatiles Analysis by Method 625:

LCS-189587 recovery for 4,6-Dinitro-2-methylphenol was outside control limits biased high. Target analyte was not detected in the analytical samples, and data is reportable with high bias.

Due to sample matrix, sample 1404163-001D required dilution during preparation and/or analysis resulting in elevated reporting limits.

Metals Analysis by Method 200.8:

Due to sample matrix, sample 1404163-001B required dilution during analysis resulting in elevated reporting limits.

Sulfide Analysis by Method SM4500S2 F:

Due to sample matrix, samples in Batch R266159 were dewatered during analysis; therefore, no matrix spike and matrix spike duplicate were performed. LCSD performed as additional QC.

Ammonia-Nitrogen Analysis by Method 350.1:

Due to sample matrix, sample 1404163-001 required dilution during preparation and/or analysis resulting in an elevated reporting limit.

Date: 25-Apr-14

Analytical Environmental Services, Inc

Client:	Hepaco, Inc.	Client Sample ID:	HABERSHAM TANK #1
Project Name:	Habersham Tank #1	Collection Date:	4/17/2014 10:00:00 AM
Lab ID:	1404163-001	Matrix:	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				(E200.2)				
Antimony	43.7	10.0		ug/L	189982	2	04/22/2014 16:36	MR
Arsenic	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Barium	107	20.0		ug/L	189982	2	04/22/2014 16:36	MR
Beryllium	BRL	20.0		ug/L	189982	20	04/22/2014 17:23	MR
Cadmium	1.31	0.700		ug/L	189982	2	04/22/2014 16:36	MR
Chromium	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Copper	605	10.0		ug/L	189982	2	04/22/2014 16:36	MR
Lead	43.3	2.00		ug/L	189982	2	04/22/2014 16:36	MR
Nickel	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Selenium	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Silver	BRL	1.00		ug/L	189982	2	04/22/2014 16:36	MR
Thallium	2.77	2.00		ug/L	189982	2	04/22/2014 16:36	MR
Vanadium	BRL	1000		ug/L	189982	200	04/22/2014 17:54	MR
Zinc	3840	2000		ug/L	189982	200	04/22/2014 17:54	MR
Total Oil and Grease (HEM) E1664A				(E1664)				
Oil and Grease	110	5.0		mg/L	190135	1	04/24/2014 15:30	JW
Total Mercury E245.1				(E245.1)				
Mercury	BRL	0.00020		mg/L	190006	1	04/23/2014 12:33	CG
Total Cyanide (SM4500 CN-C, E)				(SM4500-CN-E)				
Cyanide, Total	BRL	0.010		mg/L	190139	1	04/23/2014 17:45	EH
Sulfide by SM4500-S2-F								
Sulfide	1.20	1.00		mg/L	R266159	1	04/22/2014 17:45	EH
Residue, Suspended (TSS) by SM2540D								
Residue, Suspended (TSS)	30.5	5.0		mg/L	189881	1	04/23/2014 16:55	OM
Residue, Dissolved (TDS) by SM2540C								
Residue, Dissolved (TDS)	10300	10		mg/L	189997	1	04/18/2014 10:00	LB
PRIORITY POLLUTANT-VOLATILES E624				(E624)				
1,1,1-Trichloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,1,2,2-Tetrachloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,1,2-Trichloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,1-Dichloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,1-Dichloroethene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,2-Dichlorobenzene	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
1,2-Dichloroethane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR

Qualifiers:
- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc Date: 25-Apr-14

Client:	Hepaco, Inc.	Client Sample ID:	HABERSHAM TANK #1
Project Name:	Habersham Tank #1	Collection Date:	4/17/2014 10:00:00 AM
Lab ID:	1404163-001	Matrix:	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
PRIORITY POLLUTANT-VOLATILES E624				(E624)				
1,2-Dichloropropane	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
1,3-Dichlorobenzene	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
1,4-Dichlorobenzene	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
2-Chloroethyl vinyl ether	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Acrolein	BRL	500		ug/L	189924	10	04/19/2014 01:12	AR
Acrylonitrile	BRL	500		ug/L	189924	10	04/19/2014 01:12	AR
Benzene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Bromodichloromethane	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Bromoform	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Bromomethane	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Carbon tetrachloride	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Chlorobenzene	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Chloroethane	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
Chloroform	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Chloromethane	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
cis-1,3-Dichloropropene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Dibromochloromethane	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Ethylbenzene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Methylene chloride	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Tetrachloroethene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Toluene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
trans-1,2-Dichloroethene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
trans-1,3-Dichloropropene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Trichloroethene	BRL	20		ug/L	189924	10	04/19/2014 01:12	AR
Trichlorofluoromethane	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
Vinyl chloride	BRL	100		ug/L	189924	10	04/19/2014 01:12	AR
Xylenes, Total	BRL	50		ug/L	189924	10	04/19/2014 01:12	AR
Surr: 4-Bromofluorobenzene	104	66.2-120		%REC	189924	10	04/19/2014 01:12	AR
Surr: Dibromofluoromethane	105	79.5-121		%REC	189924	10	04/19/2014 01:12	AR
Surr: Toluene-d8	99.1	77-117		%REC	189924	10	04/19/2014 01:12	AR
PRIORITY POLLUTANT-SEMIVOLATILE ORGANICS E625				(E625)				
1,2,4-Trichlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
1,2-Dichlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
1,2-Diphenylhydrazine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
1,3-Dichlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
1,4-Dichlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,4,6-Trichlorophenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,4-Dichlorophenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,4-Dimethylphenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,4-Dinitrophenol	BRL	630		ug/L	189587	5	04/19/2014 00:24	YH

Qualifiers:
- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Date: 25-Apr-14

Analytical Environmental Services, Inc

Client:	Hepaco, Inc.	Client Sample ID:	HABERSHAM TANK #1
Project Name:	Habersham Tank #1	Collection Date:	4/17/2014 10:00:00 AM
Lab ID:	1404I63-001	Matrix:	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
PRIORITY POLLUTANT-SEMIVOLATILE ORGANICS E625				(E625)				
2,4-Dinitrotoluene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2,6-Dinitrotoluene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2-Chloronaphthalene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2-Chlorophenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
2-Nitrophenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
3,3'-Dichlorobenzidine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
4,6-Dinitro-2-methylphenol	BRL	500		ug/L	189587	5	04/19/2014 00:24	YH
4-Bromophenyl phenyl ether	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
4-Chloro-3-methylphenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
4-Chlorophenyl phenyl ether	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
4-Nitrophenol	BRL	630		ug/L	189587	5	04/19/2014 00:24	YH
Acenaphthene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Acenaphthylene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Anthracene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benz(a)anthracene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benzidine	BRL	2000		ug/L	189587	5	04/19/2014 00:24	YH
Benzo(a)pyrene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benzo(b)fluoranthene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benzo(g,h,i)perylene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Benzo(k)fluoranthene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Bis(2-chloroethoxy)methane	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Bis(2-chloroethyl)ether	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Bis(2-chloroisopropyl)ether	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Bis(2-ethylhexyl)phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Butyl benzyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Chrysene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Di-n-butyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Di-n-octyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Dibenz(a,h)anthracene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Diethyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Dimethyl phthalate	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Fluoranthene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Fluorene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Hexachlorobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Hexachlorobutadiene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Hexachlorocyclopentadiene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Hexachloroethane	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Indeno(1,2,3-cd)pyrene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Isophorone	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
N-Nitrosodi-n-propylamine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
N-Nitrosodimethylamine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH

Qualifiers:
- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Note See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc Date: 25-Apr-14

Client:	Hepaco, Inc.	Client Sample ID:	HABERSHAM TANK #1
Project Name:	Habersham Tank #1	Collection Date:	4/17/2014 10:00:00 AM
Lab ID:	1404163-001	Matrix:	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
PRIORITY POLLUTANT-SEMIVOLATILE ORGANICS E625				(E625)				
N-Nitrosodiphenylamine	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Naphthalene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Nitrobenzene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Pentachlorophenol	BRL	630		ug/L	189587	5	04/19/2014 00:24	YH
Phenanthrene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Phenol	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Pyrene	BRL	250		ug/L	189587	5	04/19/2014 00:24	YH
Surr: 2,4,6-Tribromophenol	0	51.5-124	S	%REC	189587	5	04/19/2014 00:24	YH
Surr: 2-Fluorobiphenyl	43	51.7-118	S	%REC	189587	5	04/19/2014 00:24	YH
Surr: 2-Fluorophenol	54.2	26-120		%REC	189587	5	04/19/2014 00:24	YH
Surr: 4-Terphenyl-d14	99.5	45.2-137		%REC	189587	5	04/19/2014 00:24	YH
Surr: Nitrobenzene-d5	95	42-120		%REC	189587	5	04/19/2014 00:24	YH
Surr: Phenol-d5	42.8	12.3-120		%REC	189587	5	04/19/2014 00:24	YH
Phosphorus, ortho E365.1								
Phosphorus, Total Orthophosphate (As P)	56.0	5.00		mg/L	R265744	500	04/17/2014 17:47	LV
Phenolics, Total Recoverable E420.1				(E420.1)				
Phenolics, Total Recoverable	0.43	0.05		mg/L	190056	1	04/23/2014 14:35	LW
Nitrogen, Ammonia (as N) E350.1				(E350.1)				
Nitrogen, Ammonia (As N)	BRL	2.00		mg/L	190109	10	04/24/2014 15:13	LV
Hydrogen Ion (pH) by SM4500 H+ B								
pH	9.60	0.0100	H	pH Units	R266154	1	04/23/2014 09:15	OM
Biochemical Oxygen Demand (5 Day) by SM5210B								
Biochemical Oxygen Demand	3320	500		mg/L	189874	100	04/17/2014 16:00	MG

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Hepaco Work Order Number 1404I63

Checklist completed by [signature] 4/17/14
Signature Date

Carrier name: FedEx __ UPS __ Courier __ Client ✓ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes ✓ No __ Not Present __

Container/Temp Blank temperature in compliance? (4°C±2)* Yes ✓ No __

Cooler #1 3.2°C Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? 4/22/14 Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted __ Yes ✓ No __

Water - pH acceptable upon receipt? Yes __ No ✓ Not Applicable __

Adjusted? _____ Checked by [initials]

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

\\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 25-Apr-14

Client: Hepaco, Inc.
Project: Habersham Tank #1
Lab Order: 1404I63

Dates Report

Lab Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	TCLP Date	Prep Date	Analysis Date
1404I63-001A	HABERSHAM TANK #1	4/17/2014 10:00:00AM	WASTE Water	PP-VOLATILES		04/17/2014	04/19/2014
1404I63-001B	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Trace Elements by ICP/MS		04/21/2014	04/22/2014
1404I63-001B	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	TOTAL MERCURY		04/23/2014	04/23/2014
1404I63-001C	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Phosphorus, ortho			04/17/2014
1404I63-001D	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	PP-SEMIVOLATILE ORGANICS		04/18/2014	04/19/2014
1404I63-001E	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Nitrogen, Ammonia (as N)		04/23/2014	04/24/2014
1404I63-001F	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Biochemical Oxygen Demand by SM5210B		04/17/2014	04/17/2014
1404I63-001F	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Hydrogen Ion (pH) by SM4500 H+ B			04/23/2014
1404I63-001F	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Residue, Dissolved (TDS) by SM2540C		04/18/2014	04/18/2014
1404I63-001F	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Residue, Suspended (TSS) by SM2540D		04/23/2014	04/23/2014
1404I63-001G	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Phenolics, Total Recoverable		04/22/2014	04/23/2014
1404I63-001H	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Oil and Grease		04/24/2014	04/24/2014
1404I63-001I	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Sulfide by SM4500-S2-F			04/22/2014
1404I63-001J	HABERSHAM TANK #1	4/17/2014 10:00:00AM	Waste Water	Total Cyanide		04/23/2014	04/23/2014

BLANK PAGE

#7

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

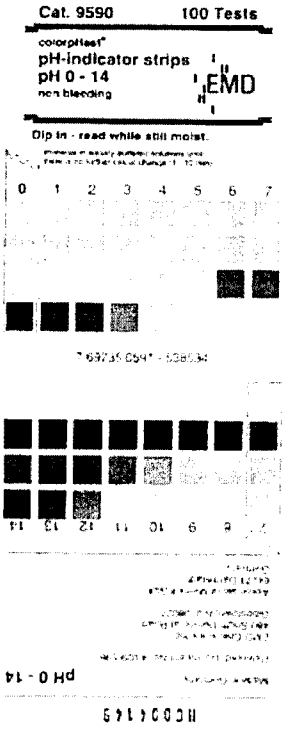
HABERSHAM METAL PRODUCTS COMPANY
FOLLOW UP FROM TELECONFERENCE DATED THURSDAY 4-13-17
APRIL 28, 2017

The following information is in response to our call on April 13, 2017. We will be available to answer any questions or clarify information as necessary. Our hope is the information provided will satisfy your inquiry.

1) Provide copies of pH logs for discharges going to sewer.

The company has not kept records of pH readings for the rinse water from Tank #2 and Tank #4. pH readings from Tank #5 were also never recorded. pH levels have been recorded for the wash Tank #1 and wash Tank #3 only. The wash water from Tank #1, Tank #3, and Tank #5 has not been sent to the city Publicly Owned Treatment Works (POTW) since 1997. Prior to 1997, the wastewater from Tank #1, Tank #3, and Tank #5 was discharged in accordance with flow recommendations and instructions by Rindt McDuff, who was the environmental consultant for both Habersham Metal Products Company and the City of Baldwin.

The operational pH level for Tank #1 is a pH of 10. The operational pH level for Tank #3 is a pH of 5. An example of the record for the operational pH levels for Tank #1 and Tank #3 from February 28, 2017 through April 13, 2017 is attached in Appendix A. A random sampling of operational pH readings for Tank #3 from January 15, 1992 through May 18, 1998 are also presented in Appendix A. Additional daily recordings similar to these records for Tank #3 can be provided if necessary; however, please be aware that there is quite an administrative burden to locate and compile this information.



pH levels for wash Tank #1 and wash Tank #3 were recorded using paper strips and a color chart as shown in the photograph (right). Records for operational pH for Tank #1 and Tank #3 were kept daily. If operational pH readings were not where desired, washing chemicals were added.

pH levels for the spray rinse from Tank #2 and Tank #4 have never been recorded, because the spray rinse came directly from the City's potable water supply, and company procedure was to rinse off the parts using a typical garden type hose prior to inserting them into the spray rinse tank. Therefore, the pH level of the spray rinse water would have had minimal deviation from the City's potable water supply.

(Cont. Page 2)

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

Spray rinse Tank #2 would have had minimal residue from Tank#1, and spray rinse Tank #4 would have had minimal residue from Tank #3. Each 40 gallon spray was then mixed in the drain line and then pumped to the property sewer line which was then mixed with the company's sanitary wastewater.

Therefore, it was understood that pH testing of the spray rinse discharge was not necessary, because the pH level was anticipated to have been at or near neutral.

2) Any analytical records for the discharges such as metal concentrations in the wastewater for the last 3-5 years.

It was understood by the company that the metal content in the wash tanks was below limits for all trace metals except for Zinc. The company kept voluntary records of dissolved Zinc in the spray rinse Tank #2 and spray rinse Tank #4 during the calendar years 2010 and 2011, but since the sampling was understood to be voluntary, the company stopped taking samples in 2011.

Records for dissolved Zinc for the calendar years 2010 and 2011 are presented in Appendix B and Appendix C, respectively. Please note that in Appendix B and Appendix C, the sample identification "#1 Rinse Tank" correlates to the process Tank #2, and the sample identification "#2 Rinse Tank" correlates to the process Tank #4.

The procedure at that time was to close the drain and take grab samples at the bottom of Tank #2 and Tank #4 so that the sample taken would be at the most concentrated level.

From the testing, it appears that the dissolved Zinc level from the spray rinse in Tank #4 was consistently very low, being at or below reporting limits (BRL). It appears that Zinc levels for the spray rinse in Tank #2 were slightly higher, but remained consistently below the local limit set forth by the City Ordinance.

The spray rinse for Tank #2 and the spray rinse for Tank #4 mix in the pipe at the drain exit and the two rinse water tanks mix again with the company's sanitary wastewater discharge.

Testing for dissolved Zinc was never resumed because neither Rindt McDuff, who was the environmental consultant for both the City of Baldwin and for Habersham Metal Products Company, nor the City of Baldwin instructed the company to monitor their discharges. Through training of the operators, the company worked to ensure that minimal spillage from Tank #1 and Tank #3 into rinse Tank #2 and Tank #4 occurred.

(Cont. Page 3)

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

3) The most recent flow rates before disconnecting from the sewer system (December 2016).

Flow balance diagrams for before the sewer disconnect and after the sewer disconnect are presented in Appendix D. All flow balances are engineering estimates. The flow balance before the sewer disconnect is based on ten washes per day (ten spray rinses from Tank #2 and ten spray rinses from Tank #4) for a total of 880 gallons of spray rinse per day introduced to the company's sewer outfall for an estimated 24% of the company's total sewer discharge.

Our understanding is that at no time prior to the sewer disconnect in December 2016 did the company exceed the City Ordinance permitting limit of 5,000 gallons per day of non-domestic wastewater.

Submitted by:

HABERSHAM METAL PRODUCTS COMPANY, INC.

I certify under 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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the 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 knowing violations.

James A. Stapleton Jr., P.E.
C.E.O. - Habersham Metal Products Company

4/28/17
Date

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY,

APPENDIX A

Habersham Metal Products Company
Cleaning Tank Data Sheet

Stage		Tank 1						Tank 3						Tank 5	
Gallon Capacity		Houghto-Clean 8150 3500 Gallons						Houghto-Prep ZP3 3500 Gallons						Houghto-LuPrep 601 3500 Gallons	
Initial Charge		110 Gallons						60 Gallons						1 Gallon	
		Total Alkalinity Test						ZP3 Drop Test							
Chemicals		Bromophenol Blue	1.0 Normal Sulfuric Acid	% HC 8150	Strips			Phenolphthalein Indicator	1.0 N Sodium Hydroxide						
Operating		Drops	Drops	Conc. %	pH	Temp	Adds	Drops	Drops	Conc. %	pH	Temp	Adds	Add 16oz	Temp
Date	Time	3 to 5	Count	3 to 4.5	9.0 - 11.0	145 - 160F		4	Count	1.25 to 3.25	4.5 to 5.5	110 - 130F		Every 2 Weeks	125 - 140F
3-28		3	10	4.0	10	150		4	10	1.5	5	120			125
3-1		3	10	4.0	10	150		4	10	1.5	5	120			125
3-2		3	10	4.0	10	150		4	10	1.5	5	120			125
3-6		3	10	4.0	10	150		4	10	1.5	5	120			125
3-7		3	10	4.0	10	150		4	10	1.5	5	120			125
3-8		3	10	4.0	10	150		4	10	1.5	5	120			125
3-9		3	10	4.0	10	150		4	10	1.5	5	120			125
3-13		3	10	4.0	10	150		4	10	1.5	5	120			125
3-14		3	10	4.0	10	150		4	10	[illegible]	5	120			125
3-15		3	10	4.0	10	150		4	10	1.5	5	120			125
3-16		3	10	4.0	10	150		4	10	1.5	5	120			125
3-20		3	10	4.0	10	150		4	10	1.5	5	120			125
3-21		3	10	4.0	10	150		4	10	1.5	5	120			125
3-22		3	10	4.0	10	150		4	10	1.5	5	120			125
3-23		3	10	4.0	10	150		4	10	1.5	5	120			125
3-27		3	10	4.0	10	150		4	10	1.5	5	120			125
3-28		3	10	4.0	10	150		4	10	1.5	5	120			125
3-29		3	10	4.0	10	150		4	10	1.5	5	120			125
3-30		3	10	4.0	10	150		4	10	1.5	5	120			125
4-3		3	10	4.0	10	150		4	10	1.5	5	120			125
4-4		3	10	4.0	10	150		4	10	1.5	5	120			125
4-5		3	10	4.0	10	150		4	10	1.5	5	120			125
4-6		3	10	4.0	10	150		4	10	1.5	5	120			125
4-10		3	10	4.0	10	150		4	10	1.5	5	120			125
4-11		3	10	4.0	10	150		4	10	1.5	5	120			125
4-12		3	10	4.0	10	150		4	10	1.5	5	120			125
4-[illegible]		3	10	4.0	10	150		4	10	1.5	5	120			125
1															

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 06251992 Taken by:JEFF CLEVELAND

#1 TANK	#3 TANK	#5 TANK
Temp. 130	Temp. 150	Temp. 0_
Conc. 3.90	Conc. 1.02	Conc. ___
	P.H. 7__	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 01151992 Taken by:JEFF CLEVELAND

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 0_
Conc. 4__	Conc. ___	Conc. ___
	P.H. 4__	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 01141992

Taken by:GARY SMITH

#1 TANK	#3 TANK	#5 TANK
Temp. 0_	Temp. 0_	Temp. 0_
Conc. ___	Conc. ___	Conc. ___
	P.H. ___	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 01241992

Taken by:JEFF CLEVELAND

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 0_
Conc. 3__	Conc. ___	Conc. ___
	P.H. 3.5	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 01271992 Taken by:JEFF CLEVELAND

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 0_
Conc. 4__	Conc. ___	Conc. ___
	P.H. 305	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 04291993

Taken by:MATTHEW RAMEY

#1 TANK	#3 TANK	#5 TANK
Temp. 130	Temp. 150	Temp. 0_
Conc. 4.2	Conc. .93	Conc. ___
	P.H. 7__	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 10191993 Taken by:MATTHEW RAMEY

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5__	Conc. 3__	Conc. 1__
	P.H. 4.3	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK

TEMP. - 140
CONC. - 5 to 6%

#3 TANK

TEMP. - 120
CONC. - 2.5% to 4.0%
P. H. - 4.7 to 6.2

#5 TANK

TEMP. - 150
CONC. - 0.9% to 1.2%

==========<- DAILY SETTINGS ->==========

Date: 01201994

Taken by:JOHN BUSH

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5__	Conc. 3.5	Conc. .5_
	P.H. 4.6	

TANK #1- _____

TANK #3- _____

TANK #5- _____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 06231994 Taken by:GREG RAMEY

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5__	Conc. 5__	Conc. .5_
	P.H. 4.2	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 12021994

Taken by:RANDY RAMSEY

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5__	Conc. 4.6	Conc. .765
	P.H. 4.6	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 01241995 Taken by:RANDY RAMSEY

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 6__	Conc. 3.5	Conc. .68
	P.H. 4.8	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 06191995 Taken by:JASON HENSLEY

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 54_	Conc. 4.1	Conc. 1.4
	P.H. 4.2	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 12151995

Taken by:JASON HENSLEY

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5__	Conc. 3.8	Conc. 1.1
	P.H. 4.3	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 02071996

Taken by:JASON HENSLEY

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5__	Conc. 3.6	Conc. 1.3
	P.H. 4.4	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 11071996 Taken by:BRENT CLARK

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 135
Conc. 5__	Conc. 4__	Conc. 1.5
	P.H. 4.4	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 11241997 Taken by:BRENT DOBBS

#1 TANK	#3 TANK	#5 TANK
Temp. 130	Temp. 148	Temp. 150
Conc. 5.6	Conc. 3.6	Conc. 1.5
	P.H. 4.2	

TANK #1- TEMP IS LOW DUE TO DUMPING OF TANK_____

_____

TANK #3- TANK WAS LOW CAUSING TEMP TO RISE DUE TO EVAPORATION_____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 12021997 Taken by:BRENT DOBBS

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5.7	Conc. 5__	Conc. 1.2
	P.H. 4.5	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 12101997

Taken by:BRENT CLARK

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5.0	Conc. 4.8	Conc. 1.2
	P.H. 4.5	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 01151998 Taken by:BRENT CLARK

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 144	Temp. 150
Conc. 5__	Conc. 5__	Conc. 1.5
	P.H. 4.5	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 04011998

Taken by:BRENT CLARK

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5.6	Conc. 3.8	Conc. 1.2
	P.H. 4.5	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 04061998 Taken by:BRENT CLARK

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 140	Temp. 150
Conc. 5.0	Conc. 3.8	Conc. 1.5
	P.H. 4.5	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

==========<- REQUIRED SETTINGS ->==========

#1 TANK	#3 TANK	#5 TANK
TEMP. - 140	TEMP. - 120	TEMP. - 150
CONC. - 5 to 6%	CONC. - 2.5% to 4.0%	CONC. - 0.9% to 1.2%
	P. H. - 4.7 to 6.2	

==========<- DAILY SETTINGS ->==========

Date: 05181998

Taken by:BRENT CLARK

#1 TANK	#3 TANK	#5 TANK
Temp. 140	Temp. 5_	Temp. 150
Conc. 6.0	Conc. 5.0	Conc. 1.2
	P.H. 4.5	

TANK #1- _____

_____

TANK #3- _____

_____

_____

TANK #5- _____

_____

-CR- TO CONT. -F4- TO QUIT

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY

APPENDIX B

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

January 27, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia, GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Order No.: 1001B37

Dear Richard McCoy:

Analytical Environmental Services, Inc. received 2 samples on 1/20/2010 10:45:00 AM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/09-06/30/10.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full and contains 6 total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,

April Crenshaw
Project Manager

3785 PRESIDENTIAL PARKWAY • ATLANTA, GEORGIA 30340 • TEL: (770) 457-8177 • FAX: (770)457-8188

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
AES TEL: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY

Work Order: 1001B37 Habersham Metal

Date 1-19-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total Zn

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	N	REMARKS	No # of Containers
1	#1 Rinse tank	1-19-10	10:00a	✓		WW	✓		1
2	#2 Rinse tank	1-19-10	10:00a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	1-19-10/10:00a	1 Pes	1/20/10 10:45
2		2	
3		3	

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT / / VIA
IN / / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE)
QUOTE #:
PO#: 5843

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- 2 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any)
E-mail? Y / N Fax? Y / N
DATA PACKAGE I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham Work Order Number 1001B37

Checklist completed by Signature Date 1/20/10

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C±2)* Yes ✓ No __ 22 1/20

Cooler # Ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by ZD

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

\L\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc.

Date: *27-Jan-10*

CLIENT: Habersham Metal Products
Project: Habersham Metal
Lab ID: 1001B37-001

Client Sample ID: #1 RINSE TANK
Collection Date: 1/19/2010 10:00:00 AM
Matrix: WASTE WATER

Analyses		Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed
TRACE ELEMENTS BY ICP/MS	E200.8					(E200.2)		Analyst: TAA
Zinc		148	10.0		ug/L	124069	1	1/25/2010 6:01 PM

0.148 mg/L

Qualifiers:				
	*	Value exceeds Maximum Contaminant Level	E	Estimated (Value above quantitation range)
	BRL	Below Reporting Limit	S	Spike Recovery outside limits due to matrix
	H	Holding times for preparation or analysis exceeded	Narr	See Case Narrative
	N	Analyte not NELAC certified	NC	Not Confirmed
	B	Analyte detected in the associated Method Blank	<	Less than Result value
	>	Greater than Result value		

Analytical Environmental Services, Inc.

Date: *27-Jan-10*

CLIENT: Habersham Metal Products
Project: Habersham Metal
Lab ID: 1001B37-002

Client Sample ID: #2 RINSE TANK
Collection Date: 1/19/2010 10:00:00 AM
Matrix: WASTE WATER

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed
TRACE ELEMENTS BY ICP/MS E200.8 (E200.2)							Analyst: TAA
Zinc	BRL	10.0		ug/L	124069	1	1/25/2010 6:07 PM

Qualifiers:

*	Value exceeds Maximum Contaminant Level	E	Estimated (Value above quantitation range)
BRL	Below Reporting Limit	S	Spike Recovery outside limits due to matrix
H	Holding times for preparation or analysis exceeded	Narr	See Case Narrative
N	Analyte not NELAC certified	NC	Not Confirmed
B	Analyte detected in the associated Method Blank	<	Less than Result value
>	Greater than Result value		

Analytical Environmental Services, Inc.

Date: *27-Jan-10*

CLIENT: Habersham Metal Products
Work Order: 1001B37
Project: Habersham Metal

ANALYTICAL QC SUMMARY REPORT

TestCode: Trace Elements by ICP/MS E200.8

Sample ID: **MB-124069** SampType: **MBLK** Batch ID: **124069** Units: **ug/L** Prep Date: **1/20/2010** RunNo: **164010**
Client ID: TestCode: **Trace Elements by ICP/MS E200.8** Analysis Date: **1/21/2010** SeqNo: **3395287**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0		

Sample ID: **LCS-124069** SampType: **LCS** Batch ID: **124069** Units: **ug/L** Prep Date: **1/20/2010** RunNo: **164010**
Client ID: TestCode: **Trace Elements by ICP/MS E200.8** Analysis Date: **1/21/2010** SeqNo: **3395285**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Zinc	102.9	10.0	100	0	103	85	115	0	0		

Sample ID: **1001992-001AMS** SampType: **MS** Batch ID: **124069** Units: **ug/L** Prep Date: **1/20/2010** RunNo: **164010**
Client ID: TestCode: **Trace Elements by ICP/MS E200.8** Analysis Date: **1/21/2010** SeqNo: **3395292**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Zinc	358.8	10.0	100	259.1	99.7	70	130	0	0		

Sample ID: **1001992-001AMSD** SampType: **MSD** Batch ID: **124069** Units: **ug/L** Prep Date: **1/20/2010** RunNo: **164010**
Client ID: TestCode: **Trace Elements by ICP/MS E200.8** Analysis Date: **1/21/2010** SeqNo: **3395295**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Zinc	362.2	10.0	100	259.1	103	70	130	358.8	0.943	20	

Qualifiers:

<	Less than Result value	>	Greater than Result value	B	Analyte detected in the associated Method Blank
BRL	Below Reporting Limit	E	Estimated value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Estimated value detected below Reporting Limit	N	Analyte not NELAC certified	R	RPD outside limits due to matrix
Rpt Lim	Reporting Limit	S	Spike Recovery outside limits due to matrix		

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

February 25, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia, GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metals

Order No.: 1002C35

Dear Richard McCoy:

Analytical Environmental Services, Inc. received 2 samples on 2/16/2010 3:30:00 PM for the analyses presented in the following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/09-06/30/10.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full and contains 6 total pages (including cover letter).

If you have any questions regarding these test results, please feel free to call.

Sincerely,

Brian Rohr
Project Manager

3785 PRESIDENTIAL PARKWAY • ATLANTA, GEORGIA 30340 • TEL: (770) 457-8177 • FAX: (770)457-8188

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
AES TEL: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

CHAIN OF CUSTODY

Work Order: 1002C35 Habersham Metal

Date 2-15-2012 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total Zn

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	Total Zn (N)	REMARKS	No # of Containers
1	#1 Rinse tank	2-15-10	9:45a	✓		WW	✓		1
2	#2 Rinse tank	2-15-10	9:45a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	2-15-10/9:45a	1 [illegible]	2/16/10
2		2	15:30
3		3	

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT / / VIA:
IN / / VIA:
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #:
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE):
QUOTE #: PO# 6254

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- (✓) Standard 5 Business Days
- ( ) 2 Business Day Rush
- ( ) Next Business Day Rush
- ( ) Same Day Rush (auth req.)
- ( ) Other

STATE PROGRAM (if any):
E-mail? Y / N Fax? Y / N
DATA PACKAGE I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original; Yellow Copy - Client

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham Work Order Number 1002C35

Checklist completed by [signature] 2/16/10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? ~~(4°C±2)~~* 2D 2/16 Yes ✓ No __

Cooler #1 Ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by [signature]

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

\L\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc.

Date: *22-Feb-10*

CLIENT: Habersham Metal Products
Project: Habersham Metals
Lab ID: 1002C35-001

Client Sample ID: #1 RINSE TANK
Collection Date: 2/15/2010 9:45:00 AM
Matrix: WASTE WATER

Analyses		Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed
TRACE ELEMENTS BY ICP/MS	E200.8					(E200.2)		Analyst: JY
Zinc		466	10.0		ug/L	125274	1	2/19/2010 12:15 AM

0.466 mG/L

Qualifiers:				
	*	Value exceeds Maximum Contaminant Level	E	Estimated (Value above quantitation range)
	BRL	Below Reporting Limit	S	Spike Recovery outside limits due to matrix
	H	Holding times for preparation or analysis exceeded	Narr	See Case Narrative
	N	Analyte not NELAC certified	NC	Not Confirmed
	B	Analyte detected in the associated Method Blank	<	Less than Result value
	>	Greater than Result value		

Analytical Environmental Services, Inc.

Date: *22-Feb-10*

CLIENT: Habersham Metal Products
Work Order: 1002C35
Project: Habersham Metals

ANALYTICAL QC SUMMARY REPORT

TestCode: Trace Elements by ICP/MS E200.8

Sample ID: **MB-125274** SampType: **MBLK** Batch ID: **125274** Units: **ug/L** Prep Date: **2/17/2010** RunNo: **165937**
Client ID: TestCode: **Trace Elements by ICP/MS E200.8** Analysis Date: **2/18/2010** SeqNo: **3438178**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0		

Sample ID: **LCS-125274** SampType: **LCS** Batch ID: **125274** Units: **ug/L** Prep Date: **2/17/2010** RunNo: **165937**
Client ID: TestCode: **Trace Elements by ICP/MS E200.8** Analysis Date: **2/18/2010** SeqNo: **3438174**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Zinc	96.54	10.0	100	0	96.5	85	115	0	0		

Sample ID: **1002C35-002AMS** SampType: **MS** Batch ID: **125274** Units: **ug/L** Prep Date: **2/17/2010** RunNo: **165937**
Client ID: **#2 RINSE TANK** TestCode: **Trace Elements by ICP/MS E200.8** Analysis Date: **2/18/2010** SeqNo: **3438185**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Zinc	545	10.0	100	454.6	90.4	70	130	0	0		

Sample ID: **1002C35-002AMSD** SampType: **MSD** Batch ID: **125274** Units: **ug/L** Prep Date: **2/17/2010** RunNo: **165937**
Client ID: **#2 RINSE TANK** TestCode: **Trace Elements by ICP/MS E200.8** Analysis Date: **2/18/2010** SeqNo: **3438189**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Zinc	555.1	10.0	100	454.6	101	70	130	545	1.84	20	

Qualifiers:

<	Less than Result value	>	Greater than Result value	B	Analyte detected in the associated Method Blank
BRL	Below Reporting Limit	E	Estimated value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Estimated value detected below Reporting Limit	N	Analyte not NELAC certified	R	RPD outside limits due to matrix
Rpt Lim	Reporting Limit	S	Spike Recovery outside limits due to matrix		

Analytical Environmental Services, Inc.

Date: *22-Feb-10*

CLIENT:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project:	Habersham Metals	**Collection Date:**	2/15/2010 9:45:00 AM
Lab ID:	1002C35-002	**Matrix:**	WASTE WATER

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed
TRACE ELEMENTS BY ICP/MS E200.8					(E200.2)		Analyst: JY
Zinc	455	10.0		ug/L	125274	1	2/18/2010 11:30 PM

0.455 Mg/L

Qualifiers:				
	*	Value exceeds Maximum Contaminant Level	E	Estimated (Value above quantitation range)
	BRL	Below Reporting Limit	S	Spike Recovery outside limits due to matrix
	H	Holding times for preparation or analysis exceeded	Narr	See Case Narrative
	N	Analyte not NELAC certified	NC	Not Confirmed
	B	Analyte detected in the associated Method Blank	<	Less than Result value
	>	Greater than Result value		

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

March 24, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy:

Order No: 1003C82

Analytical Environmental Services, Inc. received 2 samples on 3/16/2010 11:20:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/09-06/30/10.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

[illegible] • [illegible] • [illegible] • [illegible] • FAX: [illegible]

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL. (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY 1003C82

Work Order Habersham Metal

Date 3-15-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 269 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	PRESERVATION (See codes) N	REMARKS	No. of Containers
1	#1 Rinse tank	3-15-10	10:00a	✓		WW	✓		1
2	#2 Rinse tank	3-15-10	10:00a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	3-15-10/10:00a	1 [illegible]	3-16-10 11:20
2		2	
3		3	

SPECIAL INSTRUCTIONS COMMENTS

SHIPMENT METHOD
OUT / VIA
IN / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER _____

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #
SITE ADDRESS: 269 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE)
QUOTE # _____ PO# 6772

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- (✓) Standard 5 Business Days
- ( ) 2 Business Day Rush
- ( ) Next Business Day Rush
- ( ) Same Day Rush (auth req.)
- ( ) Other _____

STATE PROGRAM (if any) _____
E-mail? Y N Fax? Y N
DATA PACKAGE I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY, IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 24-Mar-10

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Lab Order	1003C82	**Tag Number:**	
Project:	Habersham Metal	**Collection Date:**	3/15/2010 10:00:00 AM
Lab ID:	1003C82-001A	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	604	10.0		ug/l	126668	1	03/23/2010 14:49	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Nar See case narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc **Date:** 24-Mar-10

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Lab Order	1003C82	**Tag Number:**	
Project:	Habersham Metal	**Collection Date:**	3/15/2010 10:00:00 AM
Lab ID:	1003C82-002A	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	464	10.0		ug/l	126668	1	03/23/2010 14:55	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham Metal Work Order Number 1003C82

Checklist completed by [signature] 3-16-10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C±2)* [initials] 3/10 Yes ✓ No __

Cooler #1 Ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by [initials]

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

L:\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 24-Mar-10

Client: Habersham Metal Products
Project: Habersham Metal
Lab Order: 1003C82

Dates Report

Lab Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	TCLP Date	Prep Date	Analysis Date
1003C82-001A	#1 RINSE TANK	3/15/2010 10:00:00AM	Waste Water	Trace Elements by ICP/MS		03/18/2010	03/20/2010
1003C82-001A	#1 RINSE TANK	3/15/2010 10:00:00AM	Waste Water	Trace Elements by ICP/MS		03/18/2010	03/23/2010
1003C82-002A	#2 RINSE TANK	3/15/2010 10:00:00AM	Waste Water	Trace Elements by ICP/MS		03/18/2010	03/20/2010
1003C82-002A	#2 RINSE TANK	3/15/2010 10:00:00AM	Waste Water	Trace Elements by ICP/MS		03/18/2010	03/23/2010

Analytical Environmental Services, Inc

Date: 24-Mar-10

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1003C82

ANALYTICAL QC SUMMARY REPORT

BatchID: 126668

Sample ID: **MB-126668** Client ID:
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **03/18/2010** Run No: **167827**
BatchID: **126668** Analysis Date: **03/19/2010** Seq No: **3480494**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-126668** Client ID:
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **03/18/2010** Run No: **167827**
BatchID: **126668** Analysis Date: **03/19/2010** Seq No: **3480493**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	109.5	10.0	100	0	110	85	115	0	0	0	

Sample ID: **1003C02-002AMS** Client ID:
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **03/18/2010** Run No: **167827**
BatchID: **126668** Analysis Date: **03/19/2010** Seq No: **3480498**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	138.7	10.0	100	33.49	105	70	130	0	0	0	

Sample ID: **1003C02-002AMSD** Client ID:
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **03/18/2010** Run No: **167827**
BatchID: **126668** Analysis Date: **03/19/2010** Seq No: **3480499**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	140.4	10.0	100	33.49	107	70	130	138.7	1.22	20	

Qualifiers:
- Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Rpt Lim Reporting Limit
- Less than Result value
- J Estimated Value above quantitation range
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

April 26, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy:

Order No: 1004F01

Analytical Environmental Services, Inc. received 2 samples on 4/20/2010 10:25:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/09-06/30/10.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY

10041-01

Work Order Habersham Metal

Date: 4-19-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	Total ZN	REMARKS	No. # of Containers
1	#1 Rinse tank	4-19-10	10:00 a	✓		WW	✓		1
2	#2 Rinse tank	4-19-10	10:00 a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	4-19-10/10:00 a	1 [illegible]	4-20-10 10:2[illegible]
2		2	
3		3	

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #:
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE):
QUOTE #:
PO# 7338

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- 2 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any)
E-mail? Y / N; Fax? Y / N
DATA PACKAGE: I II III IV

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT / / VIA
IN / / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 26-Apr-10

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	4/19/2010 10:00:00 AM
Lab ID:	1004E01-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	333	10.0		ug/L	128281	1	04/23/2010 22:46	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value

Analytical Environmental Services, Inc

Date: 26-Apr-10

Client: Habersham Metal Products
Project: Habersham Metal
Lab ID: 1004E01-002

Client Sample ID: #2 RINSE TANK
Collection Date: 4/19/2010 10:00:00 AM
Matrix: Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	292	10.0		ug/L	128281	1	04/23/2010 23:10	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- J Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Note See case narrative
- ND Not confirmed
- Less than Result value

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham metal Work Order Number 1004F01

Checklist completed by [signature] 4-20-10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C ±2)* Yes ✓ No __ 20.4/20

Cooler #1 Ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by [signature]

Sample Condition: Good ✓ Other(Explain) __

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance

* Samples do not have to comply with the given range for certain parameters.

Analytical Environmental Services, Inc

Date: 26-Apr-10

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1004F01

ANALYTICAL QC SUMMARY REPORT

BatchID: 128281

Sample ID: **MB-128281** Client ID:
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **04/21/2010** Run No: **170108**
BatchID: **128281** Analysis Date: **04/21/2010** Seq No: **3530212**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-128281** Client ID:
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **04/21/2010** Run No: **170108**
BatchID: **128281** Analysis Date: **04/21/2010** Seq No: **3530209**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	113.2	10.0	100	0	113	85	115	0	0	0	

Sample ID: **1004E40-001AMS** Client ID:
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **04/21/2010** Run No: **170108**
BatchID: **128281** Analysis Date: **04/21/2010** Seq No: **3530216**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	806.8	10.0	100	723.3	83.5	70	130	0	0	0	

Sample ID: **1004E40-001AMSD** Client ID:
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **04/21/2010** Run No: **170108**
BatchID: **128281** Analysis Date: **04/21/2010** Seq No: **3530219**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	814.4	10.0	100	723.3	91.1	70	130	806.8	0.938	20	

Qualifiers:

- Greater than Result value
- BRL Below reporting limit
- E Estimated value, detected below Reporting Limit
- Rpt Lim Reporting Limit
- Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding time for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

May 26, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy: Order No: 1005E17

Analytical Environmental Services, Inc. received 2 samples on 5/18/2010 10:15:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/09-06/30/10.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY

Work Order 1005E17 Habersham Metal

Date 5-17-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 Ext. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total Zn

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	N	REMARKS	No. of Containers
1	#1 Rinse tank	5/17/10	10:00 a	✓		WW	✓		1
2	#2 Rinse tank	5/17/10	10:00 a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	5/17/10 / 10:00 a	1 [illegible]	5/18/10
2		2 [illegible]	5/18 10:15
3		3	

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT / / VIA
IN / / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE)
QUOTE #
PO# 7726

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- 2 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any)
E-mail? Y N Fax? Y N
DATA PACKAGE I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 26-May-10

Client:	Habersham Metal Products	**Client Sample ID:**	# 1 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	5/17/2010 10:00:00 AM
Lab ID:	1005F17-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	572	10.0		ug/L	129785	1	05/25/2010 13:03	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- J Estimated Value above quantitation range
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- ND Not confirmed
- < Less than Result value

Analytical Environmental Services, Inc **Date:** 26-May-10

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	5/17/2010 10:00:00 AM
Lab ID:	1005E17-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	337	10.0		ug/L	129785	1	05/25/2010 13:21	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- ND Not confirmed
- Less than Result value

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham Work Order Number 1005E17

Checklist completed by [signature] 5-18-10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes ✓ No __ Not Present __

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C±2)* Yes ✓ No __ 2D 5/18

Cooler #1 Ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by [signature]

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

L:\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

5 of 7

Analytical Environmental Services, Inc

Date: 26-May-10

Client: Habersham Metal Products
Project: Habersham Metal
Lab Order: 1005E17

Dates Report

Lab Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	TCLP Date	Prep Date	Analysis Date
1005E17-001A	# 1 RINSE TANK	5/17/2010 10:00:00AM	Waste Water	Trace Elements by ICP/MS		05/21/2010	05/25/2010
1005E17-001A	# 1 RINSE TANK	5/17/2010 10:00:00AM	Waste Water	Trace Elements by ICP/MS		05/21/2010	05/25/2010
1005E17-002A	#2 RINSE TANK	5/17/2010 10:00:00AM	Waste Water	Trace Elements by ICP/MS		05/21/2010	05/25/2010

Analytical Environmental Services, Inc

Date: 26-May-10

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1005E17

ANALYTICAL QC SUMMARY REPORT

BatchID: 129785

Sample ID: **MB-129785** Client ID:
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **05/21/2010** Run No: **172584**
BatchID: **129785** Analysis Date: **05/25/2010** Seq No: **3586708**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-129785** Client ID
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **05/21/2010** Run No: **172584**
BatchID: **129785** Analysis Date: **05/25/2010** Seq No: **3586706**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	111.9	10.0	100	0	112	85	115	0	0	0	

Sample ID: **1005E17-001AMS** Client ID: **# 1 RINSE TANK**
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **05/21/2010** Run No: **172584**
BatchID: **129785** Analysis Date: **05/25/2010** Seq No: **3587116**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	690.7	10.0	100	572.5	118	70	130	0	0	0	

Sample ID: **1005E17-001AMSD** Client ID: **# 1 RINSE TANK**
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **05/21/2010** Run No: **172584**
BatchID: **129785** Analysis Date: **05/25/2010** Seq No: **3586711**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	683.3	10.0	100	572.5	111	70	130	690.7	1.08	20	

Qualifiers:

- Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Rpt Lim Reporting Limit
- Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

June 18, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy: Order No: 1006D43

Analytical Environmental Services, Inc. received 2 samples on 6/15/2010 12:30:00 PM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/09-06/30/10.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY

1006D43
Work Order Habersham Metal

Date 6-14-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	Total ZN / N	REMARKS	No. # of Containers
1	#1 Rinse tank	6-14-10	1:30P	✓		WW	✓		1
2	#2 Rinse tank	6-14-10	1:30P	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	6-14-10 / 1:30 P	1 [signature]	6/15/10 12:30
2		2	
3		3	

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT VIA
IN VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE)
QUOTE # PO# 8176

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- ○ 2 Business Day Rush
- ○ Next Business Day Rush
- ○ Same Day Rush (auth req.)
- ○ Other

STATE PROGRAM (if any)
E-mail Y N Fax Y N
DATA PACKAGE I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 18-Jun-10

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	6/14/2010 1:30:00 PM
Lab ID:	1006D43-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	936	10.0		ug/L	130877	1	06/17/2010 13:04	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Note See case narrative
- NC Not confirmed
- < Less than Result value

Analytical Environmental Services, Inc **Date:** 18-Jun-10

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	6/14/2010 1:30:00 PM
Lab ID:	1006D43-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	358	10.0		ug/l	130877	1	06/17/2010 13:28	JY

Qualifiers:

- * Value exceeds maximum contaminant level.
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated (value above quantation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham Metals Work Order Number 1006D43

Checklist completed by Kathy Betsill (Signature) 6/15/10 (Date)

Carrier name: FedEx UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container Temp Blank temperature in compliance? ~~(4°C±2)*~~ KB 6/15/10 Yes ✓ No __

Cooler #1 ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ _____ Checked by KB

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

I:\Quality Assurance\Checklists\Procedures\Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 18-Jun-10

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1006D43

ANALYTICAL QC SUMMARY REPORT

BatchID: 130877

Sample ID: **MB-130877** Client ID:
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **06/15/2010** Run No: **174175**
BatchID: **130877** Analysis Date: **06/17/2010** Seq No: **3621877**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-130877** Client ID:
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **06/15/2010** Run No: **174175**
BatchID: **130877** Analysis Date: **06/17/2010** Seq No: **3621875**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	105.5	10.0	100	0	106	85	115	0	0	0	

Sample ID: **1006C02-001AMS** Client ID:
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **06/15/2010** Run No: **174175**
BatchID: **130877** Analysis Date: **06/17/2010** Seq No: **3621881**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	127.4	10.0	100	26.15	101	70	130	0	0	0	

Sample ID: **1006C02-001AMSD** Client ID:
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **06/15/2010** Run No: **174175**
BatchID: **130877** Analysis Date: **06/17/2010** Seq No: **3621888**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	129.6	10.0	100	26.15	103	70	130	127.4	1.71	20	

Qualifiers:

- > Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Rpt Lim Reporting Limit
- < Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

July 26, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy:

Order No: 1007E82

Analytical Environmental Services, Inc. received 2 samples on 7/20/2010 10:25:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

AES

CHAIN OF CUSTODY

1007E82 Work Order: Habersham Metal

Date 7-19-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	PRESERVATION (See codes) N	REMARKS	No # of Containers
1	#1 Rinse tank	7-19-10	10:00 a	✓		WW	✓		1
2	#2 Rinse tank	7-19-10	10:00 a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY / DATE/TIME
1. Richard McCoy 7-19-10/10:00 a
2.
3.

RECEIVED BY / DATE/TIME
1. Neile 7/20/10 10:25
2.
3.

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT / / VIA
IN / / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE)
QUOTE #: PO#: 8593

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- 3 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any)
E-mail? Y / N Fax? Y / N
DATA PACKAGE: I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfite/Methanol + ice O = Other (specify) NA = None

White Copy - Original; Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 26-Jul-10

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSETANK
Project:	Habersham Metal	**Collection Date:**	7/19/2010 10:00:00 AM
Lab ID:	1007E82-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	3120	10.0		ug/l	132574	1	07/24/2010 11:36	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated Value above quantitation range
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value

Analytical Environmental Services, Inc **Date:** 26-Jul-10

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSETANK
Project:	Habersham Metal	**Collection Date:**	7/19/2010 10:00:00 AM
Lab ID:	1007E82-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	920	10.0		ug/l	132574	1	07/24/2010 12:03	IY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater Than Result value
- J Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not continued
- Less than Result value

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habershaw Metals Work Order Number W07E82

Checklist completed by [signature] 7/22/10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other __

Shipping container/cooler in good condition?	Yes ✓	No __	Not Present __
Custody seals intact on shipping container/cooler?	Yes __	No __	Not Present ✓
Custody seals intact on sample bottles?	Yes	No __	Not Present ✓
Container/Temp Blank temperature in compliance? (4°C±2)*	Yes ✓	No __	

Cooler #1 Ambient Cooler #2 _____ Cooler #3 CH 7/22/10 Cooler #4 _____ Cooler#5 _____ Cooler #6 __

Chain of custody present?	Yes ✓	No __
Chain of custody signed when relinquished and received?	Yes ✓	No __
Chain of custody agrees with sample labels?	Yes ✓	No __
Samples in proper container/bottle?	Yes ✓	No __
Sample containers intact?	Yes ✓	No __
Sufficient sample volume for indicated test?	Yes ✓	No __
All samples received within holding time?	Yes ✓	No
Was TAT marked on the COC?	Yes ✓	No __
Proceed with Standard TAT as per project history?	Yes __	No __ Not Applicable ✓
Water - VOA vials have zero headspace?	No VOA vials submitted ✓	Yes __ No __
Water - pH acceptable upon receipt?	Yes ✓	No __ Not Applicable __

Adjusted? _____ Checked by CH

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

\LA\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1007E82

Date: 26-Jul-10

ANALYTICAL QC SUMMARY REPORT

BatchID: 132574

Sample ID: **MB-132574** Client ID:
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **07/22/2010** Run No: **176650**
BatchID: **132574** Analysis Date: **07/24/2010** Seq No: **3675126**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-132574** Client ID:
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **07/22/2010** Run No: **176650**
BatchID: **132574** Analysis Date: **07/24/2010** Seq No: **3675125**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	108.3	10.0	100	0	108	85	115	0	0	0	

Sample ID: **1007E76-002AMS** Client ID:
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **07/22/2010** Run No: **176650**
BatchID: **132574** Analysis Date: **07/24/2010** Seq No: **3675129**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	812.6	10.0	100	705.1	108	70	130	0	0	0	

Sample ID: **1007E76-002AMSD** Client ID:
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **07/22/2010** Run No: **176650**
BatchID: **132574** Analysis Date: **07/24/2010** Seq No: **3675130**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	821.8	10.0	100	705.1	117	70	130	812.6	1.13	20	

Qualifiers:

- Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- RPT Lim Reporting Limit
- Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

August 30, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy:

Order No: 1008E00

Analytical Environmental Services, Inc. received 2 samples on August 18, 2010 12:30 pm for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

AES

CHAIN OF CUSTODY

100 EUC
Work Order: Habersham Metal

Date: 8-17-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 Ext. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	PRESERVATION (See codes) N	REMARKS	No # of Containers
1	#1 Rinse tank	8-17-10	7:30 a	✓		WW	✓		1
2	#2 Rinse tank	8-17-10	7:30 a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY / DATE/TIME
1. Richard McCoy 8-17-10 / 4:30 P.
2.
3.

RECEIVED BY / DATE/TIME
1. [illegible] 8/18/10 12:30
2.
3.

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #:
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE):
QUOTE #: PO#: 9124

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- ○ 2 Business Day Rush
- ○ Next Business Day Rush
- ○ Same Day Rush (auth req.)
- ○ Other

STATE PROGRAM (if any):
E-mail? Y / N Fax? Y / N
DATA PACKAGE: I II III IV

SPECIAL INSTRUCTIONS/COMMENTS:

SHIPMENT METHOD
OUT / / VIA
IN / / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original; Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 30-Aug-10

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	8/17/2010 7:30:00 AM
Lab ID:	1008E00-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	597	10.0		ug/L	133920	1	08/26/2010 16:04	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- J Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Note See case narrative
- ND Not detected
- < Less than Result value

BLANK PAGE

#18

Analytical Environmental Services, Inc **Date:** 30-Aug-10

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	8/17/2010 7:30:00 AM
Lab ID:	1008E00-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	198	10.0		ug/l	133920	1	08/26/2010 16:10	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding time for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Haberstram Metal Products Work Order Number 1008E00

Checklist completed by A. Kowalski 8/18/10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition?	Yes ✓	No __	Not Present __
Custody seals intact on shipping container/cooler?	Yes ✓	No __	Not Present __
Custody seals intact on sample bottles?	Yes __	No __	Not Present ✓
Container/Temp Blank temperature in compliance? (AK 8/18/10) ~~(4°C±2)~~*	Yes ✓	No __	

Cooler #1 ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present?	Yes ✓	No __
Chain of custody signed when relinquished and received?	Yes ✓	No __
Chain of custody agrees with sample labels?	Yes ✓	No __
Samples in proper container/bottle?	Yes ✓	No __
Sample containers intact?	Yes ✓	No __
Sufficient sample volume for indicated test?	Yes ✓	No __
All samples received within holding time?	Yes ✓	No __
Was TAT marked on the COC?	Yes ✓	No __
Proceed with Standard TAT as per project history?	Yes __	No __ Not Applicable ✓
Water - VOA vials have zero headspace?	No VOA vials submitted ✓	Yes __ No __
Water - pH acceptable upon receipt?	Yes ✓	No __ Not Applicable __

Adjusted? _____ Checked by AK

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

M:\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 30-Aug-10

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1008I-00

ANALYTICAL QC SUMMARY REPORT

BatchID: 133920

Sample ID: **MB-133920** Client ID: Units: **ug/L** Prep Date: **08/19/2010** Run No: **178903**
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **133920** Analysis Date: **08/25/2010** Seq No: **3722609**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-133920** Client ID: Units: **ug/L** Prep Date: **08/19/2010** Run No: **178903**
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **133920** Analysis Date: **08/25/2010** Seq No: **3722605**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	105.0	10.0	100	0	105	85	115	0	0	0	

Sample ID: **1008D70-001AMS** Client ID: Units: **ug/L** Prep Date: **08/19/2010** Run No: **178903**
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **133920** Analysis Date: **08/25/2010** Seq No: **3722618**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	86.19	10.0	100	0	86.2	70	130	0	0	0	

Sample ID: **1008D70-001AMSD** Client ID: Units: **ug/L** Prep Date: **08/19/2010** Run No: **178903**
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **133920** Analysis Date: **08/25/2010** Seq No: **3723025**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	106.4	100	100	0	106	70	130	86.19	21	20	R

Qualifiers:

- Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Rpt Lim Reporting Limit
- Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

September 27, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy:

Order No: 1009F28

Analytical Environmental Services, Inc. received 2 samples on 9/21/2010 10:20:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

AES

CHAIN OF CUSTODY

1009F28

Work Order: Habersham Metal

Date: 9-20-10 Page 1 of 1

COMPANY: Habersham Metal Products

ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531

PHONE: 706-778-2212 Ext. 118

FAX: 706-778-2769

SAMPLED BY: R. McCoy

SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	Total ZN (N)	REMARKS	No # of Containers
1	#1 Rinse tank	9-20-10	1:00 p	✓		WW	✓		1
2	#2 Rinse tank	9-20-10	1:00 p	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	9-20-10 / 1:00 p	1 [illegible]	9/21/10
2		2	10:20
3		3	

SPECIAL INSTRUCTIONS/COMMENTS:

SHIPMENT METHOD
OUT / / VIA
IN / / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #:
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE):
QUOTE #: PO# 9778

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- 2 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any)
E-mail? Y / N, Fax? Y / N
DATA PACKAGE: I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 27-Sep-10

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	9/20/2010 1:00:00 PM
Lab ID:	1009F28-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	832	10.0		ug/L	135435	1	09/24/2010 11:52	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value

Analytical Environmental Services, Inc **Date:** 27-Sep-10

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	9/20/2010 1:00:00 PM
Lab ID:	1009F28-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	365	10.0		ug/L	135435	1	09/24/2010 11:58	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habershon Work Order Number 1009F28

Checklist completed by PMT 9/21/10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? PT 9/21/10 Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? ~~(4°C±2)~~* Yes ✓ No __

Cooler #1 Ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by PT

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

Analytical Environmental Services, Inc

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1009F28

Date: 27-Sep-10

ANALYTICAL QC SUMMARY REPORT

BatchID: 135435

Sample ID: **MB-135435** Client ID:
SampleType: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** BatchID: **135435**
Prep Date: **09/23/2010** Analysis Date: **09/24/2010**
Run No: **180913** Seq No: **3764500**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-135435** Client ID:
SampleType: **LCS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** BatchID: **135435**
Prep Date: **09/23/2010** Analysis Date: **09/24/2010**
Run No: **180913** Seq No: **3764498**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	100.6	10.0	100	0	101	85	115	0	0	0	

Sample ID: **1009F96-001AMS** Client ID:
SampleType: **MS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** BatchID: **135435**
Prep Date: **09/23/2010** Analysis Date: **09/24/2010**
Run No: **180913** Seq No: **3764503**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	2581	10.0	100	2493	88	70	130	0	0	0	

Sample ID: **1009F96-001AMSD** Client ID:
SampleType: **MSD** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** BatchID: **135435**
Prep Date: **09/23/2010** Analysis Date: **09/24/2010**
Run No: **180913** Seq No: **3764505**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	2597	10.0	100	2493	104	70	130	2581	0.618	20	

Qualifiers:

- > Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Rec Low Reporting Limit
- < Less than Result value
- E Estimated value above quantitation range
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

October 27, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy:

Order No: 1010F23

Analytical Environmental Services, Inc. received 2 samples on 10/19/2010 11:10:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY

Work Order: Habersham Metal

Date: 10-18-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	Total ZN	REMARKS	No # of Containers
1	#1 Rinse tank	10-18-10	11:00 a	✓		WW	✓		1
2	#2 Rinse tank	10-18-10	11:00 a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	10-18-10 4:00 P.	1 [illegible]	10/19/10 11:10
2		2	
3		3	

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #:
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE):
QUOTE #: PO# 10230

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- (✓) Standard 5 Business Days
- ( ) 2 Business Day Rush
- ( ) Next Business Day Rush
- ( ) Same Day Rush (auth req.)
- ( ) Other

STATE PROGRAM (if any):
E-mail? Y / N Fax? Y / N
DATA PACKAGE: I II III IV

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT: VIA
IN: VIA
CLIENT FedEx (UPS) MAIL COURIER
GREYHOUND OTHER

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE

MATRIX CODES: GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc

Date: 27-Oct-10

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	10/18/2010 11:00:00 AM
Lab ID:	1010F23-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	1030	10.0		ug/L	136933	1	10/25/2010 14:57	JY

Qualifiers:

- * Value exceed maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- J Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value

Analytical Environmental Services, Inc **Date:** 27-Oct-10

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	10/18/2010 11:00:00 AM
Lab ID:	1010F23-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	395	10.0		ug/l	136933	1	10/25/2010 15:03	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated Value above quantitation range
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Alabeska Work Order Number 1010F23

Checklist completed by [signature] 10/19/10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? ~~(4°C+2)*~~ ND 10/19 Yes ✓ No __

Cooler #1 Amb Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by ND

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

L:\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 27-Oct-10

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1010F23

ANALYTICAL QC SUMMARY REPORT

BatchID: 136933

Sample ID: **MB-136933** Client ID: Units: **ug/L** Prep Date: **10/22/2010** Run No: **183063**
SampleType: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **136933** Analysis Date: **10/25/2010** Seq No: **3811287**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-136933** Client ID: Units: **ug/L** Prep Date: **10/22/2010** Run No: **183063**
SampleType: **LCS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **136933** Analysis Date: **10/25/2010** Seq No: **3811286**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	101.4	10.0	100	0	101	85	115	0	0	0	

Sample ID: **1010E77-002AMS** Client ID: Units: **ug/L** Prep Date: **10/22/2010** Run No: **183063**
SampleType: **MS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **136933** Analysis Date: **10/25/2010** Seq No: **3811289**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	105.5	10.0	100	0	106	70	130	0	0	0	

Sample ID: **1010E77-002AMSD** Client ID: Units: **ug/L** Prep Date: **10/22/2010** Run No: **183063**
SampleType: **MSD** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **136933** Analysis Date: **10/25/2010** Seq No: **3811293**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	107.1	10.0	100	0	107	70	130	105.5	1.51	20	

Qualifiers:
- Greater than Result value
- BRL Below reporting limit
- E Estimated value detected below Reporting Limit
- Rpt Limit Reporting Limit
- Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

November 26, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy:

Order No: 1011E07

Analytical Environmental Services, Inc. received 2 samples on 11/16/2010 10:35:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
AES TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY 1011E07

Work Order Habersham Metal

Date 11-15-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	N	REMARKS	No. of Containers
1	#1 Rinse tank	11-15-10	10:30 a	✓		WW	✓		1
2	#2 Rinse tank	11-15-10	10:30 a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	11-15-10 / 4:00 p	1 Peter	11/16/10
2		2	10:35
3		3	

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT / / VIA
IN: / / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE)
QUOTE # PO# 10604

RECEIPT
Total # of Containers: 2

Turnaround Time Request
✓ Standard 5 Business Days
○ 2 Business Day Rush
○ Next Business Day Rush
○ Same Day Rush (auth req.)
○ Other

STATE PROGRAM (if any)
E-mail? Y / N, Fax? Y / N
DATA PACKAGE: I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice SM+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 26-Nov-10

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	11/15/2010 10:30:00 AM
Lab ID:	1011L07-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	5130	100		ug/L	138377	10	11/24/2010 12:33	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- J Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- < Less than Result value

Analytical Environmental Services, Inc **Date:** 26-Nov-10

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	11/15/2010 10:30:00 AM
Lab ID:	1011F07-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	2600	10.0		ug/L	138377	1	11/23/2010 21:31	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Nar See case narrative
- NC Not confirmed
- Less than Result value

Analytical Environmental Services, Inc.

Sample Cooler Receipt Checklist

Client Habersham Work Order Number 1011 E07

Checklist completed by N Quintis 11/16/10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other ___

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container Temp Blank temperature in compliance? ~~(4°C+2)*~~ ND 11/16 Yes ✓ No __

Cooler #1 ambient Cooler #2 ___ Cooler #3 ___ Cooler #4 ___ Cooler#5 ___ Cooler #6 ___

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? ___ Checked by ND

Sample Condition Good ✓ Other(Explain) ___

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

I. Quality Assurance/Checklists Procedures Sign-Off Templates Checklists Sample Receipt Checklists Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 26-Nov-10

Client: Habersham Metal Products
Project: Habersham Metal
Lab Order: 1011E07

Dates Report

Lab Sample ID	Client Sample ID	Collection Date	Matrix	Test Name	TCLP Date	Prep Date	Analysis Date
1011E07-001A	#1 RINSE TANK	11/15/2010 10:30:00AM	Waste Water	Trace Elements by ICP/MS		11/19/2010	11/24/2010
1011E07-002A	#2 RINSE TANK	11/15/2010 10:30:00AM	Waste Water	Trace Elements by ICP/MS		11/19/2010	11/23/2010

Analytical Environmental Services, Inc

Date: 26-Nov-10

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1011E07

ANALYTICAL QC SUMMARY REPORT

BatchID: 138377

Sample ID: **MB-138377** Client ID:
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **11/19/2010** Run No: **185390**
BatchID: **138377** Analysis Date: **11/23/2010** Seq No: **3863499**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-138377** Client ID:
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **11/19/2010** Run No: **185390**
BatchID: **138377** Analysis Date: **11/23/2010** Seq No: **3863490**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	99.95	10.0	100	0	100	85	115	0	0	0	

Sample ID: **1011E90-001AMS** Client ID:
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **11/19/2010** Run No: **185390**
BatchID: **138377** Analysis Date: **11/23/2010** Seq No: **3863519**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	119.5	10.0	100	20.14	99.4	70	130	0	0	0	

Sample ID: **1011E90-001AMSD** Client ID:
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **11/19/2010** Run No: **185390**
BatchID: **138377** Analysis Date: **11/23/2010** Seq No: **3863526**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	120.1	10.0	100	20.14	100	70	130	119.5	0.501	20	

Qualifiers:

- Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Rpt Lim Reporting Limit
- Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

December 30, 2010

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy: Order No: 1012170

Analytical Environmental Services, Inc. received 2 samples on 12/21/2010 11:05:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY 1012I70

Work Order Habersham Metal

Date 12-20-10 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	Total ZN	REMARKS	No. of Containers
1	#1 Rinse tank	12-20-10	11:00 a	✓		WW	✓		1
2	#2 Rinse tank	12-20-10	11:00 a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	12-20-10 / 4:00 p	1 Catanga	11:05 12-21-10
2		2	
3		3	

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT / VIA
IN / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE)
QUOTE # P.O. # 11054

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- (✓) Standard 5 Business Days
- ( ) 2 Business Day Rush
- ( ) Next Business Day Rush
- ( ) Same Day Rush (auth req.)
- ( ) Other

STATE PROGRAM (if any)
E-mail? Y / N; Fax? Y / N
DATA PACKAGE I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: 2 of 6 H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 30-Dec-10

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	12/20/2010 11:00:00 AM
Lab ID:	1012170-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	753	10.0		ug/L	139935	1	12/28/2010 21:14	MW

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Sam See case narrative
- ND Not confirmed
- < Less than Result value

Analytical Environmental Services, Inc **Date:** 30-Dec-10

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	12/20/2010 11:00:00 AM
Lab ID:	1012170-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	183	10.0		ug/L	139935	1	12/28/2010 21:32	MW

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- J Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Note See case narrative
- NC Not certified
- Less than Result value

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham Work Order Number 1012170

Checklist completed by [signature] 12/22/10
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present

Custody seals intact on shipping container/cooler? Yes ✓ No __ Not Present __

Custody seals intact on sample bottles? PT 12/22/10 Yes __ No __ Not Present ✓

Container Temp Blank temperature in compliance? ~~(4°C ±2)~~* Yes ✓ No __

Cooler #1 amb. Cooler #2 ____ Cooler #3 ____ Cooler #4 ____ Cooler#5 ____ Cooler #6 ____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? ____ Checked by PT

Sample Condition: Good ✓ Other(Explain) ____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

I:\Quality Assurance\Checklists\Procedures\Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 30-Dec-10

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1012170

ANALYTICAL QC SUMMARY REPORT

BatchID: 139935

Sample ID: **MB-139935** Client ID:
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **12/27/2010** Run No: **187569**
BatchID: **139935** Analysis Date: **12/28/2010** Seq No: **3910360**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-139935** Client ID:
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **12/27/2010** Run No: **187569**
BatchID: **139935** Analysis Date: **12/28/2010** Seq No: **3910358**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	105.9	10.0	100	0	106	85	115	0	0	0	

Sample ID: **1012170-001AMS** Client ID: **#1 RINSE TANK**
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **12/27/2010** Run No: **187569**
BatchID: **139935** Analysis Date: **12/28/2010** Seq No: **3910365**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	850.6	10.0	100	752.7	97.9	70	130	0	0	0	

Sample ID: **1012170-001AMSD** Client ID: **#1 RINSE TANK**
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **12/27/2010** Run No: **187569**
BatchID: **139935** Analysis Date: **12/28/2010** Seq No: **3910369**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	838.1	10.0	100	752.7	85.4	70	130	850.6	1.48	20	

Qualifiers:
- Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Rpt Lim Reporting Limit
- < Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 • Fax (706) 778-2769
www.habershammetal.com.com

HABERSHAM
METAL PRODUCTS COMPANY,

APPENDIX C

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

January 24, 2011

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy: Order No: 1101928

Analytical Environmental Services, Inc. received 2 samples on 1/18/2011 10:00:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Brian Rohr
Project Manager

[illegible] • [illegible] 30340 • TEL: 770 457 8177 • FAX: 770 457 8188

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY 1101928

Work Order Habersham Metal

Date 1-17-11 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 Ext. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	PRESERVATION (See codes) N	REMARKS	No. of Containers
1	#1 Rinse tank	1-17-11	9:30 a	✓		WW	✓		1
2	#2 Rinse tank	1-17-11	9:30 a.	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	1-17-11/4:00 P.	1 [illegible]	1/18/11
2		2	10:00
3		3	

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT: VIA
IN: VIA
CLIENT FedEx UPS MAIL COURIER GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #:
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO: (IF DIFFERENT FROM ABOVE)
QUOTE #: PO# 11337

RECEIPT
Total # of Containers: 2

Turnaround Time Request:
- ✓ Standard 5 Business Days
- 2 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any)
Email? Y/N Fax? Y/N
DATA PACKAGE: I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice SM+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 24-Jan-11

Client:	Habersham Metal Products	**Client Sample ID:**	# 1 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	1/17/2011 9:30:00 AM
Lab ID:	1101928-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	1210	10.0		ug/l	140788	1	01/20/2011 14:45	MW

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value

Analytical Environmental Services, Inc **Date:** 24-Jan-11

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project:	Habersham Metal	**Collection Date:**	1/17/2011 9:30:00 AM
Lab ID:	1101928-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	753	10.0		ug/L	140788	1	01/20/2011 14:51	MW

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- J Estimated value above quantitation limit
- S Spike Recovery outside limits due to matrix
- Nar See narrative
- NC Not confirmed
- < Less than Result value

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habershum Metal Work Order Number 1101928

Checklist completed by MD 1/18/11
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes __ No __ Not Present ✓

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C±2)* Yes ✓ No __

Cooler #1 ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by MD

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

Analytical Environmental Services, Inc

Date: 24-Jan-11

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1101928

ANALYTICAL QC SUMMARY REPORT

BatchID: 140788

Sample ID: **MB-140788** Client ID: Units: **ug/L** Prep Date: **01/19/2011** Run No: **188795**
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **140788** Analysis Date: **01/20/2011** Seq No: **3935713**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-140788** Client ID: Units: **ug/L** Prep Date: **01/19/2011** Run No: **188795**
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **140788** Analysis Date: **01/20/2011** Seq No: **3935712**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	105.7	10.0	100	1.483	104	85	115	0	0	0	

Sample ID: **1101851-001BMS** Client ID: Units: **ug/L** Prep Date: **01/19/2011** Run No: **188795**
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **140788** Analysis Date: **01/20/2011** Seq No: **3935715**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	211.6	10.0	100	98.41	113	70	130	0	0	0	

Sample ID: **1101851-001BMSD** Client ID: Units: **ug/L** Prep Date: **01/19/2011** Run No: **188795**
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **140788** Analysis Date: **01/20/2011** Seq No: **3935716**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	210.8	10.0	100	98.41	112	70	130	211.6	0.379	20	

Qualifiers:

	Greater than Result value		Less than Result value	B	Analyte detected in the associated method blank
BRL	Below reporting limit	E	Estimated (value above quantitation range)	H	Holding time for preparation or analysis exceeded
J	Estimated value detected below Reporting Limit	N	Analyte not NELAC certified	R	RPD outside limits due to matrix
Rpt Lim	Reporting Limit	S	Spike Recovery outside limits due to matrix		

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

March 01, 2011

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metals

Dear Richard McCoy:

Order No: 1102102

Analytical Environmental Services, Inc. received 2 samples on 2/22/2011 10:15:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Kathleen Betsill
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY

1102I02

Work Order Habersham Metal

Date 2-21-11 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	N	REMARKS	No # of Containers
1	#1 Rinse tank	2-21-11	10:30 a	✓		WW	✓		1
2	#2 Rinse tank	2-21-11	10:30 a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY / DATE TIME
1. Richard McCoy 2-21-11 / 4:00p.
2.
3.

RECEIVED BY / DATE TIME
1. Mark 2/22/11
2. 10:15
3.

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT: / VIA
IN: / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #:
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE):
QUOTE #: PO# 11956

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- 2 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any):
E-mail? Y/N Fax? Y/N
DATA PACKAGE: I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original; Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 1-Mar-11

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project Name:	Habersham Metals	**Collection Date:**	2/21/2011 10:30:00 AM
Lab ID:	1102102-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	2430	10.0		ug/L	142486	1	02/24/2011 20:31	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc **Date:** 1-Mar-11

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project Name:	Habersham Metals	**Collection Date:**	2/21/2011 10:30:00 AM
Lab ID:	1102102-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	942	10.0		ug/l	142486	1	02/24/2011 20:50	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Held for over for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Note See case narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Haber Sham Work Order Number 1102 I02

Checklist completed by [signature] 2/22/11
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes ✓ No __ Not Present ✓ MJ 2/22/11

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C±2)* Yes ✓ MJ 2/22/11 No __

Cooler #1 Ambed Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by MJ

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

I. Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 1-Mar-11

Client: Habersham Metal Products
Project Name: Habersham Metals
Workorder: 1102102

ANALYTICAL QC SUMMARY REPORT

BatchID: 142486

Sample ID: **MB-142486** Client ID: Units: **ug/L** Prep Date: **02/23/2011** Run No: **191255**
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **142486** Analysis Date: **02/24/2011** Seq No: **3990405**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-142486** Client ID: Units: **ug/L** Prep Date: **02/23/2011** Run No: **191255**
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **142486** Analysis Date: **02/24/2011** Seq No: **3990402**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	115.0	10.0	100	1.671	113	85	115	0	0	0	

Sample ID: **1102102-001AMS** Client ID: **#1 RINSE TANK** Units: **ug/L** Prep Date: **02/23/2011** Run No: **191255**
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **142486** Analysis Date: **02/24/2011** Seq No: **3990414**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	2467	10.0	100	2432	35	70	130	0	0	0	S

Sample ID: **1102102-001AMSD** Client ID: **#1 RINSE TANK** Units: **ug/L** Prep Date: **02/23/2011** Run No: **191255**
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **142486** Analysis Date: **02/24/2011** Seq No: **3990416**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	2451	10.0	100	2432	19	70	130	2467	0.651	20	S

Qualifiers:

- Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Rpt Lim Reporting Limit
- Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

March 29, 2011

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy:

Order No: 1103J35

Analytical Environmental Services, Inc. received 2 samples on March 22, 2011 10:10 am for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Kathleen Betsill
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
AES TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY

1103035 Work Order: Habersham Metal

Date 3-21-11 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 EXT. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total Zn

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	Preservation	REMARKS	No. # of Containers
1	#1 Rinse tank	3-21-11	10:00a	✓		WW	✓		1
2	#2 Rinse tank	3-21-11	10:00a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	3-21-11/4:00p	1 [illegible]	3/22/11 10:10
2		2	
3		3	

SPECIAL INSTRUCTIONS/COMMENTS:

SHIPMENT METHOD
OUT / / VIA
IN / / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #:
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE):
QUOTE #: PO#: 12300

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- 2 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any):
E-mail? Y / N Fax? Y / N
DATA PACKAGE I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: HCl = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 28-Mar-11

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project Name:	Habersham Metal	**Collection Date:**	3/21/2011 10:00:00 AM
Lab ID:	1103J35-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	1750	10.0		ug/l	143904	1	03/23/2011 22:57	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated (value above quantitation range)
- S Spike Recovery outside limits due to matrix
- Nar See case narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc **Date:** 28-Mar-11

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project Name:	Habersham Metal	**Collection Date:**	3/21/2011 10:00:00 AM
Lab ID:	1103J35-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	705	10.0		ug/L	143904	1	03/23/2011 23:03	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated value above quantitation range
- S Spike Recovery out side limits due to matrix
- Note See case narrative
- NC Not continued
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham Metal Products Work Order Number 1103J35

Checklist completed by [signature] 3/22/11
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes ✓ No __ Not Present __

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C±2)* Yes ✓ No __ KEW 3/22/11

Cooler #1 Ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by MJ

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

I:\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 28-Mar-11

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1103J55

ANALYTICAL QC SUMMARY REPORT

BatchID: 143904

Sample ID: **MB-143904** Client ID: Units: **ug/L** Prep Date: **03/23/2011** Run No: **193310**
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **143904** Analysis Date: **03/23/2011** Seq No: **4032548**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-143904** Client ID: Units: **ug/L** Prep Date: **03/23/2011** Run No: **193310**
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **143904** Analysis Date: **03/23/2011** Seq No: **4032545**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	114.1	10.0	100	3.429	111	85	115	0	0	0	

Sample ID: **1103J55-001AMS** Client ID: Units: **ug/L** Prep Date: **03/23/2011** Run No: **193310**
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **143904** Analysis Date: **03/23/2011** Seq No: **4032551**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	121.2	10.0	100	7.951	113	70	130	0	0	0	

Sample ID: **1103J55-001AMSD** Client ID: Units: **ug/L** Prep Date: **03/23/2011** Run No: **193310**
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **143904** Analysis Date: **03/23/2011** Seq No: **4032554**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	123.4	10.0	100	7.951	115	70	130	121.2	1.8	20	

Qualifiers:

	Greater than Result value		Less than Result value	B	Analyte detected in the associated method blank
BRL	Below reporting limit	E	Estimated value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Estimated value detected below Reporting Limit	N	Analyte not NELAC certified	R	RPD exceeds limits due to matrix
RL	Low Reporting Limit	S	Spike Recovery outside limits due to matrix		

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

May 02, 2011

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metals

Dear Richard McCoy:

Order No: 1104J97

Analytical Environmental Services, Inc. received 2 samples on 4/26/2011 10:15:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Kathleen Betsill
Project Manager

[illegible] • [illegible] • [illegible] • FAX [illegible]

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
AES TEL: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

CHAIN OF CUSTODY

1104397

Work Order: Habersham Metal

Date: 4-25-11 Page 1 of 1

COMPANY: Habersham Metal Products

ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531

PHONE: 706-778-2212 EXT. 118

FAX: 706-778-2769

SAMPLED BY: R. McCoy

SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total Zn

PRESERVATION (See codes): N

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	Total Zn (N)	REMARKS	No. of Containers
1	#1 Rinse tank	4-25-11	10:00a	✓		WW	✓		1
2	#2 Rinse tank	4-25-11	10:00a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1 Richard McCoy	4-25-11 / 4:00p	1 [illegible]	4/26/11 10:15
2		2	
3		3	

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT / VIA
IN / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #:
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE):
QUOTE #: PO# 12818

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- 2 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any)
E-mail? Y/N Fax? Y/N
DATA PACKAGE I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: HCl = Hydrochloric acid + ice I = Ice only N = Nitric acid N+I = Nitric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 2-May-11

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project Name:	Habersham Metals	**Collection Date:**	4/25/2011 10:00:00 AM
Lab ID:	1104J97-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	1650	100		ug/L	145580	1	04/29/2011 12:40	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- J Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc **Date:** 2-May-11

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project Name:	Habersham Metals	**Collection Date:**	4/25/2011 10:00:00 AM
Lab ID:	1104J97-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	527	10.0		ug/L	145580	1	04/29/2011 12:58	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated value above quantitation range
- S Spike Recovery out of limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham Work Order Number 1104J97

Checklist completed by [signature] 4/26/11
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes ✓ No __ Not Present __

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C+2)* MJ 4/26/11 Yes ✓ No __

Cooler #1 Ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by MJ

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

\\L\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc

Date: 2-May-11

Client: Habersham Metal Products
Project Name: Habersham Metals
Workorder: 1104J97

ANALYTICAL QC SUMMARY REPORT

BatchID: 145580

Sample ID: **MB-145580** Client ID:
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **04/28/2011** Run No: **195925**
BatchID: **145580** Analysis Date: **04/29/2011** Seq No: **4089253**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-145580** Client ID:
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **04/28/2011** Run No: **195925**
BatchID: **145580** Analysis Date: **04/29/2011** Seq No: **4089252**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	107.9	10.0	100	0	108	85	115	0	0	0	

Sample ID: **1104J97-001AMS** Client ID: **#1 RINSE TANK**
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **04/28/2011** Run No: **195925**
BatchID: **145580** Analysis Date: **04/29/2011** Seq No: **4089255**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	1692	10.0	100	1648	44	70	130	0	0	0	S

Sample ID: **1104J97-001AMSD** Client ID: **#1 RINSE TANK**
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8**
Units: **ug/L** Prep Date: **04/28/2011** Run No: **195925**
BatchID: **145580** Analysis Date: **04/29/2011** Seq No: **4089256**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	1719	10.0	100	1648	71	70	130	1692	1.58	20	

Qualifiers:
- Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Rpt Lim Reporting Limit
- Less than Result value
- E Estimated value above quantitation range
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

May 24, 2011

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metal

Dear Richard McCoy: Order No: 1105E38

Analytical Environmental Services, Inc. received 2 samples on 5/17/2011 10:20:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Kathleen Betsill
Project Manager

[illegible] • [illegible] 30340 • TEL [illegible] • FAX [illegible]

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
TEL (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX (770) 457-8188

AES

CHAIN OF CUSTODY

Work Order 1105E38 Habersham Metal

Date 5-16-11 Page 1 of 1

COMPANY: Habersham Metal Products
ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531
PHONE: 706-778-2212 Ext. 118
FAX: 706-778-2769
SAMPLED BY: R. McCoy
SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	PRESERVATION (See codes) N	REMARKS	No. # of Containers
1	#1 Rinse tank	5-16-11	10:00 a.	✓		WW	✓		1
2	#2 Rinse tank	5-16-11	10:00 a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
Richard McCoy	5-16-11/4:00 P.	1 [illegible]	5/17/11 10:20
2		2	
3		3	

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD
OUT / VIA
IN / VIA
CLIENT FedEx UPS MAIL COURIER
GREYHOUND OTHER

PROJECT INFORMATION
PROJECT NAME: Habersham Metal
PROJECT #
SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531
SEND REPORT TO: Richard McCoy
INVOICE TO (IF DIFFERENT FROM ABOVE)
QUOTE #
PO# 13088

RECEIPT
Total # of Containers: 2

Turnaround Time Request
- ✓ Standard 5 Business Days
- 2 Business Day Rush
- Next Business Day Rush
- Same Day Rush (auth req.)
- Other

STATE PROGRAM (if any)
E-mail? Y/N Fax? Y/N
DATA PACKAGE I II III IV

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water
PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice SM+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original, Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 24-May-11

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project Name:	Habersham Metal	**Collection Date:**	5/16/2011 10:00:00 AM
Lab ID:	1105E38-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	3840	10.0		ug/l	146524	1	05/20/2011 03:40	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding time for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc **Date:** 24-May-11

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project Name:	Habersham Metal	**Collection Date:**	5/16/2011 10:00:00 AM
Lab ID:	1105E38-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	2060	10.0		ug/L	146524	1	05/20/2011 03:46	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- E Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Natt See narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Huber shen Work Order Number 1105E38

Checklist completed by [signature] 5/17/11
Signature Date

Carrier name: FedEx __ UPS __ Courier ✓ Client __ US Mail __ Other _____

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes ✓ No __ Not Present __

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C ±2)* Yes ✓ No __ MJS 5/17/11

Cooler #1 Ambu Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by MJ

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters

I:\Quality Assurance\Checklists Procedures Sign-Off Templates\Checklists\Sample Receipt Checklists\Sample_Cooler_Receipt_Checklist

Analytical Environmental Services, Inc Date: 24-May-11

Client: Habersham Metal Products
Project Name: Habersham Metal
Workorder: 1105E38

ANALYTICAL QC SUMMARY REPORT

BatchID: 146524

Sample ID: **MB-146524** Client ID: Units: **ug/L** Prep Date: **05/18/2011** Run No: **197449**
SampleType: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **146524** Analysis Date: **05/20/2011** Seq No: **4123910**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-146524** Client ID: Units: **ug/L** Prep Date: **05/18/2011** Run No: **197449**
SampleType: **LCS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **146524** Analysis Date: **05/20/2011** Seq No: **4123900**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	108.9	10.0	100	0	109	85	115	0	0	0	

Sample ID: **1105C96-001AMS** Client ID: Units: **ug/L** Prep Date: **05/18/2011** Run No: **197449**
SampleType: **MS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **146524** Analysis Date: **05/20/2011** Seq No: **4123915**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	599.5	50.0	100	489.3	110	70	130	0	0	0	

Sample ID: **1105C96-001AMSD** Client ID: Units: **ug/L** Prep Date: **05/18/2011** Run No: **197449**
SampleType: **MSD** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **146524** Analysis Date: **05/20/2011** Seq No: **4123917**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	582.5	50.0	100	489.3	93.2	70	130	599.5	2.88	20	

Qualifiers:
- Greater than Result value
- BRL Below reporting Limit
- E Estimated value detected below Reporting Limit
- Rpt Lim Reporting Limit
- Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

AES

ANALYTICAL ENVIRONMENTAL SERVICES, INC.

June 23, 2011

Richard McCoy
Habersham Metal Products
264 Stapleton Rd
Conelia GA 30531

TEL: (706) 778-2212
FAX: (706) 778-2769

RE: Habersham Metals

Dear Richard McCoy:

Order No: 1106J75

Analytical Environmental Services, Inc. received 2 samples on 6/22/2011 11:50:00 AM for the analyses presented in following report.

No problems were encountered during the analyses. Additionally, all results for the associated Quality Control samples were within EPA and/or AES established limits. Any discrepancies associated with the analyses contained herein will be noted and submitted in the form of a project Case Narrative.
AES' certifications are as follows:
-NELAC/Florida Certification number E87582 for analysis of Environmental Water, soil/hazardous waste, and Drinking Water Microbiology, effective 07/01/10-06/30/11.
-AIHA Certification ID #100671 for Industrial Hygiene samples (Organics, Inorganics), Environmental Lead (Paint, Soil, Dust Wipes, Air), and Environmental Microbiology (Fungal) effective until 09/01/11.

These results relate only to the items tested. This report may only be reproduced in full.

If you have any questions regarding these test results, please feel free to call.

Kathleen Betsill
Project Manager

ANALYTICAL ENVIRONMENTAL SERVICES, INC
3785 Presidential Parkway, Atlanta GA 30340-3704
AES TEL: (770) 457-8177 / TOLL-FREE (800) 972-4889 / FAX: (770) 457-8188

CHAIN OF CUSTODY

1106075 Work Order: Habersham Metal

Date: 6-21-2011 Page 1 of 1

COMPANY: Habersham Metal Products

ADDRESS: 264 Stapleton Rd. Cornelia, Ga. 30531

PHONE: 706-778-2212 EXT. 118

FAX: 706-778-2769

SAMPLED BY: R. McCoy

SIGNATURE: Richard McCoy

ANALYSIS REQUESTED: Total ZN

Visit our website www.aesatlanta.com to check on the status of your results, place bottle orders, etc.

#	SAMPLE ID	SAMPLED DATE	SAMPLED TIME	Grab	Composite	Matrix (See codes)	PRESERVATION (See codes) N	REMARKS	No. of Containers
1	#1 Rinse tank	6-21-11	8:30a	✓		WW	✓		1
2	#2 Rinse tank	6-21-11	8:30a	✓		WW	✓		1
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									

RELINQUISHED BY	DATE/TIME	RECEIVED BY	DATE/TIME
1. Richard McCoy	6-21-11 / 4:00p	1. [illegible]	6/22/11
2.		2.	11:50
3.		3.	

PROJECT INFORMATION

PROJECT NAME: Habersham Metal

PROJECT #:

SITE ADDRESS: 264 Stapleton Rd. Cornelia, Ga 30531

SEND REPORT TO: Richard McCoy

INVOICE TO: (IF DIFFERENT FROM ABOVE)

QUOTE #: PO# 13537

RECEIPT

Total # of Containers: 2

Turnaround Time Request:
- (✓) Standard 5 Business Days
- ( ) 2 Business Day Rush
- ( ) Next Business Day Rush
- ( ) Same Day Rush (auth req.)
- ( ) Other

STATE PROGRAM (if any):

E-mail? Y/N, Fax? Y/N

DATA PACKAGE: I II III IV

SPECIAL INSTRUCTIONS/COMMENTS

SHIPMENT METHOD

OUT / / VIA:

IN / / VIA:

CLIENT FedEx (UPS) MAIL COURIER

GREYHOUND OTHER

SAMPLES RECEIVED AFTER 3PM OR SATURDAY ARE CONSIDERED AS RECEIVED ON THE NEXT BUSINESS DAY; IF NO TAT IS MARKED ON COC AES WILL PROCEED AS STANDARD TAT.
SAMPLES ARE DISPOSED OF 30 DAYS AFTER COMPLETION OF REPORT UNLESS OTHER ARRANGEMENTS ARE MADE.

MATRIX CODES: A = Air GW = Groundwater SE = Sediment SO = Soil SW = Surface Water W = Water (Blanks) DW = Drinking Water (Blanks) O = Other (specify) WW = Waste Water

PRESERVATIVE CODES: H+I = Hydrochloric acid + ice I = Ice only N = Nitric acid S+I = Sulfuric acid + ice S/M+I = Sodium Bisulfate/Methanol + ice O = Other (specify) NA = None

White Copy - Original; Yellow Copy - Client

Analytical Environmental Services, Inc **Date:** 23-Jun-11

Client:	Habersham Metal Products	**Client Sample ID:**	#1 RINSE TANK
Project Name:	Habersham Metals	**Collection Date:**	6/21/2011 8:30:00 AM
Lab ID:	1106J75-001	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8					**(E200.2)**			
Zinc	4560	10.0		ug/L	148080	1	06/23/2011 10:58	JY

Qualifiers:

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- Greater than Result value
- J Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Narr See case narrative
- NC Not confirmed
- Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc **Date:** 23-Jun-11

Client:	Habersham Metal Products	**Client Sample ID:**	#2 RINSE TANK
Project Name:	Habersham Metals	**Collection Date:**	6/21/2011 8:30:00 AM
Lab ID:	1106J75-002	**Matrix:**	Waste Water

Analyses	Result	Reporting Limit	Qual	Units	BatchID	Dilution Factor	Date Analyzed	Analyst
Trace Elements by ICP/MS E200.8				**(E200.2)**				
Zinc	1740	10.0		ug/L	148080	1	06/23/2011 11:23	JY

Qualifiers

- * Value exceeds maximum contaminant level
- BRL Below reporting limit
- H Holding times for preparation or analysis exceeded
- N Analyte not NELAC certified
- B Analyte detected in the associated method blank
- > Greater than Result value
- E Estimated value above quantitation range
- S Spike Recovery outside limits due to matrix
- Surr Surrogate Recovery
- ND Not confirmed
- < Less than Result value
- J Estimated value detected below Reporting Limit

Analytical Environmental Services, Inc.

Sample/Cooler Receipt Checklist

Client Habersham metal Work Order Number 1106J75

Checklist completed by [signature] 6-22-11
Signature Date

Carrier name: FedEx __ UPS ✓ Courier __ Client __ US Mail __ Other

Shipping container/cooler in good condition? Yes ✓ No __ Not Present __

Custody seals intact on shipping container/cooler? Yes ✓ No __ Not Present ✓ 6-22-11

Custody seals intact on sample bottles? Yes __ No __ Not Present ✓

Container/Temp Blank temperature in compliance? (4°C±2)* Yes ✓ No __

Cooler #1 Ambient Cooler #2 _____ Cooler #3 _____ Cooler #4 _____ Cooler#5 _____ Cooler #6 _____

Chain of custody present? Yes ✓ No __

Chain of custody signed when relinquished and received? Yes ✓ No __

Chain of custody agrees with sample labels? Yes ✓ No __

Samples in proper container/bottle? Yes ✓ No __

Sample containers intact? Yes ✓ No __

Sufficient sample volume for indicated test? Yes ✓ No __

All samples received within holding time? Yes ✓ No __

Was TAT marked on the COC? Yes ✓ No __

Proceed with Standard TAT as per project history? Yes __ No __ Not Applicable ✓

Water - VOA vials have zero headspace? No VOA vials submitted ✓ Yes __ No __

Water - pH acceptable upon receipt? Yes ✓ No __ Not Applicable __

Adjusted? _____ Checked by [signature]

Sample Condition: Good ✓ Other(Explain) _____

(For diffusive samples or AIHA lead) Is a known blank included? Yes __ No ✓

See Case Narrative for resolution of the Non-Conformance.

* Samples do not have to comply with the given range for certain parameters.

Analytical Environmental Services, Inc

Date: 23-Jun-11

Client: Habersham Metal Products
Project Name: Habersham Metals
Workorder: 1106J75

ANALYTICAL QC SUMMARY REPORT

BatchID: 148080

Sample ID: **MB-148080** Client ID: Units: **ug/L** Prep Date: **06/22/2011** Run No: **199741**
Sample Type: **MBLK** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **148080** Analysis Date: **06/23/2011** Seq No: **4172747**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	BRL	10.0	0	0	0	0	0	0	0	0	

Sample ID: **LCS-148080** Client ID: Units: **ug/L** Prep Date: **06/22/2011** Run No: **199741**
Sample Type: **LCS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **148080** Analysis Date: **06/23/2011** Seq No: **4172745**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	102.7	10.0	100	2.186	101	85	115	0	0	0	

Sample ID: **1106J75-001AMS** Client ID: **#1 RINSE TANK** Units: **ug/L** Prep Date: **06/22/2011** Run No: **199741**
Sample Type: **MS** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **148080** Analysis Date: **06/23/2011** Seq No: **4172750**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	4265	10.0	100	4557	-292	70	130	0	0	0	S

Sample ID: **1106J75-001AMSD** Client ID: **#1 RINSE TANK** Units: **ug/L** Prep Date: **06/22/2011** Run No: **199741**
Sample Type: **MSD** TestCode: **Trace Elements by ICP/MS E200.8** BatchID: **148080** Analysis Date: **06/23/2011** Seq No: **4172752**

Analyte	Result	RPT Limit	SPK value	SPK Ref Val	%REC	Low Limit	High Limit	RPD Ref Val	%RPD	RPD Limit	Qual
Zinc	4323	10.0	100	4557	-234	70	130	4265	1.35	20	S

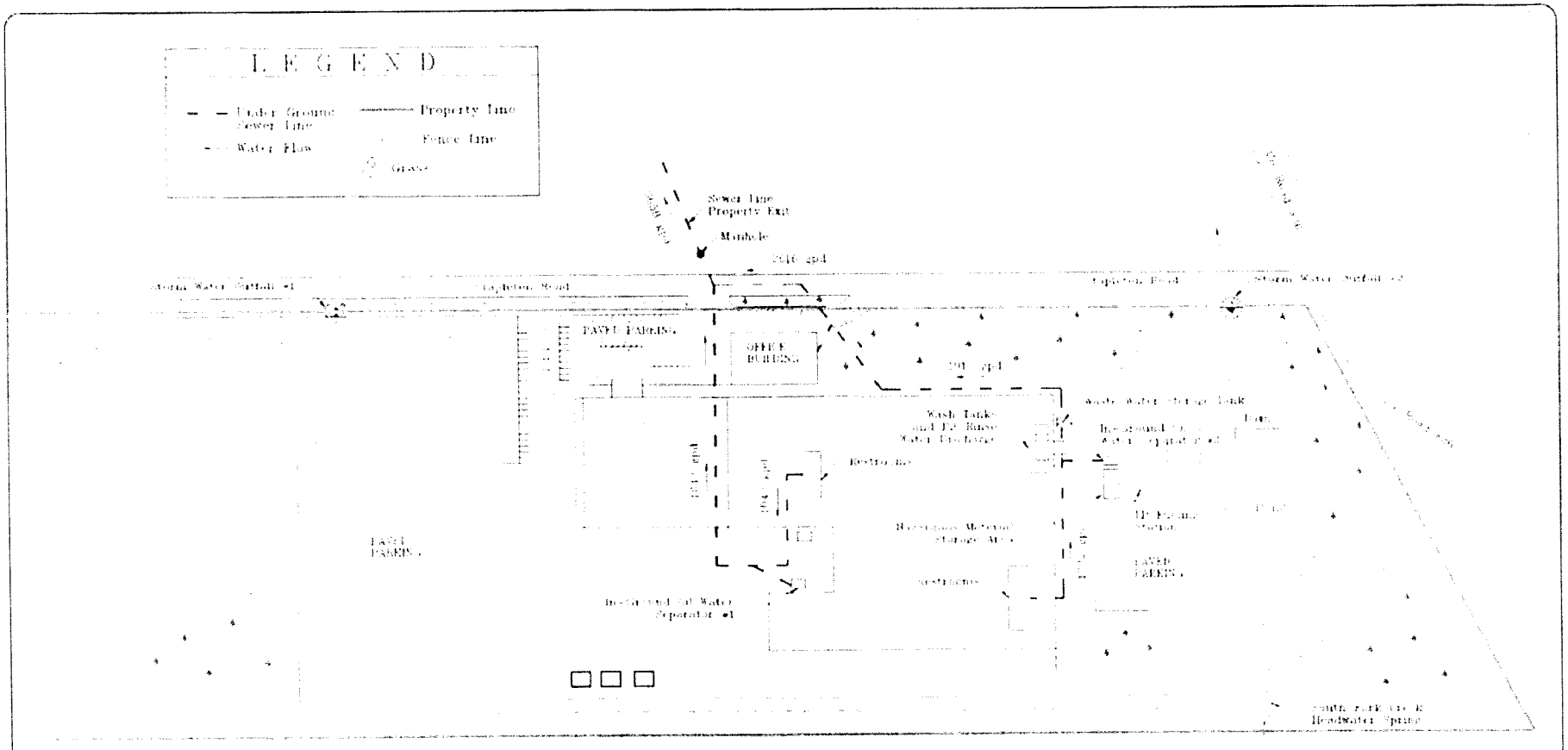
Qualifiers:

- Greater than Result value
- BRL Below reporting limit
- J Estimated value detected below Reporting Limit
- Ref Less Reporting Limit
- Less than Result value
- E Estimated (value above quantitation range)
- N Analyte not NELAC certified
- S Spike Recovery outside limits due to matrix
- B Analyte detected in the associated method blank
- H Holding times for preparation or analysis exceeded
- R RPD outside limits due to matrix

264 Stapleton Road, Cornelia, GA 30531
Phone (706) 778-2212 ▪ Fax (706) 778-2769
www.habershammetal.com.com

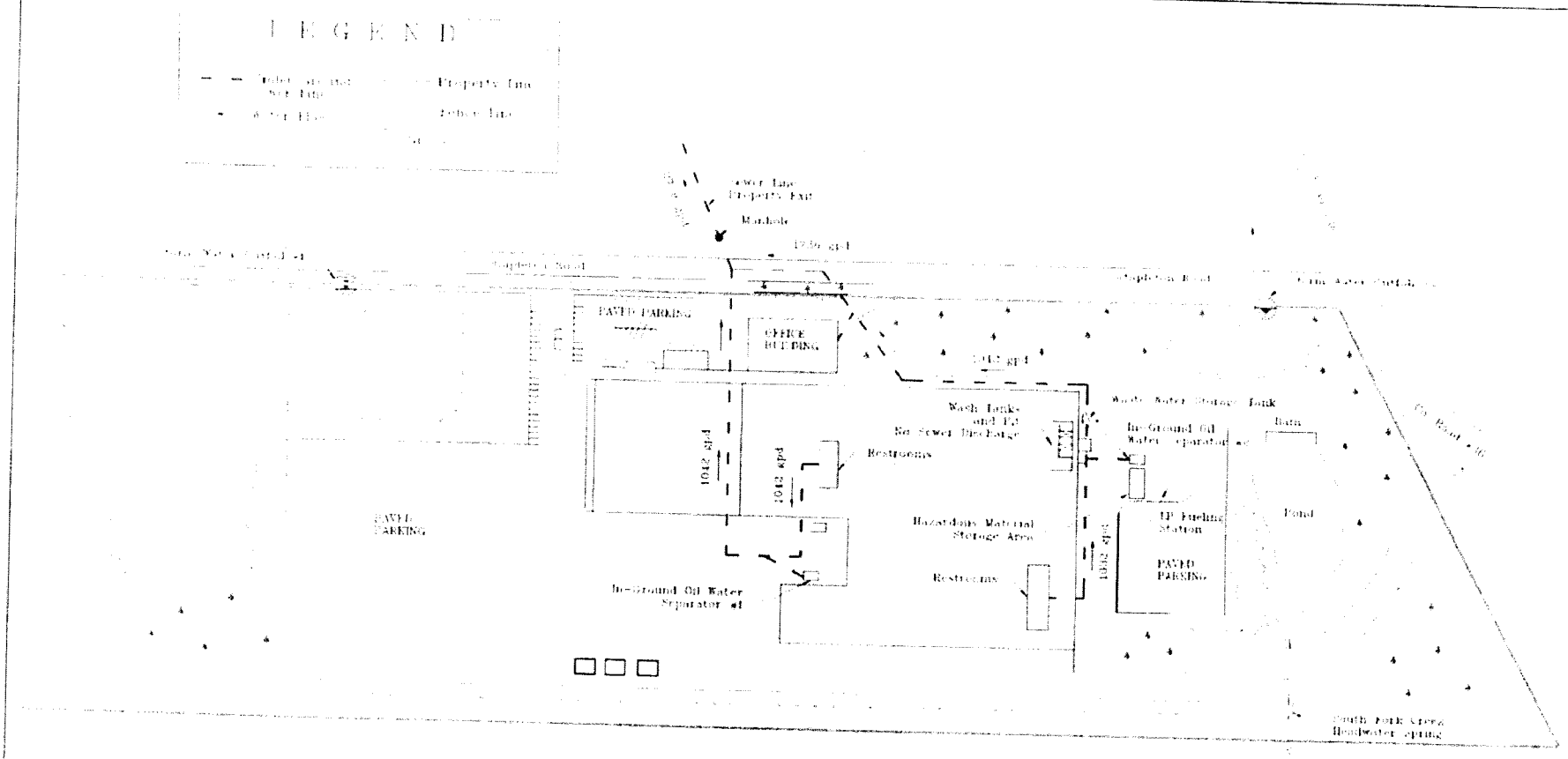
HABERSHAM
METAL PRODUCTS COMPANY,

APPENDIX D



HMPCO - Sewer Line Flow Balance Diagram Before Disconnect

Drawn by: JSIII	Checked by: JSIII	**Habersham Metal Products Co., Inc.** Engineered Steel Doors and Frames 264 Stephens Rd Cornelia, GA 30531 (706)776-2212 Fax (706)776-2763 e-mail: hmpco@habershammetal.com	Project Name: HMPCO - Sewer Line Diagram Flow Balance
Date: 1-27-17	Page: 1 of 1		Job Number:
Scale:			



HMPCO - Sewer Line Flow Balance Diagram After Disconnect

Drawn by: JSIII	Checked by: JSIII	Habersham Metal Products Co., Inc.	Project Name: HMPCO - Sewer Line Diagram Flow Balance
Date: 1-27-17	Page: 1 - 1	Engineered Steel Doors and Frames 264 Stapleton Rd Cornelia, GA 30531 (706)778-2212 FX: (706)778-2769 e-mail: hmpco@habershammetal.com	Job Number:
Scale:			

BLANK PAGE

#9

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4
Water Protection Division
NPDES Permitting and Enforcement Branch

WASTEWATER COLLECTION AND TRANSMISSION SYSTEM COMPLIANCE EVALUATION INSPECTION AND WASTEWATER TREATMENT PLANT RECONNAISSANCE INSPECTION REPORT

Water Department
City of Laurel
Jones County
Mississippi
NPDES Permit Nos. MS0024163 and MS0020176

Address:
902 West 6th Street
Laurel, Mississippi 39440

Inspection Date:
December 16, 2014

Inspectors:
Dennis Sayre, EPA Region 4
Sara Janovitz, EPA Region 4
Megan Rupp, MDEQ

Inspection Report Prepared by:
Dennis Sayre

January 20, 2015

TABLE OF CONTENTS

Contents

I. OVERVIEW 1
II. OBJECTIVES 1
III. INVESTIGATION METHODS 2
IV. REGULATORY SUMMARY 2
V. INSPECTION SUMMARY AND FINDINGS 3
A. Management Interview 3
B. SSO Observations 3
C. Site Inspection 11
D. Management, Maintenance and Operations (MOM) Programs 15
E. Wastewater Treatment Plant Reconnaissance Inspection 19
VI. CONCLUSIONS 21

ABBREVIATIONS AND ACRONYMS

CEI	Compliance Evaluation Inspection
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	United States Environmental Protection Agency
GIS	Geographic Information System
GPM	Gallons per Minute
I/I	Infiltration/Inflow
ICIS	Integrated Compliance Information System
LS	Lift Station
MDEQ	Mississippi Department of Environmental Quality
NPDES	National Pollutant Discharge Elimination System
MGD	Million Gallons per Day
MOM	Management, Operation, and Maintenance
RDII	Rain Derived Infiltration and Inflow
SORP	Sewer Overflow Response Plan
SSO	Sanitary Sewer Overflow
WCTS	Wastewater Collection and Transmission System
WWTP	Wastewater Treatment Plant

I. OVERVIEW

The City of Laurel (the City) owns two Wastewater Treatment Plants (WWTPs) and the associated Wastewater Collection and Transmission Systems (WCTSs) which consist of approximately 136 miles of sanitary sewer gravity pipes, 47 pump stations and associated appurtenances. United Water, Incorporated is contracted to maintain and operate the City's WWTPs and their associated WTCSs. The City serves approximately 19,760 residential customers and various business and industrial entities within the city limits.

The U.S. Environmental Protection Agency sent an Information Request Letter pursuant to Section 308 of the Clean Water Act (CWA) (308 Letter) to the City requesting information related to Sanitary Sewer Overflows (SSO) from the City's sewer system. The EPA received the City's response, prepared by United Water, dated September 26, 2014, to EPA's 308 Letter on September 30, 2014.

The EPA and the Mississippi Department of Environmental Quality (MDEQ) conducted a Compliance Evaluation Inspection (CEI) of the City's WCTS on December 16, 2014. The purpose of this CEI was to evaluate compliance with the CWA and the National Pollutant Discharge Elimination System (NPDES) permits as it relates to SSOs from the sewer system and to assess the City's Management, Operations and Maintenance (MOM) type programs.

The EPA discussed MOM programs United Water management, including inspection and maintenance records, sewer assessments, preventive maintenance and more. The EPA and MDEQ also interviewed management personnel and visited various sites in the WCTS including: the manholes located on North 5th Avenue, North 2nd Avenue and Herbert Avenue; Lift Station (LS) 22, located at Wayne Farms, LLC poultry processing plant; LS 34 ("Howard Ballast LS"), located at 580 Eastview Drive; the LS located at the 3600 block of Industrial Boulevard. The EPA also performed a reconnaissance inspection of the City's two WWTPs to assess the general condition of the facilities. This report describes the EPA's findings, and provides an initial analysis of SSOs from the sewer system. In this report, the EPA also identifies areas that need to be addressed and presents some preliminary recommendations.

Any property relating to the operation and maintenance of the Publically Owned Treatment Works (POTW), whether real or intellectual property, is assumed to be the property of the City for the purposes of this report. "United Water" will be referenced as appropriate.

II. OBJECTIVES

The specific objectives of the inspection were to assess the City's compliance with the CWA, evaluate reported SSOs, assess the MOM programs, where implemented, and to examine the causes of SSOs in the City's sewer system.

III. INVESTIGATION METHODS

The investigation included:

- Review the City's S308 Letter response;
- Review of the Integrated Compliance Information System - National Pollutant Discharge Elimination System (ICIS-NPDES) federal database, state documents and the NPDES Permit;
- Interviews with the United Water and City personnel; and,
- Visual inspection.

IV. REGULATORY SUMMARY

The MDEQ is authorized under the CWA to implement the NPDES program in Mississippi. The George Gaddy Treatment Facility #1 (permitted under the name Laurel POTW, No. 1), located at 1300 Creek Road Avenue, is authorized under MDEQ's NPDES Permit No. MS0024163 to discharge treated sewage into Tallahala Creek. The George Gaddy Treatment Facility #2 (permitted under the name Laurel POTW, No. 2), located at 341 Flora Avenue, is authorized under the NPDES Permit No. MS0020176 to discharge treated sewage into Tallahala Creek. POTW No. 1 and POTW No. 2 are both major dischargers with permitted capacities of 7.4 million gallons per day (MGD) and 6.6 MGD respectively.

The Tallahala Creek is a major tributary of the Leaf River in the Pascagoula River Basin. Tallahala Creek was listed as impaired for Organic Enrichment/Low Dissolved Oxygen in 1996 and again in 1998. MDEQ developed a Total Maximum Daily Load (TMDL), effective September 22, 1999, for POTW No. 1 and No. 2 (as well as one additional privately owned treatment works) to address the impairment. No other impairment was noted for this waterbody in or immediately downstream of Laurel.

SSOs are prohibited discharges based on Sections 301 and 402 of the CWA which generally prohibit the discharge of pollutants by any person unless authorized by an NPDES permit. Condition No. T-28 (Proper Operation, Maintenance and Replacement) of POTW No. 1 and No. 2 NPDES Permits requires the City to properly operate and maintain all components of the system to achieve compliance with the conditions of the permit. Condition No.T-29 (Duty to Mitigate) also requires the City to "take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit that has a reasonable likelihood of adversely affecting human health or the environment."

Discharges to waters of the United States from sanitary sewer systems are prohibited unless authorized by an NPDES permit. In addition, overflows from the sewer system that do not reach waters of the United States can be indicative of a failure to comply with the proper operation and maintenance provisions of City's permits.

V. INSPECTION SUMMARY AND FINDINGS

The EPA performed a pre-inspection evaluation and an on-site inspection of the WCTS. The pre-inspection evaluation of the City's WCTS consisted of examining historic records submitted by United Water, on behalf of the City. This section will provide a summary of both means of inspection.

A. Management Interview

The EPA and MDEQ met with the United Water personnel and City representatives which included the Director of Public Works and Mayor Johnny Magee, at 8:00 a.m., December 16, 2014, at the United Water's office in Laurel. Topics of discussion during the meeting included the use and documentation of any MOM programs, including Mapping, Sewer Overflow Response Plan (SORP), Preventive Maintenance Programs, Operations Programs, Continuous Sewer System Assessment Program (CSSAP), Capacity Assurance Program, and Fats, Oil, and Grease (FOG) Control.

The EPA discussed concerns relating to SSOs in detail with United Water's Area Manager, Mr. Randall Dias, and inquired about each program listed above to determine whether a formal or non-formal (not in writing) program existed to manage various maintenance and operations needs of the WCTS. MOM programs are discussed in more detail in Section V.E (Management, Operation and Maintenance Programs) below. Section V.B (SSO Observations) provides detailed discussions relating to SSOs.

B. SSO Observations

As requested pursuant to the 308 Letter, the City submitted to the EPA information related to SSOs that occurred from September 2009 through August 2014. The EPA analyzed the information and compiled results based on total number of overflows, total and average volume of overflows per year per 100 miles of pipe and the average volume per SSO. The EPA also categorized the SSOs by cause which included causation categories as listed in Table 1 below. Grease and roots blockage categories are frequently related causes in that grease accumulation around roots often cause blockages. It appears that grease and root blockages caused only 14% of the SSOs that occur in the City whereas 46% of the SSOs are caused by Rain Derived Infiltration and Inflow (RDII). SSOs caused by mechanical or electrical failures at a pump station amounted to 18% of the reported SSOs and 8% were associated directly with failed force mains (refer to Table 1 and Figure 1 below). Of the 84 SSOs reported to the EPA, 35 were reported to have discharged into waters of the U.S.

Cause Summary	No. of SSOs
Blockage	14
Contractor Damage	6
FM Failure	7
Pipe Failure	6
Lift Station Failure	18
RDII	33
Total	84

Table 1. SSO Cause Count.

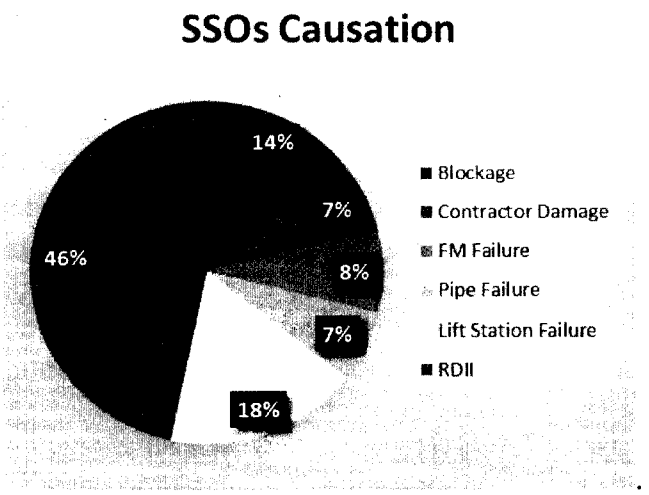


Figure 1. SSO Causation Chart.

All SSOs reported to the EPA were plotted on a map as shown in Figure 2 below. The EPA discussed four specific SSO locations circled in Figure 2. SSOs reported at N 5th Avenue, N 2nd Avenue, and Herbert Avenue, appeared to be chronic SSO locations due to lack of system capacity from excessive flow caused by RDII during wet weather events. One area of concern on Industrial Boulevard experienced an excessive number of force main pipe failures. These locations were discussed in detail with United Water management. Table 2 summarizes RDII related SSOs reported by the City.

RDII SSO locations	SSO Count
N 5th Ave	12
Herbert Ave	9
N 2nd Ave	3
Johnson Circle	5
E 5th Street	1
Flynt Rd	1
Maple Street	1

Table 2. RDII caused SSO locations.

United Water personnel and contractors investigated the cause of SSOs on N 2nd and N 5th Avenues in early 2014 and discovered that large volumes of stormwater was being discharged into the sanitary sewer system from illicit discharge points located on the property of the Wayne Farms chicken processing plant, causing SSOs upstream of the Wayne Farms LS. United Water stated that the illicit discharges of stormwater have since been disconnected from the WCTS and further stated that the City plans to increase the lift station capacity for the Wayne Farms LS, which is supported by a Community Development Block Grant. The SSOs reported at the Wayne Farms plant are listed in Table 2, as E 5th Street. Disconnecting the illicit stormwater discharges appears to have positively affected the flow capacity of the WCTS at N 2nd/N 5th Avenue, E 5th Street and at Herbert Avenue.

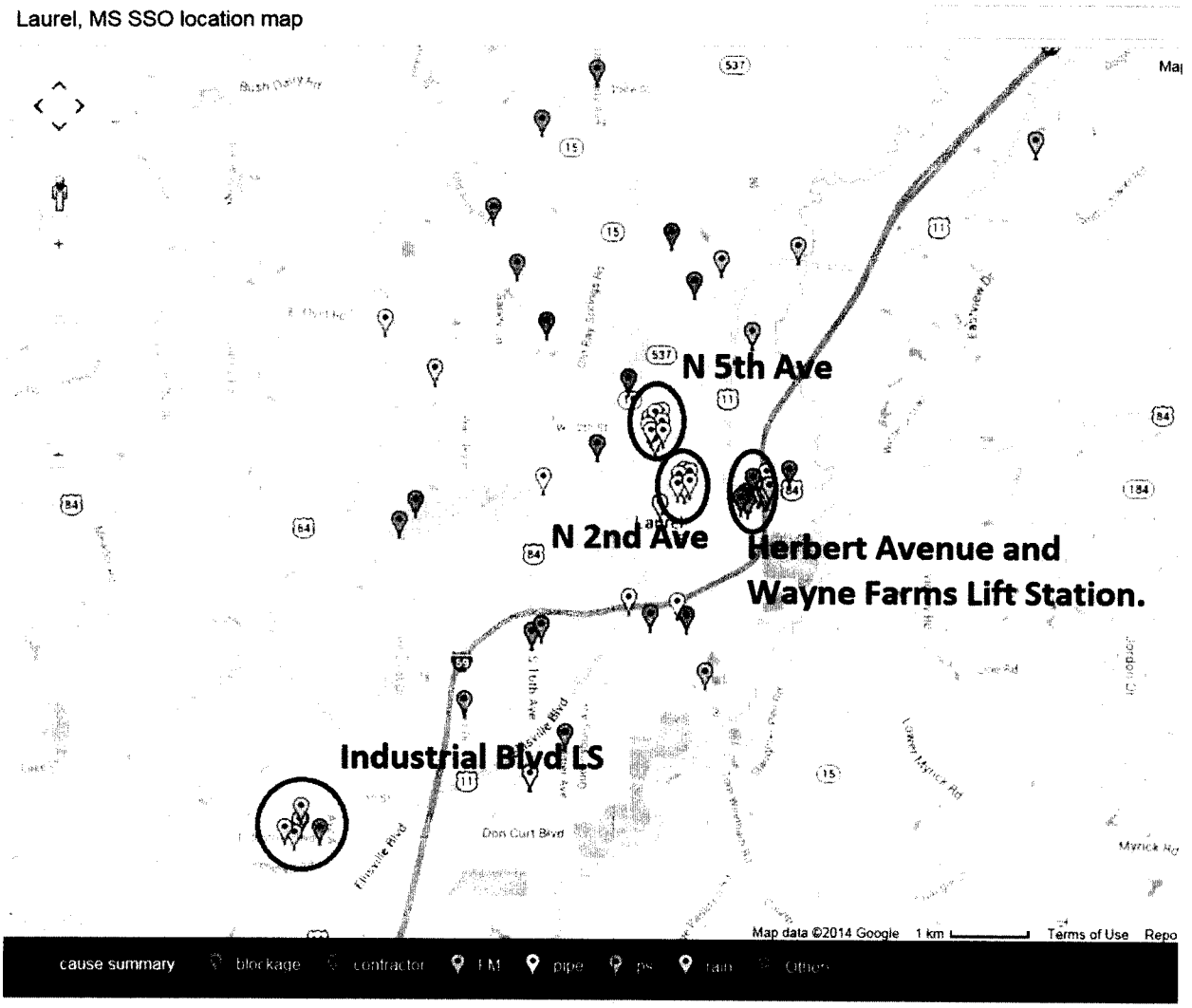


Figure 2. SSO map for SSOs occurring between September 2009 and August 2014. (The pin locations are an approximation of SSO locations).

The gravity pipes and manholes on Herbert Avenue are located in close proximity to the WWTP, as is the Wayne Farms LS. The Wayne Farms LS gravity pipe transmits industrial waste to the Anaerobic Pond at POTW No. 2 (Smyly WWTP). The gravity pipes on Herbert Avenue and the N 2nd/N 5th Avenue SSO locations are connected at E 5th Street and transmitted directly to the WWTP receiving pond by gravity (according to the sewer pipe drawings provided), which in turn is presumably pumped to the head works and receiving secondary treatment at the oxidation ditch. It is unclear how the Wayne Farm and E 5th St gravity pipe segments are connected at the manhole marked in Figure 3, but United Water stated that the Wayne Farms collection system is connected at this manhole to prevent sewage overflows from the lift station wet well to protect the food processing operation. These SSO locations are discussed further in the Site Inspection section below.

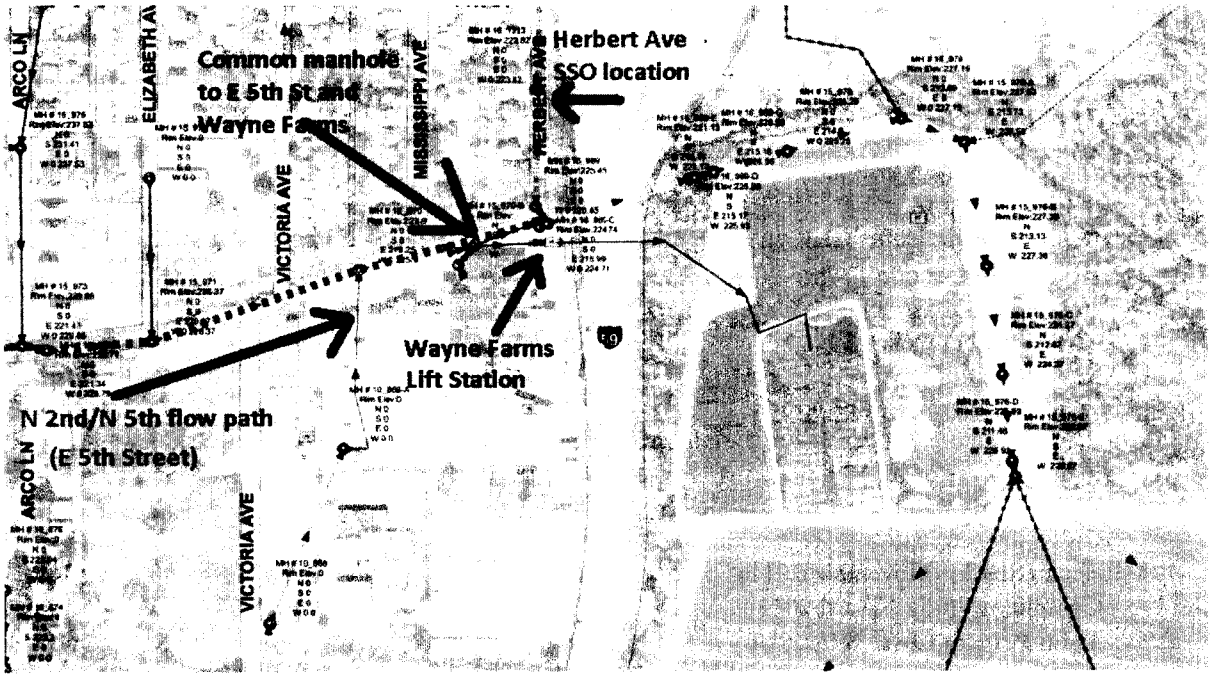


Figure 3. Sewer map at Wayne Farms LS and Herbert Avenue.

SSOs reported on Johnson Circle were not specifically discussed during this interview. These SSOs occurred between December 2009 and March 2011. The City's 308 Letter response indicated that these SSOs were addressed through sewer rehabilitation. No SSOs were noted since March 2011 at the Johnson Circle location.

United Water management reiterated that the City has invested major funds into rehabilitation and system upgrades since 2009. Additional rehabilitation plans are underway for the City's WCTS. The 308 Letter response also included a summary of rehabilitation activity and funding plans, as shown below.

Capital Sewer Projects - Laurel, MS

2009 SRF Sewer Improvements – Contract 1
-Replaced 12,788 LF of sewer main and 55 manholes
-Rehabilitated 5,451 LF of sewer main and 267 VLF of manholes
Began Design – April 2009
Began Construction – September 2010
Completed Construction – December 2011
Total Project Cost: $2,625,652

2009 SRF Sewer Improvements – Contract 2
-Replaced 903 LF of sewer main
-Rehabilitated 14,128 LF of sewer main and 500 VLF of manholes
Began Design – April 2009
Began Construction – September 2010
Completed Construction – June 2011
Total Project Cost: $1,424,340

Brown Street Sewer Improvements
-Installed 2,300 LF of new sewer main to allow for an additional capacity overflow from an existing main to prevent SSOs.
Began Design – November 2010
Began Construction – April 2011
Completed Construction – December 2011
Total Project Cost: $428,869

Inflow and Infiltration Study
-Conducted comprehensive I&I study to assess sewer collection system and identify projects to reduce major sources of I&I.
-Included 8 rain gauges, 33 flow meters, 226,000 LF of smoke testing, and 76,153 LF of cleaning and CCTV Inspection.
Began Study – November 2011
Completed Study – April 2013
Total Project Cost: $432,620

Generator Upgrades
-Installed 2 new generators at both WWTP facilities to allow complete continuous operation of WWTP in the event of power failure.
Began Design – November 2011
Began Construction –March 2013
Completed Construction – November 2013
Total Project Cost: $630,836

WWTP Headworks Upgrades
-Installed new bar screens, new influent pumps and upgraded controls at both WWTP facilities to help eliminate system surcharges and better handle high flow events.
Began Design – April 2012
Began Construction – June 2013
Expected Completion Date – October 2014

Total Project Cost: $2,862,649

2013 SRF Sewer Improvements
-Project is funded, designed, and awarded to the low bidder. Construction NTP has been issued as of September 8, 2014.
-Plan quantities include 21,050 LF main rehabilitation, 15,200 LF main replacement, 750 VLF manhole rehabilitation, and 63 manholes replaced
Began Design – June 2013
Expected Construction Start Date –October 2014
Expected Completion Date – October 2015
Total Project Cost: $5,529,200

2013 Pump Station Improvements
This Project covered 15 Pump Stations and included:
Control Panel Upgrades/replacement
Pump repairs/replacement
Installation of SCADA for remote monitoring
Wet well repairs
Total Project Costs: $493,000.00

2013 Equipment Purchases for Maintenance of the SSS
Vacon/Jet Truck for Cleaning of the SSS and Pump Station Wet Wells
TV/Camera Truck for assessing the SSS and recommending: repair, replacement, etc..
Backhoe for making repairs
Dump Truck
Smoke testing equipment: Fans, blowers, smoke sticks
Total Equipment Costs: $764,741.00

2014 Pump Station Improvements
This Project covered 15 Pump Stations and included:
Control Panel Upgrades/replacement
Pump repairs/replacement
Installation of SCADA for remote monitoring
Wet well repairs
Total Project Costs: $500,000.00

2016 SRF Sewer Improvements
-Facilities plan submitted and approved by MDEQ.
-Preliminary quantities include 21,600 LF main replacement, 7,730 LF main rehabilitation, 74 manholes replaced, and 230 VLF of manhole rehabilitation.
Expected Design Start Date– Spring 2016
Expected Construction Start Date – Summer 2017
Expected Completion Date – Summer 2018
Total Project Cost: $3,175,930

Findings:

Data submitted to the EPA indicates that the City is experiencing SSOs at a rate of 12.4 SSOs per 100 miles of pipe per year for the period evaluated. Refer to Table 3 for the annual breakdown and analysis of SSOs.

Date	SSOs
09/2009 - 08/2010	9
09/2010 - 08/2011	7
09/2011 - 08/2012	11
09/2012 - 08/2013	24
09/2013 - 08/2014	33
total	84
annual average	16.8
SSO/100 MOP/year	12.4

Table 3. SSO analysis.

As indicated above, the majority of the reported SSOs is due to a lack of capacity to transmit excessive flow caused by RDII. The EPA examined rain events during the period from August 2009 to September 2014 to approximate the size of rain storm that would cause enough RDII in the system to hydraulically overload the gravity pipes, resulting is SSOs. Table 4 below references the rain data summary for those days that the City reported SSOs. National Oceanic and Atmospheric Administration (NOAA) rain data can be found in Enclosure 1.

Data collected from NOAA is raw data from USGS weather station 224939 located on Tallahala Creek at Hwy 15 (east-central part of the City) and from a Private Weather Station number KMSLAURE2, located in the Pine Belt area in the northern part of the City. Rain data was collected from two rain stations to increase accuracy of observed rain events throughout the City. The data collected from NOAA indicating 0" inches in Table 4, when rain likely occurred on that date, may be due to unavailable data for that specific day. RDII derived SSOs in sanitary sewer systems typically behave such that a rain event on any given day will likely cause an SSO to occur at the same location given the same or similar rain event, all things being equal. An examination of Table 4 indicates that the probability of an SSO occurring on Herbert Avenue is high for any rain event equal to or greater than 0.79 inches and could have occurred with rain events of smaller duration and intensity, as indicated in Table 4. Since some rehabilitation work was performed in sewersheds serving these SSO locations since early 2014 for North 5th Avenue, North 2nd Avenue, and Herbert Avenue and since 2011 for Johnson Circle, the same analogy may not hold true after completion of work; however, an analysis of the NOAA data indicates a high probability that SSOs occurred in much higher numbers than what was reported by the City.

Date (epa)	location summary (EPA)	Volume (EPA entry)	Cause Summary (EPA)	NOAA Rain Gauge Data(USGS station at Tallahala Crk) (daily-inches)	NOAA Rain Gauge Data (daily-inches)	Public Weather Station KMSLAURE2 (Pine Belt area north part of Laurel)
2/1/11	Flynt Rd	3,500	rain	0"	2.02" on 2/2	1.83"
2/11/13	Herbert Ave	2,400	rain	3.3"	2.6" on 2/12, 0.17" on 2/13	0"
3/11/13	Herbert Ave	400	rain	0.79"	.82" on 3/12	0.43"
4/11/13	Herbert Ave	900	rain	0.07"	1.63" on 4/12	0.38"
9/24/13	Herbert Ave	400	rain	0"	0" on 9/23, 2.63" on 9/22	1.08"
3/16/14	Herbert Ave	10	rain	2.02"	0" on 3/15	1.26"
4/4/14	Herbert Ave	525	rain	0"	1.95" on 4/5/14, 1.45 " on 4/6/14, 1.15" on 4/7	0.51"
4/14/14	Herbert Ave	500	rain	0"	3.32" on 4/15	1.96"
4/14/14	Herbert Ave	300	rain	0"	3.32" on 4/15	1.96"
4/28/14	Herbert Ave	700	rain	0"	4.02" on 4/29	2.54"
12/14/09	Johnson Circle	350,000	rain	0.03"	2.6" on 12/13, 0.34 on 12/12	1.8"
12/30/09	Johnson Circle	60,000	rain	0"	0.86" on 12/31	0.99"
2/4/10	Johnson Circle	25,000	rain	0.4"	3.1" on 2/5	4.24"
2/1/11	Johnson Circle	5,500	rain	0"	2.02" on 2/2	1.83"
3/9/11	Johnson Circle	25,540	rain	3.5"	0.15" on 3/8	1.71" (1.3" on 3/8)
7/19/12	Maple Street		rain	0.27	2.0" on 7/19	0"
4/4/14	N 2nd	525	rain	0"	1.95" on 4/5/14, 1.45 " on 4/6/14, 1.15" on 4/7	0.51"
4/14/14	N 2nd	500	rain	0"	3.32" on 4/15	1.96"
4/28/14	N 2nd	700	rain	0"	4.02" on 4/29	2.54"
12/8/13	N 5th Ave	500	rain	0.04"	0.73" on 12/7, 2.83" on 12/9	0.2"
3/28/14	N 5th Ave	1,750	rain	2.01"	0.8" on 3/29	2.34"
4/4/14	N 5th Ave	625	rain	0"	1.95" on 4/5, 1.45 " on 4/6, 1.15" on 4/7	0.51"
4/4/14	N 5th Ave	525	rain	0"	1.95" on 4/5, 1.45 " on 4/6, 1.15" on 4/7	0.51"
4/4/14	N 5th Ave	525	rain	0"	1.95" on 4/5, 1.45 " on 4/6, 1.15" on 4/7	0.51"
4/14/14	N 5th Ave	525	rain	0"	3.32" on 4/15	1.96"
4/14/14	N 5th Ave	500	rain	0"	3.32" on 4/15	1.96"
4/14/14	N 5th Ave	500	rain	0"	3.32" on 4/15	1.96"
4/14/14	N 5th Ave	500	rain	0"	3.32" on 4/15	1.96"
4/28/14	N 5th Ave	700	rain	0"	4.02" on 4/29	2.54"
4/28/14	N 5th Ave	700	rain	0"	4.02" on 4/29	2.54"
4/28/14	N 5th Ave	700	rain	0"	4.02" on 4/29	2.54"
4/14/14	Wayne Dr	300	rain	0"	3.32" on 4/15	1.96"

Table 4. Rain Data for RDII caused SSOs between December 2009 and April 2014. Data indicating 0" of rain may be due to a lack of available data and does not necessarily indicate that zero rain occurred.

A comparison of the data in Table 4 and the NOAA data indicates that SSOs likely occurred in at least one of these four locations: North 5th Avenue, North 2nd Avenue, Herbert Avenue and Johnson Circle. Table 5 shows the "Total Rain Days" for rain events as indicated in the "24 hour rain event >=" column. This table shows rain events that totaled 0.79 inches (or greater) of rain in a 24 hour period occurred for 131 days over a 5 year period. Comparing Table 4 and Table 5 concludes that at least one RDII derived SSO would have likely occurred on North 5th/2nd Avenue, Johnson Circle and/or Herbert Avenue over a total period of 131 days between October 2009 and September 2014. The City reported a total of 32 RDII derived SSOs that occurred over a period of 16 days between October 2009 and September 2014 indicating that the City has grossly under reported SSO events in the past.

24 hour rain event >=	0.79"	1.5"	2.54"
10/2009 - 9/2010	22	9	3
10/2010 - 9/2011	22	8	2
10/2011 - 9/2012	26	14	5
10/2012 - 9/2013	37	13	5
10/2013 - 9/2014	24	10	3
Totals Rain Days	131	54	18

Table 5. Rain days greater than or equal to 0.79", 1.5", and 2.54" of rain in a 24 hour period.

The EPA also examined SSO reports that were submitted to MDEQ by the City from August 2009 to December 2014. The reports to MDEQ appeared to match the SSOs reported by the City to the EPA and the SSO observed during inspection at the Howard Ballast LS was documented on MDEQs records. However, the SSO that occurred on Herbert Avenue, as noted in the site inspection below, was not recorded in MDEQs records. Enclosure 2 is a copy of MDEQ's SSO records from August 2014 to December 2014.

C. Site Inspection

The following are observations noted during the visual on-site inspection.

North 5th Avenue: The EPA and MDEQ visited several manholes on North 5th Avenue, many of which were bolted down. One manhole was opened and inspected (Figure 4 below). There was no clear evidence that any recent SSOs have occurred at these locations. Of note, the City was performing sewer rehabilitation on the gravity pipes about one city block away (Figure 5).

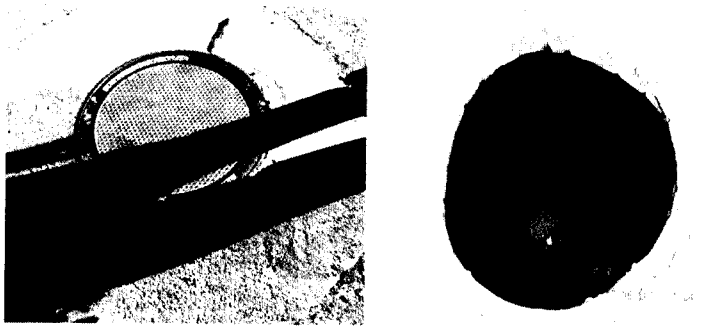


Figure 4. Manholes located approximately 30 yards apart on N. 5th Avenue.

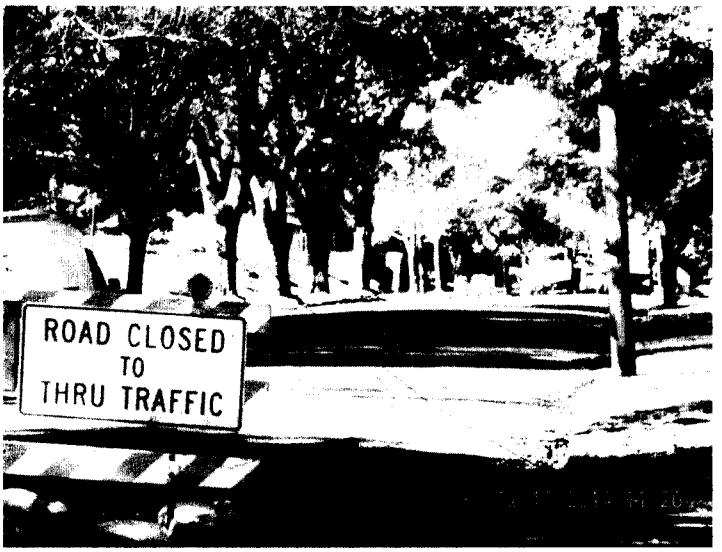


Figure 5. Sewer rehabilitation work in progress during inspection.

North 2nd Avenue: The EPA and MDEQ visited manholes on the corner of N 2nd Avenue and 7th Street. The manhole ladder rungs were coated with sewage debris up to the manhole crown indicating that this location has surcharged regularly in the past (Figure 6). However, there was no clear evidence that this site experienced any recent SSOs.

Figure 6. North 2nd Avenue manhole invert.

Herbert Avenue: The EPA and MDEQ visited two manholes, located in close proximity, on Herbert Avenue. Figure 7 shows fresh sewage debris on the interior and exterior crown of the manhole, indicating that an SSO had occurred as recently as the night before the inspection.

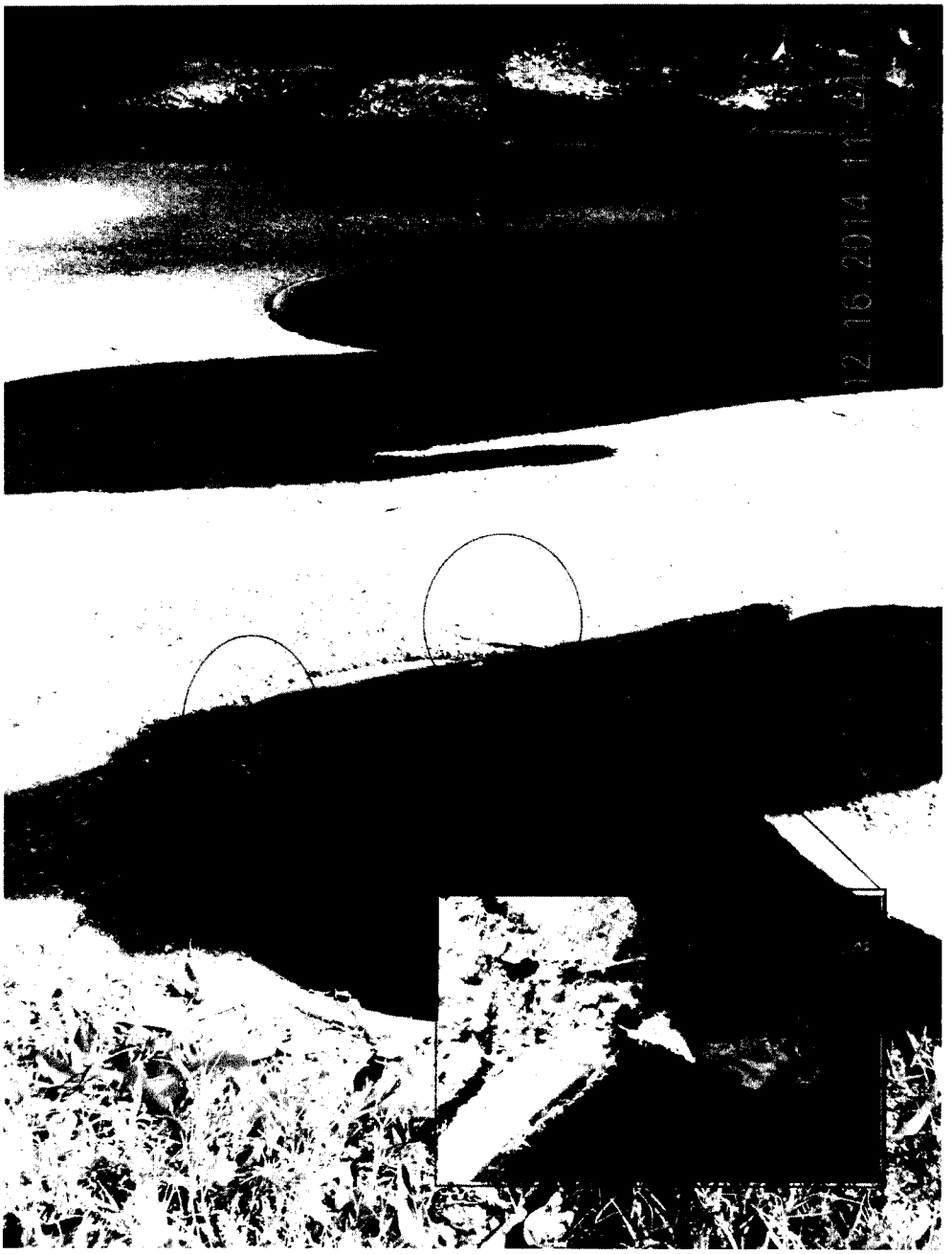


Figure 7. Herbert Avenue manholes. Red circles annotates sewage debris that was observed at the interior and exterior crown of the manhole.

Figure 8. Herbert Avenue manhole invert.

The manholes on Herbert Avenue appeared to have deteriorated pipe capacity in at least one of the manholes and has an accumulation of sewage debris on all ladder rungs (Figure 8). Both of these manholes are about 5 feet in depth. The evidence collected at this site indicates that surcharging and SSOs continue to be a common occurrence from these shallow manholes. Figure 9 shows that SSOs reported to hit water by the City from this location directly impacts waters of the U.S.

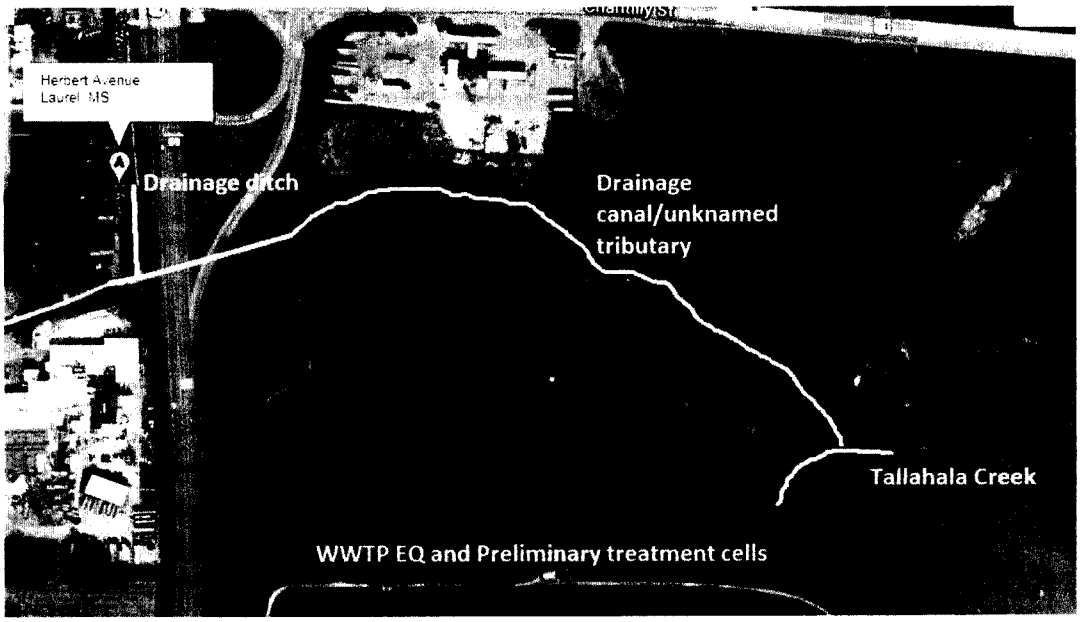


Figure 9. Blue line shows path of SSO discharge to Tallahala Creek.

Wayne Farms Lift Station: The Wayne Farms LS is located on the Wayne Farms, Inc. poultry processing facility. This lift station is scheduled for a wet well and pump upgrade to facilitate an increase in capacity. No evidence of SSOs were noted at this location. The facility handles a large amount of solids and biological oxygen demand constituents. The lift station appears to be operating properly.

Howard Ballast Lift Station: The Howard Ballast LS is located on the property of Howard Lighting Products, a division of Howard Industries, Inc. This lift station transmits industrial and domestic waste from this facility. United Water personnel disclosed that an SSO was occurring at this location at the time of inspection. An investigation after the incident showed that the pump impeller was clogged with rags which facilitated the incident. United Water personnel were on-site responding to the SSO well before the EPA's arrival. The facility was also instructed to cease its waste flow while the LS was off-line to correct the problem. United Water's response to the SSO appeared to be adequate to minimize the environmental impact and to correct the malfunction. Figure 10 shows the wet well and the exterior valve box for this lift station.

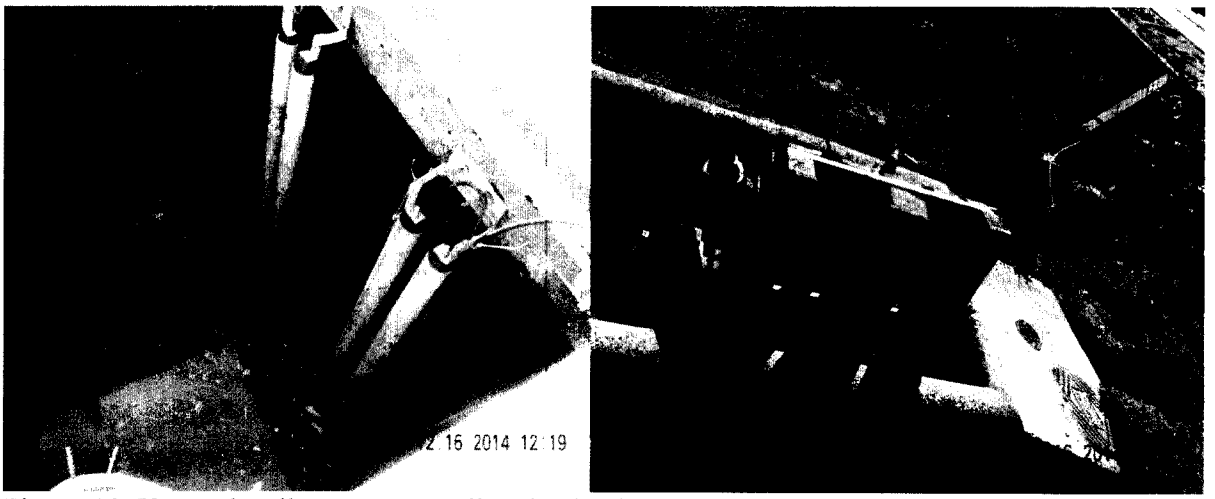


Figure 10. Howard Ballast LS wet well and valve box.

Industrial Boulevard Lift Station: This lift station was in good working order and appears to be operating properly. SSOs attributed to PVC force main failure was reported by the City from this location. Rehabilitation work has been performed on the lift station and the associated force main.

D. Management, Maintenance and Operations (MOM) Programs

As part of the initial inspection interview, the EPA made inquiries into what programs and procedures the City is utilizing to properly manage, operate and maintain the WCTS. This section will describe the EPA's findings as it relates to MOM type programs as well as a brief description of the types of programs that are typical of a well-run utility. MOM Program development guidance documents can be found on EPA, Region 4's website at http://www.epa.gov/region4/water/wpeb/momproject/.

1. Information Management System

The information management system enables utility management to adequately evaluate operation, maintenance, customer service (complaint response), and system rehabilitation activities so that overall system performance can be determined and utility planning can be conducted.

The City is currently utilizing management software ("eRportal") that was partially implemented at the time of the inspection. eRPortal is an automated asset management tool that includes work order and customer complaint tracking and, according to the product website, "applications that enable companies to optimize operations, maintain assets and infrastructure, and manage all related materials, resources, and logistics." The EPA did not assess the functionality of this software tool, but United Water expects that full implementation will occur during the first quarter of 2015.

2. Mapping Program

Formal Mapping Program documentation should be developed to ensure consistency of map protocol and to provide official guidance for map review and maintenance.

The City has its WCTS mapped in a GIS-based map that displays sewer pipe and manhole locations. The City also uses advanced software that allows United Water personnel to utilize hand held devices to view the sewer map.

3. Grease Control Program

The EPA recommends that the City develop documents that outline procedures and provide guidance on how to manage and reduce FOG build-up in the WCTS. A valid FOG program includes providing guidance documents for permitting, inspection, enforcement, compliance tracking, budgeting, establishing inspection priorities, public education guidance and performance goals and provide specific grease control obligations for food service establishments in accordance with City ordinances. Formal FOG program development should include a review of the City's ordinances to ensure that the appropriate personnel have the ability to adequately enforce FOG related ordinances.

The City enforces sewer ordinances through the City's Inspections Department. United Water states that the Inspections Department works closely with the Water Department and has been proactive in enforcing grease trap violations. A sufficient FOG Program document for the Water Department could outline the relationship between the departments, contact information, procedures used by United Water personnel to request the Inspections Department to investigate possible ordinance violations due to excessive grease build-up in gravity pipe segments and wet wells, and reporting and follow-up procedures.

4. Capacity Assurance Program

A formal Capacity Assurance Program includes specific criteria for approval of additions to the WCTS and/or WWTPs, balancing Permit requirements and the City's codes and ordinances; performance measures used to approve or deny an extension of the collection system; and procedures used to calculate capacity in the collection system and at the treatment plant.

5. Preventive Maintenance and Inspection Programs

A **Gravity Line Preventive Maintenance Program**. The Gravity Line Preventive Maintenance Program should include the following components: 1) blockage abatement mechanisms (including both hydraulic and mechanical cleaning); 2) root control mechanisms; 3) debris control mechanisms, and 4) manhole preventive maintenance procedures. This program should include the following activities: 1) identification of, and provision for, all personnel and equipment needed; 2) determination of the frequency; 3) establishment of procedures; 4) establishment of priorities for scheduling; 5) the use of standard forms; 6) establishment of record keeping requirements; 7) establishment of performance measures; and 8) integration of all data collected under the program with other information management systems.

The City currently cleans and inspects gravity lines on an as-needed basis.

A **Continuing Sewer System Assessment Program (CSSAP)**. The CSSAP should establish procedures for setting priorities and schedules for undertaking the WCTS assessment including: 1) corrosion defect identification; 2) routine manhole inspections; 3) flow monitoring; 4) CCTV activities; 5) gravity system defect analysis; 6) smoke testing, and; 7) pump station performance and adequacy analysis. The CSSAP should provide for the assessment of at least ten percent (10%) of the WCTS on average per year, resulting in the assessment of the entire WCTS at least once every ten years, and establish priorities and schedules taking into consideration the nature and extent of customer complaints; flow monitoring; location and cause of SSOs and WCTS deficiencies; any remediation work already ongoing; pump station run times; field crew work orders; any preliminary sewer assessments, such as flow monitoring results; community input; and any other relevant information.

A **Infrastructure Rehabilitation Program (IRP)**. The IRP should establish procedures for setting priorities and schedules for undertaking rehabilitation of the WCTS. The IRP should address Infiltration/Inflow (I/I), structural issues in the WCTS, and the other conditions causing SSOs, with the goal of eliminating future SSOs. The IRP should take into account all previous information the City has gathered including any information gathered pursuant to the CSSAP. The IRP should also establish standard procedures to analyze the effectiveness of completed rehabilitation projects.

The EPA noted during inspection that an I/I study was conducted in 2012 and that the City is focusing rehabilitation efforts to reduce I/I in an effort to mitigate RDII derived SSOs. The EPA also received various planning maps and descriptions indicating that the City is taking proactive steps to address RDII related SSOs.

A **Pump Station Operations and Preventive Maintenance Program**. The Pump Station Operation and Preventive Maintenance Program should include or address the following items/components described below:

i. Pump station operations at pump stations that are to be conducted on a routine, scheduled basis. The program should define the standard pump station operating procedures to be followed at each pump station such as reading and recording information from the elapsed time meters, recording information from the pump start counters, observing wet well conditions and grease accumulation, checking and re-setting, as necessary to improve system performance, wet well set points, checking and recording system pressure, checking SCADA components, checking alarms and stand-by power and identifying maintenance needs.

ii. Emergency pump station operations procedures. The program should address pump station operations at pump stations that are to be conducted as a result of equipment failure or loss of electrical power. The program should define the emergency pump station operating procedures to be followed at each pump station such as calling for emergency maintenance, initiating stand-by power by bringing in portable generators or initiating portable pump operations for pump around.

iii. The program should establish schedules, routes, priorities, standard forms and reporting procedures and establish minimum acceptable performance measures and condition grading criteria.

Preventive maintenance and inspection programs can have a significant positive impact on the future condition of the WCTS. A properly implemented preventive maintenance, inspection and rehabilitation programs can prevent a massive outlay of expenses needed to repair or replace parts of the system that maintenance and management personnel 'did not see' failing due to the lack of prevention. Relatively small preventive maintenance expenses now can save the City larger repair expenses in the future. Formal guidance can also be used to educate City officials, such as the Mayor and City Council responsible for funding decisions and the allocation of resources essential to proper operation and maintenance of the utility.

United Water appears to be applying adequate preventive maintenance on critical systems such as pump stations, air relief valves, force mains, etc. The City would benefit with formally written programs for the various reasons discussed above.

6. Sewer Overflow Response Plan

United Water has developed and implemented an *Incident Reporting SOP for Wastewater Spills and SSO Incidents*. This document includes procedures to respond to SSOs and procedures to report SSOs and bypasses to MDEQ. The document includes 24 hour verbal reporting procedures to MDEQ, as well as to "United Water Incident Reporting Hotline" and provides for incident tracking using commercial software (referred to as the Intelex reporting system). Reporting forms and examples are included for both verbal and written reports to MDEQ. The addition of volume estimating procedures would greatly improve this document.

Equipment available for responding to SSOs includes two VAC trucks, one CCTV truck and a portable camera. None of the lift stations utilize emergency back-up power, nor does the City maintain adequate portable back-up generators for running the lift stations during a major power outage; however, each lift station is equipped with bypass pump connectors and the City retains a local contractor to provide pumps and associated portable power as needed with strict time receipt requirements to respond to emergencies.

E. Wastewater Treatment Plant Reconnaissance Inspection

The EPA and MDEQ performed a Reconnaissance Inspection to ascertain the general condition of the City's wastewater treatment plants. The following summarizes EPA's findings.

1. Laurel POTW No. 1: This WWTP is an oxidation ditch activated sludge type of treatment plant. This plant is permitted under the name "Laurel POTW Number 1," however, the building signage at the facility labels the plant "George Gaddy Wastewater Treatment Facility #1," and the plant is locally referred to as the Massey WWTP.

   The Massey WWTP also has a large receiving pond, similar to a facultative lagoon, that receives sanitary sewage and excess wet weather flow, a decant pond for sludge dewatering and an "anaerobic pond" that handles industrial waste as a preliminary treatment process before transmitting to the oxidation ditch. The plant grounds appeared to be satisfactorily maintained. The influent pump station, oxidation ditches and UV disinfection systems were generally in good condition. Severe damage was noted on the weir of one of the clarifiers. The v-notch weirs appeared to be dysfunctional and at the end of service life (Figure 11).

Figure 11. Clarifier v-notch weir shows excessive algae or moss build-up and extreme wear or damage.

An excessive amount of algae or moss was noted growing on the weirs and in other sections of the clarifier. The EPA observed the effluent from the outfall to the receiving waters and noted that the effluent appeared to be clean and clear.

2. Laurel POTW No. 2: This WWTP is an oxidation ditch activated sludge type of treatment plant. This plant is permitted under the name "Laurel POTW Number 2," however, the sign at the facilities office labels the facility the "George Gaddy Wastewater Treatment Facility #2," and the plant is locally referred to as the Smyly WWTP.

   This plant also has a large receiving pond, similar to a facultative lagoon, that receives sanitary sewage and excess wet weather flow, a decant pond for sludge dewatering and an "anaerobic pond" that handles industrial waste from Wayne Farms chicken processing plant as a preliminary treatment process before transmitting to the oxidation ditch. The plant grounds appeared to be satisfactorily maintained. The influent pump station, oxidation ditches and UV disinfection system was generally in good condition. The v-notch weirs appeared to be functional but had excessive algae/moss build-up and showed signs of corrosion.

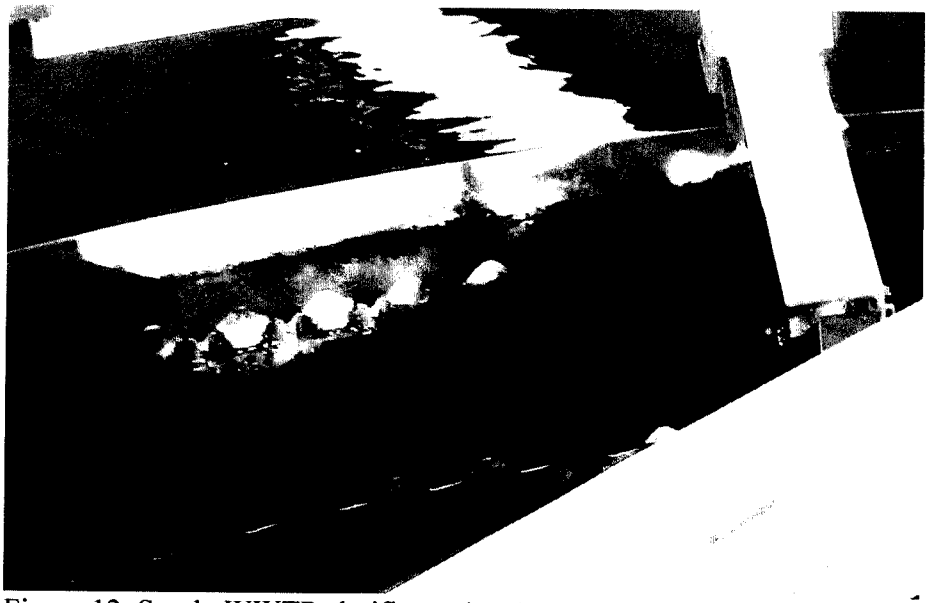


Figure 12. Smyly WWTP clarifier weirs. (Note the difference in weir shape from Figure 11).

The EPA observed the effluent from the outfall to the receiving waters and noted that the effluent appeared to be slightly turbid (light brown) at the contact chambers but no notable color difference at the receiving water.

VI. CONCLUSIONS

The EPA noted that the City is taking the steps to mitigate SSOs and provide needed rehabilitation for the WCTS. However; SSOs located at Herbert Avenue are of considerable concern. United Water management informed the EPA that SSOs at North 5th and North 2nd Avenues may have been eliminated though rehabilitation performed in the sewersheds serving these locations. The City should provide firm evidence that these SSOs have been eliminated and are no longer chronic SSO locations or that the rehabilitation projects currently planned will adequately eliminate these SSOs.

The EPA also noted that some preventive maintenance procedures are being utilized by United Water that are in keeping with best management practices to operate and maintain the system; however, the discrepancies noted at the WWTPs are indicative of a lack of formal preventive maintenance guidance. With the exception of the *Incident Reporting SOP for Wastewater Spills and SSO Incidents,* the City and United Water do not have any formal documents to formalize programs utilized to properly manage, operate and maintain the WCTS. The EPA recommends that United Water and the City develop formal written document for MOM programs as outlined for the WCTS and the WWTPs.

The EPA is very concerned, as noted in Section V.B (SSO Observations), that SSOs are not being reported adequately. The City and United Water should formalize an SSO inspection route for, at minimum, those locations in the WCTS that have experienced more than one SSO at the same location over a period of 12 months, and all known historical RDII-related SSO locations. This inspection route should include SSO locations to be inspected, time and date inspected, and the signature of the person doing the inspection.

Lastly, the v-notch weirs at the Massey WWTP need to be replaced and the clarifiers at both WWTPs should be cleaned regularly to prevent excessive growth of algae/moss. Corrosion noted in the clarifiers should also be examined more closely and adequate steps should be taken to implement corrosion mitigation.

BLANK PAGE

#1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

APR 30 2015

CERTIFIED MAIL 7014 2870 0000 3318 0219
RETURN RECEIPT REQUESTED

Mr. Lester Sola
Director, Miami-Dade Water & Sewer Department
Miami-Dade County
3071 Southwest 38th Avenue
Miami, Florida 33146

Re: Compliance Evaluation Inspection of the Central District Wastewater Treatment Plant
Notice of Violation
National Pollutant Discharge Elimination System Permit No.: FL0024805

Dear Mr. Sola:

The U.S. Environmental Protection Agency Region 4 conducted a Compliance Evaluation Inspection (CEI) of Miami-Dade County's Central District Wastewater Treatment Plant on February 12, 2015. This CEI was conducted because the EPA issued the National Pollutant Discharge Elimination System (NPDES) Permit for the discharge from this facility and therefore, the EPA is required to conduct an annual inspection pursuant to 40 C.F.R. § 123.26.(e)(5). Enclosed are the CEI report and photographs taken during the CEI.

The EPA's inspection noted several NPDES Permit violations. Specifically, Miami-Dade County violated Part II, Section B.1. of the above-referenced NPDES Permit related to proper operation and maintenance as outlined in the enclosed CEI report. The EPA expects that the requirements of the new Consent Decree, once they are developed and implemented, will prevent similar foreseeable violations in the future.

If you have specific questions regarding either this Notice of Violation or the CEI, please contact Mr. Brad Ammons, of my staff, at (404) 562-9769 or via email at ammons.brad@epa.gov.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosures

cc: Mr. Michael Hambor
Florida Department of Environmental Protection
West Palm Beach

Mr. Francois Saint-Phard
Miami-Dade County Water and Sewer Department

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4
Water Protection Division
NPDES Permitting & Enforcement Branch

COMPLIANCE EVALUATION INSPECTION REPORT

Miami-Dade County, Florida
Water and Sewer Department
Central District (Virginia Key) Wastewater Treatment Plant
Miami, Florida
NPDES Permit No. FL0024805

Facility Address:
3989 Rickenbacker Causeway (Virginia Key)
Miami, Florida 33149

Inspection Date:
February 12, 2015

Inspectors:
Brad Ammons, Environmental Engineer, EPA Region 4
David Phillips, Environmental Engineer, EPA Region 4
Michael Bechtold, Florida DEP, West Palm Beach
Lisa Self, Florida DEP, West Palm Beach

Inspection Report Prepared by:
Brad Ammons

March 17, 2015

Table of Contents

ABBREVIATIONS AND ACRONYMS ii
OPENING CONFERENCE 1
CENTRAL DISTRICT WWTP PLANT 1 OBSERVATIONS/VIOLATIONS/DEFICIENCIES 2
SLUDGE DEWATERING BUILDING OBSERVATIONS/DEFICIENCIES 4
INJECTION WELL DRILLING AREA OBSERVATIONS 4
RECORDS REVIEW OBSERVATIONS 5
CENTRAL DISTRICT WWTP PLANT 2 OBSERVATIONS/VIOLATIONS/DEFICIENCIES 5
EFFLUENT PUMP STATION 7
EXIT CONFERENCE 8

ABBREVIATIONS AND ACRONYMS

$CBOD_5$	Carbonaceous Biochemical Oxygen Demand, 5-day
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	United States Environmental Protection Agency
MGD	Million Gallons per Day
MLSS	Mixed Liquor Suspended Solids
NPDES	National Pollutant Discharge Elimination System
PS	Pump Station
RAS	Return Activated Sludge
TSS	Total Suspended Solids
WASD	Miami-Dade County Water and Sewer Department
WCTS	Wastewater Collection and Transmission System
WWTP	Wastewater Treatment Plant

COMPLIANCE EVALUATION INSPECTION REPORT
Compliance Evaluation Inspection of the Miami-Dade County Central District WWTP, February 12, 2015

Miami-Dade County, FL
Central District WWTP (CDWWTP)
EPA Region 4
Compliance Evaluation Inspection
Thursday, February 12, 2015

Time of Entry: 9:15 AM.

OPENING CONFERENCE

The following people were in attendance during the opening conference before the Miami-Dade County (Miami-Dade) Central District WWTP walk-through:

EPA Region 4	Miami-Dade County WASD
Brad Ammons	Francois Saint-Phard (WWTP Supervisor)
David Phillips	

The EPA representatives and Francois Saint-Phard (WWTP Supervisor) began the opening conference by discussing what process units and equipment were out of service. Mr. Saint-Phard stated that the following units were out of service during this inspection:

Plant 1:
(1) Sludge digesters in Cluster #1.

Plant 2:
(1) North grit chamber;
(2) Oxygenation Train #2 (offline for mixer upgrades; also needs electrical upgrade);
(3) Final settling tank #10 (offline for overhaul);
(4) Sludge digesters in Cluster #1;

Mr. Saint-Phard also noted that the northern gas sphere was taken offline when they found a pinhole leak at the bottom of the sphere. In addition, he mentioned that the oxygen plant #3 is offline for repairs and that the motor for effluent pump #4 is out for maintenance. Finally, Mr. Saint-Phard noted that all of the oxygenation tanks in Plant 2 were recently cleaned.

Mr. Saint-Phard then noted that Plant 2 was hit with something that caused an upset in late December (2014) to early January (2015) from Miami Beach. Miami Beach's raw sewage is pumped through the 54" force main into Plant 2 of the CDWWTP. According to Mr. Saint-Phard, it occurred overnight and the night shift staff did not tell him until early the following morning. Night shift staff stated that they smelled a diesel-like odor in the MLSS channel of Plant 2, but when Mr. Saint-Phard toured that area the following morning, he did not smell any strange odors. Staff had to haul MLSS to re-seed Plant 2 (from Plant 1) for 3 days before the upset began to wane. When asked if it could be from the North District WWTP (NDWWTP) sludge (which is pumped to the CDWWTP for treatment), Mr. Saint-Phard stated that it was unlikely because the NDWWTP's sludge is still pumped to the 9th Street pump station, which

ultimately comes into CDWWTP Plant 1, not Plant 2. Specifically, the primary sludge from the NDWWTP is pumped directly into the sludge concentrators at the CDWWTP; the secondary sludge from NDWWTP is pumped to the 9th Street PS and thus, is discharged into the CDWWTP Plant 1 headworks.

Mr. Saint-Phard then noted that he doesn't believe that the County will meet the deadline for the CDWWTP headworks outlined in Appendix A of the new Consent Decree. County staff and consultants are considering perforated screens for the new headworks at the CDWWTP.

FDEP staff (Michael Bechtold and Lisa Self) joined the EPA and Mr. Saint-Phard for the walk-through portion of this CEI after the opening conference. FDEP staff only attended the walk-through of Plant 1.

CENTRAL DISTRICT WWTP PLANT 1 OBSERVATIONS/VIOLATIONS/DEFICIENCIES

Time of Entry: 10:00 AM

Flows enter Plant 1 of the CDWWTP from the mainland/downtown Miami via the 4th Street Pump Station and the 9th Street Pump Station through either the 72" or the 102" joint force mains. Both of Plant 1's influent aerated grit chambers were in service during the inspection. Flow at the northern grit chamber of Plant 1 was metered at 31.4 MGD (10:01 am), but Mr. Saint-Phard noted that the influent flow meters are not used for reporting purposes due to the inaccuracies when the flumes are submerged. Thus, the County adds up the flows from the incoming pump stations (i.e. 4th Street PS; 9th Street PS; Miami Beach PS; Key Biscayne PS; and a few others) to calculate the influent flows to the CDWWTP. The EPA subsequently noted that Mr. Saint-Phard told the EPA that the County had recently completed adjusting weirs that prevents submersion of the grit chamber flumes during last year's CEI. *See enclosed photo.*

While inspecting the influent automatic sampler in Plant 1's headworks, Mr. Saint-Phard told the EPA and FDEP that both influent automatic samplers (for Plant 1 and Plant 2) are time composite (i.e. the sampler pulls a 200 mL sample every hour), whereas the effluent automatic sampler is flow composite. According to County staff, parts arrived the day before this CEI to convert both of the influent automatic samplers to flow composite. *See enclosed photo.*

> **Deficiency/Recommendation:** While the EPA-issued NPDES permit only requires a 24-hour composite sample, it is a concern that Miami-Dade has time-composite samplers to monitor influent while it has flow-composite sampler for monitoring effluent. This is inconsistent compositing and could impact monitoring results (e.g. for % removal calculation). The EPA encourages Miami-Dade to install whatever equipment to make all compositing consistent and suggests that Miami-Dade conduct flow-composite samples for all influent and effluent.

Hauled waste is no longer being accepted at this WWTP. Miami-Dade has requested all waste haulers to take their loads to the County's South District WWTP.

The concrete in the influent grit chamber building was still in bad shape, as it was during the September 2011, April 2012, April 2013 and May 2014 EPA inspections.

> **Deficiency/Recommendation:** Structural/concrete issues were noted in several areas of Plant 1. Structural/concrete issues pose safety hazards for WWTP staff. Miami-Dade should address all of the structural/infrastructure issues within Plant 1 pursuant to the deadlines in the new Consent Decree.

All of the oxygenation tanks in Plant 1 were operational during this inspection. All of the final settling tanks in Plant 1 were operational during this inspection. The EPA noted that the County had installed new aluminum grates over the final settling tank troughs for safety purposes as the previous fiberglass grates were showing signs of aging.

The EPA observed less scum as well as less algae on the weirs in the Plant 1 final settling tanks than during previous inspections. While scum, algae, debris and trash appeared to be less than in previous inspections, the amount of pin floc being discharged out the ocean outfall was greater than seen in the past and is a concern. *See enclosed photo.*

> **Violation/Recommendation:** Part II, Section B.1. of the EPA-issued NPDES permit requires the permittee to "...at all times 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." Miami-Dade violated this provision due to the large amount of pin floc being discharged to the Atlantic Ocean.
>
> Miami-Dade should explain why the final settling tanks are experiencing such large amounts of pin floc that is being discharged (e.g. sludge age and/or blanket depths; not enough sludge wasting due to out of service sludge digesters, etc.). All of the trash, floatables, algae and floc are likely to be discharged through the outfall into the Atlantic Ocean.

Mr. Saint-Phard told the EPA that all of the ultrasonic sludge blanket depth monitors in both Plants have been installed and are operational.

The EPA noted several locations in the walkways between the final settling tanks that had structural cracks in the concrete all the way through the walkway and/or support columns to the walkway in Plant 1 (e.g. walkway along final settling tank #4B). *See enclosed photo.*

> **Deficiency/Recommendation:** The structural cracks in the walkways may present a safety hazard to workers and compliance inspectors should the walkways fail while in use. Miami-Dade should thoroughly inspect and address walkways with structural risks and implement all structural repairs pursuant to the deadlines in the new Consent Decree.

Plant 1's primary anaerobic sludge digester #1 experienced a roof collapse on September 5, 2011 and was still out of service during this inspection (as was the entire sludge digester cluster #1 of

Plant 1). The EPA did not enter the sludge digester control buildings, but Mr. Saint-Phard stated that the structural building issues were the same as observed during EPA's previous inspections.

> **Violation/Recommendation:** Part II, Section B.1. of the EPA-issued NPDES permit require the permittee to "...at all times 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." The increasing sludge digester rehabilitation needs, including but not limited to, digester covers, as well as control equipment/pumps and buildings, will likely put further stress on Plant 1 and could potentially cause solids backup into the effluent if not addressed soon. Miami-Dade should address the Plant 1 sludge digesters pursuant to the deadlines in the new Consent Decree.

SLUDGE DEWATERING BUILDING OBSERVATIONS/DEFICIENCIES

Ferric Chloride is fed into a valve box outside the Sludge Dewatering Building (prior to adding polymer) to decrease struvite creation. The two ferric chloride tankers in temporary containment that were observed outside of the sludge dewatering building during last year's CEI had been removed and a permanent ferric chloride tank (with secondary containment and controls) has been installed. *See enclosed photos.*

The EPA and FDEP did not enter the sludge dewatering building, but is assumed that the sludge truck loading ceiling structural issues were the same as noted during the EPA's April 2013 CEI.

> **Deficiency/Recommendation:** As noted for the sludge digester control buildings, the influent grit buildings and the final settling tanks for both Plants at the CDWWTP, structural and concrete issues pose safety hazards for WWTP staff and could potentially impact treatment efficiency and/or effluent quality. Miami-Dade should implement all structural rehabilitation pursuant to the deadlines outlined in the new Consent Decree.

At this point, Mr. Saint-Phard noted that he is still waiting on sludge hauling dump trucks to be delivered. Mr. Saint-Phard noted that he's been told that they've already been paid for, but the County is waiting upon delivery of the trucks. Mr. Saint-Phard also noted that all Plant 1 sludge concentrators and 2 of Plant 2's sludge concentrators have been recently overhauled.

INJECTION WELL DRILLING AREA OBSERVATIONS

Behind the sludge dewatering building, an area has been fenced off for drilling of an exploratory well that will potentially be used for injection of treated wastewater for the County to comply with the State's Ocean Outfall Legislation. At the time of this CEI, the well had been drilled to just over 1,000 feet deep. Ed Rectenwald (County drilling consultant) told the EPA that the well will eventually be over 10,000 feet deep and will have a 5,000 psi blowout preventer. Mr. Rectenwald told the EPA and FDEP that they expect that the well's injection zone will still be an estimated 2,000 feet above any oil or gas. When asked what they plan to do with the groundwater during well construction, it was noted that the ultimate plan is to hold the water, test

it for chlorides and if the chlorides are not too high, will send the water to the headworks of the CDWWTP for treatment and ultimate discharge out the ocean outfall. *See enclosed photo.*

RECORDS REVIEW OBSERVATIONS

The EPA reviewed daily sampling records (e.g. laboratory bench sheets, chain of custody forms, etc.) for the months of June 2014, December 2014 and January 2015 and the resulting Discharge Monitoring Reports (DMRs). The EPA noted the following deficiencies in the records that were reviewed:

- On June 22 and 25, 2014, the Plant 1 effluent had high values of Total Suspended Solids (TSS). On 6/22/2014, the Plant 1 effluent TSS was 54.5 mg/L (combined total effluent TSS that day was 42.5 mg/L). On 6/25/2014, the Plant 1 effluent TSS was 103 mg/L and the combined total effluent TSS was 112 mg/L.
- Looking at operational monitoring data, it appears that the upset mentioned above started on December 31, 2014. Below are the TSS % removal daily values for Plant 2 from the records reviewed:
  - December 30, 2014: 95%
  - December 31, 2014: 88%
  - January 1, 2015: 68%
  - January 2, 2015: 81%
  - January 3, 2015: 62%
  - January 4, 2015: 78%
  - January 5, 2015: 84%
  - January 6, 2015: 80%
  - January 7, 2015: 87%
  - January 8, 2015: 88%
  - January 9, 2015: 78%
  - January 10, 2015: 86%
  - January 11, 2015: 83%
  - January 12, 2015: 88%
  - January 13, 2015: 92%

Plant 2's TSS % removal returned to normal values (i.e. 90+% removal, as shown on December 30, 2014, prior to the upset) by January 13, 2015. The EPA noted that the January 27, 2015 sludge sample appeared to be normal, but is concerned about potential longer-term effects in the sludge after this upset event and its impact for approximately 2 weeks on Plant 2's TSS % removal efficiency.

CENTRAL DISTRICT WWTP PLANT 2 OBSERVATIONS/VIOLATIONS/DEFICIENCIES

Time of Entry: 4:55 pm

Flows enter Plant 2 of the CDWWTP from either Miami Beach (via 54" force main under Government Cut) or from Key Biscayne (via 24" force main). As noted in previous inspections, the influent from Miami Beach does not receive any screening.

The influent automatic sampler readout indicated the refrigerator was 3.9° Centigrade and the interior manual thermometer was 4.0° Centigrade. As noted above, both of the influent automatic samplers (Plant 1 and Plant 2) are time composite (i.e. the sampler pulls a 200 mL sample every hour), whereas the effluent automatic sampler is flow composite. According to County staff, parts arrived the day before this CEI to convert both of the influent automatic samplers to flow composite.

> **Deficiency/Recommendation:** While the EPA-issued NPDES permit only requires a 24-hour composite sample (i.e. it doesn't require flow or time based compositing), it is a concern that Miami-Dade has time-composite samplers to monitor influent while it has flow-composite sampler for monitoring effluent. This is inconsistent compositing and could impact monitoring results (e.g. for % removal calculation). The EPA encourages Miami-Dade to install whatever equipment to make all compositing consistent and suggests that Miami-Dade conduct flow-composite samples for all influent and effluent.

The EPA noted that the southern grit chamber was out of service during this CEI while Mr. Saint-Phard had told the EPA that the northern grit chamber of Plant 2 was out of service at the opening conference. At the headworks, Mr. Saint-Phard told the EPA that the northern grit chamber had just been placed back into service the week prior to this CEI and that may explain the discrepancy. The influent flowrate for Plant 2 was observed to be 71.29 MGD (north grit flume). As noted during last year's CEI, the Miami Beach flow meter is locked and is under the control of the City of Miami Beach. The City has placed a sticker on the meter stating that the paper recorder is a percentage of flow, not the actual flow (similar to the effluent flow meter of this WWTP).

While at the grit chambers for Plant 2, the EPA inquired about the rehabilitation of the generators for the WWTP that are south of the grit chambers. Mr. Saint-Phard stated that the generators were upgraded to external radiators about 9 years ago, but that the radiators were never connected to the engines. Miami-Dade has completed the rehabilitation of the generators.

Three of the four oxygenation tanks were in service during this inspection. Oxygenation tank #2 was out of service for upgrades of the mixers and Mr. Saint-Phard noted that it needs an electrical upgrade as well.

While the EPA did not observe any items that would be screened out of the wastewater by bar screens (e.g. cloths, rags, etc.) that had been noted in previous inspections in the influent trough to the Plant 2 final settling tanks, the EPA still recommends that Miami-Dade consider requiring the City of Miami Beach to install bar screens at its pump station similar to the bar screens on Miami-Dade's 4th Street pump station and/or installing bar screens at the headworks of Plant 2.

Final settling tank #10 was out of service for an overhaul (cleaning, fixing skimmer chains, coating concrete and/or weirs with paint or epoxy, etc.).

In the final settling tanks/secondary clarifiers of Plant 2, the EPA observed some algae and large floatables, trash/debris (e.g., plastic trash), unsettled floc and large amounts of pin floc. *See the enclosed photos*.

Violation/Recommendation: Part II, Section B.1. of the EPA-issued NPDES permit requires the permittee to "...at all times 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." Previous EPA inspections have noted similar trash, floatables, algae and pin floc in the final settling tanks/secondary clarifiers.

Miami-Dade should explain why the final settling tanks are experiencing such large amounts of pin floc that is being discharged (e.g. sludge age and/or blanket depths; not enough sludge wasting due to out of service sludge digesters, etc.) through the outfall into the Atlantic Ocean.

The EPA did observe that new sludge blanket meters have been installed for all 10 of the Plant 2 final settling tanks. Mr. Saint-Phard told the EPA that all of the sludge blanket meters had been installed in both Plants. *See enclosed photo.*

The EPA noted several locations in the walkways between the final settling tanks that had structural cracks in the concrete all the way through the walkway and/or support columns to the walkway.

Deficiency/Recommendation: The structural cracks in the walkways may present a safety hazard to workers and compliance inspectors should the walkways fail while in use. Miami-Dade should thoroughly inspect and address walkways with structural risks and implement all structural repairs pursuant to the deadlines in the new Consent Decree.

The EPA did not inspect the sludge digester control buildings, but Mr. Saint-Phard stated that they were in the same condition as they were during the EPA's April 2013 inspection.

Violation/Recommendation: Part II, Section B.1. of the EPA-issued NPDES permit requires the permittee to "...at all times 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." The increasing sludge digester rehabilitation needs, including but not limited to, digester covers, as well as control equipment/pumps and buildings, will likely put further stress on Plant 2 and could potentially cause solids backup into the effluent if not addressed soon. Miami-Dade should address the Plant 2 sludge digesters pursuant to the deadline in the new Consent Decree.

EFFLUENT PUMP STATION

Time of Entry: 5:53 PM

The EPA observed that the effluent automatic sampler was in the same new location as noted during the 2014 CEI. In addition, Miami-Dade has installed effluent pH, Turbidity, Dissolved Oxygen and Residual Chlorine meters, which were all in service at the time of this inspection.

The EPA noted that it appears that the Residual Chlorine dipped below 0.5 mg/L the day before this CEI according to the recording paper.

Effluent pump #2 had been overhauled and placed back into service on 12/9/2014 according to Mr. Saint-Phard. The EPA observed a seal leak at this pump during this CEI. *See enclosed photo.*

EXIT CONFERENCE

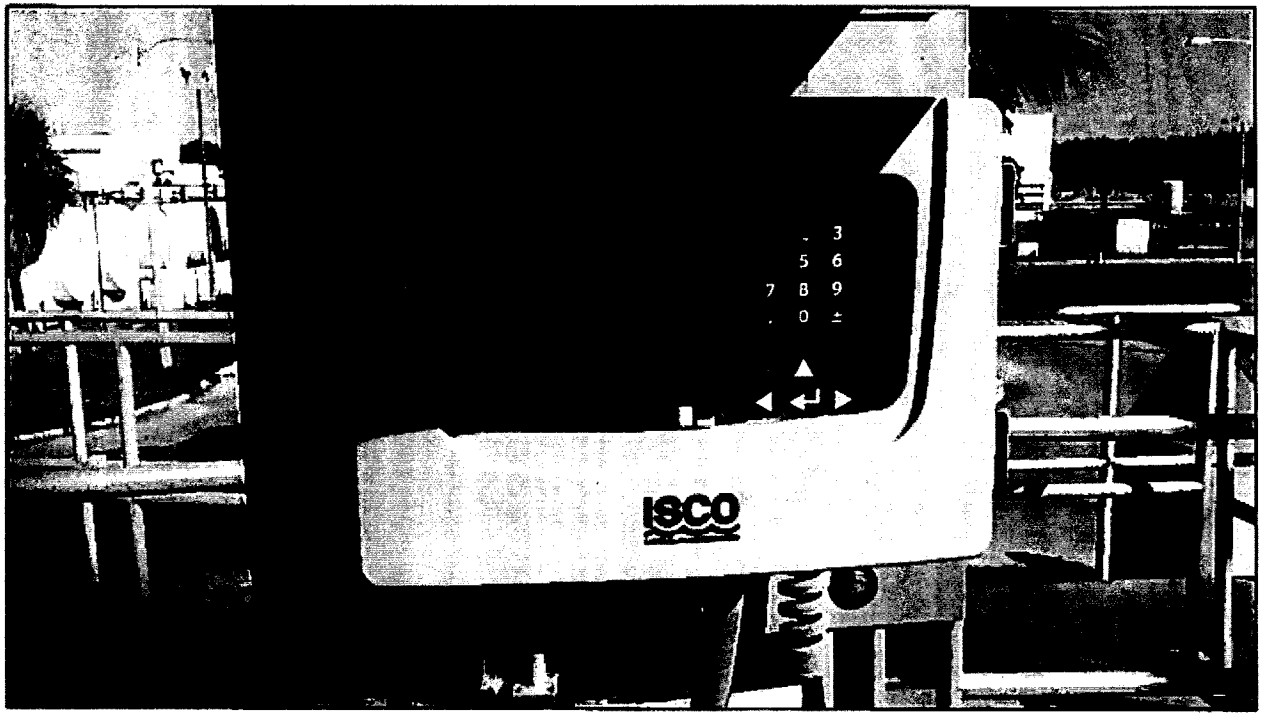
The EPA opened the exit conference with Mr. Saint-Phard by stating that improvements in equipment service had been noticed since the 2014 CEI. The EPA then outlined the following deficiencies and/or violations to Mr. Saint-Phard:

- Miami-Dade should have notified the EPA and FDEP within 24 hours of noticing the upset that started in late December 2014 according to Part II, Section D.8. of the EPA-issued NPDES permit;
- Staffing issues at the CDWWTP still appears to be a deficiency;
- Light floc, uneven flow and debris at weirs was noticed in the Plant 1 final settling tanks;
- According to records, it appears that it took approximately 13 days to recover from the December 2014 upset from Miami-Beach;
- On the June 2014 DMR cover letter, it was stated that Plant 2 was the problem, but according to records reviewed, it appears that Plant 1 was the culprit;
- Concern about the oxygen production plant #3 being out of service for 2 months even though it is a "backup" O_2 plant;
- CDWWTP still waiting on sludge hauling trucks to be delivered even though they've been paid for;
- EPA suggested that Miami-Dade should check their February and March sludge samples for metals to see if the metals were higher than normal after the December 2014-January 2015 upset;
- Plant 2's influent automatic sampler displayed a pump hose warning;
- The influent automatic samplers (Plant 1 and Plant 2) are pulling time composite aliquots when the effluent automatic sampler is pulling flow composite aliquots (NOTE: staff did tell the EPA that parts were in and to be installed soon to make the influent automatic samplers pull flow composite aliquots like the effluent sampler);
- Missing or broken label signs in the final settling tanks of both Plants;
- MLSS foam at the influent of the final settling tanks (Plant 2);
- Longitudinal structural cracks in both walkways and walkway support columns in the final settling tanks (both Plants);
- Water was somehow moving in final settling tank #10 of Plant 2 even though it was out of service;
- Miami-Dade needs to make a decision soon about what to do at the headworks of the CDWWTP (build new headworks vs. installing perforated screen in existing structures), especially if there are concerns of missing the final compliance date of this project under the Consent Decree.

Time of Exit: 7:15 PM.

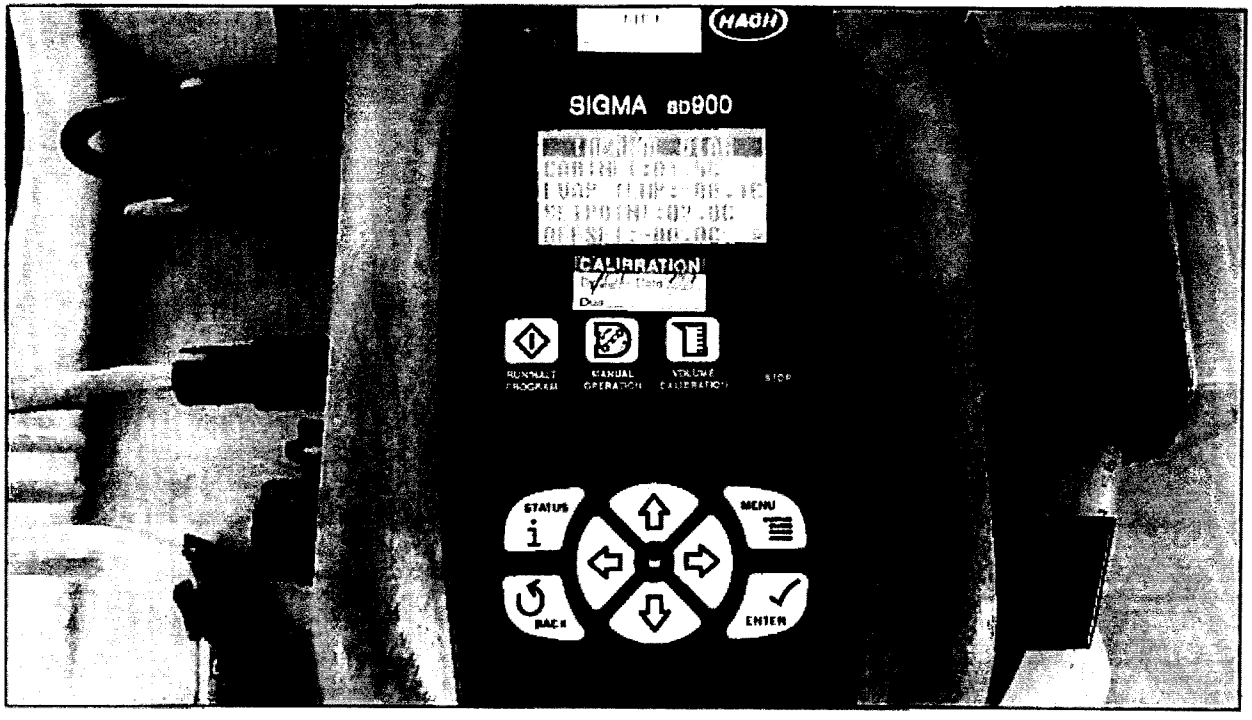
Miami-Dade Central District WWTP (EPA; 2/12/2015)

Plant 1 influent flow meter display (northern grit flume)



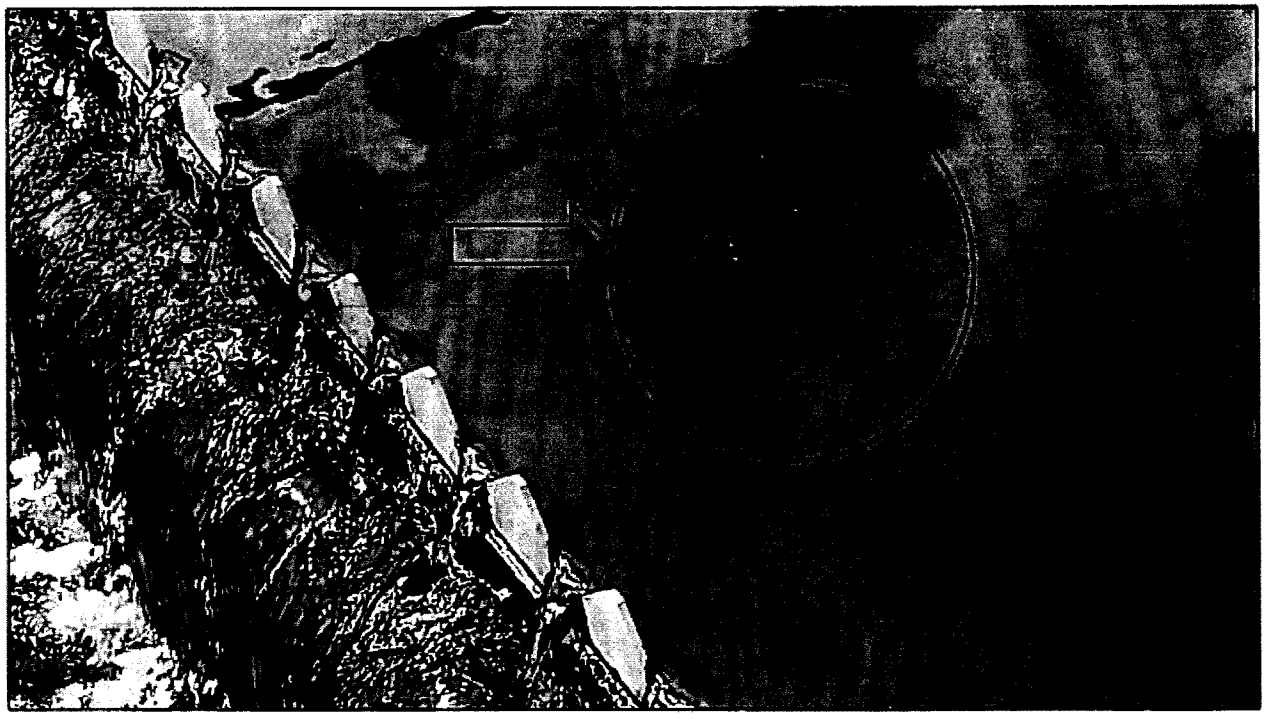
Miami-Dade Central District WWTP (EPA; 2/12/2015)

Plant 1 influent automatic sampler display



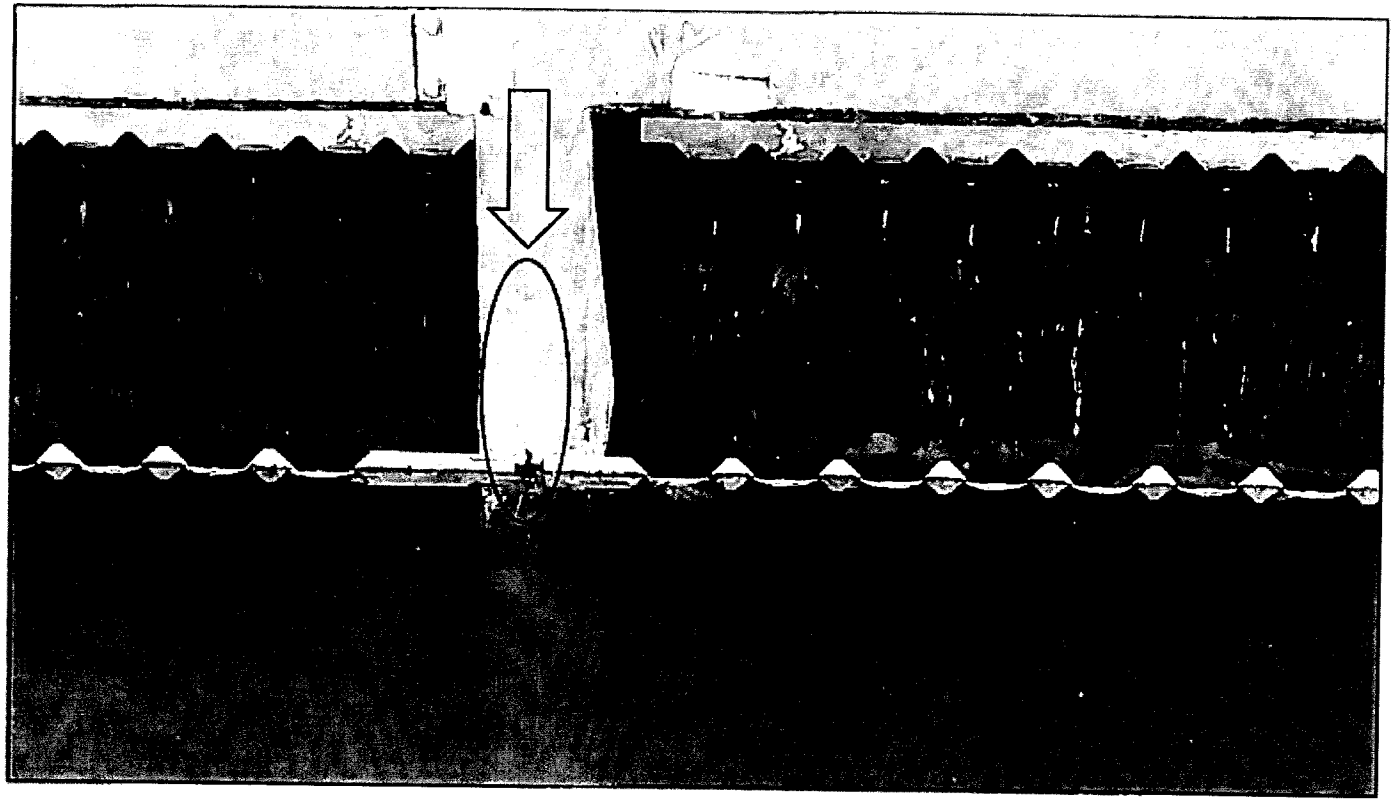
Miami-Dade Central District WWTP (EPA; 2/12/2015)

Plant 1, final settling tank #4C (note heavy flocculation)



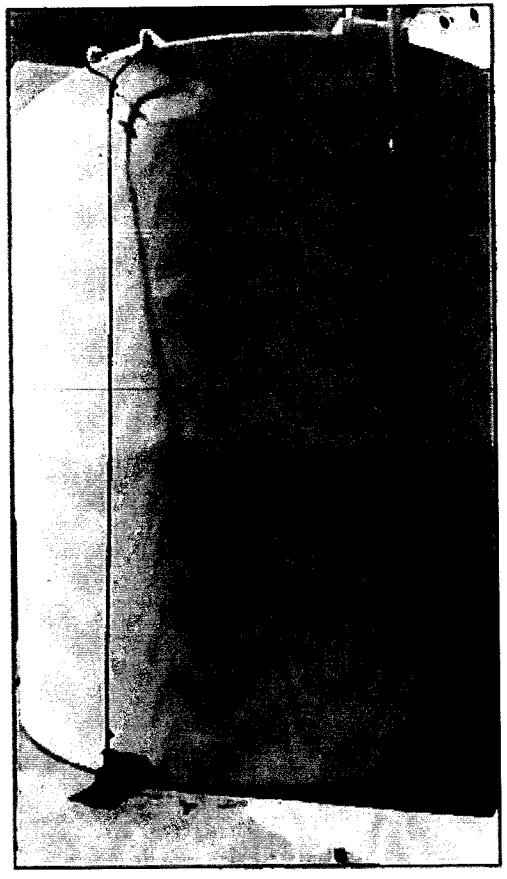
Miami-Dade Central District WWTP (EPA; 2/12/2015)

Plant 1, Final settling tank #4B (note structural crack in walkway support)



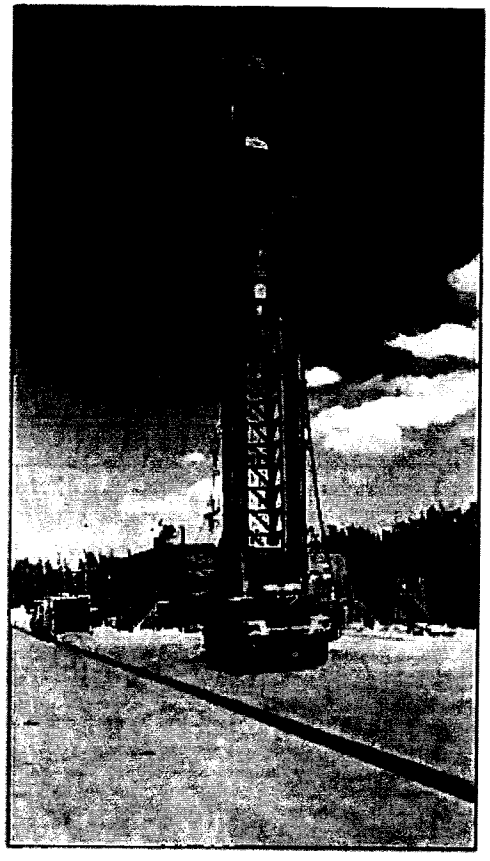
Miami-Dade Central District WWTP (EPA; 2/12/2015)

Ferric Chloride permanent tank with containment and controls outside sludge dewatering building



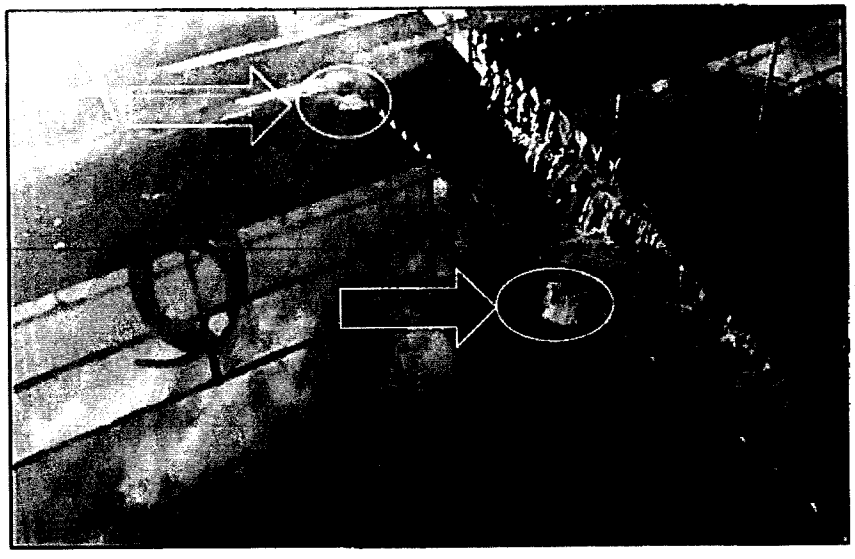
Miami-Dade Central District WWTP (EPA; 2/12/2015)

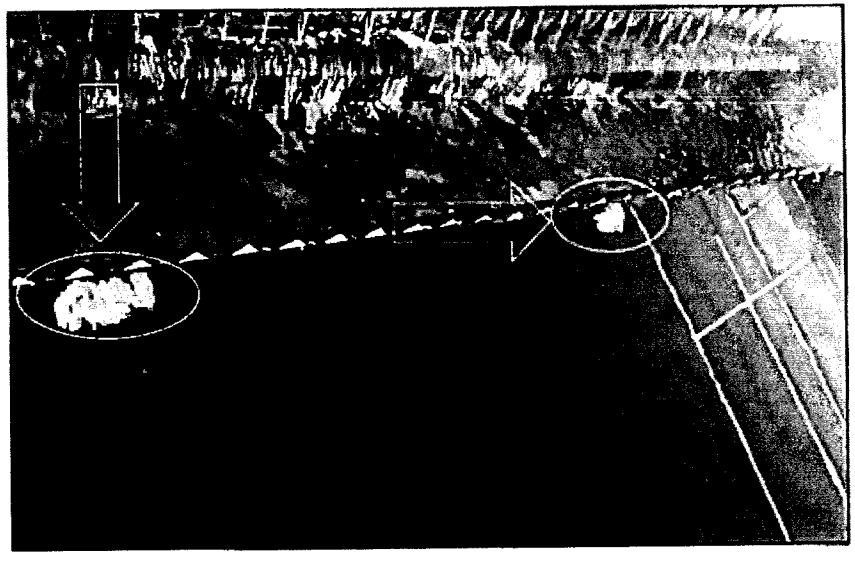
UIC exploratory well drilling (east of sludge dewatering building)



Miami-Dade Central District WWTP (EPA; 2/12/2015)

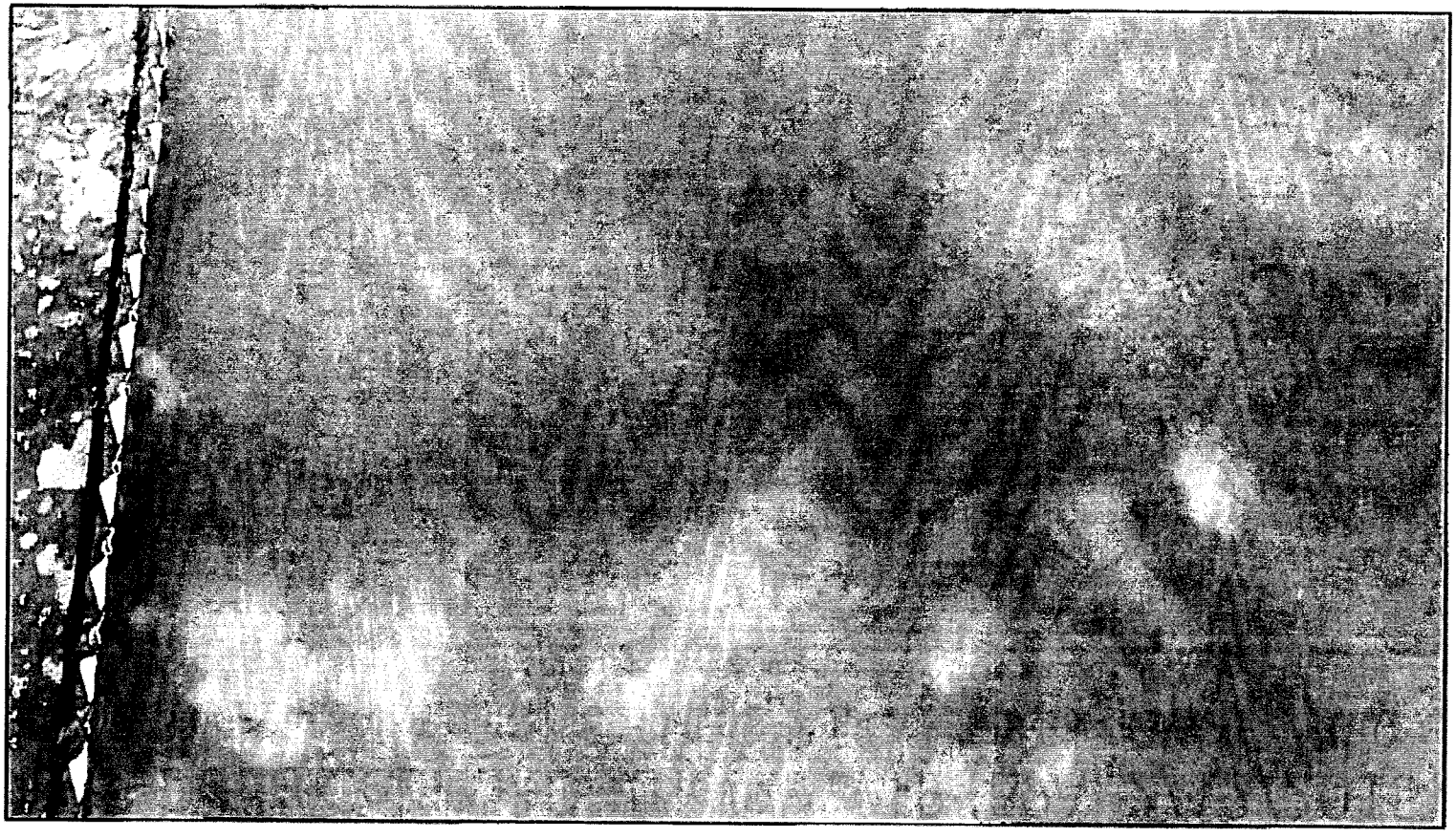
Plant 2, Final settling tanks #7A (Left) and 7B (Right) (note floatables)





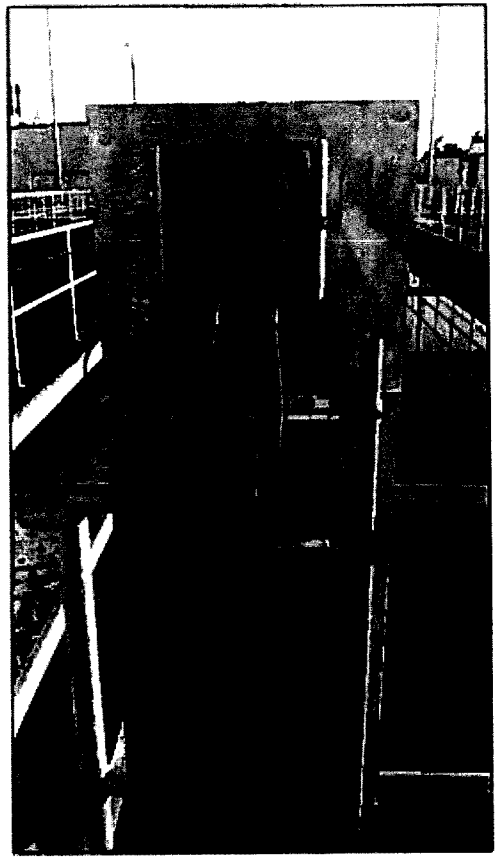
Miami-Dade Central District WWTP (EPA; 2/12/2015)

Plant 2, Final settling tank #7B (note heavy flocculation)



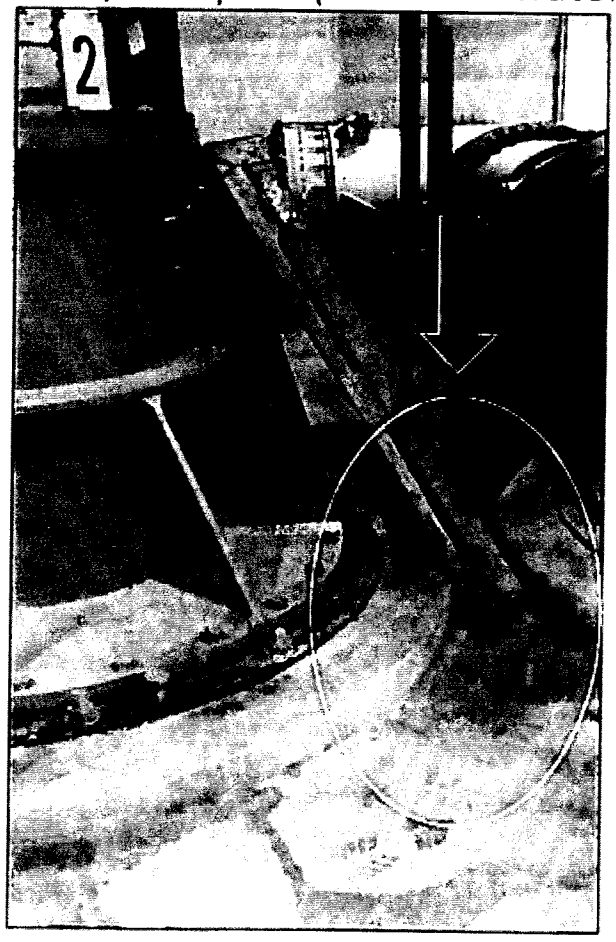
Miami-Dade Central District WWTP (EPA; 2/12/2015)

Plant 2, Sludge blanket meter at Final settling tank #9B for tanks #9 and 10



Miami-Dade Central District WWTP (EPA; 2/12/2015)

Effluent Pump Station, Pump #2 (note seal water leak on floor)



BLANK PAGE

#11

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 10 2016

CERTIFIED MAIL 7011 3500 0003 2064 3827
RETURN RECEIPT REQUESTED

NN, Inc.
c/o: Mary LeAnn Mynatt
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
265 Brookview Centre Way
Suite 600
Knoxville, Tennessee 37919

Re: Notice of Violation and Opportunity to Show Cause, NN, Inc., Erwin, Tennessee; Permit No. 012 issued by Erwin Utilities, Pursuant to Section 309(a) of the Clean Water Act (CWA), 33 U.S.C. § 1319(a)

Dear Ms. Mynatt:

On October 1, 2014, the U.S. Environmental Protection Agency Region 4, the State of Tennessee Department of Environment and Conservation (TDEC) and Erwin Utilities performed an inspection of NN, Inc.'s facility (Facility) located at 800 Tennessee Road in Erwin, Unicoi County, Tennessee. The inspection was part of a joint EPA and TDEC Pretreatment Compliance Inspection (PCI) of Erwin Utilities and its industrial users' compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); the regulations promulgated thereunder at 40 C.F.R. Parts 403 and 433; the State of Tennessee pretreatment regulations at Tennessee Rule 1200-4-14; and Permit No. 012 issued to the Facility by Erwin Utilities, effective July 1, 2011 and expiring June 30, 2015.

The EPA's inspection and subsequent investigative efforts have revealed that NN, Inc. failed to comply with Section 301 of the CWA, 33 U.S.C. § 1311 and 1317(d), and its implementing pretreatment regulations at 40 C.F.R. Part 403 and § 433.17, the State of Tennessee pretreatment regulations, and its Permit. Specifically, the EPA hereby notifies NN, Inc., pursuant to Section 309(a) of the CWA, 33 U.S.C. § 1319(a), of the following findings of violations:

1. New Source failure to install and operate pretreatment equipment prior to discharge.

   Pursuant to 40 C.F.R. § 403.6(b), the Facility is subject to the federal categorical pretreatment standards in 40 C.F.R. Part 433. The Facility is a new source, as defined in 40 C.F.R. § 403.3(m), because it originated after the EPA published proposed standards for Part 433 on August 31, 1982. NN, Inc. was thus required to install, and have in operating condition, all the pollution control equipment necessary to meet applicable Pretreatment Standards, including those in 40 C.F.R. § 433.17, prior to beginning discharge to the Publicly Owned Treatment Worker (POTW).

The Facility did not install such necessary pollution control equipment prior to beginning discharge to the POTW in 1996, and has not installed such equipment. The Facility thus has continued to discharge to the POTW without the necessary pollution control equipment, in continuing violation of 40 C.F.R. § 403.6(b).

2. Failure to report/record initial compliance with categorical standards.

Within 90 days after commencing a discharge to a POTW, a new source is required to report and maintain record of the self-monitoring information on its compliance with pretreatment standards, per 40 C.F.R. §§ 403.12(d), 403.12(g), 403.12(l) and 403.12(o).

Ninety days after commencing discharge to the POTW in 1996, the Facility did not submit a report to Erwin Utilities of its initial compliance with the categorical pretreatment standards in 40 C.F.R. § 433.17. The Facility has also not maintained the required record demonstrating its initial compliance with these pretreatment standards.

3. Failure to submit periodic reports on continued compliance with categorical standards.

Pursuant to 40 C.F.R. §§ 403.12(e), 403.12(g), 403.12(l) and 403.12(o), any industrial user subject to categorical pretreatment standards must submit to Erwin Utilities, and maintain its own records of, additional periodic compliance reports at least twice a year on its compliance with categorical standards and other information. From 1996 until the present, the Facility has not submitted to Erwin Utilities, or maintained its own records of, self-monitoring reports of compliance with the categorical pretreatment standards in 40 C.F.R. § 433.17.

4. Failure to comply with permit conditions.

Pursuant to 40 C.F.R. § 403.8(f), an industrial user holding a permit containing pretreatment standards and requirements must comply with its permit. The Facility held Permit No. 012 that included the following pretreatment standards and requirements:

Paragraph 7.9 of the permit lists the local limits for 25 different pollutants. On July 16, 2014, NN, Inc. violated the local limit for copper (Daily Maximum) outlined in Paragraph 7.9 of the permit. NN, Inc. subsequently sampled for copper six (6) more times in the same quarter to bring the Quarterly Average into compliance with the standard in Paragraph 7.9 of the permit.

Until compliance with the CWA is achieved, NN, Inc. is considered to be in violation of the CWA and may be subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

The EPA also requests that representatives of NN, Inc. contact the EPA within seven (7) business days of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against NN, Inc. for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. NN, Inc. should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial

information which may reflect an inability to pay a penalty. NN, Inc. has the right to be represented by legal counsel.

All information submitted must be accompanied by the following certification that is signed by a duly authorized company official in accordance with 40 C.F.R. § 403.12(l):

> "I certify under 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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the 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 knowing violations."

Please be aware that the EPA may use information provided during the meeting or telephone conference in any enforcement proceeding related to this matter. Failure to schedule a show cause meeting may result in a unilateral enforcement action against NN, Inc. Notwithstanding the scheduling of a show cause meeting, the EPA retains the right to bring further enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

To arrange a show cause meeting or if you should have any questions or concerns, please contact Mr. Phillip Mancusi-Ungaro, Attorney-Advisor, at (404) 562-9519.

Sincerely,

for

James D. Giattina
Director
Water Protection Division

cc: Ms. Yatasha Moore
Tennessee Department of Environment and Conservation

Mr. Jason Byrd
Erwin Utilities, Tennessee

BLANK PAGE

#12

RAYMOND E. HANSON, P.E., *Director*
9150 Curry Ford Road
Orlando, Florida 32825-7600
Telephone: 407-254-9809
Fax: 407-254-9899
Email: Ray.Hanson@ocfl.net

October 28, 2015

USEPA Region IV
Attn: Mr. Brad Ammons
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960

RE: Response to July 23, 2015 Notice of Violation and Opportunity to Show Cause and Compliance Evaluation Inspection Report; National Pollutant Discharge Elimination System Permit No.: FL0038849
Orange County East Service Area Wastewater Treatment Plant

Dear Mr. Ammons:

On behalf of Orange County (County) and the Orange County Utilities (OCU) department, I want to thank you and EPA Region 4 staff for meeting with County staff on September 15, 2015. This meeting provided an opportunity for the County to address the findings of the July 23, 2015 Notice of Violation and Compliance Evaluation Inspection (CEI) Report, including providing a detailed review of the County's wastewater operations, management, maintenance, and rehabilitation programs. This letter ("Response") serves as the County's reply to the issues raised in the CEI Report and supplements information presented during the September 15, 2015 meeting. Acronyms and abbreviations used in this letter and its attachments are defined in Attachment A to this Response.

OCU strives to operate in an innovative and proactive manner. OCU's management, operations and maintenance practices and assessment and rehabilitation programs are effective, providing comprehensive operational approaches which, among other things, have successfully reduced Sanitary Sewer Overflows (SSOs). As the EPA CEI Report indicates, OCU has initiated "a proactive Wastewater Collection and Transmission System

(WCTS) assessment and rehabilitation program." Successful results from these programs are delivered by an organization that is properly equipped and comprised of skilled staff that the CEI Report notes as "knowledgeable about the operation and maintenance of the system."

However, OCU also recognizes opportunities to strengthen programs that are in place and address gaps where identified. The CEI Report and discussions with EPA staff during the September 15, 2015 meeting identified three primary areas of improvement:

1. Sanitary Sewer Overflow (SSO) Reporting, Response, and Data Management;
2. Written Capacity, Management, Operations, and Maintenance (CMOM) Programs; and
3. Force Main Assessment and Rehabilitation Program.

This Response summarizes OCU's existing programs and identifies improvement areas where gaps exist, placing a focus on the above items. Specifically, this Response outlines the following plans, with related schedules, for enhancements and improvements to OCU's programs:

1. **Continue existing foundational programs** including fats, oils, and grease (FOG), private lift stations, gravity assessment and rehabilitation programs, lift station rehabilitation programs, and computerized maintenance management systems supported by Maximo and GIS platforms.

2. **Revise Sanitary Sewer Overflow Data Analysis and Reporting** – As discussed at our meeting, OCU can confirm that it has not violated the reporting requirements identified in the July 23, 2015 Letter and the CEI Report. Discussion of this review is included in Attachment C – Review and Discussion of Sanitary Sewer Overflow (SSO) Data. However, OCU appreciates EPA's guidance and, in response, OCU will review and revise existing response procedures including a focus on the following:

    a. Revising OCU SSO reporting procedures and forms;
    b. Revising internal records retention requirements and procedures;
    c. Modifying existing SSO response plans to provide specific policies and hierarchies for managing, reporting, and monitoring responses to SSO events;
    d. Revising building back-up procedures and data management; and
    e. Collaborating with the Florida Department of Environmental Protection (FDEP) to improve data integrity throughout the reporting process. OCU and FDEP have already met to begin this process.

3. **Accelerate OCU's Force Main Assessment and Rehabilitation Program** including:

    a. Accelerate force main rehabilitation - move 15 miles of Polyvinyl Chloride (PVC) Force Mains into the capital improvement program (CIP) for rehabilitation based upon the first phase of analysis results;
    b. Formalize the force main field assessment plan;
    c. Modify force main assessment program (ongoing and continuous, modify per field assessment plan); and
    d. Develop Force Main Master Plan as part of a formal written Infrastructure Rehabilitation Program.

4. Deploy **Written CMOM Program through an Environmental Management System** – OCU will deploy a formal environmental management system to ensure that management, operations, and maintenance programs have clear objectives, are formally documented, and have mechanisms in place to review and monitor effectiveness.

    a. Sewer Overflow Response Plan revisions;
    b. CMOM Gap Assessment;
    c. Pump Station Operation and Preventative Maintenance Program;
    d. Lateral and Root Program;
    e. Gravity Line Preventative Maintenance Program;
    f. Continuing Sewer System Assessment Program; and
    g. Environmental Management System Operational.

Further explanations and associated timelines for the above items are included in Attachment F – Schedule of Planned Actions. Attachment F provides detailed schedule information, including interim compliance dates, for completion of the above items. In general, OCU proposes completing all identified plans and programs within a 24 month period, commencing on January 1, 2016, and completing all commitments by the end of December 2017.

In addition, OCU's continuing assessment programs, including the accelerated Force Main Assessment and Rehabilitation Program, will identify capital improvement projects. Although OCU cannot predict with any certainty the number, magnitude, and timing of future identified projects, OCU will act quickly upon assessment findings to include projects in the County's CIP. OCU anticipates that most projects will follow a typical three year project cycle, from design to substantial completion of construction.

OCU believes that these ongoing and planned actions demonstrate the County's commitment to build on past successes by incorporating the recommendations from the CEI Report and the discussions on September 15. Lastly, the programs and activities conducted

by the County should demonstrate that the County has effective programs to manage, operate and maintain the County's collection and transmission system. While we recognize that those programs may be enhanced and improved, additional enforcement action is not warranted.

OCU is committed to protecting the environment and our citizens by operating our wastewater systems to meet all requirements of our many and various permits. We welcome the opportunity for any recommendations that you may have to improve and enhance our CMOM Programs. If you have any questions or need any additional information please do not hesitate to contact Todd Swingle at 407-254-9880 / todd.swingle@ocfl.net or me at 407-254-9817 / ray.hanson@ocfl.net.

Sincerely,

Raymond E. Hanson, P.E.
Director, Orange County Utilities

c:

Ajit Lalchandani, Orange County - County Administrator
Chris Testerman, Orange County - Assistant County Administrator
Todd Swingle, P.E., Orange County Utilities - Deputy Director
Tony Cotter, Orange County - Assistant County Attorney
Scott McHenry, Orange County - Assistant County Attorney
Susan Richardson, Kilpatrick Townsend & Stockton LLP - Outside Counsel
Bill Bush, USEPA Region IV Associate Regional Counsel

Enclosures:

Attachment A - Acronym List
Attachment B – OCU System and Wastewater Management Overview
Attachment C - Review and Discussion of Sanitary Sewer Overflow (SSO) Data
Attachment D - CMOM Programs – Operations and Maintenance
Attachment E - CMOM Programs – System Operation, Assessment, and Rehabilitation
Attachment F - Schedule of Planned Actions
Attachment G - Field Services Job Plans
Attachment H - SSO Data Tables

ATTACHMENT A
ACRONYM LIST

ACRONYM LIST

ARV	Air Release Valve
BMP	Best Management Practices
BC	Brown and Caldwell
CCTV	Closed Circuit Television
CIP	Capital Improvement Program
CEI	Compliance Evaluation Inspection
CMOM	Capacity Management Operation & Maintenance
CSSAP	Continuing Sewer System Assessment Program
ECS	Environmental Compliance Section
EMA	Environmental Management Associates, Inc.
EMS	Environmental Management System
EPA	Environmental Protection Agency
EPD	Environmental Protection Division
ERG	Orange County Enforcement Response Guide
ERP	Orange County Enforcement Response Plan
FSC	Field Services Center
FDEP	Florida Department of Environmental Protection
FOG	Fat, Oils and Grease
FTE	Full-time Equivalents
GIS	Geographic Information System
IRP	Infrastructure Rehabilitation Program
KPI	Key Performance Indicator
MGD	Million Gallons per Day
MOM	Management Operation & Maintenance
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
O&GPP	Oil & Grease Prevention Program
OCU	Orange County Utilities
PVC	PolyVinyl Chloride
R&R	Renewal and Replacement (a.k.a. Infrastructure Rehabilitation Program)
SCADA	Supervisory Control & Data Acquisition
SSO	Sanitary Sewer Overflow
SORP	Sewer Overflow Response Plan
SOP	Standard Operating Procedure
VCP	Vitrified Clay Pipe
WCTS	Wastewater Collection & Transmission System
WWTP	Wastewater Treatment Plant

ATTACHMENT B
OCU SYSTEM AND
WASTEWATER MANAGEMENT OVERVIEW

SERVICE AREA AND FINANCIAL OVERVIEW

OCU supports a vibrant and growing residential, commercial, and tourist population by providing water and sewer services across a service area that covers approximately 1,000 square miles. Currently, OCU's countywide customer base consists of approximately 150,000 sewer connections supported by an infrastructure network that includes three regional wastewater facilities having a current combined capacity of 72.3 MGD (expansions underway to 91.3 MGD), 745 pump stations, 576 miles of force mains, and 1,286 miles of gravity mains. In the Eastern Service Area, served by the Eastern Water Reclamation Facility (NPDES Permit #FL0038849), OCU's infrastructure includes 19 MGD of current treatment capacity (under construction for expansion to 24 MGD), 321 pump stations, 227 miles of force mains, and 512 miles of gravity mains. The Eastern Service Area is the only area addressed by EPA's August 28, 2014 Information Request under Section 308 of the Clean Water Act (308 Request) and the resulting July 23, 2015 Notice of Violation and CEI Report.

The County operates its water and sewer utility as a separate enterprise fund. Funding for OCU is derived entirely from water and sewer rates and fees charged to its customers, capital charges applied to new or expanded service connections, and (infrequently) grants and other financial awards by the state or federal government. The Orange County Board of County Commissioners has consistently supported effective rate strategies, cognizant of ensuring affordable services while increasing rates where necessary to support responsible investment in the utility. Rates are reviewed annually, which for FY 2016, resulted in approval of a 3% rate increase. The utility is well managed and fiscally sound.

The County's most recent bond rating, conducted in 2011 by Moody's, was AA2. The County is currently in a bond review process as OCU prepares to issue revenue bonds of approximately $87 to $128 million over the next three years. These bond proceeds will support a capital improvement program (CIP) investing over $410 million, of which approximately $265 million will be dedicated to wastewater systems over the next three years. This investment builds on $149 million in capital improvements that OCU has invested in the wastewater system since 2010.

OCU WASTEWATER MANAGEMENT HISTORY

OCU has a long history of implementing environmental and performance management improvements throughout its operations. Today, 87% of the 53 million gallons of wastewater treated daily by OCU is reused in a manner that results in <u>no</u> surface water discharge. This investment in reclaimed water infrastructure dates back to 1986 when Orange County, in partnership with the City of Orlando, formed Water Conserv II. Water Conserv II is the largest agricultural reuse project of its kind in the world, combining

agricultural irrigation with aquifer recharge via rapid infiltration basins. The effect today for OCU is that approximately 17 billion gallons of water annually is never discharged to surface water. As OCU continues to invest in its operations, providing facilities that minimize the discharge of effluent and associated nutrients to surface waters remains a foundational principle for our utility and a critical component of OCU's infrastructure investment.

Over the last 15 years, OCU has continuously enhanced its sewer collection systems. Some of the highlights are:

- **Transition to PVC Force Mains** –Beginning in the 1990's, as a proactive measure to address infrastructure deficiencies and risk exposure, OCU transitioned from metallic sewer mains to corrosion resistant piping. OCU now requires that all force mains be constructed of PVC if available in the size range required. Further, OCU initiated a practice of replacing metallic force mains located within the limits of road projects. Metallic force mains smaller than 14 inches in diameter are replaced regardless of condition, while larger mains are assessed and replaced as appropriate. In response to initial PVC force main failures, OCU conducted an intensive review and analysis regarding the cause of these failures. OCU determined that installation practices commonly utilized throughout the industry were a primary contributor. As a result, OCU updated its PVC construction standards to vastly increase its oversight and training of contractors and ensure greater reliability in all new construction.

- **OCU Fat, Oil and Grease (FOG) & Private Lift Station Program** – Launched in 2002, the OCU FOG and private lift station programs as authorized by County ordinance contain detailed management and enforcement requirements to control the entry of FOG into the County's collection and transmission system.

- **Voluntary CMOM Audit Program** – OCU conducted its first voluntary self-audit in 2004 with the support of consultants including EMA, Inc., and other local consultants. OCU revisited this work in 2008/2009 again supported by EMA, Inc. Output of these efforts prompted development of assessment, work management and response programs for the County including:

- SSO estimating and reporting procedures;
- Emergency preparedness, response and reporting protocols;
- Standards and construction specifications revisions;
- Operations staging and deployment plans;
- Work order management process improvements; and
- Comprehensive Renewal and Replacement (R&R) / Infrastructure Rehabilitation Program (IRP).

- **Maximo Work Management** – OCU has embraced technology as a significant component of its CMOM initiatives. Specifically, the Maximo asset management system is a core component of managing, operating, and maintaining OCU's large and complex utility operation. Originally deployed in 1999, the current Maximo instance now has over 700 active users and 675,000 operating assets. In 2014, the Maximo system supported nearly 275,000 work orders across OCU. The Maximo system also integrates with OCU's GIS system to provide a comprehensive tool set to plan and manage CMOM programs. OCU's GIS system is comprehensive and includes all major assets – assets pertinent to this response include pump stations, gravity mains and manholes, valves, air release valves, and force mains.

- **Infrastructure Rehabilitation / Renewal and Replacement (R&R) Program** – In 2008, OCU hired Brown and Caldwell to assist the County in developing and administering a comprehensive infrastructure rehabilitation (IRP) / renewal and replacement (R&R) program. Since that time, the County has developed overall strategies for each major wastewater component, formed cross-functional working teams that meet regularly, moved significant numbers of projects into its current 5-year capital improvement program, and established priorities and work processes to execute in-house system repairs.

These programs have achieved the following:

- **Gravity Assessment and Rehabilitation** –
  - Accelerated OCU's gravity inspection program achieving the program's cyclical cleaning and inspection goals of 5 years for vitrified clay pipe (VCP) and 10 years for PVC; and
  - Inspected 92% of VCP, the highest priority portion of the gravity collection system, and 50% of the entire gravity sewer system since 2010. All identified defects in the inspected mains are either already complete or programmed and funded within the current 5-year CIP; and
  - Implemented a smoke testing program that has tested over 125,000 properties and corrected more than 6,300 defects.

Pump Station Assessment and Rehabilitation –

- Completed a comprehensive condition assessment in 2013 of 676 of the County's duplex and triplex pump stations (100% of stations for the target size range in service at the time of inspection); and
- Developed a capital improvement program that provides for rehabilitation by 2020 of all pump stations from the above assessment with a criticality rating of 2 or greater on a 4 point criticality scale.

- **Force Main Assessment and Rehabilitation –**
  - Replaced, retired, or programmed construction for over 140 miles of force main, including over 37% of the County's ductile iron force mains.

- **FOG and Private Lift Station Program -**
  - Actively manage the OCU oil and grease prevention program by identifying, inspecting and ensuring compliance for 2,460 commercial sources of oil and grease discharging to the County's sanitary system; and
  - Ensure that private lift stations are being maintained and cleaned, and waste removal is reported properly by the private contractors responsible for these activities. This new program continues to expand and is now reaching approximately 600 stations, representing 50% of the private stations that are located within OCU's service area.

The County is committed to the health and safety of the public and protection of water resources through effective management of OCU's infrastructure, including focusing on SSO reduction. OCU has initiated many programs to provide these results, while recognizing the need for continual improvement in our operations. The remainder of this Response specifically addresses EPA's input provided in the CEI report, questions raised or issues identified during the September 15th meeting, and plans and schedules for improvement of CMOM programs related to these discussions.

ATTACHMENT C
REVIEW AND DISCUSSION OF
SANITARY SEWER OVERFLOW (SSO) DATA

SANITARY SEWER OVERFLOWS (SSO'S)

EPA's Notice of Violation and CEI Report dated July 23, 2015 cited the following regarding SSOs:

> *"During the period of September 1, 2009 through September 30, 2014 the County had at least 87 Sanitary Sewer Overflows (SSOs) totaling at least 4,144,85 gallons of untreated sewage that discharged from the County's WCTS to navigable waters of the United States..... In addition, the County had a least an additional 117 SSOs totaling at least 586,756 gallons of untreated sewage that was released from the WCTS and that did not reach navigable waters of the United States. ..... All 204 SSOs are indicative of the County's violation of Section IX.7. of the County's NPDES permit No..: FL0038849..... failing to report at least 44 SSOs to the State of Florida and / or violated Section 308 of the CWA by failing to report at least 50 SSOs to the EPA in response to the EPA information request...."*

As discussed at the September 15th meeting, OCU confirms that it has not violated the reporting requirements identified in the July 23, 2015 Notice of Violation and CEI Report. Information presented by OCU at the meeting identified inconsistencies in the data sets provided to EPA by FDEP[1]. The EPA Letter identifies a total of 204 events, whereas OCU's review of data confirms 155 events. It should be noted that, subsequent to the CEI Report, OCU did identify one 300 gallon spill that did not reach surface waters, which was not included in the OCU's October 28, 2014 response to the 308 Request (308 Response). This small event occurred on September 30, 2014 but was reported on October 1, 2014. As a result, the database query using reporting date based on the date parameters of the 308 Request did not identify this spill. This event is included in OCU's confirmed 155 events.

Beyond this one spill that inadvertently was not included in the 308 Response, OCU confirms that a total of 49 events in the 204 events included in the July 23, 2015, Notice of Violation and CEI Report were based on information inconsistencies in the FDEP data relative to the parameters of the data requested by EPA in the 308 Request.

1. FDEP Data not applicable to the Eastern Water Reclamation Facility WCTS, NPDES Permit Number FL0038849, which was the scope of the 308 Request. **49 events.**

---

[1] OCU's analysis and discussion below is based upon comparing the following data sets: OCU's complete dispatch data; OCU's response to the EPA data request; FDEP's data response to EPA, subsequently forwarded to OCU by Mr. Ammons, which includes 2014-2015 OCUD spills.xlsx and OCUD Eastern FL0038849.xlsx.

a. Break of treated reclaimed water main – 1 event.

b. Private system releases not within the ownership or operational control of OCU – 3 events.

c. Releases at the EWRF Plant – 6 events (5 of which were effluent, one involved 1500 gallons of raw sewage, which did not reach navigable waters.)

d. Service areas not covered by NPDES Permit Number FL0038849 – 39 events (33 involved sewage spills and, of those, only 2 reached navigable waters.)

2. Events reported by OCU in the 308 Response but not in FDEP database – **44 events.** OCU has confirmed all 24-hour email notice (date and time) events and also has identified the work order number for the five day reporting requirement, thus confirming that all 44 events were reported to FDEP.

Data tables reflecting these events are included in Attachment H – SSO Data Tables.

Assessing Discharges to Waters of the United States

From the compiled data, there is consistency regarding the total number and volume of SSO events associated with the Eastern Water Reclamation Facility (155 events estimated as 4.2 million gallons). However, a key point of discussion during the meeting on September 15 related to events reaching navigable waters of the United States. OCU's SSO reporting form prompts the user to provide a variety of information including whether discharges to surface water occurred and the name of any receiving water body. The form is structured to collect estimated data for the total spill volume, recovered quantity, and estimated volume of discharge to surface water, if present. The quantity of overflow to surface water noted from these forms represents OCU's primary mechanism for determining the volume discharging to navigable waters of the United States.

While OCU identified events that reached navigable waters of the United States per our SSO field reporting forms, EPA cites a higher number of events based upon key words in the spill description such as storm pond, ditch, swale, or storm drain. Subsequent to the September 15 meeting, OCU conducted a second review of its reporting forms to confirm the number of spills reaching navigable waters of the United States. It should be noted that as a result of that review, OCU has included an additional two events as potentially reaching navigable waters. Although OCU cannot conclusively determine for these two events that the spill reached navigable waters, OCU has included 1) a discharge to a wetland that does not appear to be isolated and 2) an event that discharged to a ditch during a noted storm event where a high volume of rainwater was observed in the stormwater management system (however, no determination was made that stormwater in the system or the sewer spill reached waters of the United States). Other than these two additional events, OCU believes that of the 87

events identified by EPA as reaching navigable waters, only 12 of these may have reached navigable waters.

Orange County's SSO form provides separate volume estimates for the total SSO event and the volume discharged to surface water. This practice reflects the complexity of managing SSO events with extensive and varied types of surface conditions. The following table summarizes the SSO data based upon OCU's analysis of these words contained in the SSO reports.

Discharge Point	Event Count	Total Overflow (gallons)	Overflow Recovered (gallons)	Overflow to Navigable Waters (gallons)
Surface Water & Wetland	12	2,575,686	980,620	1,535,935
Pond	20	990,548	540,363	0
Ditch / Swale	12	72,950	63,500	0
Storm Drain	46	283,157	77,385	0
Total	90	3,922,341	1,661,868	1,535,935

Based on discussions during the September 15 meeting, OCU believes that further discussion of the State of Florida's comprehensive stormwater management requirements is warranted. Although OCU completely agrees with EPA that stormwater management structures are not intended to relieve OCU of its permit requirements to prevent SSOs, the stormwater management structures required by FDEP often present a barrier of protection to surface waters from SSO discharges that do occur.

Stormwater infrastructure, which includes stormwater ponds, is prevalent throughout Florida, driven by Florida's long standing stormwater management rules. This is particularly true in many new growth communities, such as Orange County, that have experienced a majority of their population growth since inception of the State's comprehensive stormwater management rules. Florida's Stormwater Rule was implemented in February 1982 by the Department of Environmental Protection (the Department of Environmental Regulation at that time). The rule requires all new developments, redevelopment projects, and most modifications of stormwater systems to use appropriate Best Management Practices (BMPs) to treat the first flush of stormwater, and to remove at least 80% of the annual average pollutant load.

Typically, stormwater systems in Florida include a system of drains, ditches and/or swales leading to either a wet or dry stormwater pond. Since 1980, Orange County's population has doubled from approximately 475,000 to more than 1.2 million. The implication is that a majority of the County's development occurred after these rules were enacted and, therefore, include the required stormwater management infrastructure. Currently, Orange County Public Works Roads and Drainage Division maintains the County's stormwater management system which includes over 1,700 stormwater ponds (most new subdivision or commercial development includes a stormwater pond or man-made detention/retention system).

Stormwater systems are designed to capture the large volumes associated with run-off from an inch of rainfall over a drainage basin. This infrastructure quickly routes water to the stormwater ponds, where it is detained/retained and passively treated. These ponds are also maintained periodically by removing silt and sediment. Because our wastewater system infrastructure is co-located in public right-of-ways with stormwater collection systems, discharges from SSOs will often follow this flow path. While not intended to manage SSOs, the stormwater ponds (wet or dry) represent the point where we are able to recover or otherwise manage the releases from SSOs. Practices that OCU employs to manage events of this nature include:

- Reporting to FDEP of all spills regardless of size and discharge location;
- Notification and oversight by the County's Environmental Protection Division (EPD) for spills exceeding 1,000 gallons. The County's EPD oversees many permitting, inspection, complaint investigation, and compliance activities for many environmental programs relating to air, surface water, groundwater, hazardous materials, petroleum/pollutant tanks and the environment in general;
- Deployment and/or construction of berms, floating barriers, or other techniques to prevent migration and improve recovery of SSO fluids and solid materials;
- Inspection of stormwater pond discharge points to properly report discharge of SSO materials to navigable waters and/or to deploy plugs or barriers where feasible to prevent such discharges;
- Recovery of SSO materials using tankers or pumps where feasible. Note that from the 4.2 million gallons of SSO events reported in the CEI, OCU recovered over 1.9 million gallons of fluids to manage the impact of SSO events;
- Monitoring and bacteriological sampling of stormwater ponds to achieve background conditions when determined appropriate by EPD; and
- Posting of surface waters when determined appropriate by EPD.

OCU effectively deploys these methods in response to SSO events, but recognizes opportunity for improvement from our discussions with EPA. Specifically, OCU plans the following improvements:

- Modify spill response plans and job plans to provide specific response hierarchies and procedures for responding to SSO events. The strategies will include control and recovery as a preferred approach, on-site treatment and/or impact reduction approaches where recovery is not viable, and monitoring and bacteriological sampling for spills over 1,000 gallons to stormwater systems to ascertain return to background conditions.
- Revise the OCU SSO reporting forms. Collaborate with FDEP to ensure that adequate information is provided in a format that fully characterizes each event.

As recognized in the CEI report, Orange County's personnel are "knowledgeable about the operation and maintenance of the system." OCU's staff are skilled and diligent in their efforts to manage and minimize the impacts of SSO events. The proposed actions will build upon these capabilities to ensure that our actions are consistent across the organization and match or exceed the requirements of the event.

Summary Regarding SSO Events

OCU is committed to reducing SSOs, regardless of the source or point of discharge. Independent of the quantities determined to have reached navigable waters of the United States, OCU's SSO reduction plan will focus on sustaining programs that are in place and working well, while making improvements and enhancements as guided, in part, by the CEI Report and discussions with EPA.

OCU has identified several opportunities to improve its SSO response and reporting:

- Revise the OCU SSO reporting form to provide more specific details of SSOs, and complex events. Link SSO reporting information to detailed resolution and mitigation documentation;
- Modify existing SSO response plans to provide specific policies and hierarchies for managing and monitoring SSO events that enter stormwater management systems;
- Collaborate with FDEP to improve tracking and reporting mechanisms, enhance visibility of complex event details, and reduce tracking errors between entities; and
- Incorporate each of these improvements in a revised Sewer Overflow Response Plan (SORP) proposed as part of the CMOM / Environmental Management System (EMS) Program development.

OCU believes that these items, coupled with the management system approach proposed herein, will ensure consistency in our response actions and promote alignment between OCU and the regulatory agencies regarding the nature and impact of SSO events.

ATTACHMENT D

CMOM PROGRAMS

OPERATIONS AND MAINTENANCE

CMOM Programs

The CEI Report indicates that OCU does not have formal written Management, Operations, and Maintenance (MOM) plans. While this may be correct in the traditional sense, OCU has focused on managing work flows through Maximo, an extensive computerized maintenance management that automates plans and procedures for addressing many issues noted in the CEI Report. OCU implemented Maximo in 1999, and enhanced the tool as a result of continual improvement activities, including the comprehensive voluntary CMOM Audit Program in 2004. This computerized maintenance management approach provides an effective and efficient way to manage, operate and maintain OCU's system. However, OCU realizes that a more formal program to create interconnections between program elements and enhance visibility and review/audit of procedures is important. OCU presents a schedule for developing this more formalized program in Attachment F – Schedule of Planned Actions.

The remainder of this Attachment D discusses OCU's approach to managing operations and maintenance activities including discussion of specific items requested by EPA: 1) operations and maintenance procedures, 2) FOG programs, and 3) blockages, building back-ups, and root control. Operations and maintenance of OCU's main infrastructure components including gravity mains, force mains, and pump stations are also covered in this Response. However, because these activities are intertwined as part of the OCU Infrastructure Rehabilitation Program (Renewal and Replacement [R&R] Program), discussion of these items is included in Appendix E - CMOM Programs - System Operation, Assessment and Rehabilitation.

Operation and Maintenance Programs.

Process Management Using Technology Solutions (Maximo)

Maximo serves as the foundation for OCU's asset management and work order system. This tool is essential for effective management, operation and maintenance of OCU's large and complex utility operation. Maximo also interfaces with other software systems at OCU including Geographic Information Systems (GIS). These technology systems represent the primary way OCU plans and executes work.

The Maximo system is used to comprehensively track individual assets, schedule work activities, and maintain records of maintenance activities over time. Assets and work processes pertinent to this response that are included in the Maximo system include SCADA, warehouse operations, pump stations, force mains, air release valves (ARVs), gravity systems (including CCTV), and line locates.

OCU utilizes job plans embedded in Maximo to detail the description of work tasks (operations), labor, materials, and tools to be performed for a particular type of job. A list of job plans for the OCU Field Services division is included in Attachment G – Field Services Job Plan List.

While job plans encompass OCU's standard method of executing work, work orders drive daily business process within the Field Services Division. Building upon the processes specified by job plans, work orders specify personnel assignments, due dates, and often combine several job plans to execute a project. Work orders may be for repetitive planned events (e.g. pump station cleaning, pump station annual inspection), non-repetitive planned events (e.g. CCTV inspections driven from R&R, point repair requests arising from inspections, planned lift station rehabilitation), or unplanned maintenance or response activities (e.g. SSO response, communications power failure at stations). The work order system enables OCU to effectively respond to work needs, allocate resources, specify work activities and practices, and track the results of maintenance activities.

While OCU's work order management system is extensive and robust, we value the input received from EPA. Specific to our work management systems, OCU has identified the following improvements:

- Improved definition and visibility of goals driving planned work orders;
- Documented training on critical procedures and work practices to include SSO response; and
- Improved connectivity of job plan and work order systems into a visible and documented management, operations, and maintenance program.

The above improvements will be delivered through the CMOM program deployed as an Environmental Management System (EMS). Please see Attachment F – Schedule of Planned Actions.

FOG Program.

FOG Program Authority and Requirements

Launched in 2002, the OCU FOG and private lift station programs are authorized by County Ordinance. The requirements of this program are set forth in Orange County Code Section 37-754 and give OCU the legal authority to:

- control residential and commercial sources of FOG;
- require non-commercial high density multi-plex developments (apartments, condos, etc.) to install FOG pretreatment devices, clean their wastewater collection system to remove said waste and/or educate individual users to control excessive FOG discharges to the County's wastewater collection system;
- require commercial customers that contribute or have the potential of contributing FOG (or excessive solids) to provide a county-approved FOG pretreatment device, participate in the County's Oil and Grease Prevention Program (O&GPP) and comply with program requirements;

- issue Registration Certificates to O&GPP customers establishing the minimum FOG pretreatment device cleaning frequency required to be performed by the customer, and as determined by OCU;
- assess user fees associated with O&GPP costs;
- require O&GPP customers (and their waste haulers) to submit a waste disposal manifest form to OCU verifying the proper disposal of wastes removed from FOG pretreatment devices;
- prohibit the discharge of any additives to the OCU sanitary sewer by commercial customers without director approval, and strictly prohibit the discharge of any enzyme or bacteria product to any sanitary sewer discharging to OCU sanitary sewer; and
- assess administrative penalties, enforcement remedies and pursue judicial enforcement to any user in violation of established O&GPP requirements or found to be contributing to the pass-through of FOG to the County's WWTP.

Orange County Code Chapter 37, Article XX was revised in July 14, 2009, (Ordinance 2009-19). This update established the following:

- required consistency with revised 40 CFR Part 403 (and related Streamlining Rule provisions);
- gave authority to establish the use of a Hearing Officer and related appeals hearing process;
- set the minimum civil penalty for any violation of Chapter 37 Article XX to be $2000/day;
- created Waste Hauler Operating Permit provisions (including expanded waste manifest usage requirements) for waste haulers supporting O&GPP customers or discharging wastes at the County's Septage Receiving Station;
- outlined minimum maintenance, emergency response, emergency signage, waste disposal manifest reporting and maintenance contract requirements for private lift stations;
- stated code variance request procedures for an O&GPP user to modify (reduce) the minimum cleaning frequency; and
- stated code variance procedure for commercial users proposing to use a bacteria product intended to treat private kitchen drain lines (and excluding the treatment of wastes in any FOG pretreatment device).

In summary, OCU has authority to control the discharge of FOG into its wastewater collection, implement O&GPP requirements, and enforce violations of county code or O&GPP requirements. The requirements of this program are set forth in Section 37-754, Orange County Code[1].

FOG Program Administration

The OCU Environmental Compliance Section (ECS) has developed and fully implemented the O&GPP, which includes the development and daily use of the O&GPP database. Critical user information is maintained in the O&GPP database, including property ownership, facility management contact information, grease prevention device type, quantity and capacity, minimum required grease prevention device cleaning frequency, and the dates of previous ECS inspection and user manifest form submissions. User compliance is tracked in the O&GPP database from waste disposal manifest dates, field inspection report and Field Notice of Violation (NOV) compliance requirements, and formal noncompliance activity due-dates. The compliance and enforcement status of all O&GPP users is maintained in the O&GPP database.

ECS O&GPP staff follow numerous written standard operating procedures (SOPs) developed to support user inspection (including kitchen inspection and grease prevention device inspection and sludge judging), ensuring:

- Waste disposal manifests are retained on-site for ECS inspection;
- User interior grease trap maintenance & inspection logs are reviewed;
- Logbooks are maintained;
- Users are educated about FOG pretreatment device maintenance & inspection, kitchen best management practices (BMPs), grease prevention device maintenance, reporting requirements, and grease trap cleaning procedures;
- Private collection system are inspected; and
- Private SSO notification procedures, OCUD emergency notification procedures and code variance request reporting procedures, etc., are followed.

FOG Program Summary

The OCU FOG program continues to be a model for success. Customer compliance through the O&GPP has largely eliminated commercial grease blockages in downstream lines. The County will continue its thorough implementation of this program, while continuing to expand outreach from commercial to single and multi-family residential customers. OCU's data support an increased focus on residential areas since grease from commercial entities

[1] Chapter 37, Article XX may be found at following Municode web link: https://www.municode.com/library/fl/orange_county/codes/code_of_ordinances?nodeId=ORCOCO_CH37WAWA_ARTXXPUPRSESYUSRE_DIV3PRWA_S37-754COOIGRPRPROG.

is being effectively controlled. Overall, the County is encouraged by the success of the O&GPP and the reductions in grease-related SSOs achieved since its inception.

Blockages / Building Back-ups and Root Control

As discussed at the September 15th meeting, OCU has practices in place to address blockages and building back-ups. As FDEP does not require reporting of blockages and building backups, these events have not been tracked as SSOs. However, OCU does maintain records of claims in the County's Safety and Risk Management Division involving blockages and back-ups where the County owned portion of a lateral (from the main to the property line) was a contributing factor.

In support of this Response, OCU reviewed claims data through the Orange County Safety and Risk Management Division to further evaluate "building backups". OCU's claims data includes both reimbursements for blockages that may or may not have resulted in flow leaving the pipe (typically plumber expenses) and building back-ups resulting in significant cleanup and/or damages to the building. OCU's data does not currently differentiate these events, however event notes are present that indicate if building damage occurred. Review of OCU's 2014 Risk Management data indicate that 20 such events with building damage occurred system wide. Across a customer base of over 140,000 connections equates to a rate of approximately 0.014% per customer per year.

The EPA meeting was helpful to OCU to identify the need to better track these events. Response and tracking of blockages and building backups will be included as a component of the revisions to OCU's Sanitary Sewer Overflow Response Plan. OCU will further review these data collection processes to determine how the information can be captured and managed within our business practices. Specifically we will include processes to better characterize the following:

- Source of the blockage (main vs. lateral)
- Cause of the blockage (i.e. roots, grease, pipe damage)
- Magnitude of the back-up (i.e. blockage only, limited back-up, back-up with damage)

Although responsibility for reporting will remain within our Risk Management and Safety Division, appropriate documentation and response procedures will be included as a subset of the Sewer Overflow Response Program.

Furthermore, OCU remains committed to reducing both blockages and back-ups within our gravity sewer collection system. Related to lateral blockages, OCU is focused on two sources of impact: grease and roots. We continue to address grease through the OCU O&GPP. OCU already has a project underway to rehabilitate 70 lateral locations using lining techniques where root issues have been documented. And, over the last two years, we have pilot tested a chemical root control program, albeit with mixed results. Moving forward, OCU will

develop a more formalized lateral maintenance program. The program components will include:

- Desktop analysis to prioritize root target areas based on:
  - VCP area inspection data
  - Back-up claim data
- Root Program
  - Locate laterals near trees and install cleanouts
  - Inspect laterals along with main line CCTV
  - Line/replace laterals with root problems

This program will be documented and administered as part of the CMOM / EMS improvements summarized in Attachment F – Schedule of Planned Actions.

Sewer Overflow Response Program.

OCU has an existing written Sanitary Sewer Overflow Notification and Reporting Program procedure (SOP #FS-ADA-01). The CEI report acknowledges that OCU has a written SORP, but states that "*it is not as formal as a SORP often seen at other utilities and does not include reporting of all SSOs as the EPA defines a SSO.*" Similar to our discussion of written CMOM programs, the County has procedures, job plans, and practices in place that encompass a significant portion of the recommended items to be included in the SORP. OCU acknowledges the value in providing an overall SORP that interconnects the processes that are embedded in a variety of forms and IT systems. Revision of the SORP will address key items identified in the CEI including:

- Reporting procedures and forms;
- Records retention;
- Response and mitigation procedures including management of complex events involving stormwater infrastructure; and
- Building back-up procedures.

While many of the requirements are included in OCU's existing procedure, OCU has initiated a gap assessment comparing EPA's recommendations to OCU's current SORP. The gap assessment will serve as a basis for revising the SORP as discussed in this Response and detailed in Attachment F – Schedule of Planned Actions.

ATTACHMENT E

CMOM PROGRAMS

SYSTEM OPERATION, ASSESSMENT AND REHABILITATION

CONTINUING OPERATIONS, ASSESSMENT, PREVENTATIVE MAINTENANCE, AND REHABILITATION PROGRAMS

OCU conducted its first voluntary CMOM self-audit in 2004 with the support of consultants including EMA, Inc. OCU revisited this work in 2008/2009 again supported by EMA, Inc. Output of these efforts prompted development of assessment, work management and response programs including:

- SSO estimating and reporting procedures;
- Emergency preparedness, response and reporting protocols;
- Standards and construction specifications revisions;
- Operations staging and deployment plans;
- Work order management process improvements; and
- Launch of a comprehensive Renewal and Replacement (R&R) / Infrastructure Rehabilitation Program.

As an outcome of the 2008/2009 CMOM update and SSO reduction project, two of the most significant initiatives focused on infrastructure assessment, maintenance and rehabilitation were launched:

1. Comprehensive Renewal and Replacement (R&R)/ Infrastructure Rehabilitation Program in 2009; and
2. Department reorganization to form the Field Services Organization in 2012.

Forming the Field Services Division was a significant undertaking by OCU and was designed to provide an improved and more concentrated focus on operations and preventative maintenance of OCU's distributed infrastructure. Centralizing these resources provided the following opportunities:

- Created the Field Services Center (FSC) to provide more effective job planning, data management, purchasing, and dispatch support;
- Coupled dedicated gravity cleaning crews with outsourced contracts to significantly increase cleaning and inspection activities. Average CCTV cleaning and inspection rates increased by over 200% for the years 2013 to 2015 as compared to the previous 5 years;
- Restructured pump station operations to create a cleaning route approach, helping to capture grease at pump stations before pumping downstream; and
- Enhanced cross-training of staff to reduce response times of tankers during SSO situations.

These actions represent a continuing effort to provide routine cleaning, assessment, and maintenance of our wastewater collection system. However, OCU's plan also included a significant Infrastructure Rehabilitation / Renewal and Replacement (R&R) Capital Improvement Program (CIP) component as a means to expedite infrastructure improvements and rehabilitation.

Launched in 2009, the goal of this initiative was to develop a proactive, integrated system-wide approach to condition assessment, prioritization, implementation, and construction completion of R&R projects necessary for continued reliability and sustainability of OCU's infrastructure systems. OCU hired Brown & Caldwell engineers to serve as the program manager. The following bullets highlight results that have been achieved since the program was launched:

- Completed assessment of 676 duplex and triplex stations (all of those in service at that time). All stations classified as priority 2, 3, or 4 on a 4-point criticality scale (377 total) placed in the CIP;
- Inspected approximately 50% of the entire gravity system including 92% of the high priority VCP systems;
- Deployed a routine pump station cleaning and grease removal program to prevent transmission of grease and debris into downstream piping systems;
- All gravity pipe (91 miles) with identified rehabilitation needs are in design or construction, or are completed; and
- Completed desktop analysis and targeting of force main priority areas based upon curvilinear alignments believed to contribute to increased break / SSO rates.

These results are the outcome of OCU's concerted effort to provide a comprehensive assessment and maintenance program for our collection system infrastructure that includes both ongoing maintenance and assessment activities through our field services organization as well as infrastructure rehabilitation / R&R initiatives through our CIP program. Each of the key infrastructure areas is further discussed below.

Pump Stations

Orange County owns and maintains 745 pump stations that convey flow from gravity systems, ultimately to the water reclamation facilities. Daily operations of these stations are managed by the Field Services Division, where a staff of 45 full-time equivalents (FTEs) is assigned to pumping operations. The group is further supported by our Water Reclamation SCADA group. Work executed by the Pumping Section, both planned and unplanned, is managed through OCU's Field Service Center and Maximo Work Order system. Work orders and job plans are in place for a majority of the anticipated work activities and serve to manage the work activities conducted by field personnel. The most significant portion of the work conducted by this group includes station visits and cleaning activities, which are prioritized based upon load and range from weekly up to a 7 week cycle, as well

as electrical maintenance on our panel and Supervisory Control and Data Acquisition (SCADA) systems. Example job plans pertinent to pump stations are listed below while a more complete list is presented in Attachment G – Field Services Job Plans:

- Bypass Pump Set-up
- Submersible Pump Check
- Combined Station PM
- Pump Station Start-up Report

These efforts provide effective operations of the pump station network in addition to providing observations and input into the R&R planning work led through OCU's Engineering Division.

As part of the R&R program, detailed inspection and assessment of 676 duplex and triplex stations were performed in 2013, resulting in R&R recommendations at each station. The remaining pump stations are "master" stations that have been rehabilitated within the past 10 years or will be inspected in 2016. The inspection/assessment program resulted in 231 pump stations to be rehabilitated or replaced through capital improvement projects and 146 pump stations to be repaired by OCU Field Services Division maintenance staff. The remaining 299 stations were in sound operating condition and did not require planned rehabilitation at the time of assessment. All identified R&R work is budgeted and scheduled for completion by 2020.

The pump station program moving forward includes detailed pump station inspections every 5 years. However, interim inspections also occur during routine and annual preventative maintenance events at the stations. Observations from those visits are logged in Maximo and prompt more immediate repair and maintenance activities where warranted.

Gravity System

Historically, significant resources were expended in the gravity system for maintenance and repairs. Issues within the gravity system also had the most effect on our customers, therefore, R&R program priorities focused on the gravity system.

The system was divided into subareas based on tributary pump stations and prioritized based on number of trouble calls recorded through dispatch operations and previous maintenance work recorded in Maximo. This focused the program on the older VCP systems which account for approximately 25% of the entire system. Inspections were systematically performed, pipe and manhole conditions assessed, and replacement or rehabilitation recommendations were made. Since inspection activities require the pipe to be clean, this program also serves the purpose of cleaning, as well as inspection and rehabilitation planning.

Since commencement of the gravity program, 92% of the VCP pipe has been inspected and 30% of the PVC systems have also been inspected. OCU is on target with our program goal to inspect and assess the VCP system on a 5-year cycle and the entire system on a 10-year cycle. Initial inspections will continue in the PVC systems over the next 5 years and the VCP sewer areas will be re-inspected as part of this ongoing program. The next cycle of VCP inspections will include a lateral inspection program to address areas with potential building back up risk.

With approximately 50% of the system inspections complete, OCU's R&R program has recommended 90 miles of sewer lining, 1.4 miles of pipe replacement and 678 point repairs. Of these recommended projects, 25 miles of lining have been completed or under construction, 57 miles of lining and all pipe replacement is in final design and 8 miles of lining is in the preliminary design stage. The pipe replacement segments are also either complete or in design. This data reflects that OCU has programmed construction of all lining and replacement work identified through the assessment program. Seventy percent of point repairs have also been completed. All currently identified gravity R&R work is budgeted and scheduled for completion by 2020.

The gravity cleaning, inspection, assessment and rehabilitation program has established standards, workflows and organization structure. Currently, OCU has established timeframe goals of a 5-year cycle for VCP and a 10-year cycle for PVC for this ongoing, repeated process. This approach effectively incorporates problem areas on a more frequent schedule and links with infrastructure rehabilitation planning. OCU believes the substantial increase in proactive cleaning, assessment and maintenance over the last three years is on track to achieve required objectives and will continue to monitor and evaluate results as we move forward with a more formal Management System.

Force Mains

Similar to other utilities, OCU's force main program historically focused on replacing problematic pipe materials (iron and asbestos cement) often subject to corrosion. Since initiating this program, approximately 61 miles of metallic and asbestos cement force main (37% of the total of those pipe materials) have been replaced. In an effort to reduce SSOs associated with metallic pipe corrosion, OCU adopted new construction standards using PVC as the material of choice. Unfortunately, as a result of the change of material standard, OCU experienced abnormal failure rates on PVC force mains due to installation practices (accepted industry practice at the time of installation) that resulted in pipe over-homing (pushed too far into the bell), and over-deflection. The stresses induced on the pipe coupled with cyclic pressures have led to breaks.

As an initial (and ongoing) response to reduce future SSO related to these conditions, OCU, recognizing the deficiencies of industry standard construction practices at that time,

implemented significant changes and continues to update engineering standards and inspection protocols, ensuring that new piping system installations eliminate these deficiencies. This action was critical given the high growth rate of OCU's wastewater collection and transmission system. Several of the measures that OCU deployed include:

- Design for zero deflection;
- Joint inspection to verify that over homing is not present;
- Detailed survey data and deflection tables to detect over-deflection prior to acceptance;
- Increase in pressure rating of pipe; and
- Increased oversight of contractors.

In addition to addressing new piping systems, OCU has also begun replacing PVC force mains where the data available indicates a risk of repetitive failures. A total of 63 miles of PVC pipe have been replaced and an additional 16 miles of PVC pipe are included in the current 5-year CIP as approved for replacement or under construction. All of these PVC piping segments have been replaced well in advance of the pipe's expected useful life expectancy.

As noted at the September 15th meeting, diagnosis and assessment of PVC force main conditions represent a significant challenge since traditional assessment techniques suitable for metallic pipe are not applicable. Therefore, as part of the comprehensive Infrastructure Rehabilitation (R&R) program, OCU retained BC to develop a force main assessment and rehabilitation program to assess and prioritize force main rehabilitation efforts. To date the following tasks have been implemented as part of OCU's force main efforts:

- Aerial crossing inspections;
- Field assessment protocol evaluation;
- Criticality assessment;
- Curvilinear alignment analysis;
- Ultrasonic pilot testing evaluation for metallic pipes;
- High point analysis for metallic pipes; and
- Geospatial and forensic analysis of break data.

OCU is continuing work to establish priorities and replacement criteria for its force main systems. As part of this response, OCU will further accelerate these efforts, including development of a formal Force Main Infrastructure Rehabilitation Program (IRP)/R&R Program that establishes ongoing assessment and rehabilitation priorities, objectives and goals. Timing for the proposed actions is included in Attachment F – Schedule of Planned

Actions. The following illustrates techniques that will be components of the field assessment and rehabilitation program:

- Pressure monitoring of targeted pump station discharges to identify system transients that may contribute to the PVC force main failures. This data will support improved prioritization of ongoing field assessment data;
- Inspection of at-risk pipes;
    - Ultrasonic inspection of metallic pipe;
    - Internal inspections of large pre-stressed concrete cylinder pipe; and
    - Excavation/inspection of targeted critical PVC joints, and inspection of removed joints from pipe replacement projects;
- Forensic program to proactively identify pipes in need of replacement or rehabilitation. Samples will be collected from pipe taps, pipe replacements, repairs break analysis will be performed on pipe failures. Pipe samples will be collected and analyzed from pipe replacement projects to better understand pipe conditions; and
- Bypass / interconnect option development as an alternative to assessment/replacement.

A force main field assessment plan will be developed and guide long term activities for assessing force mains. Findings and rehabilitation plans from the initial phases of assessment, focused on the most critical force main areas, will be compiled as part of the IRP/Force Main Master Plan. These plans will be periodically updated based upon ongoing field assessment activities conducted in accordance with the force main assessment plan.

While not yet formalized into a written force main assessment plan, OCU has already begun these processes and is accelerating an additional 15 miles of PVC force main replacements into the CIP. These projects stem from the first phases of supplemental assessment activities utilizing curvilinear data analysis, break data, and criticality assessment. This action will ensure that rehabilitation projects are moving forward concurrent with ongoing field assessment activities.

ATTACHMENT F
SCHEDULE OF PLANNED ACTIONS

SCHEDULE OF PLANNED ACTIONS.

As discussed herein, OCU is committed to reducing SSOs and has proposed multiple actions to achieve this objective. The CEI Report notes that "*several maintenance procedures the County is utilizing that are in keeping with best management practices*" and "*the County has begun a proactive WCTS assessment and rehabilitation program*". First, OCU will continue the operations, maintenance and rehabilitation programs that are already in place and addressing FOG control, pump station operations and rehabilitation, and gravity sewer system rehabilitation efforts. Building upon these programs, our improvements generally fall within two major program areas: 1) Formalize CMOM Programs and Documentation, and 2) Accelerate Force Main Assessment and Rehabilitation Programs. Each of these areas is discussed below with time tables. For tracking purposes and alignment with annual reporting cycles, OCU intends to track these time frames from January 1, 2016, completing the commitments by the end of 2017.

Also, OCU's continuing assessment and rehabilitation programs, including the accelerated Force Main Assessment and Rehabilitation Program, will identify capital improvement projects. Although OCU cannot predict with any certainty the number, magnitude, and timing of future identified projects, OCU will act quickly upon assessment findings to include projects in the County's CIP. OCU anticipates that most pipeline projects will follow a typical three year project cycle, from design to substantial completion of construction.

<u>CMOM Program Development and Documentation</u>

OCU will implement formalized, ongoing CMOM Program elements as part of an environmental management system (EMS) approach. An EMS provides a structured approach for utilities to manage a full range of activities in order to improve environmental performance, in this case reduction of SSO's and deployment of CMOM needs. Importantly, this approach gives OCU the future ability to broaden the common elements (i.e. document management, audit approaches) of an EMS across all of our operations, providing consistency across OCU's operations. This approach also builds on OCU's existing experience with management systems as part of our partnership with the National Biosolids Management Program.

- **Environmental Management System (24 months)** – OCU will deploy CMOM through an environmental management system approach. The EMS will be operational within 24 months. Critical elements highlighted in EPA's recommendations that will be included in the EMS are discussed below with milestone times, if applicable:

- **Sewer Overflow Response Plan (SORP) (6 Months) –**
  OCU will review and revise the existing plan with a focus on the following:

  - Revising OCU SSO reporting procedures and forms;
  - Reviewing and improving records retention requirements;
  - Modifying existing SSO response plans to provide specific policies and hierarchies for managing and monitoring SSO events;
  - Revising building back-up procedures and data management; and
  - Collaborating with FDEP to improve data integrity throughout the reporting process.

- **CMOM Gap Assessment (9 months)** – OCU will conduct a CMOM gap assessment as part of the EMS development process. This effort will include:
  - Gap analysis to identify needed improvements and missing documentation or program controls;
  - Implementation plan for CMOM and Environmental Management System (EMS):
    - Process/procedure plan;
    - Internal audit plan; and
    - Process training plan.

- **Pump Station Operations and Preventative Maintenance Program (12 months)** – OCU's existing procedures, job plans, pump station assessment manual, and other database sources will be reviewed and updated to document the following:

  - Routine pump station operating procedures;
  - Emergency pump station operating procedures;
  - Condition assessment criteria and data management; and
  - Connections and interaction with the CSSAP.

- **Lateral / Root Program (12 months)** - OCU will formalize and expand the lateral maintenance program, focusing on areas where building back-ups have occurred as well as areas exposed to significant potential for root intrusion.
  - Desktop review and prioritization; and
  - Lateral inspection and maintenance plan.

- **Gravity Line Maintenance Program (18 months)** – OCU's existing procedures, job plans, gravity R&R manual, and other database sources will be reviewed and updated to ensure the following are addressed

  - Routine operating, maintenance, and inspection procedures;
  - Emergency operating procedures including blockage abatement;
  - Condition assessment criteria and data management; and
  - Connections and interaction with the Continuing Sewer System Assessment Program (CSSAP).

- **Continuing Sewer System Assessment Program (CSSAP) (18 months)** – formally document CSSAP priorities, procedures, and objectives. Key elements of the CSSAP will include:
    - System inspection objectives and practices;
    - Inspection techniques and approaches for conducting assessment activities including defect analysis, testing and inspection practices, and capacity/adequacy analysis; and
    - System inspection goals.

- **Infrastructure Rehabilitation Program (24 months)** – formally document infrastructure rehabilitation goals for each major system (gravity, force mains, pump stations, laterals). This program will formalize documentation regarding the existing capital programs that are underway and define priorities for establishing future CIP priorities. Note that formalizing the IRP structure over this time frame will not adversely affect or delay existing projects in the CIP. Key elements of the IRP will include:

    - Procedures for setting priorities and scheduling rehabilitation projects;
    - Procedures for periodic review and validation of the each program;
    - Documentation of project plans and schedules;
    - R&R program status vs. entitlement; and
    - R&R program effectiveness and KPIs.

<u>Force Main Program</u>

OCU is committed to accelerating force main assessment and rehabilitation activities. The following plans for the force main program will be advanced:

- **Force Main Assessment and Rehabilitation Program**
    - **Force main field assessment plan (6 months)**
        - Complete remaining desktop analysis;
        - Formalize field assessment plan, goals, and objectives:
            - Develop and maintain force main replacement and inspection/evaluation priority lists;
            - Forensic data management program and processes;
            - Train inspectors and repair crews on forensic data collection; and
        - Provide ongoing updates to the initial field assessment plan as part of the CSSAP.

- **Field Assessment Program**
  (Launch Upon Plan Completion / On-going / Plan Dependent)
  - Field assessment techniques:
    - Surge pressure monitoring of prioritized PVC force mains to identify potential trends or conditions contributing to failure and expand monitoring to other at risk pipes;
    - Excavation/inspection of targeted critical PVC joints, and inspection of removed joints from pipe replacement projects;
    - Ultrasonic inspection of suspected high points of large diameter metallic pipe; and
    - Internal inspection for pre-stressed concrete cylinder pipe.
  - Prioritize rehabilitation needs for inclusion in the Infrastructure Rehabilitation Plan (Force Main Master Plan).

- **Ongoing and Expanded Rehabilitation Plans**
  - Add 15 miles of PVC force mains identified for replacement to the 5-year CIP based upon recently completed data analysis and risk factors including criticality, curvilinear alignment, installation time period, and break history;
  - The force mains above and new projects identified through the field assessment program will be quickly moved into the CIP and updates documented as part of the IRP/Force Main Master Plan. Typical project delivery cycles of approximately 3 years are expected as noted; and
  - Add dedicated air release valve repair/replacement crew in FY2016.

ATTACHMENT G
FIELD SERVICES JOB PLANS

Collections Job plans								
Job Plan	Description	Revision	Duration	Supervisor	Status	Template Type	Organization	Site
2404	LATERAL RUN ROOT CUTTER	0	2:00		ACTIVE	MAINTENANCE	OCU	UTILITY
2266	INSTALLING BACKWATER VALVE ON LATERAL	1	4:30		ACTIVE	MAINTENANCE	OCU	UTILITY
2278	FORCE MAIN REPAIR / RECLAIMED	1	14:00		ACTIVE	MAINTENANCE	OCU	UTILITY
2159	INSTALL CLEANOUT HAND DIG 1' TO 5'	1	3:00		ACTIVE	MAINTENANCE	OCU	UTILITY
2179	INSTALL CLEANOUT MACHINE DIG 5' TO 10'	1	5:00		ACTIVE	MAINTENANCE	OCU	UTILITY
2190	INSTALL ARV	1	6:00		ACTIVE	MAINTENANCE	OCU	UTILITY
2447	BY-PASS SETUP	1	6:00		ACTIVE	MAINTENANCE	OCU	UTILITY
2698	VALVE REPAIR	1	10:00		ACTIVE	MAINTENANCE	OCU	UTILITY
3300	INSTALLING BACKWATER VALVE ON LATERAL	1	4:30		ACTIVE	MAINTENANCE	OCU	UTILITY
Pumping Job Plans								
Job Plan	Description	Revision	Duration	Supervisor	Status	Template Type	Organization	Site
PN003	SUBMERSIBLE PUMP CHECK	0	0:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
3054	PUMP CHECK OF STATION A, B & HIAWASSEE RD	0	0:15	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS038	FIXED GENERATOR TESTING	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS001	MONTHLY FUEL TANK INSPECTION	2	0:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS002	ANNUAL FUEL TANK INTERSTITIAL TEST INSPECTION	1	0:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS034	CHECK, REPAIR & REPLACEMENT OF FLOATS OR RACK	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS035	PUMP FAILURE PULL FOR REPAIRS	1	6:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS007	GENERATOR BATTERY FAILURE	1	1:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS010	PHASE MONITOR FAILURE	1	0:15	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS012	MOBILE PUMP INSPECTION & TEST RUN	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS013	PUMP INSTALLATION	1	0:45	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS014	GUIDE RAIL OR BRACKET, REPAIR OR REPLACEMENT	1	2:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS016	WATER SERVICE REPAIR	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS017	STARTER FAILURE	1	0:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS056	SCADA INSTALLATION INSPECTION	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS058	STATION EMERGENCY NOTIFICATION SIGN	1	0:15	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS060	LOCAL VISUAL / AUDIBLE ALARM REPAIR	1	0:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS027	INVESTIGATE ODOR COMPLAINT	1	0:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS045	MOBILE GENERATOR INSPECTION & TEST RUN	1	1:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS040	PORTABLE FLOW METER INSTALLATION	1	1:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS019	PUMP STATION START UP REPORT	1	2:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS023	DIALER REPAIR OR REPLACEMENT	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS042	HOA SWITCH FAILURE	1	0:45	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS043	BY-PASS PUMP SET UP	1	4:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS061	TRANSFER SWITCH	1	3:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS047	AUX EQUIP. INSPECTION & TEST RUN	1	1:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS044	PUMP STATION SHUT DOWN	1	8:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS054	WETWELL SLUICE GATE EXERCISING	1	0:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS028	MIX FLUSH VALVE FAILURE	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
2804	FIXED FUEL TANK INSPECTION (AST)	1	0:15	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS024	CIRCUIT BREAKER FAILURE	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS036	B.F.P. INSTALL, REPAIR OR REPLACEMENT	1	1:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS032	DIALER INSTALLATION	1	3:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS015	COMBINED STATION PM	2	3:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS000	PUMP STATION TROUBLE CALL	1	2:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS003	SUBMERSIBLE PUMP CHECK	1	0:30	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS004	SCADA START, RUN, STOP, & FLOAT PUMP FAULT ALARMS	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS005	DEP FUEL TANK COMPLIANCE INSPECTIONS	1	8:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS006	TRANSFORMER FAILURE	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS029	INSPECT AND SERVICE OF CHECK VALVE	1	2:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PS030	GROUNDS EQUIP. INSP. & SERVICE	1	1:00	MRODRIG2	ACTIVE	MAINTENANCE	OCU	UTILITY
PE009	DRAW DOWN TEST	1	8:00	KBEGY	ACTIVE	MAINTENANCE	OCU	UTILITY
CCTV Job Plans								
Job Plan	Description	Revision	Duration	Supervisor	Status	Template Type	Organization	Site
SEALPOINT	POINT DOWN SEAL OF MANHOLE/STRUCTURE (TV)	1	8:00	PMORRISO	ACTIVE	MAINTENANCE	OCU	UTILITY
3329	CCTV GRAVITY PM	2	0:30	PMORRISO	ACTIVE	MAINTENANCE	OCU	UTILITY
2407	CLEANER SUPPORT	1	5:00	PMORRISO	ACTIVE	MAINTENANCE	OCU	UTILITY
3327	JETTER TRUCK GRAVITY PM LINE CLEANING	6	0:45	PMORRISO	ACTIVE	MAINTENANCE	OCU	UTILITY
TV NEW	TV NEW LINES (TV)	1	1:00	PMORRISO	ACTIVE	MAINTENANCE	OCU	UTILITY

ATTACHMENT H
SSO DATA TABLES

	Date	Time	County	District	Incident Time	Description	Incident Location	Spill Amount (in gals)	Source	Service Area
1	3 12 2010	9 04 AM	Orange	CD	3 11 2010	Due to high peak flow (48mgd), the phase 2 filter overflowed to plant lift station. This condition caused the	1620 South Alafaya Trail	20,000	OCUD Eastern	
2	7 15 2010	8 30 AM	Orange	CD	7 14 2010 6 18 PM EDT	Lightning ablew up two fuses (jackson progress energy power line feed into main panel that partially supplied	1621 S Alfaya Trl Orlando	5,000	OCUD Eastern	
3	06 11 13	233p	Orange	CD	6 11 2013 07 00 ET	Orange County Water Reclamation Facility is reporting a spill at the facility of 5,000 gallons. They were able to	1601 Alafaya Trl, Orlando	5,000	OCUD Eastern	
4	5 2 2014	12 21 ET	Orange	CD	5 2 2014 12 21 ET	Orange County Utilities reports a treated effluent spill of a approximately 30,000 gallons. The release was contained	1621 S Alafaya Trail, Orlando	30,000		
5	5 21 2014	08 21 ET	Orange	CD	5 21 2014 05 30 ET	Caller reports 15,000-20,000 gallons of treated effluent release in Orlando at a reclamation facility. Release was	1621 S Alafaya Trail, Orlando	20,000		
6	6 28 2014	16 50 ET	Orange	CD	6 28 2014 15 00 ET	Caller reports a Wastewater Release in Orlando. 1,500 gallons of raw sewage released from a Lift Station due to	1621 South Alafaya Trail, Orlando	1,500	OCUD Eastern	
[redacted]										
10	12 07 13	348a	Orange	CD	12 7 2013 12 51 ET	Hole at base of ARV caused release into ARV pit and field	10000 South Orange Ave	400		
11	12 10 13	725p	Orange	CD	12 10 2013 17 16 ET	Leaking ARV	1329 44th Street	10		
12	12 21 13	1013a	Orange	CD	12 21 2013 10 13 ET	Orange County Utility reported a wastewater spill, estimated 1,000 gallons released. Released contained and	11244 International Drive, Orlando	1,000		
13	12 23 13	338p	Orange	CD	12 23 2013 12 56 ET	ARV leaking into grassy area	2301 Whisper lakes BLVD	100		
14	1 9 2014	759a	Orange	CD	1 9 2014 07 59 ET	Orange County utilities reports a treated effluent release of approximately 1,000 gallons behind 10661 Lazy Lake Drive	10661 Lazy Lake Drive, Orlando	1,000		
15	1 24 2014	15 43 ET	Orange	CD	1 24 2014 09 18 ET	Arv leak on reclaimed line	13100 Balcombe Road City: Orlando	1,000		
16	1 30 2014	22 17 ET	Orange	CD	1 30 2014 15 15 ET	Split in pipe cause overflow	8484 Exchange Ave	500		
17	2 3 2014		Orange	CD	2 3 2014 19 11 ET	ARV leak on reclaimed line	Turkey lake road	332		
18	2 7 2014	17 06 ET	Orange	CD	2 7 2014 16 40 ET	Blockage of inplant collection system caused overflow at manhole	4760 Sand lake Rd Orlando	2,000		
19	3 6 2014	11 37 ET	Orange	CD	3 5 2014 21 45 ET	Manhole overflow at 5801 Shelburn Court	*5801 Shelburn Court*	10		
20	3 25 2014		Orange	CD	3 25 2014 19 13 ET	ARV failure	8323 West Sand Lake Rd	600		
21	4 14 2014	13 50 ET	Orange	CD	4 14 2014 8 15 ET	Damaged ARV	9603 Winter Garden Vineland	100		
22	4 24 2014	14 24 ET	Orange	CD	4 24 2014 14 14 ET	Manhole overflow due to blockage in line	8100 Presidents Drive	300		
23	5 9 2014	9 03 et	orange	CD	5 8 2014 19 30 ET	Contractor hit ARV	1850 W land street	400		
24	5 21 2014	14 52 ET	Orange	CD	5 21 2014 11 02 ET	Caller reports a wastewater release greater than 1,000 gallons in Orlando. The release did not affect stormwater	2470 Americana Blvd, Orlando	122,500		
25	5 29 2014	22 04 ET	Orange	CD	5 29 2014 16 45 ET	Caller reports a release of approximately 1,000 gallons of wastewater in Orlando. No surface waters were affected. It	15553 S Apopka Vineland Road, Orlando	1,000		
26	6 3 2014	16 50 ET	Orange	CD	6 3 2014 13 55 ET	Manhole overflow due to blockage in line	2838 Chaung Cross Wasy	25		
27	6 6 2014	13 55 ET	Orange	CD	6 6 2014 9 12 ET	Force main hit by contractor	2256 Turmeric Ave	200		
28	6 9 2014	14 45 ET	Orange	CD	6 9 2014 9 35 ET	Pipe failure	10633 Golden Cypress Ct	100		
29	6 9 2014	14 59 ET	Orange	CD	06 9 2014 11 00 ET	ARV Leak	5501 Texas Ave	25		
30	6 17 2014	10 55 ET	Orange	CD	6 17 2014 9 19 ET	Manhole overflow due to grease and debris	2391 Crosston Cir	400		
31	7 10 2014	12 22 ET	orange	CD	7 10 14 12 22 ET	manhole overflow due to lift station malfunction	1101 Florida Mall Ave	100		
32	7 13 2014	22 04 ET	Orange	CD	7 13 2014 19 10 ET	Force main break due to pipe failure	10372 Lake Sheen Reserve Boulevard	800		
33	7 19 2014	13 35 ET	Orange	CD	7 19 2014 00 00 ET	Caller reports that 1,000 gallons of raw sewage was released in Orlando due to pump failure. No stormdrains or surface	*1725 Rhode island woods circle*	1,000		
34	8 21 2014	14 33 ET	Orange	CD	8 21 2014 14 06 ET	ARV malfunction caused spill	9800 Satellite Blvd	50		
35	7 30 2014	13 07 ET	Orange	CD	7 22 2014 20 00 ET	In plant manhole overflowed due to EQ basin drain valve being in open position	4760 Sand lake Rd Orlando	100		
36	12 06 13	702P	Orange	CD	12 6 2013 14 06 ET	sand build up in gravity line cause manhole to overflow	15472 Fort Clatsop Crescent	25		
37	12 26 13	936p	Orange	CD	12 26 2013 17 13 ET	sand in line	7126 Beck St	100		
38	1 10 2014	925a	Orange	CD	1 9 2014 12 32 ET	Orange County Utilities reports a Force Main Break and Wastewater Release in Orlando. An unknown amount of	6404 Fiequette Hancock Road, Windermere	unknown		
39	2 11 2014	10 22 ET	Orange	CD	2 11 2014 18 54 ET	SCADA failure after power supply switch	800 N Hastings Dr	800		
40	5 1 2014		Orange	CD	5 1 2014 12 22 ET	Manhole overflow due to blockage in line	2804 Belco Drive	500		
41	5 12 2014	11 53 ET	Orange	CD	5 12 2014 11 53 ET	Manhole overflow due to debris	2804 Belco Drive	800		
42	5 16 2014	14 03 ET	orange	CD	5 21 2014 17 38 ET	Manhole in gravity line	2804 Belco Drive	900		
43	5 20 2014	17 21 ET	orange	CD	5 20 2014	Contractor hit Forcemain	7161 Harbor Heights Cir	300		
44	7 6 2014	14 30 ET	Orange	CD	7 6 2014 11 26 ET	Manhole overflow due to grease and debris	1749 Deanna Dr, Apopka	300		
45	7 28 2014	13 13 ET	Orange	CD	7 28 2014 11 23 ET	Grease blockage in gravity line caused manhole to overflow	1509 North Hadson St	300		
46	8 4 2014	18 25 ET	Orange	CD	8 4 2014 15 36 ET	manhole overflow due to lift station malfunction	*7809 Westminster Abbey Blvd*	200		
47	8 31 2014	2 59 ET	Orange	CD	8 30 2014 21 31 ET	manhole overflow	5120 Silver Star Road	500		
48	5 2 2014	18 50 ET	Orange	CD	5 2 2014 14 45 ET	Caller reports that 10,000 gallons of raw sewage chlorinated effluent wastewater was released in Apopka due to power	701 West McCormic Road, Apopka	10,000		
8	10 23 13	838a	Orange	CD	10 23 2013 08 38 ET	grease blockage caused 300 gallon sso	9211 Rouse Road, Orlando, FL	300	OCUD Eastern	
9	3 10 2014	12 31 ET	Orange	CD	3 10 2014 12 31 ET	A representative with Orange County WP reported that the intersection of W. Lake Butler Road and McKinnon Road	*lat* 28.49332, *Long* -81.57462	500		
49	9 24 2014	10 51 ET	Orange	CD	9 23 2014 18 00 ET	Caller is reporting a wastewater release in Winter Park due to the bottom breaking out from a force main. Caller stated that the wastewater entered a nearby stormdrain	4999 Tangenne Ave., Winter Park	300,000		
50	[redacted]							1,000		

	Address/ Location	5 Day Notification Work Order Number	Date SSO Started	24 Hr Notice - Reported to Fla. DEP email (Date & Time)	Total Overflow (gallons)
1	9645 E. Colonial Drive		12/7/2009		500
2	2300 Econ Cir		1/18/2010		200
3	14282 Acorn Ridge Drive		1/22/2010		900
4	Valencia College Lane & Don Jean Lane		2/1/2010		50
5	Lake Margaret Dr and S. Semoran Blvd		4/2/2010		250
6	9478 Brackin St.		4/2/2010		600
7	Intersection of Peppertree Dr. & Peppercorn Dr.		5/14/2010		60
8	1521 S. Dean Road (PS3665 Berry Dease)		5/26/2010		10,000
9	5118 Darden Avenue		8/4/2010		2,000
10	Across from 15533 Sunflower Trail		8/9/2010		1,200,622
11	10517 Belfry Circle		11/16/2010		5
12	3150 Touraine Ave		12/28/2010		350
13	11850 University Blvd		3/11/2011		400
14	14206 Econ Woods Lane		3/17/2011		250
15	Oak Manor Circle, Valencia Gardens		4/15/2011		75
16	10725 Arbor View Blvd		5/22/2011		500
17	4206 Northern Dancer Way		5/27/2011		150
18	10091 Marsh Pine Cir		6/27/2011		100
19	9328 Dubois Blvd (PS3422)		6/29/2011		5
20	12780 Waterford Lakes Parkway (PS 3929)		7/6/2011		11,966
21	16688 E. Colonial Drive		7/7/2011		150
22	2116 Bonneville Drive		7/8/2011		500
23	Goldenrod Rd & Sun Vista Way		7/13/2011		4,592
24	3960 Benson Park Bd.		7/16/2011		100
25	Golden Isle Blvd & S. Avalon Park Blvd		9/13/2011		70
26	PS3318 Conway Plant @ 3574 Manatee Street		10/9/2011		2,000
27	5690 Royal Pine Boulevard		12/24/2011		500
28	12803 Maribou Drive		12/28/2011		75
29	7624 Cidro Court		2/9/2012		500
30	7350 Lake Underhill Road		3/20/2012		150
31	Dean Rd & Flowers Ave		4/6/2012		250
32	12780 Waterford Lakes Parkway		9/14/2012		1,000
33	13700 Narcoossee Road		10/16/2012		500
34	8308 Port Said St		10/18/2012		500
35	8362 Kelsall Dr		12/26/2012		100
36	701 McLean Road		2/7/2013		700
37	Golfway Blvd (Eastwood)		2/25/2013		500
38	PS3318 @ 3574 Manatee Street		3/24/2013		5,000
39	12780 Waterford Lakes Pkwy		4/30/2013		600
40	14933 Golden Sunburst Avenue		5/20/2013		100
41	E. Colonial Dr & Econ Trl.		5/23/2013		400
42	Valencia College Ln (valve # 3422A004)		6/26/2013		50
43	654 Econlockhatchee Trl		11/15/2013		500
44	Spoonbill Ave. & Duck Ct. (Manhole Overflow)		1/24/2014		50

BLANK PAGE

#13

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

CERTIFIED MAIL 7014 2870 0000 3318 2664 JUL 23 2015
RETURN RECEIPT REQUESTED

Orange County
Attn: Mr. Larry Tunnell
Manager, Utilities Water Reclamation Division
9150 Curry Ford Road
Orlando, Florida 32825

Re: Notice of Violation and Opportunity to Show Cause
National Pollutant Discharge Elimination System Permit No.: FL0038849
Orange County East Service Area Wastewater Treatment Plant

Dear Mr. Tunnell:

The purpose of this letter is to advise Orange County (County) that the United States Environmental Protection Agency Region 4 has reviewed information submitted by the County to the EPA on October 28, 2014, in response to the EPA's information request letter issued pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318. In addition, on March 2-3, 2015, the EPA and the Florida Department of Environmental Protection conducted a Compliance Evaluation Inspection (CEI) of the County's Wastewater Collection and Transmission System (WCTS). The County subsequently submitted examples of building backups and other sewer complaints via email on March 3, 2015. A copy of the CEI report is enclosed.

Based upon review of the information submitted and the CEI, the EPA has determined that the County has violated the CWA and its National Pollutant Discharge Elimination System (NPDES) permit as follows:

> During the period of September 1, 2009, through September 30, 2014, the County had at least eighty-seven (87) Sanitary Sewer Overflows (SSOs) totaling at least 4,144,851 gallons of untreated sewage that discharged from the County's WCTS to navigable waters of the United States as defined by Section 502 of the CWA, 33 U.S.C. § 1362. Such SSOs were not authorized by the NPDES permit and are therefore violations of Section 301(a) of the CWA, 33 U.S.C. § 1311(a). In addition, the County had at least an additional 117 SSOs totaling at least 586,756 gallons of untreated sewage that was released from the WCTS and that did not reach navigable waters of the United States. All 204 SSOs are indicative of the County's violation of Section IX.7. of the County's NPDES Permit No.: FL0038849, which requires the County to properly operate and maintain its facility, systems of treatment and control, and related appurtenances. In addition, it appears the County has violated Sections VIII.4. (Section VIII.7. in the previous NPDES permit that expired July 28, 2014) and/or IX.20. of the County's NPDES permit by failing to report at least 44 SSOs to the State of Florida and/or violated Section 308 of the CWA by failing to report at least 50 SSOs to the EPA in response to the EPA information request, issued pursuant to Section 308 of the CWA, 33 U.S.C. § 1318.

Until compliance with the CWA is achieved, the County is considered to be in violation of the CWA and subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

Therefore, the EPA requests that representatives of the County contact the EPA within seven business days of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against the County for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. The County should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial information, which may reflect an inability to pay a penalty. The County has the right to be represented by legal counsel.

Please be aware that the EPA may use information provided during the meeting or telephone conference in any enforcement proceeding related to this matter. Failure to schedule a show cause meeting may result in a unilateral enforcement action against the County. Notwithstanding the scheduling of a show cause meeting, the EPA retains the right to bring further enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

If you have any questions regarding this Notice of Violation or would like to arrange a show cause meeting, please contact Mr. Brad Ammons, of my staff, at (404) 562-9769 or by email at ammons.brad@epa.gov. Legal inquiries should be directed to Mr. Bill Bush, Associate Regional Counsel, at (404) 562-9538.

Sincerely,

James D. Giattina
Director
Water Protection Division

cc: Ms. Jessica Kleinfelter
Florida Department of Environmental Protection

Ms. Jenny Farrell
Florida Department of Environmental Protection, Orlando

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4
Water Protection Division
NPDES Permitting & Enforcement Branch

COMPLIANCE EVALUATION INSPECTION REPORT

Orange County Public Utilities Department
Orange County
Florida
NPDES Permit No. FL0038849

Facility Address:
1621 South Alafaya Trail
Orlando, Florida 32828

Inspection Dates:
March 2-3, 2015

Inspectors:
Brad Ammons, Enforcement Officer, EPA Region 4
Sara Janovitz, Enforcement Officer, EPA Region 4
Jenny Farrell, Environmental Specialist II, FDEP
David Smicherko, Environmental Consultant, FDEP

Inspection Report Prepared by:
Brad Ammons, EPA Region 4

July 2, 2015

TABLE OF CONTENTS

Contents

I. OVERVIEW 1
II. OBJECTIVES 1
III. INVESTIGATION METHODS 1
IV. REGULATORY SUMMARY 2
V. INSPECTION SUMMARY AND FINDINGS 2
A. Analysis of SSOs 2
B. Management Interview 3
C. Site Inspection 3
VI. Recommendations and Conclusion 8
A. Recommendations 8
a. Root Control Program 9
b. FOG Control Program 9
c. Operations, Preventive Maintenance, Assessment and Rehabilitation Programs 10
d. Sewer Overflow Response Plan (SORP) 13
B. Conclusion 16

ABBREVIATIONS AND ACRONYMS

CEI	Compliance Enforcement Inspection
CMOM	Capacity, Management, Operation, and Maintenance
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	United States Environmental Protection Agency
FDEP	Florida Department of Environmental Protection
FOG	Fats Oils and Grease
GIS	Geographic Information System
GPM	Gallons per Minute
I/I	Infiltration and Inflow
ICIS	Integrated Compliance Information System
MGD	Million Gallons per Day
MOM	Management, Operation, and Maintenance
NPDES	National Pollutant Discharge Elimination System
POTW	Publicly Owned Treatment Works
PS	Pump Station
RDII	Rain Derived Infiltration and Inflow
SORP	Sewer Overflow Response Plan
SSES	Sanitary Sewer Evaluation Survey
SSO	Sanitary Sewer Overflow
WCTS	Wastewater Collection and Transmission System
WWTP	Wastewater Treatment Plant

I. OVERVIEW

Orange County's (the County) Public Utilities Department provides sanitary sewer services to an unknown number of residential customer accounts in Orange County, Florida. The County's East Service Area Wastewater Treatment Plant (WWTP) serves as the regional WWTP for 7 or 8 municipalities or utilities including, but no limited to:

- Portions of the City of Orlando;
- Portions of the Reedy Creek Improvement District;
- Unincorporated portions of Orange County;
- Other cities/utilities within the County.

The County is responsible for approximately 737 miles of gravity sewer and force main, 319 Pump Stations (PS) and the Eastern Service Area WWTP with a design flow of 19 Million Gallons per day (MGD) and an average daily flow of 18.16 MGD. The Eastern Service Area WWTP serves approximately 120,000 people.

The EPA and Florida Department of Environmental Protection (FDEP) conducted a Compliance Evaluation Inspection (CEI) of the County's wastewater collection and transmission system (WCTS) on March 2-3, 2015. The purpose of this CEI was to evaluate compliance with the Clean Water Act (CWA) as it relates to Sanitary Sewer Overflows (SSOs) from the WCTS and to assess the County's MOM programs. Additionally, this CEI was intended to examine the causes and potential corrective actions for SSOs from the WCTS.

During the inspection, the EPA requested written documentation of any MOM programs that the County may use to operate and maintain its WCTS. The EPA also discussed inspection and maintenance records, interviewed management personnel and visited various sites in the WCTS, including PS numbers 3312 (Waterford Lakes), 3665 (Barry Dease), 3318, 3178 and 3100 (Sadler Elementary). This report describes the EPA's findings, identifies areas that need to be addressed and presents preliminary recommendations.

II. OBJECTIVES

The specific objectives of the CEI were to assess the County's compliance with the CWA, evaluate reported SSOs, assess the County's MOM programs, where implemented, and to examine the causes of SSOs in the WCTS.

III. INVESTIGATION METHODS

The investigation included:

- Review of the Integrated Compliance Information System - National Pollutant Discharge Elimination System (ICIS-NPDES) federal database and state documents;
- Review of the NPDES permit and related documents;
- Review County's proposed SSO corrective projects, if any;
- Interviews with the County's Public Utilities Department personnel; and,
- Visual inspection.

IV. REGULATORY SUMMARY

The FDEP is authorized under the CWA to implement the NPDES program in the State of Florida. As a part of this implementation, FDEP provides oversight of the efficacy of operation and maintenance of the WCTS associated with all NPDES permits. The East Side Area WWTP operated by the County is authorized by FDEP under NPDES permit No. FL0038849 to discharge treated effluent through a wetland system into the Econlockhatchee River. The NPDES permit was issued on October 24, 2014 and expires on October 23, 2019 ("existing permit") and the previous NPDES permit was issued on July 29, 2009 and expired on July 28, 2014 ("previous permit").

SSOs that impact waters of the U.S. are prohibited based on Sections 301 and 402 of the CWA which generally prohibits the discharge of pollutants by any person unless authorized by an NPDES permit. Section IX.5. of the existing and previous permits requires the permittee to take all reasonable steps to minimize or prevent any discharge, reuse of reclaimed water, or residuals use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment. Sections VIII.4. of the existing permit (Section VIII.7. of the previous permit) and IX.20. of both permits require the permittee to report unauthorized discharges which have a reasonable likelihood of adversely affecting human health or the environment to FDEP. Section IX.7. of both permits requires that the permittee shall at all times properly operate and maintain the facility and systems of treatment and control and related appurtenances that are installed and used by the permittee to achieve compliance with the conditions of the permit. The WCTS is included in the "related appurtenances" that the NPDES permit mentions.

V. INSPECTION SUMMARY AND FINDINGS

The EPA performed a pre-inspection evaluation and an on-site CEI of the County's WCTS. The pre-inspection evaluation of the County's WCTS consisted of examining records submitted by the facility to FDEP and/or the EPA as well as a review of the information the County submitted in response to the EPA's CWA Section 308 information request. This section will provide a summary of both means of evaluation as well as any recommendations to the County to improve the WCTS performance.

A. Analysis of SSOs

Discharges to waters of the United States from sanitary sewer systems are prohibited unless authorized by an NPDES permit. In addition, overflows from the sewer system that do not reach waters of the United States can be indicative of a failure to comply with the proper operation and maintenance provisions of Section IX.7. of both the existing and previous permits.

The County owns and operates the East Service Area WWTP that treats some of the wastewater produced in the eastern unincorporated portions of Orange County as well as portions of 7 or 8 other municipalities or utilities. A close look at the SSO data submitted to FDEP by the County revealed discrepancies in the number and volume of the SSOs reported in the County's response to the EPA's information request. Specifically, between September 1, 2009 and September 30, 2014, FDEP has record of 50 SSOs that were reported by Orange County but were not in the County's response to the EPA's information request. In addition, during that same timeframe, there appears to be 44 SSOs

that were reported to the EPA but are not in the FDEP's SSO database. Most of these 44 SSOs appear to have been reported to FDEP, but may not have been entered into FDEP's SSO database.

The County has experienced 8 SSOs of 100,000 gallons or more and an additional 28 SSOs between 10,000 and 100,000 gallons each between September 1, 2009 and September 30, 2014. The County's SSOs amount to an annual average of just over 5.5 SSOs per year per 100 miles of sewer. However, none of the SSO numbers above include building backups caused by flow conditions in the County's WCTS.

B. Management Interview

The EPA and FDEP met with representatives of the County on March 2-3, 2015, at the County's Utilities Administration building. Topics of discussion during the meeting included the use and documentation of any MOM programs including Building backups, capacity limited portions of the WCTS, WCTS mapping, Inter-Jurisdictional Agreements, Fats, Oil, and Grease (FOG) Control, Root Control, Preventive Maintenance and Inspections, Pump Station Back-up Power, Infiltration/Inflow reduction, the County's Pretreatment program, water quality monitoring for SSO impacts and reporting procedures. The EPA discussed concerns relating to the large SSOs listed above with the representatives and inquired about each program listed above to determine whether a formal or non-formal (not in writing) program existed to manage various maintenance and operations needs of the WCTS. The County's management told the EPA that the only formal, written MOM Programs they have are the Sewer Overflow Response Plan (a draft was provided in the response to the §308 information request letter) and a Training Program.

A review of the SSO data submitted to FDEP, the CWA Section 308 response submitted, combined with this CEI, forms the basis for the recommendations and conclusion outlined in this report. In general, the County has a few written operating procedures for some of the MOM programs that the EPA recommends, however, improvements are needed in several program areas. Specifically, the County is doing a lot of the work suggested under the individual MOM Programs, but does not have them in formal written form.

C. Site Inspection

The EPA performed an on-site inspection of various points in the WCTS. Several sites were chosen based on the status of upgrades to the pump station that was visited. The EPA and FDEP inspected the following pump stations: (1) pump station #3312 (Waterford Lakes); (2) pump station #3665 (Barry Dease); (3) pump station #3318 (former package plant); (4) pump station #3178, (5) pump station #3100 (Sadler Elementary School) and (6) pump station #3499.

Specifically, the Waterford Lakes pump station (#3312) was visited due to a complaint received by the EPA, as well as several news articles about a SSO from that area. In addition, the Barry Dease pump station (#3665) experienced three (3) SSOs due to power failure (transfer switch failed), I/I and failure of the on-site backup generator. The other 4 pump stations were chosen by the County to show recently upgraded stations within the WCTS.

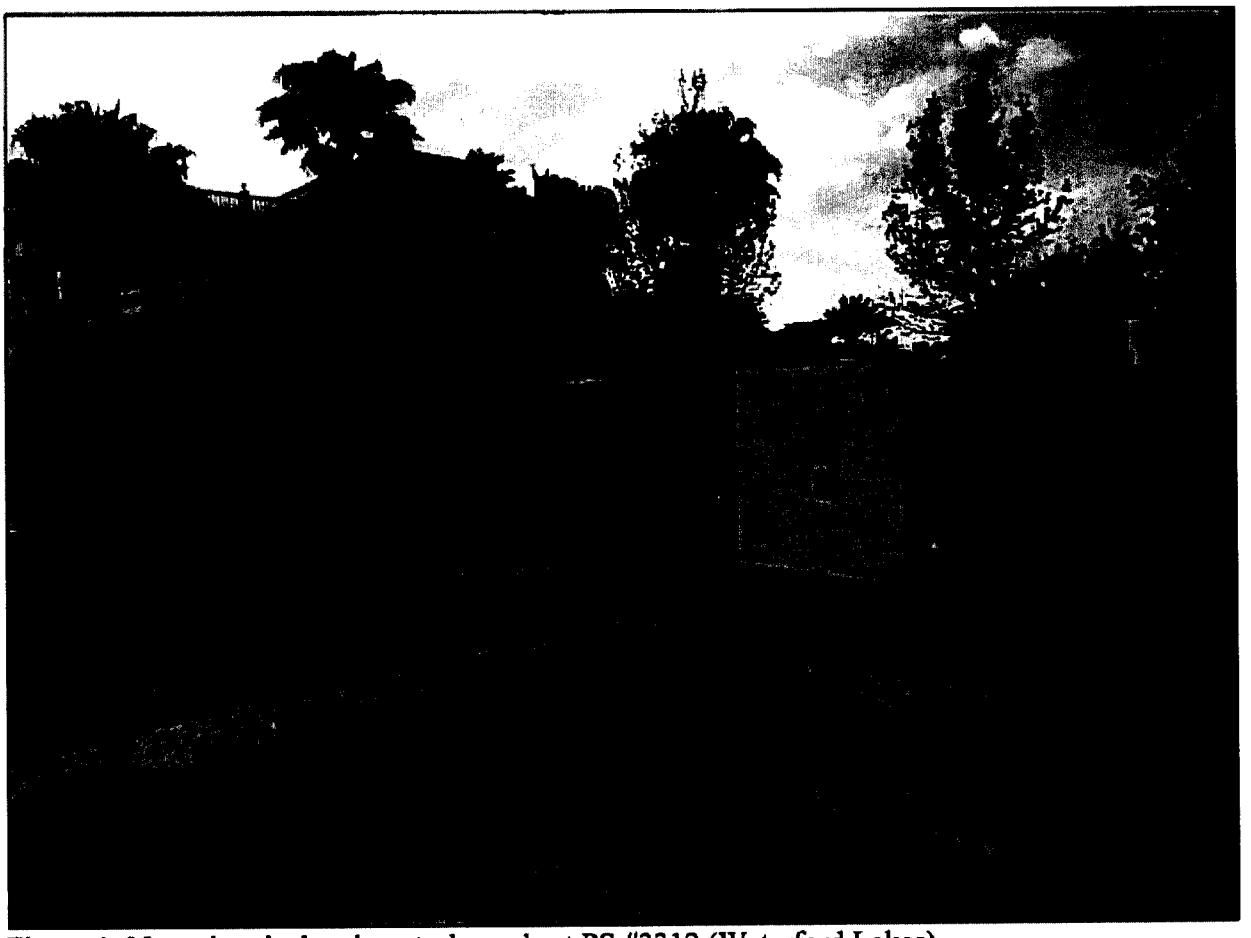


Figure 1: New electrical and control panels at PS #3312 (Waterford Lakes).

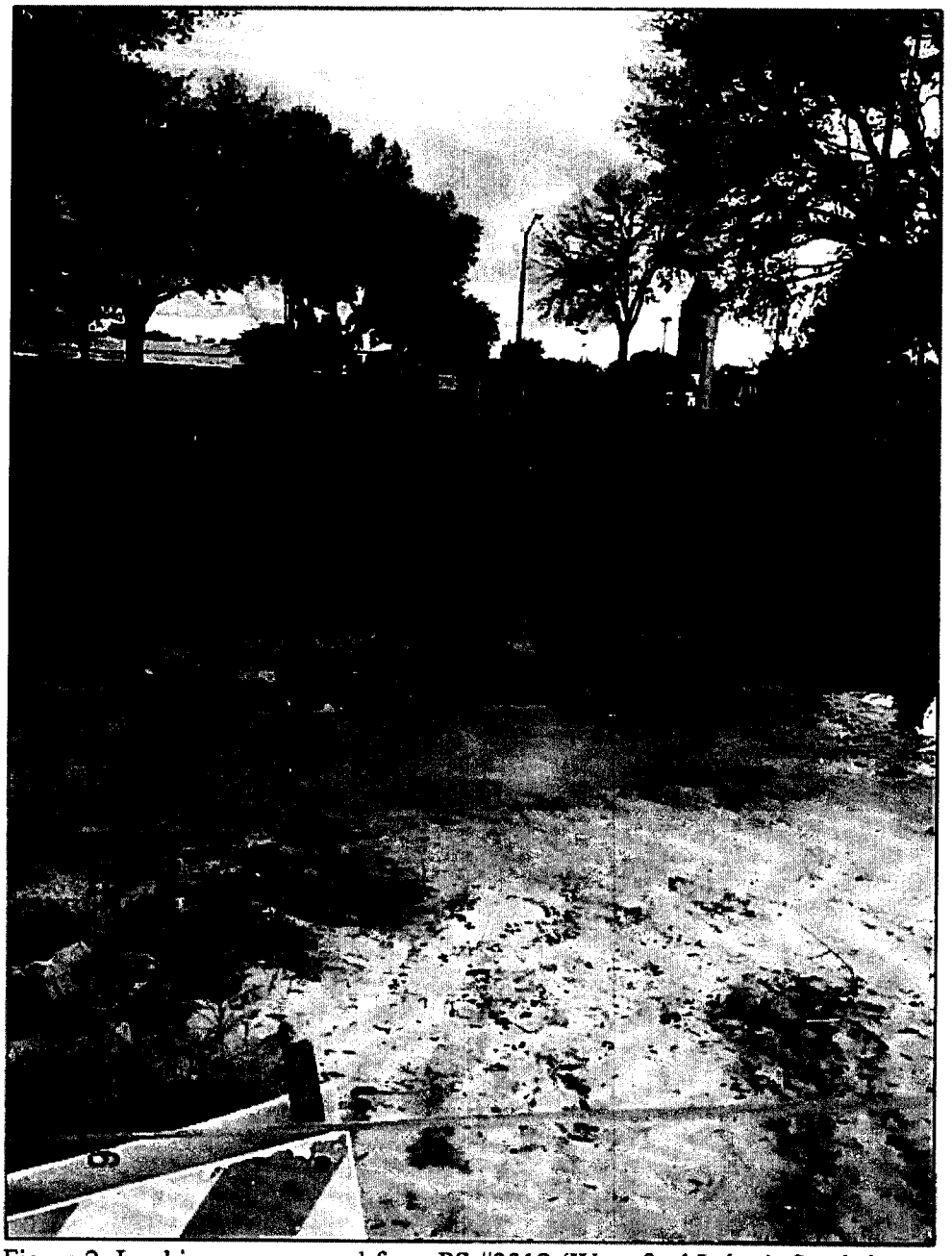


Figure 2: Looking across canal from PS #3312 (Waterford Lakes). Sand shows where incoming gravity line collapsed (upstream manhole is in median of Lake Underhill Road in background) causing SSO in Waterford Lakes subdivision.

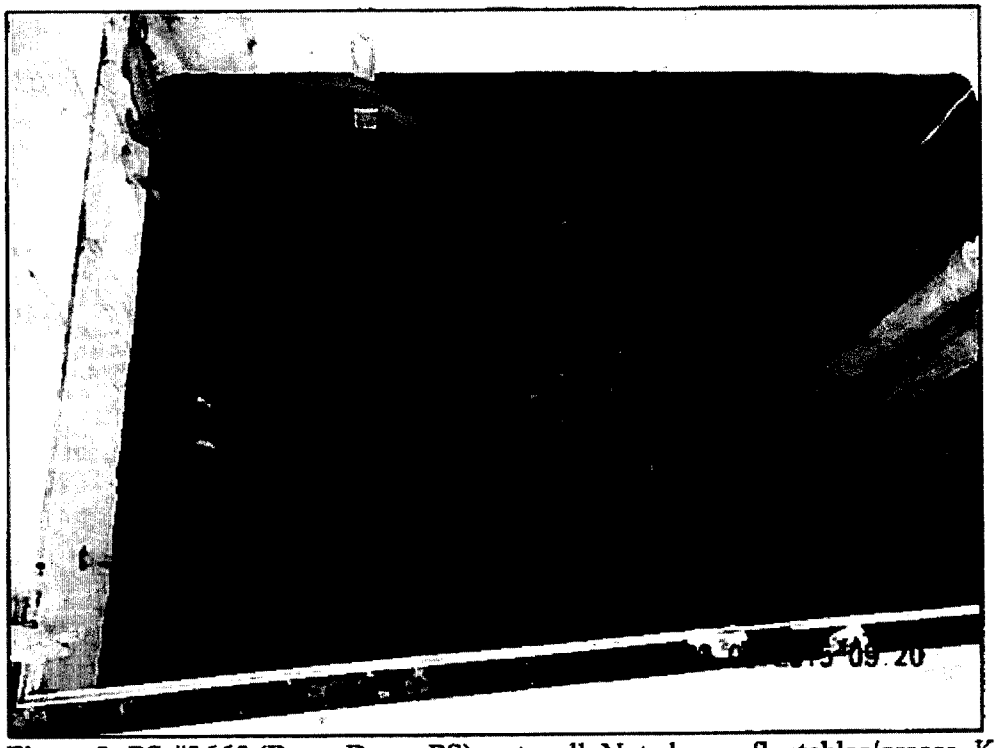


Figure 3: PS #3665 (Barry Dease PS) wet well. Note heavy floatables/grease. Kevin Bagy (Orange County employee) told the EPA that the County cleans this wet well every 2 weeks and PS operates by pressure transducer, not floats.

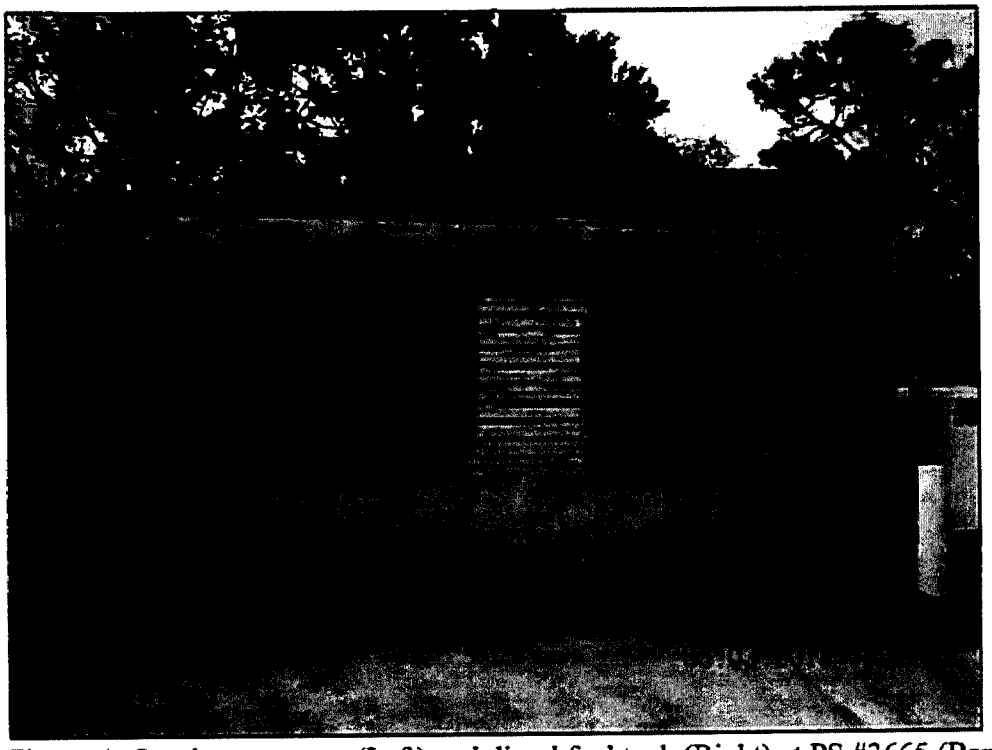


Figure 4: On-site generator (Left) and diesel fuel tank (Right) at PS #3665 (Barry Dease PS).

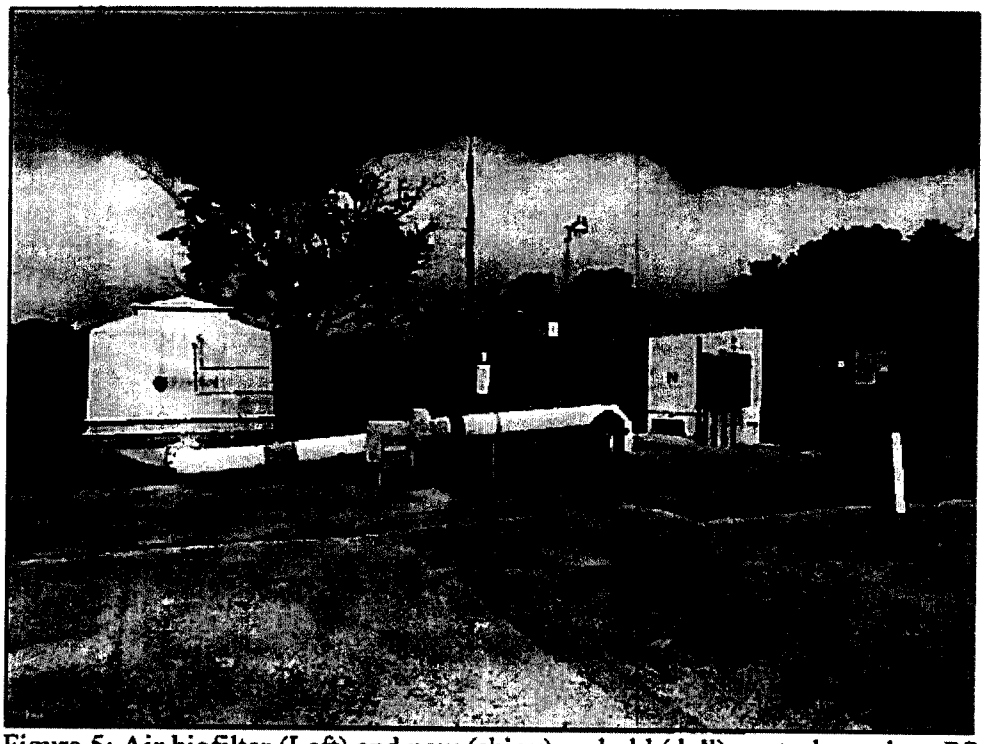
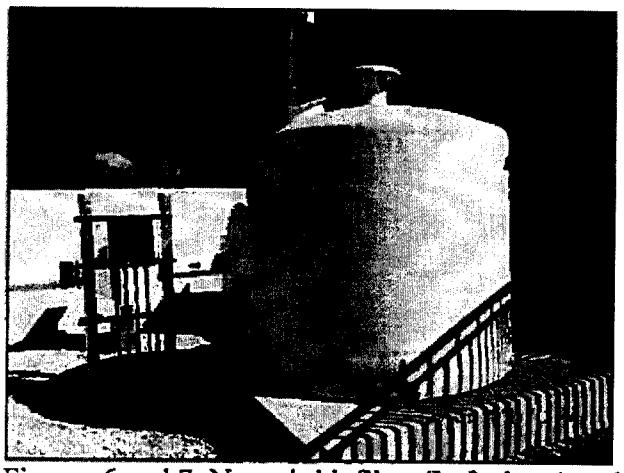
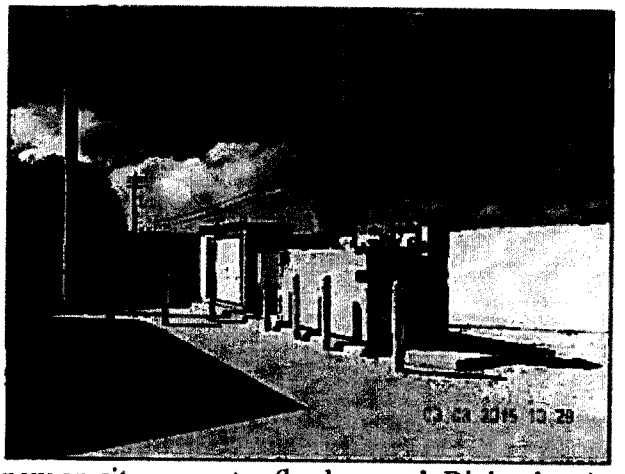
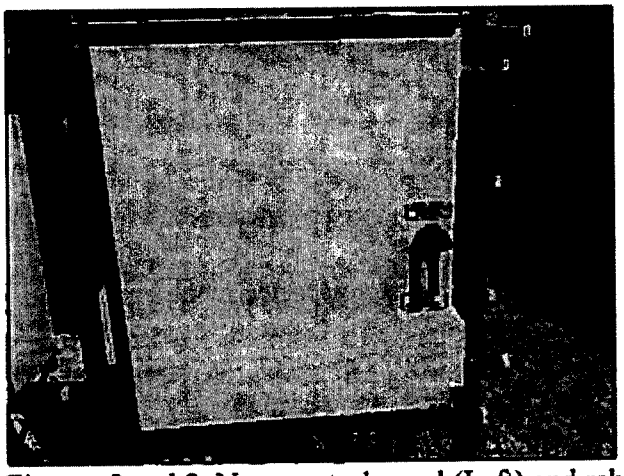


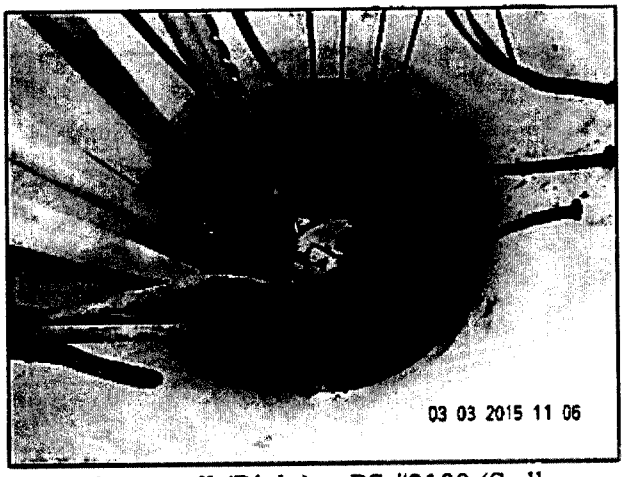
Figure 5: Air biofilter (Left) and new (shiny) and old (dull) control panels at PS #3318 (former package plant that was taken offline).



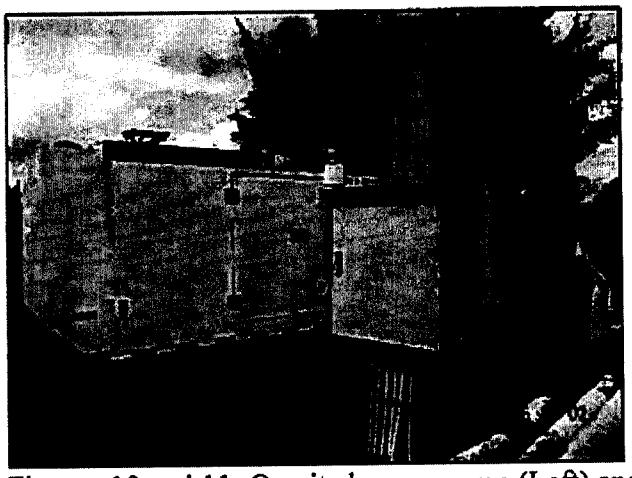


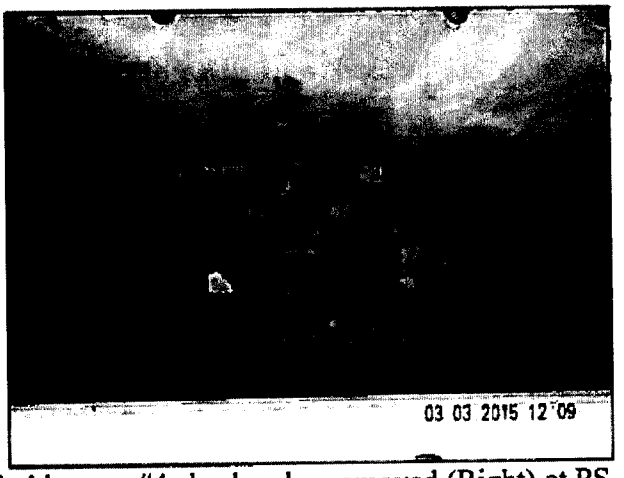
Figures 6 and 7: New air biofilter (Left photo) and new on-site generator (background, Right photo) and diesel fuel tank (foreground, Right photo) at PS #3178. This is a newly upgraded PS which also included upgrade to Variable Frequency Drives, soft start control and new transfer switch.





Figures 8 and 9: New control panel (Left) and rehabilitated wet well (Right) at PS #3100 (Sadler Elementary School PS). This PS was rehabilitated by a County contractor.





Figures 10 and 11: On-site bypass pump (Left) and old pump #4 check valve removed (Right) at PS #3499. The bypass pump was installed because pump #4 was removed due to non-functioning check valve. This PS's rehabilitation was in the design phase during this CEI.

VI. Recommendations and Conclusion

A. Recommendations

The EPA noted several preventive maintenance procedures the County is utilizing that are in keeping with best management practices to operate and maintain the system; however, the EPA recommends that County develop formal written programs (or expand if formal, written programs have already been developed) for these preventive maintenance procedures and programs. Developing formal written programs will aid in refining these programs, which should increase efficiency of the programs and provide guidance for the implementation of these programs that can be passed down to the next maintenance generation. Specifically, the County has already begun implementing a WCTS-wide assessment and rehabilitation program and has begun upgrading the County's sewer pump stations, as noted above.

MOM program development guidance documents can be found on EPA, Region 4's website at http://www.epa.gov/region4/water/wpeb/momproject/.

Recommended MOM programs include, but are not limited to:

a. Root Control Program

The County noted that roots are a problem in the service laterals, often at the connection between the County's WCTS and the building (private) lateral. From the information provided by the County via email after the CEI, the County has experienced approximately 62 building backup SSOs due to roots in the public laterals and mainlines between January 2014 and February 2015.

The EPA recommends that the County develop and implement a formal Root Control Program. The Root Control Program should include documents that outline procedures and provide guidance on how to manage and reduce root growth and intrusion into the WCTS. In developing this program, the County should consider the various best practices currently being used to manage root intrusion.

b. FOG Control Program

In general, there was very little noticeable FOG in the pump station wet wells of the pump stations visited by the EPA and FDEP during this CEI except for the Barry Dease pump station. However, in the building backup information provided after the inspection, at least 6 building backups were attributed to grease. Specifically, the County should focus on the public education aspect of the FOG Control Program below to prevent future building backup SSOs due to grease.

The EPA recommends that the County develop and implement a formal FOG Control Program. The FOG Control Program should include, but not be limited to, the following criteria:

i. The legal authority to control the discharge of FOG into the WCTS, including the ability to implement a permit and enforcement program.

ii. Specification of accepted devices to control the discharge of FOG into the WCTS.

iii. Establishment of standards for the design and construction of FOG control devices including standards for capacity and accessibility, site map, design documents, and as-built drawings.

iv. Establishment of FOG control device management, operations, and maintenance standards, or best management practices, that address onsite record keeping requirements, cleaning frequency, cleaning standards, use of additives, and ultimate disposal.

v. Establishment of construction inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements, to assure that FOG

control devices are constructed in accordance with established design and construction standards.

vi. Establishment of compliance inspection protocols, including scheduling, inspection report forms, and inspection record keeping requirements to assure that FOG control devices are being managed, operated, and maintained in accordance with the established management, operations, and maintenance standards or best management practices.

vii. Establishment of a FOG disposal manifest system.

viii. Establishment of an enforcement program, including specific enforcement mechanisms, to ensure compliance with the FOG Control Program.

ix. Establishment of a compliance assistance program to facilitate training of FOG generators and their employees.

x. Establishment of a public education program directed at reducing the amount of FOG entering the WCTS from private residences.

xi. Establishment of staffing (technical and legal) and equipment requirements to ensure effective implementation of the FOG Control Program.

xii. A FOG characterization study that shall identify the sources of FOG causing problems in the WCTS and the best method or mechanism for addressing those sources.

xiii. A list of current commercial establishment FOG generators including a description of their FOG generating processes and average daily discharge volume.

xiv. Establishment of performance indicators to be used by the County to measure the effectiveness of the FOG Control Program.

c. Operations, Preventive Maintenance, Assessment and Rehabilitation Programs

The County has begun a proactive WCTS assessment and rehabilitation program. County staff and contractors told the EPA that the County has assessed (using NASSCO PACP data standards) approximately 79% of the County's vitrified clay sewers (259 out of 328 miles) and approximately 26% of the County's PVC sewers (227 out of 885 miles). In addition, the County told the EPA that is has inspected and rated all 660 County duplex pump stations and that those pump stations with a rating of 3 or 4 (out of 4) have been placed in the capital improvement project (CIP) budget. Finally, the County mentioned that it has conducted a desktop analysis of all ductile iron and pre-stressed concrete cylinder pipe force mains to look for potential corrosion issues and have inspected all PVC force mains 14" and larger for curve alignment issues. Any force main defects are also being placed into the County's CIP budget. Given the number of large volume SSOs due to force main ruptures, the County should consider a more in-depth assessment of all force mains, including those constructed of PVC.

The EPA recommends that the County develop and implement formal written MOM Programs with an aggressive Preventive Maintenance and Inspection Program that defines goals for cleaning and inspection activities and pump station preventive maintenance activity, including:

A **Gravity Line Preventive Maintenance Program**. The County has a schedule goal for cleaning the WCTS which is once every 5 years for vitrified clay sewers and once every 10 years for PVC sewers. However, according to the County's building backup data provided via email after this CEI, it appears that a lot of the gravity line sewer cleaning the County conducts is in a reactive mode. In addition, the County's work orders provided at least 32 occurrences of a broken sewer line, often the wye at the connection between the County's lateral and the building (private) lateral.

Therefore, the EPA recommends that the County develop and implement a formal Gravity Line Preventive Maintenance Program. The Gravity Line Preventive Maintenance Program should include the following components: 1) blockage abatement mechanisms (including both hydraulic and mechanical cleaning), 2) root control mechanisms (including hydraulic and mechanical cleaning, as well as consideration of the use of chemical root control agents), 3) debris control mechanisms, and 4) manhole preventive maintenance procedures. This program should include the following activities: 1) identification of, and provision for, all personnel and equipment needed, 2) determination of the frequency, 3) establishment of procedures, 4) establishment of priorities for scheduling, 5) the use of standard forms, 6) establishment of record keeping requirements, 7) establishment of performance measures, and 8) integration of all data collected under the program with other information management systems.

A **Continuing Sewer System Assessment Program**. The County verbally described which areas of the WCTS have already been assessed for rehabilitation or replacement needs as well as how much of the WCTS had already been assessed as described above. In addition, the County stated it has a goal to CCTV its vitrified clay sewers every 5 years and its PVC sewer every 10 years. The County has made a lot of progress in assessing the gravity sewers in the County's WCTS in recent years and has a general plan for continuing its assessment program. However, there was no formal written Continuing Sewer System Assessment Program (CSSAP) document provided or shown to the EPA.

Therefore, the EPA recommends that the County develop and implement a formal CSSAP. The CSSAP should establish procedures for setting priorities and schedules for undertaking the WCTS assessment including: 1) corrosion defect identification, 2) routine manhole inspections, 3) flow monitoring, 4) CCTV activities, 5) gravity system defect analysis, 6) smoke testing, 7) force main defect analysis, and 8) pump station performance and adequacy analysis. The CSSAP should provide for the assessment of at least ten percent (10%) of the WCTS on average per year and establish priorities and schedules taking into consideration the nature and extent of customer complaints; flow monitoring; location and cause of SSOs and WCTS deficiencies; any remediation work already ongoing; pump station run times and/or pressures; field crew work orders; any

preliminary sewer assessments, such as flow monitoring results; community input; and any other relevant information.

An **Infrastructure Rehabilitation Program**. The County told the EPA that any defects found during the assessment work is placed in its CIP budget for rehabilitation. However, a goal or timeline for rehabilitating the entire WCTS was not discussed. The County has made a lot of progress in rehabilitating the WCTS in recent years and has a general plan for continuing its rehabilitation/replacement program through its CIP budgeting process. The County mentioned it averages an $80-100 million CIP budget per year, but the EPA assumes this is for both water and sewer. However, there was no formal written Infrastructure Rehabilitation Program (IRP) document provided or shown to the EPA. In addition, given the very large SSOs attributed to force main ruptures, the County should include rehabilitation of all assessed force mains within the County's WCTS.

Therefore, the EPA recommends that the County develop and implement a formal IRP. The IRP should establish procedures for setting priorities and schedules for undertaking rehabilitation of the WCTS. The IRP should address Infiltration/Inflow (I/I), structural issues in the WCTS, and the other conditions causing SSOs, with the goal of eliminating future SSOs. The IRP should take into account all previous information the County has gathered including any information gathered pursuant to the CSSAP. The IRP should also establish standard procedures to analyze the effectiveness of completed rehabilitation projects.

A **Pump Station Operations and Preventive Maintenance Program**. County management stated that the County's pump stations are inspected on a once per day to once per 2 month schedule, depending on the size and criticality of the pump station. Most of the County's pump stations are monitored remotely via Supervisory Control and Data Acquisition (SCADA) systems (all but 50 pump stations). Eighteen (18) of the County's pump stations have on-site backup generators and the County owns 72 portable generators in case of power loss at a County sewer pump station. However, there was no formal written Pump Station Operations and Preventive Maintenance Program (PSOPMP) document provided or shown to the EPA.

Therefore, the EPA recommends that the County develop and implement a formal PSOPMP. The PSOPMP should include or address the following items/components described below:

i. Pump station operations at pump stations that are to be conducted on a routine, scheduled basis. The program should define the standard pump station operating procedures to be followed at each pump station such as reading and recording information from the elapsed time meters, recording information from the pump start counters, observing wet well conditions and grease accumulation, checking and re-setting, as necessary to improve system performance, wet well set points, checking and recording system pressure, checking SCADA (or equivalent system) components, checking alarms and stand-by power and identifying maintenance needs.

ii. Emergency pump station operations procedures. The program should address pump station operations at pump stations that are to be conducted as a result of equipment failure or loss of electrical power. The program should define the emergency pump station operating procedures to be followed at each pump station such as calling for emergency maintenance, initiating stand-by power by bringing in portable generators or initiating portable pump operations for pump around.

iii. The program should establish schedules, routes, priorities, standard forms and reporting procedures and establish minimum acceptable performance measures and condition grading criteria.

Preventive Maintenance and Inspection Programs can have a significant positive impact on the future condition of the County's WCTS. A properly implemented Preventive Maintenance, Inspection and Rehabilitation Program may prevent a massive outlay of expenses needed to repair or replace parts of the WCTS that County personnel 'did not see' failing due to the lack of prevention. Relatively small preventive maintenance expenses now can save the County larger repair or capital expenses in the future.

d. Sewer Overflow Response Plan (SORP)

The County has a written SOP for reporting SSOs to FDEP. However, it is not as formal as a SORP often seen at other utilities and does not include reporting of all SSOs as the EPA defines a SSO. According to the County's response to the information request letter and SSO data from FDEP submitted to the EPA, it appears that the County has experienced over 40 SSOs that was not reported to the FDEP. In addition, there appears to be numerous building backup SSOs that were not reported to either FDEP or the EPA.

Therefore, the EPA recommends that the County revise and/or expand its SSO reporting SOP provided in the information request response using the guidelines provided below that will establish timely and effective methods and means of responding to, cleaning up, and/or minimizing the impact of SSOs and building back-ups; establish procedures to timely report of the time, date, location, volume, cause, impact, and other pertinent information of all SSOs and building back-ups to the appropriate regulatory agency(ies); and notification methods to the potentially impacted public. The SORP should have the following components:

i. The SORP should provide procedures for orally reporting to FDEP the location of any SSO by street address or any other appropriate method (i.e., latitude-longitude) within twenty-four (24) hours of the time the County first becomes aware of the SSO.

ii. The SORP should provide procedures for written reporting to FDEP within five (5) days of the time the County first becomes aware of the SSO. At a minimum, a written report should contain the following:

a. Location of the SSO by street address, or any other appropriate method (i.e., latitude-longitude).

b. Estimated date and time when the SSO began and stopped, or if still active, the anticipated time to stop the SSO.

c. Steps taken to respond to the SSO.

d. Ultimate destination of the SSO, such surface waterbody (by name), if applicable, storm drain leading to surface waterbody (by name), dry land, building, etc.

e. An estimate of the volume (in gallons) of sewage discharged.

f. Description of the sewer system component from which the SSO was released (ie., manhole, crack in pipe, pump station wet well, etc...).

g. Estimate of the SSO's impact on public health and water quality in the receiving water body.

h. Cause or suspected cause of the SSO.

i. The date of the last SSO at the same location within the past five years.

j. Steps taken or to be taken to reduce, eliminate, and prevent recurrence of the SSO with a schedule of major milestones for those steps.

k. Report of all notifications to the public and other agencies or departments.

iii. The SORP should provide procedures for maintenance of records for at least five (5) years from the date of an SSO, including all written and/or electronic documents including but not limited to: written reports to FDEP; field crew notes, work orders, pictures, response times and corrective actions taken; records documenting steps that have been and will be taken to prevent the SSO from recurring, including work order records associated with investigation and repair activities; and a list and description of complaints from customers or others regarding an SSO.

iv. The SORP should establish procedures for identifying the cause of an SSO, for identifying the extent of potential threats to human health or the environment from the SSO, and for quantifying the volume and duration of the SSO.

v. The SORP should provide procedures for responding to SSOs in a timely manner to minimize the environmental impact and potential human health risk, and should include, but not be limited to, the following:

a. A detailed description of the procedures to immediately provide notice to the public that may be impacted by the SSO (through the local news media or other means including without limitation signs or barricades to restrict access).

b. A detailed description of the procedures for ensuring that the County is made aware of all SSOs as expeditiously as possible, and the responsibilities of employees (by position) charged with responding to SSOs.

c. A detailed description of the procedures to provide notice to appropriate local agencies/authorities.

d. A detailed description of the procedures (including response standard operating procedures) to minimize the volume of untreated wastewater discharged at an SSO location.

e. A detailed description of pump station-specific emergency procedures, bypass/ pump-around strategies, and estimated storage capacity (i.e., maximum volume of sewage that can be stored in the event of a pump station failure or repair without causing an SSO and estimated time during which sewage can be stored before an SSO will occur).

f. In the event that a repair may cause or lengthen the time of an SSO, a detailed procedure for determining when additional storage or pump around will be needed.

g. A detailed plan for cleaning up all SSOs completely and expeditiously.

h. A detailed plan describing the standard operating procedures to be followed by the County personnel in responding to building backups, including:

i. Methods for communicating with customers about how to report building backups and how to obtain clean-up.

ii. Response to building backups, including timeframe for responses, measures to be taken to clean up building backups caused by conditions in the County's WCTS, procedures to disinfect and/or remove potentially contaminated items (i.e. wet vacuuming, wiping floors and walls with disinfectant, flushing out and disinfecting plumbing fixtures, carpet cleaning or replacement), procedures to correct or repair conditions in the sewer system causing or contributing to the building backup, and the follow-up process to insure adequacy of cleanup.

iii. Resources to correct or repair the condition causing or contributing to the building backup.

iv. The process a customer may follow to dispute a determination by the County personnel that a wastewater backup into a building is caused by a blockage or other malfunction of a private lateral, and therefore is not a building backup.

vi. The SORP should provide procedures for providing adequate training necessary for the County employees, contractors, and personnel of other affected agencies to effectively implement the SORP. The SORP should provide training guidelines to ensure adequate response training is provided to management and

field personnel responsible for responding to SSOs. The SORP should provide procedures for adequate training to response personnel for estimating volumes from SSOs.

vii. The County should establish procedures for remedying the cause of an SSO. Standard repairs for typical SSO causes should be identified, as should the resources needed and available for such repairs. Procedures for diverting flow around blockages or line failures should be included, as should procedures for minimizing human contact with sewage. Standard containment procedures for typical SSOs should be identified.

viii. The County should identify and include in the SORP a list of those SSO locations within the WCTS that have been recorded as overflowing more than once in a 12 month period and those locations at which an SSO is likely to occur first in the event of pump station failure for each pump station. The SORP should provide procedures for establishing routine inspection routes to be performed after each rain event. The inspection routes should include all SSO locations identified as having occurred more than once in a 12 month period, and all pump stations that are not monitored at a central location via remote monitoring devices.

ix. The County should ensure all SSOs are thoroughly documented and tracked by location, date, and volume.

B. Conclusion

The County's personnel appear knowledgeable about the operation and maintenance of the system; however, some of the deficiencies noted above are of concern. In particular, the County has had 8 large volume SSOs that are related to force main ruptures and/or damage due to contractors. In addition, there appears to be inconsistent reporting of SSOs to FDEP, as well as numerous building backups caused by conditions in the County's WCTS. These deficiencies highlight the need for the development (or improvement) and implementation of formal written MOM programs as well as the completion of significant WCTS infrastructure capital improvements.

BLANK PAGE

#14

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 10 2016

CERTIFIED MAIL 7011 3500 0003 2064 3834
RETURN RECEIPT REQUESTED

Parker Hannifin Corporation
Mobile Climate Systems Division
ATTN: Mr. Rodney Maronay
Regional Environmental Health and Safety Manager
1620 Highway 6 East
Batesville, Mississippi 38606

Re: Notice of Violation and Opportunity to Show Cause Pursuant to Section 309(a) of the Clean Water Act (CWA), 33 U.S.C. § 1319(a) for Parker Hannifin Corporation, Batesville, Mississippi; MSP090042 issued by the State of Mississippi

Dear Mr. Maronay:

On March 25, 2014, the U.S. Environmental Protection Agency Region 4 performed an inspection of Parker Hannifin Corporation's facility (Facility) located at 1620 Highway 6 East in Batesville, Panola County, Mississippi. The purpose of the inspection was to evaluate Parker Hannifin Corporation's compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); the regulations promulgated thereunder at 40 C.F.R. Parts 403 and 433; and Permit No. MSP090042 issued to the Facility by the State of Mississippi, effective May 2, 2011 and expiring April 30, 2016.

The EPA's inspection and subsequent investigative efforts have revealed that Parker Hannifin Corporation failed to comply with Section 301 of the CWA, 33 U.S.C. § 1311 and 1317(d), and its implementing pretreatment regulations at 40 C.F.R. Parts 403 and 433, and its Permit. Specifically, the EPA hereby notifies Parker Hannifin Corporation, pursuant to Section 309(a) of the CWA, 33 U.S.C. § 1319(a), of the following findings of violations:

1. Failure to report/record initial compliance with categorical standards.

   Within 90 days after commencing a discharge to a Publicly Owned Treatment Worker (POTW), a new source is required to report and maintain record of the self-monitoring information on its compliance with pretreatment standards, per 40 C.F.R. §§ 403.12(d), 403.12(g), 403.12(l) and 403.12(o).

   Ninety days after commencing discharge to the POTW in April 2011, the Facility did not submit a report to the State of Mississippi of its initial compliance with the categorical pretreatment standards in 40 C.F.R. § 433.17. The Facility has also not maintained the required record demonstrating its initial compliance with these pretreatment standards.

2. Failure to submit periodic reports on continued compliance with categorical standards.

Pursuant to 40 C.F.R. §§ 403.12(e), 403.12(g), 403.12(l) and 403.12(o), any industrial user subject to categorical pretreatment standards must submit to the State of Mississippi, and maintain its own records of, additional periodic compliance reports at least twice a year on its compliance with categorical standards and other information.

From April 2011 until September 19, 2014, the Facility has not submitted to the State of Mississippi, or maintained its own records of, self-monitoring reports of compliance with the categorical pretreatment standards in 40 C.F.R. § 433.17.

3. Failure to comply with permit conditions.

Pursuant to 40 C.F.R. § 403.10, an industrial user holding a permit containing pretreatment standards and requirements must comply with its permit. The Facility holds Permit No. MSP090042 that includes the following pretreatment standards and requirements:

Condition No. T-24 of the permit requires "Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permittee which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit pursuant to Chapter One, Section II.A. of the Mississippi Wastewater Regulations, or if the discharge does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge." Parker Hannifin Corporation should have notified the Permit Board in April 2011 when it started using the "Technoclean" product.

Until compliance with the CWA is achieved, Parker Hannifin Corporation is considered to be in violation of the CWA and may be subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

The EPA also requests that representatives of Parker Hannifin Corporation contact the EPA within seven (7) business days of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against Parker Hannifin Corporation for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. Parker Hannifin Corporation should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial information which may reflect an inability to pay a penalty. Parker Hannifin Corporation has the right to be represented by legal counsel.

All information submitted must be accompanied by the following certification that is signed by a duly authorized company official in accordance with 40 C.F.R. § 403.12(l):

> "I certify under 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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the 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 knowing violations."

Please be aware that the EPA may use information provided during the meeting or telephone conference in any enforcement proceeding related to this matter. Failure to schedule a show cause meeting may result in a unilateral enforcement action against Parker Hannifin Corporation. Notwithstanding the scheduling of a show cause meeting, the EPA retains the right to bring further enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

Please contact Mr. Brad Ammons at (404) 562-9769 to arrange a show cause meeting or if you have any questions or concerns. Legal inquiries should be directed to Ms. Kavita Nagrani, Associate Regional Counsel, at (404) 562-9697.

Sincerely,

James D. Giattina
Director
Water Protection Division

cc: Mr. Tim Aultman
Mississippi Department of Environmental Quality

BLANK PAGE

#15

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

APR 0 9 2015

CERTIFIED MAIL 7010 1060 0002 1703 8303
RETURN RECEIPT REQUESTED

Mr. Jim Scanlon
Plant No. 3 Manager
Peavey Electronics Corporation
5022 Hartley Peavey Drive
Meridian, Mississippi 39305

Re: Notice of Violation and Opportunity to Show Cause
Peavey Electronics Corporation, Plant No. 3, Meridian, Mississippi
Pretreatment Permit No.: MSP090099, issued by the Mississippi Environmental Quality Permit Board

Dear Mr. Scanlon:

On April 24th and 25th, 2014, the U.S. Environmental Protection Agency's National Enforcement Investigations Center (NEIC) and Region 4 office conducted a Clean Water Act (CWA) compliance investigation of the Peavey Electronics Corporation, Plant No. 3 facility (Facility) located at 711 A Street in Meridian, Lauderdale County, Mississippi. The purpose of the inspection was to evaluate the Facility's compliance with the requirements of Sections 301 and 307(d) of the CWA, 33 U.S.C. §§ 1311 and 1317(d); the regulations promulgated thereunder at 40 C.F.R. Parts 403 and 402(b); and the State of Mississippi pretreatment regulations at Section 49-17-1 et seq., Mississippi Code of 1972; and Pretreatment Permit No.: MSP090099 (Permit), issued to the Facility by the Mississippi Environmental Quality Permit Board on September 21, 2009, and expired August 31, 2014. The Permit remains active and has since been reissued on October 15, 2014. The Permit is set to expire on September 30, 2019.

The EPA's inspection, as described in detail in the enclosed NEIC report, and subsequent investigative efforts have revealed that the Facility failed to comply with the requirements of the pretreatment regulations at 40 C.F.R. Parts 403 and 433.15; and the State of Mississippi pretreatment regulations, and its Permit. Specifically, the EPA has identified the following violations:

Pursuant to 40 C.F.R. § 403.10, an industrial user holding a permit containing pretreatment standards and requirements must comply with its permit. The Facility holds Pretreatment Permit No.: MSP090099 that includes the following pretreatment conditions and requirements. The non-compliant permit conditions and inspection observations are included here.

1. Condition T-15, Facilities Operation, defines narrative requirements of the Permit, which requires that the permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, 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 adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. The Permit Board may require regular reporting of internal operational and maintenance parameters where necessary to confirm proper operation of a waste treatment system.

   (i) The Facility's Standard Operating Procedures (SOP) for operating the onsite-wastewater treatment plant for wastewater from the powder coating wash cycle requires a neutralization process. EPA inspectors observed that the mixing tank for this process may not be reaching adequate mix times (7 minutes) before discharge.

   (ii) A neutral pH is not being verified prior to the start of the discharge from this neutralization process. The discharge goes directly from the mixing tanks, through the Parshall flume, to the collection system of the Meridian Publicly Owned Treatment Work.

2. Condition T-16 of the Permit requires that samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater. Also refer to the requirements of the Permit Table for Outfall 001.

   (i) The Permit requires a composited, 24-hour flow sample collection method. For some sampling requirements, the facility is incorrectly collecting grab samples to manually composite.

   (ii) The automatic sampler does not meet the minimum velocity of two feet per second. The Regulatory Requirement for automatic samplers which use a peristaltic pump, states that the apparatus must obtain adequate flow rates in the sampler tubing to effectively transport the suspended solids. To avoid solids bias, the velocity of the wastewater in sample tubing should be at least two fps and the tubing diameter should be at least 0.25 inch. Refer to the NEIC report for details of the inappropriate sampler set up.

   (iii) The purge cycle of the automatic sampler siphons a portion of the already collected sample from the compositing sample container. This voids the sample.

   (iv) Instruments used to measure pH and temperature are not being properly calibrated. High/mid/low pH ranges are not being verified, and a temperature compensating pH meter is not being used. Records of calibration are not being kept.

(v) Effluent flow was measured by the NEIC inspectors at the 2/3 position of a two inch Parshall flume in conjunction with an ultrasonic flow meter, and totalizer. An instantaneous calibration check indicated that the secondary flow measuring device was reading 2.7% less than actual flow.

3. Condition T-20, Test Procedures, for the analysis of pollutants shall include those set forth in 40 C.F.R. 136 or alternative procedures approved and/or promulgated by the EPA.

   (i) The sample containers are not being properly cleaned and stored between sample collection events. This practice is contrary to the sampling methodology found in 40 C.F.R. Part 136.

4. Condition T-21 of the Permit requires that all records and results of monitoring activities required by the permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three years, unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request.

   (i) Daily records of sampling and monitoring are not being kept for permanent record.

5. Condition R-1 of the Permit requires that for each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including:

   a. Exact place, date, and time of sampling;
   b. The dates the analyses were performed;
   c. The person(s) who performed the analyses;
   d. The analytical techniques, procedures or methods used, and
   e. The results of all required analyses.

   (i) Condition R-1 constitutes the requirements of a Chain of Custody report, which accompanies every sample collected and sent to a laboratory until analysis is done. Because of the immediacy of performing a pH analysis from a collected effluent sample, the results should be recorded on the Chain of Custody report at the time of performing that test and prior to transporting the samples to the lab. There were no records documenting that the 24-hour composite samples were monitored for temperature or maintained at <6 °C during the compositing period.

   (ii) No Chain of Custody report(s) were presented to the EPA inspectors during this inspection.

Until compliance with the CWA is achieved, Peavey Electronics Corporation, Plant No. 3, is considered to be in violation of the CWA and may be subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

The EPA also requests that representatives of Peavey Electronics Corporation, Plant No. 3 contact the EPA within **seven business days** of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against Peavey Electronics Corporation, Plant No. 3 for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. Peavey Electronics Corporation, Plant No. 3 has the right to be represented by legal counsel. Peavey Electronics Corporation, Plant No. 3 should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial information which may reflect an inability to pay a penalty.

All information submitted must be accompanied by the following certification that is signed by a duly authorized company official in accordance with 40 C.F.R. § 403.12(l):

> "I certify under 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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the 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 knowing violations."

Please be aware that the EPA may use information provided during the meeting or telephone conference in any enforcement proceeding related to this matter. Failure to provide a response may result in a unilateral enforcement action against Peavey Electronics Corporation, Plant No. 3. Notwithstanding a response from Peavey Electronics Corporation, Plant No. 3, the EPA retains the right to bring further enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

Enclosed is a document entitled *U.S. EPA Small Business Resources-Information Sheet* to assist Peavey Electronics Corporation, Plant No. 3 in understanding the compliance assistance resources and tools available to it. Any decision to seek compliance assistance at this time, however, does not relieve Peavey Electronics Corporation, Plant No. 3 of its obligation to the EPA nor does it create any new rights or defenses and will not affect the EPA's decision to pursue enforcement action.

In addition, the Securities and Exchange Commission (Commission) requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist Peavey Electronics Corporation, Plant No. 3, the EPA has also enclosed a document entitled *Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings.*

Should you have any questions or concerns pertaining to this letter, and to arrange a show cause meeting please contact Ms. Pamala Myers at (404) 562-9421. All legal inquiries should be directed to Mr. Phillip Mancusi-Ungaro, Associate Regional Counsel, at (404) 562-9519.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosures

cc: Mr. Chris Sanders, Manager
Office of Pollution Control, Mississippi Department of Environmental Quality

Mr. Mohammad Yassin, Compliance Manager
Office of Pollution Control, Mississippi Department of Environmental Quality

[redacted]

[redacted]

United States Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Criminal Enforcement, Forensics and Training

National Enforcement Investigations Center

NEICVP1081E01

CLEAN WATER ACT COMPLIANCE INVESTIGATION

Peavey Electronics Corporation, Plant No. 3
711 A Street
Meridian, Mississippi
NEIC Project No.: VP1081

August 2014

Project Manager:

Trent Rainey, P.E., Environmental Engineer

Other Contributors:
Jessica Duggan, Physical Scientist
Willis Collins, Principal Analytical Chemist

Prepared for:

EPA Region 4
61 Forsyth Street
Atlanta, Georgia 30303

Authorized for Release by:

Suzanne Schulman, Civil Services Section Chief

NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
P.O. Box 25227
Building 25, Denver Federal Center
Denver, Colorado 80225

CONTENTS

INTRODUCTION 3
FACILITY BACKGROUND 3
REGULATORY BACKGROUND 3
ON-SITE INSPECTION SUMMARY 4
INTRODUCTION 4
INSPECTION ACTIVITIES 4
Effluent Sampling 5
SUMMARY OF OBSERVATIONS 6
AREAS OF POTENTIAL NONCOMPLIANCE 6
AREA OF CONCERN 10

TABLE

Table 1. SUMMARY OF OBSERVATIONS 6

APPENDICES (**NEIC-Created Documents)*

A MWPC Permit No. MSP090099 (25 pages)
B Pretreatment Rationale for Renewal of MDEQ Permit No. MSP090099 (13 pages)
C NEIC Photo Log (12 pages)*
D CSI Peavey Electronics Corporation (65 pages)
E Calibration Procedure for pH Meter (1 page)
F NEIC Summary of DMRs (1 page)*
G Peavey Plant 3 December 2013 DMR (4 pages)

This Contents page shows all of the sections contained in this report and provides a clear indication of the end of this report.

INTRODUCTION

At the request of U.S. Environmental Protection Agency (EPA) Region 4, EPA's National Enforcement Investigations Center (NEIC) conducted a Clean Water Act (CWA) compliance investigation of the Peavey Electronics Corporation, Plant No. 3 facility (Peavey), located in Meridian, Mississippi. Peavey is authorized to discharge process wastewaters to the Meridian publicly owned treatment works (POTW) under a Mississippi Water Pollution Control (MWPC) permit. Facility pollution control, wastewater generation, and wastewater management operations for the Peavey facility are subject to environmental permits and regulations administered by the EPA and the Mississippi Department of Environmental Quality (MDEQ).

FACILITY BACKGROUND

Peavey is an electronics equipment manufacturer, specializing in making musical instruments, amplifiers, and professional audio systems. Peavey was founded in 1965 by Hartley Peavey, and the company headquarters are located at 711 A Street, Meridian, Mississippi.

Peavey has been assigned EPA Registry Identification No. 110000376931. According to EPA's Enforcement and Compliance History Online (ECHO) website, Peavey was last inspected for compliance with CWA requirements in August 2013. Peavey has been categorized in the North American Industry Classification System as an audio and video equipment manufacturer (334310) and in the Standard Industrial Classification system as a household audio and video equipment manufacturer (3651).

REGULATORY BACKGROUND

Peavey is authorized to discharge treated process wastewater through outfall 001 to the Meridian POTW under MDEQ-issued MWPC permit No. MSP090099 (MWPC permit; **Appendix A**). Peavey's MDEQ permit was issued on September 21, 2009, and will expire August 31, 2014 unless reauthorized. Peavey is also subject to the general pretreatment regulations under 40 Code of Federal Regulations (CFR) Part 403 and metal finishing regulations under 40 CFR Part 433. According to MDEQ's pretreatment rationale for renewal, the discharge limitations in Peavey's MWPC permit are based on the following criteria: metal finishing categorical based standards, water quality criteria, technology-based effluent limitations, and previous permit limits (**Appendix B**).

ON-SITE INSPECTION SUMMARY

INTRODUCTION

NEIC conducted the on-site inspection of Peavey facility April 24 and 25, 2014. The NEIC inspection team consisted of Trent Rainey and Jessica Duggan. EPA Region 4 was represented by Pamala Myers. The EPA Region 4 Science and Ecosystem Support Division (SESD) was represented by Jairo Castillo, Cornell Gayle, Bill Simpson, and Louis Salguero. MDEQ was represented by Charles Blount and Mohammad Yassin.

Credentials were presented to Jim Scanlon, Peavey plant manager, during the opening meeting on April 24, 2014. A closing meeting was held on April 25, 2014, to discuss the preliminary inspection observations. NEIC stressed that final determinations will be made in conjunction with EPA regional personnel and following review of documents provided by Peavey. The "Summary of Observations" section of this report summarizes the observations of the investigation.

INSPECTION ACTIVITIES

NEIC's main objective of the investigation was to evaluate Peavey's compliance with MDEQ-issued MWPC permit No. MSP090099. NEIC inspectors held detailed discussions with Peavey staff and observed the facility processes, wastewater generation sources, treatment facilities, outfall location, and sampling and monitoring activities. NEIC also evaluated Peavey's compliance with the pretreatment regulations under 40 CFR Part 403 and metal finishing regulations under 40 CFR 433. Photographs taken by the NEIC inspection team are located in **Appendix C.**

Peavey produces electronic amplifiers, sound boards, and speakers. The plant's production areas are divided between cabinet manufacturing (including sheet metal stamping and cutting and powder coating), circuit board assembly, and final assembly. Thin-gauge steel sheet is cut to specification and then hole-punched and bent with machine presses. The metal parts are hung on a conveyor system. The conveyor passes the parts through a continuous phosphate parts washer and powder coating spray booths. The parts wash prepares the metal for application of the powder coating. The chemicals used in the parts wash are Freiclean (an alkaline liquid cleaner used to remove oil, phosphate and lubricant) and Freibond (a phosphate product used as a paint base for subsequent coatings). These products are purchased in 55 gallon drums and stored just outside the cleaning and coating areas. Freiclean and Freibond are pumped from the drums into the appropriate tanks in the parts washer as needed. The drums are kept on pallets. All floor drains in the area drain to the metal wash pretreatment system described below. The sprayed parts are baked in an electric oven, and then allowed to cool. The coated parts are then sent to the assembly area. Wash water from the spray booths is collected in a tank, then pumped to the wastewater treatment system.

Wastewater treatment for the metal wash is primarily a pH neutralization system. Wash water is pumped to the pH neutralization tank, a 3,000-gallon plastic tank. When the tank is full, recirculation pumps are activated, creating a continuous circuit out of, and back into, the tank. Acid or caustic is added to adjust the pH of the wastewater to a range of 6.2 to 8.8. Once the solution is sustained in this range, a three-way valve opens to drain the tank to a Parshall flume for flow measurement. Effluent compliance samples are collected with an automatic sampler and by grab downstream of the flume. The effluent then discharges to the municipal sewer.

Circuit boards are assembled by machine and by hand in a clean room. A washer is used for cleaning the stencils used to coat the circuit boards with solder the electronic components are attached. A cleanup sink collects rinse water in a tank. Both the washer and the cleanup sink discharge to a sump tank. The sump tank pumps the collected wastewater through two sequential sand filters, which is the only pretreatment for this stream; there is no pH adjustment provided for this waste stream. The effluent from the sand filters is added to the effluent from the pH neutralization system just upstream of the Parshall flume.

Effluent Sampling

As part of the inspection activities, SESD collected effluent samples from the pretreatment system. These samples were analyzed at the SESD laboratory in Athens, Georgia. The SESD laboratory report is included as **Appendix D**. All sample collection and analysis were conducted under the auspices of SESD's sampling and laboratory analysis protocols and do not fall under the scope of NEIC's accreditation. Peavey collects self monitoring samples at a point just downstream of the Parshall flume.

SUMMARY OF OBSERVATIONS

Observations made by NEIC during the investigation are summarized in **Table 1**. These observations are linked to specific supporting documents that can be found in individual appendices to this table. These observations can be categorized as either areas of potential noncompliance (AON) or areas of concern (AOC). Areas of concern are inspection observations of potential problems or activities that could impact the environment, result in future or current noncompliance, and/or are areas associated with pollution prevention. U.S. EPA Region 4 will assess the applicability of regulatory requirements based on its review of this report and other technical, regulatory, and facility information.

Table 1. SUMMARY OF OBSERVATIONS
Peavey Electronics Corporation, Plant No. 3
Meridian, Mississippi

#	Regulatory Citation	Observations/Supporting Notes	Evidence
AREAS OF POTENTIAL NONCOMPLIANCE			
1	**MWPC Permit No. MSP090099, Narrative Requirements, Condition No. T-16, Representative Sampling** – *Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater. [WPC-1 Chapter One Section IV.A(28)e]* **MWPC Permit No. MSP090099, Narrative Requirements, Condition No. T-20, Test Procedures** – *Test procedures for the analysis of pollutants shall include those set forth in 40 CFR 136 or alternative procedures approved and/or promulgated by EPA. [WPC-1 Chapter One Section IV.A(30)]* **40 CFR 136.3(e) Table II – Required Containers, Preservation Techniques, and Holding Times – Footnote 2** *[2]Except where noted in this Table II and the method for the parameter, preserve each grab sample within 15 minutes of collection. For a composite sample collected with an automated sample (e.g., using a 24-hour composite sample, see 40 CFR 122.21(g)(7)(i) or 40 CFR Part 403, Appendix E), refrigerate the sample at ≤6 °C during collection unless specified otherwise in this Table II or in the method(s). For a composite sample to be split into separate aliquots for preservation and/or analysis, maintain the sample at ≤6 °C, unless specified otherwise in this Table II or in the method(s), until collection, splitting, and preservation is completed. Add the preservative to the sample container prior to sample collection when the preservative will not compromise the integrity of a grab sample, a composite sample, or aliquot split from a*	<u>Observation</u> **The sample jar used for collecting composite samples is not being properly cleaned and could cause unrepresentative sampling.** <u>Supporting Notes</u> The sample containers used for collecting samples were periodically rinsed with tap water between sampling events, and occasionally cleaned with bleach. There were no proper decontamination facilities provided for cleaning the sample containers. Proper decontamination for sample jars and containers requires the use of deionized water and reagents such as nitric acid, acetone, hexane, and methanol, depending on the types of sample being collected. Peavey had none of the required decontamination supplies. Sample containers also need to be stored in an area where they can be kept free of possible contamination. The sample container used by Peavey was stored in the automatic sampler between sample events. <u>Observation</u> **The sampler tubing for the automatic sampler was cut too long and drawing sample out of the sample container.**	**Appendix A –** MWPC Permit No. MSP090099 **Interviews with Peavey Personnel** **Appendix C** – NEIC Photo Log

Table 1. SUMMARY OF OBSERVATIONS
Peavey Electronics Corporation, Plant No. 3
Meridian, Mississippi

#	Regulatory Citation	Observations/Supporting Notes	Evidence
	composite sample within 15 minutes of collection. If a composite measurement is required but a composite sample would compromise sample integrity, individual grab samples must be collected at prescribed time intervals (e.g., 4 samples over the course of a day, at 6-hour intervals). Grab samples must be analyzed separately and the concentrations averaged. Alternatively, grab samples may be collected in the field and composited in the laboratory if the compositing procedure produces results equivalent to results produced by arithmetic averaging of results of analysis of individual grab samples. For examples of laboratory compositing procedures, see EPA Method 1664 Rev. A (oil and grease) and the procedures at 40 CFR 141.34(f)(14)(iv) and (v) (volatile organics).	<u>Supporting Notes</u> Composite samples were collected using an automatic sampler crafted by the facility. Sample aliquots are drawn out of the discharge flume using a peristaltic pump. The aliquots are deposited into a glass jar inside the sampler. During the sample collection cycle, the automatic sampler is programmed to purge the sample tubing by running the pump backwards, which should force air through the tubing, before drawing an aliquot. The sampler tubing inside the automatic sampler was cut to a length that permitted it to project into the sample jar. As the jar fills, collected sampler liquid could be drawn out of the jar during the purge cycle, leading to the collection of an unrepresentative composite sample. <u>Observation</u> **The automatic sampler used for collecting composite samples is not refrigerated or cooled, which is necessary to minimize reactivity in the sample that could affect the measured concentration of the sample parameters.** <u>Supporting Notes</u> The composite automatic sampler used by Peavey was crafted on-site. This sampler is not refrigerated or cooled with ice during the sample collection process. 40 CFR 136 requires that samples collected for National Pollutant Discharge Elimination System (NPDES) reporting purposes be maintained at a temperature between less than or equal to 6 degrees Celsius in order to minimize chemical reactions that could affect the measured characteristics or concentration of the parameters being sampled.	
2	**MWPC Permit No. MSP090099, Narrative Requirements, Condition No. T-21, Records Retention** – *All records and results of monitoring activities required by this permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three (3) years, unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request. [WPC-1 Chapter One Section IV.A(29)a]*	<u>Observation</u> **Peavey records pH meter calibration, effluent flow, and effluent pH on scraps of paper before transferring the information into a computer work station, and does not retain the notes.** <u>Supporting Notes</u>	**Appendix A** – MWPC Permit No. MSP090099 **Interviews with Peavey personnel**

Table 1. SUMMARY OF OBSERVATIONS
Peavey Electronics Corporation, Plant No. 3
Meridian, Mississippi

#	Regulatory Citation	Observations/Supporting Notes	Evidence
		Peavey's MWPC permit requires all monitoring activities, including calibration and maintenance records, to be retained for three years (Appendix A). The Peavey employee responsible for the pH meter calibration, effluent flow, and effluent pH recorded on the discharge monitoring reports (DMRs) does not have a logbook to record the information. Instead, he uses scraps of paper that he stores in his pocket until he can return to his work station and enter the data into the computer. He then discards the scraps of paper. The original record of the monitoring and calibration are not being retained by Peavey.	
3	**MWPC Permit No. MSP090099, Narrative Requirements, Condition No. T-15, Facilities Operation** – *The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, 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 adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. The Permit Board may require regular reporting of internal operational and maintenance parameters where necessary to confirm proper operation of a waste treatment system. [WPC-1 Chapter One Section IV A(18)]*	<u>Observation</u> **Peavey's pH buffers do not bracket the expected range as stated in Peavey's calibration procedure for pH meter.** <u>Supporting Notes</u> Peavey's operator uses 7.00 and 10.01 pH buffers for calibration of the pH meter used for effluent monitoring, even though the MWPC permit specifies a pH range of 6.0 to 9.5. Peavey's pH calibration procedure directs: "choose two buffers that will bracket your expected sample range." The calibrated pH meter would not bracket the expected pH range of the effluent. <u>Observation</u> **The pH meters for the neutralization tank are calibrated with one pH buffer.** <u>Supporting Notes</u> Peavey uses a neutralization holding tank as its primary wastewater treatment system for the parts washing process. The system is monitored and controlled with inline pH meters. Peavey's calibration procedure for the inline pH meters specifies the use of a pH 7 buffer. It does not require bracketing the range of buffers to bracket the expected pH range.	**Appendix A** – MWPC Permit No. MSP090099 **Interviews with Peavey personnel** **Appendix E** Calibration Procedure for pH Meter

Table 1. SUMMARY OF OBSERVATIONS
Peavey Electronics Corporation, Plant No. 3
Meridian, Mississippi

<table>
<tr><th>#</th><th>Regulatory Citation</th><th>Observations/Supporting Notes</th><th>Evidence</th></tr>
<tr><td>4</td><td>MWPC Permit No. MSP090099, Effluent Limitations and Monitoring Requirements – Outfall 001 (Process Wastewater)
<table>
<tr><th rowspan="2">Parameter</th><th colspan="2">Discharge Limitations</th><th colspan="2">Monitoring Requirements</th></tr>
<tr><th>Loading Maximum</th><th>Concentration Maximum</th><th>Frequency</th><th>Sample Type</th></tr>
<tr><td>Organics, total toxic (TTO (40 CFR 433)) Effluent</td><td>0.33 lbs/day Daily Maximum</td><td>2.13 mg/L Daily Maximum</td><td>Semi-annually</td><td>24-hr Composite</td></tr>
</table></td><td><u>Observation</u>
Peavey collects a grab sample for total toxic organics (TTO) analysis. The MWPC permit requires collection of a 24-hour composite sample.

<u>Supporting Notes</u>
Peavey's MWPC permit requires collection of a 24-hour composite sample for TTO analysis (Appendix A). On April 25, 2014, Dewayne Allen, stated that a grab sample is collected for the semi-annual TTO analysis. Peavey uses the composite automatic sampler to pump effluent from outfall 001 into the brown, glass, TTO sample bottles.

NEIC reviewed a selection of DMRs from March 2011 through March 2014 (Appendix F). Peavey recorded on the December 2013 DMR that the TTO sample was collected as 24-hour composite (Appendix G). According to D. Allen, a grab sample is collected for the TTO analysis; thus, the sample type for TTO analysis is inaccurately reported on the DMRs.</td><td>Appendix A MWPC Permit No. MSP090099

Appendix F – NEIC Summary of DMRs

Appendix G – Discharge Monitoring Report for December 2013

Interviews with Peavey personnel</td></tr>
</table>

Table 1. SUMMARY OF OBSERVATIONS
Peavey Electronics Corporation, Plant No. 3
Meridian, Mississippi

#	Regulatory Citation	Observations/Supporting Notes	Evidence
AREA OF CONCERN			
A	**MWPC Permit No. MSP090099, Narrative Requirements, Condition No. T-16, Representative Sampling** – *Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater. [WPC-1 Chapter One Section IV.A(28)e]*	**Observation** **Supporting Notes** **Because Peavey does not use a temperature-compensated pH meter, and does not calculate the compensation due to temperature, the pH recorded on the DMRs may not be accurate.** The pH meter used for effluent sampling does not have a built in thermometer. Peavey does not use a National Institute of Science and Technology (NIST)-certified thermometer to check the temperature of the sample. Sample temperature can affect the pH and should be accounted for when taking measurements. **Observation** **Peavey does not calibrate the pH meter before each sampling event.** **Supporting Notes** Peavey representatives stated that the outfall 001 pH meter is only calibrated when the batteries are replaced. The batteries are replaced approximately 1-2 times per month. This infrequent calibration may allow drift in the instrument to become significant and affect the accuracy of the reported results.	**Appendix A – MWPC Permit No. MSP090099** **Interviews with Peavey personnel**

BLANK PAGE

#26

PPM CONSULTANTS

Environmental Planning and Engineering

September 3, 2015

Ms. Pamala Myers
Environmental Protection Agency
Region 4
Municipal & Industrial Enforcement Section
Clean Water Enforcement Branch
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Re: Wastewater Treatment Process Closure Schedule
Peavey Electronics Corporation
Plant Number 3
711 A Street
Meridian, Lauderdale County, Mississippi
Permit No. MSP090099

Dear Ms. Myers:

On behalf of Peavey Electronics Corporation (Peavey), PPM Consultants, Inc. (PPM) is submitting this summary of wastewater process closure activities conducted to date for the Peavey Plant 3 facility located in Meridian, Mississippi. This information was requested during the United States Environmental Protection Agency (USEPA) Notice of Violation and Opportunity to Show Cause teleconference held on July 15, 2015. During the teleconference, the USEPA requested that Peavey provide written details of closure activities conducted to date, as well as information regarding the process Closure Plan, which will be submitted to both the USEPA and the Mississippi Department of Environmental Quality (MDEQ) for review.

As previously mentioned in the Notice of Violation and Opportunity to Show Cause correspondence dated April, 23, 2015, it was indicated that most of the production at Peavey Plant 3 and all operations involving wastewater discharge were ceased in November 2014. Following process closure, the staged washing system and drainage pit were drained and flushed on November 21, 2014. The sides and base of the washing system and pit were then cleaned with water via a pressure washer and hand tools. The solids were removed from the equipment and pit and placed in 55-gallon drums. The last discharge from the wastewater treatment system, following cleaning, was conducted on November 25, 2014. Composite samples of the solid material were collected and

submitted to ESC Lab Sciences in Mount Juliet, Tennessee on December 4, 2014 for analysis of Toxicity Characteristic Leaching Procedure (TCLP) metals via EPA Method 6010B/7470A and corrosivity via EPA Method 9045D. The sample results were below the laboratory detection limit in each sample collected for TCLP analysis and non-corrosive. Following the last treatment system discharge on November 25, 2014, water service to the wastewater treatment system was disconnected and lines were capped; the wastewater treatment tank was locked and tagged out; and the Parshall Flume was removed. Remaining solids were removed from the base of the wastewater treatment tank in June 2015 and composite samples were collected of the solids and submitted to ESC Lab Sciences on June 12, 2015. The composite samples were analyzed for TCLP volatile organic compounds (VOCs) via EPA Method 8260B, TCLP semi-volatile organic compounds (SVOCs) via EPA Method 8270C, TCLP metals via EPA Method 6010B/7470A, corrosivity via EPA Method 9045D, ignitability via EPA Method D93/101, and reactivity via EPA methods 9012B/S and 9034/90. **The laboratory results were below the laboratory detection limit, non-corrosive, not reactive, and not ignitable.** The 6-stage washing system, former wastewater treatment tank, and the drummed non-hazardous solid material are currently pending disposal.

Although the facility is not discharging process wastewater, monthly discharge monitoring reports (DMRs) have continued to be submitted to the MDEQ. Peavey will continue to submit monthly DMRs to the MDEQ until termination of the pretreatment permit. A Closure Plan is currently being prepared and will be submitted to the USEPA and MDEQ for review upon completion.

If additional information is needed for review, please contact either of us at (205) 836-5650. We appreciate your consideration of this matter.

Sincerely,
PPM Consultants, Inc.

Elizabeth J. Grinder

Elizabeth Grinder, CHMM
Senior Scientist/Project Manager

Michael D. McCown

Michael D. McCown, P.G.
Principal/Senior Geologst

c: Philip G. Mancusi-Ungaro, USEPA Region 4
Courtland Gray, Peavey Electronics Corporation
Steven Daniel, Peavey Electronics Corporation
John Milner, Brunini, Grantham, Grower & Hewes, PLLC

BLANK PAGE

#17

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 12 2016

CERTIFIED MAIL 7015 1730 0002 0524 3891
RETURN RECEIPT REQUESTED

Steel King Industries, Inc.
ATTN: Mr. John Cothran
Plant Manager
30 Floyd Industrial Blvd.
Rome, Georgia 30161

Re: Notice of Violation and Opportunity to Show Cause Pursuant to Section 309 of the Clean Water Act (CWA), 33 U.S.C. § 1319, and Information Request Pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, for Steel King Industries, Inc., Rome, Floyd County, Georgia

Dear Mr. Cothran:

On March 2, 2016, a contractor on behalf of the U.S. Environmental Protection Agency Region 4 performed an Industrial User Inspection of Steel King Industries, Inc.'s facility (Facility) located at 30 Floyd Industrial Boulevard in Rome, Floyd County, Georgia. The purpose of the inspection was to evaluate Steel King Industries, Inc.'s compliance with the requirements of Sections 301 and 307(d) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1317(d); the regulations promulgated thereunder at 40 C.F.R. Parts 403 and 433.

The EPA's inspection, as described in the inspection report enclosed herewith as Enclosure A, and subsequent investigative efforts have revealed that Steel King Industries, Inc. failed to comply with Sections 301 and 307(d) of the CWA, 33 U.S.C. § 1311 and 1317(d), and its implementing pretreatment regulations at 40 C.F.R. Parts 403 and 433. Specifically, the EPA hereby notifies Steel King Industries, Inc., pursuant to Section 309(a) of the CWA, 33 U.S.C. § 1319(a), of the following findings of violations:

1. Significant industrial user discharge without a valid permit.

   The Facility is a significant industrial user, as defined by 40 C.F.R. § 403.3(v). The Facility is therefore required to obtain a valid permit from the City of Rome, Georgia prior to discharging to a publicly owned treatment works (POTW). See 40 C.F.R. § 403.8(f)(1)(iii). The Facility discharged process wastewater as well as solids decanting wastewater as described in Enclosure A to the City of Rome Blacks Bluff Water Pollution Control Plant without a valid permit for at least 6 years, from approximately 2010 to present.

2. New Source failure to install and operate pretreatment equipment prior to discharge.

   Pursuant to 40 C.F.R. § 403.6(b), the Facility is subject to the federal categorical pretreatment standards in 40 C.F.R. § 433.17. The Facility is a new source, as defined in

40 C.F.R. § 403.3(m), because it originated after the EPA published proposed standards for Part 433 on August 31, 1982. Steel King Industries, Inc. was thus required to install, and have in operating condition, all the pollution control equipment necessary to meet applicable Pretreatment Standards, including those in 40 C.F.R. Part 433, prior to beginning discharge to the POTW.

The Facility did not install such necessary pollution control equipment prior to beginning discharge to the POTW in 2010, and has not installed such equipment. The Facility thus has continued to discharge to the POTW without the necessary pollution control equipment, in continuing violation of 40 C.F.R. § 403.6(b).

3. Failure to report/record initial compliance with categorical standards.

Within 90 days after commencing a discharge to a POTW, a new source is required to report and maintain record of the self-monitoring information on its compliance with pretreatment standards, per 40 C.F.R. §§ 403.12(d), 403.12(g), 403.12(l) and 403.12(o).

Ninety days after commencing discharge to the POTW in 2010, the Facility did not submit a report to the City of Rome, Georgia of its initial compliance with the categorical pretreatment standards in 40 C.F.R. § 433.17. The Facility has also not maintained the required record demonstrating its initial compliance with these pretreatment standards.

4. Failure to submit periodic reports on continued compliance with categorical standards.

Pursuant to 40 C.F.R. §§ 403.12(e), 403.12(g), 403.12(l) and 403.12(o), any industrial user subject to categorical pretreatment standards must submit to the City of Rome, Georgia, and maintain its own records of, additional periodic compliance reports at least twice a year on its compliance with categorical standards and other information. From 2010 until the present, the Facility has not submitted to the City of Rome, Georgia, or maintained its own records of, self-monitoring reports of compliance with the categorical pretreatment standards in 40 C.F.R. § 433.17.

In addition, the EPA is concerned with the storage of numerous chemicals without secondary containment either on top of or near the trench drain that ultimately discharges to the City's POTW. Steel King Industries, Inc. may need to develop and implement a Slug Discharge Control Plan if these storage practices continue.

Until compliance with the CWA is achieved, Steel King Industries, Inc. is considered to be in violation of the CWA and may be subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

The EPA is continuing to investigate Steel King Industries, Inc.'s compliance with the CWA. Therefore, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, the EPA hereby requests that Steel King Industries, Inc. provide the information set forth in Enclosure B within twenty-one (21) calendar days of your receipt of this letter.

Steel King Industries, Inc.'s response should be submitted to:

Mr. Brad Ammons
U.S. Environmental Protection Agency, Region 4
NPDES Permitting and Enforcement Branch
Atlanta Federal Center (MC 9T25)
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Failure to provide a full and complete response to this information request or to adequately justify a failure to respond within the time frame specified above may result in an EPA enforcement action pursuant to federal law, including, but not limited to Section 309 of the Clean Water Act, 33 U.S.C. § 1319, and 18 U.S.C. § 1001.

If Steel King Industries, Inc. believes that any of the requested information constitutes confidential business information, it may assert a confidentiality claim with respect to such information, except for effluent data. Further details, including how to make a business confidentiality claim, are found in Enclosure C.

The EPA also requests that representatives of Steel King Industries, Inc. contact the EPA within seven (7) business days of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against Steel King Industries, Inc. for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. Steel King Industries, Inc. should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial information which may reflect an inability to pay a penalty. Steel King Industries, Inc. has the right to be represented by legal counsel.

All information submitted in response to this information request and/or during the show cause meeting must be accompanied by the following certification that is signed by a duly authorized official in accordance with 40 C.F.R. § 403.12(l):

> "I certify under 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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the 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 knowing violations."

Please be aware that the EPA may use information provided during the meeting or telephone conference and/or in response to this information request in any enforcement proceeding related to this matter. Failure to schedule a show cause meeting may result in a unilateral enforcement action against Steel King Industries, Inc. Notwithstanding the scheduling of a show cause meeting, the EPA retains the right to bring further enforcement action under Section 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

Enclosed is a document entitled *U.S. EPA Small Business Resources-Information Sheet* to assist Steel King Industries, Inc. in understanding the compliance assistance resources and tools available to it. Any

decision to seek compliance assistance at this time, however, does not relieve Steel King Industries, Inc. of its obligation to the EPA nor does it create any new rights or defenses and will not affect the EPA's decision to pursue enforcement action.

In addition, the Securities and Exchange Commission (Commission) requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist Steel King Industries, Inc., the EPA has also enclosed a document entitled *Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings*.

Please contact Mr. Brad Ammons at (404) 562-9769 to arrange a show cause meeting or if you have any questions or concerns. Legal inquiries should be directed to Ms. Kavita Nagrani, Associate Regional Counsel, at (404) 562-9697.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosures

cc: Mr. Bert Langley
Georgia Environmental Protection Division

Mr. Mike Hackett
City of Rome

Final Report

Steel King Industries, Inc.

Industrial User Pretreatment Reconnaissance Inspection

March 2, 2016

Prepared for:

EPA Region 4

61 Forsyth Street, S.W.

Atlanta, GA 30303-8960

Prepared by:

PG Environmental, LLC

607 10th Street; Suite 307

Golden, CO 80401-5817

Table of Contents

I. Introduction 3
II. Entry 3
III. Opening Conference 3
IV. Tour of Operations 4
V. Records Review 6
VI. Closing Conference 6
VII. Findings 7
VIII. Recommendations 7
IX. Attachments 8
Attachment 1 Photograph Log 9
Attachment 2.A CTI Wastewater Permit Requirement Evaluation 16
Attachment 2.B Wastewater Sludge Testing Results 35
Attachment 2.C City of Rome Industrial Wastewater Questionnaire 46
END OF REPORT 57

I. Introduction

On March 2, 2016, Ms. Kettie Holland, of PG Environmental, LLC, conducted a pretreatment reconnaissance inspection of Steel King Industries, Inc. (Steel King or facility) on behalf of the U.S. Environmental Protection Agency (EPA) Region 4. The facility's address and mailing address are the same: 30 Industrial Blvd., Rome, GA 30161. The facility has not been issued an industrial wastewater discharge permit by the Georgia Department of Natural Resources' Environmental Protection Division (State of Georgia) or the City of Rome (City). The State of Georgia was notified in advance of the inspection pursuant to its Memorandum of Agreement with the EPA. Ms. Holland was accompanied by Ms. Cindy Nix of the State of Georgia during the inspection.

The facility is located in an industrial park off of Floyd Industrial Blvd. The process areas are located within a large warehouse. The facility's latitude and longitude coordinates are 34.176892 and -85.195640, respectively.

II. Entry

Ms. Nix and Ms. Holland arrived at the facility at 1:30 P.M. and spoke with an administrative assistant at the entrance of the facility. The inspectors signed in at the front desk and Ms. Holland asked whom the appropriate person would be to meet with to discuss facility operations and potential wastewater generating operations. The administrative assistant stated that we would need to meet with Mr. John Cothran, the Plant Manager, who was in a meeting at the time of the inspection. The inspectors briefly waited in the lobby of the entrance of the facility and then met with Mr. Cothran. Introductions were exchanged and Ms. Holland provided a preliminary explanation of the purpose of the inspection.

III. Opening Conference

The group proceeded to Mr. Cothran's office where Ms. Holland presented credentials and provided a full explanation of the purpose and intent of the pretreatment reconnaissance inspection. Ms. Holland requested that Mr. Cothran provide a description of the facility's onsite operations and wastewater generating processes.

Mr. Cothran stated that the facility has been in operation since 1988 and underwent a large expansion during 2010, when the facility's metal treatment and powder coating processes were installed. The facility is a pallet racking manufacturer that also manufactures internal guard rails and cantilever racks. Mr. Cothran stated that the facility operates 24 hours per day, from Sunday night through Friday, and that the powder coating line is intermittently operated five days per week.

The facility receives several forms of steel, including angle steel, flat bar steel, channel steel, and steel sheet metal. The metal is then transported to the fabrication shop where drilling and punching take place. The fabricated metal is then taken to the weld shop where both robotic and hand welding take place.

The fabricated and welded metal part is then attached to an overhead conveyor and sent through a three-stage tunnel washer where the metal is treated by: (stage 1) washing with Hook Klene P cleaning solution (containing phosphoric acid) and a KCI Liqua Phos 6929 solution (containing phosphoric acid and nitric acid); (stage 2) rinsing with water recycled from the third stage; and (stage 3) rinsing once more with fresh City water. Mr. Cothran stated that water is continuously being added to stage 2, and

that process wastewater is continuously discharged from the system at a rate of 4-5 gallons per minute (gpm). The treated metal part is dried, then powder coated and packaged for shipping.

Mr. Cothran stated that the facility discharges its process wastewater to the City's Publicly Owned Treatment Works (POTW). He stated that City representatives have been to the facility before and that he thought that he had an industrial wastewater discharge permit from the City.

Mr. Cothran searched for the permit for several minutes and then called the facility's environmental consultants, Conversion Technology Inc. (CTI). I spoke with the environmental consultants on the phone, explaining the purpose of the inspection and that we were looking for an industrial wastewater permit issued to the facility by the City. Neither the consultants nor Mr. Cothran could locate a permit; however, during the search, Mr. Cothran found an industrial wastewater questionnaire (completed for the City), dated October 11, 2010.

Mr. Cothran also stated that the facility employees conduct a daily titration test of the solution used in the metal treatment process to identify if fresh chemicals need to be added to the system to ultimately ensure that the metal is properly treated prior to the powder coating process. He also stated that they schedule cleaning of the metal treatment system approximately every 10 to 12 weeks. The sludge waste collected from the system is hauled offsite for disposal.

Mr. Cothran stated the pH of the cleaning solution and iron phosphate-based cleaner used within the first stage of the metal treatment process is adjusted prior to discharging to the City's POTW. There is no additional treatment of the cleaning solution prior to discharging to the City's POTW.

IV. Tour of Operations

The group exited Mr. Cothran's office and began the tour of operations in the warehouse where the manufacturing takes place. In the receiving area where the raw metals are stored at the facility, Ms. Holland did not observe floor drains, but did observe a stand-alone parts washer that did not have a sewer connection, automated plasma cutting torches, precision drills, multiple brake presses, and scrap metal containers.

Ms. Holland also observed a wet sweeper in this area of the facility that has a pipe connecting the sweeper to the sewer connection. Mr. Cothran stated that the content of the wet sweeper was discharged to the City's POTW in conjunction with the wastewater from the metal pretreatment system.

The group then proceeded to the welding area of the facility where Ms. Holland observed semi-robotic welders, hand welders, and robotic welders. Floor drains or other sewer connections were not observed in this area of the facility.

The group then proceeded to a room where the tunnel washer was located for the metal treatment process (Attachment 1, Photograph 1). The first stage of the system consisted of an automated spray application of Hook Klene P cleaning solution (containing phosphoric acid) and Liqua Phos 6929 (containing phosphoric acid and nitric acid) (Attachment 1, Photographs 2 through 4). The solution was captured in a reservoir (with an approximate capacity of 4,400 gallons) and reused in stage one (Attachment 1, Photograph 5).

Between the first and second stages of the metal treatment process, Ms. Holland observed an unplumbed hand sink. It appeared that water from the sink was discharged to the trench drain and to the City's POTW (Attachment 1, Photograph 6).

The second stage of the metal treatment process had a reservoir with an approximate capacity between 1,200 and 1,800 gallons. Used rinse water from the third stage was collected in the reservoir and was applied in this initial rinse after the Hook Klene P and Liqua Phos 6929 had been applied. Rinse water overflow from this stage discharged to the trench drain located in the metal treatment process room. The trench drain flows to the City's POTW. Ms. Holland observed a discharge occurring from this stage at the time of the inspection (Attachment 1, Photograph 9).

During the third stage of the metal treatment process, fresh City water was used for the final rinse of the metal parts. Ms. Holland observed a reservoir that was approximately the same size as the second stage reservoir (i.e., between 1,200 and 1,800 gallons) used for supplying water to the system for the final metal treatment rinse (Attachment 1, Photograph 10).

Process wastewaters generated from the metal treatment process are collected in a trench drain that runs parallel to the tunnel washer. The drain conveys the process wastewaters to what appeared to be an oil separator within a large pit located under the floor grating. Mr. Cothran explained that this device was used for solids settling, and the discharge from the device is conveyed through a PVC pipe to the City's POTW. Ms. Holland observed accumulated solids and sludge collected within the pit, making it difficult to see the discharge pipe to the POTW (Attachment 1, Photograph 11). The configuration of the piping was also unclear. Mr. Cothran was unable to explain how the wastewater was collected within the pit and discharged to the POTW. Specifically, we observed a curved PVC pipe that Mr. Cothran believed was the discharge pipe. Without the presence of a pump, it was unclear how wastewater would be conveyed through the PVC pipe to the POTW.

In this pit area, Ms. Holland also observed a pipe leading from the area where the facility's wet sweeper was parked. Mr. Cothran explained that the liquid from the wet sweeper was discharged through the pipe, to the pit, and ultimately to the City's POTW.

Ms. Holland observed 55-gallon drums of various chemicals in the room where the metal treatment process tunnel washer was located. These drums contained pH adjustment chemicals that were referred to as "pH Up" (an alkaline product) and "pH Down" (an acidic product). Ms. Holland also observed JK 100 (a liquid alkaline product), and a defoaming product stored within the same area (Attachment 1, Photographs 7 and 8).

Ms. Holland observed a number of chemicals in the metal treatment area that were stored directly on top of the trench drain that led to the pit and ultimately to the POTW, including multiple 55-gallon drums of acid, Liqua Phos 6929, and alkaline. In the event of a spill or leak, it appeared that the content of the drums would discharge directly to the wastewater pit and to the POTW because they did not have any secondary containment. Mr. Cothran did not know the volume of wastewater that was generated and discharged from the tunnel wash process to the POTW.

Mr. Cothran stated that when the metal treatment process undergoes cleaning (approximately every 10 to 12 weeks), the solids cleaned from the tunnel washer reservoirs are collected in a 55-gallon drum. He also stated that holes are drilled in the drums and the concentrated liquids are allowed to leak from the

drums into the wastewater pit and ultimately to the POTW. The remaining solids are hauled offsite for disposal.

Mr. Cothran explained that after the metal parts went through the metal treatment process, they were dried and then powder coated with one of the facility's 13 standard colors, dried further in an oven, and then packaged for shipping.

V. Records Review

During the opening conference, Mr. Cothran mentioned that the facility contracts with CTI to provide assistance with stormwater and wastewater management at the facility. Ms. Holland asked if CTI had evaluated or conducted monitoring of the discharges from the metal treatment system to the POTW. Mr. Cothran said that they had conducted monitoring and provided the following documents:

- Wastewater Permit Requirement Evaluation (conducted by CTI), dated June 30, 2010.
- Sludge Testing (Toxicity Characteristic Leach Procedure for metals), dated July 7, 2010.
- Industrial Wastewater Questionnaire (completed for the City of Rome), dated October 11, 2010.

According to the Wastewater Permit Requirement Evaluation provided by CTI, dated June 30, 2010 (Attachment 2.A), the facility generated and batch-discharged wastewater one to two times per year to the POTW. At that time, the facility generated and discharged wastewater from product washing after the metal coating and painting processes. Ms. Holland observed inconsistencies with this discharge information at the time of the inspection, indicating that the facility's wastewater generation and discharge practices have changed since 2010.

The Evaluation also states that grab samples of wastewater discharges were collected and analyzed. These samples were collected on June 7, 2010. The wastewater samples were tested and the results showed that the wastewater discharged from the facility were below the City Discharge Limits (these limits were not defined in the Evaluation document). However, it should be noted that the grab samples collected were not compliant with the categorical monitoring requirements in 40 C.F.R. § 403.12(g) for sampling metals.

The Evaluation further stated that the facility was not subject to federal categorical standards based on the facility's Standard Industrial Classification codes. The results of the Sludge Testing and the Industrial Wastewater Questionnaire completed by the facility are provided as Attachments 2.B and 2.C, respectively.

VI. Closing Conference

After the inspection of the process and operation areas, we returned to the office where the opening conference had occurred. Ms. Holland explained that, based on the information provided and observed during the inspection, the wastewaters generated and discharged to the City's POTW from the facility's metal treatment process prior to powder coating was subject to the federal categorical regulations at 40 C.F.R. Part 433, Metal Finishing. Ms. Holland relayed it was surprising that the facility had completed and submitted an Industrial Wastewater Questionnaire but had not been permitted, sampled, or formally inspected by the City. The inspectors exited the facility at 3:18 P.M.

VII. Findings

A. The facility was generating and discharging process wastewater to the City's POTW from its metal treatment process at the time of the inspection, and appears to have been doing so since the process was installed in 2010. The facility's metal treatment process is equivalent to phosphating, which is a core process in 40 C.F.R. § 433.10(a), Metal Finishing. All discharges from the facility's metal treatment process are therefore regulated, and the facility is subject to the categorical pretreatment standards for new sources in 40 C.F.R. Part 433. The facility accepted incorrect advice from its consultant, CTI, regarding its categorical status.

   In addition to the metal finishing standards, the pretreatment standards and requirements identified in 40 C.F.R Part 403, General Pretreatment Regulations for Existing and New Sources of Pollution, also apply to the facility's non-domestic discharges to the public sewer. Upon discharge to the POTW, it appears the facility did not: (1) previously install the pretreatment necessary to meet standards pursuant to 40 C.F.R. § 403.6(b); (2) submit to the City (its pretreatment control authority) the initial and routine reporting for categorical users pursuant to 40 C.F.R. § 403.12; and (3) obtain a significant industrial user permit from the City pursuant to law.

B. During the inspection of the wastewater collection pit, Ms. Holland observed a significant amount of solids accumulated within the pit. Whether or not this was a normal condition for the facility, and how it may impact the POTW, were unclear.

C. The facility's practice of discharging the liquid concentrate from the solids collected from the metal treatment process reservoirs during routine cleaning may contain significant concentrations of metals which have the potential to violate federal standards and/or have a negative impact on the City's POTW.

D. The facility did not appear to know the exact amount of flow being discharged to the POTW.

VIII. Recommendations

A. Due to the activities that are subject to regulation, the facility should take the appropriate steps to ensure that it has received an industrial user permit before continuing to discharge its wastewater to the City's POTW. Specifically, the facility should contact the City to obtain the proper permits for the facility's discharge.

B. The facility should fully understand the method and process by which its wastewater discharges to the City's POTW. Specifically, developing a schematic depicting the internal and external pipe connectivity and the wastewater flow rates would be helpful.

C. The facility should conduct monitoring of the regulated process wastewaters to ascertain their pollutants and concentrations, and report this to the City. The most recent monitoring data provided by the facility was collected on June 7, 2010, and may not be representative of the current quality of

the wastewater discharged from the facility to the City's POTW. The facility also must meet the self-implementing reporting requirements for categorical industrial users in 40 C.F.R. § 403.12.

D. The facility should obtain and install a calibrated flow measurement device to identify the volume of wastewater generated and discharged from its regulated categorical wastewater operations prior to the introduction of any diluting streams. The facility should also work with the City to determine the necessity of installing an effluent pH meter or other measurement devices to ensure that the wastewater does not cause harm to the POTW or cause pass through, interference, and/or upsets at the treatment facility or in any other way cause the City to violate its own discharge permit.

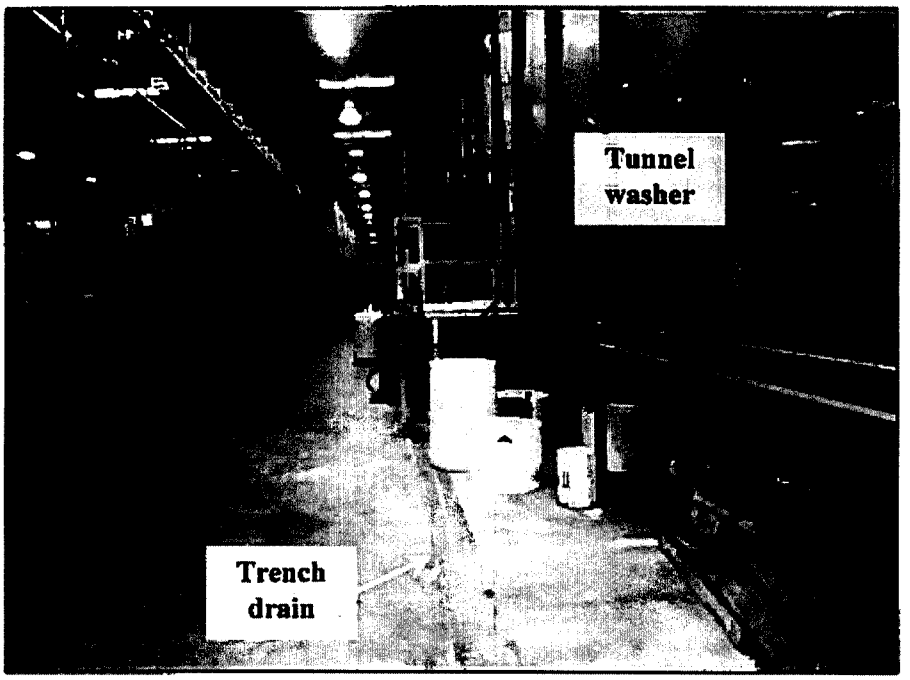
E. The City should issue the facility a significant industrial user permit and meet the terms of its pretreatment program approved by the State of Georgia and identified in its NPDES permit.

IX. Attachments

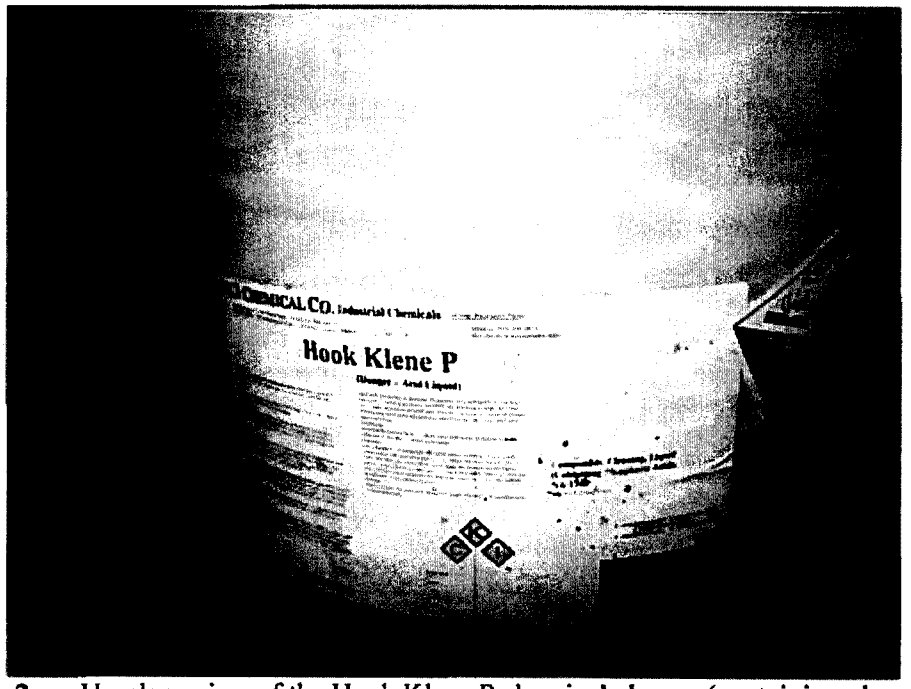
Attachment 1	Photograph Log
Attachment 2.A	CTI Wastewater Permit Requirement Evaluation
Attachment 2.B	Sludge Testing Results
Attachment 2.C	City of Rome Industrial Wastewater Questionnaire

Attachment 1 Photograph Log

Steel King Industries, Inc.

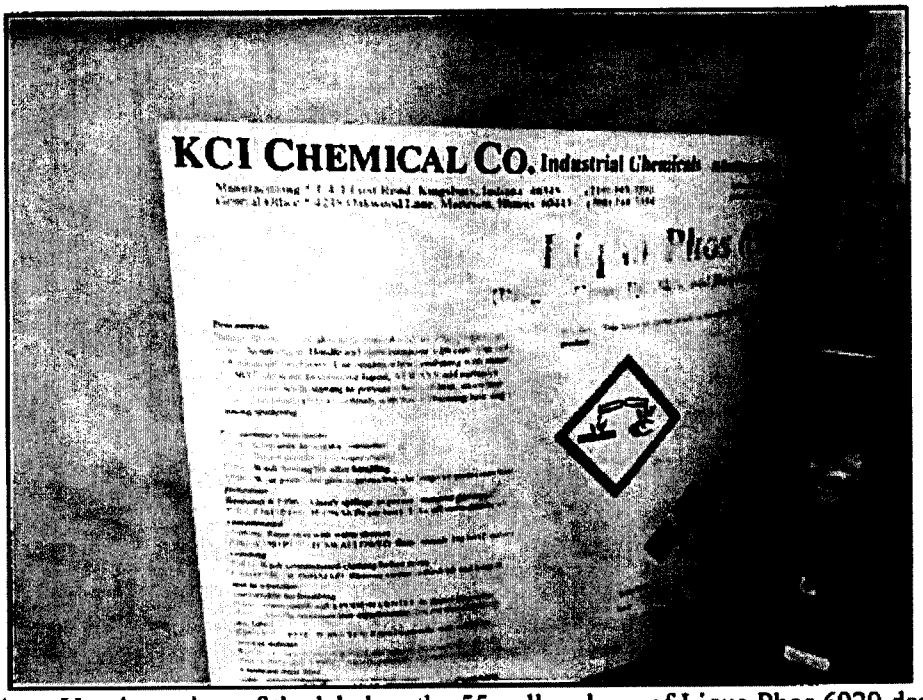


Photograph 1. The facility's tunnel washer used for the metal treatment process. The trench drain parallel to the washer conveys wastewater to a pit and to the City's POTW.

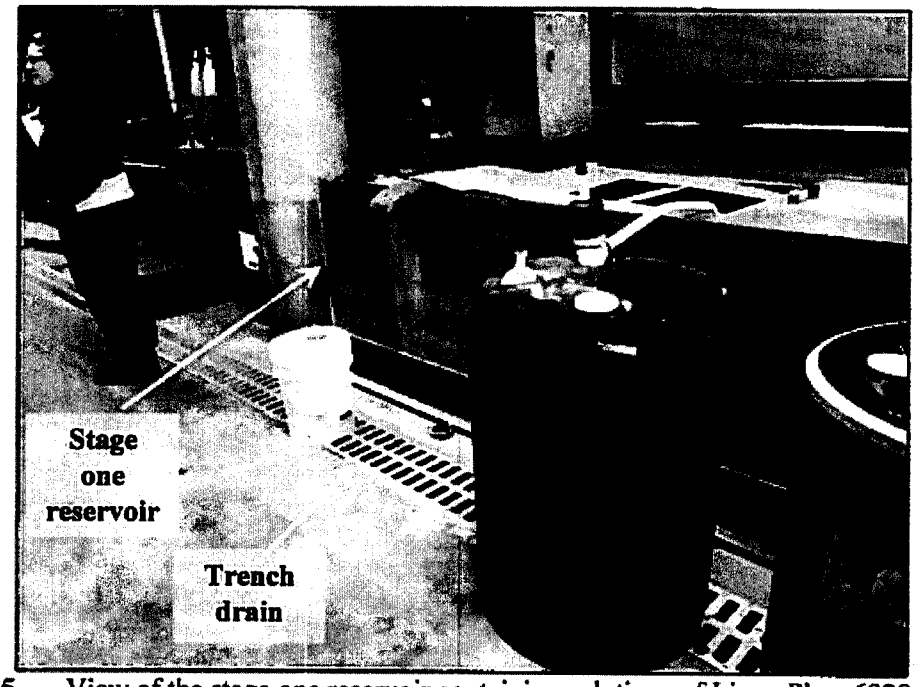


Photograph 2. Up-close view of the Hook Klene P chemical cleaner (containing phosphoric acid) used in the first stage of the metal treatment process.

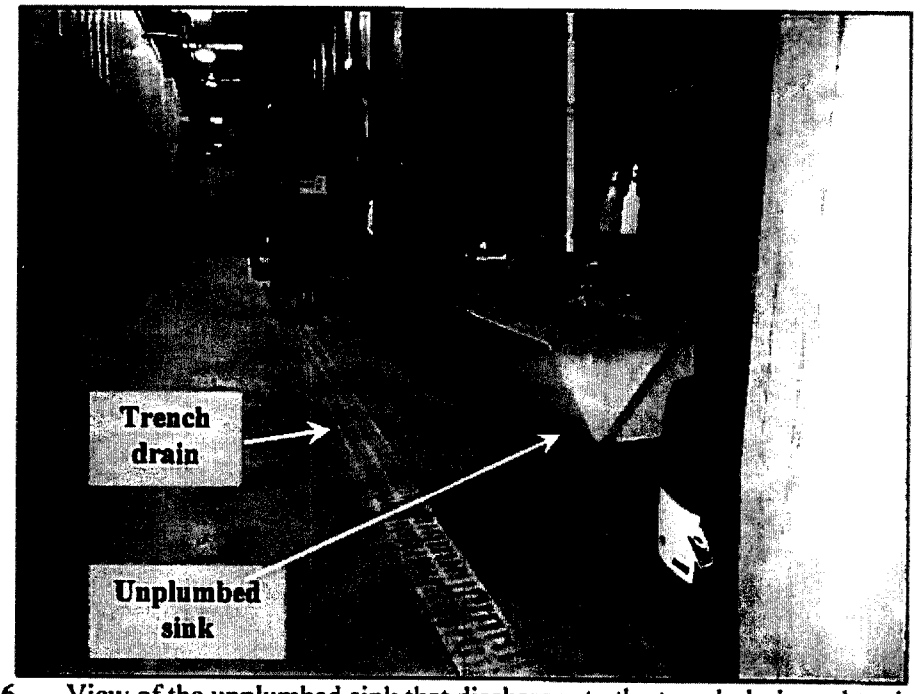
Photograph 3. View of the Liqua Phos 6929 chemical (containing phosphoric acid and nitric acid) used in the first stage of the metal treatment process. Note the vicinity of the 55-gallon drums to the trench drain and lack of secondary containment.



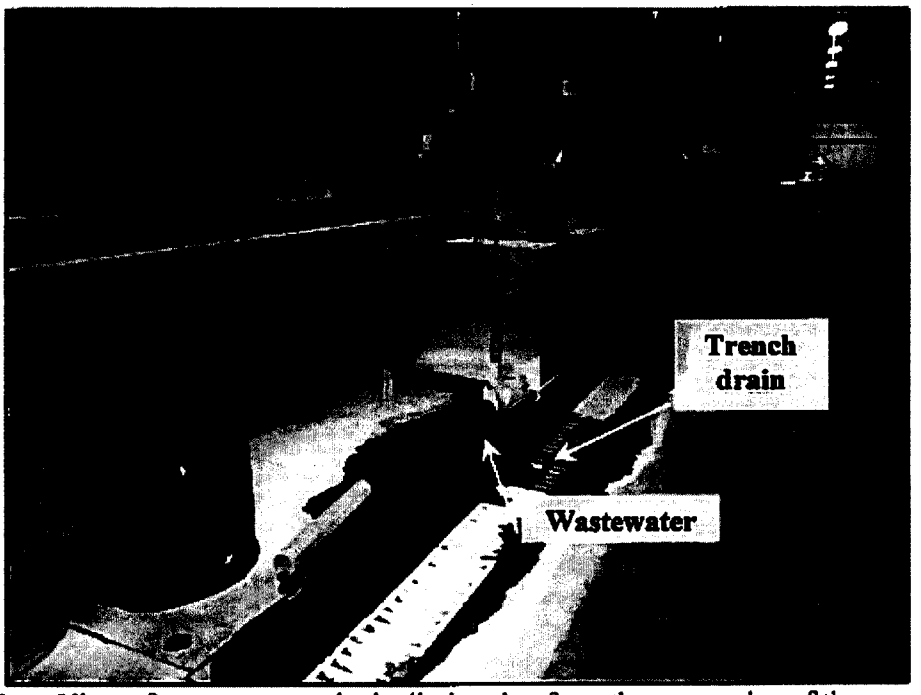
Photograph 4. Up-close view of the label on the 55-gallon drum of Liqua Phos 6929 depicted in Photograph 3.



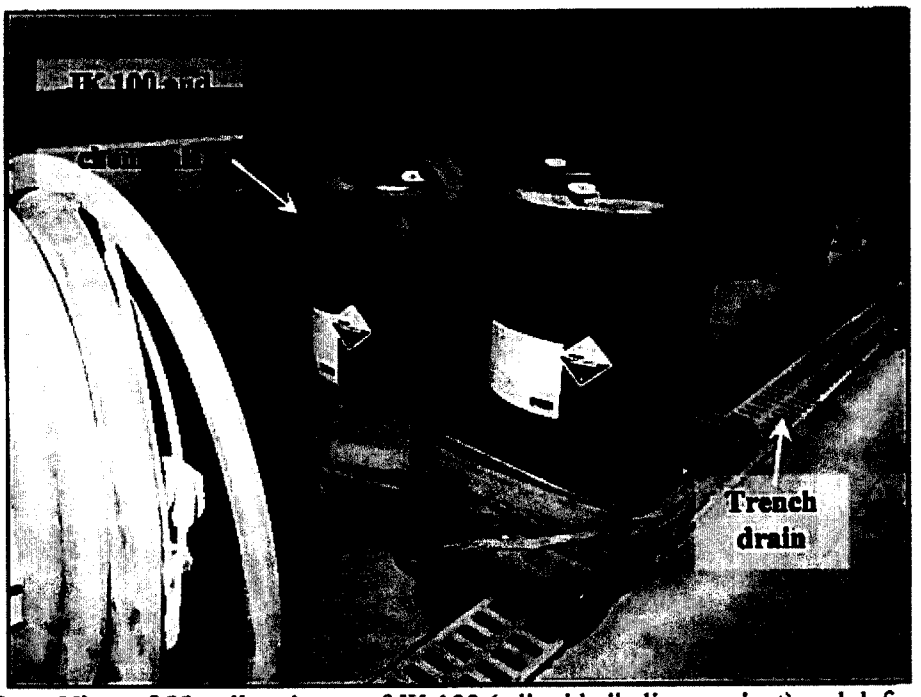
Photograph 5. View of the stage one reservoir containing solutions of Liqua Phos 6929 and Hook Klene P.



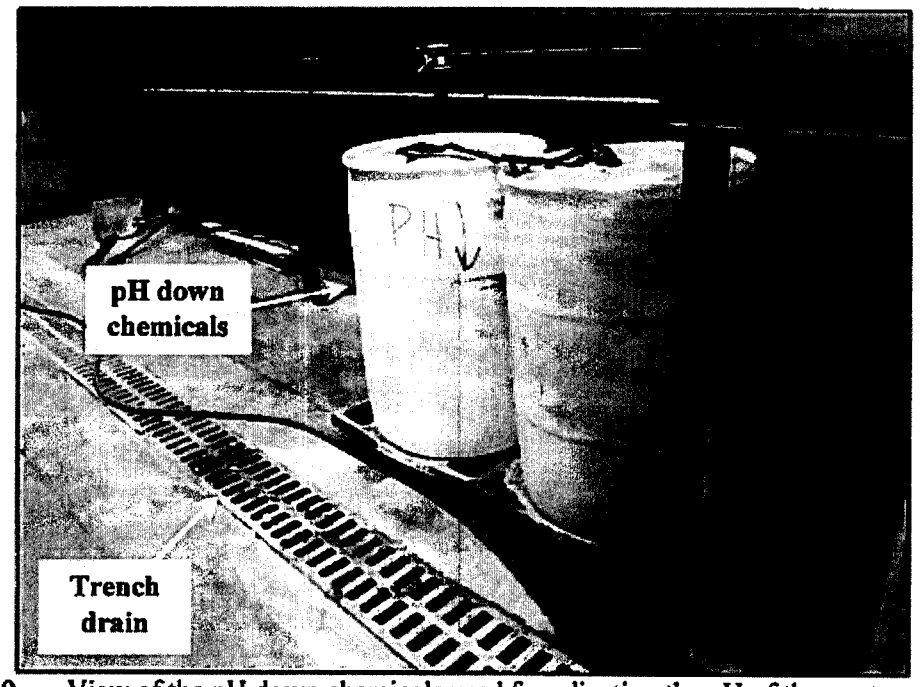
Photograph 6. View of the unplumbed sink that discharges to the trench drain and to the wastewater pit and ultimately to the City's POTW.



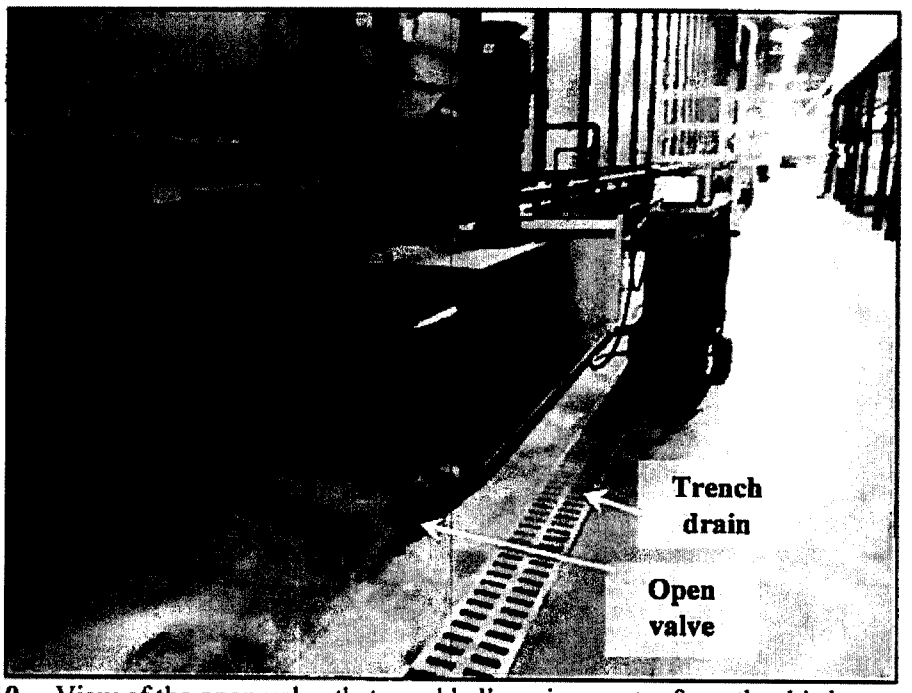
Photograph 7. View of wastewater actively discharging from the open valve of the second stage of the metal treatment process. Wastewater discharges to the trench drain, wastewater pit, and to the City's POTW.



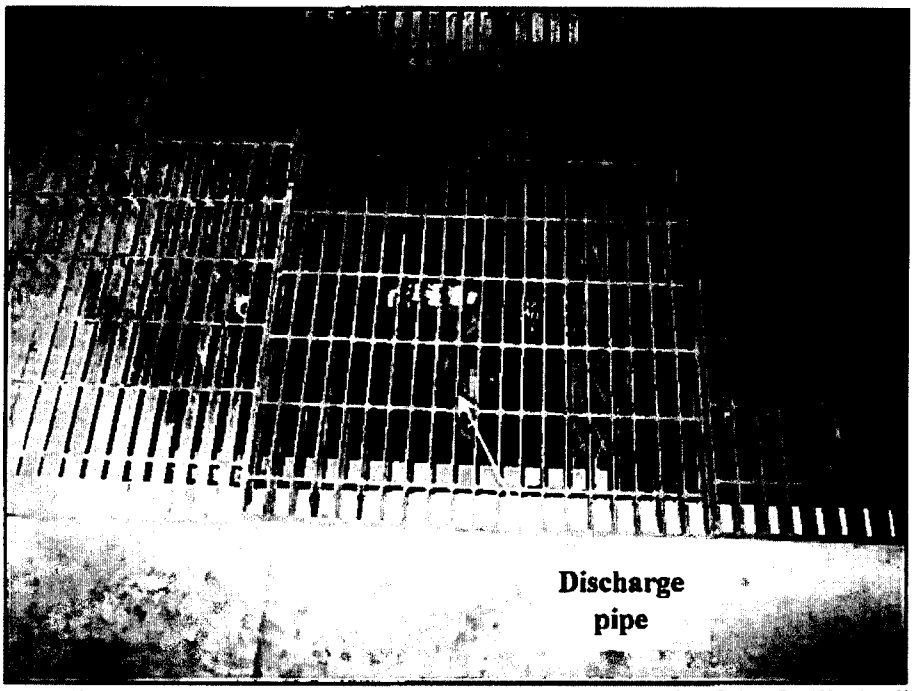
Photograph 8. View of 55-gallon drums of JK 100 (a liquid alkaline product) and defoamer. Note the vicinity of the 55-gallon drums to the trench drain and lack of secondary containment.



Photograph 9. View of the pH down chemicals used for adjusting the pH of the content in the reservoirs of the metal treatment system. Note the vicinity of the 55-gallon drums to the trench drain and lack of secondary containment.



Photograph 10. View of the open valve that would allow rinse water from the third stage of the metal treatment process to discharge to the trench drain, wastewater pit, and ultimately to the City's POTW.



Photograph 11. View within the grated covering of the wastewater pit of the facility's discharge location to the City's POTW. The exact method in which wastewater was discharged from the pit to the POTW was unclear. Note the accumulation of solids within the pit.

Attachment 2.A CTI Wastewater Permit Requirement Evaluation

Steel King Industries, Inc.

Conversion Technology Inc.
ENVIRONMENTAL CONSULTING ENGINEERS
2190 N. NORCROSS TUCKER ROAD, SUITE 202
NORCROSS, GEORGIA 30071
TEL: 770.263.8330 FAX: 770.263.8348
E-MAIL: CTI@CONVERSIONTECHNOLOGY.COM
WWW.CONVERSIONTECHNOLOGY.COM

JJH
3/2/16

June 30, 2010

Mr. John Cothran
Steel King Industries, Inc.
30 Floyd Industrial Blvd.
Rome, GA 30161

Dear Mr. Cothran:

Included is the Wastewater Permit Requirement Evaluation for your facility. Please keep this information on file.

PROCESS DESCRIPTION AND CURRENT STATUS

The Steel King Industries, Inc. facility in Rome, Georgia manufactures, and finishes metal shelving products. Steel King Industries, Inc.'s Standard Industrial Classification (SIC) codes are 2542 – Office and Store Fixtures, Partitions, Shelving, and Lockers, Except Wood; and 3499 - Fabricated Metal Products, Not Elsewhere Classified. Wastewater is generated from product washing activities conducted after the metal coating and painting finishing processes. Wastewater is stored in a containment area and discharged as a batch 1-2 times per year. Currently, Steel King Industries, Inc. does not have a wastewater permit.

CITY PERMIT REQIREMENT EVALUATION

City Of Rome Ordinances for Sewer Use

Steel King Industries, Inc. is located in Rome, Georgia. The city sets forth uniform requirements for contributors into the wastewater collection and treatment system and enables the city to comply with all applicable state and federal laws required by the Clean Water Act of 1977, amendments to this Act, and the general pretreatment regulations (40 CFR Part 403). The requirements for wastewater discharges to a sewer are as follows:

No person shall discharge or cause to be discharged any stormwater, surface water, groundwater, roof runoff, subsurface drainage, uncontaminated cooling water, or unpolluted industrial process waters to any sanitary sewer. All wastewaters shall be discharged to a sanitary sewer or treated by the generator and discharged to a natural stream under the conditions permitted by an NPDES permit issued by the state environmental protection division. Stormwater and all other unpolluted drainage shall be discharged to such sewers as are specifically designated as combined sewers or storm sewers, or to a natural outlet approved by the city manager. Industrial cooling water or unpolluted process waters may be discharged, on approval of the city manager, to a storm sewer, combined sewer, or natural outlet. Approval by the city manager for discharge of unpolluted process waters to a natural outlet within the city limit is required in addition to the issuance of an NPDES permit by the state environmental protection division.

Image 1. Note that the Process Description and Current Status paragraph specifically mentions that the facility conducts coating operations.

(a) No person shall introduce or cause to be introduced into the sewage works any pollutant or wastewater which causes pass through or interference. These general prohibitions apply to all users of the sewage works whether or not they are subject to categorical pretreatment standards or any other national, state, or local pretreatment standards or requirements.
(b) No user shall introduce or cause to be introduced into the sewage works the following pollutants, substances, or wastewater:
(1) Pollutants which create a fire or explosive hazard in the sewage works, including, but not limited to, wastestreams with a closed-cup flashpoint of less than 140 degrees Fahrenheit (60 degrees Celsius) using test methods specified in 40 CFR 261.21;
(2) 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 with the sewage works;
(3) Any water or wastes having a pH lower than 5.5 or greater than 12.0 or having any other corrosive property capable of causing damage or hazard to structures, equipment and personnel of the sewage works;
(4) Solids or viscous substances in quantities or of such size capable of causing obstruction to the flow in sewers or resulting in interference;
(5) Wastewater having a temperature greater than 150 degrees Fahrenheit (65 degrees Celsius), or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104 degrees Fahrenheit (40 degrees Celsius);
(6) Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass through;
(7) Pollutants which result in the presence of toxic gases, vapors, or fumes within the sewage works in a quantity that may cause acute worker health and safety problems;
(8) Trucked or hauled pollutants, except at discharge points designated by the superintendent in accordance with section 22-201 or this article.

(a) No person shall discharge or cause to be discharged the following described substances, materials, waters or wastes if it appears likely, in the opinion of the city manager, that such wastes can harm the sewers, sewage treatment process, or equipment, have an adverse effect on the receiving stream, or otherwise endanger life, limb, or public property or constitute a nuisance. In forming his opinion as to the acceptability of these wastes, the city manager shall give consideration to such factors as the quantities of subject wastes in relation to flows and velocities in the sewers, materials of construction of the sewers, nature of the sewage treatment process, capacity of the sewage treatment plant, degree of treatability of wastes in the sewage treatment plant, and other pertinent factors.
(b) The substances prohibited are:

(1) 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.
(2) Any water or waste containing fats, wax, grease, or oils, whether emulsified or not, in excess of 100 mg/l or containing substances which may solidify or become viscous at temperatures between 32 and 150 degrees Fahrenheit (zero to 65 degrees Celsius).
(3) Any garbage that has not been properly shredded. The installation and operation of any garbage grinder equipped with a motor of three-fourths horsepower or greater shall be subject to the review and approval of the city manager.

Image 2. Page 2 of 18

(4) Any waters or wastes containing strong acid, iron pickling wastes, or concentrated plating solutions, whether neutralized or not.
(5) Any waters or wastes containing iron, other objectionable or toxic substances, or wastes exerting an excessive chlorine requirement, to such degree that any such material received in the composite sewage at the sewage treatment works exceeds the limits established by the city manager for such materials.
(6) Any waters or wastes containing phenols or other taste- or odor-producing substances in such concentrations exceeding limits which may be established by the city manager as necessary, after treatment of the composite sewage, to meet the requirements of state, federal, or other public agencies or jurisdiction for such discharge to the receiving waters.
(7) Any radioactive wastes or isotopes of such halflife concentration as may exceed limits established by the city manager in compliance with applicable state or federal regulations.
(8) Any waters or wastes having a pH that will cause the pH of the waste entering the sewage treatment plant at any time to be in excess of 9.0.
(9) Materials which exert or cause:

a. Unusual concentrations of inert suspended solids (such as, but not limited to, fuller's earth, any textile fibers, lime slurries, and lime residues) or of dissolved solids (such as, but not limited to, sodium chloride and sodium sulfate).
b. Excessive discoloration (such as, but not limited to, dye wastes and vegetable tanning solutions).
c. Unusual BOD, chemical oxygen demand, or chlorine requirements in such quantities as to constitute a significant load on the sewage treatment works.
d. Unusual volume of flow or concentration of wastes constituting slugs.

(10) Waters or wastes containing substances which are not amenable to treatment or reduction by the sewage treatment processes employed or are amenable to treatment only to such degree that the sewage treatment plant effluent cannot meet the requirements of other agencies having jurisdiction over discharge to the receiving waters.
(11) Sludges, screenings, or other residues from the pretreatment of industrial wastes.
(12) Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail a toxicity test.
(13) Detergents, surface-active agents, or other substance which may cause excessive foaming in the sewage works.

The pollutant limits listed in Table 1 on the next page are based on treatment plant design specifications and are established to protect against pass through and interference. User discharge concentrations apply at the point where the industrial waste is discharged to the sewage works. No person shall discharge wastewater containing in excess of the maximum allowable discharge limits listed in Table 1.

City Wastewater Discharge Permit

All significant industrial users connected to, proposing to connect to, or otherwise contributing to the sewage works shall obtain a wastewater discharge permit. Proposed new significant users shall apply at least 90 days prior to connection to the sewage works and shall obtain the permit prior to contributing to the system. The city manager may require other users to obtain wastewater permits as necessary to carry out the purposes of this article. *Significant industrial user* (SIU) means any industrial user who:

Image 3. Page 3 of 18

(1) Is subject to categorical pretreatment standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N;
(2) Contributes a process wastestream which makes up five percent or more of the average dry weather hydraulic or organic capacity of the sewage treatment plant;
(3) Has an average discharge flow of process wastewater (excluding sanitary, noncontact cooling and boiler blow-down wastewater) equal to or greater than 25,000 gallons per workday;
(4) Discharges a wastewater containing any substance defined as a toxic or priority pollutant by the Environmental Protection Agency; or
(5) Is designed by the city on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement.

Sewer Use Evaluation

Based on its industrial processes, it is assumed that Steel King Industries, Inc. will not discharge any explosive materials or flammable fuels or oils. Steel King Industries, Inc. does not discharge any radioactive waste or any substances prohibited by the City of Rome, Georgia. In order to be certain of the pollutant discharges from Steel King Industries, Inc., grab samples of wastewater discharges were tested for pollutant levels. The samples were taken on June 7, 2010. The pollutant levels were analyzed, and the results proved that the pollutant levels in the wastewater at Steel King Industries, Inc. are well below the pretreatment limits for the City of Rome. Cyanide, PCB, Sufate, and Phenols were not tested because these parameters were known not to be present based on Steel King Industries, Inc.'s industrial processes. The pH of the sample was measured to be 7.4. The sampling results can be found in the Appendix. A summary of the sampling results is shown in Table 1.

TABLE 1: City User Discharge Limits and Tested Pollutant levels

Pollutant	User Discharge Limit (mg/L)	Tested pollutant Level (mg/L)
Arsenic	0.07	<0.030
Biochemical oxygen demand	350	48.0
Cadmium	0.11	<0.010
Chromium (total)	2.49	<0.010
Copper	0.61	0.141
Lead	0.78	<0.025
Mercury	0.009	<0.0005
Nickel	0.36	0.062
Selenium	0.0	<0.040
Silver	1.49	<0.010
Total suspended solids	200	17
Zinc	0.77	0.025

Image 4. Page 4 of 18. Note the requirement for a City permit includes categorical users.

As long as Steel King Industries, Inc. discharges less than 25,000 gallons of process wastewater per day, Steel King Industries, Inc. is not subject to a City Wastewater Permit. Steel King Industries, Inc. is not subject to categorical pretreatment standard, to be addressed in the next section. Therefore, Steel King Industries, Inc. is not subject to a wastewater permit.

NATIONAL PRETREATMENT REQIREMENT EVALUATION

National Pretreatment Standard

On September 21, 1998, the U.S. Environmental Protection Agency (EPA) promulgated final effluent limitations guidelines and standards under the Clean Water Act (CWA). These regulations amended existing effluent limitations guidelines and standards codified at 40 Code of Federal Regulations (CFR) Part 439.

The CWA requires EPA to promulgate nationally applicable pretreatment standards that restrict pollutant discharges from facilities that discharge wastewater indirectly through sewers flowing to publicly-owned treatment works (POTWs). National pretreatment standards are established for those pollutants in wastewater from indirect dischargers that may pass through, interfere with, or are otherwise incompatible with POTW operations. Generally, pretreatment standards are designed to ensure that wastewaters from direct and indirect industrial dischargers are subject to similar levels of treatment. In addition, all POTWs that must develop local pretreatment programs are required to implement specific local treatment limits applicable to their industrial indirect dischargers to prevent pass through and interference and to prevent the introduction into POTWs of certain pollutants (e.g., pollutants that create a fire or explosion hazard, corrosion or pollutants that result in toxic gases that may cause acute worker health or safety problems). All other POTWs must establish local limits to prevent pass through or interference to ensure compliance with the POTW's NPDES permit or sewage sludge uses. (See 40 CFR 403.5). CWA Section 402(b)(8) requires that permits for certain POTWs receiving pollutants from significant industrial sources subject to pretreatment standards under CWA Section 307(b) must establish a pretreatment program to ensure compliance with these standards. EPA has published regulations to define the requirements of this POTW pretreatment control program.

National Pretreatment Standard Evaluation

Based on the SIC codes 2542 and 3499, Steel King Industries, Inc. is not subject to the National Pretreatment Standard.

CONCLUSION

Based on the information provided from the sampling results in the Appendix and the previous evaluations, Steel King Industries, Inc. is not subject to any wastewater permit. The results of the sampling prove that Steel King Industries, Inc. discharges wastewater within the pollutant limits of the City of Rome, Georgia and does not contribute any substances prohibited by the Sewer Use Ordinance. Steel King Industries, Inc. is not subject to a SIU permit requirement as long as it does not discharge more than 25,000 gallons of process water per day. Steel King Industries, Inc. is also not covered by a National Categorical Pretreatment Standard.

Image 5. Page 5 of 18. Note the incorrect basis for determining categorical status.

If you have any questions concerning this evaluation, please do not hesitate to call me at (770) 263-6330.

Sincerely,

Jeff Pool
Environmental Engineer

Z:\SK\WW\SK WWE_REPORT.doc:jp1

CTI

Image 6. Page 6 of 18.

APPENDIX

Image 7. Page 7 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Laboratory Report

Prepared For:

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross, GA 30071

Attention: Mr. Jeff Pool

Report Number: ATF0219
June 17, 2010
Project: SK-WW
Project #:[none]

We appreciate the opportunity to provide the analytical support for your project. The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Approved:

Elizabeth Bryant
Project Manager

This report may not be reproduced, except in full, without written approval from Analytical Services, Inc.
Analytical Services, Inc. certifies that the following analytical results meet all requirements of the National Environmental Laboratory Accreditation Conference(NELAC).
All test results relate only to the samples analyzed.

Image 8. Page 8 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Stage 2	ATF0219-01	Waste Water	06/07/10 12:30	06/07/10 16:53

Image 9. Page 9 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

Report No.: ATF0219
Client ID: Stage 2
Date/Time Sampled: 6/7/2010 12:30:00PM
Matrix: Waste Water

Project: SK-WW
Lab Number ID: ATF0219-01
Date/Time Received: 6/7/2010 4:53:00PM

Analyte	Result	RL	Units	Method	Qual.	DF	Preparation Date	Analytical Date	Batch	Init.
General Chemistry										
Biochemical Oxygen Demand	48.0	10.0	mg/L	SM 5210 B		1	6/08/10 12:00	6/13/10 15:15	0060230	JCM
Total Suspended Solids	17	5	mg/L	SM 2540 D		1	6/14/10 9:25	6/14/10 9:25	0060295	MZP
Metals, Total										
Arsenic	ND	0.030	mg/L	EPA 200.7		1	6/11/10 8:45	6/14/10 17:49	0060325	FBS
Cadmium	ND	0.010	mg/L	EPA 200.7		1	6/11/10 8:45	6/14/10 17:49	0060325	FBS
Chromium	ND	0.010	mg/L	EPA 200.7		1	6/11/10 8:45	6/14/10 17:49	0060325	FBS
Copper	0.141	0.020	mg/L	EPA 200.7		1	6/11/10 8:45	6/14/10 17:49	0060325	FBS
Lead	ND	0.025	mg/L	EPA 200.7		1	6/11/10 8:45	6/14/10 17:49	0060325	FBS
Nickel	0.062	0.020	mg/L	EPA 200.7		1	6/11/10 8:45	6/14/10 17:49	0060325	FBS
Selenium	ND	0.040	mg/L	EPA 200.7		1	6/11/10 8:45	6/14/10 17:49	0060325	FBS
Silver	ND	0.010	mg/L	EPA 200.7		1	6/11/10 8:45	6/14/10 17:49	0060325	FBS
Zinc	0.025	0.020	mg/L	EPA 200.7		1	6/11/10 8:45	6/14/10 17:49	0060325	FBS
Mercury	ND	0.0005	mg/L	EPA 245.1		1	6/08/10 9:50	6/08/10 14:40	0060192	CSW

Image 10. Page 10 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

Report No.: ATF0219

General Chemistry - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060230 - SM 5210 B										
Blank (0060230-BLK1)					Prepared: 06/08/10 Analyzed: 06/13/10					
Biochemical Oxygen Demand	ND	2.0	mg/L							
LCS (0060230-BS1)					Prepared: 06/08/10 Analyzed: 06/13/10					
Biochemical Oxygen Demand	211	2.0	mg/L	198.00		107	85-115			
Duplicate (0060230-DUP1)		Source: ATF0183-01			Prepared: 06/08/10 Analyzed: 06/13/10					
Biochemical Oxygen Demand	347	10.0	mg/L		378			9	10	
Batch 0060296 - SM 2540 D										
Blank (0060296-BLK1)					Prepared & Analyzed: 06/14/10					
Total Suspended Solids	ND	5	mg/L							
LCS (0060296-BS1)					Prepared & Analyzed: 06/14/10					
Total Suspended Solids	93	10	mg/L	100.00		93	88-104			
Duplicate (0060296-DUP1)		Source: ATF0249-01			Prepared & Analyzed: 06/14/10					
Total Suspended Solids	140	12	mg/L		144			3	27	
Duplicate (0060296-DUP2)		Source: ATF0283-06			Prepared & Analyzed: 06/14/10					
Total Suspended Solids	2	5	mg/L		3			40	27	QR-03

Image 11. Page 11 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

Report No.: ATF0219

Metals, Total - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060192 - EPA 245.1										
Blank (0060192-BLK1)					Prepared & Analyzed: 06/08/10					
Mercury	ND	0.0005	mg/L							
LCS (0060192-BS1)					Prepared & Analyzed: 06/08/10					
Mercury	0.0024	0.0005	mg/L	2.5000E-3		96	85-115			
Duplicate (0060192-DUP1)		Source: ATF0192-02			Prepared & Analyzed: 06/08/10					
Mercury	ND	0.0005	mg/L		ND				20	
Matrix Spike (0060192-MS1)		Source: ATF0157-01			Prepared & Analyzed: 06/08/10					
Mercury	0.0025	0.0005	mg/L	2.5000E-3	ND	98	70-130			
Post Spike (0060192-PS1)		Source: ATF0157-01			Prepared & Analyzed: 06/08/10					
Mercury	1.81		ug/L	1.6667	0.0616	93	85-115			
Batch 0060325 - EPA 200.7										
Blank (0060325-BLK1)					Prepared & Analyzed: 06/11/10					
Arsenic	ND	0.030	mg/L							
Cadmium	ND	0.010	mg/L							
Chromium	ND	0.010	mg/L							
Copper	ND	0.020	mg/L							
Lead	ND	0.025	mg/L							
Nickel	ND	0.020	mg/L							
Selenium	ND	0.040	mg/L							
Silver	ND	0.010	mg/L							
Zinc	ND	0.020	mg/L							

Image 12. Page 12 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

Report No.: ATF0219

Metals, Total - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060325 - EPA 200.7										
LCS (0060325-BS1)					Prepared & Analyzed: 06/11/10					
Arsenic	1.0	0.030	mg/L	1.0000		101	85-115			
Cadmium	1.0	0.010	mg/L	1.0000		102	85-115			
Chromium	1.0	0.010	mg/L	1.0000		101	85-115			
Copper	1.0	0.020	mg/L	1.0000		102	85-115			
Lead	1.0	0.025	mg/L	1.0000		102	85-115			
Nickel	1.0	0.020	mg/L	1.0000		102	85-115			
Selenium	1.0	0.040	mg/L	1.0000		102	85-115			
Silver	1.0	0.010	mg/L	1.0000		102	85-115			
Zinc	1.0	0.020	mg/L	1.0000		102	85-115			
Duplicate (0060325-DUP1)		Source: ATF0440-02			Prepared & Analyzed: 06/11/10					
Arsenic	ND	0.030	mg/L		0.004				20	
Cadmium	ND	0.010	mg/L		ND				20	
Chromium	0.002	0.010	mg/L		0.002			8	20	
Copper	0.024	0.020	mg/L		0.023			3	20	
Lead	ND	0.025	mg/L		ND				20	
Nickel	0.21	0.020	mg/L		0.21			0.1	20	
Selenium	0.010	0.040	mg/L		ND				20	
Silver	ND	0.010	mg/L		ND				20	
Zinc	0.072	0.020	mg/L		0.070			4	20	
Matrix Spike (0060325-MS1)		Source: ATF0164-01			Prepared & Analyzed: 06/11/10					
Arsenic	1.1	0.030	mg/L	1.0000	0.004	108	70-130			
Cadmium	1.0	0.010	mg/L	1.0000	0.001	101	70-130			
Chromium	1.7	0.010	mg/L	1.0000	0.73	98	70-130			
Copper	1.3	0.020	mg/L	1.0000	0.29	103	70-130			
Lead	1.0	0.025	mg/L	1.0000	0.019	100	70-130			
Nickel	1.8	0.020	mg/L	1.0000	0.80	99	70-130			
Selenium	1.1	0.040	mg/L	1.0000	0.033	110	70-130			
Silver	1.2	0.010	mg/L	1.0000	0.051	110	70-130			
Zinc	1.3	0.020	mg/L	1.0000	0.26	107	70-130			

Image 13. Page 13 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr Jeff Pool

June 17, 2010

Report No.: ATF0219

Metals, Total - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060325 - EPA 200.7										
Post Spike (0060325-PS1)		**Source: ATF0164-01**			Prepared & Analyzed: 06/11/10					
Arsenic	1.1		mg/L	1.0000	0.004	109	85-115			
Cadmium	1.0		mg/L	1.0000	0.001	102	85-115			
Chromium	1.7		mg/L	1.0000	0.73	99	85-115			
Copper	1.3		mg/L	1.0000	0.29	103	85-115			
Lead	1.0		mg/L	1.0000	0.019	102	85-115			
Nickel	1.8		mg/L	1.0000	0.80	100	85-115			
Selenium	1.2		mg/L	1.0000	0.033	113	85-115			
Silver	1.2		mg/L	1.0000	0.051	110	85-115			
Zinc	1.3		mg/L	1.0000	0.26	108	85-115			

Image 14. Page 14 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

Laboratory Certifications

Code	Description	Number	Expires
LA	Louisiana	02069	06/30/2010
NC	North Carolina	381	12/31/2010
NELAC	NELAC (Non-Potable Water, Solids)	E87315	06/30/2010
SC	South Carolina	98011001	06/30/2010
TX	Texas	T104704397-08-TX	03/31/2011

Image 15. Page 15 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

Legend

Definition of Laboratory Terms

ND - None Detected at the Reporting Limit
TIC - Tentatively Identified Compound
CFU - Colony Forming Units
SOP - Method run per ASI Standard Operating Procedure
RL - Reporting Limit
DF - Dilution Factor
***** - Analyte not included in the NELAC list of certified analytes.

Sample Information

N-Nitrosodiphenylamine breaks down to diphenylamine in the GCMS; both analytes are reported as N-Nitrososdiphenylamine. ASI is not NELAC certified for diphenylamine.

Phthalic acid and phthalic anhydride are reported as dimethyl phthalate

Maleic acid and maleic anhydride are reported as dimethyl malate

1,2-Diphenylhydrazine breaks down to azobenzene in the GCMS; both analytes are reported as azobenzene

Definition of Qualifiers

QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to suspected matrix interference and/or non-homogeneous sample matrix.

Note: Unless otherwise noted, all results are reported on an as received basis.

Image 16. Page 16 of 18.

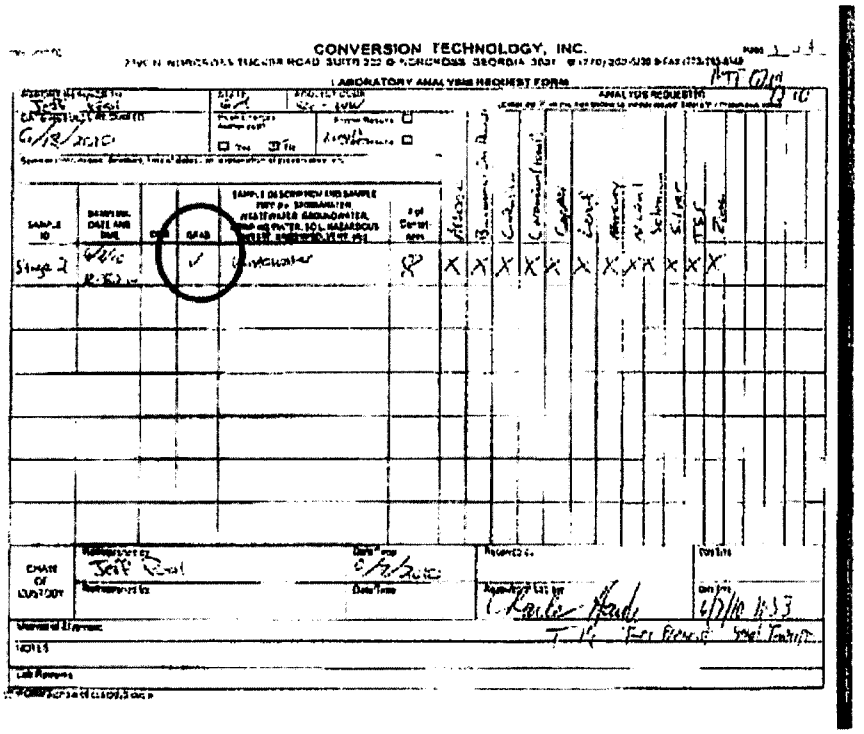
ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010



Page 10 of 10

Image 17. Page 17 of 18. Note that a grab sample was collected, which is not compliant with categorical monitoring requirements in 40 C.F.R. 403.12(g) for sampling metals.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

LOG-IN CHECKLIST **Printed: 6/17/2010 3:53:51PM**

Attn: Mr. Jeff Pool

Client: Conversion Technology Inc.
Project: SK-WW
Date Received: 06/07/10 16:53

Work Order: ATF0219
Logged In By: Charles Hawks

OBSERVATIONS

#Samples: 1 **#Containers:** 8

Minimum Temp(C): 1.0 **Maximum Temp(C):** 1.0 **Custody Seal(s) Used:** Yes

CHECKLIST ITEMS

COC included with Samples	YES
Sample Container(s) Intact	YES
Chain of Custody Complete	YES
Sample Container(s) Match COC	YES
Custody seal Intact	YES
Temperature in Compliance	YES
Sufficient Sample Volume for Analysis	YES
Zero Headspace Maintained for VOA Analyses	YES
Samples labeled preserved (If Applicable)	YES
Samples received within Allowable Hold Times	YES
Samples Received on Ice	YES
Preservation Confirmed	YES

Comments:

Page 1 of 1

Image 18. Page 18 of 18.

Attachment 2.B Wastewater Sludge Testing Results

Steel King Industries, Inc.

Conversion Technology Inc.
ENVIRONMENTAL CONSULTING ENGINEERS
2190 N. NORCROSS TUCKER ROAD, SUITE 202
NORCROSS, GEORGIA 30071
TEL: 770.263.6330 FAX: 770.263.8348
E-MAIL: CTI@CONVERSIONTECHNOLOGY.COM
WWW.CONVERSIONTECHNOLOGY.COM

June 30, 2010

KJH
3/02/16

Mr. John Cothran
Steel King Industries, Inc.
30 Floyd Industrial Blvd.
Rome, GA 30161

Dear Mr. Cothran,

Attached please find the results of the analytical testing of the solid sludge from the washing process collected on June 7, 2010. The sludge was analyzed under the Toxicity Characteristic Leaching Procedure (TCLP) for metals. All results are below the regulatory limits; therefore the sludge does not meet the definition of a hazardous waste as defined by 40 CFR Part 261, Subpart C. The waste is thus classified as a solid waste and the facility may continue to dispose of the sludge as such. Please keep a copy of this report and the laboratory analysis for your records.

If you have any questions or comments, please do not hesitate to call me at (770) 263-6330 ext. 116.

Sincerely,

Jeff Davis, PE
Sr. Environmental Engineer

Enclosure

Z:\SKITST\SK_TST_LTR01.doc;jd

Image 1. Cover page providing the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Laboratory Report

Prepared For:

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross, GA 30071

Attention: Mr. Jeff Pool

Report Number: ATF0218
June 14, 2010
Project: SK-TST
Project #:[none]

We appreciate the opportunity to provide the analytical support for your project. The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Approved:

Elizabeth Bryant
Project Manager

This report may not be reproduced, except in full, without written approval from Analytical Services, Inc.
Analytical Services, Inc. certifies that the following analytical results meet all requirements of the National Environmental Laboratory Accreditation Conference(NELAC).
All test results relate only to the samples analyzed.

Image 2. Page 1 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Sludge	ATF0218-01	Sludge	06/07/10 12:30	06/07/10 16:53

Page 2 of 9

Image 3. Page 2 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Project: SK-TBT
Client ID: Sludge
Lab Number ID: ATF0218-01
Matrix: Sludge

Report No.: ATF0218
Date/Time Sampled: 6/7/2010 12:30:00PM
Date/Time Received: 6/7/2010 4:53:00PM

Analyte	Result	RL	TCLP Limit	Units	Method	Qual.	DF	Prep Date	Analysis Date	Batch	Init.
Metals, TCLP											
Mercury	ND	0.0050	0.2	mg/L	EPA 7470A		1	06/10/10 13:10	06/11/10 12:37	0060310	CSW
Arsenic	ND	2.50	5	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Barium	0.19	0.10	100	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Cadmium	ND	0.01	1	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Chromium	ND	0.01	5	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Lead	ND	0.10	5	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Selenium	ND	0.50	1	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Silver	ND	0.01	5	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS

Image 4. Page 3 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Report No.: ATF0218

Metals, TCLP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060309 - EPA 3010A										
Blank (0060309-BLK1)						Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	ND	2.50	mg/L							
Barium	ND	0.10	mg/L							
Cadmium	ND	0.01	mg/L							
Chromium	ND	0.01	mg/L							
Lead	ND	0.10	mg/L							
Selenium	ND	0.50	mg/L							
Silver	ND	0.01	mg/L							
Blank (0060309-BLK2)						Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	ND	2.50	mg/L							
Barium	ND	0.10	mg/L							
Cadmium	ND	0.01	mg/L							
Chromium	ND	0.01	mg/L							
Lead	ND	0.10	mg/L							
Selenium	ND	0.50	mg/L							
Silver	ND	0.01	mg/L							
LCS (0060309-BS1)						Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	1.07	2.50	mg/L	1.0000		107	80-120			
Barium	1.03	0.10	mg/L	1.0000		103	80-120			
Cadmium	1.02	0.01	mg/L	1.0000		102	80-120			
Chromium	1.03	0.01	mg/L	1.0000		103	80-120			
Lead	1.02	0.10	mg/L	1.0000		102	80-120			
Selenium	1.11	0.50	mg/L	1.0000		111	80-120			
Silver	1.08	0.01	mg/L	1.0000		108	80-120			
Matrix Spike (0060309-MS1)		Source: ATF0231-01				Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	1.08	2.50	mg/L	1.0000	ND	108	75-125			
Barium	1.11	0.10	mg/L	1.0000	ND	111	75-125			
Cadmium	1.01	0.01	mg/L	1.0000	ND	101	75-125			
Chromium	1.03	0.01	mg/L	1.0000	0.003	103	75-125			
Lead	1.01	0.10	mg/L	1.0000	ND	101	75-125			
Selenium	1.12	0.50	mg/L	1.0000	ND	112	75-125			
Silver	1.07	0.01	mg/L	1.0000	ND	107	75-125			

Image 5. Page 4 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Report No.: ATF0218

Metals, TCLP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060309 - EPA 3010A										
Matrix Spike Dup (0060309-MSD1)		Source: ATF0231-01				Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	1.09	2.50	mg/L	1.0000	ND	109	75-125	3	20	
Barium	1.14	0.10	mg/L	1.0000	ND	114	75-125	3	20	
Cadmium	1.04	0.01	mg/L	1.0000	ND	104	75-125	3	20	
Chromium	1.06	0.01	mg/L	1.0000	0.003	106	75-125	3	20	
Lead	1.04	0.10	mg/L	1.0000	ND	104	75-125	3	20	
Selenium	1.15	0.50	mg/L	1.0000	ND	115	75-125	3	20	
Silver	1.10	0.01	mg/L	1.0000	ND	110	75-125	3	20	
Post Spike (0060309-PS1)		Source: ATF0231-01				Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	1.09		mg/L	1.0000	ND	109	80-120			
Barium	1.14		mg/L	1.0000	ND	114	80-120			
Cadmium	1.04		mg/L	1.0000	ND	104	80-120			
Chromium	1.06		mg/L	1.0000	0.003	106	80-120			
Lead	1.04		mg/L	1.0000	ND	104	80-120			
Selenium	1.15		mg/L	1.0000	ND	115	80-120			
Silver	1.09		mg/L	1.0000	ND	109	80-120			
Batch 0060310 - EPA 7470A										
Blank (0060310-BLK1)						Prepared: 06/10/10 Analyzed: 06/11/10				
Mercury	ND	0.0050	mg/L							
Blank (0060310-BLK2)						Prepared: 06/10/10 Analyzed: 06/11/10				
Mercury	ND	0.0050	mg/L							
LCS (0060310-BS1)						Prepared: 06/10/10 Analyzed: 06/11/10				
Mercury	0.0179	0.0050	mg/L	0.016667		108	80-120			

Page 5 of 9

Image 6. Page 5 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Report No.: ATF0218

Metals, TCLP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060310 - EPA 7470A										
Matrix Spike (0060310-MS1)		Source: ATF0218-01				Prepared: 06/10/10		Analyzed: 06/11/10		
Mercury	0.0173	0.0050	mg/L	0.016667	ND	104	75-125			
Matrix Spike Dup (0060310-MSD1)		Source: ATF0218-01				Prepared: 06/10/10		Analyzed: 06/11/10		
Mercury	0.0173	0.0050	mg/L	0.016667	ND	104	75-125	0.03	20	
Post Spike (0060310-PS1)		Source: ATF0218-01				Prepared: 06/10/10		Analyzed: 06/11/10		
Mercury	1.77		ug/L	1.6667	-0.0015	106	80-120			

Image 7. Page 6 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Laboratory Certifications

Code	Description	Number	Expires
LA	Louisiana	02069	06/30/2010
NELAC	NELAC (Non-Potable Water, Solids)	E87315	06/30/2010
SC	South Carolina	98011001	06/30/2010
TX	Texas	T104704397-08-TX	03/31/2011

Image 8. Page 7 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Legend

Definition of Laboratory Terms

ND - None Detected at the Reporting Limit
TIC - Tentatively Identified Compound
CFU - Colony Forming Units
SOP - Method run per ASI Standard Operating Procedure
RL - Reporting Limit
DF - Dilution Factor
***** - Analyte not included in the NELAC list of certified analytes.

Sample Information

N-Nitrosodiphenylamine breaks down to diphenylamine in the GCMS; both analytes are reported as N-Nitrososdiphenylamine. ASI is not NELAC certified for N-Nitrososdiphenylamine.

Phthalic acid and phthalic anhydride are reported as dimethyl phthalate

Maleic acid and maleic anhydride are reported as dimethyl malate

1,2-Diphenylhydrazine breaks down to azobenzene in the GCMS; both analytes are reported as azobenzene

Definition of Qualifiers

Note: Unless otherwise noted, all results are reported on an as received basis.

Page 8 of 9

Image 9. Page 8 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

CONVERSION TECHNOLOGY, INC.
2190 N. NORCROSS TUCKER ROAD, SUITE 202 • NORCROSS, GEORGIA 30071 • (770) 263-5336 • FAX (770) 263-5340

LABORATORY ANALYSIS REQUEST FORM

Page 1 of 1

ATF0218

Sludge	6/7/2010 2:50 PM	✓	Sludge	3	

Page 9 of 9

Image 10. Page 9 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

Attachment 2.C City of Rome Industrial Wastewater Questionnaire

Steel King Industries, Inc.

KJH 3/2/10

John Bennett, *City Manager*
DEPARTMENT OF PUBLIC SERVICES
W. Kirk Milam, P.E., *Manager*
Water and Sewer Division
Leigh Ross, *Director*
Mike Hackett, *Asst Director*
Water Reclamation Facilities
Johnny C. Massingill, *Director*

October 11, 2010

Mike Adamczak
Steel King Industries, Inc.
30 Floyd Industrial Blvd.
Rome, Georgia 30161-9572

Re: Industrial Wastewater Questionnaire

Dear Mr. Adamczak:

Periodically, to update our records, The City of Rome sends out Industrial Wastewater Questionnaires. These questionnaires help determine which industries are Significant Industrial Users. Please complete this questionnaire and return to:

Anthony L. Abercrombie, Laboratory Supervisor
City of Rome Water Reclamation Facilities
212 Blacks Bluff Road
Rome, Georgia 30161-4610

If you have any questions, please call me at 706-236-4592.

Sincerely,

Anthony L. Abercrombie

Anthony L. Abercrombie
WRF Laboratory Supervisor
City of Rome, Georgia

cc: Leigh Ross, Director, Water and Sewer Division
Johnny Massingill, WRF Director

212 Blacks Bluff Road • Rome, Georgia 30161-4610
phone: 706/236-4591 • *fax*: 706/236-4594

Image 1. Cover page for the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

ROME
G·E·O·R·G·I·A

INDUSTRIAL WASTEWATER QUESTIONNAIRE
WATER & SEWER DIVISION

SECTION A
GENERAL INFORMATION

A1. Applicant Business Name Steel King Industries, Inc.

A2. Address of Premise Discharging Wastewater:

Street 30 Industrial Boulevard, Southeast

City Rome State GA Zip 30161

A3. Business Address:

Street or P.O. Box 2700 Chamber Street

City Stevens Point State WI Zip 54481

A4. Name and Title of Signing Official:

Name John Cothran Title Plant Manager

A5. Person to be contacted about this application:

Name John Cothran Title Plant Manager Phone 706-291-2222

A6. Person to be contacted in case of emergency:

Name John Cothran Day Phone 706-291-2222 Night Phone 706-853-9169

The information contained in this application is familiar to me and to the best of my knowledge and belief, such information is true, accurate, and complete.

Date 01/26/2011 Signature

Note to Signing Official: In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.13, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of information shall be governed by procedures specified in 40 CFR Part 2.

Image 2. Page 1 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION B
PRODUCT OR SERVICE INFORMATION

B1. Provide a brief narrative of manufacturing or service activity at premise address (include principal raw materials, catalysts, intermediates, products):

Steel King Industries, Inc. purchases HR structural steel in various shapes to be used in the fabrication of industrial warehouse rack systems. The fabricated rack components are cleaned in a three stage washer and then powder coated. The cleaner is manufactured by KCI Chemicals. The mild phosphoric acid is used in a 1.5% solution and will be neutralized to a 6-7 pH prior to discharge.

B2. List the Standard Industrial Classification (SIC) Codes for principle product or services:

PRODUCTS OR SERVICES	SIC CODE (4 DIGIT)	PERCENTAGE OF PRODUCTION
Fabricated Metal Products	2542	100%

B3. Substances Discharged – Give common and technical names of each raw material and product that may be discharged to the sewer. Briefly describe the physical and chemical properties of each substance and product:

COMMON / TECHNICAL	PHYSICAL AND CHEMICAL PROPERTIES
KCI Liqua Phos 6929	Liquid, 5% Nitric Acid and 20% Phosphoric Acid
Hooke Kleen P	Liquid, 40% Phosphoric Acid

B4. What potentially hazardous, corrosive, flammable, explosive, or toxic substances are handled at your plant? Identify those that could possibly be discharged to a sewer.

Heath Hazards - pH UP, pH Down, Liqua Phos, Hook Klene P
Flammable - Mighty Lube Type ML lubricants, Powder Coat Paints

pH UP, pH Down, Liqua Phos, Hook Klene P, and lubricants have the possibility of being discharged.

Image 3. Page 2 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome. Note that the both solutions contain phosphoric acid.

SECTION B (Continued)
PRODUCT OR SERVICE INFORMATION

B5. Describe all wastewater generating operations (including processes and clean-ups):

During normal operations, 3-5 gpm of freshwater rinse will be continually discharged. Every 6-8 months the washer will be drained and cleaned. The contents of the washer (4,000 gallons of 1.5% phosphoric acid solution) and two rinse tanks (2,400 gallons total) will be drained into a closure. This diluted solution will be neutralized and released to the sewer.

B6. Identify information entitled to protection as a trade secret:

Section	Reason
N/A	N/A

SECTION C
PLANT OPERATIONAL CHARACTERISTICS

C1. Are major processes batch or continuous? Continuous

If batch, average number of batches per 24 hour day: N/A

C2. Variation of Operation

Indicate whether the business activity is:

a. X Continuous through the year, or
___ Seasonal – Circle the months of the year during which operations occur:

JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC

Peak month(s) of operation is (are): N/A

b. ___ Continuous throughout the week, or
X Circle the days of the week during which operations occur:

SUN MON TUE WED THU FRI SAT

Peak day(s) of operation is (are): N/A

c. X Are there any scheduled shutdowns? Yes X No ___

When and Why? Christmas/New Year's Break

Image 4. Page 3 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION C (Continued)
PLANT OPERATIONAL CHARACTERISTICS

C3. Wastewater Discharge Periods

a. Discharge occurs daily: From 6 A.M. to 11 P.M.
Circle the days of the week that discharge occurs:

SUN MON TUE WED THU FRI SAT

Peak day(s) of discharge is (are): N/A

b. Clean-up discharge daily: From 6 A.M. to 2:30 P.M.
Circle the days of the week that discharge occurs due to clean-up:

SUN MON TUE WED THU FRI SAT

C4. Shift Information:
Total Number of Employees: 115

Number of Employees per shift (Office / Production):

	DAY	EVENING	NIGHT
WEEKDAY	9 / 65	1 / 50	/
SATURDAY	9 / 65	1 / 50	/
SUNDAY	9 / 65	1 / 50	/
SEASONAL	/	/	/

Shift Hours:

	DAY	EVENING	NIGHT
WEEKDAY	6 A.M. to 2:30 P.M.	2:30 to 11 P.M.	to
SATURDAY	6 A.M. to 2:30 P.M.	2:30 to 11 P.M.	to
SUNDAY	6 A.M. to 2:30 P.M.	2:30 to 11 P.M.	to
SEASONAL	to	to	to

C5. Describe any wastewater treatment equipment or processes in use (includes sediment traps and grease traps):

Wastewater will be neutralized to a 6-7 pH then discharged into the sewer. The solution is continually cleaned with a Lakos centrifugal filter which removes 98% of particles that are 74 microns and larger.

C6. Describe any raw water treatment process utilized:

N/A

Image 5. Page 4 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION C (Continued)
PLANT OPERATIONAL CHARACTERISTICS

C7. Describe any water recycling processes utilized:

The washer receives any required daily make up water from the intermediate clean water rinse stage. The intermediate tank receives any daily make up water from the final clear water rinse tank.

C8. List the type and volume of liquid waste or sludges removed from the premises by means other than community sewers:

DESCRIPTION	VOLUME (Gallons/Month)	REMOVED BY (Name & Address)
Mill scale from HR steel continuously removed from washer with a cyclone extraction device	Approx. 100 pounds of solids per month.	Disposal at landfill.

C9. Is there a Spill Prevention Control and Countermeasure Plan in effect for this plant?

Yes _____ No __X__

If yes, describe briefly or attach a copy to questionnaire.

C10. Are there any Backflow Preventers in your system?

Yes __X__ No _____

C11. Have you checked your system regarding Cross Connection Prevention or Control at this plant?

Yes _____ No __X__

If yes, describe briefly or attach a copy to questionnaire.

Image 6. Page 5 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION D
WATER USE AND DISCHARGE INFORMATION

D1. List each raw water source (city, county, well, other), account number (if applicable), designated use (fire service, production, lawn sprinkler, etc.) and average monthly consumption (indicate units):

Source	Account Number	Use	Consumption
City of Rome	0005886	Production/ Sanitary	100,000 gallons

D2. Indicate water use categories, distribution of water used and the means of wastewater disposal (sanitary, storm sewer, waste hauler, other):

Water Used For	Water Supply Percentage of Total	Discharged To
Sanitary	95%	Sanitary Sewer
Process	5%	Sanitary Sewer
Boiler		
Cooler		
Other*		
In Product		

Measured _____ Estimated X

*Describe other water use(s): _____

D3. List plant outlets, size, and flow:

Reference No.	Sewer Size (Inches)	Description of Discharge Point	Flow (gpd)
1	4"	Main Office	1600
2	6"	Employee Lunchroom	1600

Image 7. Page 6 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION D (Continued)
WATER USE AND DISCHARGE INFORMATION

D4. Attach a drawing (to scale) of each building on the premises. Show locations of all water meters, storm drains, streams, sampling points, pretreatment facilities and each side sewer connected to the community sewer. Number each sewer as referenced in D3. A simple line drawing is sufficient.

D5. Is this plant subject to an existing Federal Pretreatment Standard? No

If so, what Pretreatment Standard is this plant subject to? _____

D6. Is the plant meeting pretreatment standards on a consistent basis? N/A

If not, list any schedule of additional pretreatment facility construction or operational changes required to achieve consistent compliance:

SECTION E
CONVENTIONAL POLLUTANT SURVEY

E1. Indicate the average and peak concentrations of the pollutants listed below. Most of the pollutants listed below are present in wastewater. If a particular pollutant (such as lint or dye) is not present in the wastewater check "Known Absent".

	Concentration Average	Concentration Peak	Known Absent
BOD_5 (mg/L)	141	141	
COD (mg/L)	671	671	
Nitrogen (mg/L)	44.0	44.0	
Phosphorous (mg/L)	38.6	38.6	
Suspended Solids (mg/L)	830	830	
Oil & Grease (mg/L)	43	43	
Lint or other filamentous material			X
Dyes			X
PH (S.U.)	9.0	9.0	
Temperature (°C)	23.9	23.9	

Image 8. Page 7 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION F
PRIORITY POLLUTANT SURVEY

F1. Below is a list of priority pollutants regulated by the State of Georgia. The City of Rome is required to monitor these pollutants at the POTW. Please indicate the concentration of each pollutant present in the industry's discharge. If the compound is not present in raw material, stored on site, transported or produced, whether as a product or by-product, check "Known Absent".

An actual analysis of the wastewater for Priority Pollutants at the detection limits listed may be attached in lieu of completing this section.

PRIORITY POLLUTANTS

	Chemical Constituents	Detection Limit	Concentration	Known Absent
1.	Methoxychlor	0.3 µg/L		X
2.	2,4-Dichlorophenoxyancetic acid (2,4-D)	5 µg/L		X
3.	2,4,5-Trichlorophenoxy propionic acid (TP Silvex)	10 µg/L		X
4.	Antimony	5 µg/L	109	
5.	Arsenic	5 µg/L	<30	
6.	Berylium	1 µg/L	<10	
7.	Cadmium	0.7 µg/L	14	
8.	Chromium (Total)	5 µg/L	222	
9.	Chromium (VI)	10 µg/L		X
10.	Copper	5 µg/L	1050	
11.	Lead	1 µg/L	38	
12.	Mercury	0.5 µg/L		X
13.	Nickel	5 µg/L	153	
14.	Selenium	5 µg/L	<40	
15.	Silver	5 µg/L		X
16.	Thallium	1 µg/L		X
17.	Zinc	10 µg/L	1280	
18.	Cyanide	25 µg/L		X
19.	Acrolein	50 µg/L		X
20.	Acrylonitrile	50 µg/L		X
21.	Benzene	2 µg/L		X
22.	Bromoform (Tribromomethane)	10 µg/L		X
23.	Carbon Tetrachloride	2 µg/L		X
24.	Chlorobenzene	10 µg/L		X
25.	Chlorodibromomethane	10 µg/L		X
26.	Chloroethane	5 µg/L		X
27.	2-Chloroethylvinyl Ether	10 µg/L		X
28.	Chloroform (Trichloromethane)	2 µg/L		X
29.	Dichlorobromomethane	10 µg/L		X
30.	1,1-Dichloroethane	2 µg/L		X
31.	1,2-Dichloroethane	2 µg/L		X
32.	1,1-Dichloroethylene	2 µg/L		X
33.	1,2-Dichloropropane	2 µg/L		X
34.	1,3-Dichloropropylene(Cis)	2 µg/L		X

Image 9. Page 8 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

PRIORITY POLLUTANTS (Continued)

	Chemical Constituents	Detection Limit	Concentration	Known Absent
35.	1,3-Dichloropropylene(Trans)	2 µg/L		X
36.	Ethylbenzene	2 µg/L		X
37.	Methyl Bromide (Bromomethane)	10 µg/L		X
38.	Methylene Chloride	10 µg/L		X
39.	Methyl Chloride (Chloromethane)	10 µg/L		X
40.	1,1,2,2-Tetrachloroethane	2 µg/L		X
41.	Tetrachloroethylene	2 µg/L		X
42.	Toluene	2 µg/L		X
43.	1,2-Trans-Dichloroethylene	2 µg/L		X
44.	1,1,1-Trichloroethane	2 µg/L		X
45.	1,1,2-Trichloroethane	2 µg/L		X
46.	Trichloroethylene	2 µg/L		X
47.	Vinyl Chloride	10 µg/L		X
48.	2-Chlorophenol	10 µg/L		X
49.	2,4-Dichlorophenol	10 µg/L		X
50.	2,4-Dimethylphenol	10 µg/L		X
51.	2-Methyl-4,6-Dinitrophenol (4,6-Dinitro-o-cresol)	50 µg/L		X
52.	2,4-Dinitrophenol	50 µg/L		X
53.	2-Nitrophenol	50 µg/L		X
54.	4-Nitrophenol	50 µg/L		X
55.	3-Methyl-4-Chlorophenol (Parachlorophenol)	10 µg/L		X
56.	Pentachlorophenol	20 µg/L		X
57.	Phenol	10 µg/L		X
58.	2,4,6-Trichlorophenol	10 µg/L		X
59.	Acenaphthene	10 µg/L		X
60.	Acenaphthylene	10 µg/L		X
61.	Anthracene	10 µg/L		X
62.	Benzidine	80 µg/L		X
63.	Benzo(a)Anthracene	10 µg/L		X
64.	Benzo(a)Pyrene	10 µg/L		X
65.	3,4-Benzofluoranthene	10 µg/L		X
66.	Benzo(ghi)Perylene	10 µg/L		X
67.	Benzo(k)Fluoranthene	10 µg/L		X
68.	Bis(2-Chloroethoxy)Methane	10 µg/L		X
69.	Bis(2-Chloroethyl)Ether	10 µg/L		X
70.	Bis(2-Chloroisopropyl)Ether	10 µg/L		X
71.	Bis(2-Ethylhexyl)Phthalate	10 µg/L		X
72.	4-Bromophenyl Phenyl Ether	10 µg/L		X
73.	Butylbenzyl Phthalate	10 µg/L		X
74.	2-Chloronaphthalene	10 µg/L		X
75.	4-Chlorophenyl Phenyl Ether	10 µg/L		X
76.	Chrysene	10 µg/L		X
77.	Dibenzo(a,h)Anthracene	10 µg/L		X
78.	1,2-Dichlorobenzene	10 µg/L		X
79.	1,3-Dichlorobenzene	10 µg/L		X

Image 10. Page 9 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

END OF REPORT

ENCLOSURE B

INFORMATION REQUEST PURSUANT TO SECTION 308 OF THE CLEAN WATER ACT

Instructions

1. Identify the person(s) responding to this Information Request.

2. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.

3. Precede each answer with the text and the number of the Question and its subpart to which the answer corresponds.

4. All documents submitted must contain a notation indicating the Question and subpart of the Question to which they are responsive.

5. In answering each Information Request Question and subpart thereto, identify all documents and persons consulted, examined or referred to in the preparation of each response, and provide true and accurate copies of all such documents.

6. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA as soon as possible.

7. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.

8. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.

9. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.

10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

11. The EPA requests that all documents provided in an electronic format be compatible with pdf.

12. The EPA requests that all spreadsheet information be in an electronic format and compatible with MS Excel.

13. If any Question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.

Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.

2. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.

3. The terms "And" and "Or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside it scope.

4. The term "Identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

5. The term "Identify" means, with respect to a document, to provide its customary business description; its date; its number, if any (invoice or purchase order number); the identity of the author, addressee and/or recipient; and substance of the subject matter.

6. The term "Identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.

7. The term "Facility" means Steel King Industries, Inc.'s facility located at 30 Industrial Boulevard in Rome, Floyd County, Georgia.

8. The term "You" and "Your" shall mean Steel King Industries, Inc., as named in attached letter.

9. The term "Permit" shall mean an industrial user permit issued to the Facility by the Control Authority.

10. "Control Authority" shall have the meaning set forth in 40 C.F.R. § 403.3(f).

Questions

1. If the Facility has applied for and/or received a Permit from the Control Authority (the City of Rome, Georgia) for process wastewater discharges, then provide a timeline of the wastewater permitting history for the Facility from 2008 to the present, including:

   a. the date(s) that Permit applications were either requested by the Control Authority or submitted by the Facility;

   b. the date(s) that draft or final Permit(s) were received by the Facility; and

   c. the date(s) that comments on such draft(s) were submitted to the Control Authority.

   If the Facility has never received a Permit for the discharge of process wastewaters to a publicly owned treatment works, then please explain this in the response.

2. Provide complete copies of all communication to or from the Control Authority (the City of Rome, Georgia) from 2009 to the present which concerns the Facility's process wastewater discharge(s). This information should be organized in chronological order with a table of contents. Communication that only regards water/sewer service billing or payment can be excluded.

3. Provide current schematics of the Facility property identifying the physical boundaries, the individual operational areas, and the process wastewater sources within each production area.

   Include a separate schematic identifying the pathway(s) of process wastewaters, the pathway(s) of non-process wastewaters, any in-line valves/storage/appurtenances, and any points of combining flows, beginning from the source(s) of the flow to the termination points at public sewers or other locations. Include a flow balance on this schematic identifying the current average daily flow rates of process wastewater and non-process wastewater during production. Identify the rate at each originating source, prior to each point of combining flows, and at each point of flow termination or storage. Identify the originating processes for the flows, the means of disposal at the termination points, the capacity and utilization of any storage, the flow rates in gallons per day, and whether each flow rate is measured or estimated.

4. Provide a timeline identifying the Facility's construction and narrative describing its production assets, their purpose and acquisition dates. Include the dates when the initial construction of the Facility began and when the initial discharge of process wastewater to the public sewer began. Finally, provide a timeline of when the Facility's metal treatment and powder coating processes were installed and placed into operation resulting in a discharge to the public sewer.

5. If the Facility was purchased in whole or part, then also provide the final contract date(s) for the purchase(s) of the assets. Provide the final purchase contract dates and detailed descriptions of any substantive modifications, additions, or replacements made to any production assets.

6. Provide a detailed discussion of the Facility's products and production processes, referencing the process source schematic provided for the production areas in item #3 above. Include the raw materials used, their preparation and their combination including, but not limited to:

a. Any physical/chemical preparation of the materials used, and if that is performed on-site;

b. The chemicals used in preparation of the materials, including a copy of any applicable Material Safety Data Sheets (MSDS).

c. Description of any physical preparation of the material, including but not limited, heating or cooling of wash waters; heating or cooling of any rinse waters; recycling of any rinse waters.

7. Provide all wastewater monitoring data collected by, or under contract to, the Facility since the discharge of process wastewater from the Facility to the public sewer began. The EPA prefers that such data be provided as a summary in an electronic spreadsheet format compatible with MS Excel. Present the data for laboratory-tested samples separately from data for flow, pH, temperature and other field- or continuously-monitored parameters. Include the following for each data point:

a. Parameter monitored;

b. Date monitored (month/day/year);

c. Analytical result;

d. Units;

e. Analytical method;

f. Sample type (grab, time-proportional composite, or flow-proportional composite)

g. Flow recorded at the time of monitoring;

h. Sampling location; and

i. Flow monitoring location.

Analytical methods need only be provided for laboratory analyses; for flow, pH, temperature and other field- or continuously-monitored parameters, identify the testing equipment used and their calibration frequencies. For flow monitoring data, only (a), (b), (c), (d), and (i) need to be provided. Location descriptions for (h) and (i) should be identifiable on the schematics provided in item #3 above.

8. Provide dated color photos of the Facility's typical production discharge to the sewer (if accessible), and of any wastewater treatment systems used prior to discharge. Identify the subject matter and location with each photo and reference the locations as they are identified on the schematics provided in item #3 above.

9. Provide a copy of any inspection reports, notices of violations, administrative orders, cease and desist orders, and any related correspondence from local, State or federal agencies related to the

process wastewater discharge from the Facility since the discharge of process wastewater from the Facility to the public sewer began.

10. Provide copies of all reporting sent in accordance with the regulations at 40 C.F.R. § 403.12 and/or under the Permit beginning at least 90 days before discharge to the public sewer until the date of this Information Request, including, but not limited to:

    a. Baseline report, as required by 40 C.F.R. § 403.12(b)

    b. Report on initial compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(d); and

    c. Periodic report(s) on continuing compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(e).

ENCLOSURE C

RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS

(40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that the EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, the EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, the EPA may make the information available to the public without any further notice to you.

40 C.F.R. § 2.203(b). **Method and time of asserting business confidentiality claim.** A business which is submitting information to the EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by the EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.

BLANK PAGE

#18

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

Laboratory Certifications

Code	Description	Number	Expires
LA	Louisiana	02069	08/30/2010
NC	North Carolina	381	12/31/2010
NELAC	NELAC (Non-Potable Water, Solids)	E87315	08/30/2010
SC	South Carolina	98011001	08/30/2010
TX	Texas	T104704397-08-TX	03/31/2011

Image 15. Page 15 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

Legend

Definition of Laboratory Terms

ND - None Detected at the Reporting Limit
TIC - Tentatively Identified Compound
CFU - Colony Forming Units
SOP - Method run per ASI Standard Operating Procedure
RL - Reporting Limit
DF - Dilution Factor
***** - Analyte not included in the NELAC list of certified analytes.

Sample Information

N-Nitrosodiphenylamine breaks down to diphenylamine in the GCMS, both analytes are reported as N-Nitrososdiphenylamine. ASI is not NELAC certified for diphenylamine.

Phthalic acid and phthalic anhydride are reported as dimethyl phthalate

Maleic acid and maleic anhydride are reported as dimethyl malate

1,2-Diphenylhydrazine breaks down to azobenzene in the GCMS; both analytes are reported as azobenzene

Definition of Qualifiers

QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to suspected matrix interference and/or non-homogeneous sample matrix.

Note: Unless otherwise noted, all results are reported on an as received basis.

Image 16. Page 16 of 18.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 17, 2010

CONVERSION TECHNOLOGY, INC.

LABORATORY ANALYSIS REQUEST FORM

SAMPLE ID	SAMPLING DATE AND TIME		GRAB	SAMPLE DESCRIPTION AND SAMPLE TYPE (i.e. SPIKE/MATER, WASTEWATER, GROUNDWATER, DRINKING WATER, SOIL, HAZARDOUS WASTE, SPECIFIC MEDIA, etc.)	# of Containers	Alkalinity	Bacteria	Cadmium	Chromium (total)	Copper	Lead	Mercury	Nickel	Selenium	Silver	TSS	Zinc
Stage 2	6/2/10 R.S.D.		✓	Wastewater	8	X	X	X	X	X	X	X	X	X	X	X	X

CHAIN OF CUSTODY

Relinquished by: Jeff Pool — Date/Time: 6/2/2010

Received by: Charles Hardy — Date/Time: 6/7/10 11:33

Method of Shipment: T-14 Fed Ex Ground Tracking

NOTES

Lab Remarks

Page 10 of 10

Image 17. Page 17 of 18. Note that a grab sample was collected, which is not compliant with categorical monitoring requirements in 40 C.F.R. 403.12(g) for sampling metals.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

LOG-IN CHECKLIST **Printed: 6/17/2010 3:53:51PM**

Attn: Mr. Jeff Pool

Client: Conversion Technology Inc.
Project: SK-WW
Date Received: 06/07/10 16:53

Work Order: ATT0219
Logged In By: Charles Hawks

OBSERVATIONS

#Samples: 1 **#Containers:** 8

Minimum Temp(C): 1.0 **Maximum Temp(C):** 1.0 **Custody Seal(s) Used:** Yes

CHECKLIST ITEMS

COC included with Samples	YES
Sample Container(s) Intact	YES
Chain of Custody Complete	YES
Sample Container(s) Match COC	YES
Custody seal Intact	YES
Temperature in Compliance	YES
Sufficient Sample Volume for Analysis	YES
Zero Headspace Maintained for VOA Analyses	YES
Samples labeled preserved (If Applicable)	YES
Samples received within Allowable Hold Times	YES
Samples Received on Ice	YES
Preservation Confirmed	YES

Comments:

Image 18. Page 18 of 18.

Attachment 2.B Wastewater Sludge Testing Results

Steel King Industries, Inc.

Conversion Technology Inc.
ENVIRONMENTAL CONSULTING ENGINEERS
2190 N. NORCROSS TUCKER ROAD, SUITE 202
NORCROSS, GEORGIA 30071
TEL: 770.263.6330 FAX: 770.263.8348
E-MAIL: CTI@CONVERSIONTECHNOLOGY.COM
WWW.CONVERSIONTECHNOLOGY.COM

June 30, 2010

KJH
3/02/10

Mr. John Cothran
Steel King Industries, Inc.
30 Floyd Industrial Blvd.
Rome, GA 30161

Dear Mr. Cothran.

Attached please find the results of the analytical testing of the solid sludge from the washing process collected on June 7, 2010. The sludge was analyzed under the Toxicity Characteristic Leaching Procedure (TCLP) for metals. All results are below the regulatory limits; therefore the sludge does not meet the definition of a hazardous waste as defined by 40 CFR Part 261, Subpart C. The waste is thus classified as a solid waste and the facility may continue to dispose of the sludge as such. Please keep a copy of this report and the laboratory analysis for your records.

If you have any questions or comments, please do not hesitate to call me at (770) 263-6330 ext. 116.

Sincerely,

Jeff Davis, PE
Sr. Environmental Engineer

Enclosure

Z:\SKISTS\SK_TST_LTR01.doc

Image 1. Cover page providing the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Laboratory Report

Prepared For:

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross, GA 30071

Attention: Mr. Jeff Pool

Report Number: ATF0218
June 14, 2010
Project: SK-TST
Project #:[none]

We appreciate the opportunity to provide the analytical support for your project. The analytical results in this report are based upon information supplied by you, the client, and are for your exclusive use. If you have any questions regarding this data package, please do not hesitate to call.

Approved:

Elizabeth Bryant
Project Manager

This report may not be reproduced, except in full, without written approval from Analytical Services, Inc.
Analytical Services, Inc. certifies that the following analytical results meet all requirements of the National Environmental Laboratory Accreditation Conference(NELAC).
All test results relate only to the samples analyzed.

Image 2. Page 1 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Sludge	ATF0218-01	Sludge	06/07/10 12:30	06/07/10 16:53

Page 2 of 9

Image 3. Page 2 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Project: SK-TST
Client ID: Sludge
Lab Number ID: ATF0218-01
Matrix: Sludge

Report No.: ATF0218
Date/Time Sampled: 6/7/2010 12:30:00PM
Date/Time Received: 6/7/2010 4:53:00PM

Analyte	Result	RL	TCLP Limit	Units	Method	Qual.	DF	Prep Date	Analysis Date	Batch	Init.
Metals, TCLP											
Mercury	ND	0.0050	0.2	mg/L	EPA 7470A		1	06/10/10 13:10	06/11/10 12:37	0060310	CSW
Arsenic	ND	2.50	5	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Barium	0.19	0.10	100	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Cadmium	ND	0.01	1	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Chromium	ND	0.01	5	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Lead	ND	0.10	5	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Selenium	ND	0.50	1	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS
Silver	ND	0.01	5	mg/L	EPA 6010C		1	06/10/10 13:10	06/11/10 10:58	0060309	FBS

Image 4. Page 3 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Report No.: ATF0218

Metals, TCLP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060309 - EPA 3010A										
Blank (0060309-BLK1)						Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	ND	2.50	mg/L							
Barium	ND	0.10	mg/L							
Cadmium	ND	0.01	mg/L							
Chromium	ND	0.01	mg/L							
Lead	ND	0.10	mg/L							
Selenium	ND	0.50	mg/L							
Silver	ND	0.01	mg/L							
Blank (0060309-BLK2)						Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	ND	2.50	mg/L							
Barium	ND	0.10	mg/L							
Cadmium	ND	0.01	mg/L							
Chromium	ND	0.01	mg/L							
Lead	ND	0.10	mg/L							
Selenium	ND	0.50	mg/L							
Silver	ND	0.01	mg/L							
LCS (0060309-BS1)						Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	1.07	2.50	mg/L	1.0000		107	80-120			
Barium	1.03	0.10	mg/L	1.0000		103	80-120			
Cadmium	1.02	0.01	mg/L	1.0000		102	80-120			
Chromium	1.03	0.01	mg/L	1.0000		103	80-120			
Lead	1.02	0.10	mg/L	1.0000		102	80-120			
Selenium	1.11	0.50	mg/L	1.0000		111	80-120			
Silver	1.08	0.01	mg/L	1.0000		108	80-120			
Matrix Spike (0060309-MS1)		Source: ATF0231-01				Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	1.06	2.50	mg/L	1.0000	ND	106	75-125			
Barium	1.11	0.10	mg/L	1.0000	ND	111	75-125			
Cadmium	1.01	0.01	mg/L	1.0000	ND	101	75-125			
Chromium	1.03	0.01	mg/L	1.0000	0.003	103	75-125			
Lead	1.01	0.10	mg/L	1.0000	ND	101	75-125			
Selenium	1.12	0.50	mg/L	1.0000	ND	112	75-125			
Silver	1.07	0.01	mg/L	1.0000	ND	107	75-125			

Image 5. Page 4 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Report No.: ATF0218

Metals, TCLP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060309 - EPA 3010A										
Matrix Spike Dup (0060309-MSD1)		Source: ATF0231-01				Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	1.09	2.50	mg/L	1.0000	ND	109	75-125	3	20	
Barium	1.14	0.10	mg/L	1.0000	ND	114	75-125	3	20	
Cadmium	1.04	0.01	mg/L	1.0000	ND	104	75-125	3	20	
Chromium	1.06	0.01	mg/L	1.0000	0.003	106	75-125	3	20	
Lead	1.04	0.10	mg/L	1.0000	ND	104	75-125	3	20	
Selenium	1.15	0.50	mg/L	1.0000	ND	115	75-125	3	20	
Silver	1.10	0.01	mg/L	1.0000	ND	110	75-125	3	20	
Post Spike (0060309-PS1)		Source: ATF0231-01				Prepared: 06/10/10 Analyzed: 06/11/10				
Arsenic	1.09		mg/L	1.0000	ND	109	80-120			
Barium	1.14		mg/L	1.0000	ND	114	80-120			
Cadmium	1.04		mg/L	1.0000	ND	104	80-120			
Chromium	1.06		mg/L	1.0000	0.003	106	80-120			
Lead	1.04		mg/L	1.0000	ND	104	80-120			
Selenium	1.15		mg/L	1.0000	ND	115	80-120			
Silver	1.09		mg/L	1.0000	ND	109	80-120			
Batch 0060310 - EPA 7470A										
Blank (0060310-BLK1)						Prepared: 06/10/10 Analyzed: 06/11/10				
Mercury	ND	0.0050	mg/L							
Blank (0060310-BLK2)						Prepared: 06/10/10 Analyzed: 06/11/10				
Mercury	ND	0.0050	mg/L							
LCS (0060310-BS1)						Prepared: 06/10/10 Analyzed: 06/11/10				
Mercury	0.0179	0.0050	mg/L	0.016667		108	80-120			

Page 5 of 9

Image 6. Page 5 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Report No.: ATF0218

Metals, TCLP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qual
Batch 0060310 - EPA 7470A										
Matrix Spike (0060310-MS1)		Source: ATF0218-01				Prepared: 06/10/10 Analyzed: 06/11/10				
Mercury	0.0173	0.0050	mg/L	0.016667	ND	104	75-125			
Matrix Spike Dup (0060310-MSD1)		Source: ATF0218-01				Prepared: 06/10/10 Analyzed: 06/11/10				
Mercury	0.0173	0.0050	mg/L	0.016667	ND	104	75-125	0.03	20	
Post Spike (0060310-PS1)		Source: ATF0218-01				Prepared: 06/10/10 Analyzed: 06/11/10				
Mercury	1.77		ug/L	1.6667	-0.0015	106	80-120			

Image 7. Page 6 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Laboratory Certifications

Code	Description	Number	Expires
LA	Louisiana	02069	06/30/2010
NELAC	NELAC (Non-Potable Water, Solids)	E87315	06/30/2010
SC	South Carolina	98011001	06/30/2010
TX	Texas	T104704397-08-TX	03/31/2011

Image 8. Page 7 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010

Legend

Definition of Laboratory Terms

ND - None Detected at the Reporting Limit
TIC - Tentatively Identified Compound
CFU - Colony Forming Units
SOP - Method run per ASI Standard Operating Procedure
RL - Reporting Limit
DF - Dilution Factor
***** - Analyte not included in the NELAC list of certified analytes.

Sample Information

N-Nitrosodiphenylamine breaks down to diphenylamine in the GCMS; both analytes are reported as N-Nitrososdiphenylamine. ASI is not NELAC certified for N-Nitrososdiphenylamine.

Phthalic acid and phthalic anhydride are reported as dimethyl phthalate

Maleic acid and maleic anhydride are reported as dimethyl malate

1,2-Diphenylhydrazine breaks down to azobenzene in the GCMS: both analytes are reported as azobenzene

Definition of Qualifiers

Note: Unless otherwise noted, all results are reported on an as received basis.

Image 9. Page 8 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

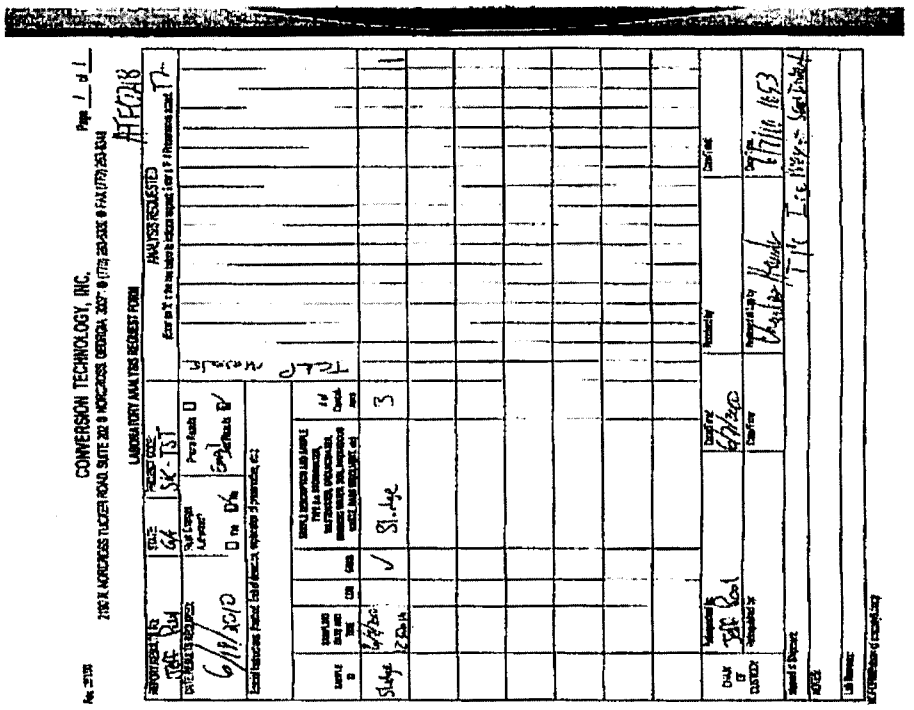
ASI

ANALYTICAL SERVICES, INC.

Environmental Monitoring & Laboratory Analysis
110 Technology Parkway, Norcross, GA 30092
(770) 734-4200 FAX (770) 734-4201

Conversion Technology Inc.
2190 Norcross Tucker Road
Norcross GA, 30071
Attention: Mr. Jeff Pool

June 14, 2010



Page 9 of 9

Image 10. Page 9 of 9 of the wastewater sludge sampling results, collected on June 7, 2010.

Attachment 2.C City of Rome Industrial Wastewater Questionnaire

Steel King Industries, Inc.

KJH 3/2/10

John Bennett, *City Manager*
DEPARTMENT OF PUBLIC SERVICES
W. Kirk Milam, P.E., *Manager*
Water and Sewer Division
Leigh Ross, *Director*
Mike Hackett, *Asst. Director*
Water Reclamation Facilities
Johnny C. Massingill, *Director*

October 11, 2010

Mike Adamczak
Steel King Industries, Inc.
30 Floyd Industrial Blvd.
Rome, Georgia 30161-9572

Re: Industrial Wastewater Questionnaire

Dear Mr. Adamczak:

Periodically, to update our records, The City of Rome sends out Industrial Wastewater Questionnaires. These questionnaires help determine which industries are Significant Industrial Users. Please complete this questionnaire and return to:

Anthony L. Abercrombie, Laboratory Supervisor
City of Rome Water Reclamation Facilities
212 Blacks Bluff Road
Rome, Georgia 30161-4610

If you have any questions, please call me at 706-236-4592.

Sincerely,

Anthony L. Abercrombie

Anthony L. Abercrombie
WRF Laboratory Supervisor
City of Rome, Georgia

cc: Leigh Ross, Director, Water and Sewer Division
Johnny Massingill, WRF Director

212 Blacks Bluff Road • Rome, Georgia 30161-4610
phone: 706/236-4591 • *fax:* 706/236-4594

Image 1. Cover page for the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

ROME
G·E·O·R·G·I·A

INDUSTRIAL WASTEWATER QUESTIONNAIRE
WATER & SEWER DIVISION

SECTION A
GENERAL INFORMATION

A1. Applicant Business Name Steel King Industries, Inc.

A2. Address of Premise Discharging Wastewater:

Street 30 Industrial Boulevard, Southeast

City Rome State GA Zip 30161

A3. Business Address:

Street or P.O. Box 2700 Chamber Street

City Stevens Point State WI Zip 54481

A4. Name and Title of Signing Official:

Name John Cothran Title Plant Manager

A5. Person to be contacted about this application:

Name John Cothran Title Plant Manager Phone 706-291-2222

A6. Person to be contacted in case of emergency:

Name John Cothran Day Phone 706-291-2222 Night Phone 706-853-9169

The information contained in this application is familiar to me and to the best of my knowledge and belief, such information is true, accurate, and complete.

Date 01/25/2011 Signature

Note to Signing Official: In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.13, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of information shall be governed by procedures specified in 40 CFR Part 2.

Image 2. Page 1 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION B
PRODUCT OR SERVICE INFORMATION

B1. Provide a brief narrative of manufacturing or service activity at premise address (include principal raw materials, catalysts, intermediates, products):

Steel King Industries, Inc. purchases HR structural steel in various shapes to be used in the fabrication of industrial warehouse rack systems. The fabricated rack components are cleaned in a three stage washer and then powder coated. The cleaner is manufactured by KCI Chemicals. The mild phosphoric acid is used in a 1.5% solution and will be neutralized to a 6-7 pH prior to discharge.

B2. List the Standard Industrial Classification (SIC) Codes for principle product or services:

PRODUCTS OR SERVICES	SIC CODE (4 DIGIT)	PERCENTAGE OF PRODUCTION
Fabricated Metal Products	2542	100%

B3. Substances Discharged – Give common and technical names of each raw material and product that may be discharged to the sewer. Briefly describe the physical and chemical properties of each substance and product:

COMMON / TECHNICAL	PHYSICAL AND CHEMICAL PROPERTIES
KCI Liqua Phos 6929	Liquid, 5% Nitric Acid and 20% Phosphoric Acid
Hooke Kleen P	Liquid, 40% Phosphoric Acid

B4. What potentially hazardous, corrosive, flammable, explosive, or toxic substances are handled at your plant? Identify those that could possibly be discharged to a sewer.

Heath Hazards - pH UP, pH Down, Liqua Phos, Hook Klene P
Flammable - Mighty Lube Type ML lubricants, Powder Coat Paints

pH UP, pH Down, Liqua Phos, Hook Klene P, and lubricants have the possibility of being discharged.

Image 3. Page 2 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome. Note that the both solutions contain phosphoric acid.

SECTION B (Continued)
PRODUCT OR SERVICE INFORMATION

B5. Describe all wastewater generating operations (including processes and clean-ups):

During normal operations, 3-5 gpm of freshwater rinse will be continually discharged. Every 6-8 months the washer will be drained and cleaned. The contents of the washer (4,000 gallons of 1.5% phosphoric acid solution) and two rinse tanks (2,400 gallons total) will be drained into a closure. This diluted solution will be neutralized and released to the sewer.

B6. Identify information entitled to protection as a trade secret:

Section	Reason
N/A	N/A

SECTION C
PLANT OPERATIONAL CHARACTERISTICS

C1. Are major processes batch or continuous? Continuous

If batch, average number of batches per 24 hour day: N/A

C2. Variation of Operation

Indicate whether the business activity is:

a. X Continuous through the year, or
___ Seasonal – Circle the months of the year during which operations occur:

JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC

Peak month(s) of operation is (are): N/A

b. ___ Continuous throughout the week, or
X Circle the days of the week during which operations occur:

SUN MON TUE WED THU FRI SAT

Peak day(s) of operation is (are): N/A

c. X Are there any scheduled shutdowns? Yes X No ___

When and Why? Christmas/New Year's Break

Image 4. Page 3 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION C (Continued)
PLANT OPERATIONAL CHARACTERISTICS

C3. Wastewater Discharge Periods

a. Discharge occurs daily: From 6 A.M. to 11 P.M.
Circle the days of the week that discharge occurs:

SUN MON TUE WED THU FRI SAT

Peak day(s) of discharge is (are): N/A

b. Clean-up discharge daily: From 6 A.M. to 2:30 P.M.
Circle the days of the week that discharge occurs due to clean-up:

SUN MON TUE WED THU FRI SAT

C4. Shift Information:
Total Number of Employees: 115

Number of Employees per shift (Office / Production):

	DAY	EVENING	NIGHT
WEEKDAY	9 / 65	1 / 50	/
SATURDAY	9 / 65	1 / 50	/
SUNDAY	9 / 65	1 / 50	/
SEASONAL	/	/	/

Shift Hours:

	DAY	EVENING	NIGHT
WEEKDAY	6 A.M. to 2:30 P.M.	2:30 to 11 P.M.	to
SATURDAY	6 A.M. to 2:30 P.M.	2:30 to 11 P.M.	to
SUNDAY	6 A.M. to 2:30 P.M.	2:30 to 11 P.M.	to
SEASONAL	to	to	to

C5. Describe any wastewater treatment equipment or processes in use (includes sediment traps and grease traps):

Wastewater will be neutralized to a 6-7 pH then discharged into the sewer. The solution is continually cleaned with a Lakos centrifugal filter which removes 98% of particles that are 74 microns and larger.

C6. Describe any raw water treatment process utilized:

N/A

Image 5. Page 4 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION C (Continued)
PLANT OPERATIONAL CHARACTERISTICS

C7. Describe any water recycling processes utilized:

The washer receives any required daily make up water from the intermediate clean water rinse stage. The intermediate tank receives any daily make up water from the final clear water rinse tank.

C8. List the type and volume of liquid waste or sludges removed from the premises by means other than community sewers:

DESCRIPTION	VOLUME (Gallons/Month)	REMOVED BY (Name & Address)
Mill scale from HR steel continuously removed from washer with a cyclone extraction device	Approx. 100 pounds of solids per month.	Disposal at landfill.

C9. Is there a Spill Prevention Control and Countermeasure Plan in effect for this plant?

Yes _____ No __X__

If yes, describe briefly or attach a copy to questionnaire.

C10. Are there any Backflow Preventers in your system?

Yes __X__ No _____

C11. Have you checked your system regarding Cross Connection Prevention or Control at this plant?

Yes _____ No __X__

If yes, describe briefly or attach a copy to questionnaire.

Image 6. Page 5 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION D
WATER USE AND DISCHARGE INFORMATION

D1. List each raw water source (city, county, well, other), account number (if applicable), designated use (fire service, production, lawn sprinkler, etc.) and average monthly consumption (indicate units):

Source	Account Number	Use	Consumption
City of Rome	0005886	Production/ Sanitary	100,000 gallons

D2. Indicate water use categories, distribution of water used and the means of wastewater disposal (sanitary, storm sewer, waste hauler, other):

Water Used For	Water Supply Percentage of Total	Discharged To
Sanitary	95%	Sanitary Sewer
Process	5%	Sanitary Sewer
Boiler		
Cooler		
Other*		
In Product		

Measured _____ Estimated X

*Describe other water use(s): _____

D3. List plant outlets, size, and flow:

Reference No.	Sewer Size (Inches)	Description of Discharge Point	Flow (gpd)
1	4"	Main Office	1600
2	6"	Employee Lunchroom	1600

Image 7. Page 6 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION D (Continued)
WATER USE AND DISCHARGE INFORMATION

D4. Attach a drawing (to scale) of each building on the premises. Show locations of all water meters, storm drains, streams, sampling points, pretreatment facilities and each side sewer connected to the community sewer. Number each sewer as referenced in D3. A simple line drawing is sufficient.

D5. Is this plant subject to an existing Federal Pretreatment Standard? No

If so, what Pretreatment Standard is this plant subject to? _____

D6. Is the plant meeting pretreatment standards on a consistent basis? N/A

If not, list any schedule of additional pretreatment facility construction or operational changes required to achieve consistent compliance:

SECTION E
CONVENTIONAL POLLUTANT SURVEY

E1. Indicate the average and peak concentrations of the pollutants listed below. Most of the pollutants listed below are present in wastewater. If a particular pollutant (such as lint or dye) is not present in the wastewater check "Known Absent".

	Concentration Average	Concentration Peak	Known Absent
BOD_5 (mg/L)	141	141	
COD (mg/L)	671	671	
Nitrogen (mg/L)	44.0	44.0	
Phosphorous (mg/L)	38.6	38.6	
Suspended Solids (mg/L)	830	830	
Oil & Grease (mg/L)	43	43	
Lint or other filamentous material			X
Dyes			X
PH (S.U.)	9.0	9.0	
Temperature (°C)	23.9	23.9	

Image 8. Page 7 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

SECTION F
PRIORITY POLLUTANT SURVEY

F1. Below is a list of priority pollutants regulated by the State of Georgia. The City of Rome is required to monitor these pollutants at the POTW. Please indicate the concentration of each pollutant present in the industry's discharge. If the compound is not present in raw material, stored on site, transported or produced, whether as a product or by-product, check "Known Absent".

An actual analysis of the wastewater for Priority Pollutants at the detection limits listed may be attached in lieu of completing this section.

PRIORITY POLLUTANTS

	Chemical Constituents	Detection Limit	Concentration	Known Absent
1.	Methoxychlor	0.3 µg/L		X
2.	2,4-Dichlorophenoxyacetic acid (2,4-D)	5 µg/L		X
3.	2,4,5-Trichlorophenoxy propionic acid (TP Silvex)	10 µg/L		X
4.	Antimony	5 µg/L	109	
5.	Arsenic	5 µg/L	<30	
6.	Berylium	1 µg/L	<10	
7.	Cadmium	0.7 µg/L	14	
8.	Chromium (Total)	5 µg/L	222	
9.	Chromium (VI)	10 µg/L		X
10.	Copper	5 µg/L	1050	
11.	Lead	1 µg/L	38	
12.	Mercury	0.5 µg/L		X
13.	Nickel	5 µg/L	153	
14.	Selenium	5 µg/L	<40	
15.	Silver	5 µg/L		X
16.	Thallium	1 µg/L		X
17.	Zinc	10 µg/L	1280	
18.	Cyanide	25 µg/L		X
19.	Acrolein	50 µg/L		X
20.	Acrylonitrile	50 µg/L		X
21.	Benzene	2 µg/L		X
22.	Bromoform (Tribromomethane)	10 µg/L		X
23.	Carbon Tetrachloride	2 µg/L		X
24.	Chlorobenzene	10 µg/L		X
25.	Chlorodibromomethane	10 µg/L		X
26.	Chloroethane	5 µg/L		X
27.	2-Chloroethylvinyl Ether	10 µg/L		X
28.	Chloroform (Trichloromethane)	2 µg/L		X
29.	Dichlorobromomethane	10 µg/L		X
30.	1,1-Dichloroethane	2 µg/L		X
31.	1,2-Dichloroethane	2 µg/L		X
32.	1,1-Dichloroethylene	2 µg/L		X
33.	1,2-Dichloropropane	2 µg/L		X
34.	1,3-Dichloropropylene(Cis)	2 µg/L		X

Image 9. Page 8 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

PRIORITY POLLUTANTS (Continued)

	Chemical Constituents	Detection Limit	Concentration	Known Absent
35.	1,3-Dichloropropylene(Trans)	2 µg/L		X
36.	Ethylbenzene	2 µg/L		X
37.	Methyl Bromide (Bromomethane)	10 µg/L		X
38.	Methylene Chloride	10 µg/L		X
39.	Methyl Chloride (Chloromethane)	10 µg/L		X
40.	1,1,2,2-Tetrachloroethane	2 µg/L		X
41.	Tetrachloroethylene	2 µg/L		X
42.	Toluene	2 µg/L		X
43.	1,2-Trans-Dichloroethylene	2 µg/L		X
44.	1,1,1-Trichloroethane	2 µg/L		X
45.	1,1,2-Trichloroethane	2 µg/L		X
46.	Trichloroethylene	2 µg/L		X
47.	Vinyl Chloride	10 µg/L		X
48.	2-Chlorophenol	10 µg/L		X
49.	2,4-Dichlorophenol	10 µg/L		X
50.	2,4-Dimethylphenol	10 µg/L		X
51.	2-Methyl-4,6-Dinitrophenol (4,6-Dinitro-o-cresol)	50 µg/L		X
52.	2,4-Dinitrophenol	50 µg/L		X
53.	2-Nitrophenol	50 µg/L		X
54.	4-Nitrophenol	50 µg/L		X
55.	3-Methyl-4-Chlorophenol (Parachlorophenol)	10 µg/L		X
56.	Pentachlorophenol	20 µg/L		X
57.	Phenol	10 µg/L		X
58.	2,4,6-Trichlorophenol	10 µg/L		X
59.	Acenaphthene	10 µg/L		X
60.	Acenaphthylene	10 µg/L		X
61.	Anthracene	10 µg/L		X
62.	Benzidine	80 µg/L		X
63.	Benzo(a)Anthracene	10 µg/L		X
64.	Benzo(a)Pyrene	10 µg/L		X
65.	3,4-Benzofluoranthene	10 µg/L		X
66.	Benzo(ghi)Perylene	10 µg/L		X
67.	Benzo(k)Fluoranthene	10 µg/L		X
68.	Bis(2-Chloroethoxy)Methane	10 µg/L		X
69.	Bis(2-Chloroethyl)Ether	10 µg/L		X
70.	Bis(2-Chloroisopropyl)Ether	10 µg/L		X
71.	Bis(2-Ethylhexyl)Phthalate	10 µg/L		X
72.	4-Bromophenyl Phenyl Ether	10 µg/L		X
73.	Butylbenzyl Phthalate	10 µg/L		X
74.	2-Chloronaphthalene	10 µg/L		X
75.	4-Chlorophenyl Phenyl Ether	10 µg/L		X
76.	Chrysene	10 µg/L		X
77.	Dibenzo(a,h)Anthracene	10 µg/L		X
78.	1,2-Dichlorobenzene	10 µg/L		X
79.	1,3-Dichlorobenzene	10 µg/L		X

Image 10. Page 9 of 9 the Industrial Wastewater Questionnaire completed by the facility for the City of Rome.

END OF REPORT

ENCLOSURE B

INFORMATION REQUEST PURSUANT TO SECTION 308 OF THE CLEAN WATER ACT

Instructions

1. Identify the person(s) responding to this Information Request.

2. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.

3. Precede each answer with the text and the number of the Question and its subpart to which the answer corresponds.

4. All documents submitted must contain a notation indicating the Question and subpart of the Question to which they are responsive.

5. In answering each Information Request Question and subpart thereto, identify all documents and persons consulted, examined or referred to in the preparation of each response, and provide true and accurate copies of all such documents.

6. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA as soon as possible.

7. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.

8. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.

9. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.

10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

11. The EPA requests that all documents provided in an electronic format be compatible with pdf.

12. The EPA requests that all spreadsheet information be in an electronic format and compatible with MS Excel.

13. If any Question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.

Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.

2. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.

3. The terms "And" and "Or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside it scope.

4. The term "Identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

5. The term "Identify" means, with respect to a document, to provide its customary business description; its date; its number, if any (invoice or purchase order number); the identity of the author, addressee and/or recipient; and substance of the subject matter.

6. The term "Identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.

7. The term "Facility" means Steel King Industries, Inc.'s facility located at 30 Industrial Boulevard in Rome, Floyd County, Georgia.

8. The term "You" and "Your" shall mean Steel King Industries, Inc., as named in attached letter.

9. The term "Permit" shall mean an industrial user permit issued to the Facility by the Control Authority.

10. "Control Authority" shall have the meaning set forth in 40 C.F.R. § 403.3(f).

Questions

1. If the Facility has applied for and/or received a Permit from the Control Authority (the City of Rome, Georgia) for process wastewater discharges, then provide a timeline of the wastewater permitting history for the Facility from 2008 to the present, including:

   a. the date(s) that Permit applications were either requested by the Control Authority or submitted by the Facility;

   b. the date(s) that draft or final Permit(s) were received by the Facility; and

   c. the date(s) that comments on such draft(s) were submitted to the Control Authority.

   If the Facility has never received a Permit for the discharge of process wastewaters to a publicly owned treatment works, then please explain this in the response.

2. Provide complete copies of all communication to or from the Control Authority (the City of Rome, Georgia) from 2009 to the present which concerns the Facility's process wastewater discharge(s). This information should be organized in chronological order with a table of contents. Communication that only regards water/sewer service billing or payment can be excluded.

3. Provide current schematics of the Facility property identifying the physical boundaries, the individual operational areas, and the process wastewater sources within each production area.

   Include a separate schematic identifying the pathway(s) of process wastewaters, the pathway(s) of non-process wastewaters, any in-line valves/storage/appurtenances, and any points of combining flows, beginning from the source(s) of the flow to the termination points at public sewers or other locations. Include a flow balance on this schematic identifying the current average daily flow rates of process wastewater and non-process wastewater during production. Identify the rate at each originating source, prior to each point of combining flows, and at each point of flow termination or storage. Identify the originating processes for the flows, the means of disposal at the termination points, the capacity and utilization of any storage, the flow rates in gallons per day, and whether each flow rate is measured or estimated.

4. Provide a timeline identifying the Facility's construction and narrative describing its production assets, their purpose and acquisition dates. Include the dates when the initial construction of the Facility began and when the initial discharge of process wastewater to the public sewer began. Finally, provide a timeline of when the Facility's metal treatment and powder coating processes were installed and placed into operation resulting in a discharge to the public sewer.

5. If the Facility was purchased in whole or part, then also provide the final contract date(s) for the purchase(s) of the assets. Provide the final purchase contract dates and detailed descriptions of any substantive modifications, additions, or replacements made to any production assets.

6. Provide a detailed discussion of the Facility's products and production processes, referencing the process source schematic provided for the production areas in item #3 above. Include the raw materials used, their preparation and their combination including, but not limited to:

a. Any physical/chemical preparation of the materials used, and if that is performed on-site;

b. The chemicals used in preparation of the materials, including a copy of any applicable Material Safety Data Sheets (MSDS).

c. Description of any physical preparation of the material, including but not limited, heating or cooling of wash waters; heating or cooling of any rinse waters; recycling of any rinse waters.

7. Provide all wastewater monitoring data collected by, or under contract to, the Facility since the discharge of process wastewater from the Facility to the public sewer began. The EPA prefers that such data be provided as a summary in an electronic spreadsheet format compatible with MS Excel. Present the data for laboratory-tested samples separately from data for flow, pH, temperature and other field- or continuously-monitored parameters. Include the following for each data point:

a. Parameter monitored;

b. Date monitored (month/day/year);

c. Analytical result;

d. Units;

e. Analytical method;

f. Sample type (grab, time-proportional composite, or flow-proportional composite)

g. Flow recorded at the time of monitoring;

h. Sampling location; and

i. Flow monitoring location.

Analytical methods need only be provided for laboratory analyses; for flow, pH, temperature and other field- or continuously-monitored parameters, identify the testing equipment used and their calibration frequencies. For flow monitoring data, only (a), (b), (c), (d), and (i) need to be provided. Location descriptions for (h) and (i) should be identifiable on the schematics provided in item #3 above.

8. Provide dated color photos of the Facility's typical production discharge to the sewer (if accessible), and of any wastewater treatment systems used prior to discharge. Identify the subject matter and location with each photo and reference the locations as they are identified on the schematics provided in item #3 above.

9. Provide a copy of any inspection reports, notices of violations, administrative orders, cease and desist orders, and any related correspondence from local, State or federal agencies related to the

process wastewater discharge from the Facility since the discharge of process wastewater from the Facility to the public sewer began.

10. Provide copies of all reporting sent in accordance with the regulations at 40 C.F.R. § 403.12 and/or under the Permit beginning at least 90 days before discharge to the public sewer until the date of this Information Request, including, but not limited to:

    a. Baseline report, as required by 40 C.F.R. § 403.12(b)

    b. Report on initial compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(d); and

    c. Periodic report(s) on continuing compliance with categorical pretreatment standards, as required by 40 C.F.R. § 403.12(e).

ENCLOSURE C

RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS

(40 C.F.R. Part 2)

Except for effluent data, you may, if you desire, assert a business confidentiality claim as to any or all of the information that the EPA is requesting from you. The EPA regulation relating to business confidentiality claims is found at 40 C.F.R. Part 2.

If you assert such a claim for the requested information, the EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, the EPA may make the information available to the public without any further notice to you.

40 C.F.R. § 2.203(b). **Method and time of asserting business confidentiality claim.** A business which is submitting information to the EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified by the business, and may be submitted separately to facilitate identification and handling by the EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.