



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R 0 0 3 3 7 2 3 11 12 0 7 1 2 1 1 17 18 P 19 S 20 1					
Remarks					
7 0 - 0 0 3 4 1					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 4	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of El Dorado El Dorado Pretreatment Program	Entry Time/Date 10:08/12-11-07	Permit Effective Date 01 March 2003
	Exit Time/Date 11:55/12/12/07	Permit Expiration Date 29 February 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Harold Baker/Treatment Superintendent/870-862-6951 John Peppers/Pretreatment Coordinator	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Larry Waldrop/General Manager/870-862-6951 El Dorado Water Utilities P.O. Box 1587 El Dorado, AR 71731	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	S	Sampling
S	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	S	Laboratory	N	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

The program is still operating very smoothly. The staff seems very knowledgeable of the pretreatment program. The City continues to do the sampling for the industries, (expect pH for Miller Transport). The items noted during the last PCI have been corrected.

Name(s) and Signature(s) of Inspector(s) John W. Lamb	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality/ El Dorado 870-862-0680, Fax 870-862-3509	Date 09 January 2008
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

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Name of Municipality: City of El Dorado

AFIN Number: 70-00341

NPDES Permit Numbers: AR0033723, AR0033936, AR0049443

Program Tracked under NPDES Permit Number: AR0033723

Fact Sheet Preparation Date: Unknown

Date of Last PCI/Audit: 13 December 2006 PCI

Date of Last Annual Report: March 2007 for Jan-Dec 2006

Name of Inspector: John W. Lamb

Date PCI Performed: 11 & 12 December 2007

Name, Title, and Telephone Number of Facility Representative:
Harold Baker, Treatment Superintendent, 870-862-6451
John Pepper, Pretreatment Coordinator,

Name and Title of Other Participants: N/A

Number of IUs Visited: 5

Name(s) of IUs Visited: Milbank, Pilgrims Pride Processing Plant,
Pilgrim's Pride Hatchery, El Dorado Paper Bag, Prescolite
Reflector

Note: AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

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NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. Cooper Standard

2. Has ADPC&E or EPA been notified of these changes? yes
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** yes
4. What procedures are being used to update the IU Survey?
A review of Water accounts is done every two years
IU survey is sent to all industries.

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 07

6. Number of Categorical Industrial Users: 3
7. How does the POTW determine the appropriate categorical standards to apply to an IU? _____
Code of Federal Registry as per ADEQ

8. List all categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (such as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:

Category:

Regulated Process:

Prescolite ReflectorMetal FinishingAnodizingMilbankMetal FinishingPhosphatizingMiller TransportTrans equip cleaningEquip. cleaning

B. LOCAL LIMITS

1. **IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADPC&E OR EPA?** YES

2. Describe any apparent problems with the local limits.
None noted

2. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
influent	<u>4/year</u>	<u>4/year</u>	<u>yearly</u>	
effluent	<u>4/year</u>	<u>4/year</u>	<u>yearly</u>	
sludge	<u>yearly</u>	<u>yearly</u>	<u>Yearly</u>	
Organics:				
influent	<u>yearly</u>	<u>yearly</u>	<u>yearly</u>	
effluent	<u>yearly</u>	<u>yearly</u>	<u>Yearly</u>	
sludge	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective? _____

None noted according to Mr. Baker.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? permit
2. How many IU permits (or other control documents) have been issued? 18
3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**
yes
4. Does the control document contain the following items?
An expiration date yes
Discharge limitations yes

If the program requires self-monitoring by the IUs, do the permits contain

IU self-monitoring requirements yes (Miller Transport only)

IU reporting requirements yes (Miller Transport only)

5. Indicate which of the following recommended standard conditions are contained in the control documents:

sample location yes
 type of sample yes
 monitoring frequency yes
 bypass prohibition yes
 right of entry yes
 nontransferability yes
 revocation clause yes
 penalty provisions yes
 slug load notification yes
 notification of process change yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>batch-twice/year</u>	<u>twice per year</u>
other SIUs	<u>once/week-twice/year</u>	<u>yearly</u>
Inspection:		
categorical IUs	<u>yearly</u>	<u>yearly</u>
other SIUs	<u>yearly</u>	<u>yearly</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** yes

3. Are inspections announced or unannounced? both

4. Are records kept of each inspection? yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection yes

Officials present yes

Inspection of chemical storage areas yes

Description of regulated processes, categorical wastestreams, and discharge location of these wastestreams yes

Inspection of the pretreatment facilities yes

Review of self-monitoring records yes, Miller Transport

Observation of IU self-monitoring procedures yes, Miller

Verification that approved analytical techniques are used yes

Verification of IU flow measurement (where required) yes

6. Overall adequacy of inspection documentation: adequate

7. **DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).**
yes
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? yes
9. Are sampling and flow monitoring equipment properly maintained? yes
10. Is the POTW keeping proper field notes and chain of custody forms? yes
11. Is the sampling location representative of the discharge to the collection system? yes
12. Are sampling locations identified in POTW records? yes
13. Are sampling services available in an emergency? yes
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Mr. Peppers reviews all reports when they are received, then again when the lab bills are attached.
15. **ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?** Yes, the City does all the sampling and contracts all analysis with an outside lab, expect for pH at Miller, so the facility actually sees the lab data before the permittees.
16. **IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?**
yes

17. What are the POTW's procedures for following up violations? Since the City does all the sampling and analysis, (except Miller Transport, pH) Mr. Peppers knows of all the violations before the industries. Emails, letters, CAO's and revocation of permit are the enforcement actions which are used. The City also sends surcharges for BOD excursions with the water bills.

18. **HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?** yes

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address yes

Other environmental permits held yes

Description of operations yes

Process flow diagrams yes

Flow measurements yes

Measurements of regulated pollutants yes

Certification of compliance by the IU yes

Compliance schedule (if needed) yes

19. Additional comments on the POTW's inspection and sampling procedures: Since the POTW does almost all the sampling and contracts the lab work, the facility has very good sampling data for all facilities. The industries also seem to like this arrangement because it is less paperwork for them to keep; to ensure compliance.

E. ENFORCEMENT

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS?

yes

2. How does the POTW respond to the following violations?

Effluent limitations _____emails, letter, surcharges_____

Late reports _emails and letter_____

Unpermitted discharges _suspend water and sewer usage

Slug loads or spills _spills are contained at manholes and then the clean up contracted and billed back to the spiller.

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)?

yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
<u>None this</u>	<u>_year_____</u>	<u>_____</u>	<u>_____</u>
<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

5. Comments on the POTW's enforcement procedures:

The POTW has a very good handle on enforcement. Very little enforcement is needed due to the limited number Industrial Users. Since the last inspection the city has gone to using emails instead of phone calls. The city then prints the emails and keeps them in a log.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program?

yes

2. Are staffing levels adequate? yes

3. Are the responsible officials familiar with the approved program?

yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:

n/a

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area?

n/a

3. Does the POTW have copies of permits for IUs in user cities?

n/a

4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? n/a

5. Comments on multijurisdictional issues:

n/a

H. EVALUATION AND COMMENTS

The overall pretreatment program is running very smoothly. The facility has corrected the problems noted in the previous inspection by verifying the self monitoring at Miller Transport, the only industry that does any self monitoring (pH only). The facility had also instituted a phone log, but then went to using an email log in responding to enforcement issues. This seems to work better, because the facility can just print out any correspondence with the industries and place it in a file. The facility also started looking at flow measuring equipment in the industries, and has discovered that the flow meter at Pilgrims Pride Processing plant had not been calibrated in over a year.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Pilgrim's Pride Hatchery

POTW Name: City of El Dorado

Industry Contacts: Waylon Bovee

Date and Time of Visit: 12 December 2007/09:40

Description of Manufacturing Process: hatch chickens from eggs

Sources of Process Wastewater:
 wash down of racks and egg trays

Categorical Industry? no

Basis for Limits: n/a

Point of Application: n/a

Description of Pretreatment Equipment and Procedures: egg shell and grease trap

Spill Prevention and Solvent Management Procedures:
 n/a

Sampling Location and Equipment: manhole on north side of parking lot directly down stream from grease trap

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Milbank IndustriesPOTW Name: City of El DoradoIndustry Contacts: Tom GalbraithDate and Time of Visit: 12 December 2007 09:55Description of Manufacturing Process: Manufacturing of electrical boxes from stamping and forming.Sources of Process Wastewater: 5 Stage rinse waterCategorical Industry? YESBasis for Limits: Metal FinishingPoint of Application: PhosphatizingDescription of Pretreatment Equipment and Procedures: pH adjustmentSpill Prevention and Solvent Management Procedures:
n/aSampling Location and Equipment: Manhole east side of plant, 5 feet from building, end of process at this location.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Prescolite ReflectorPOTW Name: City of El DoradoIndustry Contacts: Mike PhillipsDate and Time of Visit: 12 December 2007 10:25Description of Manufacturing Process: Manufacture of recessed light fixtures

Sources of Process Wastewater:

5 stage dipCategorical Industry? yesBasis for Limits: Metal FinishingPoint of Application: AnodizingDescription of Pretreatment Equipment and Procedures: metals precipitation, belt press and pH adjustment

Spill Prevention and Solvent Management Procedures:

n/aSampling Location and Equipment: End of rinse, inside after last stage, total plant flow, manhole outside facility's gate

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: El Dorado Paper BagPOTW Name: City of El DoradoIndustry Contacts: Gary TaylorDate and Time of Visit: 12 December 2007 11:42Description of Manufacturing Process: manufacture food grade paper products from rolled paper

Sources of Process Wastewater:

wash down of inks used in manufacture of productsCategorical Industry? noBasis for Limits: n/aPoint of Application: n/aDescription of Pretreatment Equipment and Procedures: Clarifier followed by belt press for solids. Facility plans on adding a larger clarifier in 2008.

Spill Prevention and Solvent Management Procedures:

inks are stored in an area without floor drains.Sampling Location and Equipment: Manhole west of facility below parking lot

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Pilgrims Pride Processing Plant

POTW Name: City of El Dorado

Industry Contacts: James Daniels

Date and Time of Visit: 12 December 2007, 11:07

Description of Manufacturing Process: Chicken processing plant. Live birds are brought in and processed for food.

Sources of Process Wastewater: blood and wash water

Categorical Industry? no

Basis for Limits: n/a

Point of Application: n/a

Description of Pretreatment Equipment and Procedures: DAF Units, clarifiers.

Spill Prevention and Solvent Management Procedures:
 n/a

Sampling Location and Equipment: process plant flow, Parshall flume at pretreatment processing plant.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

CODE

INSPECTOR'S NAME John W. Lamb

NAME OF FACILITY City of El Dorado

PERMIT NUMBER USED TO
TRACK PROGRAM AR0033723 NPID

DATE OF PCI 11 & 12 December 2007 DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS) 07 SIUS

NUMBER OF CATEGORICAL IUS 3 CIUS

SIUS NOT SAMPLED OR INSPECTED BY POTW 0 NOIN

SIUS WITHOUT CONTROL MECHANISM 0 NOCM

SIUS IN SIGNIFICANT NONCOMPLIANCE
WITH STANDARDS OR REPORTING 0 PSNC

SIUS IN SIGNIFICANT NONCOMPLIANCE
WITH SELF-MONITORING REQUIREMENTS 0 MSNC

SIUS IN SIGNIFICANT NONCOMPLIANCE
WITH SELF-MONITORING AND NOT
INSPECTED OR SAMPLED BY POTW 0 SNIN