

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Springdale

AFIN Number: 72-00003

NPDES Permit Number(s): AR0022063, AR0022063C

Program Tracked under NPDES Permit Number: AR0022063

Fact Sheet Preparation Date: None / Has summary sheets on some IUs.

Date of Last PCI/Audit: May 9, 2007 / June 11,12, 2003

Date of Last Annual Report: January 26, 2007 (12/1/05-11/30/06)

Name of Inspector: John Fazio

Date PCI Performed: December 20, 2007

Name, Title, and Telephone Number of Facility Representative:
Jennifer Enos, Pretreatment Manager, 479-756-3657

Name and Title of Other Participants: N/A

Number of IUs Visited: 2

Name(s) of IUs Visited: Kawneer Co., Inc; J.B. Hunt Transport, Inc.

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

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. No changes

2. Has ADEQ or EPA been notified of these changes? N/A

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes

4. What procedures are being used to update the IU Survey?
Survey water users, telephone listing, drive-by observations, survey new commercial water deposits

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) 15

6. Number of Categorical Industrial Users: 2

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Requesting official categorization by the ADEQ and reviewing the categorical standards in the Federal Register (40 CFR)

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category 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:
Kawneer Co., Inc.	Aluminum Forming	Anodizing and Painting Sub C Extrusion Part 476.45

Danaher Tool Group	Metal Finishing	Electroplating and Phosphating
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B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes; technical-based local limits are not needed to meet water quality standards since current discharge levels of the analytes in question are far below those required to meet the standards.

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

3. 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>1/quarter</u>	<u>1/quarter</u>	<u>Not required</u>	
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>Not required</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>Not required</u>	
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>Not required</u>	
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>Not required</u>	
Sludge:	<u>1/year</u>	<u>PCBs only</u>	<u>Not required</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

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? 15

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
IU reporting requirements: Yes

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:	Danaher Tool 2/month	
categorical IUs	<u>Kawneer 2/quarter</u>	<u>1/year</u>
other SIUs	<u>7/month to quarterly</u>	<u>1/year</u>
Inspection:		
categorical IUs	<u>At least 1/year</u>	<u>1/year</u>
other SIUs	<u>At least 1 year</u>	<u>1/year</u>

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

3. Are inspections announced or unannounced? **Unannounced**

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 waste streams, and discharge location of these waste streams: **Yes**

Inspection of the pretreatment facilities: **Yes**

Review of self-monitoring records: **Yes**

Observation of IU self-monitoring procedures: **Yes**

Verification that approved analytical techniques are used: **Yes**

Verification of IU flow measurement (where required): **Yes**

6. Overall adequacy of inspection documentation: **Satisfactory. See #19 below.**

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? All reports are marked date received. Ms. Enos reviews and verifies the reports and data. Compliance status no longer tracked by software, but by hand due to high level of compliance (per 4/27/07 correspondence w/ ADEQ).

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes

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?
All violations are responded to in accordance with the
Control Authority's Enforcement Response Plan. Action
depends on violation type and frequency.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR
403.12(b)?: N/A; no new Categorical IUs since early 1980s.

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: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling
procedures: Danaher Tool Group and Kawneer certify
monthly that they are TTO free rather than sampling for TTO
(sample for oil & grease in lieu of TTO sampling).

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes. Review of files document that enforcement response procedures reflect those outlined in the City's Enforcement Response Guide.

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

Effluent limitations: Informal notice, Notice of Violation(NOV)/Recurring exceedance-NOV, administrative order, cease and desist order, cost recovery, adm. fine, publication, revocation of permit and/or termination of service.

Late reports: Informal notice, NOV, publication, adm. order, show cause order.

Unpermitted discharges: Informal notice, Notice of Violation(NOV)/Recurring exceedance-NOV, administrative order, cease and desist order, cost recovery, adm. fine, publication, revocation of permit and/or termination of service.

Slug loads or spills: Informal notice, Notice of Violation(NOV)/Recurring exceedance-NOV, administrative order, cease and desist order, cost recovery, adm. fine, publication, revocation of permit and/or termination of service.

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)? Will publish in Morning News of Northwest Arkansas in January 2008.

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:
Danaher Tool Group, Inc.	T. Nickel limit recurring exceedances (last quarter last year; first quarter this year)	Compliance schedule (per administrative order)	10/22/07 - came into compliance

5. Comments on the POTW's enforcement procedures:
Satisfactory. The City is implementing the Enforcement Response Guide that is in their Pretreatment Program.

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: **One; J.B. Hunt Transport, Inc.**

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **Yes; by City Contract and by City Ordinance (Lowell).**

3. Does the POTW have copies of permits for IUs in other cities? **Yes, City of Springdale issues permit.**

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? **No**

5. Comments on multijurisdictional issues: **Satisfactory**

H. EVALUATION AND COMMENTS

City of Springdale:

Inadequate preservation of Table III metals. Composite sample begins at 0000 hours and ends at 2400 hours. Nitric acid preservative not added to sample until ~0800 hours the following morning when chemist staff arrives.

Kawneer Co., Inc.:

Not performing flow-meter accuracy checks properly. IU simply subtracting difference in head between primary and secondary flow measurement devices.

J.B. Hunt Transport, Inc:

pH buffers were expired at both outfall locations.

The Annual Industrial Pretreatment Report (12/01/06 - 11/30/07) is to list Danaher Tool Group in Significant Noncompliance.

The City's WWTP has a design flow of 24 MGD. The last average monthly flow for the calendar year was 11.3 MGD. In November, 2007, the contribution of wastewater from the SIUs was 36.8 %.

The pretreatment staff appeared to be very knowledgeable of the program and requirements. Ms. Enos appeared to thoroughly understand SIU facility layouts and treatment processes.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Kawneer Co., Inc.POTW Name: City of SpringdaleIndustry Contacts: Gregory Smith, Env. Health & Safety Mgr.Date and Time of Visit: December 20, 2007 1330 hours

Description of Manufacturing Process:

Aluminum Former - produce aluminum window frames from billets.
Aluminum is extruded, shaped, stretched, hardened, and anodized
or painted, if required. Frames assembled or shipped in pieces.

Sources of Process Wastewater:

1) Anodizing and 2) Chromium conversion (plating/surfacing).

Categorical Industry? YesBasis for Limits: Regulation (40 CFR)Point of Application: At discharge point

Description of Pretreatment Equipment and Procedures:

1. Anodizing: wastewater & die cleaning rinse overflow > pit #1 (pH adjust.) > pit#2
(mix) > pit#3 (mix & further pH adjust.). Wastewater > clarifier w/ polymer > sewer.
Solids & sludge batch processed. Cooling tower water discharged w/out pre-treatment.
2. Chromium conversion (Cr (VI) to Cr (III)): wastewater > mixing pit (conversion) >
caustic added to pH greater than 8. Solids flocculate in clarifier > pressed.
Supernatant > pit > sanitary sewer.

Spill Prevention and Solvent Management Procedures:

- Slug/spill evaluation checklist & certification.
- TTO - oil & grease monitoring in lieu of TTO monitoring.

IU certifies w/ monthly reports that there has been no dumping/
discharge to plant.

- Curbing/drains/cover prevents discharge to Waters of State.

Sampling Location and Equipment:

West side of building. ISCO 3710 FR Composite Sampler; ISCO
4230 Bubble Flow Meter. IU not conducting flow meter accuracy
check properly: IU simply subtracting recorded head from
calculated head.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: J.B. Hunt Transport, Inc.POTW Name: City of SpringdaleIndustry Contacts: Ron Weaver, Project Mgr.Date and Time of Visit: December 20, 2007 1520 hours

Description of Manufacturing Process:

N/A (clean trucks, rebuild engines, repair & service trucks, paint).

Sources of Process Wastewater:

Outfall #001 (north terminal): truck wash, parts wash, trailer rebuild.Outfall #002 (south terminal): parts wash, paint booth.Categorical Industry? NoBasis for Limits: Regulation (40 CFR)Point of Application: At discharge points

Description of Pretreatment Equipment and Procedures:

Settling pits > oil/water separators (coalescing plate separators) > pH adjustment.

Spill Prevention and Solvent Management Procedures:

Slug/spill evaluation checklist & certification.Pits are pumped and contents disposed of by Bub's, Inc.Parts washer solvents and spent paint disposed by Safety Kleen.Used oil and filters disposed by Shell Oil.Floor/surface drains transport any spills to pits.

Sampling Location and Equipment:

Grab samples taken at each outfall. pH buffers were expired.Flow not measured: oil & grease concentrations very low; POTW not concerned with loading at these concentrations.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>John Fazio</u>	
NAME OF FACILITY:	<u>City of Springdale</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022063</u>	NPID
DATE OF PCI:	<u>December 20, 2007</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>15</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>2</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>1 (standards)</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN

ADEQ

A R K A N S A S
Department of Environmental Quality

January 8, 2008

Rene Langston, Executive Director
City of Springdale
P.O. Box 769
Springdale, Arkansas 72765-0769

AFIN: 72-00003

NPDES Permit No.: AR0022063

Dear Mr. Langston:

On December 20, 2007, I performed a routine compliance evaluation inspection of the pretreatment program in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violation:

- The City has not been preserving quarterly Table III metals samples for influent and effluent in accordance with test procedures approved under 40 CFR Part 136. Twenty-four hour composite sample collection begins at 0000 hours and ends at 2400 hours. However, nitric acid preservative is not added to the samples until approximately 0800 hours the following morning when the lab operations staff arrives. This is in violation of Part III.7.C of your permit.

In addition, the following issues were noted at the Industrial Users visited on this date:

- Kawneer Co., Inc. has not been properly conducting their flow meter accuracy check. Kawneer simply calculates the difference in recorded and measured head in an attempt to measure flow meter accuracy. Recorded and calculated flow must be used in a percent error formula to ensure that the flow measurement device is capable of measuring flows with a maximum deviation of less than +/- 10 % from true discharge rates.
- The pH buffers at J.B. Hunt Transport, Inc. recently expired at both outfall locations.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch of this Department at the following address:

Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Rene Langston, City of Springdale
January 8, 2008
Page Two

This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by January 31, 2008.

For additional information you may contact the Enforcement Branch by telephone at 501-682-0639 or by fax at 501-682-0910. If I can be of any assistance, please contact me at 479-267-0811, ext. 16.

Sincerely,

A handwritten signature in black ink, appearing to read "John Fazio". The signature is stylized and cursive.

John Fazio
District 1 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

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 2 2 0 6 3 11 12 0 7 1 2 2 0 17 18 I 19 S 20 I					
Remarks					
A F I N 7 2 - 0 0 0 0 3					
Inspection Work Days	Facility Evaluation Rating	DI	QA	Reserved	
67 69	70 N	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 Springdale POTW 2910 Silent Grove Rd. Springdale, Arkansas	Entry Time/Date 0845 / 12-20-07	Permit Effective Date April 1, 2004
	Exit Time/Date 1620 / 12-20-07	Permit Expiration Date March 31, 2009
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jennifer Enos, Pretreatment Manager, 479-756-3657	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Langston, Executive Director, 479-751-5751 P.O. Box 769 Springdale, Arkansas 72765-0769	Rene 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	N	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	M	Pretreatment	N	Sampling
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water		Other:

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

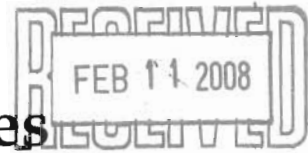
- The City has not been preserving quarterly Table III metals samples for influent and effluent in accordance with test procedures approved under 40 CFR Part 136. Twenty-four hour composite sample collection begins at 0000 hours and ends at 2400 hours. Nitric acid preservative is not added to the samples until approximately 0800 hours the next morning when the chemist staff arrives. This is in violation of Part III.7.C of your permit.
- Kawneer Co., Inc. has not been properly conducting their flow meter accuracy check. Kawneer simply calculates the difference in recorded and measured head in an attempt to measure flow meter accuracy. Recorded and calculated flow must be used in a percent error formula to ensure that the flow measurement device is capable of measuring flows with a maximum deviation of less than +/- 10 % from true discharge rates.
- The pH buffers at J.B. Hunt Transport, Inc. recently expired at both outfall locations.

Name(s) and Signature(s) of Inspector(s) John Fazio	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/ Fayetteville/ 479-267-0811/479-267-0819	Date 12/28/07
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

037548



Springdale Water Utilities



526 Oak Avenue P.O. Box 769 Springdale, Arkansas 72765-0769 (479) 751-5751

January 31, 2008

Mr. John Fazio
Water Division Enforcement Branch
Arkansas Dept. of Environmental Quality
5301 Northshore Dr.
North Little Rock, AR 72218-5317

Re: City of Springdale, Arkansas
NPDES Permit No. AR0022063
AFIN No. 72-00003

Dear Mr. Fazio:

Please accept this written response to your letter dated January 8, concerning the pretreatment compliance inspection performed on December 20, 2007.

Item No. 1 *"The City has not been preserving quarterly Table III metals samples for influent and effluent in accordance with test procedures approved under 40 CFR Part 136. Twenty-four hour composite sample collection begins at 0000 hour and ends at 2400 hours. However, nitric acid preservative is not added to the samples until approximately 0800 hours the following morning when the lab operations staff arrives. This is in violation of Part III.7.C of your permit."*

Response: Procedural changes now insure the preservation of all samples within 15 minutes of collection by Operations or Laboratory staff. Please note that only effluent samples were affected, since influent samples were collected from 1100 – 0900, and immediately preserved by laboratory staff. Also, effluent samples were collected from 0800 – 0800 until 2007, so delayed preservation only occurred during that year.

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Mr. John Fazio
January 31, 2008

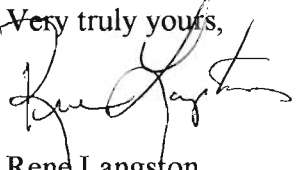
Item No. 2 *“Kawneer Co., Inc. has not been properly conducting their flow meter accuracy check. Kawneer simply calculates the difference in recorded and measured head in an attempt to measure flow meter accuracy. Recorded and calculated flow must be used in a percent error formula to ensure that the flow measurement device is capable of measuring flows with a maximum deviation of less than +/- 10 % from true discharge rates.”*

Response: Kawneer Co., Inc has a long history of complete compliance with all pretreatment program requirements. Their representatives were unaware of the need to convert flow from feet of head to gallons per minute when calculating % error. They have, since the inspection, modified their forms to include that calculation, and have further back-calculated previous calibrations to insure that they deviate by less than 10% from actual discharge rates.

Item No. 3 *“The pH buffers at J. B. Hunt Transport, Inc. recently expired at both outfall locations.”*

Response: J. B. Hunt Transport, Inc. immediately discarded all expired buffers and replaced them with new buffers. New forms provided by Springdale Water Utilities to all permitted discharging Industrial Users for reporting pH monitoring include a space for recording the expiration dates of buffers. This will help insure that new buffers are purchased before old ones expire, not just at this industry, but at all industries permitted by Springdale Water Utilities.

We trust the corrective measures taken will adequately address any concerns identified in your compliance reports.

Very truly yours,

Rene Langston
Executive Director

Cc: ADEQ, NPDES Enforcement Section
Harold Hull
Jennifer Enos