

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Kawneer Co., Inc.

Industry Contacts: Gregory Smith, Environmental Health & Safety Manager

Type of Industry: Metal Finisher SIC # 3423

Date of Visit: December 20, 2007

- 1. Significant industrial user: Yes No Not Determined
- 2. Pretreatment equipment or procedures? Yes No N/A
- 3. Pretreatment equipment maintained and operational? Yes No N/A
- 4. Hazardous waste generated or stored? Yes No N/A
- 5. Proper solid waste disposal? Yes No N/A
- 6. Solvent management/TTO control? Yes No N/A
- 7. Suitable sampling location? Yes No N/A
- 8. Appropriate self-monitoring procedures / equipment? Yes No N/A
- 9. Adequate spill prevention? Yes No N/A
- 10. Industry familiar with limits and requirements? Yes No N/A

Additional Comments: * Not performing flow meter accuracy check properly. Chromium sludge is disposed by Ashland Distribution, Garland, Texas. Paint sludge is disposed by Pollution Control Industries, Millington, Tennessee.

Visit Conducted By: John Fazio Date: December 28, 2007



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	2	
Remarks																													
0	0	2	C																										
Inspection Work Days				Facility Evaluation Rating				BI		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) Kawneer Co., Inc. (City of Springdale - AR0022063) 600 Kawneer Drive Springdale, Arkansas 72765		Entry Time /Date 1330 / 12-20-07	Permit Effective Date N/A
		Exit Time/Date 1500 / 12-20-07	Permit Expiration Date N/A
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Gregory Smith, Environmental Health & Safety Manager, 479-756-4444, 479-756-6398		Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Eric Vitunac, General Manager East, 770-449-5555 Kawneer Co., Inc. 555 Guthridge Court Norcross, Georgia 30092		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

N	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	Y	Pretreatment	N	Sampling
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water		Other:

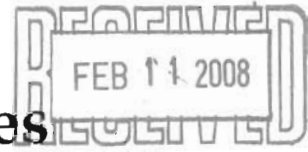
Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Facility is not performing flow meter accuracy check properly. Facility was overall satisfactory.

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 December 28, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date



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

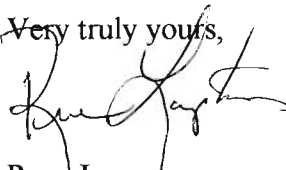
Item No. 2 *“Kawneer Co., Inc. has not been properly conducting their flow meter accuracy check. Kawneer simply calculates the difference in recorded and measured head in an attempt to measure flow meter accuracy. Recorded and calculated flow must be used in a percent error formula to ensure that the 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