

# ADEQ

ARKANSAS  
Department of Environmental Quality

received  
C. Noble 5/16/06

May 11, 2006

Mr. Craig Noble, General Manager  
City Corporation  
P.O. Box 3186  
Russellville, AR 72811-3186

RE: AFIN: 58-00105

NPDES Permit No.: AR0021768

Dear Mr. Noble:

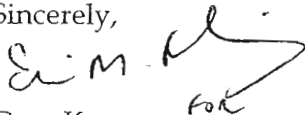
On April 20, 2006, I performed a routine pretreatment compliance inspection (PCI) of the Russellville Waste Water Treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. There was no documentation in the POTW's inspection reports noting that the Industrial User's self-monitoring records are being reviewed.
2. Taber Metals' sample location contained an overflow pipe which would divert process water to a creek on the south side of the plant in the event of a pump failure instead of to the sewer system.

The above items require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department. This response should contain 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 May 30, 2006.

If I can be any assistance, please contact me at 479-968-7339.

Sincerely,



Greg Kremers  
Field Inspector  
Water Division

cc: NPDES Branch

WATER DIVISION



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
N 2 5 3	A R 0 0 2 1 7 6 8	11 12 0 6 0 4 2 0 17	18 P	19 S 20	1
Remarks					
A F I N 5 8 -- 0 0 1 0 5 P O P E C O U N T Y					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 0 0 2 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) <b>Russellville WWTP (City Corporation)</b> 404 Jimmy Lile Road Russellville, AR 72802 Sec. 22, T7N, R20W	Entry Time /Date 0900 / 4-20-2005	Permit Effective Date April 1, 2005
	Exit Time/Date 1030 / 4-21-2005	Permit Expiration Date March 31, 2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Randy Bradley / Pretreatment coordinator / 479-968-2080 ext. 133	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Craig Noble, General Manager P.O. Box 3186 Russellville, AR 72811-3186 479-968-2080 ext. 113	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	M	Pretreatment	N	Sampling
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

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

**Pretreatment:** There was no documentation in facility's inspection reports that the IU's self-monitoring records are reviewed. City Corp. currently is in the process of bringing pretreatment staff levels to the required number as outlined in the facility's pretreatment program.

### SIU visited:

**Taber Extrusions** – There is an overflow pipe in the manhole where samples are collected. A pump inside the manhole pumps water to the sanitary sewer once water in the manhole reaches a certain height. If the pump fails to operate, treated process water would then be discharged to a creek on the south side of the plant via the overflow pipe.

**Trinity Industries** – No issues noted during evaluation.

Name(s) and Signature(s) of Inspector(s) Greg Kremers	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Russellville/ 479-968-7339/479-968-7321	Date May 2, 2006
ddw		
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: Russellville, AR

CSN Number: 58-00105

NPDES Permit Numbers: AR0021768

Program Tracked under NPDES Permit Number: AR0021768

Fact Sheet Preparation Date: 2004 & 2005

Date of Last PCI/Audit: May 19, 2005

Date of Last Annual Report: February 23, 2006

Name of Inspector: Greg Kremers

Date PCI Performed: April 20, 2006

Name, Title, and Telephone Number of Facility Representative:

Larry Collins, Plant Superintendent, 479-968-2080

Randy Bradley, PT Coordinator, 479-968-2080

Name and Title of Other Participants: N/A

Number of IUs Visited: 2

Name(s) of IUs Visited: Taber Extrusions & Trinity Fittings Group

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. None

2. Has ADPC&E 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?  
Mailing out of surveys or use of 25,000 gal. of water/day  
flags the POTW

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) 13

6. Number of Categorical Industrial Users: 3

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Based on 403 regulations, EPA regulations and the facility's program.

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:
<u>P.O.M.</u>	<u>metal finishing</u>	<u>phosphatizing rinse</u>
<u>Taber Metals</u>	<u>aluminum forming</u>	<u>contact cooling</u>
<u>Grace Mfg.</u>	<u>metal finishing</u>	<u>phosphatizing rinse</u>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADPC&E OR EPA? Yes, but these are currently being reevaluated.

2. Describe any apparent problems with the local limits.  
No apparent problems with technical based limits other than conventional BOD and TSS from some of the SIUs.

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>Once/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	
effluent	<u>Once/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	
sludge	<u>Once/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	
Organics:				
influent	<u>Once/year</u>	<u>1/Yr</u>	<u>N/A</u>	
effluent	<u>Once/year</u>	<u>1/Yr</u>	<u>N/A</u>	
sludge	<u>Once/year</u>	<u>1/Yr</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? Yes  
Tyson-Tyler Road - Anhydrous ammonia, billed \$10,148 for manpower & lab work. NOV issued. Issue is still ongoing to take corrective action.  
Premium Protein Products - Problems with ammonia. NOV issued. Environmental Mgr. with PPP trying to find solution to problem.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes
2. How many IU permits (or other control documents) have been issued? 13
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	<u>Yes</u>
type of sample	<u>Yes</u>
monitoring frequency	<u>Yes</u>
bypass prohibition	<u>Yes</u>
right of entry	<u>Yes</u>
nontransferability	<u>Yes</u>
revocation clause	<u>Yes</u>
penalty provisions	<u>Yes</u> )
slug load notification	<u>Yes</u>
notification of process change	<u>Yes</u>

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>2/yr</u>	<u>2/yr</u>
other SIUs	<u>2/yr</u>	<u>2/yr</u>
Inspection:		
categorical IUs	<u>2/yr</u>	<u>2/yr</u>
other SIUs	<u>2/yr</u>	<u>2/yr</u>

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

3. Are inspections announced or unannounced? 1/yr announced  
1/yr 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 wastestreams, and discharge location of these wastestreams Yes

Inspection of the pretreatment facilities Yes

Review of self-monitoring records Not noted in inspection report.

Observation of IU self-monitoring procedures Not usually

Verification that approved analytical techniques are used Records are kept as part of the BMR.

Verification of IU flow measurement (where required) Yes

6. Overall adequacy of inspection documentation: Report needs to show that IU's self monitoring records have been reviewed.

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, all pollutants at each sample

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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? PT coordinator keeps track with the use of an Excel Spread sheet.

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

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16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes. Notice of Violation is sent to the customer advising them of what was found.

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17. What are the POTW's procedures for following up violations?  
Notice of Violation requires a Corrective Action Plan  
within 30 days of receipt. The plan is reviewed and  
determined whether or not it is acceptable.

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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, for BMRs that were reviewed.

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: No new industries have been added. POTW keeps a regular update with it's IU surveys.

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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 Notice of Violation

Late reports Notice of Violation

Unpermitted discharges NOV with application form (unpermitted IU)

Slug loads or spills NOV & action order for slug prevention plan

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, once per year in local newspaper.

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>Eskimo Pie</u>	<u>BOD</u>	<u>NOV &amp; monetary</u>	<u>30 days</u>
<u>Tyson-Tyler Rd</u>	<u>BOD</u>	<u>NOV</u>	
<u>Taber Metals</u>	<u>O&amp;G</u>	<u>NOV</u>	
<u>P.O.M.</u>	<u>Failure to submit rpt</u>	<u>NOV</u>	<u>30 days</u>

5. Comments on the POTW's enforcement procedures:

None

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F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

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

No

2. Are staffing levels adequate? No, three personnel short.

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

Yes

G. MULTI JURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: None, but POTW looking into checking with what City of Dover is sending.

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: POTW has control of any IU hook-up by ordinance.



PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Taber Extrusions L.P.

POTW Name: Russellville, AR

Industry Contacts: Clint Hawkins, Plant Engineer

Date and Time of Visit: 4-20-06 1245

Description of Manufacturing Process: Manufacture of aluminum extrusions. Facility's products range from compound bow parts to items for the Department of Defense.

Sources of Process Wastewater:

Contact cooling water from presses and heat quench. Facility also discharges water from ultrasonic testing tank 1-2 times/yr.

Categorical Industry? Yes

Basis for Limits: Conventional base limits & regulations

Point of Application: Discharge point to city sewer

Description of Pretreatment Equipment and Procedures: 4000 gallon storage tank with internal oil/water separator.

Spill Prevention and Solvent Management Procedures:

Tank of caustic soda is located within facility. In the event of a spill, it is pumped to outside tank.

Sampling Location and Equipment: Process discharge collection sump, east of the machine shop.



## PPETS CODE SHEET

## PRETREATMENT COMPLIANCE INSPECTION (PCI)

	CODE
INSPECTOR'S NAME <u>Greg Kremers</u>	
NAME OF FACILITY <u>Russellville WWTP</u>	
PERMIT NUMBER USED TO TRACK PROGRAM <u>AR0021768</u>	NPID
DATE OF PCI <u>4-20-2006</u>	DTIA

## PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS) <u>13</u>	SIUS
NUMBER OF CATEGORICAL IUS <u>3</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>4</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

