

ADEQ

ARKANSAS
Department of Environmental Quality

received
6-15-07 RJ

June 6, 2007

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

Re: AFIN: 58-00105 NPDES Permit No. AR0021768

Dear Mr. Noble:

On May 22, 2007, I performed a routine pretreatment compliance inspection of your 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 that you are in compliance with terms of your permit.

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

Sincerely,



Greg Kremers
District 5 Field Inspector
Water Division

cc: Permits Branch
Enforcement Branch



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

NPDES Compliance Inspection Report

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

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 1 7 6 8	11 12 0 7 0 5 2 2	17 18 P	19 S 20	1
Remarks					
A F I N 5 8 --- 0 0 1 0 5					
Inspection Work Days		Facility Evaluation Rating		BI	QA
67 0 0 1 69		70 3		71 N	72 N 73
-----Reserved-----					
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) Russellville WWTP (City Corporation) 404 Jimmy Lile Road Russellville, AR 72802 Sec. 22, T7N, R20W	Entry Time /Date 0915 / 5-22-2007	Permit Effective Date April 1, 2005
	Exit Time/Date 1530 / 5-22-2007	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 Noble, General Manager Russellville City Corporation P.O. Box 3186 Russellville, AR 72811-3186 479-968-2080 ext. 113	Craig	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	S	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)

Reviewed areas of the pretreatment program were satisfactory.

SIU visited:

Innovation Industries, Inc. - This industry was chosen randomly from the POTW's latest surveys. The industry had responded to the survey that no discharges of process wastes were discharged to the POTW. The inspection was conducted to verify that claim. No discharges were found to indicate that Innovation Industries would be listed as an SIU.

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 June 6, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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

Name of Municipality: Russellville City Corporation

AFIN Number: 58-00105

NPDES Permit Number(s): AR0021768

Program Tracked under NPDES Permit Number: AR0021768

Fact Sheet Preparation Date: 2004 & 2005

Date of Last PCI/Audit: April 20, 2006

Date of Last Annual Report: March 15, 2007

Name of Inspector: Greg Kremers

Date PCI Performed: May 22, 2007

Name, Title, and Telephone Number of Facility Representative:
Randy Bradley, Pretreatment Coordinator 479-968-2080 ext. 133

Name and Title of Other Participants: None

Number of IUs Visited: 1

Name(s) of IUs Visited: Innovation Industries, 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.

Form approved July 1989

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 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?
Mailing out of surveys or use of 25,000 gallons 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 (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:
P.O.M.	Metal finishing	Phosphatizing rinse
Taber Metals	Aluminum forming	Contact cooling
Grace Manufacturing	Metal finishing	Phosphatizing rinse

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes. Facility is currently awaiting decision by ADEQ and EPA on allowing discharge to Arkansas River instead of Whig Creek.

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>N/A</u>	
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>N/A</u>	
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>N/A</u>	
Sludge:	<u>1/year</u>	<u>1/year</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

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? 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. Facility has new permits on hand but as of this inspection had yet to send to industries.
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:		
categorical IUs	<u>2/year</u>	<u>2/year</u>
other SIUs	<u>2/year</u>	<u>2/year</u>
Inspection:		
categorical IUs	<u>2/year</u>	<u>2/year</u>
other SIUs	<u>2/year</u>	<u>2/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? 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 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: Contract lab

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Updated inspection form is 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). All parameters are sampled each time.
-
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Contract lab performs sampling.
-
9. Are sampling and flow monitoring equipment properly maintained? Yes
-
10. Is the POTW keeping proper field notes and chain of custody forms? Contract lab
-
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
-
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes. Notice of violation is sent to the IU advising them of what was found along with a corrective action plan.
-

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 by the POTW and determined whether or not it is acceptable.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?: N/A

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR: (No actual BMR. Surveys serve as 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: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures: All based on 40 CFR 403.12

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, usually in February. Printed 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</u>	<u>30 days</u>
<u>DANA Corp.</u>	<u>pH</u>	<u>NOV</u>	<u>30 days</u>
<u>Taber Extrusions</u>	<u>Oil & grease</u>	<u>NOV</u>	<u>30 days</u>
<u>Premium Protein Prod.</u>	<u>NH3</u>	<u>NOV</u>	<u>30 days</u>

5. Comments on the POTW's enforcement procedures:

None

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? More now than in past.

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 facility is looking into possible IUs in Dover, AR

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 other 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: None

H. EVALUATION AND COMMENTS

Since last PCI, City Corp has hired an additional lab technician and an operations assistant. Currently still trying to hire an engineer to satisfy the requirements of the PT program. The engineer position would only devote 5% of allotted time to the pretreatment program.

Overall, program appears to be satisfactory in the reviewed areas.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Innovation Industries, Inc.

POTW Name: Russellville City Corp WWTP

Industry Contacts: Tom Less

Date and Time of Visit: May 22, 2007

Description of Manufacturing Process:
Manufacture of elevator control panels

Sources of Process Wastewater:
Degreaser tank. This wastewater is not discharged but is recycled.

Categorical Industry? No

Basis for Limits: N/A

Point of Application: N/A

Description of Pretreatment Equipment and Procedures:
N/A

Spill Prevention and Solvent Management Procedures:
No drains located near source.

Sampling Location and Equipment:
N/A

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

INSPECTOR'S NAME:	<u>Greg Kremers</u>	CODE
NAME OF FACILITY:	<u>Russellville City Corp WWTP</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021768</u>	NPID
DATE OF PCI:	<u>May 22, 2007</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