



ARKANSAS
Department of Environmental Quality

January 27, 2009

Mr. Larry Waldrop, General Manager
El Dorado Water Utilities
P.O. Box 1587
El Dorado, AR 71731

RE: Pretreatment Compliance Inspection

AFIN: 70-00341

NPDES Permit No.: AR0033723

Dear Mr. Waldrop:

On December 18 and 19, 2008, I performed a pretreatment compliance inspection of the El Dorado Water Utilities 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:

1. The facility had not submitted written certification within 60 days of the effective date of the permit that a technical evaluation demonstrating that the existing technical based local limits are based on current water state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment system, workers health and safety problems, and sludge contamination as required by Part III, item 9b.

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

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 February 20, 2009.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910

It was also noted during the inspection, that the Pilgrim's Pride Hatchery had waste water bypassing the City's collection system. Specifically, equipment washing just down slope of collection grates which are tied to the City's collection system.

The Pilgrim's Pride bypass was also noted by Mr. John Peppers as part of an inspection performed during the pretreatment compliance inspection. Therefore, this bypass is being forwarded to the El Dorado Water Utilities for follow up and/or enforcement. The El Dorado Water Utilities should address the above item using standard protocol as described in the pretreatment program. At this time, a written response to this bypass is not required to be submitted to the Department, pending review by the ADEQ Pretreatment staff.

If I can be of any assistance, please contact me at 870-682-0680.

Sincerely,

A handwritten signature in black ink that reads "John W. Lamb". The signature is written in a cursive, slightly slanted style.

John W. Lamb
District 8 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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 8 1 2 1 8 17 18 P 19 S 20 1	Remarks				
Inspection Work Days		Facility Evaluation Rating		BI QA -----Reserved-----	
67 0 0 3 C 69	70 4	71 N 72 N 73 74 75 80			

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) City of El Dorado El Dorado Pretreatment Program	Entry Time/Date 13:10/12/18/2008	Permit Effective Date 01 October 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) John Peppers/Pretreatment Coordinator/870-862-6951	Exit Time/Date 12:10/12/19/2008	Permit Expiration Date 30 September 2013
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 checked="" type="checkbox"/> No <input type="checkbox"/>	Other Facility Data

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 facility had not submitted written certification within 60 days of the effective date of the permit that a technical evaluation demonstrating that the existing technical based local limits are based on current water state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment system, workers health and safety problems, and sludge contamination.

The program is still operating very smoothly. The staff will be required to make some modification to the program over the year. The City continues to do the sampling for the industries, (expect pH for Miller Transport).
 An IU inspection of the Pilgrim's Pride Hatchery revealed a wastewater bypassing the collection system from outside wash down. This was also observed by Mr. John Peppers and is being referred to the facility for follow up.

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 27 January 2009
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: 11 & 12 December 2007 PCI

Date of Last Annual Report: March 2008 for Jan-Dec 2007

Name of Inspector: John W. Lamb

Date PCI Performed: 18 & 19 December 2008

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

Name and Title of Other Participants: N/A

Number of IUs Visited: 3

Name(s) of IUs Visited: Pilgrims Pride Hatchery, Union Medical Center, Americable

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?
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:
<u>Prescolite Reflector</u>	<u>Metal Finishing</u>	<u>Anodizing</u>
<u>Milbank</u>	<u>Metal Finishing</u>	<u>Phosphatizing</u>
<u>Miller Transport</u>	<u>Trans equip cleaning</u>	<u>Equip. cleaning</u>

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 Permit:	Program:	Comments:
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 (low level quarterly)</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. Peppers.

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>	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

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. The city sends emails to the permittees when an issue comes up. The city then keeps copies of the email records.

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. MULTI JURISDICTIONAL 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. However since the new permit was issued in October 2008, the facility will have to make some modification to the program within the next twelve months. The facility should work to keep these new deadlines. One issue has already made it past the deadline. The facility had not submitted written certification within 60 days of the effective date of the permit that a technical evaluation demonstrating that the existing technical based local limits are based on current water state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment system, workers health and safety problems, and sludge contamination as required by Part III, item 9b of the new permit

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: 19 December 2008/9:45

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: Americable

POTW Name: City of El Dorado

Industry Contacts: Chad Thorton

Date and Time of Visit: 19 December 2008 10:27

Description of Manufacturing Process: Manufacturing of wire and cable

Sources of Process Wastewater: cooling rinse

Categorical Industry? NO

Basis for Limits: N/A

Point of Application: N/A

Description of Pretreatment Equipment and Procedures:
none

Spill Prevention and Solvent Management Procedures:
n/a

Sampling Location and Equipment: Manhole east side of plant, near back entrance.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Union Medical Center

POTW Name: City of El Dorado

Industry Contacts: Terry Martin

Date and Time of Visit: 19 December 2008 09:10

Description of Manufacturing Process: Hospital, with ex-rays

Sources of Process Wastewater:
None since the hospital has gone to using digital images instead of silver film.

Categorical Industry? no

Basis for Limits: N/A

Point of Application: N/A

Description of Pretreatment Equipment and Procedures: none since the facility has stopped using silver film in ex-rays.

Spill Prevention and Solvent Management Procedures:
n/a

Sampling Location and Equipment: manhole just west of ER entrance.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

	CODE
INSPECTOR'S NAME <u>John W. Lamb</u>	
NAME OF FACILITY <u>City of El Dorado</u>	
PERMIT NUMBER USED TO TRACK PROGRAM <u>AR0033723</u>	NPID
DATE OF PCI <u>18 & 19 2008</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS) <u>07</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>0</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

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Pilgrim's Pride Hatchery


Industry Contacts: William Bovee

Type of Industry: Chicken hatchery

Date of Visit: 19 December 2009

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

Additional Comments: The POTW does all the sampling and analysis for this industry.
See page 1 for additional comments

Visit Conducted By: John W. Lamb  Date: 27 January 2009

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Union Medical Center


Industry Contacts: Terry Martin

Type of Industry: Hospital

Date of Visit: 19 December 2009

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

Additional Comments: The POTW does all the sampling and analysis for this industry.
See page 1 for additional comments

Visit Conducted By: John W. Lamb  Date: 27 January 2009



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

Form Approved
OMB No. 2040-0003

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] [3] [3] [7] [2] [3]	11 12 [0] [8] [1] [2] [1] [9]	17 18 [I]	19 [S]	20 [2]	
Remarks					
[0] [0] [3] [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 (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Americable 350 Bailey Road El Dorado, AR (City of El Dorado-South-AR0033723)	Entry Time/Date 10:27/12/19/08	Permit Effective Date 01 October 2008
	Exit Time/Date 10:45/12/19/08	Permit Expiration Date 30 September 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) John Pepper/Pretreatment Coordinator/City of El Dorado	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Chad Thorton Americable 350 Bailey Road El Dorado, AR 71730	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

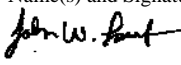
Section C: Areas Evaluated During Inspection

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

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

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

This inspection done as part of a Pretreatment Compliance Inspection of the City of El Dorado.

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 27 January 2009
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Americable


Industry Contacts: Chad Thorton

Type of Industry: wire and cable manufacturing

Date of Visit: 19 December 2009

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

Additional Comments: The POTW does all the sampling and analysis for this industry.
See page 1 for additional comments

Visit Conducted By: John W. Lamb  Date: 27 January 2009

043690
2-20-09

70-00341



El Dorado Water Utilities

500 NORTH WASHINGTON • P. O. BOX 1587 • EL DORADO, AR 71731 (870) 862-6451

February 19, 2009

Ms. Ann Roberts
Enforcement Administrator
Water Division
Arkansas Dept. of Environmental Quality (ADEQ)
5301 Northshore Drive
North Little Rock, AR 72118



Re: AR 0033723 Pretreatment Compliance Inspection

Dear Ms. Roberts:

The attached letter is sent in response to the compliance inspection performed on December 18 and 19, 2008 by Mr. John Lamb, District 8 Field Inspector Water Division. The inspection revealed that the written certification required by Part III, item 9b had not been submitted. Upon my return to work following a two month absence for open heart surgery I was informed of this omission by Mr. Allen Gilliam on January 26, 2009 the attached letter was mailed to your office on January 27, 2009.

Please feel free to contact me with any questions. (870) 862-6451.

Very Truly Yours,

A handwritten signature in black ink that reads "T. Harold Baker". The signature is written in a cursive style.

T. Harold Baker
Treatment Superintendant
El Dorado Water Utilities

El Dorado Water Utilities



500 NORTH WASHINGTON • P. O. BOX 1587 • EL DORADO, AR 71731 (870) 862-6451

January 27, 2009

Ms. Ann Roberts
Enforcement Administrator
Water Division
Arkansas Dept. of Environmental Quality (ADEQ)
5301 Northshore Drive
North Little Rock, AR 72118

Re: AR 0033723 & AR 0033936 Technically Based local limits certification

Dear Ms. Roberts,

As required by Part III (b) of the above mentioned permits, we have preformed a technical evaluation demonstrating that existing technically based maximum headworks loadings (MAHL) are based on current state water quality standards.

We are certifying that the MAHL's currently in the Pretreatment Program are based on current water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment facility and local limits are not necessary at this time.

Please feel free to contact me with any questions. (870) 862-6451.

Very Truly Yours,

A handwritten signature in cursive script that reads "T. Harold Baker".

T. Harold Baker
Treatment Superintendant
El Dorado Water Utilities