

# ADEQ

ARKANSAS  
Department of Environmental Quality

May 5, 2009

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

RE: Inspection of the Pretreatment program

NPDES Permit No.: AR0021768

AFIN: 58-00105

Dear Mr. Noble:

On April 23, 2009, 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 the terms of your permit.

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

Sincerely,



Amy Beck  
District 5 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits 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
1 N 2 5 3 A R 0 0 2 1 7 6 8 11 12 0 9 0 4 2 3 17 18 P 19 S 20 1					
Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 0 0 1 69	70 3	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	Entry Time/Date 0730 / 04-23-2009	Permit Effective Date 4/1/2005
	Exit Time/Date 1200 / 04-23-2009	Permit Expiration Date 3/31/2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Randy Bradley/ Pretreatment Coordinator</b> Phone: (479) 968-2080 ext. 133 Fax: (479) 968-3265	Other Facility Data 35° 14' 57" N, 93° 06' 58" W	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Craig Noble, (479) 968-2080 ext. 113</b> <b>RUSSELLVILLE CITY CORPORATION</b> P.O. Box 3186 Russellville, AR 72811	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	Sampling
N	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	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. The facilitator maintains very organized records.

### Industrial Users visited:

- Sugar Creek Foods
- Firestone Tire and Rubber

Name(s) and Signature(s) of Inspector(s) <b>Amy Beck</b>	Agency/Office/Telephone/Fax <b>AR Dept. of Environmental Quality-Jonesboro</b> (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date <b>May 4, 2009</b>
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 City Corporation**

AFIN Number: **58-00105**

NPDES Permit Number(s): **AR0021768**

Program Tracked under NPDES Permit Number: **AR0021768**

Fact Sheet Preparation Date: **2007**

Date of Last PCI/Audit: **2008**

Date of Last Annual Report: **February 2009**

Name of Inspector: **Amy Beck**

Date PCI Performed: **April 23, 2009**

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

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Name and Title of Other Participants: \_\_\_\_\_  
**Dale Washam, ADEQ Inspector Supervisor; Greg Kremers, ADEQ PC**  
**Inspector**

Number of IUs Visited: **2**

Name(s) of IUs Visited: **Sugar Creek Foods International,**  
**Firestone Tire & Rubber**

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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.**

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. In the process of permitting one SIU in Dover. New SIU is named ACC - Aqua Contour Cutting
- 2. Has ADEQ or EPA been notified of these changes? NA
- 3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes
- 4. What procedures are being used to update the IU Survey? Review of new water hook-ups, new industrial and commercial water accounts, mail out of surveys, designated individual to survey Dover for SIU.
- 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:
<b>P.O.M.</b>	<b>Metal finishing</b>	<b>Phosphatizing rinse</b>
<b>Taber Metals</b>	<b>Aluminum forming</b>	<b>Contact cooling</b>
<b>Grace Manufacturing</b>	<b>Metal finishing</b>	<b>Phosphatizing rinse</b>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? The facility has updated the local limits and is awaiting approval from the Department.

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

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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>NA</u>	
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>NA</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>NA</u>	
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>NA</u>	
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>NA</u>	
Sludge:	<u>1/year</u>	<u>1/year</u>	<u>NA</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.

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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, all SIUs have current permits

4. Does the control document contain the following items? (P.O.M., Grace Manufacturing, and Taber Extrusion permits examined)  
 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: reviewed prior to inspection

Observation of IU self-monitoring procedures: Contract lab used

Verification that approved analytical techniques are used: yes

Verification of IU flow measurement (where required): yes

6. Overall adequacy of inspection documentation: Need to add specific discharge/sample location to the inspection form.

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.
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8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Certified contract lab used.
- 
9. Are sampling and flow monitoring equipment properly maintained? Yes, sampling bottle cleaned after each use, pH meter calibrated each use.
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10. Is the POTW keeping proper field notes and chain of custody forms? Chain of Custody need to be more specific on parameters analyzed ("metals" not specific enough).
- 
11. Is the sampling location representative of the discharge to the collection system? yes
- 
12. Are sampling locations identified in POTW records? Yes, but need to be more specific, facility name not specific enough.
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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? Pretreatment coordinator keeps track with the use of an ops system for tracking and an Excel spreadsheet.
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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.
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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 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)? NA

Review a Baseline Monitoring Report from the POTW's file,  
 and indicate which of the following items can be identified  
 in the BMR: **No new categorical SIUs.**

Name and address: NA

Other environmental permits held: NA

Description of operations: NA

Process flow diagrams: NA

Flow measurements: NA

Measurements of regulated pollutants: NA

Certification of compliance by the IU: NA

Compliance schedule (if needed): NA

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

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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: Notice of violation

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

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, printed in the 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.

**No significant violators in the last 12 months.**

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:  
Reduction of violations since the last pretreatment inspection suggests the procedures are affective.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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, but not the same as the program.  
\_\_\_\_\_
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: ACC located in Dover is in the process of being permitted.  
\_\_\_\_\_
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? yes  
\_\_\_\_\_
3. Does the POTW have copies of permits for IUs in other cities? NA  
\_\_\_\_\_
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? NA  
\_\_\_\_\_
5. Comments on multijurisdictional issues: none  
\_\_\_\_\_  
\_\_\_\_\_

H. EVALUATION AND COMMENTS

Take care that chain of custody forms are completely filled out when sampling SIUs. The preservation techniques used and the specific parameters to be analyzed are not always noted on the chain of custody, see POM dated 3-27-09 and Grace Manufacturing dated 10-15-08.

At permit renewal for Grace Manufacturing, remove flow meter requirement.

Septic tank pumpers are not accepted at the time of inspection.

Grease trap program has been implemented (not run by pretreatment).

Pretreatment records are well organized.

Be specific on sampling locations, avoid using the facility name as the sample location.

Continue local limit update and permitting of the industry in Dover.

Add "Review of facility monitoring records" to the pretreatment inspection reports.

The program is satisfactory in the reviewed areas.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Sugar Creek Foods

POTW Name: Russellville City Corp WWTP

Industry Contacts: Scott Van Horn - Owner

Date and Time of Visit: April 24, 2009; 0930

Description of Manufacturing Process:  
This facility manufactures ice cream and yogurt mixes.

Sources of Process Wastewater:  
All drains in the plant go directly to the WWTP.

Categorical Industry? no

Basis for Limits: Oil and grease limits needed to control heavy cream products produced.

Point of Application: NA

Description of Pretreatment Equipment and Procedures:  
This industry does not have pretreatment capabilities.

Spill Prevention and Solvent Management Procedures:  
Chemicals/solvents are stored in designated areas. Spill kits are kept in each storage area.

Sampling Location and Equipment:  
City or contract lab samples at the man hole on the north side of the facility.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Firestone Tire and Rubber

POTW Name: Russellville City Corp WWTP

Industry Contacts: Lorrie Chesser - Safety Manager

Date and Time of Visit: April 24, 2009; 1045

Description of Manufacturing Process:  
This facility manufactures various sized of tire inner tubes.

Sources of Process Wastewater:  
Select drains in the plant go to the WWTP.

Categorical Industry? no

Basis for Limits: Oil and chemicals used to make product.

Point of Application: NA

Description of Pretreatment Equipment and Procedures:  
The facility continuously operates an oil separator before discharging to the WWTP.

Spill Prevention and Solvent Management Procedures:  
There are no drains in proximity to the chemical/solvent storage areas.

Sampling Location and Equipment:  
City or contract lab samples at the man hole northwest of the building.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Amy Beck</u>	
NAME OF FACILITY:	<u>Russellville City Corp WWTP</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021768</u>	NPID
DATE OF PCI:	<u>April 24, 2009</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>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