

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

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Name of Municipality: City of Springdale

AFIN Number: 72-00003

NPDES Permit Number(s): AR0022063, ARR00C376

Program Tracked under NPDES Permit Number: AR0022063

Fact Sheet Preparation Date: None / Has summary sheets on some IUs.

Date of Last PCI/Audit: December 20, 2007 / September 23-25, 2008

Date of Last Annual Report: January 28, 2010 (12/01/08 - 11/30/09)

Name of Inspector: John Fazio

Date PCI Performed: May 27, 2010

Name, Title, and Telephone Number of Facility Representative:  
Jennifer Enos, Pretreatment Manager, 479-756-3657  
Josh Weaver, Laboratory Technician, 479-756-3657

Name and Title of Other Participants: N/A

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Number of IUs Visited: 2

Name(s) of IUs Visited: Cintas Corporation; J.B. Hunt Transport, Inc.

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. <b>Tyson Foods, Inc - Hog Trailer Wash closed and removed January 2010.</b>	
2.	Has ADEQ or EPA been notified of these changes?	<b>Yes</b>
3.	<b>HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?</b>	<b>Yes</b>
4.	What procedures are being used to update the IU Survey? <b>Survey water users, telephone listing, drive-by observations, survey new commercial water deposits, industry water consumption review, RCRA notification to doctor's offices, photo processors, etc.</b>	
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)	<b>15</b>
6.	Number of Categorical Industrial Users:	<b>2</b>
7.	How does the POTW determine the appropriate categorical standards to apply to an IU? <b>Requesting official categorization by the ADEQ and reviewing the categorical standards in the Federal Register (40 CFR)</b>	
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:
	<b>Kawneer Co., Inc.</b>	<b>Aluminum Forming</b>
		<b>Regulated Process:</b>
		<b>Anodizing and Painting Sub C Extrusion Part 476.45</b>
	<b>Danaher Tool Group</b>	<b>Metal Finishing</b>
		<b>Electroplating and Phosphating</b>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? No; technically-based local limits are not needed to meet water quality standards since current discharge levels of the analytes in question are far below those required to meet the standards.

2. Describe any apparent problems with the local limits.  
N/A

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>Not required</u>	
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>Not required</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>Not required</u>	
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>Not required</u>	
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>Not required</u>	
Sludge:	<u>1/year</u>	<u>PCBs only</u>	<u>Not required</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? 15 (plus an additional 4 for non-dischargers, and 1 for Tontitown landfill (leachate disposal at POTW))
  
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

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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:	<b>Danaher Tool 2/month</b>	
categorical IUs	<u><b>Kawneer 2/quarter</b></u>	<u><b>1/year</b></u>
other SIUs	<u><b>7/month to quarterly</b></u>	<u><b>1/year</b></u>
Inspection:		
categorical IUs	<u><b>At least 1/year</b></u>	<u><b>1/year</b></u>
other SIUs	<u><b>At least 1 year</b></u>	<u><b>1/year</b></u>

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

3. Are inspections announced or unannounced? **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 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: **Yes, unless 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: **Satisfactory**

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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

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8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes

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9. Are sampling and flow monitoring equipment properly maintained? Yes

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10. Is the POTW keeping proper field notes and chain of custody forms? Yes

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11. Is the sampling location representative of the discharge to the collection system? Yes

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12. Are sampling locations identified in POTW records? Yes

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13. Are sampling services available in an emergency? Yes

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14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMRs, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? All reports are marked date received. Ms. Enos reviews and verifies the reports and data. Compliance status no longer tracked by software, but by hand due to high level of compliance (per 4/27/07 correspondence w/ ADEQ).

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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

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16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes

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17. What are the POTW's procedures for following up violations?  
All violations are responded to in accordance with the  
Control Authority's Enforcement Response Plan. Action  
depends on violation type and frequency.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR  
403.12(b)?: N/A; no new Categorical IUs since early 1980s.

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: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

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: See item H below.

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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. Review of files document that enforcement response procedures reflect those outlined in the City's Enforcement Response Guide.

2. How does the POTW respond to the following violations?

Effluent limitations: Informal notice, notice of violation (NOV)/recurring exceedance-NOV, administrative order, cease and desist order, cost recovery, adm. fine, publication, revocation of permit and/or termination of service.

Late reports: Informal notice, NOV, publication, adm. order, show cause order.

Unpermitted discharges: Informal notice, notice of violation, administrative order, cease and desist order, cost recovery, adm. fine, publication, revocation of permit and/or termination of service.

Slug loads or spills: Informal notice, notice of violation, administrative order, cease and desist order, cost recovery, adm. fine, publication, revocation of permit and/or termination of service.

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, when necessary. No Significant Violators since date of last PCI.

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>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>



5. Comments on the POTW's enforcement procedures:  
**Satisfactory. The City is implementing the Enforcement Response Guide contained in their Pretreatment Program.**
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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? **Yes**
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2. Are staffing levels adequate? **Yes**
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3. Are the responsible officials familiar with the approved program? **Yes**
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G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: **One; J.B. Hunt Transport, Inc.**
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2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **Yes; by City Contract and by City Ordinance (Lowell).**
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3. Does the POTW have copies of permits for IUs in other cities? **Yes, City of Springdale issues permit.**
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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? **No**
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5. Comments on multijurisdictional issues: **Satisfactory**
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H. EVALUATION AND COMMENTS

City of Springdale:

The pretreatment staff is very knowledgeable of the program and requirements. Mrs. Enos and Mr. Weaver have a thorough understanding of the SIU facility layouts and the SIU's pretreatment processes.

The POTW conducted 633 SIU sampling visits during the period of December 1, 2008 through November 30, 2009. This number far exceeds the sampling frequency required by their program.

No SIUs were found to be in Significant Noncompliance.

Cintas Corporation:

IU's contract laboratory indicates on the chain-of-custody forms that oil & grease samples are non-preserved. However, it was verified during the IU site visit that the oil & grease sample bottles provided to the IU by the contract lab contain sulfuric acid.

In addition, on the BOD, TP and TSS chain-of-custody forms, the contract laboratory simply lists the preservation methods used; the documentation on these forms is not specific as to which preservation method(s) is used for each parameter. The POTW will contact the contract lab regarding these documentation issues.

No other issues were noted. The facility appears to be operated in accordance with the requirements of their permit.

J.B Hunt Transport, Inc.:

No issues were noted. The facility appears to be operated in accordance with the requirements of their permit.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Cintas Corporation

POTW Name: City of Springdale

Industry Contacts: Aaron Dickinson, Plant Manager

Date and Time of Visit: May 27, 2010 1350 hours

Description of Manufacturing Process:  
N/A (soiled laundry is sorted, weighed, washed, sorted and loaded onto delivery trucks).

Sources of Process Wastewater:  
Effluent from washing machines

Categorical Industry? No

Basis for Limits: Springdale Sewer Use Ordinance #2842

Point of Application: At discharge point

Description of Pretreatment Equipment and Procedures:  
Process Water → Pit #1 → Shaker Screen → Pit #2 → Heat Exchanger → Two Settling Tanks - pH Adjustment in second settling tank → Solids removal in DAF Unit → Sanitary Sewer. Screened material and sludge to dumpster and hauled to WMI landfill.

Spill Prevention and Solvent Management Procedures:  
No Solvents used. City determined that no slug control plan is necessary. Secondary containment for chemicals of concern.

Sampling Location and Equipment:  
Outfall 001: Parshall Flume on south side of facility's lot on N. Monitor Rd., west of sampling building. Bubble meter and refrigerated auto-sampler.

## PRETREATMENT COMPLIANCE INSPECTION

## IU SITE VISIT FORM

Name of Industry: J.B. Hunt Transport, Inc.POTW Name: City of SpringdaleIndustry Contacts: Ron Weaver, Project Mgr.Date and Time of Visit: May 27, 2010 1440 hours

Description of Manufacturing Process:

N/A (clean trucks, rebuild engines, repair & service trucks, paint).

Sources of Process Wastewater:

Outfall #001 (north terminal): truck wash, parts wash, trailer rebuild.Outfall #002 (south terminal): parts wash, paint booth.Categorical Industry? NoBasis for Limits: Springdale Sewer Use Ordinance #2842Point of Application: At discharge points

Description of Pretreatment Equipment and Procedures:

3 Oil/Water Separators (Coalescing Plate Separators) → Settling Pits for Sand/Grit Removal → pH Adjustment → Sanitary Sewer

Spill Prevention and Solvent Management Procedures:

City determined that no slug control plan is necessary.Pits and oil/water separators contents disposed by Pollution Management, Inc.Parts washer solvents and spent paint disposed by Safety Kleen.Used oil and filters disposed by Shell Oil.Floor/surface drains transport any spills to settling pits.

Sampling Location and Equipment:

Continuous pH monitoring after final treatment. Grab samples taken at each outfall.Flow not measured: oil & grease concentrations very low; POTW not concerned with loading at these concentrations.

## PPETS CODE SHEET

## PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>John Fazio</u>	
NAME OF FACILITY:	<u>City of Springdale</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022063</u>	NPID
DATE OF PCI:	<u>May 27, 2010</u>	DTIA

## PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>15</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>2</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