

# ADEQ

ARKANSAS  
Department of Environmental Quality

*April 18, 2011*

*Ken Johnson, Manager  
Pine Bluff Wastewater Utilities  
1520 Ohio Street  
Pine Bluff, Arkansas 71601-6055*

*Re: AFIN: 35-00149      NPDES Permit No. AR0033316*

*Dear Mr. Johnson:*

*On March 16, 2011, I conducted a routine inspection of your Pretreatment Compliance Program 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 (870) 247-5155.*

*Sincerely,*



*Steven L. Henderson  
District 6 Inspector  
Water Division*

*cc:   Permits Branch  
      Enforcement Branch*



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   <b>N</b>   2   5   3   <b>A</b>   <b>R</b>   0   0   3   3   3   1   6   11   12   1   1   0   3   1   6   17   18   <b>P</b>   19   <b>S</b>   20   1					
Remarks					
<b>A</b>   <b>F</b>   <b>I</b>   <b>N</b>       3   5   -   0   0   1   4   9					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67   0   0   1   69	70   <b>N</b>	71   <b>N</b>	72   <b>N</b>	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>Pine Bluff Wastewater Utility – Boyd Point East of Hwy 79N, South of the Arkansas River Pine Bluff, Arkansas Jefferson County</b>	Entry Time/Date ~ 0900 3/16/2011	Permit Effective Date <b>September 1, 2009</b>
	Exit Time/Date ~ 1500 3/16/2011	Permit Expiration Date <b>August 31, 2014</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Vincent Miles, Plant Superintendent (870) 535-0828 Fax (870) 535-6243 Stacey Carpenter, Lab Technician</b>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Ken Johnson, Manager Pine Bluff Wastewater Utilities 1520 Ohio Street Pine Bluff, Arkansas 71601-6055</b>	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)

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

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

***A Pretreatment Inspection was conducted at Pine Bluff Wastewater Utility to determine compliance status with the requirements of the General Pretreatment Regulations of 40 Code of Federal Regulations (CFR) Part 403. At the time of this inspection, the facility appeared to be compliant with the applicable regulations.***

Name(s) and Signature(s) of Inspector(s) Steven L. Henderson	Agency/Office/Telephone/Fax ADEQ/ Stuttgart/ (870) 247-5155/ (870) 247-5185	Date March 24, 2011
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 Pine Bluff Wastewater Utility

AFIN Number: 35-00149

NPDES Permit Numbers: AR0033316

Program Tracked under NPDES Permit Number: AR0033316

Fact Sheet Preparation Date: n/a

Date of Last PCI: December 3, 2007

Date of Last Annual Report: March 15, 2011

Name of Inspector: Steven L. Henderson

Date PCI Performed: March 16, 2011

Name, Title, and Telephone Number of Facility Representative: Vincent Miles, Plant Superintendent (870) - 535 - 0828

Name and Title of Other Participants: Stacey Carpenter, Senior Lab Technician

Number of IUs Visited: 3

Name(s) of IUs Visited: Planters Cotton Oil Mill, Union Pacific Railroad, Aramark

**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.**

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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.

NA

2. Has ADEQ or EPA been notified of these changes? NA
3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? YES
4. What procedures is being used to update the IU Survey? Water meter records, permit applications, field surveillance, Jefferson Co. Industrial Foundation, questionnaires, inspections by city inspectors. Also linked to United Water Company (city water ) via Internet.
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) 10
6. Number of Categorical Industrial Users: 4
7. How does the POTW determine the appropriate categorical standards to apply to an IU? AMSA, Federal Regulations, SIC codes
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:

Stant

Metal Finishing 433

Zn plating

Central Moloney coat.

Metal Finishing 433

Phosphating, electrostatic

Wheeling Machine

Metal Finishing 433

Phosphate coating

ARCELOR

Metal Finishing 433

Electroplating

**B. LOCAL LIMITS**

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ

OR EPA?

YES - New local limits have yet to be approved.

2. Describe any apparent problems with the local limits. No problems were noted.
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:	Permit:	Requirement in Program:	Comments:
<b>Metals:</b>				
influent	<u>1/month</u>	<u>1/qtr</u>	<u>1/qtr</u>	<u>                    </u>
effluent	<u>1/month</u>	<u>1/qtr</u>	<u>1/qtr</u>	<u>                    </u>
sludge	<u>1/qtr</u>	<u>none</u>	<u>none</u>	<u>                    </u>
<b>Organics:</b>				
influent	<u>1/yr</u>	<u>1/yr</u>	<u>1/yr</u>	<u>                    </u>
effluent	<u>1/yr</u>	<u>1/yr</u>	<u>1/yr</u>	<u>                    </u>
sludge	<u>1/yr</u>	<u>none</u>	<u>none</u>	<u>                    </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? YES

2. How many IU permits (or other control documents) have been issued? 14

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 n/a

IU reporting requirements n/a

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>&gt; 1/month</u>	<u>1/month</u>
other SIUs	<u>&gt; 1/month</u>	<u>1/month</u>
Inspection:		
categorical IUs	<u>1/yr</u>	<u>1/yr</u>
other SIUs	<u>1/yr</u>	<u>1/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? Mostly unannounced. (1 day notice if contacted)

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 n/a

Observation of IU self-monitoring procedures n/a

Verification that approved analytical techniques are used n/a

Verification of IU flow measurement (where required) yes

6. Overall adequacy of inspection documentation: Satisfactory.

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? \_\_\_\_\_

Data Manager computer system is used to track all information.

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

Self monitoring is not required.

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? A notice of Non-Compliance is given to the facility. In 30 days a response and corrective action plan should be submitted. If violations continue, a NOV is issued with a 10 day response time. An enforcement meeting then ensues.

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: NA

**E. ENFORCEMENT**

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? \_\_\_\_\_

YES – A new ERP has been submitted to ADEQ for review.

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

Effluent limitations Notice of Non-Compliance (NONC) is issued.

Late reports Notification by telephone, a letter/NONC sent, enforcement meeting.

Unpermitted discharges Notice of Non-Compliance (NONC) is issued . Notice of Violation (NOV) is then issued, followed by an enforcement meeting.

Slug loads or spills NOV issued, followed by an enforcement meeting, Enforcement/ Fines.

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:
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NONE

5 Comments on the POTW's enforcement procedures: Enforcement Procedures appear to be adequate at this time.

**F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE**

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

YES

2. Are staffing levels adequate? Yes

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: \_\_\_\_\_

NONE

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 user cities? NO

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 multi-jurisdictional issues: No comments.

## **H. EVALUATION AND COMMENTS**

**The Pretreatment Staff is knowledgeable of the requirements of their Pretreatment Program and that is reflected in the good job that they do implementing the Program. At the time of this inspection, no inadequacies were noted. In the previous twelve months the facility reported no Significant Violators. Files reviewed during the inspection were Aramark Services, Union Pacific Railroad, and Planters Cotton Seed Oil Mill.**

### **IU Site Visits**

*Union Pacific Railroad  
Planters Cotton Seed Oil Mill  
Aramark Services*

**PRETREATMENT COMPLIANCE INSPECTION**

**IU SITE VISIT FORM**

Name of Industry: Aramark Services

POTW Name: Pine Bluff Boyd Point POTW

Industry Contacts: Mark Peden, General Manager

Date and Time of Visit: March 16, 2011 @ 1:30 p.m.

Description of Manufacturing Process: The facility provides an industrial laundry service specializing in the rental of reusable textiles. The cleaning of industrial textiles requires water washing utilizing surfactants, silicates and alkali detergents to remove organic and inorganic soils. Oxalic acid is used to whiten garments.

Sources of Process Wastewater: Industrial laundry service

Categorical Industry? no

Basis for Limits: N/A

Point of Application: n/a

Description of Pretreatment Equipment and Procedures: The cleaning of industrial textiles requires water washing utilizing surfactants, silicates and alkali detergents to remove organic and inorganic soils. Oxalic acid is used to whiten garments.

Spill Prevention and Solvent Management Procedures: adequate

Sampling Location and Equipment: adequate

**PRETREATMENT COMPLIANCE INSPECTION  
IU SITE VISIT FORM**

**Name of Industry:** Union Pacific Railroad

**POTW Name:** Pine Bluff - Boyd Point

**Industry Contacts:** John Stewart – Environmental Manager

**Date and Time of Visit:** March 16, 2011 @ 10:00 a.m.

**Description of Manufacturing Process:** Locomotive and railcar maintenance

**Sources of Process Wastewater:** storm water runoff

**Categorical Industry?** No

**Basis for Limits:** n/a

**Point of Application:** n/a

**Description of Pretreatment Equipment and Procedures:** sedimentation ponds

**Spill Prevention and Solvent Management Procedures:** Adequate

**Sampling Location and Equipment:** Adequate

**PRETREATMENT COMPLIANCE INSPECTION**

**IU SITE VISIT FORM**

**Name of Industry:** Planters Cotton Seed Oil Mill

**POTW Name:** Pine Bluff - Boyd Point

**Industry Contacts:** Brian Flenon – Environmental Manager

**Date and Time of Visit:** March 16, 2011 @ 11:00 a.m.

**Description of Manufacturing Process:** process cotton seeds into vegetable oil, cotton meal, hulls, and lint

**Sources of Process Wastewater:** cotton seed processing

**Categorical Industry?** No

**Basis for Limits:** n/a

**Point of Application:** n/a

**Description of Pretreatment Equipment and Procedures:** Hexane removal

**Spill Prevention and Solvent Management Procedures:** Adequate

**Sampling Location and Equipment:** Adequate

**PRETREATMENT COMPLIANCE INSPECTION (PCI)**

	<b>CODE</b>
<b>INSPECTOR'S NAME</b> <u>Steven L. Henderson</u>	
<b>NAME OF FACILITY</b> <u>City of Pine Bluff Wastewater Utility</u>	
<b>PERMIT NUMBER USED TO TRACK PROGRAM</b> <u>AR0033316</u>	<b>NPID</b>
<b>DATE OF PCI</b> <u>March 16, 2011</u>	<b>DTIA</b>

**PPETS WENDB DATA ELEMENTS**

<b>NUMBER OF SIGNIFICANT IUS (SIUS)</b>	<u>10</u>	<b>SIUS</b>
<b>NUMBER OF CATEGORICAL IUS</b>	<u>4</u>	<b>CIUS</b>
<b>SIUS NOT SAMPLED OR INSPECTED BY POTW</b>	<u>0</u>	<b>NOIN</b>
<b>SIUS WITHOUT CONTROL MECHANISM</b>	<u>0</u>	<b>NOCM</b>
<b>SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING</b>	<u>0</u>	<b>PSNC</b>
<b>SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS</b>	<u>0</u>	<b>MSNC</b>
<b>SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW</b>	<u>0</u>	<b>SNIN</b>