ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Van Buren POTW

AFIN Number: **17-00062**

NPDES Permit Number(s): AR0040967, AR0021482, and AR0037567

Program Tracked under NPDES Permit Number: AR0021482

Fact Sheet Preparation Date: November 2003

Date of Last PCI/Audit: PCI-April 16,2008 Audit-June 15-18,2009

Date of Last Annual Report: October 27, 2010

Name of Inspector: Jeff Tyler

Date PCI Performed: May 24-25,2011

Name, Title, and Telephone Number of Facility Representative: Kim Redo / Environmental Coordinator / 479-474-0941

Name and Title of Other Participants: Jeff Testerman/ Operator

Number of IUs Visited: 2

Name(s) of IUs Visited: **B & W Plating and Simmons Poultry Farms**

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

- List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. Added-B & W Plating (November 2009)
- 2. Has ADEQ or EPA been notified of these changes? Yes-2010 AR
- 3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes
- 4. What procedures are being used to update the IU Survey? Industrial user survey form is sent every three years to industries and businesses, phone call to facilities, and monitoring water records at the City.
- 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) 9
- 6. Number of Categorical Industrial Users: 4
- How does the POTW determine the appropriate categorical standards to apply to an IU? Federal register regulations 40CFR, Part 433 and SIC Code book.
- 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: River City Coating	Category: Metal Finishing	Regulated Process: Phosphating and
	notar rinibiling	Electrostatic painting
Arkansas Lamp Mfg.	Metal Finishing	Phosphating and
		Electrostatic painting
Fab Tech	Metal Finishing	Phosphating & painting
B & W Plating	Metal Finishing	Phosphating & Electroplating

B. LOCAL LIMITS

1.	IS THE PO BY ADEQ (LOCAL LIMITS WH	ICH HAVE BEEN	I APPROVED
2.	Describe None	any apparent	problems with	the local lim	nits.
3.	sludge p	erformed by th	nt scans of POT ne POTW? Does oproved program	this fulfill	the
			art III of the	NPDES permit?	
Pol	lutant:	Frequency:	Requirem Permit:		Comments:
	als: fluent:	4/yr	4/yr	4/yr	Table III
Ef	fluent:	4/yr	4/yr	4/yr.	Table III
	Sludge:	1/when removed	1/qtr	1/qtr	Table III
-	anics: fluent:	1/yr	1/yr	1/yr	Table II
Ef	fluent:	1/yr	1/yr	1/yr.	Table II
	Sludge:	1/when removed	1/yr	1/yr	Table II

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
- How many IU permits (or other control documents) have been issued?
- 3. DO ALL <u>SIGNIFICANT</u> <u>IUS</u> 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
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: $\overline{\mathbf{Y}}$	es	
Monitoring frequend	cy: Yes	
Bypass prohibition:	Yes	
Right of entry: Ye	S	
Nontransferability:	Yes	
Revocation clause:	Yes	
Penalty Provisions:	Yes	
Slug load notificat	ion: Yes	
Notification of pro	cess change:	Yes

D. MONITORING OF IUS BY POTW

1.	Indicate current ins requirement below:	pection and sampling fr	equency and program
	-	Current frequency:	Program Requirement:
	Sampling: categorical IUs	2/yr	2/yr
	other SIUs	2/yr	2/yr
	Inspection: categorical IUs	1/yr	2/yr
	other SIUs	1/yr	2/yr
2.	HAS EACH SIU BEEN IN REQUIRED BY THE APPR	SPECTED AND SAMPLED AT COVED PROGRAM? Yes	THE FREQUENCY
3.	Are inspections anno	ounced or unannounced?	Announced
4.	Are records kept of	each inspection? Y	es
5.	Does the inspection the following:	report contain an adequ	ate description of
	Date and time of ins	pection: Yes	
	Officials present:	Yes	
	Inspection of chemic	al storage areas: Yes	
		ated processes, categor f these waste streams:	ical waste streams, and Yes
	Inspection of the pr	etreatment facilities:	Yes
	Review of self-monit	oring records: Yes	
	Observation of IU se	lf-monitoring procedure	s: Yes
	Verification that ap	proved analytical techn	iques are used: Yes
	Verification of IU f	low measurement (where	required): Yes
6.	Overall adequacy of	inspection documentatio	n: 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? Tracked and reviewed by the Environmental Coordinator with the aid of an inspection form.
- 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

- 17. What are the POTW's procedures for following up violations? The permittee has an approved enforcement response plan with provisions for both formal and informal action depending on the type of violation.
- 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
Additional comments on the POTW's inspection and sampling procedures: In regards to sampling, two facilities (AR.
Lamp & B & W Plating) appear to have batch discharges.
Efforts should be made to sample these facilities during times of discharge.

19.

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: NOV and Administrative penalty

Late reports: Phone call, repeat violations with NOV

Unpermitted discharges: Show cause hearing, NOV and possible administrative penalty Slug loads or spills: Show cause hearing, NOV, and possible administrative penalty.

- 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, as needed. No significant violators listed in last Annual Report-(October 2010).
- 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:
None	N/A	N/A	N/A
		<u> </u>	

5.	Comments	on	the	POTW	's ei	nforcemen	nt j	procedu	ires:		
	According	g to	201	.0 an	nual	report,	14	NOV's	issued	and	total
	penalties	s as	sess	sed w	as \$	8,339.					

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. MULTIJURISDICTIONAL ISSUES

- 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? 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: <u>N/A</u>

H. EVALUATION AND COMMENTS

The pretreatment program appears to be in compliance at time of the inspection. Recommendation includes requiring facilities to submit a discharge monitoring report even in months when a discharge does not occur. PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **B & W Plating**

POTW Name: City of Van Buren (AR0021482)

Industry Contacts: Elbert Basham-Management / Casey Crase-Lab

Date and Time of Visit: May 25, 2011 / 1300-1350

Description of Manufacturing Process:

Nickel, Tin, and Lead Electroplating, minimal amounts of steel and Copper.

Sources of Process Wastewater: Rinse water from tanks and basins

Categorical Industry? Yes

Basis for Limits: 40 CFR Part 433

Point of Application: N/A

Description of Pretreatment Equipment and Procedures: EQ tank, pH adjusted to 9-9.5, then to reaction tank (add metal precip & coagulant), then to flock mixing tank to clarifier to final pH tank or sludge holding tank, then to filter press. Waste water can also be sent to the facilities evaporator.

Spill Prevention and Solvent Management Procedures: Emergency plan in regard to spills/leaks located at the facility. Spills from process area drains to contained sump pit. Then pumped to the EQ tank for processing. Pre-treatment equipment contained within concrete berm.

Sampling Location and Equipment: Sampling box on north side of building. PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Simmons Poultry Farms

POTW Name: City of Van Buren (AR0021482)

Industry Contacts: Brian Clifton, Waste Water Lead Operator

Date and Time of Visit: May 25, 2011 / 1400-1500

Description of Manufacturing Process: Poultry processing

Sources of Process Wastewater: Process/production line

Categorical Industry? No

Basis for Limits: Modified TBLLs

Point of Application: N/A

Description of Pretreatment Equipment and Procedures: Facilities primary rotary screen, addition of polymer then to first DAF unit, then to aerated EQ basin then to second EQ basin, polymer added and anti-foam chemical added, then to sewer

Spill Prevention and Solvent Management Procedures: SPCCC is located on site.

Sampling Location and Equipment: ISCO automatic sampler is located in building, tube extends through building to the parshall flume

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

CODE

INSPECTOR'S NAME:	Jeff Tyler	
NAME OF FACILITY:	City of Van Buren	
PERMIT NUMBER USED TO TRACK PROGRAM:	AR0021482	NPID
DATE OF PCI:	May 24-25, 2011	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	9	SIUS
NUMBER OF CATEGORICAL IUS:	4	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	0	NOIN
SIUS WITHOUT CONTROL MECHANISM:	0	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	0	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	0	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	0	SNIN