

ADEQ

ARKANSAS
Department of Environmental Quality

January 7, 2011

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 December 29, 2010, 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



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 1 0 1 2 2 9 17 18 P 19 S 20 1					
Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 0 0 1 69	70 N	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) RUSSELLVILLE WWTP (CITY CORPORATION) 404 Jimmy Lile Road Russellville, AR 72802	Entry Time/Date 0900 / 12-29-2010	Permit Effective Date 10/01/2010
	Exit Time/Date 1700 / 12-29-2010	Permit Expiration Date 09/30/2015
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Randy Bradley/ Pretreatment Coordinator / Phone: (479) 968-2080 ext. 133 Fax: (479) 968-3265 Charlotte Petrick / IU inspector	Other Facility Data 35° 14' 57" N, 93° 06' 58" W	
Name, Address of Responsible Official/Title/Phone and Fax Number Craig Noble, (479) 968-2080 ext. 113 RUSSELLVILLE CITY CORPORATION P.O. Box 3186 Russellville, AR 72811	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
PDS #067508		

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:

1. Premium Protein Products
2. P.O.M.

Name(s) and Signature(s) of Inspector(s) Amy Beck	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date December 29, 2010
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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

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: **NA**

Date of Last PCI/Audit: **April, 2009 - PCI**

Date of Last Annual Report: **February 2010**

Name of Inspector: **Amy Beck**

Date PCI Performed: **December 29, 2010**

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

Name and Title of Other Participants: _____
Charlotte Petrick, IU Inspector, City Corp.

Number of IUs Visited: **2**

Name(s) of IUs Visited: **Premium Protein Products, P.O.M.**

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

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. No change

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 non-residential applications for water hook up to identify new industrial and commercial users, site visit if necessary, review monthly water use report to identify possible IUs.

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:
P.O.M.	Metal finishing	Phosphatizing rinse
Taber Metals	Aluminum forming	Contact cooling
Grace Manufacturing	Metal finishing	Phosphatizing rinse

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? The facility has drafted the local limits and is awaiting approval of ordinance by city counsel (expect vote in 2011 first quarter). Then approval from ADEQ.

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

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.

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?
(Taber Extrusion and MAHLE 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: Documentation has improved since last inspection, appears to be very thorough.

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.
-
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Certified contract lab used (EEG).
9. Are sampling and flow monitoring equipment properly maintained? Yes, sampling bottle cleaned after each use, sample tube for each IU, pH meter calibrated each use.
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? Pretreatment coordinator keeps track with the use of an ops system for tracking and an Excel spreadsheet.
-
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.
-

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.

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 effective.

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

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? NA

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

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Premium Protein Products

POTW Name: Russellville City Corp WWTP

Industry Contacts: Gary Reddell - Acting Plant Manager

Date and Time of Visit: December 29, 2010; 1130

Description of Manufacturing Process:
Facility recycles protein for animal feed (rendering plant).

Sources of Process Wastewater:
Rinse water from raw product area, process area, truck wash area.

Categorical Industry? No

Basis for Limits: BOD, NH3-N, TSS limits based on local limits (daily avg flow > 25,000 gal, and IU NH3-N contribution to STP.
Point of Application: NA

Description of Pretreatment Equipment and Procedures:
All flows directed to a skimmer, then anaerobic pond, and 3 aerobic ponds in series. Flow from last pond sent to WWTP.

Spill Prevention and Solvent Management Procedures:
This area could use improvement. Chemical storage area is not contained. Process water flows to low areas then pump must be manually turned on to get to skimmer.

Sampling Location and Equipment:
City and/or contract lab sample this facility.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: P.O.M.

POTW Name: Russellville City Corp WWTP

Industry Contacts: Brent Huneycutt-Environment & Safety Manager

Date and Time of Visit: December 29, 2010; 1230

Description of Manufacturing Process:
This facility manufactures parking meters and various contracted parts.

Sources of Process Wastewater:
Metal finishing line and powder paint line.

Categorical Industry? Yes

Basis for Limits: Metal finishing 40 CFR 433.15

Point of Application: NA

Description of Pretreatment Equipment and Procedures:
The facility has a series of settling tanks, flocculent and ph adjustments added prior to discharging to the WWTP.

Spill Prevention and Solvent Management Procedures:
All plant floor drains have been removed.

Sampling Location and Equipment:
City and/or contract lab sample this facility.

