

# ADEQ

ARKANSAS  
Department of Environmental Quality

October 17, 2012

Mr. Tommy Shackelford, Chief Operating Officer  
Conway Corporation  
P.O. Box 99  
Conway, AR 72033

RE: Inspection of the Pretreatment Program  
NPDES Permit No.: AR0051951, AFIN: 23-01095

Dear Mr. Shackelford:

On October 12, 2012, 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



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 5 1 9 5 1	11 12 1 2 1 0 1 2	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>CITY OF CONWAY – Tupelo Bayou WWTP</b> 900 Stanley Russ Road Conway, AR 72033	Entry Time/Date 0935 / 10-12-2012	Permit Effective Date 11/1/2009
	Exit Time/Date 1215/ 10-12-2012	Permit Expiration Date 10/31/2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Trey Lieblong/Environmental Coordinator/Phone: 501-450-6080, Fax: 501-450-6061;	Other Facility Data 35° 3' 5.35" N, 92° 32' 11.05" W	
Name, Address of Responsible Official/Title/Phone and Fax Number Tommy Shackelford, 501-450-6080 CITY OF CONWAY – Tupelo Bayou WWTP P.O. Box 99 Conway, AR 72033	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
PDS #068300		

## 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.**

**Industrial Users visited:**

1. Tokusen
2. Linen King

Name(s) and Signature(s) of Inspector(s) Amy Beck	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality-Russellville Ph. :(479)968-7339 ext.16, Fax: (479)968-7321	Date October 16, 2012
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: Conway Corporation

AFIN Number: 23-01095

NPDES Permit Number(s): AR0051951, AR0033359, ARR000125

Program Tracked under NPDES Permit Number: AR0051951 (formerly  
under AR0033359)

Fact Sheet Preparation Date: \_\_\_\_\_

Date of Last PCI/Audit: June, 2012

Date of Last Annual Report: March 29, 2012

Name of Inspector: Amy Beck

Date PCI Performed: October 12, 2012

Name, Title, and Telephone Number of Facility Representative:  
Trey Lieblong, Environmental Coordinator, 501-450-6080

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Name and Title of Other Participants: NA

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Number of IUs Visited: 2

Name(s) of IUs Visited: Tokusen, Linen King

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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. NA

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2. Has ADEQ or EPA been notified of these changes? NA

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3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes

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4. What procedures are being used to update the IU Survey?  
All new industrial permits processed through Conway Corp's Environmental Coordinator. Spot checks on business' listed on Hazardous Waste Generator and Conway Business lists

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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) 18

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6. Number of Categorical Industrial Users: 6

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7. How does the POTW determine the appropriate categorical standards to apply to an IU? Based on 403 regulations, EPA guidelines.

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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>Southern E-Coat</b>	<b>Metal finishing</b>	<b>Phosphatizing rinse</b>
<b>IC Corp</b>	<b>Metal finishing</b>	<b>Phosphatizing rinse</b>
<b>SFI of Arkansas</b>	<b>Metal finishing</b>	<b>Phosphatizing rinse</b>
<b>Tokusen</b>	<b>Metal finishing</b>	<b>Brass Plating</b>
<b>Valley Plating</b>	<b>Metal finishing</b>	<b>Chrome Plating</b>
<b>Virco 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. Approval has been delayed by construction of Tupelo Bayou WWTP.

2. Describe any apparent problems with the local limits. Local limits may need to be modified depending on final permit limits for Tupelo Bayou WWTP.

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>Monthly</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Effluent:	<u>Monthly</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Organics:				
Influent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/quarter</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? 18

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?  
 (Tokusen and Linen King 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: NA - POTW monitors all IU

IU reporting requirements: NA

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>Monthly (metals)</u>	<u>Monthly</u>
other SIUs	<u>Quarterly (organics)</u>	<u>Quarterly</u>
Inspection:		
categorical IUs	<u>Annually</u>	<u>Annually</u>
other SIUs	<u>Annually</u>	<u>Annually</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: NA

Observation of IU self-monitoring procedures: NA

Verification that approved analytical techniques are used: NA

Verification of IU flow measurement (where required): NA

6. Overall adequacy of inspection documentation: Adequate

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)? 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 BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? "Linko Data Systems" tracking software, reminder letter sent to IU prior to renewal, hard copies on file.
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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? NA. No self monitoring required, Conway Corp. performs all required sampling.
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16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes. Retest and if necessary send notice of violation and request compliance plan.
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17. What are the POTW's procedures for following up violations?  
Resample, and then send notice of violation. IU responds  
explaining reason for violation.

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18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR  
 403.12 (b)? Yes

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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: No

Description of operations: Yes

Process flow diagrams: Yes

Flow measurements: Yes - water consumption

Measurements of regulated pollutants: Yes

Certification of compliance by the IU: Yes

Compliance schedule (if needed): NA

19. Additional comments on the POTW's inspection and sampling  
 procedures: POTW is meeting all inspection and sampling  
requirements. They seem to have a good working relationship  
with the IU visited.

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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: retest, NOV

Late reports: NA - reporting not required

Unpermitted discharges: NOV, permitting or disconnect water

Slug loads or spills: report, NOV

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:
<u>none in last</u>	<u>12 months</u>		

5. Comments on the POTW's enforcement procedures:  
Violations have again been reduced since the last pretreatment inspection, suggesting 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: Conway Corp. does not service facilities outside the city limits.  
\_\_\_\_\_  
\_\_\_\_\_

H. EVALUATION AND COMMENTS

**Pretreatment records are well organized.**

**The program is satisfactory in the reviewed areas.**

**There were no significant violators for 2011. This is a good indication of the progress the program has made. The POTW seems to have a good working relationship with the industries visited.**

Multiple horizontal lines for additional text entry.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry:  Tokusen

POTW Name:  Tupelo Bayou WWTP

Industry Contacts:  David Yarberry

Date and Time of Visit:  October 12, 2012 ; 1115

Description of Manufacturing Process:  
 This facility manufactures brass plated wire for tires.

Sources of Process Wastewater:  
 Pickling department, Copper/Zinc plating process, cooling tower blow down.

Categorical Industry?  Yes

Basis for Limits:  Categorical

Point of Application:  NA

Description of Pretreatment Equipment and Procedures:  
 Flocculation/Precipitation, series of clarifiers and pH adjustment.

Spill Prevention and Solvent Management Procedures:  
 SPCC updated in 2011

Sampling Location and Equipment:  
 ISCO sampler located at end of treatment process.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry:   **Linen King**  

POTW Name:   **Tupelo Bayou WWTP**  

Industry Contacts:   **Richard Warren, Earnest Ledbetter**  

Date and Time of Visit:   **October 12, 2012 ; 1200**  

Description of Manufacturing Process:  
  **This facility is a laundry service for regional hospitals.**  

Sources of Process Wastewater:  
  **washing machines**  

Categorical Industry?   **No**  

Basis for Limits:   **Local**  

Point of Application: \_\_\_\_\_

Description of Pretreatment Equipment and Procedures:  
  **Settling pit prior to discharge to WWTP.**  

Spill Prevention and Solvent Management Procedures:  
  **Spill kit maintained on site**  

Sampling Location and Equipment:  
  **Portable ISCO sampler set up in settling pit.**

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>                    <b>Amy Beck</b>                    </u>	
NAME OF FACILITY:	<u>                    <b>Tupelo Bayou WWTP</b>                    </u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>                    <b>AR0051951</b>                    </u>	NPID
DATE OF PCI:	<u>                    <b>October 12, 2012</b>                    </u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>                    <b>18</b>                    </u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>                    <b>6</b>                    </u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>                    <b>0</b>                    </u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>                    <b>0</b>                    </u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>                    <b>0</b>                    </u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>                    <b>0</b>                    </u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>                    <b>0</b>                    </u>	SNIN