

ADEQ

ARKANSAS
Department of Environmental Quality

June 24, 2011

Gary Smith, Director of Utilities
City of Van Buren
P.O. Drawer 1269
Van Buren, AR 72956

Re: Pretreatment Permit Compliance Inspection (Crawford Co)
AFIN: No. 17-00062 NPDES Permit No. AR0021482 & AR0040967

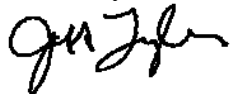
Dear Mr. Smith:

On May 24th and 25th, 2011, I performed a pretreatment permit 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 the City of Van Buren appears to be in compliance with terms of the permit. After conducting the assessment, the following recommendations are being made.

1. When conducting preliminary inspections during the city's Industrial User survey process, complete and maintain the IU inspection reports for the pre-treatment files on facilities which are inspected.
2. In months where an IU does not have a discharge to the POTW, still require them to submit a discharge monitoring report and indicate "No Discharge" on the report.

If you have any questions concerning this inspection, please contact me at 479-424-0325

Sincerely,



Jeff Tyler
District 4 Field Inspector
ADEQ-Water Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

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	4	8	2	11	12	1	3	0	6	1	2	17	18	P	19	S	20	1
Remarks																												
A F I N 1 7 - 0 0 0 6 2																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved												
67	0	0	2	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) City Of Van Buren POTW (South Plant) 1401 Port Road Van Buren, AR 72956	Entry Time /Date 0915 / June 11, 2013 0900 / June 12, 2013	Permit Effective Date March 1, 2009
	Exit Time/Date 1520 / June 11, 2013 1200 / June 12, 2013	Permit Expiration Date February, 28, 2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Kim Redo / Environmental Coordinator / 479-474-0941 / cell / 479-670-3190 James Dunn / Chief Operator / 479-651-4449	Other Facility Data N/A	
Name, Address of Responsible Official/Title/Phone and Fax Number Steve Dufresne / Utilities Director / 479-474-5067 / cell / 479-459-2234 P. O. Drawer 1269 Van Buren, AR 72956	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)

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: Effluent Limits

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

The Pre-Treatment program was rated as satisfactory. The following items were noted:

- Oxane Materials was added as a Significant Industrial User in January 2013, by the City of Van Buren. ADEQ or the EPA has not been notified of this addition. Coordinator plans to submit the facility as a new SIU in the 2013 Annual Report.
- When permit renewals for American Lamp and Fab Tech were completed, Oil & Grease was left off the permit as a required parameter to sample for. Coordinator revised both permits and no further action is needed.

Name(s) and Signature(s) of Inspector(s) Jeff Tyler	Agency/Office/Telephone/Fax ADEQ / Fort Smith /479-424-0325 / 479-424-0330	Date June 14, 2013
Signature of Reviewer Kerri McCabe	Agency/Office/Phone and Fax Numbers ADEQ / NLR / 501-682-0642	Date June 24, 2013

**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 25, 2011 Audit-June 19-21, 2011

Date of Last Annual Report: October 29, 2012

Name of Inspector: Jeff Tyler

Date PCI Performed: June 11-12, 2013

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

Name and Title of Other Participants: Danny Gattis/ Operator
James Dunn / Chief Operator

Number of IUs Visited: 2

Name(s) of IUs Visited: Tate & Lyle and Oxane Materials

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. Added-Oxane Materials (January 2013)

2. Has ADEQ or EPA been notified of these changes? No

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 calls 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) 10

6. Number of Categorical Industrial Users: 4

7. 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:	Category:	Regulated Process:
River City Coating	Metal Finishing	Phosphating and 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 POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes

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>4/yr</u>	<u>4/yr</u>	<u>4/yr</u>	<u>Table III</u>
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>4/yr.</u>	<u>Table III</u>
Sludge:	<u>1/when removed</u>	<u>1/qtr</u>	<u>1/qtr</u>	<u>Table III</u>
Organics:				
Influent:	<u>1/yr</u>	<u>1/yr</u>	<u>1/yr</u>	<u>Table II</u>
Effluent:	<u>1/yr</u>	<u>1/yr</u>	<u>1/yr.</u>	<u>Table II</u>
Sludge:	<u>1/when removed</u>	<u>1/yr</u>	<u>1/yr</u>	<u>Table II</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? 10

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: 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/yr</u>	<u>2/yr</u>
other SIUs	<u>2/yr</u>	<u>2/yr</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? Announced

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

Verification that approved analytical techniques are used: Yes

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? 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

19. 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.

5. Comments on the POTW's enforcement procedures:
According to 2012 annual report, 5 NOV's issued and total penalties assessed were \$6,856.
-
-
-
-

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
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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? 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: N/A
-
-
-

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Oxane Materials

POTW Name: City of Van Buren (AR0021482)

Industry Contacts: Duane Andrews-Equipment Engineering Manager

Date and Time of Visit: June 12, 2013 / 0930-1020

Description of Manufacturing Process:
Raw materials>mixing>coating/screening>Sintering>final inspection>loading.

Sources of Process Wastewater:
Rinse water from tanks and basins

Categorical Industry? No

Basis for Limits: Modified TBLs

Point of Application: N/A

Description of Pretreatment Equipment and Procedures:
Coagulant added then a polymer, flows through flogging tubes, then to 2500 gallon settling tanks, then two additional 250 settling tanks, pumped to city sewer

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 pre-treatment system.

Sampling Location and Equipment:
Sampling is conducted at the manhole located on the south side of the building.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Tate & Lyle

POTW Name: City of Van Buren (AR0021482)

Industry Contacts: Randy Cook, Plant Mgr.& T.Vaughn, Plant Cord.

Date and Time of Visit: June 12, 2013 / 1035-1115

Description of Manufacturing Process:
Modified food starch processor-slurry>drying process>packaging.

Sources of Process Wastewater:
Waste water from production line with wash-down water, limited blow down and cooling tower water.

Categorical Industry? No

Basis for Limits: Modified TBLs

Point of Application: N/A

Description of Pretreatment Equipment and Procedures:
Facilities surge tank (pH monitored)> 3 holding tanks > waste water aeration basin > clarifier > sludge goes to digester then to sludge press / waste water to public sewer.

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

Sampling Location and Equipment:
Automatic sampler is located in building at gate entrance.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

INSPECTOR'S NAME: Jeff Tyler

NAME OF FACILITY: City of Van Buren

PERMIT NUMBER USED
TO TRACK PROGRAM: AR0021482 NPID

DATE OF PCI: June 11-12, 2013 DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS): 10 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: 1 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