

ADEQ

ARKANSAS
Department of Environmental Quality

June 27, 2014

Mark Smith, General Manager
El Dorado Water Utilities
P.O. Box 1587
El Dorado, AR 71731

RE: El Dorado Water Utilities Inspection (Union Co)
AFIN: 70-00341 NPDES Permit No.: AR0033723

Dear Mr. Smith:

On June 12, 2014, I performed a Pretreatment Compliance Inspection of the above referenced 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. A copy of the inspection report is enclosed for your records.



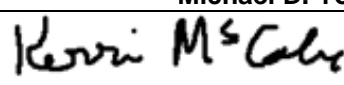
No violations were noted at the time of the inspection. Please refer to the attached inspection report for any comments.

If I can be of any assistance, please contact me at youngm@adeq.state.ar.us or (501) 837-2073.

Sincerely,



Michael D. Young
District 8 Field Inspector
Water Division

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 70-00341		PERMIT #: AR0033723		DATE: 6/12/2014
		COUNTY: 70 Union		PDS #: 078536		MEDIA: WN
		GPS LAT: 33.217387 LONG: -92.663939 LOCATION: Entrance				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: El Dorado Water Utilities LOCATION: P.O. Box 1587 CITY: El Dorado, AR 71730			FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 101531 S - State FACILITY EVALUATION RATING: 5 - Satisfactory INSPECTION TYPE: Pretreatment Compliance			
RESPONSIBLE OFFICIAL			DATE(S): 6/12/2014 ENTRY TIME: 09:50 EXIT TIME: 15:01 PERMIT EFFECTIVE DATE: 8/31/2008 PERMIT EXPIRATION DATE: 9/30/2013			
NAME / TITLE: Mark Smith / General Manager COMPANY: El Dorado Water Utilities MAILING ADDRESS: P.O. Box 1587 CITY, STATE, ZIP: El Dorado AR 71731 PHONE & EXT. / FAX: 870-862-6451 / EMAIL:			FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: No			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Harold Baker/Treatment Superintendent/870-862-6451 Jay Culpepper/Pretreatment/870-862-6451 Kerri McCabe/ADEQ Water Inspector Supervisor Brent Walker/ADEQ District 3 Water Inspector			
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
S	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER	
S	RECORDS/REPORTS	S	LABORATORY	S	FACILITY SITE REVIEW	
N	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM	
S	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT	
**	OTHER:					
SUMMARY OF FINDINGS						
NO VIOLATIONS NOTED AT TIME OF INSPECTION.						
GENERAL COMMENTS						
<ul style="list-style-type: none"> • Facility is operating off of an expired permit but has a draft awaiting approval. • Kehl Solutions is a categorical no-discharge pretreatment facility that needs to be permitted by El Dorado Water Utility. • It is advised that local limits are reviewed and revised following the closure of Pilgrim's Pride, a significant user that contributed to the dilution of other IUs. 						
INSPECTOR'S SIGNATURE:  Michael D. Young				DATE: 06/25/2014		
SUPERVISOR'S SIGNATURE:  Kerri McCabe				DATE: 6/26/2014		

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

Name of Municipality: El Dorado Water - South Plant

AFIN Number: 70-00341

NPDES Permit Number(s): AR0033723, AR0033936, AR0049443,
AR0050296 (Pipeline)

Program Tracked under NPDES Permit Number: AR0033723

Fact Sheet Preparation Date: Unknown

Date of Last PCI/Audit: August 28-30, 2012 (Audit)

Date of Last Annual Report: March 26, 2014

Name of Inspector: Michael D. Young

Date PCI Performed: June 12, 2014

Name, Title, and Telephone Number of Facility Representative:
Harold Baker, Treatment Superintendent, 870-862-6451

Name and Title of Other Participants: Kerri McCabe, ADEQ Water
Division Inspector
Supervisor

Brent Walker, District 3 Water Division Inspector; Jay Culpepper,
EWU Pretreatment

Number of IUs Visited: 2

Name(s) of IUs Visited: Miller Transport; Kehl Solutions

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. None. 2015 EWU will not reissue permit to Pilgrim's Pride; facility has shut down.

2. Has ADEQ or EPA been notified of these changes? N/A

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

4. What procedures are being used to update the IU Survey? Distribute survey to IUs and determine if they are categorical users.

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) 5

6. Number of Categorical Industrial Users: 3

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Code of Federal Registry as per ADEQ.

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:
Percolite Reflector	Metal Finishing	Anodizing
Milbank	Metal Finishing	Phosphatizing
Miller Transport	Trans Equip Cleaning	Equip Cleaning

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.
Need to be reviewed in 2015 following the closure of Pilgrim's Pride.

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 Permit:	Requirement in Program:	Comments:
Metals:				
Influent:	<u>4/year</u>	<u>4/year</u>	<u>yearly</u>	
Effluent:	<u>4/year</u>	<u>4/year</u>	<u>yearly</u>	
Sludge:	<u>yearly</u>	<u>yearly</u>	<u>Yearly (low level quarterly)</u>	
Organics:				
Influent:	<u>yearly</u>	<u>yearly</u>	<u>yearly</u>	
Effluent:	<u>yearly</u>	<u>yearly</u>	<u>yearly</u>	
Sludge:	<u>N/A</u>	<u>N/A</u>	<u>N/A</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 reported.

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? 5 significant and 2 insignificant

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 (Miller Transport only)

IU reporting requirements: Yes (Miller Transport only)

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>Batch-twice/year</u>	<u>Twice per year</u>
other SIUs	<u>Once/week-twice/year</u>	<u>yearly</u>
Inspection:		
categorical IUs	<u>Yearly</u>	<u>Yearly</u>
other SIUs	<u>Yearly</u>	<u>Yearly</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: Yes, Miller Transport only

Observation of IU self-monitoring procedures: Yes, Miller Transport

Verification that approved analytical techniques are used: yes

Verification of IU flow measurement (where required): yes

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).

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? Mr. Peppers reviews all reports, Jay Culpepper reviews again. Reviewed again after bills are attached.

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?
Phone Call>Letter>CAO/NOV

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: EWU completes all sampling (except Miller
Transport for pH). This way they have control over samples
and analyses.

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? No recent violations.

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

Effluent limitations: Phone call, letter (NOV)

Late reports: Phone call, letter

Unpermitted discharges: Send out survey, investigate

Slug loads or spills: Spills contained at lift stations and pumped at cost to IU.

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)? No recent violations.

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			

5. Comments on the POTW's enforcement procedures:
Very good enforcement procedures. Due to batch processing,
loads are not accepted until after testing.
-
-
-
-

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? yes
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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:
n/a
-
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
-
-
-

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Michael D. Young</u>	
NAME OF FACILITY:	<u>El Dorado Water - South Plant</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0033723</u>	NPID
DATE OF PCI:	<u>June 12, 2014</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>5</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>3</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN