

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 73-00055		PERMIT #: AR0021601		DATE: 10/8/2014
		COUNTY: 73 White		PDS #: 081079		MEDIA: WN
		GPS LAT: 35.268289 LONG: -91.716111 LOCATION: Entrance				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: City of Searcy WWTF LOCATION: 260 N. Bypass CITY: Searcy			FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 80397 S - State FACILITY EVALUATION RATING: 4 - Satisfactory INSPECTION TYPE: Pretreatment Compliance			
RESPONSIBLE OFFICIAL			DATE(S): ENTRY TIME: EXIT TIME: PERMIT EFFECTIVE DATE: 10/8/2014 09:30 11:00 10/1/2013 10/9/2014 10:30 15:00 9/30/2018			
NAME / TITLE: Daniel Dawson / General Manager COMPANY: Searcy Water Utilities MAILING ADDRESS: 300 North Elm Street P.O. Box 1319 CITY, STATE, ZIP: Searcy AR 72145 PHONE & EXT: / FAX: 501-268-2481 / 501-268-9463 EMAIL: d.dawson@cablelynx.com			FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: Yes			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Clark Baker/ADEQ Water Inspector/501-682-0657 Erica McAdoo/ADEQ Water Inspector/501-682-0827			
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
S	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER	
S	RECORDS/REPORTS	S	LABORATORY	N	FACILITY SITE REVIEW	
S	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM	
S	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT	
N	OTHER:					
SUMMARY OF FINDINGS						
GENERAL COMMENTS						
Conducted inspections at the following Industrial Users: Eaton Hydraulics, Inc., Land O'Frost, and Schulze & Burch Biscuit Co.						
INSPECTOR'S SIGNATURE:  Clark Baker				DATE: 11/25/2014		
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh				DATE: 11/25/2014		

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

Name of Municipality: Searcy Water Utilities

AFIN Number: 73-00055

NPDES Permit Number(s): AR0021601

Program Tracked under NPDES Permit Number: AR0021601

Fact Sheet Preparation Date: NA

Date of Last PCI/Audit: August 20, 2013

Date of Last Annual Report: March 17, 2014

Name of Inspector: Rufus Torrence

Date PCI Performed: August 20, 21, 22

Name, Title, and Telephone Number of Facility Representative:
Jimmy Smith / Pretreatment Coordinator - Safety Director /
501-268-2481

Name and Title of Other Participants: Paul Abernathy / WWTP
Manager Wallace Whitlow / Laboratory Manager

Number of IUs Visited: Three

Name(s) of IUs Visited: Eaton Hydraulics, Inc. / Land O'Frost
Schulze & Burch Biscuit Co.

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

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?
Reading the paper, being aware of possible new industries from contractors that lay water lines and sewer lines, building engineers, chamber of commerce, and board members are aware of potential new customers.

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: 1

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Through the pretreatment Program and Code of Federal Regulations.

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:
<u>Eaton Hydraulics, Inc</u>	<u>Metal finishing</u>	<u>Nickel plating</u>
	<u>SIC 3494</u>	<u>Blackening lines</u>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? No

2. Describe any apparent problems with the local limits.
NA

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>Quarterly</u>	<u>Quarterly</u>	<u> </u>	<u> </u>
Effluent:	<u>Quarterly</u>	<u>Quarterly</u>	<u> </u>	<u> </u>
Sludge:	<u>Quarterly</u>	<u>-</u>	<u> </u>	<u> </u>
Organics:				
Influent:	<u>Quarterly</u>	<u>1/Year</u>	<u> </u>	<u> </u>
Effluent:	<u>3-5/Week</u>	<u>1/Year</u>	<u> </u>	<u> </u>
Sludge:	<u>Quarterly</u>	<u>-</u>	<u> </u>	<u> </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?
No

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? 11
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: ✓
- Type of sample: ✓
- Monitoring frequency: ✓
- Bypass prohibition: ✓
- Right of entry: ✓
- Nontransferability: ✓
- Revocation clause: ✓
- Penalty Provisions: ✓
- Slug load notification: ✓
- Notification of process change: ✓

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>Ongoing</u>	<u>2/industry/year</u>
other SIUs	<u>Ongoing</u>	<u>2/industry/year</u>
Inspection:		
categorical IUs	<u>1/year</u>	<u>1/year</u>
other SIUs	<u>1/year</u>	<u>1/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? 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: 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 (Quarterly west testing)**

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? **Copies are kept in IU files. Self-monitoring copies are used to determine surcharges monthly**

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 most common violations are pH, or not receiving monthly analyticals on time. pH violations are responded to by a NOV even though most of the time the problem has been fixed within an hour or two of the IU being notified of the pH result. Letters of accommodations come in after IU complies with the reports sent."

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: _____

Other environmental permits held: _____

Description of operations: _____

Process flow diagrams: _____

Flow measurements: _____

Measurements of regulated pollutants: _____

Certification of compliance by the IU: _____

Compliance schedule (if needed): _____

19. Additional comments on the POTW's inspection and sampling procedures: _____

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes. Covered in IU's permit and city ordinance 2011-9

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

Effluent limitations: Notice of Violation and Surcharges

Late reports: NOV issued, IU complies and sends a letter of intent with reports

Unpermitted discharges: None

Slug loads or spills: None

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)? NA

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</u>			

5. Comments on the POTW's enforcement procedures:

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: NA

H. EVALUATION AND COMMENTS

The Pretreatment Compliance Inspection included document reviews and three site visits of IUs: Eaton Hydraulics, Inc.

LandO'Frost, and Schulze & Burch Biscuit Co.

The program appears to be adequately accomplishing all of it's requirements.

On November 24, 2014 while conducting a collection system inspection it was discovered that a lift station receiving waste from Baker-Hughes contained 1½ feet of what appears to be used oil. It was also learned that the facility failed its biomonitoring for sub-lethal in minnows for the for quarter (conducted in September). It is not known if these two issues are related. This is the first time for Searcy to ever fail any form of biomonitoring.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Eaton Hydraulics, Inc.

POTW Name: City of Searcy - AR0021601

Industry Contacts: Kevin Caldwell (EHS Manager)

Date and Time of Visit: 10/9/2014 10:30-11:30

Description of Manufacturing Process:
Nickel plating, hot blacking, parts cleaning, cold blacking,
painting, machine cast iron, steel, aluminum

Sources of Process Wastewater:
Plating overflows, parts washers, batch processing of plating
rinse, spent machine coolant, and mop water.

Categorical Industry? Yes, metal finisher

Basis for Limits: City based

Point of Application: Treatment building

Description of Pretreatment Equipment and Procedures:
Filter press, filtration system, storage tanks, chemical process
To remove metals and adjust pH, another filtration system.

Spill Prevention and Solvent Management Procedures:
Secondary containment for chemicals and spill stations around
the facility for spills containing absorbent pads and socks.

Sampling Location and Equipment:
The treatment building is on the north side of the plant at the
final wastewater discharge.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Land O'Frost

POTW Name: City of Searcy

Industry Contacts: Teddy Townsend (Environmental, Health & Safety Manager)

Date and Time of Visit: 10/9/2014 12:30-13:30

Description of Manufacturing Process:
Meat Processing

Sources of Process Wastewater:
Meat butchering and cooking, equipment cleaning

Categorical Industry? No

Basis for Limits: City Based

Point of Application: Treatment system in the back of the building

Description of Pretreatment Equipment and Procedures:
The system works like an oil/water separator. Sanitation Dept. Comes each night and sucks off the top. Sulfuric acid is used to correct the pH.

Spill Prevention and Solvent Management Procedures:
Drains in floors drain to the treatment system

Sampling Location and Equipment:
At the treatment system's outfall

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Schulze & Burch Biscuit Co.

POTW Name: City of Searcy

Industry Contacts: Dharal Joshi

Date and Time of Visit: 10/9/2014 14:00-15:00

Description of Manufacturing Process:
Sanitation of food equipment

Sources of Process Wastewater:
Cleaning stations where equipment is power washed

Categorical Industry? No

Basis for Limits: City Based

Point of Application: None

Description of Pretreatment Equipment and Procedures:
The system works like an oil/water separator. Solids and grease
Are removed by a vacuum truck.

Spill Prevention and Solvent Management Procedures:
Drains in floors drain to the treatment system

Sampling Location and Equipment:
In a manhole outside the building between the pretreatment
system and the city's collection system

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Clark Baker</u>	
NAME OF FACILITY:	<u>Searcy Wastewater Treatment Facility</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021601</u>	NPID
DATE OF PCI:	<u>October 9, 2014</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>10</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>1</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>None</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>None</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>None</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>None</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>None</u>	SNIN

Google Earth image of the area with the WWTF and the IUs pinned:

