

September 28, 2015

Heath Ward, Executive Director Springdale Water Utilities P.O. Box 769 Springdale, AR -727650769

RE: Springdale Water Utilities Inspection

AFIN: 72-00003 Permit No.: AR0022063

Dear Mr. Ward:

On September 17-18, 2015, Alison West, District 1 Field Inspector, and I conducted 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 holden@adeq.state.ar.us or 479-267-0811, ext. 16.

Sincerely,

Matt Holden

District 1 Field Inspector

Water Division

VDEO		WATER	DIVISION IN	NSF	ECTIO	N REPORT	
ADLQ	AF	IN: 72-00003 PI	ERMIT #: AR0022 0	063		DATE: 9/17/2015	
ARKANSAS	CC	UNTY: 72 Wash i	ington	PDS:	#: 086775	MEDIA: WN	
Department of Environmental Quality	GP	S LAT: 36.21128	7 LONG: -94.1628	354 L	OCATION:	General Area	
FACILITY INFORMAT	TION				TION INFO	RMATION	
Springdale Water Utilities LOCATION:			FACILITY TYPE: 1 - Municipal		ror id#:)78 S - Stat e	e	
2910 Silent Grove Rd.			FACILITY EVALUATION RATING: INSPECTION TYPE: 3 - Satisfactory Pretreatment Compliance				
Springdale, AR 72762			1 /	RY TIME: 3:27	EXIT TIME: 15:50	PERMIT EFFECTIVE DATE:	
RESPONSIBLE OFFIC	CIAL			:20	12:17	2/29/2004 PERMIT EXPIRATION DATE:	
NAME: / TITLE			9/10/2013 03.20 12.17			3/31/2017	
Heath Ward / Executive Director			FAYETTEVILLE S	SHAL	E RELATE	D: N	
Springdale Water Utilities MAILING ADDRESS:			FAYETTEVILLE S	SHAL	E VIOLATIO	DNS: N	
P.O. Box 769					TION PART	ICIPANTS	
city, state, zip: Springdale AR -727650769			NAME/TITLE/PHONE/FAX/EMAIL Matt Holden/Fiel		pector/479-	267-0811, ext. 16	
PHONE & EXT: / FAX:			Alison West/Field Inspector/479-267-0811, ext. 12				
479-751-5751 /			-	ringd	ale Pretrea	tment Manager/479-	
EMAIL:			756-3657	l4		t Dinastan/470 750	
CONTACTED DURING INSPECTION: ***			Jennifer Enos/Wastewater Facility Director/479-756- 3657				
2-2)	aticfac	AREA EVA	LUATIONS sfactory, N=Not Applicable/E	valuatod	n		
** PERMIT	**	FLOW MEASUR		**	STORMW	ATER	
** RECORDS/REPORTS	**	LABORATORY		**	FACILITY SITE REVIEW		
** OPERATION & MAINTENANCE	**	** EFFLUENT/RECEIVING WATER		**		NITORING PROGRAM	
** SAMPLING	** SLUDGE HANDLING/DISPOSAL ** PRET		PRETRE <i>A</i>	TMENT			
** OTHER:		SUMMARY C	E EINDINGS				
No violations were observed at the	time		DE FINDINGS				
The violations word observed at the		от торостот					
		GENERAL (COMMENTS				
Photographs available upon request.							
16-	111	-411)				
INSPECTOR'S SIGNATURE:		N- 0000-	Matt Holden			DATE: 09/24/2015	
/2	/ u. #	in Holden					
SUPERVISOR'S SIGNATURE:	~/):	Jas	on Bolenbaugh			DATE: 9/28/2015	

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

Name of Municipality: City of Springdale

AFIN Number: **72-00003**

NPDES Permit Number(s): AR0022063, ARR00C376

Program Tracked under NPDES Permit Number: AR0022063

Fact Sheet Preparation Date: None/Has summary sheets on some IUs

Date of Last PCI/Audit: May 27, 2010/February 12-14, 2013

Date of Last Annual Report: January 29, 2015

Name of Inspector: Matt Holden

Date PCI Performed: September 17-18, 2015

Name, Title, and Telephone Number of Facility Representative: Jennifer Enos, Wastewater Facility Director, 479-756-3657

Bradley Stewart, Pretreatment Manager, 479-756-3657

Name and Title of Other Participants: Alison West, District 1
Field Inspector

Number of IUs Visited: 2

Name(s) of IUs Visited: Superior Linen Service; Kawneer Company,

Inc.

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

Inspection Report: Springdale Water Utilities, AFIN: 72-00003, Permit #: AR0022063 1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. None 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? Survey water users, telephone listing, drive-by observations, survey new commercial water deposits, industry water consumption review, RCRA notification to doctor's offices, photo processors, etc. 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) 15 6. Number of Categorical Industrial Users: 2 7. How does the POTW determine the appropriate categorical standards to apply to an IU? Requesting official categorization by the ADEQ and reviewing the categorical standards in the Federal Register (40 CFR). 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: Kawneer Co., Inc. Aluminum Forming Anodizing and Painting Sub C Extrusion Part 476.45 Apex Tool Group Metal Finishing Electroplating and Phosphating

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA?

No; technically-based local limits are not needed to meet water quality standards since current discharge levels of the Inspection Report: **Springdale Water Utilities**, AFIN: **72-00003**, Permit #: **AR0022063** analytes in question are far below those required to meet the standards.

- 2. Describe any apparent problems with the local limits. ${\bf NA}$
- 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?

Requirement in

Pollutant: Frequency: Permit: Program: Comments:

Metals:

Influent: 1/quarter 1/quarter Not Req.

Effluent: 1/quarter 1/quarter Not Req.

Sludge: 1/quarter 1/quarter Not Req.

Organics:

Influent: 1/year 1/year Not Req.

Effluent: 1/year 1/year Not Req.

Sludge: 1/year PCBs only Not Req.

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? 15, plus 4 for non-dischargers
- 3. DO ALL <u>SIGNIFICANT</u> <u>IUS</u> 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
	<u>.</u>

D. MONITORING OF IUS BY POTW

1.	Indicate current insrequirement below:	spection and sampling freq	uency and program
		Current frequency:	Program Requirement:
	Sampling:		
	categorical IUs	Varies, more than required	1/year
	other SIUs	Varies, more than required	1/year
	Inspection: categorical IUs	At least 1/year	1/year
	other SIUs	At least 1/year	1/year
2.	HAS EACH SIU BEEN IN	NSPECTED AND SAMPLED AT TH	E FREQUENCY
3.	Are inspections anno	ounced or unannounced?	Yes
4.	Are records kept of	each inspection? Yes	
5.	Does the inspection the following:	report contain an adequat	e description of
	Date and time of ins	spection: Yes	
	Officials present:	Yes	
	Inspection of chemic	cal storage areas: Yes	
		lated processes, categoric of these waste streams: $\underline{\mathbf{y}}$	al waste streams, and
	Inspection of the pr	retreatment facilities: <u>Y</u>	es
	Review of self-monit	coring records: Yes	
	Observation of IU se	elf-monitoring procedures:	Yes
	Verification that ap	pproved analytical techniq	ues are used: Yes
	Verification of IU i	flow measurement (where re	quired): 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).

Are analyses performed in accordance with EPA-approved 8. methods (40 CFR 136)? Yes Are sampling and flow monitoring equipment properly 9. maintained? Yes Is the POTW keeping proper field notes and chain of custody forms? Yes 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? All reports are marked date received. Compliance status is tracked by hand due to high level of compliance. 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

Inspection Report: Springdale Water Utilities, AFIN: 72-00003, Permit #: AR0022063 17. What are the POTW's procedures for following up violations? All violations are responded to in accordance with the Control Authority's Enforcement Response Plan. Action depends on violation type and frequency. 18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?: N/A; no new Categorical IUs since early 1980s. 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: 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: Satisfactory

Ε.	Enforcement
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	ADDRESS EV AND REQUIRE		OLATION OF PRETI	REATMENT
How does t	he POTW res	pond to t	the following vio	olations?
Effluent l	imitations:	(NOV)/recorder, coadm. fine	notice, notice of vocurring exceedance-lease and desist order, publication, revenue of services.	NOV, administrativ er, cost recovery, ocation of permit
Late repor	ts: Informal order.	l notice, N	OV, publication, ad	m. order, show cau
Unpermitte	d discharge	admini cost r	al notice, notice o strative order, cea ecovery, adm. fine, tion of permit and/ e.	se and desist orde publication,
Slug loads	or spills:	administr	notice, notice of varietive order, cease overy, adm. fine, put on of permit and/or	and desist order, ublication,
DEVELOPED SIGNIFICAN 1985)? Yes	IN ACCORDA T VIOLATING	NCE WITH INDUSTRI	OLATORS PUBLISHED EPA REGION VI CH EAL USER (DATED A O significant vi	RITERIA FOR AUGUST 22,
Violator w enforcemen constructi	ithin the l t action wh on is requi	ast 12 mo ich has k red, plea	the criteria for onths, and descripeen taken by the ase indicate whetable compliance s	ibe the POTW. If ther the IU
Name:	Violat	of cion:	Enforcement Action:	Compliance Deadline:
	NA NA		NA	NA NA

	Inspection Report: Springdale Water Utilities, AFIN: 72-00003, Permit #: AR0022063
<u>F.</u>	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: J.B. Hunt Transport, Inc.
2.	located outside its jurisdictional area? Yes, by City
	of Lowell and City Ordinance (Lowell).
3.	Does the POTW have copies of permits for IUs in other cities? Yes, City of Springdale issues permit.
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? No
5.	Comments on multijurisdictional issues: Satisfactory

H. EVALUATION AND COMMENTS

Superior Linen Service IU Visit:

It was observed Superior Linen Services is monitoring flow using the facility water meter, rather than the Pashall flume which is stated in the City of Springdale IU Permit (Control Document). Superior Linen Service does not have a Pashall flume. Brad Stewart, City of Springdale Pretreatment Manager, stated the Parshall flume in the city permit was a typo, and the permit would be updated to reflect the current flow monitoring method at Superior Linen Service. Mr. Stewart stated monitoring wastewater flow via the water meter was an acceptable practice by the City of Springdale at Superior Linen Service. Allen Gilliam, ADEQ Pretreatment Engineer, stated several industrial users throughout AR use water meters for process flow, and in the case of Superior, evaporation estimates would cancel out most of the employees' wastewater.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Kawneer Company, Inc.

POTW Name: Springdale Water Utilities

Industry Contacts: Nick Nathan

Date and Time of Visit: 9/18/2015 10:50-11:50

Description of Manufacturing Process:

Aluminum Forming. Aluminum is extruded then shaped, stretched, and hardened. Depending on product, the aluminum is then anodized, pailed, or left untreated.

Sources of Process Wastewater:

DMP Line: 5 dip tanks (all drains, including floor, go to

pretreatment), phosphatizing bath.

Anodizing Line: 22 dip tanks, all drains to pretreatment

Categorical Industry? Yes

Basis for Limits: Production Based Categorical Standards

Point of Application: Outfall 001, at discharge point

Description of Pretreatment Equipment and Procedures: Waste from DMP Line goes to a mizing pit, pH adjustment, converting Cr(IV) to Cr(III). Caustic used to raise pH. Solids removed in clarifier, solids pressed and removed as haz waste, supernatant discharged to sanitary sewer. Anodizing and die cleaning rinse water overflow are collected in wastewater pit, pH adjusted, mixing in pit 2, further pH adjustment in pit 3, clarifier, sanitary sewer, solids to landfill.

Spill Prevention and Solvent Management Procedures:
Check IU file every inspection for modifications. Slug/spill

evaluation checklist, RPCC, Alarms, secondary containment.

Sampling Location and Equipment:

Outfall 001; Pashall flume in sampling building located on NW side of Kawneer's production facility on Kawneer Drive in Springdale, AR.

Inspection Report: **Springdale Water Utilities**, AFIN: **72-00003**, Permit #: **AR0022063**PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Superior Linen Service

POTW Name: Springdale Water Utilities

Industry Contacts: Brett Wofford

Date and Time of Visit: 09/18/2015 9:45-10:35

Description of Manufacturing Process:

Linens are unloaded, washed, sorted, dried, pressed, steamed, folded, and loaded onto delivery trucks.

Sources of Process Wastewater:

Trench drains underneath the washing machine drain to pretreatment.

Categorical Industry? No

Basis for Limits: Production Based Categorical Standards

Point of Application: Outfall 001

Description of Pretreatment Equipment and Procedures: Wastewater is collected in a holding pit, pumped through a shaker screen into a 2nd and 3rd pit. Wastewater is then pumped into an EQ tank, where polymer is added, and wastewater is sent to the DAF, the discharged to sanitary sewer. Sludge collected in roll off bin.

Spill Prevention and Solvent Management Procedures: Secondary Containment, sludge collected in roll off bin.

Sampling Location and Equipment:

Outfall 001, sampling manhole located in front lawn on south side of facility on Mountain Rd. in Springdale, AR.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

CODE INSPECTOR'S NAME: Matt Holden NAME OF FACILITY: Springdale Water Utilities PERMIT NUMBER USED AR0022063 NPID TO TRACK PROGRAM: September 17-18, 2015 DTIA DATE OF PCI: PPETS WENDB DATA ELEMENTS 15 SIUS NUMBER OF SIGNIFICANT IUS (SIUS): NUMBER OF CATEGORICAL IUS: CIUS SIUS NOT SAMPLED OR INSPECTED BY POTW: NOIN SIUS WITHOUT CONTROL MECHANISM: 0 NOCM SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING: 0 SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS: 0 MSNC SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW: SNIN