

ADEQ

A R K A N S A S
Department of Environmental Quality

September 6, 2016

Steve Mallett, General Manager
Russellville City Corporation
205 W. 3rd Place
Russellville, AR 72811

RE: Russellville City Corporation and Industrial User Inspections (Pope Co)
AFIN: 58-00105 NPDES Permit No.: AR0021768

Dear Mr. Mallett:

On August 10, 2016, District 5 Inspector Travis Harmon 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. Copies of the inspection reports are enclosed for your records.


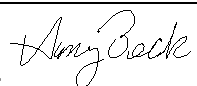
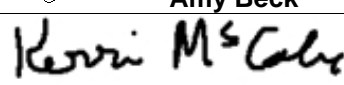
No violations were noted at the time of the inspections. Please refer to each the attached inspection reports for any comments.

If I can be of any assistance, please contact me at beck@adeq.state.ar.us or (479) 968-7339 ext. 16.

Sincerely,



Amy Beck
District 5 Field Inspector
Water Division

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 58-00105		PERMIT #: AR0021768		DATE: 8/10/2016
		COUNTY: 58 Pope			PDS #: 092591	MEDIA: WN
		GPS LAT: 35.248953 LONG: -93.116117 LOCATION: Entrance				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: Russellville City Corporation LOCATION: 404 Jimmy Lyle Road CITY: Russellville			FACILITY TYPE: 1 - Municipal	INSPECTOR ID#: 36537 S - State		
			FACILITY EVALUATION RATING: 3 - Satisfactory	INSPECTION TYPE: Pretreatment Compliance		
			DATE(S): 8/10/2016	ENTRY TIME: 08:45	EXIT TIME: 12:45	PERMIT EFFECTIVE DATE: 10/1/2010 PERMIT EXPIRATION DATE: 9/30/2015
RESPONSIBLE OFFICIAL						
NAME / TITLE: Steve Mallett / General Manager COMPANY: Russellville City Corporation MAILING ADDRESS: 205 W. 3rd Place CITY, STATE, ZIP: Russellville AR 72811 PHONE & EXT. / FAX: 479-968-2080 / EMAIL: smallett@citycorporation.com			FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: ***			
CONTACTED DURING INSPECTION: No			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Megan Jones, City Corp., 479-968-2080x231; mjones@citycorporation.com; Randy Bradley, City Corp.; rbradley@citycorporation.com; Travis Harmon, ADEQ Inspector			
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER	
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW	
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM	
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	**	PRETREATMENT	
S	OTHER: Pretreatment					
SUMMARY OF FINDINGS						
No violations cited.						
GENERAL COMMENTS						
This inspection reveals the Pretreatment Program is undergoing a staffing change, which is delaying some components of the program. Specifically two IU have expired permits, but are operating under a continuance of the previous permit. Inspections of the IUs also seem to be behind schedule; and as at the time of this inspection, eight inspections have been performed of 26 required. Ms. Jones, the new Pretreatment Coordinator, should continue to bring the program up-to-date as necessary.						
ACC, which is an industry discharging to the City's satellite system, needs to be evaluated and permitted by the Pretreatment Program.						
INSPECTOR'S SIGNATURE:  Amy Beck				DATE: 8/24/2016		
SUPERVISOR'S SIGNATURE:  Kerri McCabe				DATE: 9/2/2016		

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: **Russellville City Corporation**

AFIN Number: **58-00105**

NPDES Permit Number(s): **AR0021768**

Program Tracked under NPDES Permit Number: **AR0021768**

Fact Sheet Preparation Date: _____

Date of Last PCI/Audit: **January 2015 - audit**

Date of Last Annual Report: **February 2016**

Name of Inspector: **Amy Beck**

Date PCI Performed: **August 10, 2016**

Name, Title, and Telephone Number of Facility Representative:

Megan Jones, Pretreatment Coordinator, 479-968-2080 ext. 231

Randy Bradley, Wastewater Ops Manager, 479-968-2080 ext.133

Name and Title of Other Participants: **Travis Harmon, Inspector**

Number of IUs Visited: **2**

Name(s) of IUs Visited: **Tyson Foods Tyler Road Facility; Tyson Foods River Valley Hatchery**

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. No change.

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?
Review non-residential applications for water hook up to identify new industrial and commercial users; site visit if necessary. Review HazWaste generator list on ADEQ website.
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) 13
6. Number of Categorical Industrial Users: 3
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Review SIC and base on 403 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:
P.O.M	Metal finishing	Phosphatizing rinse
Taber Metals	Aluminum forming	Contact cooling & quench
Grace Manufacturing	Metal finishing	Phosphatizing rinse

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? No, local limits were determined to be unnecessary at the beginning of the permit cycle. New permit currently in draft status requires City Corp to perform an evaluation of local limits and certify the limits are adequate to protect the treatment works.

2. Describe any apparent problems with the local limits.
N/A

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>1/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>N/A</u>	
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>N/A</u>	
Sludge:	<u>1/year</u>	<u>1/year</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?
Yes, NH3-N violations in January 2016 due to Quaternary Ammonium Compounds (QAC). Ongoing investigation to find the source of the QAC.

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? 11 issued; 2 pending (Taber, PPP)

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.**
Two SIU, Taber Extrusions and Premium Protein Products, have expired permits and are operating under a continuance of the previous permit. Both permits expired on 11/30/2015. The delay is due to staff changes.

4. Does the control document contain the following items?
(Tyson Food's-River Valley Hatchery and Tyson Food's Tyler Road 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: 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, for one permit reviewed.

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/year</u>	<u>2/year</u>
other SIUs	<u>2/year</u>	<u>2/year</u>
Inspection:		
categorical IUs	<u>2/year</u>	<u>2/year</u>
other SIUs	<u>2/year</u>	<u>2/year</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes (2015)

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: Reviewed prior to inspection

Observation of IU self-monitoring procedures: N/A; contract labs used

Verification that approved analytical techniques are used: yes

Verification of IU flow measurement (where required): yes

6. Overall adequacy of inspection documentation: Inspections appear to be thorough, but documentation should include verification of IU processes, BMPs, and P2 as recommended in January 2015 audit.

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, all parameters sampled.
-
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes, certified lab used.
-
9. Are sampling and flow monitoring equipment properly maintained? Yes, sampling bottles cleaned after each use, sample tube for each IU, and pH meter calibrated for each use.
-
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? Pretreatment Coordinator tracks using Excel spreadsheet.
-
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, IU required to send 24-hour notice of exceedance, retest within 30 days, and send results to POTW. NOV issued.
-

17. What are the POTW's procedures for following up violations?
NOV requires a corrective action plan within 30 days of receipt. The plan is reviewed and approved by POTW.

18. **HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?** N/A; no new categorical IU identified.

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: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures: Procedures based on 40 CFR 403.12.

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: NOV

Late reports: NOV

Unpermitted discharges: NOV

Slug loads or spills: 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, printed in local newspaper.

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>Hackney Laddish</u>	<u>Failure to report</u>	<u>NOV</u>	<u>30 days</u>
<u>Premium Protein Products</u>	<u>NH3-N</u>	<u>NOV</u>	<u>30 days</u>
<u>Taber Extrusion</u>	<u>O&G</u>	<u>NOV</u>	<u>30 days</u>
<u>Grace Manufacturing</u>	<u>Chromium</u>	<u>NOV</u>	<u>30 days</u>
<u>P.O.M.</u>	<u>Chromium</u>	<u>NOV</u>	<u>30 days</u>

5. Comments on the POTW's enforcement procedures:

Violations have increased since the last PCI. POTW appears to have a good working relationship with IUs. NOV and correction plan generally correct issues; IU monetary fines have not been required.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? N/A

2. Are staffing levels adequate? No, but staff levels are being improved ; dedicating the Pretreatment Coordinator to pretreatment responsibilities, adding Intern, and possibly other positions.

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:
Aqua Contour Cutting (ACC) discharge to Dover collection system.

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? Yes, 2015 ordinance.

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: ACC needs to be evaluated and permitted by the Pretreatment program.

H. EVALUATION AND COMMENTS

Aqua Contour Cutting (ACC) is an industry located outside of Russellville discharging wastewater to the City of Dover collection system. Dover is a satellite system of Russellville. Past investigation into ACC reveals they have a zirconization metal finishing process. On April 11, 2016 EPA issued a memo titled "Coverage for ZirconizationTM Under 40 CFR Part 433 (Metal Finishing ELG)." The conclusion of the memo is that zirconization is subject to the Metal Finishing ELG.

The Russellville City Corp pretreatment program is undergoing reorganization. This inspection reveals the program is behind schedule for IU inspections due to training and familiarizing the new Pretreatment Coordinator, Ms. Megan Jones. Ms. Jones should continue to learn the program and work to implement all pretreatment requirements in a timely manner.

Two IU, Taber Extrusion and Premium Protein Products, have expired permits. These facilities are operating under a continuance of the permit.

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: **Tyson Foods, Inc. - Tyler Road Facility**

POTW Name: **Russellville City Corporation**

Industry Contacts: **Dave Evans, Rick Owens**

Date and Time of Visit: **8/10/2016 at 11:00 am**

Description of Manufacturing Process:

**Further processing of chicken products; bread and battering per
Specifications; flash frying of products.**

Sources of Process Wastewater:

Produced chicken fluids; clean-up of production lines.

Categorical Industry? **No**

Basis for Limits: **Local limit for pH. Report BOD5, TSS, O&G
with surcharge limits for BOD5 and TSS.**

Point of Application: **Facility outfall to collection system.**

Description of Pretreatment Equipment and Procedures:

**Screens, settling, DAF with polymer addition, equalization basin
with aeration (3 tanks).**

Spill Prevention and Solvent Management Procedures:

**Spill kits, oil dry, pigs on-site. Spill prevention plan in
place.**

Sampling Location and Equipment:

Samples collected by contract lab (EEG) at north manhole.

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: **Tyson Foods Inc. - River Valley Hatchery**

POTW Name: **Russellville City Corporation**

Industry Contacts: **Dave Evans, Suzy Danzy**

Date and Time of Visit: **8/10/2016 at 11:50**

Description of Manufacturing Process:
Eggs received, held, incubated, vaccinated, and shipped to growers.

Sources of Process Wastewater:
Wash and sanitize incubators and equipment.

Categorical Industry? **No**

Basis for Limits: **Local limit for pH. Report BOD5, TSS, O&G with surcharge limits for BOD5 and TSS.**

Point of Application: **Facility outfall to collection system**

Description of Pretreatment Equipment and Procedures:
Screens/filters placed in floor drains throughout plant.

Spill Prevention and Solvent Management Procedures:
N/A

Sampling Location and Equipment:
Samples collected by contract lab (EEG) at manhole.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Amy Beck</u>	
NAME OF FACILITY:	<u>Russellville City Corp WWTP</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021768</u>	NPID
DATE OF PCI:	<u>August 10, 2016</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>13</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>3</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0 (2015)</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>5</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