

# ADEQ

ARKANSAS  
Department of Environmental Quality

April 14, 2017

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

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

Dear Mr. Smith:

On April 10, 2017, I performed an Industrial User Inspection of the above-referenced facility in response to a complaint 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](mailto:youngm@adeq.state.ar.us) or (501) 837-2073.

Sincerely,



Michael Young  
District 8 Field Inspector  
Water Division



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

## WATER DIVISION INSPECTION REPORT

AFIN: <b>70-00341</b>	PERMIT #: <b>AR0033723</b>	DATE: <b>4/10/2017</b>
COUNTY: <b>70 Union</b>	PDS #: <b>096522</b>	MEDIA: <b>WN</b>
GPS LAT: <b>33.185228</b> LONG: <b>-92.747856</b> LOCATION: <b>Entrance</b>		

FACILITY INFORMATION	INSPECTION INFORMATION	
<small>NAME:</small> <b>El Dorado Water Utilities - South Plant</b> <small>LOCATION:</small> <b>325 Quail Crossing</b> <small>CITY:</small> <b>El Dorado, AR 71730</b>	<small>FACILITY TYPE:</small> <b>1 - Municipal</b> <small>INSPECTOR ID#:</small> <b>101531 S - State</b> <small>FACILITY EVALUATION RATING:</small> <b>5 - Satisfactory</b> <small>INSPECTION TYPE:</small> <b>Industrial User</b> <small>DATE(S):</small> <small>ENTRY TIME:</small> <small>EXIT TIME:</small> <small>PERMIT EFFECTIVE DATE:</small> <b>4/10/2017</b> <b>14:00</b> <b>16:30</b> <b>1/1/2015</b> <small>PERMIT EXPIRATION DATE:</small> <b>12/31/2019</b>	
RESPONSIBLE OFFICIAL		
<small>NAME / TITLE</small> <b>Mark Smith / General Manager</b> <small>COMPANY:</small> <b>El Dorado Water Utilities</b> <small>MAILING ADDRESS:</small> <b>P.O. Box 1587</b> <small>CITY, STATE, ZIP:</small> <b>El Dorado AR 71731</b> <small>PHONE &amp; EXT. / FAX:</small> <b>870-862-6451 /</b> <small>EMAIL:</small> <b>mark@eldoradowater.com</b> CONTACTED DURING INSPECTION: <b>No</b>	<small>FAYETTEVILLE SHALE RELATED:</small> <b>N</b> <small>FAYETTEVILLE SHALE VIOLATIONS:</small> <b>N</b> <div style="background-color: #cccccc; text-align: center; padding: 2px;"><b>INSPECTION PARTICIPANTS</b></div> <small>NAME/TITLE/PHONE/FAX/EMAIL/ETC.:</small> <b>Jay Honeycutt/EWU Pretreatment Coordinator/870-862-6451</b> <b>Buddy Bradley/Co-owner/870-862-1602/sandy.smith@fracnvac.com</b> <b>Clark Burton/Co-owner and Manager/870-862-2399/cburton@duckwaterservices.com</b>	
AREA EVALUATIONS		
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)		
<b>S</b> PERMIT	<b>S</b> FLOW MEASUREMENT	<b>N</b> STORMWATER
<b>S</b> RECORDS/REPORTS	<b>S</b> LABORATORY	<b>S</b> FACILITY SITE REVIEW
<b>N</b> OPERATION & MAINTENANCE	<b>S</b> EFFLUENT/RECEIVING WATER	<b>S</b> SELF-MONITORING PROGRAM
<b>S</b> SAMPLING	<b>N</b> SLUDGE HANDLING/DISPOSAL	<b>S</b> PRETREATMENT
<b>**</b> OTHER:		
SUMMARY OF FINDINGS		
<b>No violations observed at time of inspection.</b>		

**GENERAL COMMENTS**

On April 6, 2017, I received a complaint alleging that there were concerns about Duckwater Services, LLC in El Dorado, AR. Duckwater Services is a Significant User and a designated pretreatment facility, which is permitted by El Dorado Water Utility (EWU). The effective date of the permit from EWU is June 23, 2016 and it expires September 30, 2020. Parameters are analyzed by EWU for each batch (Table 1) and the system is designed to have a controlled release of treated wastewater to manage slug loads. A Pollutant Management Plan certification statement is required by EWU semi-annually in March and October.


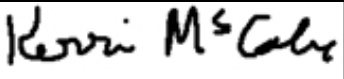
The facility is designed to wash the exterior of trucks, perform service, and can perform interior tank washing of chemical tankers. If a truck arrives with residual hazardous waste products, the products are removed and placed in packed drums, stored, and disposed of according to the facility's Hazardous Waste Permit (ARR000026195). There were no hazardous waste products in storage during the inspection. The floor of the facility is designed to drain to a central trough that carries wastewater to a treatment device (see Photo 1 and 3). The facility also has boiler blowdown that is routed to the treatment device (see Photo 2). Cleaning materials and any hazardous materials awaiting disposal are staged in a room that has spill protection to the central drain (see Photo 4). Water from the sludge dewatering process is returned to the central trough as well (see Photo 6). Wastewater is pumped (see Photo 7) to a holding tank (see Photo 8) and then into a 6,000-gal batch reactor with agitation. There is a sample point for quality control and treatment on the batch reactor (see Photo 9). The batch reactor is treated with alum, acid and a coagulant for treatment and monitored for temperature and pH (see Photo 13). During the inspection, there was wastewater in the batch reactor settling (see Photos 11-12). Flow is required to be monitored (see Photo 14) and adjusted so there are no slug loads, and the monitoring location for treated wastewater is after the flow device (see Photo 15). I observed the lift station that serves Duckwater Services and several other businesses and there were no colors, odors, or solids observed (see Photo 17).

The treatment system is described by the facility at the following website:

<http://duckwaterservices.com/wastewater.html>

No response is needed by El Dorado Water Utility.

A separate inspection report was sent to Duckwater Services, LLC in regards to operating without Industrial Stormwater General Permit (IGP; ARR000000) coverage.

INSPECTOR'S SIGNATURE:  Michael Young	DATE: 4/13/2017
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 4/14/2017

**POTW Pretreatment Program**

**Industrial Site Visit**

**Name of Industry: Duckwater Services, LLC**

**Industry Contacts: Buddy Bradley; Clark Burton**

**Type of Industry: Truck Wash and Repair**

**Date of Visit: 4/10/2017**

- |     |   |           |         |          |
|-----|---|-----------|---------|----------|
| 1.  | Significant industrial user:                          | X_____Yes | _____No | _____N/A |
| 2.  | Pretreatment equipment or procedures?                 | X_____Yes | _____No | _____N/A |
| 3.  | Pretreatment equipment maintained<br>and operational? | X_____Yes | _____No | _____N/A |
| 4.  | Hazardous waste generated or stored?                  | X_____Yes | _____No | _____N/A |
| 5.  | Proper solid waste disposal?                          | X_____Yes | _____No | _____N/A |
| 6.  | Solvent management/TTO control?                       | X_____Yes | _____No | _____N/A |
| 7.  | Suitable sampling location?                           | X_____Yes | _____No | _____N/A |
| 8.  | Appropriate self-monitoring<br>procedures/equipment?  | X_____Yes | _____No | _____N/A |
| 9.  | Adequate spill prevention?                            | X_____Yes | _____No | _____N/A |
| 10. | Industry familiar with limits<br>and requirements?    | X_____Yes | _____No | _____N/A |

**Additional Comments: Solid waste disposed at Waste Corporation of America Union County Landfill. Hazardous Waste disposed of by US Ecology out of Baton Rouge, LA**

**Visit Conducted By: Michael Young (ADEQ) and Jay Honeycutt (EWU)**

**Date of Report: 4/13/2017**

**Water Division Photographic Evidence Sheet**

Location:	<b>El Dorado Water Utilities - South Plant</b>		
Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Witness:	<b>Jay Honeycutt; Clark Burton</b>	Time:	<b>14:43</b>
		Photo #:	<b>1</b>
Description:	<b>Floor drain circled in red. Floor is built to flow to central drainage.</b>		



Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Witness:	<b>Jay Honeycutt; Clark Burton</b>	Time:	<b>14:43</b>
		Photo #:	<b>2</b>
Description:	<b>Boiler blowdown is also released to central drain and to pretreatment unit.</b>		



Water Division Photographic Evidence Sheet			
Location:	El Dorado Water Utilities - South Plant		
Photographer:	Michael Young	Date:	04/10/2017
Time:	14:43	Witness:	Jay Honeycutt; Clark Burton
Photo #:	3	Description:	Central drain and flow direction.



Photographer:	Michael Young	Date:	04/10/2017
Time:	14:44	Witness:	Jay Honeycutt; Clark Burton
Photo #:	4	Description:	Chemicals used for cleaning and repair. Spills would drain to central floor drain.



**Water Division Photographic Evidence Sheet**

Location:	<b>El Dorado Water Utilities - South Plant</b>		
Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Witness:	<b>Jay Honeycutt; Clark Burton</b>	Time:	<b>14:45</b>
		Photo #:	<b>5</b>
Description:	<b>Floor is sloped to direct water to central floor drain in both wash bays.</b>		



Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Witness:	<b>Jay Honeycutt; Clark Burton</b>	Time:	<b>14:45</b>
		Photo #:	<b>6</b>
Description:	<b>Sludge is dewatered and water is returned to treatment unit.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>El Dorado Water Utilities - So</b>		
Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Time:	<b>14:46</b>	Witness:	<b>Jay Honeycutt; Clark Burton</b>
Photo #:	<b>7</b>	Description:	<b>Pump used to transfer wastewater to holding tank.</b>



Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Time:	<b>14:46</b>	Witness:	<b>Jay Honeycutt; Clark Burton</b>
Photo #:	<b>8</b>	Description:	<b>Wastewater holding tank.</b>





**Water Division Photographic Evidence Sheet**

Location:	<b>El Dorado Water Utilities - South Plant</b>		
Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Time:	<b>14:47</b>	Witness:	<b>Jay Honeycutt; Clark Burton</b>
Photo #:	<b>9</b>	Description:	<b>Valve to take quality control samples for treatment indications.</b>



Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Time:	<b>14:47</b>	Witness:	<b>Jay Honeycutt; Clark Burton</b>
Photo #:	<b>10</b>	Description:	<b>Release from batch reactor to treated wastewater holding tank.</b>



**Water Division Photographic Evidence Sheet**

Location:	<b>El Dorado Water Utilities - South Plant</b>		
Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Time:	<b>14:48</b>	Witness:	<b>Jay Honeycutt; Clark Burton</b>
Photo #:	<b>11</b>	Description:	<b>Wastewater was settling during inspection. Red tint product of red resin washout.</b>



Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Time:	<b>14:48</b>	Witness:	<b>Jay Honeycutt; Clark Burton</b>
Photo #:	<b>12</b>	Description:	<b>Flocculation of waste materials that will eventually settle.</b>



**Water Division Photographic Evidence Sheet**

Location:	<b>El Dorado Water Utilities - South Plant</b>		
Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Witness:	<b>Jay Honeycutt; Clark Burton</b>	Time:	<b>14:48</b>
Description:	<b>pH monitor for wastewater.</b>	Photo #:	<b>13</b>



Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>
Witness:	<b>Jay Honeycutt; Clark Burton</b>	Time:	<b>14:56</b>
Description:	<b>Flow device prior to EWU monitoring location and discharge to sanitary sewer.</b>	Photo #:	<b>14</b>



<b>Water Division Photographic Evidence Sheet</b>				
Location:	<b>El Dorado Water Utilities - South Plant</b>			
Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>	
Witness:	<b>Jay Honeycutt; Clark Burton</b>	Time:	<b>14:56</b>	
Description:	<b>EWU monitoring location.</b>		Photo #:	<b>15</b>



Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>	Time:	<b>14:56</b>
Witness:	<b>Jay Honeycutt; Clark Burton</b>	Photo #:	<b>16</b>		
Description:	<b>Oil water separator. Stormwater is returned to the treatment unit.</b>				



**Water Division Photographic Evidence Sheet**

Location:	<b>El Dorado Water Utilities - South Plant</b>				
Photographer:	<b>Michael Young</b>	Date:	<b>04/10/2017</b>	Time:	<b>15:02</b>
Witness:	<b>Jay Honeycutt; Clark Burton</b>			Photo #:	<b>17</b>
Description:	<b>Lift station that serves Duckwater Services, LLC. No materials on surface and no odors present.</b>				



**Table 1. Locally regulated total plant discharge as permitted by EI Dorado Water Utility Pretreatment Program.**

Parameter	Max Mo. Avg. (mg/L)	Daily Max (mg/L)	Sample Frequency	Sample Type
pH	---	6-9	Each Batch	Grab
Oil and Grease	(B)	(B)	Monthly	Grab
Arsenic	0.073	0.15	Monthly	Grab
Cadmium	0.07	0.11	Monthly	Grab
Chromium	0.45	0.9	Monthly	Grab
T. Cyanide	0.215	0.432	Monthly	Grab
Copper	0.26	0.52	Monthly	Grab
Lead	0.23	0.46	Monthly	Grab
Mercury	ND	ND	Monthly	Grab
Molybdenum	0.2	0.4	Monthly	Grab
Nickel	2.38	3.98	Monthly	Grab
Selenium	0.1	0.2	Monthly	Grab
Silver	0.057	0.12	Monthly	Grab
Zinc	1.48	2.63	Monthly	Grab
BNA	---	---	Annually	Grab
VOA	---	---	Annually	Grab
Pest/PCB's	---	---	Annually	Grab
2,3,7,8 TCDD	---	---	Annually	Grab

(B) - Oil and Grease in excess of 100 mg/L are subject to an excess strength surcharge of 5¢ per pound