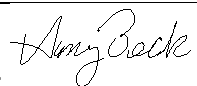
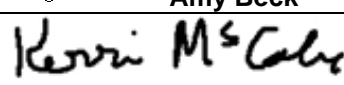
 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 23-01095		PERMIT #: AR0051951		DATE: 5/23/2018
		COUNTY: 23 Faulkner			PDS #: 103548	MEDIA: WN
		GPS LAT: 35.054659 LONG: -92.534864 LOCATION: Entrance				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: Tupelo Bayou WWTP LOCATION: 1405 Lollie Road CITY: Conway			FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 36537 S - State	
			FACILITY EVALUATION RATING: 3 - Satisfactory		INSPECTION TYPE: Pretreatment Compliance	
			DATE(S): 5/23/2018	ENTRY TIME: 09:30	EXIT TIME: 12:00	PERMIT EFFECTIVE DATE: 1/1/2017 PERMIT EXPIRATION DATE: 12/31/2021
RESPONSIBLE OFFICIAL						
NAME / TITLE: Gregory Dell / Chief Operating Officer COMPANY: Conway Corporation MAILING ADDRESS: P.O. Box 99 CITY, STATE, ZIP: Conway AR 72033 PHONE & EXT. / FAX: 501-450-6063 / 501-450-6093 EMAIL: greg.dell@conwaycorp.com			FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: No			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Trey Lieblong, Environmental Coordinator, 501-450-6080, trey.lieblong@conwaycorp.com			
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	S	PRETREATMENT	
**	OTHER:					
SUMMARY OF FINDINGS						
No violations were noted during this inspection.						
GENERAL COMMENTS						
I inspected Conway Corp's pretreatment program on May 23, 2018. Inspection consisted of program overview, records review, and two Industrial User (IU) field assessments. Conway Corp continues to run a quality pretreatment program. The facility works closely with the IU to protect the WWTP and ensure compliance with the pretreatment program. Pretreatment staff is knowledgeable about all aspects of the program and inspections and monitoring are complete and documented. Records are organized and easily accessible. Technically Based Local Limits (TBLL) have been submitted and approved by the Department and pretreatment limits to the WWTP have been adjusted accordingly. The WWTP has not experienced pass through or interference from their IU.						
INSPECTOR'S SIGNATURE:  Amy Beck				DATE: 6/8/2018		
SUPERVISOR'S SIGNATURE:  Kerri McCabe				DATE: 6/29/2018		

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

Name of Municipality: Conway Corporation

AFIN Number: 23-01095

NPDES Permit Number(s): AR0051951, ARR001527

Program Tracked under NPDES Permit Number: AR0051951

Fact Sheet Preparation Date: _____

Date of Last PCI/Audit: September 2016 - Audit

Date of Last Annual Report: April 28, 2017

Name of Inspector: Amy Beck

Date PCI Performed: May 22, 2018

Name, Title, and Telephone Number of Facility Representative:
Trey Lieblong, Environmental Coordinator, 501-450-6080

Name and Title of Other Participants: N/A

Number of IUs Visited: 2

Name(s) of IUs Visited: DBG, SFI

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. Age went out of business in 2017 and has been removed from the program. IC Corp has changed name to DGB. Process and waste stream is the same.

2. Has ADEQ or EPA been notified of these changes? No

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

4. What procedures are being used to update the IU Survey? All new industrial permits processed through Conway Corp's Environmental Coordinator. Spot checks on businesses listed on Hazardous Waste Generator and Conway Business lists.

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) 15

6. Number of Categorical Industrial Users: 6

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Based on 403 regulations; EPA guidelines.

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:
Southern E-Coat	Metal finishing	Phosphatizing rinse
DBG	Metal finishing	Phosphatizing rinse
SFI of Arkansas	Metal finishing	Phosphatizing rinse
Tokusen	Metal finishing	Brass plating
Valley Plating	Metal finishing	Chrome plating
Virco Manufacturing	Metal finishing	Phosphatizing rinse

B. LOCAL LIMITS

1. **IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA?** POTW has demonstrated local limits are not necessary.

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:	Permit:	Requirement in Program:	Comments:
Metals:				
Influent:	<u>Monthly</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Effluent:	<u>Monthly</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Sludge:	<u>Monthly</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Organics:				
Influent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/quarter</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>1/quarter</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 upsets.

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

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, all SIU have current permits.

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: N/A – POTW monitors all IU

IU reporting requirements: N/A

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:
- | | | |
|-----------------|--------------------|----------------------|
| Sampling: | Current frequency: | Program Requirement: |
| categorical IUs | <u>Monthly</u> | <u>Monthly</u> |
| other SIUs | <u>Quarterly</u> | <u>Quarterly</u> |
| Inspection: | | |
| categorical IUs | <u>Annually</u> | <u>Annually</u> |
| other SIUs | <u>Annually</u> | <u>Annually</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: N/A
- Observation of IU self-monitoring procedures: N/A
- Verification that approved analytical techniques are used: N/A
- Verification of IU flow measurement (where required): N/A
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). All parameters are sampled.**
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? Reminder letter sent to IU prior to renewal; spreadsheet tracking, hard copies on file.
15. **ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?** N/A; no self-monitoring required; Conway Corp. performs all required sampling.
16. **IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?** Yes; retest and if necessary, send NOV and require compliance plan.

17. What are the POTW's procedures for following up violations?
Resample and then send notice of violation; IU responds explaining the reason for violation.

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: **(reviewed IC Corp BMR dated 7/6/17)**

Name and address: Yes

Other environmental permits held: No

Description of operations: Yes

Process flow diagrams: Yes

Flow measurements: Yes – water consumption

Measurements of regulated pollutants: Yes

Certification of compliance by the IU: Yes

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures: **POTW is meeting all inspection and sampling requirements. POTW maintains a good working relationship with the IU visited.**

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: Retest; NOV

Late reports: N/A – reporting not required

Unpermitted discharges: NOV; permitting or disconnect water

Slug loads or spills: Report;, 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

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>Arkansas Box</u>	<u>Copper</u>	<u>NOV; public notice of violation</u>	<u>Compliance achieved</u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>

5. Comments on the POTW's enforcement procedures:

Procedures are effective.

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?

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:

service facilities outside the city limits.

Conway Corp does not

H. EVALUATION AND COMMENTS

IC Corp has sold to DBG. The process, waste stream, and pre-treatment process is the same. Permit documents need to be updated to reflect the IU new name and officials.

The pretreatment program continues to be well-organized and efficiently run. Annual reports are submitted in a timely manner. The POTW appears to have a good working relationship with IU.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: DBG

POTW Name: Tupelo Bayou POTW

Industry Contacts: Mark Bailey, Engineering & Facilities Manager

Date and Time of Visit: May 23, 2018 10:30am

Description of Manufacturing Process:

This facility is a metal fabrication shop and makes bus body and various other parts.

Sources of Process Wastewater:

Wastewater comes from the painting phosphatizing rinse process.

Categorical Industry? Yes

Basis for Limits: EPA limits

Point of Application: End of treatment

Description of Pretreatment Equipment and Procedures:

Rinse water from the paint line is pumped to treatment tank. The pH is raised (sodium hydroxide). Coagulant (calcium chloride) and flocculent are separately mixed and the tank is allowed to settle. The water is then pumped through an ion exchange (carbon and resin filters) for polishing prior to discharge to the POTW.

Spill Prevention and Solvent Management Procedures:

Process contained inside building; no floor drain.

Sampling Location and Equipment:

POTW uses ISCO composite sampler after the ion exchange.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **SFI**

POTW Name: **Tupelo Bayou**

Industry Contacts: **Gary Harlan**

Date and Time of Visit: **May 23, 2018; 11:30**

Description of Manufacturing Process:
 This facility is a metal fabrication shop and makes tractor and various other parts.

Sources of Process Wastewater:
 Phosphatizing rinse from powder coat paint process.

Categorical Industry? **Yes**

Basis for Limits: **EPA limits**

Point of Application: **End of treatment**

Description of Pretreatment Equipment and Procedures:
 Single settling pit

Spill Prevention and Solvent Management Procedures:
 Treatment is inside building and concrete floor slopes to pit.

Sampling Location and Equipment:
 POTW uses ISCO composite sampler to pull samples from the pits.

PPETS CODE SHEET
 PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Amy Beck</u>	
NAME OF FACILITY:	<u>Tupelo Bayou POTW</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0051951</u>	NPID
DATE OF PCI:	<u>May 24, 2018</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>15</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>6</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>1</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