

# ADEQ

ARKANSAS  
Department of Environmental Quality

February 20, 2019

Daniel Dawson, General Manager  
Searcy Board of Public Utilities  
P.O. Box 1319  
Searcy, AR 72145

RE: Searcy WWTP Inspection  
AFIN: 73-00055 Permit No.: AR0021601

Dear Mr. Dawson:

On February 4 and 5, 2019, I performed 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.

**Please refer to the “Summary of Findings” section of the attached inspection report and provide a written response for each item that was noted.** This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address at the bottom of this letter or e-mailed to [Water-Inspection-Report@adeq.state.ar.us](mailto:Water-Inspection-Report@adeq.state.ar.us). This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by **March 20, 2019**.


If I can be of any assistance, please contact me at 501-682-0659 or [Bolenbaugh@adeq.state.ar.us](mailto:Bolenbaugh@adeq.state.ar.us).

Sincerely,




Jason Bolenbaugh  
Compliance Branch Manager  
Office of Water Quality

CC: Mr. Jimmy Smith, Searcy WWTP Manager, [jsmith67@cablelynx.com](mailto:jsmith67@cablelynx.com)

 <b>A R K A N S A S</b> Department of Environmental Quality		<b>WATER DIVISION INSPECTION REPORT</b>						
		AFIN: <b>73-00055</b>		PERMIT #: <b>AR0021601</b>		DATE: <b>2/4/2019</b>		
		COUNTY: <b>73 White</b>			PDS #: <b>106610</b>		MEDIA: <b>WN</b>	
		GPS LAT: <b>35.268201</b> LONG: <b>-91.716098</b> LOCATION: <b>Entrance</b>						
<b>FACILITY INFORMATION</b>				<b>INSPECTION INFORMATION</b>				
NAME: <b>Searcy WWTP</b> LOCATION: <b>260 North Bypass</b> CITY: <b>Searcy</b>				FACILITY TYPE: <b>1 - Municipal</b>		INSPECTOR ID#: <b>83321 S - State</b>		
				FACILITY EVALUATION RATING: <b>3 - Satisfactory</b>		INSPECTION TYPE: <b>Pretreatment Compliance</b>		
				DATE(S): <b>2/4/2019</b>	ENTRY TIME: <b>09:00</b>	EXIT TIME: <b>14:00</b>	PERMIT EFFECTIVE DATE: <b>10/1/2013</b>	
				<b>2/5/2019</b>	<b>08:30</b>	<b>11:00</b>	PERMIT EXPIRATION DATE: <b>9/30/2018</b>	
<b>RESPONSIBLE OFFICIAL</b>				<b>INSPECTION PARTICIPANTS</b>				
NAME / TITLE: <b>Daniel Dawson / General Manager</b> COMPANY: <b>Searcy Board of Public Utilities</b> MAILING ADDRESS: <b>P.O. Box 1319</b> CITY, STATE, ZIP: <b>Searcy AR 72145</b> PHONE & EXT. / FAX: <b>501-268-2481 /</b> EMAIL: <b>d.dawson@cablelynx.com</b>				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Jimmy Smith, WWTP Manager, 501-268-1679</b> <b>Spencer Oyemaja, Pretreatment Coordinator, 501-268-1679</b> <b>Keith Waters, ADEQ Inspector, 501-683-6629</b>				
CONTACTED DURING INSPECTION: <b>No</b>								
<b>AREA EVALUATIONS</b>								
(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	**		
**	OTHER:	**		**		**		
<b>SUMMARY OF FINDINGS</b>								
<ul style="list-style-type: none"> <li>• A review of the Industrial User Surveys needs to be conducted. During the inspection it was determined the average monthly wastewater flow data may be incorrect on some of the non-categorical industrial users since the flow data provided on the surveys were less than 25,000 gallons per day threshold.</li> <li>• A final determination of how many industrial users there are in the pretreatment program must be made. The program coordinator indicated Baker-Hughes is no longer in business but the facilities pretreatment permit remains active.</li> <li>• A review of Eaton Hydraulics pretreatment permit indicated the Sample Type is not accurate. All parameters listed under "See Note 3" are to be composite samples according to the permit however, this is not accurate. A revision of the permit is required that correctly identifies the sample type for each parameter.</li> <li>• The POTW's chain-of-custodies (COC) are incorrect. All COCs for Eaton Hydraulics indicate grab samples were taken during sampling periods. However, this is incorrect and the pretreatment coordinator acknowledged composite and grab samples have been taken in accordance with the permit. Please ensure all COCs are completed correctly.</li> </ul>								

**GENERAL COMMENTS**

- The POTW does a great job of submitting their annual reports in a timely manner. All inspection reports reviewed were very thorough.
- All of the sampling information was available for review but suggestions were made to file all pretreatment documentation together. For example, the bench sheets were not maintained with the COCs but were filed with all other bench sheets for that given day. It was recommended a copy of the pretreatment parameter bench sheets be made and filed with the pretreatment sampling documentation.
- During each SIU visit it appeared the POTW staff had good working relationships with each industrial contact.
- BOD, TSS, and Oil & Grease limitations, if exceeded, are not considered violations of the permit but are listed in the permit for the purpose of determining applicability to the City of Searcy Ordinance #679 (the surcharge ordinance).

INSPECTOR'S SIGNATURE: <small>←Click text to left to add signature</small>	-Inspector Name	DATE:
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 2/28/2019

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY**

**PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT**

---

Name of Municipality: City of Searcy

AFIN Number: 73-00055

NPDES Permit Number(s): AR0021601, ARR00C389

Program Tracked under NPDES Permit Number: AR0021601

Fact Sheet Preparation Date: \_\_\_\_\_

Date of Last PCI/Audit: 10/9/2014 (PCI), 8/20/2013 (Audit)

Date of Last Annual Report: 3/13/2018

Name of Inspector: Jason Bolenbaugh (lead), Keith Waters

Date PCI Performed: 2/4/2019 - 2/5/2019

Name, Title, and Telephone Number of Facility Representative:  
Jimmy Smith, WWTP Manager, 501-268-1679  
Spencer Oyemaja, Pretreatment Coordinator, 501-268-1679

Name and Title of Other Participants: None

---

Number of IUs Visited: 2

Name(s) of IUs Visited: Eaton Hydraulics, Cintas Laundry

---

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.**

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.  
**One, Baker-Hughes appears to no longer be in business and has been removed from the program, however, their permit was still active. The POTW was going to follow-up.**

---

2. Has ADEQ or EPA been notified of these changes? No
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** No Updates
4. What procedures are being used to update the IU Survey?  
**Three (3) IU surveys were reviewed. One from 2014 (Eaton) and two (2) from 2017. The IU survey had not changed between the 2014 and 2017 versions. It appears the POTW is sending the survey form to the SIU prior to each permit renewal but it could not be confirmed due to staff changes.**

---

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 (Eaton Hydraulics)
7. How does the POTW determine the appropriate categorical standards to apply to an IU?  
**40CFR 433**

---

8. List all categorical IUs (**Bold**) discharging under the approved program. All other listings are non-categorical IUs.

<u>Name of IU</u>	<u>Category</u>	<u>Regulated Process</u>
<b>Eaton Hydraulics</b>	<b>Metal Finishing</b>	<b>Nickel Plating, etc.</b>
Bryce Company	Plastic Bag & Pouch Manufacturing	
Unity Health-South	Medical & Surgical Hospital	
XPO Logistics	Truck Trailer Manufacture	
Cintas	Linen Supply	
United Health-North	Medical & Surgical Hospital	
Yarnell Operations LLC	Ice Cream/Frozen Dessert Manufacturing	
Walmart Dist.	General Warehousing & Storage	
Schulze & B.	Frozen Dessert Manufacturing	
Land O'Frost	Food Manufacturing/Meat Processing	

B. LOCAL LIMITS

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

---

2. Describe any apparent problems with the local limits.  
**Maybe 6 of 9 of the non-categorical SIU's pay a surcharge for exceeding BOD and TSS limits. These are not considered permit violations under City Ordinance #679.**

---

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 and Part II, Condition 7.c of the NPDES permit?

Pollutant:	Frequency:	Permit:	Program:	Comments:
<b><u>Metals:</u></b>				
Influent:	<u>4</u>	<u>4</u>	<u>4</u>	
Effluent:	<u>4</u>	<u>4</u>	<u>4</u>	
Sludge:	<u>4</u>	<u>4</u>	<u>4</u>	
<b><u>Organics:</u></b>				
Influent:	<u>1</u>	<u>1</u>	<u>1</u>	
Effluent:	<u>1</u>	<u>1</u>	<u>1</u>	
Sludge:	<u>1</u>	<u>1</u>	<u>1</u>	

4. Have there been any inhibitions or upsets at the POTW (since the last PCI or 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?  
**Did have a minor change in the plant in the aeration basin believed to be the cause of an SIU discharge but it did not upset the plant or cause any permit violations.**

---

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? 10 (not counting Baker Hughes)

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.

---

All permits are current and expire on March 15, 2020.

---

4. Does the control document contain the following items?

An expiration date: Yes

Discharge limitations: Yes (Final Effluent Limits in Permit)

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: Yes (once/month)

IU reporting requirements: Yes (last day of the month in which the monitoring period ended.)

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes (Section 1)

Type of sample: Yes Section 1)

Monitoring frequency: Yes (Section 1)

Bypass prohibition: Yes (Section 3.I)

Right of entry: Yes (Section 3.H)

Nontransferability: Yes (Section 3.L)

Revocation clause: Yes (Section 3.N)

Penalty Provisions: Yes (Section 3.N)

Slug load notification: Yes (Section 3.G)

Notification of process change: Yes (Section 3.K)

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 (Semi-annual)</u>	<u>Annual</u>
other SIUs	<u>2 (Semi-annual)</u>	<u>Annual</u>
Inspection:		
categorical IUs	<u>1 (Annual)</u>	<u>Annual</u>
other SIUs	<u>1 (Annual)</u>	<u>Annual</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: Overall - Good.  
Report includes specific contact information for the  
inspectors and facility; description of the manufacturing  
process and treatment process; types of chemicals used;  
hazardous waste materials and storage; flow monitoring and  
sampling information, and more.



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. The POTW samples each IU twice per year.**
- 
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? **Errors in grab/composite sample on the COC.**
- 
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?  
**They keep a log of all received reports.**
- 
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?  
**Yes. The City maintains a folder for each SIU that has the sample analysis results.**
- 
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?  
**The POTW will send Notice of Violations if the permittee Violates other parameter effluent limitations such as pH or Metals. No NOV's were issued in 2018.**
- 
17. What are the POTW's procedures for following up violations?  
**Issue a Notice of Violation; resample within 30 days when applicable; permittee should notify within 24-hours; cease and desist if necessary.**
- 
18. HAS THE POTW REVIEWED Baseline Monitoring Reports (BMRS) FOR COMPLIANCE WITH 40 CFR 403.12(b)?  
**No BMRS were reviewed since no new categorical SIUs were Added to the pretreatment program.**
-

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:           **Please see Summary of Findings and/or General Comments section of the inspection report.**          

---

---

---

---

---

---

---

---

---

---

E. Enforcement

1. **HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS?**

Yes. The POTW has not had to take enforcement actions against an IU but City Ordinance 2011-9 does address that ability.

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

Effluent limitations: Resample; NOV, Fine, Permit Revocation

Late reports: Phone Call, Letter

Unpermitted discharges: Phone Call, Letter, NOV, Fine

Slug loads or spills: Phone Call, Letter, NOV, Fine, Permit Revocation

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:
<b>None</b>			

5. Comments on the POTW's enforcement procedures:

**See comments in #1 above.**

---

---

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?  
program? **Yes**

---

G. MULTI JURISDICTIONAL 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:

**N/A**

---

---

**IU SITE VISIT FORM**

Name of Industry: **Eaton Hydraulics, Inc.**

POTW Name: **City of Searcy**

Industry Contacts: **Kenneth Walker, EHS Technician**

Date and Time of Visit: **2/5/2019 @ 09:32 to 10:10**

Description of Manufacturing Process:

**Metal Finishing: Nickel plating, hot blacking, parts cleaning, cold blacking, painting, and machining cast iron, steel, brass, and aluminum.**

Sources of Process Wastewater:

**Process water from metal finishing activities. All production areas are in a pit so if or when spills occur the fluids are contained and routed to the treatment system. If any line(s) is plugged and unable to be routed routed to the treatment system all influent water flow to the production area stops. Other areas of the facility have berms or ramps that do not allow fluids to escape the area.**

Categorical Industry? **Yes**

Basis for Limits: **40 CFR 433**

Point of Application: **Pretreatment Facility**

Description of Pretreatment Equipment and Procedures:

**Wastewater from mop sumps from the production area goes into a 4,000 gallon tank where an oil skimmer removes any excess oil. Plating process wastewater is collected directly into a 6,000 gallon tank. Sulfuric acid, hydrochloric acid, lime, and caustic soda are used to adjust pH levels through the treatment process. PH is lowered to about 2.5 at Reaction Stage 1 and then to about 10.5 in Reaction Stage 2. Solids/sludge are pressed and disposed of at a landfill in Tulsa, Oklahoma. The pH at final treatment during the visit was 8.3 and the temperature was 79.2°F.**

Spill Prevention and Solvent Management Procedures:

**The facility production area and treatment systems are located within pit areas and spills are diverted to the treatment system. The facility does have a spill response plan and spill kits on site.**

---

Sampling Location and Equipment:

**A composite sampler is set next to the "Sampling Port" tank. Grab samples are collected directly from the tank by the SIU's contract lab. The POTW collects their grab sample from the composite sampler prior to setting the sampler to collect the 24 hour composite. The sampling are was clean but no equipment was inspected at the time of the visit.**

---

**IU SITE VISIT FORM**

Name of Industry: **Cintas Laundry**

POTW Name: **City of Searcy**

Industry Contacts: **Jason Gibson, Maintenance Supervisor**

Date and Time of Visit: **2/5/2019 @ 10:28 to 10:51**

Description of Manufacturing Process:

**Washing of uniforms, floor mats, and other laundry using bleach and washing detergents.**

Sources of Process Wastewater:

**Wastewater generated from wash and rinse cycles of 8 industrial size washers using detergents and bleach.**

Categorical Industry? **No**

Basis for Limits: **Local Limits**

Point of Application: **Treatment area**

Description of Pretreatment Equipment and Procedures:

**Solids (i.e. lint) is removed in a shaker tank and filter buckets.**

**Wastewater contains bleach so sulfuric acid is used to adjust the pH levels prior to discharge to the POTW.**

Spill Prevention and Solvent Management Procedures:

**All areas that contained 55-gallon drums of bleach are set onto secondary containment tubs.**

Sampling Location and Equipment:

**Sampling location was easily accessible. There is a pH meter that monitors pH prior to pH adjustment and one that monitors pH as it discharges to the POTW. Both meters are calibrated weekly. The pH prior to adjustment was 12.33 and after adjustment was 8.42 at the time of the visit.**

**PPETS CODE SHEET**

		CODE
INSPECTOR'S NAME:	<u>Jason Bolenbaugh (Lead), Keith Waters</u>	
NAME OF FACILITY:	<u>City of Searcy</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021601</u>	NPID
DATE OF PCI:	<u>2/4/2019 - 2/5/2019</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>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>Permit</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</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