

September 6, 2019

Steve Dufresne
Van Buren Municipal Utilities
PO Drawer 1269
Van Buren, AR 72956

RE: Van Buren Main - Pretreatment Inspections (Crawford Co)
AFIN: 17-00062 NPDES Permit No.: AR0021482

Dear Mr. Dufresne:

On August 14, 2019, I performed a Pretreatment Compliance Inspection and Industrial User Inspections 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 each of the inspection reports is enclosed for your records.

Please refer to the “Summary of Findings” section of each of the attached inspection reports and provide a written response for each violation 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. 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 **September 20, 2019**.

Please contact Kerri McCabe at mccabe@adeq.state.ar.us or (501) 682-0642 for any additional assistance.

Sincerely,



Dannielle Gray
District 4 Field Inspector
Water Division

CC: James Dunn, Chief Plant Operator, james@vmbu.arcoxml.com
Kim Redo, Pretreatment Coordinator, kim@vmbu.arcoxml.com

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: 17-00062	PERMIT #: AR0021482	DATE: 8/14/2019
COUNTY: 17 Crawford	PDS #: 109237	MEDIA: WN
GPS LAT: 35.418936 LONG: -94.338544 LOCATION: Entrance		

FACILITY INFORMATION	INSPECTION INFORMATION
<small>NAME:</small> Van Buren Main - Pretreatment <small>LOCATION:</small> 1401 Port Road <small>CITY:</small> Van Buren	<small>FACILITY TYPE:</small> 1 - Municipal <small>INSPECTOR ID#:</small> 71330 S - State <small>FACILITY EVALUATION RATING:</small> 3 - Satisfactory <small>INSPECTION TYPE:</small> Pretreatment Compliance <small>DATE(S):</small> <small>ENTRY TIME:</small> <small>EXIT TIME:</small> <small>PERMIT EFFECTIVE DATE:</small> 8/14/2019 08:00 16:30 1/1/2015 <small>PERMIT EXPIRATION DATE:</small> 12/31/2019
RESPONSIBLE OFFICIAL	
<small>NAME / TITLE</small> Steve Dufresne / <small>COMPANY:</small> Van Buren Municipal Utilities <small>MAILING ADDRESS:</small> PO Drawer 1269 <small>CITY, STATE, ZIP:</small> Van Buren AR 72956 <small>PHONE & EXT: / FAX:</small> 479-474-5067 / <small>EMAIL:</small> steve@vbmua.arcoxml.com <small>CONTACTED DURING INSPECTION:</small> No	<small>FAYETTEVILLE SHALE RELATED:</small> N <small>FAYETTEVILLE SHALE VIOLATIONS:</small> N <div style="background-color: #e0e0e0; text-align: center; padding: 2px;">INSPECTION PARTICIPANTS</div> <small>NAME/TITLE/PHONE/FAX/EMAIL/ETC.:</small> James Dunn/Chief Plant Operator/479.474.5067/james@vbmua.arcoxml.com Kim Redo/Environmental Coordinator/479.474.0941/kim@vbmua.arcoxml.com

AREA EVALUATIONS					
<small>(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)</small>					
S	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
S	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

The following violations were noted during inspection:

1. The industrial user survey has not been conducted in a timely manner. This is a violation of Part II, Condition 7.a.(1) of the permit. Specifically, the facility's pretreatment program requires that a user survey be completed every 36 months. The most recent survey was completed in January 2015.


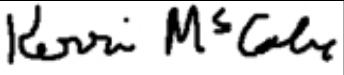
2. An error was noted on the 2017/2018 annual report. The report submitted indicated that the facility issued a total of 18 NOVs to four entities. Records audit revealed that the facility issued a total of 25 NOVs to five entities. This is a violation of Part II, Condition 7.d.2.(e) of the permit. A correction must be submitted to the facility's Enforcement Analysis with a copy of the correction submitted in response to this inspection report.

GENERAL COMMENTS

I inspected this facility on August 14, 2019 with the above-referenced inspection participants. Inspection consisted of a pretreatment program review and site visits to three of the nine industrial users permitted to discharge to the POTW.

The city's Pretreatment Program was originally approved on October 1, 1981. Modifications to the program were approved March 21, 1990; March 6, 1997; and March 18, 2011 in order to comply with revisions to the Pretreatment Regulations.

There are nine Significant Industrial Users (SIUs) that are permitted for discharge into the Main Plant POTW, four of which are classified as Categorical Industrial Users (CIUs). Industrial contributions from these IUs constitute approximately 34% of the POTW's average flow of 2.55 MGD. See attached checklists for additional information.

INSPECTOR'S SIGNATURE:  Dannielle Gray	DATE: 8/23/2019
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 9/5/2019

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

 Name of Municipality: City of Van Buren POTW (Main/South Plant)

 AFIN Number: 17-00062

 NPDES Permit Number(s): AR0021482, ARR000413

 Program Tracked under NPDES Permit Number: AR0021482

 Fact Sheet Preparation Date: November 2003

 Date of Last PCI/Audit: Last PCI – June 11-12, 2013
Last Audit – November 15-17, 2016

 Date of Last Annual Report: October 22, 2018

 Name of Inspector: Dannielle Gray

 Date PCI Performed: August 14, 2019

 Name, Title, and Telephone Number of Facility Representative:
Kim Redo, Pretreatment/Environmental Coordinator, 479-474-0941
James Dunn, Chief Plant Operator, 479-474-5067

 Name and Title of Other Participants: _____
None

 Number of IUs Visited: 3

 Name(s) of IUs Visited: Tate & Lyle, River City Coatings, B&W
Plating

 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. None

2. Has ADEQ or EPA been notified of these changes? N/A

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? survey completed January 2015. Pretreatment program states that surveys will be conducted every 36 months.** No – last

4. What procedures are being used to update the IU Survey? **Industrial user survey form is sent every three years to industries and businesses. Follow-up phone calls are made to facilities as needed.**

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) 9

6. Number of Categorical Industrial Users: 4

7. How does the POTW determine the appropriate categorical standards to apply to an IU? 40 CFR 433 and SIC Code book

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:
River City Coating	Metal Finishing	Phosphating & Electrostatic painting
Arkansas Lamp Mfg.	Metal Finishing	Phosphating & Electrostatic painting
B&H Plating	Metal Finishing	Phosphating & Electrostatic painting
Fab Tech	Metal Finishing	Phosphating & Electrostatic painting

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. **None**

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 Permit:	Program:	Comments:
Metals:				
Influent:	<u>4/yr.</u>	<u>4/yr.</u>	<u>4/yr.</u>	<u>Table III</u>
Effluent:	<u>4/yr.</u>	<u>4/yr.</u>	<u>4/yr.</u>	<u>Table III</u>
Sludge:	<u>1 (when removed)</u>	<u>1/qtr.</u>	<u>1/qtr.</u>	<u>Table III</u>
Organics:				
Influent:	<u>1/yr.</u>	<u>1/yr.</u>	<u>1/yr.</u>	<u>Table II</u>
Effluent:	<u>1/yr.</u>	<u>1/yr.</u>	<u>1/yr.</u>	<u>Table II</u>
Sludge:	<u>1 (when removed)</u>	<u>1/yr.</u>	<u>1/yr.</u>	<u>Table II</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?

None

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes

2. How many IU permits (or other control documents) have been issued? 9 permits

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

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

Non-transferability: 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>2/yr.</u>	<u>2/yr.</u>
	other SIUs	<u>2/yr.</u>	<u>2/yr.</u>
	Inspection:		
	categorical IUs	<u>1/yr.</u>	<u>1/yr.</u>
	other SIUs	<u>1/yr.</u>	<u>1/yr.</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes - B&W is due for 2019. All other IUs have been inspected in 2019.

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: 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).**
Yes

-
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 (IUs are not all submitting their COCs to the POTW, but the POTW is keeping COCs for their sampling activity).
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? Check sheets are kept manually. When reports are received, data are transferred to these manual check sheets and compared/reviewed for compliance verification.
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?** Verbal inquiry & NOV and/or monetary penalty as necessary.
-

17. What are the POTW's procedures for following up violations?
The IU is issued an approved enforcement response plan with provisions for both formal and informal action. Type of action is dependent on type of 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:

Name and address: Yes

Other environmental permits held: Yes

Description of operations: Yes

Process flow diagrams: Yes

Flow measurements: Yes

Measurements of regulated pollutants: Yes

Certification of compliance by the IU: Yes

Compliance schedule (if needed): Yes

19. Additional comments on the POTW's inspection and sampling procedures:
Industrial Users are not all submitting COCs with their sample results as required.

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, administrative penalty; monitoring/sampling by city

Late reports: Verbal NOV; written NOV as needed

Unpermitted discharges: Handled as criminal offense through city ordinance

Slug loads or spills: NOV; monetary penalty

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 - last publication in the October 24, 2018 issue of the Press Argus-Courier

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:
Simmons Poultry Farms	BOD excursions	NOVs; monetary penalty	Out of compliance Sept 2018 to April 2019; came into compliance May 2019
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:
According to the 2017/2018 annual report, the facility issued
a total of 18 NOVs to four separate non-categorical IUs for
limit excursions and assessed a total of \$30,819.95 in
penalties. During inspection, it was revealed that this is an
error. The facility issued 25 NOVs to five separate entities
during the monitoring period 2017/2018.

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: N/A

H. EVALUATION AND COMMENTS

The program coordinator is well-versed in the program and in the management of industrial user discharge to the treatment plant. The industrial user survey was due to be sent out in January 2019 and must be initiated promptly.

An error was noted on the annual report (see E.5 above for details).

Overall, the pretreatment program meets the requirements of the permit and is effectively reducing impact on the Van Buren Main wastewater treatment plant. Records were easily accessible and well-organized and staff was familiar with the contents of the program and each issued IU permit.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Tate & Lyle

POTW Name: Van Buren Main Wastewater Treatment Plant

Industry Contacts: Erik Boggs/Production Manager/479-410-6011
Bobby Campbell/EHS Manager/479-410-6102
Jeff Howell/Plant Manager/479-410-6019

Date and Time of Visit: August 14, 2019; 1115 am

Description of Manufacturing Process:
Manufacturer of modified food starches. Slurry tank to drying to packaging.

Sources of Process Wastewater:
Production line with wash down water, blow down/condensate & cooling tower water

Categorical Industry? No

Basis for Limits: Modified TBLLs

Point of Application: _____

Description of Pretreatment Equipment and Procedures:
Wastewater sent to surge tank, where it is monitored for pH, temp, COD, & residual solvent. From there, it flows to the activated sludge package plant. Pretreated wastewater is then sent to the POTW. Sludge is hauled and land applied by a licensed contractor.

Spill Prevention and Solvent Management Procedures:
All floor drains in the process area flow to the pretreatment plant. Distillation tank area flows to the pretreatment plant when ethanol is present. All chemicals are self-contained, labeled, and stored properly.

Sampling Location and Equipment:
Shed near entrance gate contains fixed composite sampler, refrigerated holding, and sample well with Palmer-Bowlus flume.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: B&W Plating Company

POTW Name: Van Buren Main Wastewater Treatment Plant

Industry Contacts: Aaron Toth/Plating Manager/479-646-7815 ext. 207

Date and Time of Visit: August 14, 2019; 1030 am

Description of Manufacturing Process:
Nickel, tin, and lead electroplating

Sources of Process Wastewater:
No discharge; sewer has been capped and removed at this facility due to excessive non-compliance issues.

Categorical Industry? Yes

Basis for Limits: 40 CFR Part 433

Point of Application: _____

Description of Pretreatment Equipment and Procedures:
Process waters > equalization tank (pH adjustment and flow equalization) > reaction tank (metal precipitation & coagulation) > floc mixing tank (coagulant added) > clarifier > sludge holding tank > sludge filter press > evaporator (no discharge); sludges are hauled offsite as hazardous waste by EQ Services in Tulsa, Oklahoma.

Spill Prevention and Solvent Management Procedures:
Spill kits onsite. Any spill and contaminated spill clean-up materials are hauled off by licensed waste haulers. Acid spills are neutralized with caustic and then sent to the evaporator.

Sampling Location and Equipment:
None – no discharge/no sewer

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: River City Coatings, Inc.

POTW Name: Van Buren Main Wastewater Treatment Plant

Industry Contacts: Tony Jester/Plant Manager/479-471-7675

Date and Time of Visit: August 14, 2019; 1200 pm

Description of Manufacturing Process:

Metal washing through a 5-stage wash system that includes an alkali bath (Tank #1), rinse (Tank #2), iron phosphate bath (Tank #3), rinse (Tank #4), and sealant stages (Tank #5).

Sources of Process Wastewater:

Rinse tanks – Tanks 2 and 4

Categorical Industry? Yes

Basis for Limits: 40 CFR Part 433

Point of Application: _____

Description of Pretreatment Equipment and Procedures:

The facility does not have pretreatment equipment. Rinse waters are discharged directly to the POTW.

Spill Prevention and Solvent Management Procedures:

Lockdown/shut-off valve manually in the sampling box. Sand bags and absorbents for spills. Contract with Safety Kleen for clean-up.

Sampling Location and Equipment:

Clean-out behind the shop on the southwest corner of the building; concrete wet well allows for sample collection. No fixed sampling equipment. Flow is measured based on water meter flow.

PPETS CODE SHEET
 PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Danielle Gray</u>	
NAME OF FACILITY:	<u>City of Van Buren – Main WWTP</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021482</u>	NPID
DATE OF PCI:	<u>August 14, 2019</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>9</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>4</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>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

Figure 1. Google Earth image (not dated) showing treatment plant overview and outfall location.

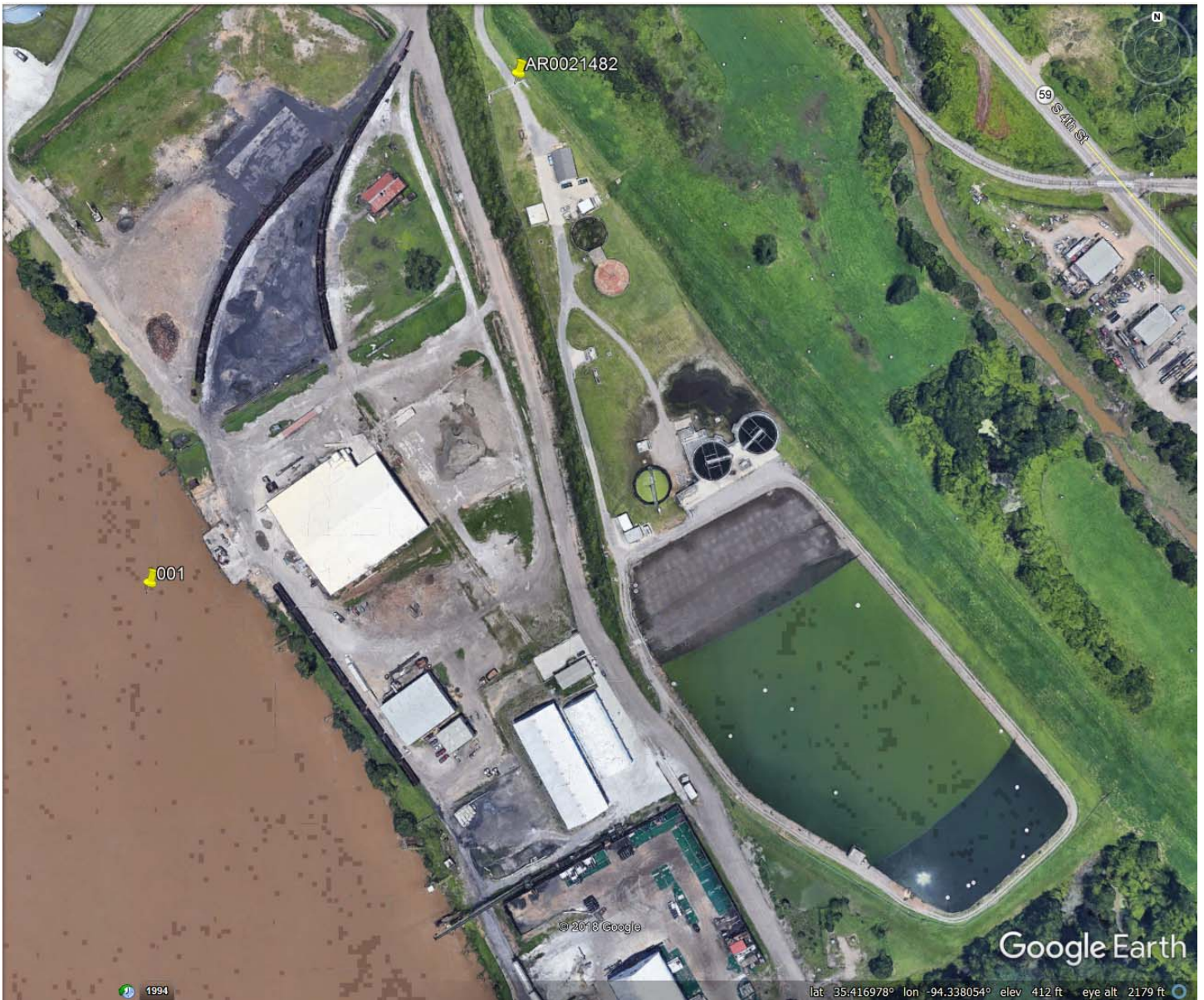


Figure 2. Google Earth image (not dated) showing locations of IUs inspected in relation to treatment plant.



ADEQ

ARKANSAS
Department of Environmental Quality

CERTIFIED MAIL: 9489 0090 0027 6060 6329 73

February 18, 2020

Steve Dufresne
Van Buren Municipal Utilities
PO Drawer 1269
Van Buren, AR 72956

RE: Van Buren Main Pretreatment – Failure to Respond (Crawford Co)
AFIN: 17-00062 NPDES Permit No.: AR0021482

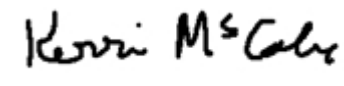
Dear Mr. Dufresne:

A letter dated September 6, 2019 was sent by ADEQ to Van Buren Municipal Utilities. The letter outlined the findings of Inspector Dannielle Gray's my August 14, 2019 Pretreatment Compliance Inspection of the above-referenced facility. The letter requested that a written response be submitted to the Office of Water Quality Compliance Branch of this Department by September 20, 2019. To date, no response has been received.

Please submit a written response by **March 3, 2020**. A copy of the inspection report has been included for your convenience.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (501) 682-0642 or you may e-mail me at mccabe@adeq.state.ar.us.

Sincerely,



Kerri McCabe, Inspector Supervisor
Compliance Branch
Office of Water Quality
ADEE - DEQ

From: [McCabe, Kerri](#)
To: [McConnell, Melissa](#)
Subject: FW: response to 2019 ADEQ Inspection Main plant (Van Buren)
Date: Thursday, February 27, 2020 7:11:53 AM
Attachments: [image001.png](#)

Melissa,

Please attach this email and attachments to PDS 109237. It looks like the response went to Permits Branch and they lumped it into "Permit Info" under PDS. Thank you.

Kerri McCabe | Inspector Supervisor
**Division of Environmental Quality | Office of Water Quality
Compliance Branch**
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0642 | c: 501.352.5641 | e: mccabe@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: Kim Redo [<mailto:kim@vbmu.org>]
Sent: Wednesday, February 26, 2020 2:04 PM
To: McCabe, Kerri; Gray, Dannielle
Cc: Steve Dufresne; James Dunn
Subject: response to 2019 ADEQ Inspection Main plant (Van Buren)

Copies of all sent response pages attached

Kim Redo
Environmental Coordinator
Van Buren Municipal Utilities
1401 Port Road
Van Buren, AR 72956
(479) 474-0941

Commission:
Jim Williamson
Todd Young
J.W. Floyd
Keith Hefner
Chad Adams



"Providing Water, Sewer, and Sanitation Services"

2806 Bryan Road / P.O. Drawer 1269

Van Buren, Arkansas 72957

479-474-5067 / Fax 479-471-8969

City of Van Buren Municipal Utilities

Engineer
Larry Weir
Attorney
M. Sean Brister
Secretary
Kathy Geppert

October 3, 2019

Arkansas Department of Environmental Quality
Office of Water Quality, Compliance Branch
5301 Northshore Drive
North Little Rock, Arkansas 72118

**Re: City of Van Buren Municipal Utilities (VBMU) Main WWTP –
August 14, 2019 Pretreatment Inspection Report Response
Permit Number AR0021482**

AFIN: 17-0000062

Dear Sirs:

In response to the Summary of Findings section of the above named Pretreatment Inspection:

1. The industrial user survey has not been conducted in a timely manner.

This was due to an oversight of VBMU Administration, Management, and Staff. The industrial user survey was mailed during September 2019. We will schedule to insure that it is completed on schedule as required in the future.

2. An error was noted on the 2017/2018 annual report.

Please find the attached corrected report.

If you have questions or need further information, please contact me at the above telephone number or via email at steve@vbmu.org or VBMU Pretreatment/Environmental Coordinator Kim Redo at 479-474-0941 or via email at kim@vbmu.org.

Sincerely,

A handwritten signature in blue ink that reads "Steve Dufresne".

Steve Dufresne
Director of Utilities

cc: file

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: 17-00062 | PERMIT #: AR0021482 | DATE: 8/14/2019
 COUNTY: 17 Crawford | PDS #: 109237 | MEDIA: WN
 GPS LAT: 35.418936 LONG: -94.338544 LOCATION: Entrance

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: Van Buren Main - Pretreatment LOCATION: 1401 Port Road CITY: Van Buren	FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 71330 S - State FACILITY EVALUATION RATING: 3 - Satisfactory INSPECTION TYPE: Pretreatment Compliance DATE(S): 8/14/2019 ENTRY TIME: 08:00 EXIT TIME: 16:30 PERMIT EFFECTIVE DATE: 1/1/2015 PERMIT EXPIRATION DATE: 12/31/2019
RESPONSIBLE OFFICIAL	
NAME / TITLE: Steve Dufresne / COMPANY: Van Buren Municipal Utilities MAILING ADDRESS: PO Drawer 1269 CITY, STATE, ZIP: Van Buren AR 72956 PHONE & EXT. / FAX: 479-474-5067 / EMAIL: steve@vbm.arcoxml.com	FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N INSPECTION PARTICIPANTS NAME/TITLE/PHONE/FAX/EMAIL/ETC.: James Dunn/Chief Plant Operator/479.474.5067/james@vbm.arcoxml.com Kim Redo/Environmental Coordinator/479.474.0941/kim@vbm.arcoxml.com
CONTACTED DURING INSPECTION: No	

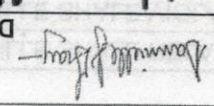
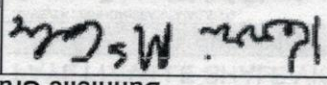
AREA EVALUATIONS					
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
S	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
S	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

The following violations were noted during inspection:

1. The industrial user survey has not been conducted in a timely manner. This is a violation of Part II, Condition 7.a.(1) of the permit. Specifically, the facility's pretreatment program requires that a user survey be completed every 36 months. The most recent survey was completed in January 2015.
2. An error was noted on the 2017/2018 annual report. The report submitted indicated that the facility issued a total of 18 NOVs to four entities. Records audit revealed that the facility issued a total of 25 NOVs to five entities. This is a violation of Part II, Condition 7.d.2.(e) of the permit. A correction must be submitted to the facility's Enforcement Analysis with a copy of the correction submitted in response to this inspection report.

11/15/2019 10:58 AM
 11/15/2019 10:58 AM
 11/15/2019 10:58 AM

<p>GENERAL COMMENTS</p> <p>I inspected this facility on August 14, 2019 with the above-referenced inspection participants. Inspection consisted of a pretreatment program review and site visits to three of the nine industrial users permitted to discharge to the POTW.</p> <p>The city's Pretreatment Program was originally approved on October 1, 1981. Modifications to the program were approved March 21, 1990; March 6, 1997; and March 18, 2011 in order to comply with revisions to the Pretreatment Regulations.</p> <p>There are nine Significant Industrial Users (SIUs) that are permitted for discharge into the Main Plant POTW, four of which are classified as Categorical Industrial Users (CIUs). Industrial contributions from these IUs constitute approximately 34% of the POTW's average flow of 2.55 MGD. See attached checklists for additional information.</p>	
<p>INSPECTOR'S SIGNATURE:</p> 	<p>DATE: 8/23/2019</p>
<p>SUPERVISOR'S SIGNATURE:</p> 	<p>DATE: 9/5/2019</p>

Commission:
Jim Williamson
Todd Young
J.W. Floyd
Keith Hefner
Chad Adams



"Providing Water, Sewer, and Sanitation Services"

2806 Bryan Road / P.O. Drawer 1269

Van Buren, Arkansas 72957

479-474-5067 / Fax 479-471-8969

City of Van Buren Municipal Utilities

Engineer
Larry Weir
Attorney
M. Sean Brister
Secretary
Kathy Geppert

October 3, 2019

Arkansas Department of Environmental Quality
Office of Water Quality, Compliance Branch
5301 Northshore Drive
North Little Rock, Arkansas 72118

**Re: City of Van Buren Municipal Utilities (VBMU) Main WWTP –
August 14, 2019 Pretreatment Inspection Report Response
Permit Number AR0021482**

AFIN: 17-0000062

Dear Sirs:

In response to the Summary of Findings section of the above named Pretreatment Inspection:

1. The industrial user survey has not been conducted in a timely manner.

This was due to an oversight of VBMU Administration, Management, and Staff. The industrial user survey was mailed during September 2019. We will schedule to insure that it is completed on schedule as required in the future.

2. An error was noted on the 2017/2018 annual report.

Please find the attached corrected report.

If you have questions or need further information, please contact me at the above telephone number or via email at steve@vbmu.org or VBMU Pretreatment/Environmental Coordinator Kim Redo at 479-474-0941 or via email at kim@vbmu.org.

Sincerely,

A handwritten signature in blue ink that reads "Steve Dufresne".

Steve Dufresne
Director of Utilities

cc: file

ARKANSAS

ENERGY & ENVIRONMENT

ENVIRONMENTAL QUALITY

September 6, 2019

Steve Dufresne
Van Buren Municipal Utilities
PO Drawer 1269
Van Buren, AR 72956

RE: Van Buren Main - Pretreatment Inspections (Crawford Co)
AFIN: 17-00062 NPDES Permit No.: AR0021482

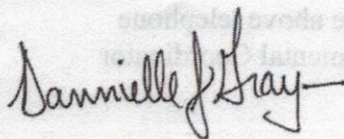
Dear Mr. Dufresne:

On August 14, 2019, I performed a Pretreatment Compliance Inspection and Industrial User Inspections 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 each of the inspection reports is enclosed for your records.

Please refer to the "Summary of Findings" section of each of the attached inspection reports and provide a written response for each violation 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. 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 **September 20, 2019**.

Please contact Kerri McCabe at mccabe@adeq.state.ar.us or (501) 682-0642 for any additional assistance.

Sincerely,



Dannielle Gray
District 4 Field Inspector
Water Division

CC: James Dunn, Chief Plant Operator, james@vmbu.arcoxml.com
Kim Redo, Pretreatment Coordinator, kim@vmbu.arcoxml.com

Division of Environmental Quality

5301 Northshore Drive, North Little Rock, AR 72118-5137
adeq.state.ar.us

4)	No. of Facilities Inspected (nonsampling).....	<u>4/4</u>	<u>5/5</u>
5)	No. of Facilities Sampled.....	<u>4</u>	<u>5</u>

Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>	
1)	No. of Compliance Schedules Issued/No. of Schedules Required.....	<u>0/0</u>	<u>0/0</u>
2)	No. of Notices of Violations Issued to SIUs.....	<u>0/4</u>	<u>25/4</u>
3)	No. of Administrative Orders Issued to SIUs.....	<u>0</u>	<u>0</u>
4)	No. of Civil Suits Filed.....	<u>0</u>	<u>0</u>
5)	No. of Criminal Suits Filed.....	<u>0</u>	<u>0</u>
6)	No. of Significant Violators (newspaper publication attached).....	<u>0</u>	<u>0</u>
7)	Amount of Penalties Collected (total dollars/ IUs Assessed) (Not Surcharges).....	<u>\$0</u>	<u>\$30,819.95/5</u>
8)	Other Actions (sewer bans, etc.).....	<u>0</u>	<u>0</u>

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.

Authorized Representative

Steve Dufresne

Date

10/3/2019

**STEVE DUFRESNE
DIRECTOR OF UTILITIES**

CORRECTED COPY

SIGNIFICANT VIOLATORS -- ENFORCEMENT ACTIONS TAKEN
ATTACHMENT B

CORRECTED COPY

INDUSTRIAL USER	Nature of Violation		NUMBER OF ACTIONS TAKEN						COMPLIANCE SCHEDULE			
	REPORTS	LIMITS	N.O.V.	A.O.	CIVIL	CRIMINAL	OTHER	PENALTIES COLLECTED	DATE ISSUED	DATE DUE	CURRENT STATUS	COMMENTS
Simmons Foods		28X	12	0	0	0	0	yes	n/a	n/a	NC	25 BOD & 3 TSS excursions
Simmons Prepared Foods		19X	6	0	0	0	0	yes	n/a	n/a	NC	19 BOD excursions
Tate & Lyle		2X	2	0	0	0	0	yes	n/a	n/a	C	2 BOD excursions
Tyson Foods		3X	3	0	0	0	0	yes	n/a	n/a	C	3 TSS excursions
Arkansas Valley Truck Wash		2X	2	0	0	0	0	no	n/a	n/a	C	2 BOD excursions

From: [McCabe, Kerri](#)
To: [McConnell, Melissa](#)
Subject: FW: response to 2019 ADEQ Inspection Main plant (Van Buren)
Date: Thursday, February 27, 2020 7:12:59 AM
Attachments: [VBMU_PT_INSPECTION_AFIN_17-0000062.pdf](#)
[image002.png](#)

Melissa,

Please add this email and attachment to PDS 109237 as well. Thank you.

Kerri McCabe | Inspector Supervisor
Division of Environmental Quality | Office of Water Quality
Compliance Branch
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0642 | c: 501.352.5641 | e: mccabe@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: Steve Dufresne [mailto:steve@vbm.org]
Sent: Wednesday, February 26, 2020 2:32 PM
To: Kim Redo; McCabe, Kerri; Gray, Dannielle
Cc: James Dunn
Subject: RE: response to 2019 ADEQ Inspection Main plant (Van Buren)

Kim I found a copy in the Office Pretreatment Program file as well – PDF attached.

Steve Dufresne
Director of Utilities
City of Van Buren Municipal Utilities
(479)474-5067
vbm.org



From: Kim Redo
Sent: Wednesday, February 26, 2020 2:04 PM
To: McCabe, Kerri <MCCABE@adeq.state.ar.us>; Gray, Dannielle <dannielle.gray@adeq.state.ar.us>
Cc: Steve Dufresne <steve@vbm.org>; James Dunn <james@vbm.org>
Subject: response to 2019 ADEQ Inspection Main plant (Van Buren)

Copies of all sent response pages attached

Kim Redo

Environmental Coordinator
Van Buren Municipal Utilities
1401 Port Road
Van Buren, AR 72956
(479) 474-0941

Commission:
Jim Williamson
Todd Young
J.W. Floyd
Keith Hefner
Chad Adams



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2806 Bryan Road / P.O. Drawer 1269

Van Buren, Arkansas 72957

479-474-5067 / Fax 479-471-8969

City of Van Buren Municipal Utilities

Engineer
Larry Weir
Attorney
M. Sean Brister
Secretary
Kathy Geppert

October 3, 2019

Arkansas Department of Environmental Quality
Office of Water Quality, Compliance Branch
5301 Northshore Drive
North Little Rock, Arkansas 72118

**Re: City of Van Buren Municipal Utilities (VBMU) Main WWTP –
August 14, 2019 Pretreatment Inspection Report Response
Permit Number AR0021482**

AFIN: 17-0000062

Dear Sirs:

In response to the Summary of Findings section of the above named Pretreatment Inspection:

1. ***The industrial user survey has not been conducted in a timely manner.***

This was due to an oversight of VBMU Administration, Management, and Staff. The industrial user survey was mailed during September 2019. We will schedule to insure that it is completed on schedule as required in the future.

2. ***An error was noted on the 2017/2018 annual report.***

Please find the attached corrected report.

If you have questions or need further information, please contact me at the above telephone number or via email at steve@vbmu.org or VBMU Pretreatment/Environmental Coordinator Kim Redo at 479-474-0941 or via email at kim@vbmu.org.

Sincerely,

A handwritten signature in blue ink that reads "Steve Dufresne". The signature is stylized with a long, sweeping underline.

Steve Dufresne
Director of Utilities

cc: file

Serving Van Buren since 1893

September 6, 2019

Steve Dufresne
Van Buren Municipal Utilities
PO Drawer 1269
Van Buren, AR 72956

RE: Van Buren Main - Pretreatment Inspections (Crawford Co)
AFIN: 17-00062 NPDES Permit No.: AR0021482

Dear Mr. Dufresne:

On August 14, 2019, I performed a Pretreatment Compliance Inspection and Industrial User Inspections 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 each of the inspection reports is enclosed for your records.

Please refer to the "Summary of Findings" section of each of the attached inspection reports and provide a written response for each violation 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. 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 **September 20, 2019**.

Please contact Kerri McCabe at mccabe@adeq.state.ar.us or (501) 682-0642 for any additional assistance.

Sincerely,



Dannielle Gray
District 4 Field Inspector
Water Division

CC: James Dunn, Chief Plant Operator, james@vmbu.arcoxml.com
Kim Redo, Pretreatment Coordinator, kim@vmbu.arcoxml.com

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: 17-00062 PERMIT #: AR0021482 DATE: 8/14/2019
 COUNTY: 17 Crawford PDS #: 109237 MEDIA: WN
 GPS LAT: 35.418936 LONG: -94.338544 LOCATION: Entrance

FACILITY INFORMATION

NAME:
Van Buren Main - Pretreatment
 LOCATION:
1401 Port Road
 CITY:
Van Buren

RESPONSIBLE OFFICIAL

NAME: / TITLE
Steve Dufresne /
 COMPANY:
Van Buren Municipal Utilities
 MAILING ADDRESS:
PO Drawer 1269
 CITY, STATE, ZIP:
Van Buren AR 72956
 PHONE & EXT: / FAX:
479-474-5067 /
 EMAIL:
steve@vbm.arcoxml.com
 CONTACTED DURING INSPECTION: No

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal** INSPECTOR ID#: **71330 S - State**
 FACILITY EVALUATION RATING: **3 - Satisfactory** INSPECTION TYPE: **Pretreatment Compliance**
 DATE(S): **8/14/2019** ENTRY TIME: **08:00** EXIT TIME: **16:30** PERMIT EFFECTIVE DATE: **1/1/2015**
 PERMIT EXPIRATION DATE: **12/31/2019**

FAYETTEVILLE SHALE RELATED: N

FAYETTEVILLE SHALE VIOLATIONS: N

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
James Dunn/Chief Plant
Operator/479.474.5067/james@vbm.arcoxml.com
Kim Redo/Environmental
Coordinator/479.474.0941/kim@vbm.arcoxml.com

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

S	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
S	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

The following violations were noted during inspection:

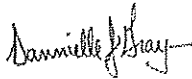
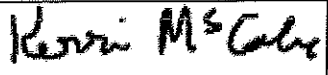
1. The industrial user survey has not been conducted in a timely manner. This is a violation of Part II, Condition 7.a.(1) of the permit. Specifically, the facility's pretreatment program requires that a user survey be completed every 36 months. The most recent survey was completed in January 2015.
2. An error was noted on the 2017/2018 annual report. The report submitted indicated that the facility issued a total of 18 NOVs to four entities. Records audit revealed that the facility issued a total of 25 NOVs to five entities. This is a violation of Part II, Condition 7.d.2.(e) of the permit. A correction must be submitted to the facility's Enforcement Analysis with a copy of the correction submitted in response to this inspection report.

GENERAL COMMENTS

I inspected this facility on August 14, 2019 with the above-referenced inspection participants. Inspection consisted of a pretreatment program review and site visits to three of the nine industrial users permitted to discharge to the POTW.

The city's Pretreatment Program was originally approved on October 1, 1981. Modifications to the program were approved March 21, 1990; March 6, 1997; and March 18, 2011 in order to comply with revisions to the Pretreatment Regulations.

There are nine Significant Industrial Users (SIUs) that are permitted for discharge into the Main Plant POTW, four of which are classified as Categorical Industrial Users (CIUs). Industrial contributions from these IUs constitute approximately 34% of the POTW's average flow of 2.55 MGD. See attached checklists for additional information.

INSPECTOR'S SIGNATURE:  Dannielle Gray	DATE: 8/23/2019
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 9/5/2019

4)	No. of Facilities Inspected (nonsampling).....	<u>4/4</u>	<u>5/5</u>
5)	No. of Facilities Sampled.....	<u>4</u>	<u>5</u>

Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>
1)	No. of Compliance Schedules Issued/No. of Schedules Required.....	<u>0/0</u> <u>0/0</u>
2)	No. of Notices of Violations Issued to SIUs.....	<u>0/4</u> <u>25/4</u>
3)	No. of Administrative Orders Issued to SIUs.....	<u>0</u> <u>0</u>
4)	No. of Civil Suits Filed.....	<u>0</u> <u>0</u>
5)	No. of Criminal Suits Filed.....	<u>0</u> <u>0</u>
6)	No. of Significant Violators (newspaper publication attached).....	<u>0</u> <u>0</u>
7)	Amount of Penalties Collected (total dollars/ IUs Assessed) (Not Surcharges).....	<u>\$0</u> <u>\$30,819.95/5</u>
8)	Other Actions (sewer bans, etc.).....	<u>0</u> <u>0</u>

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.

Authorized Representative Steve Dufresne Date 10/3/2019
STEVE DUFRESNE
DIRECTOR OF UTILITIES

CORRECTED COPY

SIGNIFICANT VIOLATORS -- ENFORCEMENT ACTIONS TAKEN
 ATTACHMENT B

CORRECTED COPY

COMPLIANCE SCHEDULE

NUMBER OF ACTIONS TAKEN

INDUSTRIAL USER	Nature of Violation		NUMBER OF ACTIONS TAKEN						PENALTIES COLLECTED	DATE ISSUED	DATE DUJE	CURRENT STATUS	COMMENTS
	REPORTS	LIMITS	N.O.V.	A.O.	CIVIL	CRIMINAL	OTHER						
Simmons Foods		28X	12	0	0	0	0	0	yes	n/a	n/a	NC	25 BOD & 3 TSS excursions
Simmons Prepared Foods		19X	6	0	0	0	0	0	yes	n/a	n/a	NC	19 BOD excursions
Tate & Lyle		2X	2	0	0	0	0	0	yes	n/a	n/a	C	2 BOD excursions
Tyson Foods		3X	3	0	0	0	0	0	yes	n/a	n/a	C	3 TSS excursions
Arkansas Valley Truck Wash		2X	2	0	0	0	0	0	no	n/a	n/a	C	2 BOD excursions

ADEQ

ARKANSAS
Department of Environmental Quality

March 9, 2020

Steve Dufresne
Van Buren Municipal Utilities
PO Drawer 1269
Van Buren, AR 72956

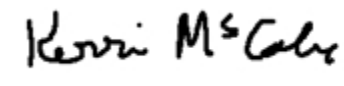
RE: Van Buren Main - Pretreatment – Response to Inspection (Crawford Co)
AFIN: 17-00062 **NPDES Permit No.: AR0021482**

Dear Mr. Dufresne:

I have reviewed the response pertaining to Inspector Dannielle Gray's August 14, 2019 inspection of the Van Buren Municipal Utilities pretreatment program. The information provided sufficiently addresses the violations referenced in the inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (501) 682-0642 or you may e-mail me at mccabe@adeq.state.ar.us.

Sincerely,



Kerri McCabe, Inspector Supervisor
Compliance Branch
Office of Water Quality
ADEE - DEQ