



WATER DIVISION INSPECTION REPORT

ARKANSAS
Department of Environmental Quality

AFIN: 70-00341	PERMIT #: AR0033723	DATE: 8/20/2019
COUNTY: 70 Union	PDS #: 109384	MEDIA: WN
GPS LAT: 33.176916 LONG: -92.574492 LOCATION: Entrance		

FACILITY INFORMATION

NAME:
City of El Dorado - South Plant

LOCATION:
325 Quail Crossing

CITY:
El Dorado, AR 71730

RESPONSIBLE OFFICIAL

NAME / TITLE:
Veronica Smith-Creer / Mayor

COMPANY:
City of El Dorado

MAILING ADDRESS:
P.O. Box 2170

CITY, STATE, ZIP:
El Dorado AR 71730

PHONE & EXT. / FAX:
870-862-7911 /

EMAIL:
mayorsmith-creer@eldoradoar.org

CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE: 1 - Municipal	INSPECTOR ID#: 101531 S - State		
FACILITY EVALUATION RATING: 5 - Satisfactory	INSPECTION TYPE: Pretreatment Compliance		
DATE(S): 8/20/2019	ENTRY TIME: 09:02	EXIT TIME: 13:15	PERMIT EFFECTIVE DATE: 01/01/2015
			PERMIT EXPIRATION DATE: 12/31/2019

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Jay Honeycutt/Pretreatment Coordinator/870-814-1764

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	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	**	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

No violations were noted at the time of the inspection.

GENERAL COMMENTS

On August 20, 2019, I performed a Pretreatment Compliance Inspection (PCI) on the City of El Dorado with the above participants in attendance. This inspection consisted of a program and records review as well as a site visit to two Industrial Users (IU).

Records Review:

City of El Dorado has submitted the pretreatment annual report for the past three years and they were deemed complete. During the records review, I viewed a copy of the pretreatment ordinance and program overview. City of El Dorado administers a pretreatment program that is compliant with 40 CFR 433 and all pretreatment requirements in their permit. City of El Dorado conducts industrial surveys and maintains copies of the surveys. All sampling is conducted by the City of El Dorado, and I reviewed the sampling information as well as the analysis and Chains of Custody (COC) and the records were deemed complete. Batch sampling and discharging is conducted by most of the pretreatment facilities, in which City of El Dorado conducts sampling up to 20 times per year for the batch discharges. Sampling is conducted; and when the analysis is received and the effluent is below the limits set by the pretreatment program, City of El Dorado allows the discharge to the POTW. Only one sampling event conducted in 2018 had exceedances that needed to be addressed. The pretreatment program has six significant users of which four are categorical industries. An additional two facilities are defined as non-significant users and are not categorical industries. All records were deemed complete.

Site Visits:

Site visits were conducted at Miller Transport and Prescolite – Reflector Plant. Miller Transport has not discharged effluent that would meet any conditions for the pretreatment as they have discontinued the practice of cleaning tank interiors. Prescolite – Reflector Plant has an anodizing line for aluminum reflectors and does not have batch sampling. See complete IU site visit reports for details.


INSPECTOR'S SIGNATURE:



Michael Young

DATE: 9/6/2019

SUPERVISOR'S SIGNATURE:



Kerri McCabe

DATE: 9/18/2019

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

Name of Municipality: City of El Dorado

AFIN Number: 70-00341

NPDES Permit Number(s): AR0033723 (South Plant); AR0033936 (North Plant)

Program Tracked under NPDES Permit Number: AR0033723 (South Plant)

Fact Sheet Preparation Date: _____

Date of Last PCI/Audit: June 12, 2014

Date of Last Annual Report: March 1, 2019

Name of Inspector: Michael Young

Date PCI Performed: August 20, 2019

Name, Title, and Telephone Number of Facility Representative:
Jay Honeycutt, Pretreatment Coordinator, 870-862-6451

Name and Title of Other Participants: _____

Number of IUs Visited: 2

Name(s) of IUs Visited: Miller Transports and Prescolite

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. No change. Miller Transport is in the process of discontinuing pretreatment program (see IU visit).

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

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

4. What procedures are being used to update the IU Survey?
Distribute surveys; pay attention to new business and chamber of commerce.

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) 6

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

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:
Prescolite Reflector	Metal Finishing	Anodizing
Milbank Mfg.	Metal Finishing	Phosphatizing
Miller Transport	Transportation Cleaning	Equipment Cleaning
Duckwater Services	Transportation Cleaning	Equipment Cleaning

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/year</u>	<u>4/year</u>	<u>Quarterly</u>	
Effluent:	<u>4/year</u>	<u>4/year</u>	<u>Quarterly</u>	
Sludge:	<u>Annually</u>	<u>Annually</u>	<u>Annually</u>	
Organics: Influent:	<u>Annually</u>	<u>Annually</u>		
Effluent:	<u>Annually</u>	<u>Annually</u>		
Sludge:	<u>N/A</u>	<u>N/A</u>		Sludge returned to ponds

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?
There have been no upsets or inhibitions.

C. INDUSTRIAL USER CONTROL MECHANISM

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

2. How many IU permits (or other control documents) have been issued? 5 Significant Users; 3 Non-significant Users

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 Significant IUs 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: Yes

IU reporting requirements: Yes

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

Sample location: Yes

Type of sample: Yes

Monitoring frequency: Yes

Bypass prohibition: Yes

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

Penalty Provisions: Yes

Slug load notification: Yes

Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:
- | | |
|--------------------------------|---|
| Current frequency: | Program Requirement: |
| Sampling:
categorical IUs | <u>Batch loads are tested</u> <u>Twice/Year</u> |
| other SIUs | <u>N/A</u> <u>N/A</u> |
| Inspection:
categorical IUs | <u>Annually</u> <u>Annually</u> |
| other SIUs | <u>N/A</u> <u>N/A</u> |
2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes
3. Are inspections announced or unannounced? Unannounced
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: This facility uses
ADEQ inspection templates.
-
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

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? John Peppers, Superintendent, reviews 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

16. **IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?** Yes

17. What are the POTW's procedures for following up violations?
Phone call informs of issue, letter is sent; NOV issued if problem persists.

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: **City completes all sampling (Duckwater and Miller complete pH sampling)**

5. Comments on the POTW's enforcement procedures:
Batch testing is an effective way to manage if there are no slug loads.

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:
Yes
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? Yes
3. Does the POTW have copies of permits for IUs in other cities? Yes
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? None
5. Comments on multijurisdictional issues: None

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Miller Transport

POTW Name: City of El Dorado

Industry Contacts: Richard Freeman, Terminal Manager

Date and Time of Visit: August 20, 2019 ; 11:12

Description of Manufacturing Process:
Interior tank washing; exterior fleet service washing

Sources of Process Wastewater:
Tank interiors and equipment washing

Categorical Industry? Yes

Basis for Limits: Categorical Pretreatment

Point of Application: Discharge to POTW

Description of Pretreatment Equipment and Procedures:
Initial Tank > oil/water separator > chemical pH adjustment > batch sampling > POTW after sampling

Spill Prevention and Solvent Management Procedures:
Spill kits, ER wagon, and absorbent pads/booms

Sampling Location and Equipment:
No sampling has been conducted in two years because Miller Transport has discontinued the washing of tank interiors and only does minimal equipment cleaning. Miller Transport is in the process of discontinuing the pretreatment program. This inspection verified no interior tank washing is taking place currently.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Prescolite - Reflector Plant

POTW Name: City of El Dorado

Industry Contacts: Michael L. Phillips, Engineering Manager

Date and Time of Visit: August 20, 2019 ; 11:33

Description of Manufacturing Process:
Aluminum disk spun > aluminum disk buffed > aluminum disk cleaned in process baths
> bright dip process > anodizing

Sources of Process Wastewater:
Cleaning baths, bright dip; anodizing

Categorical Industry? Yes

Basis for Limits: Categorical Pretreatment

Point of Application: Discharge to POTW

Description of Pretreatment Equipment and Procedures:
pH adjustment in equalization tank > chemical addition (floc) > POTW

Spill Prevention and Solvent Management Procedures:
Spill kits; absorbent pads/booms

Sampling Location and Equipment:
Sampling takes place at an outfall prior to discharging to POTW and after final pretreatment.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Michael Young</u>	
NAME OF FACILITY:	<u>City of El Dorado</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0033723</u>	NPID
DATE OF PCI:	<u>August 20, 2019</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>5</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