

ADEQ

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

November 14, 2019

Heath Ward, Executive Director
Springdale Water Utilities
P.O. Box 769
Springdale, AR 72765

RE: City of Springdale Pretreatment Compliance Inspection
AFIN: 72-00003 Permit No.: AR0022063

Dear Mr. Ward:

On September 17 & 18, 2019, I performed a Pretreatment Compliance Inspection of the City of Springdale's Pretreatment Program in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

No violations were noted at the time of the inspection. Please refer to the attached inspection report for any comments.

If I can be of any assistance, please contact me at grimesg@adeq.state.ar.us or 479-267-0811 extension 16.

Sincerely,



Garrett Grimes
District 1 Field Inspector
Office of Water Quality



ARKANSAS
Department of Environmental Quality

OFFICE OF WATER QUALITY INSPECTION REPORT

| | | |
|---|----------------------------|------------------------|
| AFIN: 72-00003 | PERMIT #: AR0022063 | DATE: 9/17/2019 |
| COUNTY: 72 Washington | PDS #: 110038 | MEDIA: WN |
| GPS LAT: 36.211196 LONG: -94.160504 LOCATION: Entrance | | |

FACILITY INFORMATION

NAME:
City of Springdale
LOCATION:
2910 Silent Grove Road
CITY:
Springdale

RESPONSIBLE OFFICIAL

NAME: / TITLE
Heath Ward / Executive Director
COMPANY:
Springdale Water Utilities
MAILING ADDRESS:
P.O. Box 769
CITY, STATE, ZIP:
Springdale AR 72765
PHONE & EXT: / FAX:
479-751-5751 /
EMAIL:

CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

| | | | |
|--|--|----------------------------|---|
| FACILITY TYPE: 1 - Municipal | INSPECTOR ID#: 104111 S - State | | |
| FACILITY EVALUATION RATING: 5 - Satisfactory | INSPECTION TYPE: Pretreatment Compliance | | |
| DATE(S): 9/17/2019 | ENTRY TIME: 09:00 | EXIT TIME: 15:30 | PERMIT EFFECTIVE DATE: 4/1/2004 |
| 9/18/2019 | 09:00 | 12:00 | PERMIT EXPIRATION DATE: 3/31/2009 |

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Bradley Stewart, Pretreatment Manager, Springdale Water Utilities;
Tiffany Mallard, Laboratory Supervisor, Springdale Water Utilities;
Garrett Grimes, District 1 Inspector, ADEQ

AREA EVALUATIONS

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

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

SUMMARY OF FINDINGS

No violations were noted.

GENERAL COMMENTS

Springdale Water Utilities operates a well-managed pretreatment program. Mr. Stewart was very knowledgeable about the specifics of the program and maintains a good professional relationship with the Industrial Users observed during the course of the inspection. Ms. Mallard is the Lab Supervisor, but is in the process of being trained for familiarity with the pretreatment program. Ms. Mallard had a good grasp on the concepts of the program and was able to answer questions, provide input, and assist Mr. Stewart with the inspection.

However, some concerns were noted during the inspection:

- 1. Typos were observed on the control documents of Kawneer Company Inc., Pappas Foods, and Tyson Food and Research. These typos set the self-monitoring requirement date range to those of the previous permit. This appeared to be a mistake made when the permit was reissued.**
- 2. Composite samples obtained from George's Inc. by Springdale Water Utilities on July 1, 2, & 12; 2017 were noted as above 6 degrees C Springdale Water Utilities' records. These were flagged as a QA/QC issue and used with Springdale Water Utilities' Surcharge Program. However, these were also reported on the Pretreatment Annual Report. Sample and analyses used in the Pretreatment Program must conform to the standards and methods outlined in 40 CFR 136.**

| | | |
|---|------------------------|-------------------------|
| INSPECTOR'S SIGNATURE: <i>Garrett Grimes</i> | Garrett Grimes | DATE: 10/16/2019 |
| SUPERVISOR'S SIGNATURE: <i>Brent L Walker</i> | Brent L. Walker | DATE: 11/13/2019 |

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

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|--|
| Name of Municipality: Springdale Water and Sewer Commission |
| AFIN Numbers: 72-00003 |
| NPDES Permit Number(s): AR0022063 |
| Program Tracked under NPDES Permit Number: AR0022063 |
| Fact Sheet Preparation Date: |
| Date of Last PCI/Audit: September 17, 2015 (PCI); February 12-14, 2013 (Audit) |
| Date of Last Annual Report: January 29, 2019 |
| Name of Inspector: Garrett Grimes, District 1 Inspector, Office of Water Quality, ADEQ |
| Date PCI Performed: September 17-18, 2019 |
| Name, Title, and Telephone Number of Facility Representative: Bradley Stewart, Pretreatment Manager, 479-756-3657; Tiffany Mallard, Laboratory Supervisor |
| Name and Title of Other Participants: Andrew Kreigbaum, Environmental Engineer, Kawneer Company; Nick Nathan, EHS Manager, Kawneer Company; Bud Kirk, Wastewater Manager, George's Inc. (Present for respective site visits) |
| Number of IUs Visited: 2 |
| Name(s) of IUs Visited: Kawneer Company, Inc.; George's inc. |
| 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. Apex Tool Group (CIU) was closed on 8/29/2016 after ceasing operation and removing all processes. Contemporary Products, Inc. (Non-discharging CIU) was closed on 12/14/2015 after ceasing operation and removing all processes. | |
| 2. Has ADEQ or EPA been notified of these changes? Yes | |
| 3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes, Continuous. | |
| 4. What procedures are being used to update the IU Survey? IU survey sent monthly. City of Springdale checks business records and new water user accounts | |
| 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): 17, in addition to the 3 (2 are non-discharge) categorical IUs there are 14 other SIUs. The SIUs are located in the 2018 Annual Pretreatment Program Report submitted by the permittee on January 29, 2019. The report can be found on the DEQ website. | |
| 6. Number of Categorical Industrial Users: 3 (2 are non-discharging permit holders) | |
| 7. How does the POTW determine the appropriate categorical standards to apply to an IU? Use the EPA guidance manual and consult the state coordinator. | |
| 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. Update according to any changes | |
| Name of IU: | Category: |
| Kawneer Co., Inc. | Aluminum Forming & Extrusion, 40 CFR Part 467; Anodizing and Painting, 40 CFR Part 433 |
| Northwest Metalfinishing (Non-discharge, Permitted by the City) | Metal Finishing, 40 CFR Part 433 |
| P.M. Industries (Non-discharge, Permitted by the City) | Metal Finishing, 40 CFR Part 433 |
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| B. LOCAL LIMITS | | | | | |
| 1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? <u>Not currently applying limits, will be conducting a study (2020)</u> | | | | | |
| 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 II, Condition 9 of the NPDES Permit? See 40 CFR 122 Table III (Metals) and Table II (Organics). | | | | | |
| | | | Requirement in | | |
| Pollutant: | Frequency: | Permit: | | Program: | Comments: |
| Metals: | | | | | |
| Influent: | Quarterly | Quarterly | | Quarterly | |
| Effluent: | Quarterly | Quarterly | | Quarterly | |
| Sludge: | Quarterly | | | | |
| Organics: | | | | | |
| Influent: | Annually | Annually | | Annually | |
| Effluent: | Annually | Annually | | Annually | |
| Sludge: | Annually | | | | |
| Sludge TCLP on request by Waste Management (Contractual requirement not part of P2). | | | | | |
| 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 permittee to ensure that the incident would not recur. Were these actions effective? Yes Dates: Unknown upset (2018) ADEQ notified, details attached (Attachment 1). | | | | | |

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| C. INDUSTRIAL USER CONTROL MECHANISM | |
| 1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Control Document/Permit | |
| 2. How many IU permits (or other control documents) have been issued? 17 | |
| 3. DO ALL <u>SIGNIFICANT IUS</u> 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, on page 1 of permit (after cover letter) |
| | Discharge limitations: Yes, on page 2 for both CIUs and SIUs |
| If the program requires self-monitoring by the IUs, do the permits contain: | |
| | IU self-monitoring requirements: Yes - Typos on monitoring requirement dates for Kawneer, Pappas, and Tyson Food and Research. Monitoring date range reflects former permits. |
| | IU reporting requirements: Yes |
| 5. Indicate which of the following recommended standard conditions are contained in the control documents: | |
| | Sample location: X |
| | Type of sample: X |
| | Monitoring frequency: X *SEE ABOVE |
| | Bypass prohibition: X |
| | Right of entry: X |
| | Nontransferability: X |
| | Revocation clause: X |
| | Penalty Provisions: X |
| | Slug load notification: X |
| | Notification of process change: X |

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| D. MONITORING OF IUS BY POTW | | | |
| 1. Indicate current inspection and sampling frequency and program requirement below. 40 CFR 403.8(f)(2)(v): Inspect and sample the effluent from each SIU at least once/year. How often are Non-SIUs inspected and sampled? | | | |
| | | <u>Current frequency:</u> | <u>Program Requirement:</u> |
| Sampling: | | | |
| Categorical IUs | >1 | Frequency based on flow reported by IU | Annually |
| Other SIUs | >1 | Frequency based on flow reported by IU | Annually |
| Non-SIUs | NA | | NA |
| Inspection: | | | |
| Categorical IUs | | Annually | Annually |
| Other SIUs | | Annually | Annually |
| Non-SIUs | | Annually | |
| 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? Inspection report form filled on-site. | | | |
| 5. Does the inspection report contain an adequate description of the following: | | | |
| | Date and time of inspection: Yes cover page and Summary Inspection Page (4). | | |
| | Officials present: Yes cover page and Summary Inspection Page (4). | | |
| | Inspection of chemical storage areas: Yes, Page 7 - Notes of Chemical storage areas with continuation onto page 10 | | |
| | Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes, Page 5: Process descriptions with diagram. | | |
| | Inspection of the pretreatment facilities: Yes | | |
| | Review of self-monitoring records: Yes, Page 1: records checked | | |
| | Observation of IU self-monitoring procedures: Inspection requires that the IU take a pH sample, check QA/QC, Check equipment. | | |
| | Verification that approved analytical techniques are used: See above | | |

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| | Verification of IU flow measurement (where required): Check that measurements are done when required, check the IUs calibration record. |
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| | 6. Overall adequacy of inspection documentation: Good, may want to check flow calibrations. |
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| <p>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</p> |
| <p>8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Composite samples for Georges were above 6 degrees c on 7/1/17,7/02/17,7/04/17, and 7/12/2017 - Used with Surcharge program and flagged with QA/QC issue. Is used on annual report.</p> |
| <p>9. Are sampling and flow monitoring equipment properly maintained? Require IU to purchase composite sampler, Parshall Flumes or other flow measurement device, or use water meter.</p> |
| <p>10. Is the POTW keeping proper field notes and chain of custody forms? Yes</p> |
| <p>11. Is the sampling location representative of the discharge to the collection system? Permitted Outfall</p> |
| <p>12. Are sampling locations identified in POTW records? Yes</p> |
| <p>13. Are sampling services available in an emergency? Authority and access to facility sampling equipment, Control Authority sampling equipment that can be deployed to lift station. Can be done 24/7.</p> |
| <p>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? Main report is the self-monitoring report, mailed to facility or hand delivered. These reports are compared to the permit for accuracy and compliance, then the report goes to folder. Other documents would be reviewed against other correspondence with the facility and conditions in the permit before being placed in the IU's file.</p> |
| <p>15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes</p> |
| <p>16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes, Response depends on the nature of the violation. Follow the Enforcement Response Plan. Typically self-reported/notified to Control Authority within 24-hrs. When aware of violation account for how it was discovered self-monitoring or compliance monitoring, document violation type, check for next day repeat sampling. Use Enforcement Response Plan to determine appropriate course of action.</p> |

17. What are the POTW's procedures for following up violations?
Procedures outlined in City Ordinance No. 2842:

Publication of Significant violators in local newspaper;

Admin Enforcement Remedies:

- 1) Notice of Violation (NOV) - can be informal (verbal) or a written NOV issuant required to respond 10-days after receipt with explanation and corrective action plan.
- 2) Consent Orders - can be issued for assurance of voluntary compliance or an agreement with users responsible for non-compliance. Documents include specific action taken by user to correct non-compliance within a certain time period.
- 3) Show Cause Hearing - User is ordered to appear before the control authority to explain reasons for enforcement action to not be placed in effect. (Disprove violation).
- 4) Compliance Orders - Control authority issues an order requiring user to come into compliance during a certain timeframe or access to the sanitary sewer line can be revoked. Orders may include requirements of additional monitoring and updated management practices.
- 5) Cease and Desist Orders - can require users to immediately comply with all the requirements of the permit and take appropriate remedial or corrective action to prevent address continuing or threatened violations. Can include halting operations and terminating the discharge.
- 6) Administrative Fines - When a user has been found to violate or continue to violate provisions of the ordinance they can be fined up to \$1000 per day per violation as well as possible costs associated with preparing administrative enforcement actions.
- 7) Emergency Suspensions - The control authority can immediately suspend a user's discharge after informal notice to the user whenever such suspension is necessary to stop an actual or threatened discharge which reasonably appears to present or cause an imminent or substantial endangerment to a person's health or welfare.
- 8) Termination of Discharge - Subjects the user to terminate discharge in response to code violations.

Judicial Enforcement Remedies:

- 1) Injunctive Relief - If an IU violates or continues to violate a provision of the code, permit, or order; a temporary or permanent injunction can be issued to restrain or compel the specific performance of the wastewater discharge permit, order, or other requirement imposed by the code. This may also include environmental remediation.
- 2) Civil Penalties - Can require civil penalties of \$1000 per violation, per day to be paid to the control authority.

Civil liability amount is determined extent or harm caused, magnitude or duration, and economic benefit gained by the user, etc.

- 3) Cost Recovery - Can recover the attorney's fee cost and other costs associated with enforcement activities.
- 4) Remedies Nonexclusive - Allows the control authority to take any combination of above listed actions listed above

Enforcement Response Plan detailing the use of the above actions by the control authority is included as Attachment 2.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? NA, no new categorical IUs since the early 1980's. BMR for Kawneer no longer present at the facility.

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:

Other environmental permits held:

Description of operations:

Process flow diagrams:

Flow measurements:

Measurements of regulated pollutants:

Certification of compliance by the IU:

Compliance schedule (if needed):

19. Additional comments on the POTW's inspection and sampling procedures: **Springdale should verify +/-10% for flow meters during inspection. ADEQ recommends carrying separate individual COC form for collection rather than only log.**

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| 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: Follow Enforcement Response Plan, verify lab data and QAQC, resample. If IU encounter Excursion they resample. If in compliance after sample event - will issue informal (verbal) NOV or written NOV. If not in compliance -continue until compliance each event is an NOV (formal). Next step is and Administrative Order (automatic if causing harm to plant). | | | | |
| Late reports: Missing information (informal) can correct. <30-days late is informal, >30-days formal NOV. Failure to submit and no harm to the plant is informal, harm = formal. Falsification on report = Administrative order. | | | | |
| Unpermitted discharges: Discharge w/out a permit - no harm and unaware- informal NOV and need to obtain permit. For non-discharging permits - knowledge of process to CA = formal NOV, no knowledge = informal NOV. | | | | |
| Slug loads or spills: Reported or detected slug loads with no harm are informal NOV, with harm is a formal NOV | | | | |
| *for repeat occurrences enforcement level increases | | | | |
| 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)? NA | | | | |
| 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: | |
| NO Sig Viol. | | | | |
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| 5. Comments on the POTW's enforcement procedures: |
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| 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? 1 full time pretreatment (Brad), 5 Lab staff spend about 30% of time with pretreatment (rotations) |
| |
| 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: JB Hunt in Lowell |
| |
| 2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? Yes permits issued and can operate in City of Lowell - adopted Springdale's Sewer Use Ordinance |
| |
| 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? No |
| |
| 5. Comments on multijurisdictional issues: None noted |
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| H. EVALUATION AND COMMENTS |
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IU SITE VISIT FORM

Name of Industry: **Kawneer Company, Inc.**

POTW Name: **Springdale Water Utilities**

Industry Contacts: **Andre Kriegbaum, Environmental Engineer;**
Nick Nathan, EHS Manager

Date and Time of Visit: **10:15**

Description of Manufacturing Process:

Aluminum is extruded from billets then shaped and hardened.

Kawneer primarily produces aluminum windows and doors.

Windows and doors are painted in the DMP and Anode lines. Refer to Attachment 3 for additional information.

Sources of Process Wastewater:

Two lines, DMP Line and Anode line - Both are for coating and painting.

Categorical Industry? **Yes**

Basis for Limits: **40 CFR 467**

Point of Application: **Outfall 001**

Description of Pretreatment Equipment and Procedures:

Pretreatment encompasses waste streams from two separate lines. A DMP line which preps formed aluminum for painting and an Anode line which acts as an etching/coating line for the aluminum. These waste streams are kept separate during pretreatment because solids pressed from the DMP line are hazardous waste. The final effluent is recombined in a tank and discharged to the City of Springdale's POTW.

Spill Prevention and Solvent Management Procedures:

The facility utilizes troughs in the floor to capture and direct spilled wastewater to appropriate sumps for pumping back into treatment. The facility also maintains absorbents for spills.

Sampling Location and Equipment:

All effluent discharges through Outfall 001. A Parshall flume and a bubble meter are in place for flow measurements. Water is collected below from the outfall by the facility's composite sampler. All appeared in good condition.

IU SITE VISIT FORM

Name of Industry: **George's Inc.**

POTW Name: **Springdale Water Utilities**

Industry Contacts: **Bud Kirk, Wastewater Manager**

Date and Time of Visit: **9/18/2019 9:15**

Description of Manufacturing Process:

Line birds are hung and killed before being scalded and defeathered. Birds are then eviscerated, washed, chilled, and sorted. Birds are then packaged whole or processed further (cut apart, marinated).

Sources of Process Wastewater:

Blood from the kill, water used in the defeathering and eviscerating, and wash/chill water (non-reused) are collected for pretreatment.

Categorical Industry? **No**

Basis for Limits: _____

Point of Application: **Outfall 001**

Description of Pretreatment Equipment and Procedures:

Shaker screens remove solids and feathers with the feathers sold for pet food manufacturing. Afterwards the wastewater pH is adjusted and three polymers are added to cause flocculation of particles and encourage settling of solids. The wastewater then enters a Dissolved Air Flotation (DAF) unit. Solids are allowed to settle in this unit and are removed. These solids are then land applied in Missouri by Bub's Inc. The wastewater then passes through a Parshall Flume for flow measurement prior to discharge to the POTW collection system.

Spill Prevention and Solvent Management Procedures:

Secondary containment for the polymer tanks are present and spill kits were available.

Sampling Location and Equipment:

Samples are taken at the Parshall Flume at Outfall 001. Flow is measured at this flume with instantaneous measurements taken using a bubble meter. At the time of the inspection, Mr. Kirk stated that calibration checks are done at the meter. However, the meter is not being routinely calibrated.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

| | |
|---|------|
| | CODE |
| INSPECTOR'S NAME: Garrett Grimes | |
| NAME OF FACILITY: Springdale Water Utilities | |
| PERMIT NUMBERS USED TO TRACK PROGRAM: AR0022063 | NPID |
| DATE OF PCI: September 17-18, 2019 | DTIA |
| PPETS WENDB DATA ELEMENTS | |
| NUMBER OF SIGNIFICANT IUS (SIUS): 17 | SIUS |
| NUMBER OF CATEGORICAL IUS: 3 | CIUS |
| SIUS NOT SAMPLED OR INSPECTED BY POTW: 0 | NOIN |
| SIUS WITHOUT CONTROL MECHANISM: 0 | NOCM |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING: 0 | PSNC |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS: 0 | MSNC |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY THE POTW: 0 | SNIN |

Attachment 1

Correspondence Detailing Springdale Water Utilities' Response
to the August 2018 Upset

Anderson, Alan

From: Jennifer <jenos@springdalewater.com>
Sent: Monday, September 24, 2018 11:19 AM
To: Healey, Richard
Cc: Heath; Brad; Loren; Shannon; Johnson, Miles; Anderson, Alan; Tiffany; Bolenbaugh, Jason; Leamons, Bryan; Grimes, Garrett
Subject: RE: NPDES Permit No. AR0022063 - Springdale WWTF plant upset

Follow Up Flag: Follow up
Flag Status: Flagged

All:

It appears that placing the fourth process train in service on September 14, 2018 helped speed up our facility's recovery from the upset originally reported on August 31, 2018. By September 16, NH3-N had dropped significantly and has remained far below permit limitations. Barring any future, unforeseen events, we believe that the upset has been resolved leaving the facility in normal operation, albeit with 4 trains remaining in service at this time.

A full report with analytical results, actions taken, and future plans will be attached to Springdale's September 2018 DMR (on CDX), and will be forwarded to those copied above.

Sincerely yours,

Jennifer E. Enos
Wastewater Facilities Director
Springdale Water Utilities
PO Box 769
Springdale, AR 72765-0769
jenos@springdalewater.com

From: Healey, Richard
Sent: Monday, September 17, 2018 11:36 AM
To: Jennifer
Cc: Heath ; Brad ; Loren ; Shannon ; Johnson, Miles ; Anderson, Alan ; Tiffany ; Bolenbaugh, Jason ; Leamons, Bryan
Subject: RE: NPDES Permit No. AR0022063 - Springdale WWTF plant upset

Jennifer
Thank you for the update.

Richard C. Healey
Enforcement Branch Manager
Office of Water Quality
Arkansas Department of Environmental Quality

501-682-0640

healey@adeq.state.ar.us

From: Jennifer [<mailto:jenos@springdalewater.com>]

Sent: Monday, September 17, 2018 10:08 AM

To: Healey, Richard; Pemberton, Layne; Johnson, Miles; Anderson, Alan

Cc: Heath; Brad; Loren; Shannon; Tiffany

Subject: RE: NPDES Permit No. AR0022063 - Springdale WWTF plant upset

All:

Please allow this to serve as an update to the original email sent out last Monday.

Springdale's WWTF has experienced a third 7 day average NH₃-N excursion. For the week of September 9 – 15, the average was 4.36 mg/L, well above the permit limitation of 2.3 mg/L. Operations staff continue to check the receiving stream with no apparent environmental impact observed.

We do not believe that there has been any overt toxicity since the original event, although a less severe toxicity affecting nitrifiers but not indicator microorganisms cannot be ruled out. Repeated microscopic examination of the mixed liquor yields excellent results. However, the facilities have been hit with excessive organic loading the last three weeks on top of the original toxicity. Source confirmation is underway, and it is believed that organic loading will be addressed through pretreatment processes that are currently under construction within our system. This excess loading has made recovery extremely difficult. In response to that loading, staff has put the fourth and final process train in service effective September 14, 2018. This new train was fully operational with good ammonia removal within 48 hours of going into service. The current plan is to continue to run all four trains as long as the facility is organically loaded above the design capacity of three trains. (Note: hydraulic design is 24 MGD, with an average of around 14 MGD coming into the plant, so the additional train is being used strictly for treatment of organics.)

Effluent NH₃-N for yesterday, September 16, 2018 was 0.12 mg/L. Results later this week will show whether the additional biomass and aeration afforded by the fourth train is sufficient to maintain low ammonia results for the rest of the week.

As before, please do not hesitate to call/email me if you have any questions concerning this event or our actions to monitor and mitigate.

Sincerely yours,

Jennifer E. Enos
Wastewater Facilities Director
Springdale Water Utilities
PO Box 769
Springdale, AR 72765-0769

From: Jennifer
Sent: Monday, September 10, 2018 5:55 PM
To: 'Healey, Richard' ; 'pemberton@adeq.state.ar.us' ; 'Johnson, Miles' ;
'anderson@adeq.state.ar.us'
Cc: Heath ; Brad ; Loren ; Shannon ; Tiffany
Subject: NPDES Permit No. AR0022063 - Springdale WWTF plant upset

All:

Per my conversation with Mr. Richard Healey, ADEQ, on September 7, 2018, attached is a timeline of events and actions taken over the last two weeks as they pertain to a plant upset originally reported to ADEQ by Springdale Water Utilities on August 31, 2018. This report will be refined, revised, and updated during the month of September, and a finalized version will be sent to each of you and attached to Springdale's September 2018 DMR. Verbal reports will also be made if this event continues past this date.

Please do not hesitate to email or call me at 479-756-3657 if you have any questions concerning this preliminary report or the actions taken. Springdale Water Utilities is proud of its long-standing record of compliance prior to this upset and is making every effort to identify the source(s) of toxicity and prevent any future excursions.

Sincerely yours,

Jennifer E. Enos
Wastewater Facilities Director
Springdale Water Utilities
PO Box 769
Springdale, AR 72765-0769
jenos@springdalewater.com

Attachment 2

Springdale Water Utilities Enforcement SOP

Standard Operating Procedure Enforcement

I. SUBJECT

Guidelines for carrying out enforcement actions.

II. PURPOSE

To establish a methodology for identifying industrial user (IU) noncompliance.

To meet 40 CFR 403.8(f)(5) and NPDES permit requirements, which require an Enforcement Response Plan that adequately addresses different type of violations and their corresponding enforcement actions.

III. SCOPE

This SOP describes the procedures used to identify noncompliance and the appropriate enforcement action(s) for each type of violation.

IV. TOOLS REQUIRED

- ◆ Sewer Use Ordinance
- ◆ Multijurisdictional agreement(s)
- ◆ IU file(s)

V. PROCEDURE

1. **Identifying Noncompliance.** Before enforcement proceedings begin, determine that the IU has not met the requirements of the pretreatment program. All IU noncompliance will be responded to and documented.

Harmless technical violations, as deemed appropriate by the Control Authority, can be exempt from enforcement action. Examples of technical violations: Excursion of pH limitations > 5.0 not more than fifteen minutes, non-reportable results due to laboratory QA/QC, equipment failure, etc.. Determination will also be based on user's historical compliance record. Successive and chronic occurrence of technical violations will be subject to enforcement action(s). All technical violations will be documented.

2. **Verifying Noncompliance.** Certain violation types may need to be verified prior to an enforcement action. Request for resubmission of data and site visits may also be used to verify data. All data and information collected should be admissible in court.

History of the IU's compliance should also be evaluated to determine the appropriate level of enforcement response.

3. **Response to Noncompliance.** Using the guidelines presented in the attached **Enforcement Response Guide**, initiate or recommend the enforcement response that is applicable to a specific noncompliance. Review the Sewer Use Ordinance prior to initiating or recommending enforcement actions to ensure that proper procedures are being followed. Issuance of a notice of violation or recommendation of other enforcement actions should be carried out within 30 working days from the date the violation was identified.
4. **Administrative Due Process.** Notice of administrative enforcement action must give the user an opportunity to appear and be heard before the Control Authority to contest the reason for or severity of such action. Procedures for a show cause hearing may be used to satisfy this requirement. Due process opportunities for notice and hearing are required in emergency situations a reasonable time after the necessity for the emergency response has passed.
5. **Documentation.** Maintain all records and documentation.

VI. RESPONSES TO NONCOMPLIANCE

Following is a nonexclusive list of types of responses to noncompliance by an industrial or other user of Springdale's sanitary sewer system. It includes a description of the type of response and a listing of the person(s) who usually initiate the response.

1. **Informal Notice (INF).** An informal notice of noncompliance. May be made in person, or by telephone, fax, or mail. This type of notice is documented and placed in the enforcement files.
Person: Pretreatment Coordinator, Industrial Inspector.
2. **Notice of Violation (NOV).** A Control Authority document notifying a user that it has violated pretreatment standards and requirements. Generally used when the violation is relatively minor and the Control Authority expects the violation to be corrected within a short time. The document may be hand-delivered or mailed, however, if a response is required to the NOV, it must be hand-delivered or sent by certified mail.
Person: Pretreatment Coordinator, Industrial Inspector.

3. **Administrative Order (AO).** A document which orders the violator to perform a specific act or refrain from an act. For example, the order may require users to attend a show cause meeting, cease and desist discharging, or undertake activities pursuant to a compliance schedule.
Person: Executive Director, Pretreatment Coordinator.
4. **Cease and Desist Order (CDO).** An administrative order directing a user to immediately halt illegal or unauthorized discharges.
Person: Executive Director (If unavailable and CDO due to an emergency situation, Plant Manager, Plant Superintendent, Pretreatment Coordinator.)
5. **Costs (COST).** Recovery of any costs incurred by the Control Authority as a result of discharger noncompliance.
Person: Executive Director.
6. **Administrative Fine (FINE).** A punitive monetary or other charge for a violation of the law. Administrative penalty not to exceed \$1000.00 per violation per day.
Person: Executive Director.
7. **Judicial Action (JUD).** An enforcement action that involves a court. May be used for such actions as seeking injunctive relief, civil penalties, and/or criminal prosecution through court action.
Person: Executive Director.
8. **Publication (PUB).** Mandatory publication in the largest local newspaper of a user meeting Significant Noncompliance criteria in 40 CFR 403.8 (f)(vii).
Person: Executive Director, Pretreatment Coordinator.
9. **Revocation of Permit and/or Termination of Service (REV).** A formal notice of termination of service, or a physical blockage of the sewer connection or water connection to a noncompliant user.
Person: Executive Director (If unavailable and REV due to an emergency situation, Plant Manager, Plant Superintendent, Pretreatment Coordinator.)
10. **Show Cause Order (SHOW).** An administrative order directing a noncompliant user to appear before the Control Authority, explain its noncompliance, and show cause why more severe enforcement actions against the user should not go forward.
Person: Executive Director
11. **Suspension of Service (SUS).** Suspension of water and/or sewer service, with or without notice, when necessary to halt an actual or threatened discharge which presents or may present an imminent or substantial endangerment to the health of welfare of persons, the environment, and/or the POTW.
Person: Executive Director (If unavailable and SUS due to an emergency situation, Plant Manager, Plant Superintendent, Pretreatment Coordinator.)

12. **Search Warrant (WAR).** A document issued by a magistrate or judge which authorizes entry into private premises to either determine compliance with applicable laws or collect evidence of noncompliance.
Person: Executive Director (If unavailable, Plant Manager, Plant Superintendent, Pretreatment Coordinator.)

VII. REFERENCES

- ◆ 40 CFR 403 General Pretreatment Regulations, final as of July 1, 1994
- ◆ Guidance Manual for POTW Pretreatment Program Development, U.S. EPA, October 1983
- ◆ Procedures Manual for Reviewing a POTW Pretreatment Program Submission, U.S. EPA, October 1983
- ◆ Guidance for Developing Control Authority Enforcement Response Plans, U.S. EPA, September 1989
- ◆ Guidance for Evaluating POTW Enforcement Response Plan Submittals, U.S. EPA, December 1991
- ◆ Pretreatment Monitoring and Enforcement Guidance, U.S. EPA, September 1986
- ◆ U.S. EPA Checklist for the Development or Modification of a Pretreatment Program, Region VI, July 1991

VII. ENFORCEMENT RESPONSE GUIDE

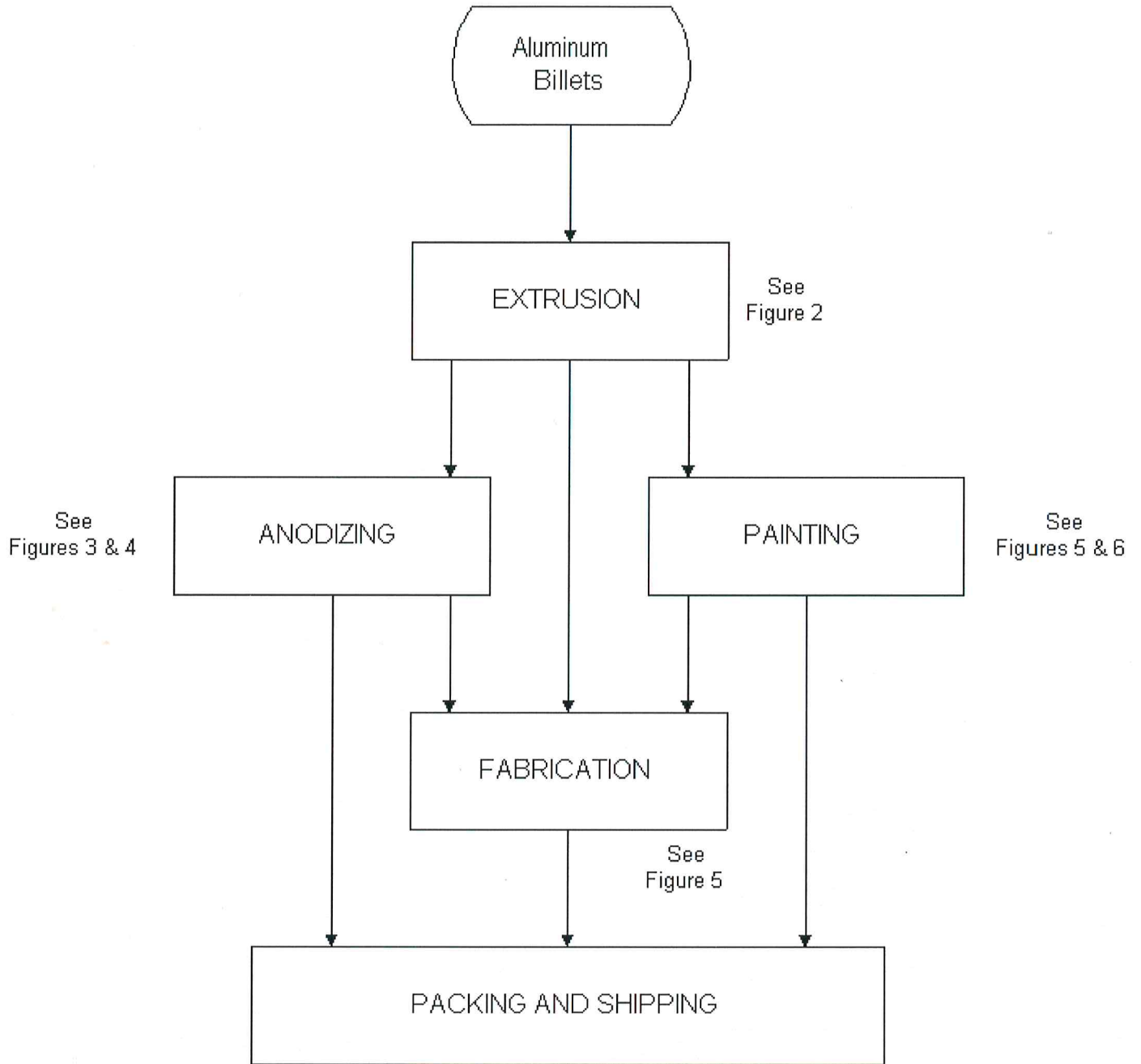
| <u>TYPE OF VIOLATION</u> | <u>RESPONSES</u> |
|--|--|
| 1. Discharge without a permit, IU unaware of requirement, no harm. | INF, NOV |
| 2. Discharge without a permit, IU unaware of requirement, harm. | NOV, AO, CDO, COST, FINE, JUD, PUB, SUS, SHOW, REV |
| 3. Discharge without a permit, IU aware of requirement, no harm. | NOV, AO, CDO, FINE, JUD, SUS, SHOW, REV |
| 4. Discharge without a permit, IU aware of requirement, harm. | AO, CDO, COST, FINE, JUD, PUB, SUS, SHOW, REV |
| 5. Discharge without a permit, failure to renew. (IU fails to submit application by due date). | INF, NOV, FINE, SUS |
| 6. Isolated exceedence of permit limit, no harm. | INF, NOV |
| 7. Isolated exceedence of permit limit, harm. | NOV, AO, CDO, COST, FINE, JUD, PUB, SUS, SHOW, REV |
| 8. Recurring exceedence of permit limit, no harm. | NOV, AO, CDO, FINE, PUB, SHOW, SUS |
| 9. Recurring exceedence of permit limit, harm. | AO, CDO, COST, FINE, JUD, PUB, SUS, SHOW, REV |
| 10. Reported or detected slug load, no harm. | INF, NOV |
| 11. Reported or detected slug load, harm. | NOV, AO, CDO, COST, FINE, JUD, PUB, SUS, SHOW, REV |
| 12. Report improperly signed or certified, information missing. | INF, NOV |
| 13. Late report, less than 30 days. | INF, NOV |
| 14. Late report, 30 days or more. | NOV, PUB, AO, SHOW |

- | | | |
|-----|--|--|
| 15. | Failure to submit a report or notice (no harm). | INF, NOV, PUB, AO, SHOW |
| 16. | Failure to submit a report or notice (harm). | NOV, AO, CDO, COST, FINE, JUD, PUB, SUS, SHOW, REV |
| 17. | Failure to accurately report noncompliance, unintentional. | INF, NOV, AO, SUS |
| 18. | Failure to accurately report noncompliance, intentional. | NOV, AO, FINE, JUD, PUB, SUS, SHOW, REV |
| 19. | Falsification of data or tampering with monitoring device. | AO, CDO, COST, FINE, JUD, PUB, SUS, SHOW REV |
| 20. | Improper sampling and/or analytical procedures. | INF, NOV, AO, CDO, COSTS, FINE, JUD, PUB, SUS, SHOW, REV |
| 21. | Failure to install monitoring equipment. | AO, COST, FINE, JUD, SUS, SHOW, REV |
| 22. | Missed milestone (no effect on final milestone). | INF, NOV, AO, PUB |
| 23. | Missed milestone (affecting final milestone). | NOV, AO, FINE, JUD, PUB, SUS, SHOW, REV |
| 24. | Use of dilution in lieu of treatment. | NOV, AO, CDO, FINE, JUD, PUB, SUS, SHOW, REV |
| 25. | Failure to mitigate noncompliance (or halt production). | NOV, AO, CDO, FINE, JUD, PUB, SUS, SHOW, REV |
| 26. | Failure to properly operate and maintain pretreatment | NOV, AO, FINE |
| 27. | Entry denial. | WAR, AO, FINE, JUD, SUS, SHOW, REV |
| 28. | Inadequate record keeping. | INF, NOV, AO |
| 29. | Failure to report additional monitoring. | NOV, AO, FINE, JUD, SUS, SHOW, REV |

Attachment 3

Kawneer Company Process Diagram

Figure 1. Overall Facility



KEY:

Waste Flow



Process Flow



Figure 2. Extrusion

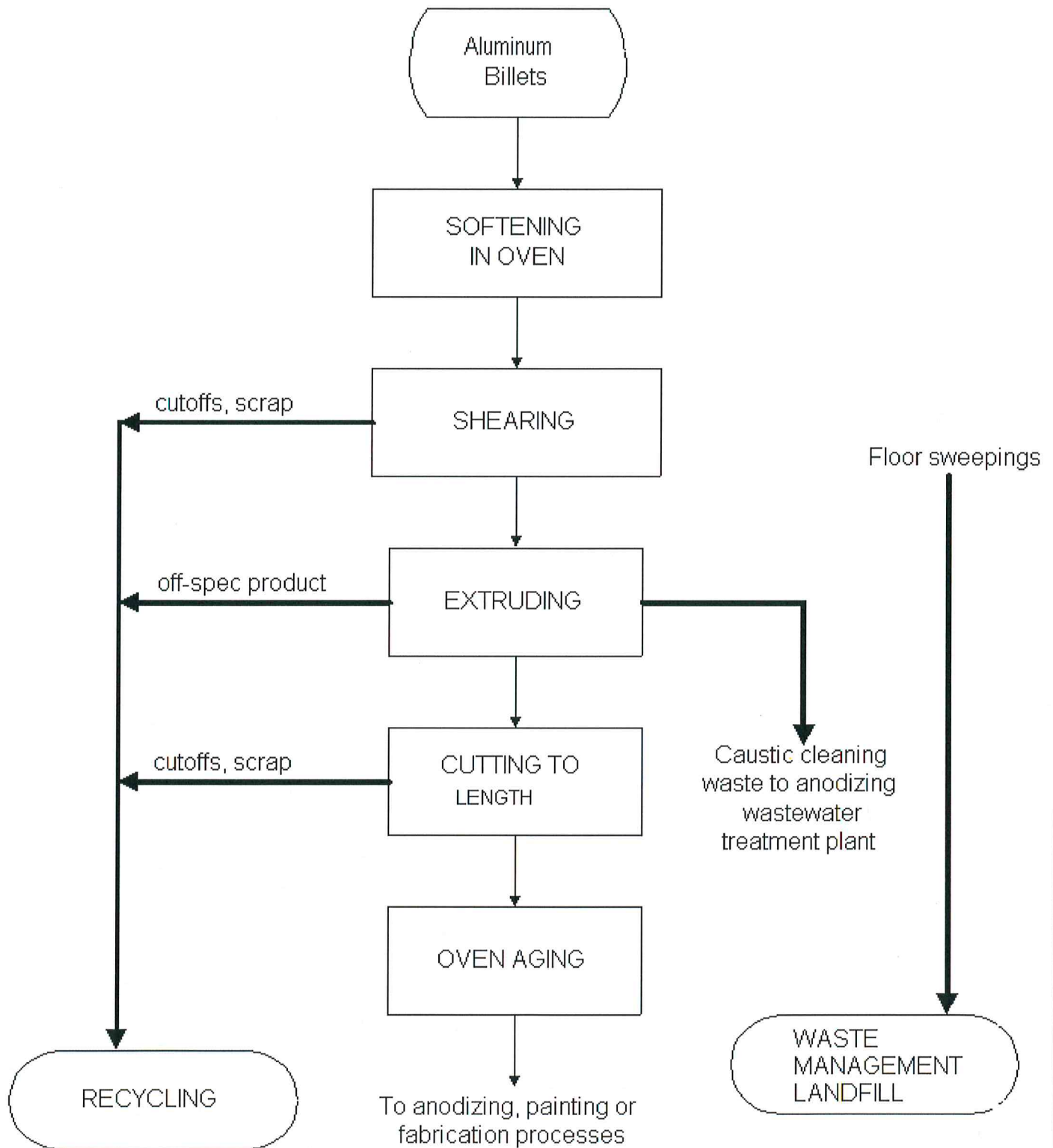


Figure 3. Anodizing

Note: The trench that conveys the wastewater is cleaned out periodically and generates additional solids for disposal.

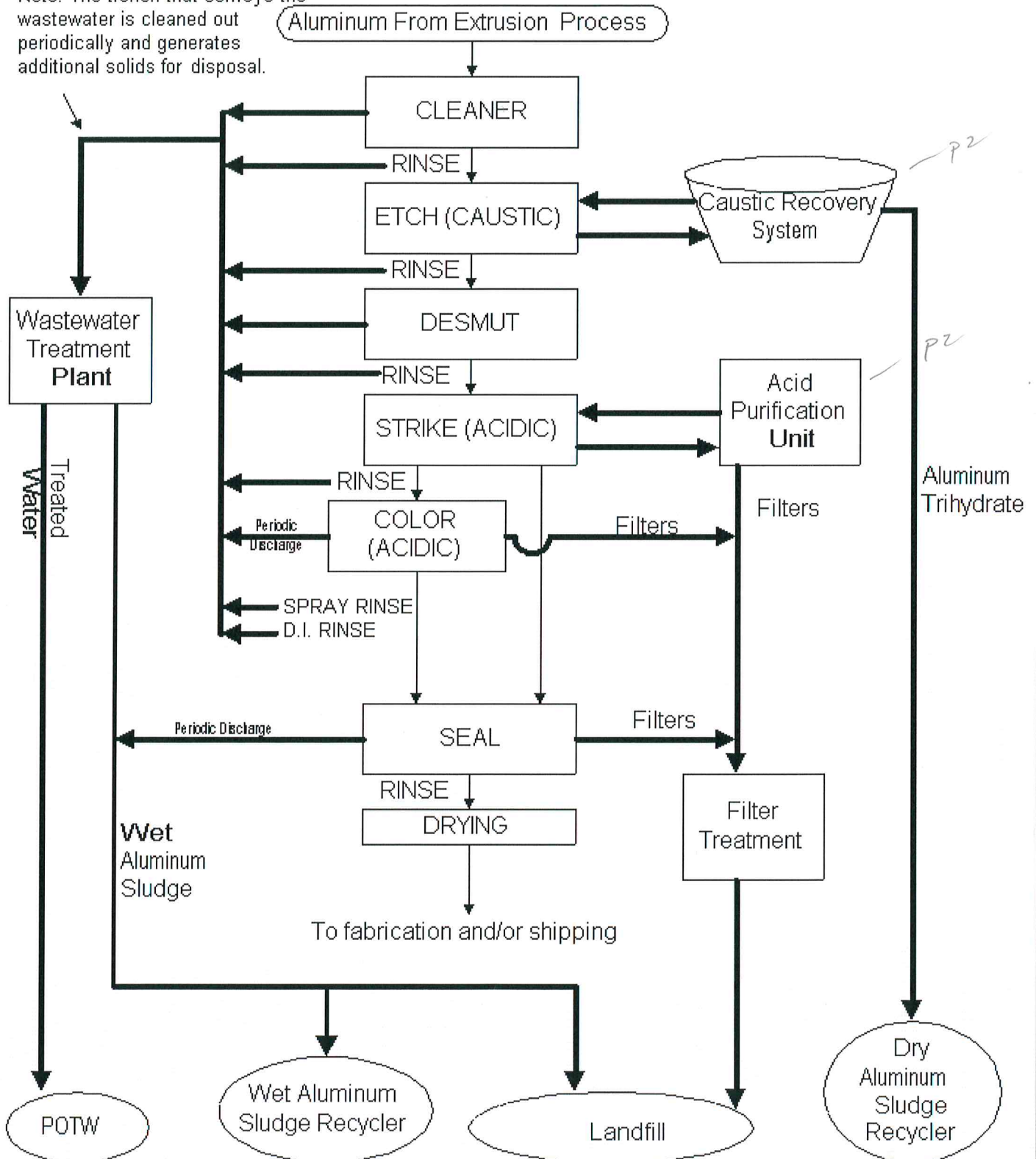


Figure 4. Wastewater Treatment

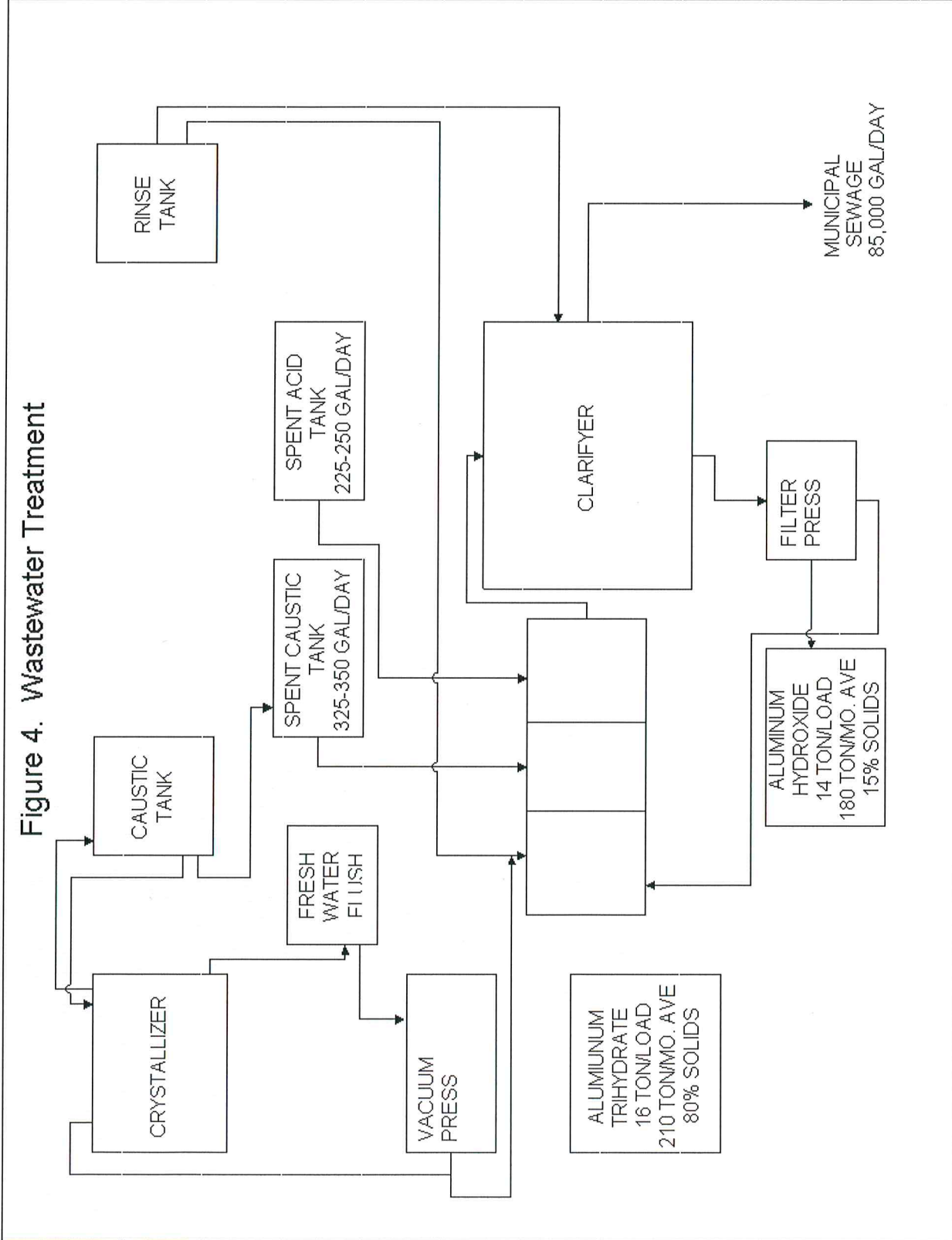
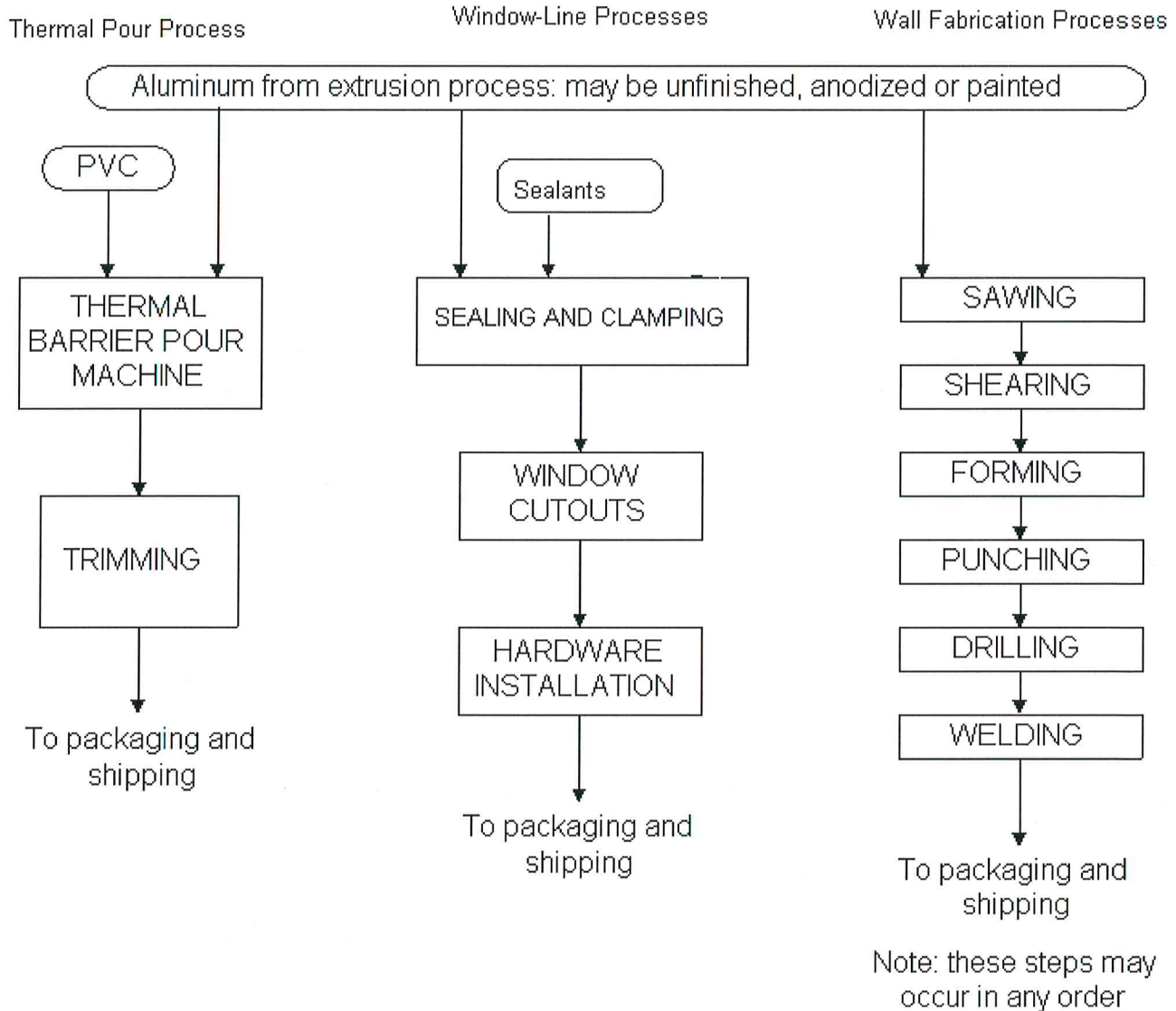


Figure 5. Fabrication



Wastes generated from these processes disposed of at Sunray Landfill:

- Floor sweepings
- Oil-dry waste
- Welding fume filters
- PVC waste
- Miscellaneous metal waste (mostly recycled)
- Aluminum (mostly recycled)

Figure 6. Paint Process

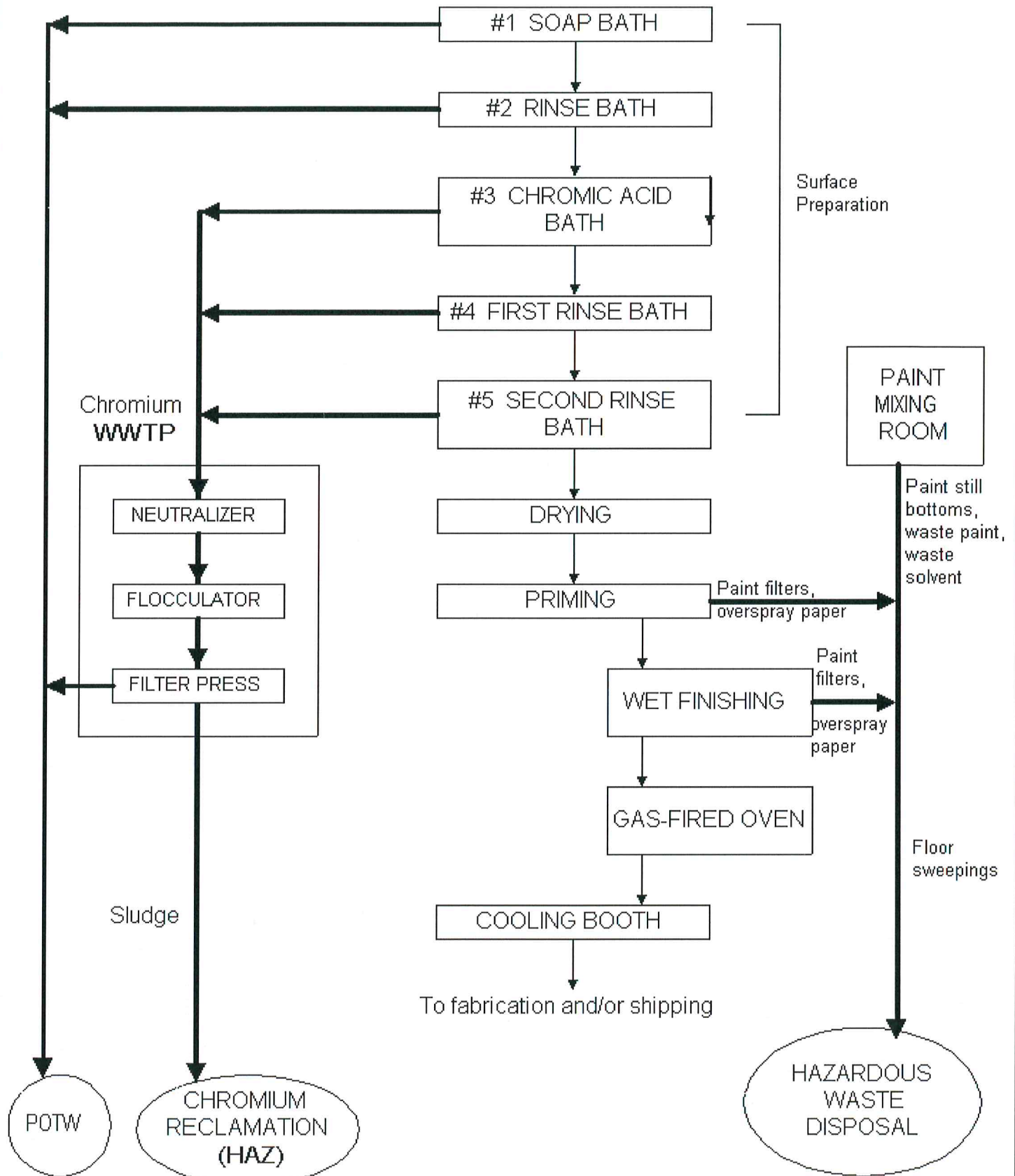


Figure 7. Paint Process Waste Details

