

December 11, 2020

Steve Mallett, General Manager  
Russellville City Corporation  
P.O. Box 3186  
Russellville, AR -728113186

**RE: Russellville City Corporation Inspection (Pope Co)**  
**AFIN: 58-00105                      NPDES Permit No.: AR0021768**

Dear Mr. Mallett:

On September 24, 2020, I performed a Pretreatment Compliance Inspection of the above-referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

**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 [beck@adeq.state.ar.us](mailto:beck@adeq.state.ar.us) or (479) 968-7339.

Sincerely,



Amy Beck  
District 5 Field Inspector  
Office of Water Quality

CC: Greg Kremers, Pretreatment Coordinator, [gkremers@citycorporation.com](mailto:gkremers@citycorporation.com)



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

## OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: 58-00105	PERMIT #: AR0021768	DATE: 9/24/2020
COUNTY: 58 Pope	PDS #: 114303	MEDIA: WN
GPS LAT: 35.248953 LONG: -93.116117 LOCATION: Entrance		

FACILITY INFORMATION	INSPECTION INFORMATION
<b>NAME:</b> Russellville City Corporation <b>LOCATION:</b> 404 Jimmy Lyle Road <b>CITY:</b> Russellville	<b>FACILITY TYPE:</b> 1 - Municipal <b>INSPECTOR ID#:</b> 36537 S - State <b>FACILITY EVALUATION RATING:</b> 3 - Satisfactory <b>INSPECTION TYPE:</b> Pretreatment Compliance <b>DATE(S):</b> 9/24/2020 <b>ENTRY TIME:</b> 09:00 <b>EXIT TIME:</b> 13:30 <b>PERMIT EFFECTIVE DATE:</b> 9/1/2016 <b>PERMIT EXPIRATION DATE:</b> 8/31/2021
RESPONSIBLE OFFICIAL	<b>FAYETTEVILLE SHALE RELATED:</b> N <b>FAYETTEVILLE SHALE VIOLATIONS:</b> N
<b>NAME / TITLE:</b> Steve Mallett / General Manager <b>COMPANY:</b> Russellville City Corporation <b>MAILING ADDRESS:</b> P.O. Box 3186 <b>CITY, STATE, ZIP:</b> Russellville AR -728113186 <b>PHONE &amp; EXT: / FAX:</b> 479-968-2105 / <b>EMAIL:</b> smallett@citycorporation.com <b>CONTACTED DURING INSPECTION:</b> No	INSPECTION PARTICIPANTS
	<b>NAME/TITLE/PHONE/FAX/EMAIL/ETC.:</b> Greg Kremers, City Corp Pretreatment Coordinator, 479-968-2080 x 237; gkremers@citycorporation.com

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

### SUMMARY OF FINDINGS

No violations cited.

### GENERAL COMMENTS

The WWTP pretreatment program has added two facilities since the last PCI: Aqua Contour Cutting (aka ACC) and Yell County Waste Management. ACC is a categorical user. Waste Management has been permitted to haul leachate to the WWTP; however, no loads have ever been received.

The Russellville City Corp pretreatment program has, again, been through staffing changes. This makes record management difficult as each Pretreatment Coordinator has a unique method for keeping records. Records, from the time Mr. Kremers took over the program, are complete and organized. Previous records are mostly complete.

Review of IU permits show not all permits have "slug load notification" requirement. The program should consider adding this requirement to all permits during the next permit cycle.

INSPECTOR'S SIGNATURE:  Amy Beck	DATE: 12/01/2020
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 12/10/2020

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

Name of Municipality: <b>Russellville City Corporation</b>
AFIN Number: <b>58-00105</b>
NPDES Permit Number(s): <b>AR0021768, ARG640036, ARR000104</b>
Program Tracked under NPDES Permit Number: <b>AR0021768</b>
Fact Sheet Preparation Date:
Date of Last PCI/Audit: <b>January 2015 - Audit</b>
Date of Last Annual Report: <b>February 2020</b>
Name of Inspector: <b>Amy Beck</b>
Date PCI Performed: <b>September 24, 2020</b>
Name and Title of Facility Representative: <b>Greg Kremers, Pretreatment Coordinator</b>
Name and Title of Other Participants: <b>N/A</b>
Number of IUs Visited: <b>2</b>
Name(s) of IUs Visited: <b>(1) Sugar Creek Foods, (2) ACC</b>
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED
<b>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.</b>

<b>A. INDUSTRIAL USER SURVEY</b>		
1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. <b>Aqua Contour Cutting (ACC), Waste Management - Ozark Ridge Landfill</b>		
2. Has ADEQ or EPA been notified of these changes? <b>Yes, on annual report.</b>		
3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? <b>Yes</b>		
4. What procedures are being used to update the IU Survey? <b>City Corp maintains a list of commercial and industrial customers to survey. Pretreatment section gets notified when new wastewater connections are requested. An industrial sector is chosen and survey is sent to all facilities in that sector.</b>		
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): <b>15</b>		
6. Number of Categorical Industrial Users: <b>4</b>		
7. How does the POTW determine the appropriate categorical standards to apply to an IU? <b>Based on 40 CFR 403</b>		
8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (i.e. Metal Finishing), and the regulated process (i.e. phosphating, zinc plating, etc.). Additional listings can be made in the comments section if necessary.		
Name of IU:	Category:	Regulated Process:
<b>P.O.M.</b>	<b>Metal finishing</b>	<b>Phosphatizing rinse</b>
<b>Taber Metals</b>	<b>Aluminum forming</b>	<b>Contact cooling and quench</b>
<b>Grace Manufacturing</b>	<b>Metal finishing</b>	<b>Phosphatizing rinse</b>
<b>ACC</b>	<b>Metal finishing</b>	<b>Zirconization</b>

**B. LOCAL LIMITS**

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? No, local limits were determined to be unnecessary at the beginning of the permit cycle.

2. Describe any apparent problems with the local limits. N/A

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Sampling Frequency	Permit Requirement	Program Requirement
Metals:			
Influent:	1/quarter	1/quarter	N/A
Effluent:	1/quarter	1/quarter	N/A
Sludge:	1/quarter	1/quarter	N/A
Organics:			
Influent:	1/quarter	1/quarter	N/A
Effluent:	1/quarter	1/quarter	N/A
Sludge:	1/quarter	1/quarter	N/A

Comments:

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?

Yes, occasional high BOD from ConAgra. Facility is upgrading pretreatment system. In 2019, POTW experienced high NH3-N from PPP. PPP is getting new aerators in ponds. There have been no permit violations.

<b>C. INDUSTRIAL USER CONTROL MECHANISM</b>
1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? <b>Permit</b>
2. How many IU permits (or other control documents) have been issued? <b>15 (all)</b>
<b>3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT. Yes, all SIU have current permits.</b>
4. Does the control document contain the following items? List the section of the permit each item is listed under.
An expiration date: <b>Yes</b>
Discharge limitations: <b>Yes</b>
If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under.
IU self-monitoring requirements: <b>Yes</b>
IU reporting requirements: <b>Yes</b>
5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under.
Sample location: <b>Yes</b>
Type of sample: <b>Yes</b>
Monitoring frequency: <b>Yes</b>
Bypass prohibition: <b>Yes</b>
Right of entry: <b>Yes</b>
Non-transferability: <b>Yes</b>
Revocation clause: <b>Yes</b>
Penalty Provisions: <b>Yes</b>
Slug load notification: <b>Not all permits have slug notification.</b>
Notification of process change: <b>Yes</b>

<b>D. MONITORING OF IUS BY POTW</b>			
1. Indicate current inspection and sampling frequency and program requirement below.			
	Current frequency:	Program Requirements:	
Sampling:			
Categorical IUs	<b>1/year</b>		<b>1/year</b>
Other SIUs	<b>1/year</b>		<b>1/year</b>
Non-SIUs	<b>1/year</b>		<b>1/year</b>
Inspection:			
Categorical IUs	<b>1/year</b>		<b>1/year</b>
Other SIUs	<b>1/year</b>		<b>1/year</b>
Non-SIUs	<b>1/year</b>		<b>1/year</b>
Comments:			
2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? <b>Yes (2019)</b>			
3. Are inspections announced or unannounced? <b>Unannounced</b>			
4. Are records kept of each inspection? <b>Yes</b>			
5. Does the inspection report contain an adequate description of the following:			
Date and time of inspection: <b>Yes</b>			
Officials present: <b>Yes</b>			
Inspection of chemical storage areas: <b>Yes</b>			
Description of regulated processes, categorical waste streams, and discharge location of these waste streams: <b>Yes</b>			
Inspection of the pretreatment facilities: <b>Yes</b>			
Review of self-monitoring records: <b>Yes</b>			
Observation of IU self-monitoring procedures: <b>N/A, IU use contract labs</b>			
Verification that approved analytical techniques are used: <b>Yes</b>			
Verification of IU flow measurement (where required): <b>Yes</b>			
6. Please describe the overall adequacy of inspection documentation: <b>Inspections are organized and thorough.</b>			
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). <b>Yes, all parameters sampled.</b>			
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? <b>Yes, certified lab used (EEG/American Interplex)</b>			
9. Are sampling and flow monitoring equipment properly			

maintained? <b>Yes, sample bottles cleaned after each use. Each IU has unique sample tube, and pH meter calibrated prior to each use.</b>
10. Is the POTW keeping proper field notes and chain of custody forms? <b>Yes</b>
11. Is the sampling location representative of the discharge to the collection system? <b>Yes</b>
12. Are sampling locations identified in POTW records? <b>Yes</b>
13. Are sampling services available in an emergency? <b>Yes</b>
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? <b>Pretreatment Coordinator tracks using Excel spreadsheet.</b>
15. <b>ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?</b> <b>Yes</b>
16. <b>IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?</b> <b>Yes, IU required sending 24-hour notice of exceedance, retest within 30 days, and results to POTW. If NOV issued, CAP is required.</b>
17. What are the POTW's procedures for following up violations? <b>NOV requires a Corrective Action Plan within 30 days of receipt. The plan is reviewed and approved by POTW.</b>
18. <b>HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?</b> <b>N/A</b>
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: <b>N/A</b>
Other environmental permits held: <b>N/A</b>
Description of operations: <b>N/A</b>
Process flow diagrams: <b>N/A</b>
Flow measurements: <b>N/A</b>
Measurements of regulated pollutants: <b>N/A</b>
Certification of compliance by the IU: <b>N/A</b>
Compliance schedule (if needed): <b>N/A</b>
19. Additional comments on the POTW's inspection and sampling procedures: <b>Procedures based on 40 CFR 403.12.</b>



**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**

Late reports: **NOV**

Unpermitted discharges: **NOV**

Slug loads or spills: **NOV**

**3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes, printed in local newspaper.**

**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:
POM	Chromium, failed to monitor	NOV	30 day
PPP	NH3-N	NOV	30 day
Tabor	Chronic Zinc	NOV	30 day

**5. Comments on the POTW's enforcement procedures: Violations had decreased since the last PCI. NOV and CAP generally correct issues; IU monetary fines have not been required.**

**F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE**

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **N/A**

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? **Yes, 2015 ordinance**

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 WWTP pretreatment program has added two facilities since the last PCI: Aqua Contour Cutting (aka ACC) and Yell County Waste Management. ACC is a categorical user. Waste Management has been permitted to haul leachate to the WWTP; however, no loads have ever been received.

The Russellville City Corp pretreatment program has, again, been through staffing changes. This makes record management difficult as each Pretreatment Coordinator has a unique method for keeping records. Records, from the time Mr. Kremers took over the program, are complete and organized. Previous records are mostly complete.

Review of IU permits show not all permits have "slug load notification" requirement. The program should consider adding this requirement to all permits during the next permit cycle.

**PRETREATMENT COMPLIANCE INSPECTION**

**IU SITE VISIT FORM**

Name of Industry: <u>Sugar Creek Foods</u>
POTW Name: <u>Russellville City Corporation</u>
Industry Contacts: <u>Larry Dilday, Dalton Van Horn</u>
Date and Time of Visit: <u>9/24/2020 at 11:20 am</u>
Description of Manufacturing Process: <u>Make soft serve frozen yogurt and ice cream.</u>
Sources of Process Wastewater: <u>Sanitation/wash down of milk tanks and flavor vats.</u>
Categorical Industry? <u>No</u>
Basis for Limits: <u>Effluent Limit Guidelines</u>
Point of Application: <u>At manhole (discharge point)</u>
Description of Pretreatment Equipment and Procedures: <u>None</u>
Spill Prevention and Solvent Management Procedures: <u>Mats over floor drains, spill program, spill kits, chemical areas separated.</u>
Sampling Location and Equipment: <u>Location at manhole at west corner of plant. No IU equipment.</u>

**PRETREATMENT COMPLIANCE INSPECTION  
IU SITE VISIT FORM**

Name of Industry:	<u>Aqua Contour Cutting (ACC)</u>
POTW Name:	<u>Russellville City Corporation</u>
Industry Contacts:	<u>Kurtie Orrick</u>
Date and Time of Visit:	<u>9/24/2020 at 12:20 pm</u>
Description of Manufacturing Process:	<u>Metal working, sheet metal cutting, bonding, welding, and powder coat paint process</u>
Sources of Process Wastewater:	<u>Power coat zirconization</u>
Categorical Industry?	<u>Yes</u>
Basis for Limits:	<u>40 CFR 433</u>
Point of Application:	<u>At manhole (discharge point)</u>
Description of Pretreatment Equipment and Procedures:	<u>pH adjustment</u>
Spill Prevention and Solvent Management Procedures:	<u>Chemical area (power coat-wet) contained within a berm</u>
Sampling Location and Equipment:	<u>Location at 4" manhole inside plant. No IU equipment.</u>

**PPETS CODE SHEET  
PRETREATMENT COMPLIANCE INSPECTION (PCI)**

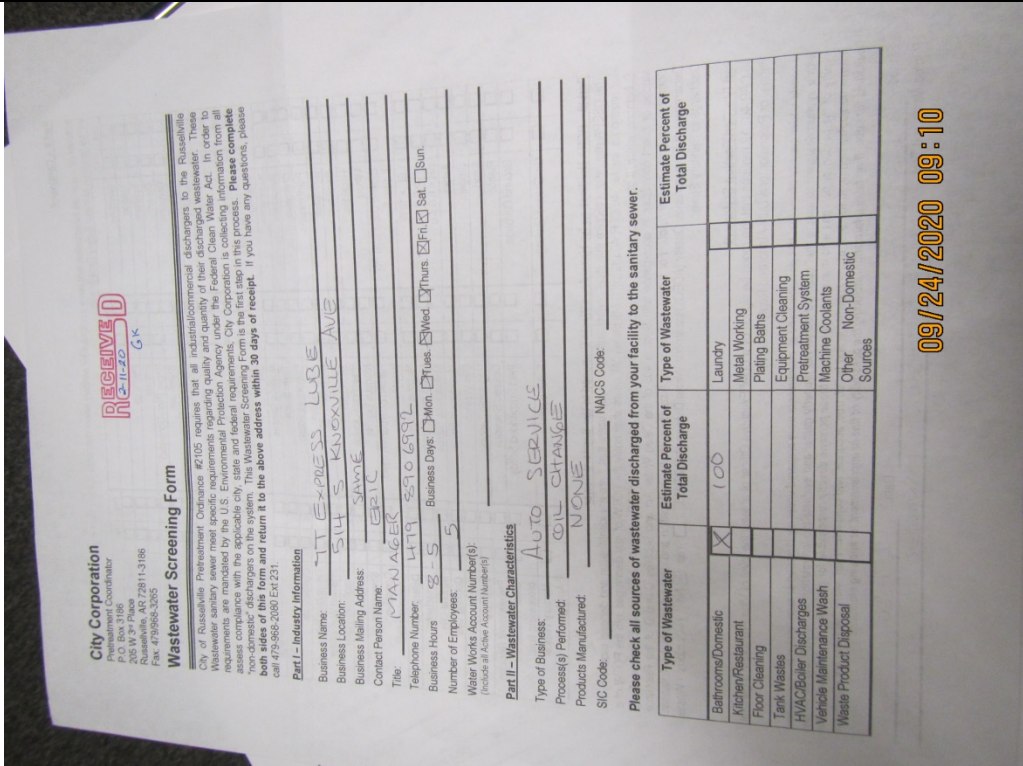
		CODE
INSPECTOR'S NAME:	<u>Amy Beck</u>	
NAME OF FACILITY:	<u>Russellville City Corp WWTP</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR021768</u>	NPID
DATE OF PCI:	<u>September 24, 2020</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>15</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>4</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0 (2019)</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>3</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

**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Russellville City Corporation</b>		
Photographer:	<b>Amy Beck</b>	Date:	<b>September 24, 2020</b>
Witness:	<b>N/A</b>	Time:	<b>910</b>
Description:	<b>Example of screening form sent to local industries.</b>		



Photographer:	<b>Amy Beck</b>	Date:	<b>September 24, 2020</b>
Witness:	<b>N/A</b>	Time:	<b>1025</b>
Description:	<b>Composite sampler used by the pretreatment program.</b>		





**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Russellville City Corporation</b>				
Photographer:	<b>Amy Beck</b>	Date:	<b>September 24, 2020</b>	Time:	<b>1028</b>
Witness:	<b>N/A</b>			Photo #:	<b>3</b>
Description:	<b>Separate sample tubing is maintained for each IU.</b>				



Photographer:	<b>Amy Beck</b>	Date:	<b>September 24, 2020</b>	Time:	<b>1027</b>
Witness:	<b>N/A</b>			Photo #:	<b>4</b>
Description:	<b>Sample bottles kept on-hand.</b>				

