



September 21, 2021

Ken Johnson, General Manager
Pine Bluff Wastewater Utility
1520 South Ohio Street
Pine Bluff, AR 71601

RE: Pine Bluff Wastewater Utility Pretreatment Inspection (Jefferson Co)
AFIN: 35-00149 **NPDES Permit No.: AR0033316**

Dear Mr. Johnson:

On July 1, 2021, 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 inspection report for any comments.

If I can be of any assistance please contact me at youngm@adeq.state.ar.us or (501) 837-2073.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Young'.


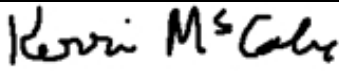
Michael Young
Inspector, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

 <p>ENVIRONMENTAL QUALITY</p>	OFFICE OF WATER QUALITY INSPECTION REPORT		
	AFIN: 35-00149	PERMIT #: AR0033316	DATE: 7/1/2021
	COUNTY: 35 Jefferson	PDS #: 117523	MEDIA: WN
	GPS LAT: 34.271574 LONG: -91.972425 LOCATION: Entrance		
FACILITY INFORMATION		INSPECTION INFORMATION	
NAME: Pine Buff Wastewater Utility LOCATION: 900 Island Harbor Marina Road CITY: Pine Bluff, AR 71601		FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 101531 S - State FACILITY EVALUATION RATING: 5 - Satisfactory INSPECTION TYPE: Pretreatment Compliance	
RESPONSIBLE OFFICIAL		DATE(S): ENTRY TIME: EXIT TIME: PERMIT EFFECTIVE DATE: 7/1/2021 10:10 14:38 7/1/2015 PERMIT EXPIRATION DATE: 6/30/2020	
NAME: / TITLE Ken Johnson / General Manager COMPANY: Pine Bluff Wastewater Utility MAILING ADDRESS: 1520 South Ohio Street CITY, STATE, ZIP: Pine Bluff AR 71601 PHONE & EXT: / FAX: 870-535-6603 / 870-535-6243 EMAIL: ken@pbwastewater.com		FAYETTEVILLE SHALE RELATED: *** FAYETTEVILLE SHALE VIOLATIONS: ***	
CONTACTED DURING INSPECTION: No		INSPECTION PARTICIPANTS	
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Vincent Miles/Superintendent/870-535-6603/Vincent@pbwastewater.com Stacey Carpenter/Senior Technician Boyd Point Brittanie Gloyd/ADEQ OWQ D8 Inspector Trey Butler/ADEQ OWQ D7 Inspector	
AREA EVALUATIONS			
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)			
**	PERMIT	**	FLOW MEASUREMENT
**	RECORDS/REPORTS	**	LABORATORY
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL
**	OTHER:	S	PRETREATMENT
SUMMARY OF FINDINGS			
<p>No violations observed at the time of inspection.</p>			

GENERAL COMMENTS

This inspection consisted of an evaluation of the pretreatment program associated with the Pine Bluff Wastewater Utility – Boyd Point WWTF. Pine Bluff Wastewater Utility manages a pretreatment program in which categorical and non-categorical significant industrial users (SIU) are permitted, inspected, and sampled to maintain compliance of the discharge from the SIU to the Boyd Point WWTF. Currently, Pine Bluff Wastewater Utility manages a pretreatment program with eleven SIU and four of those are categorical industries. A review of the pretreatment permit, inspection forms, and the last annual report submitted were reviewed to ensure that the program has had no major changes. Vincent Miles, Boyd Point WWTF Superintendent, stated that there had been no major changes following the previous inspection. Mr. Miles did mention that they may lose one industry in the program and add another one, and that he would inform DEQ of any changes to the program. Mr. Miles explained that they have a very good working relationship with all industries. Inspections are performed by Boyd Point WWTF staff in which some are performed unannounced, but most are announced. All sampling and analyses are conducted by Boyd Point WWTF. I reviewed the inspection forms and they contained all the required information. Annual reports are submitted each year by the due date and they contained all the required information. During the visit to Tyson Foods, Inc. and US Steel, I observed a very good working relationship between the industry and the wastewater treatment facility with Mr. Miles being extremely familiar with the working components of the pretreatment equipment. This program is run extremely well and efficiently.

Note: This inspection report replaces the inspection conducted on July 18, 2019 in which no report was drafted. Any issues noted during the 2019 inspection are resolved with this inspection.

INSPECTOR'S SIGNATURE:  Michael Young	DATE: 8/6/2021
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 9/20/2021

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

Name of Municipality: Pine Bluff Wastewater Utility
AFIN Number: 35-00149
NPDES Permit Number(s): AR0033316
Program Tracked under NPDES Permit Number: AR0033316
Fact Sheet Preparation Date: N/A
Date of Last PCI/Audit: 1/8/2015
Date of Last Annual Report: 3/25/2020
Name of Inspector: Michael Young
Date PCI Performed: 07/01/2021
Name and Title of Facility Representative: Vincent Miles, Plant Superintendent, (870) 535-0828
Name and Title of Other Participants: Stacey Carpenter, Senior Lab Technician
Number of IUs Visited: 2
Name(s) of IUs Visited: Tyson Foods, U.S. Steel
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.

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:		Sampling Frequency		Permit Requirement		Program Requirement
Metals:						
Influent:		2/month		1/qtr		1/qtr
Effluent:		2/month		1/qtr		1/qtr
Sludge:		quarterly		none		None
Organics:						
Influent:		Annually		Annually		Annually
Effluent:		Annually		Annually		Annually
Sludge:		Annually		none		none
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?						
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?
11
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? List the section of the permit each item is listed under.
An expiration date: Yes
Discharge limitations: Yes
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: N/A
IU reporting requirements: N/A
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: 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

<u>D. MONITORING OF IUS BY POTW</u>			
1. Indicate current inspection and sampling frequency and program requirement below.			
		Current frequency:	Program Requirements:
Sampling:			
	Categorical IUs	> 1/month	Monthly
	Other SIUs	> 1/month	Monthly
	Non-SIUs	n/a	
Inspection:			
	Categorical IUs	Annually	Annually
	Other SIUs	Annually	Annually
	Non-SIUs	n/a	n/a
Comments:			
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): n/a			
6. Please describe the overall adequacy of inspection documentation:			
Drafting a new inspection form			
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?
Data system is on computer database.
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?
No self-monitoring.
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?
Offer to split sample, discuss options for surcharge or improvements
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: None

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?
Yes
3. Does the POTW have copies of permits for IUs in other cities?
No
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:

H. EVALUATION AND COMMENTS

Boyd Point Wastewater Facility has adequate staffing that is extremely knowledgeable about pretreatment processes. Sampling and analysis of samples is performed by the Boyd Point Wastewater Facility staff and there are very few issues with the facilities keeping compliance. There is a very good relationship between the WWTF and the industry as observed during the Industrial User visits.

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: <u>Tyson Foods, Inc.</u>
POTW Name: <u>Boyd Point Wastewater Facility</u>
Industry Contacts: <u>Gary Farrer, Wastewater Operator</u>
Date and Time of Visit: <u>July 1, 2021 at 13:30</u>
Description of Manufacturing Process: <u>Poultry processing</u>
Sources of Process Wastewater: <u>Cooked poultry</u>
Categorical Industry? <u>No</u>
Basis for Limits: <u>N/A</u>
Point of Application: <u>N/A</u>
Description of Pretreatment Equipment and Procedures: <u>Chemical addition and Dissolved Air Flotation (DAF)</u>
Spill Prevention and Solvent Management Procedures: <u>Yes</u>
Sampling Location and Equipment: <u>Yes</u>

**PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM**

Name of Industry: <u>US Steel – Wheeling Machine Products</u>
POTW Name: <u>Boyd Point WWTF</u>
Industry Contacts: <u>Joey Crow</u>
Date and Time of Visit: <u>07/01/2021; 14:01</u>
Description of Manufacturing Process: <u>Electroplating and Metal Finishing</u>
Sources of Process Wastewater: <u>Metal Finishing</u>
Categorical Industry? <u>Yes</u>
Basis for Limits: <u>CFR</u>
Point of Application: <u>N/A</u>
Description of Pretreatment Equipment and Procedures: <u>Settlement, flocculation, chemical addition</u>
Spill Prevention and Solvent Management Procedures: <u>Yes</u>
Sampling Location and Equipment: <u>Yes</u>

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

		CODE
INSPECTOR'S NAME:	<u>Michael Young</u>	
NAME OF FACILITY:	<u>Boyd Point WWTF</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0033316</u>	NPID
DATE OF PCI:	<u>July 1, 2021</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>11</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