



August 28, 2023

Mr. Dan Dawson, General Manager Searcy Board of Public Utilities P.O. Box 1319 Searcy, AR 72145 Sent Via Email To <u>d.dawson@searcywater.org</u>

RE: Searcy WWTF Inspection AFIN: 73-00055 Permit No.: AR0021601

Dear Mr. Dawson:

On August 23 and 24, 2023, 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 and Industrial User inspections are 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 <u>Jason.Bolenbaugh@adeq.state.ar.us</u> or 501-682-0659.

Sincerely,

Ann Klalinbarg

Jason Bolenbaugh Compliance Branch Manager, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118

CC: Jimmy Smith, Manager, Searcy WWTP, j.smith@searcywater.org Brady Anderson, PT Coordinator, Searcy WWTP, <u>b.anderson@searcywater.org</u>

ver ver	ENVIRONMENTAL QUALITY	OFFICE OF WATER QUALITY INSPECTION REPORT						
(AFIN: 73-00055 PERMIT #: AR00216		1601		DATE: 8/23/2023		
0.7		COUNTY: 73 Wh	ite	PDS ;	#: 126679	MEDIA: WN		
		GPS LAT: 35.267	294 LONG: -91.71	4 LONG: -91.715535 LOCATION: Entrar				
	FACILITY INFORMAT	ION	IN	INSPECTION INFORMATION				
NAME Sea	arcy WWTF		FACILITY TYPE: 1 - Municipal	1232	ector id#: 3247 S - State			
	00 HWY 13		4 - Satisfactory	FACILITY EVALUATION RATING: INSPECTION TYPE: 4 - Satisfactory Pretreatment Compliant				
Se	arcy		()	NTRY TIME:	EXIT TIME: 14:35	PERMIT EFFECTIVE DATE: 5/1/2019		
	RESPONSIBLE OFFIC			8:00	10:30	DI 172019 PERMIT EXPIRATION DATE:		
	. Dan Dawson / General Manage	,				4/30/2024		
COMP	PANY:		FAYETTEVILLE	FAYETTEVILLE SHALE RELATED: N				
	arcy Board of Public Utilities		FAYETTEVILLE	SHAL	E VIOLATIO	ONS: N		
	D. Box 1319				FION PART	ICIPANTS		
CITY, STATE, ZIP: Searcy AR 72145 PHONE & EXT: / FAX: 501-268-2481 / EMAIL:			Jimmy Smith, I Brady Anderso	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Jimmy Smith, Manager, Searcy WWTF Brady Anderson, PT Coordinator, Searcy WWTF Nathan Spencer, Operator, Searcy WWTF				
00	NTACTED DURING INSPECTION:							
AREA EVALUATIONS (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)								
**	PERMIT	** FLOW MEAS		**	STORMW			
**	RECORDS/REPORTS	** LABORATOR		**	FACILITE SITE REVIEW			
**	OPERATION & MAINTENANCE		RECEIVING WATER		** SELF-MONITORING PROG			
	SAMPLING	** SLUDGE HA	NDLING/DISPOSAL	S	PRETREA	AIMENT		
**	OTHER:							

SUMMARY OF FINDINGS

No violations were noted at the time of the inspection. However, after reviewing the May 2023 sampling data from Turkey Hill, LLC, it was determined the facility had discharged a slug load of BOD and TSS to the collection system without providing notification, even after receiving the sample analyses that were in excess of 40,000 mg/l each. A surcharge had already been provided to the facility but no contact was made until the inspection on August 24, 2023. The Searcy WWTF pretreatment staff did notify Turkey Hill, LLC staff that a Notice of Violation would be sent to them. Turkey Hill, LLC indicated they will continue to evaluate operational records to try and determine what may have caused the excessive discharge of BOD and TSS. It was recommended at that time the Searcy WWTF pretreatment staff and the Turkey Hill, LLC operations staff discuss a limit that may constitute a slug load so appropriate reporting can be made.

No Baseline Monitoring Report for Danfoss Power Solutions II, Inc. was available for review nor was one available for Eaton during the previous PCI in February, 2019. It is recommended a BMR be submitted by the permittee.

GENERAL	COMMENTS

I appreciate the assistance from Mr. Jimmy Smith, Mr. Brady Anderson, and Mr. Nathan Spencer. They provided an abundance of documentation upon request, provided an office space for review, and were knowledgeable of the pretreatment program and their permittees.

Please be mindful that a second permit expiration letter was submitted to the Searcy Board of Public Utilities on August 2, 2023. A complete renewal application must be received by the DEQ no later than November 2, 2023.

INSPECTOR'S SIGNATURE:	←Click text to left to add signature	-Inspector Name	DATE:
SUPERVISOR'S SIGNATURE	Jan Redenbrag	ason Bolenbaugh	DATE: 8/25/2023

DIVISION OF ENVIRONMENTAL QUALITY PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Searcy Board of Public Utilities

AFIN Number: 73-00055

NPDES Permit Number(s): AR0021601, ARR00C389

Program Tracked under NPDES Permit Number: AR0021601

Date of Last PCI/Audit: 2/4/2019 - 2/5/2019 (PCI)

Date of Last Annual Report: 5/19/2023

Name of Inspector: Jason Bolenbaugh

Date PCI Performed: 8/23/2023 - 8/24/2023

Name and Title of Facility Representative: Jimmy Smith, Manager - Searcy Waste Water Treatment Plant

Name and Title of Other Participants: Brady Anderson, Pretreatment Coordinator Nathan Spencer, Class I Operator

Number of IUs Visited: 2

Name(s) of IUs Visited: Turkey Hill, LLC Danfoss Power Solutions II, 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. 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.

Danfoss Power Solutions II, Inc. purchased Eaton, and B Quick Truck & Trailer Wash has been added since the last inspection.

2. Has ADEQ or EPA been notified of these changes? Yes

3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes, the survey is submitted to each permittee during the permit renewal or application process.

4. What procedures are being used to update the IU Survey? During permit renewal an IU survey is required. A minor revision may have occurred recently.

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): **10**

6. Number of Categorical Industrial Users: 1

7. How does the POTW determine the appropriate categorical standards to apply to an IU? **40 CFR 433**

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:
Danfoss Power	Metal Finishing	Electroless Nickel
Solutions		Process

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	Permit	Program					
	Frequency	Requirement	Requirement					
Metals:								
Influent:	4	4	4					
Effluent:	4	4	4					
Sludge:	4	4	4					
Organics:								
Influent:	1	1	1					
Effluent:	1	1	1					
Sludge:	1	1	1					
Comments: In 2022, metals samples were collected on March 18,								
May 20, September 2, and October 14.Organics were collected on								
March 18. Composite sample was collected from 0745 on March 17								
to 0800 on 1	March 18. Sampl	es received on ice	e at 3.8°C.					
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? No upsets have occurred.								

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? A permit is issued to each industrial user.

2. How many IU permits (or other control documents) have been issued? 11-(Danfoss Power Solutions II, Inc. is the only Categorical IU).

3. DO ALL <u>SIGNIFICANT</u> <u>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, all permits were effective on March 16, 2023 and expire on March 15, 2026.

4. Does the control document contain the following items? List the section of the permit each item is listed under. A review of Turkey Hill, LLC was used to answer the below sections. An expiration date: 3/15/2026 (effective date: 3/16/2023) Discharge limitations: BOD - 225 mg/l Max Concentration (24 hr. period) TSS - 225 mg/l Max Concentration (24 hr. period) Oil & Grease - 100 Max Concentration (24 hr. period) PH - Between 5.0 and 11.0 SU Exceedances of BOD, TSS, and O&G do not constitute a permit violations. Rather exceedances of those parameters are handled under Ordinance #679 in which surcharges are given to the respective IU.

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: Part 1 - Twice/month

IU reporting requirements: Part 3.B - last day of the month in which the monitoring period ended. The monitoring period is from the 16^{th} of the month to the 15^{th} of the following month.

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: Part 1 - manhole in Spring St. on the east side of the facility near the security entrance.

Type of sample: Part 1 - BOD and TSS are composite samples and O&G and pH are grab samples.

Monitoring frequency: Part 1 - BOD, TSS, pH and O&G are					
2/month. Part 3.P notes at a minimum flow will be monitored at					
the same frequency as pH.					
Bypass prohibition: Part 3.I					
Right of entry: Part 3.H					
Non-transferability: Part 3.L					
Revocation clause: Part 3.N					
Penalty Provisions: Part 3.N					
Slug load notification: Part 3.G					
Notification of process change: Part 3.K					

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below.

	Current frequency:	Program Requirements:
Sampling:		
Categorical IUs	2	Annual
Other SIUs	2	Annual
Non-SIUs	2	Annual

Inspection:		
Categorical IUs	1	Annual
Other SIUs	1	Annual
Non-SIUs	1	Annual

Comments: Inspections and monitoring are completed in accordance with the requirements.

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? All have been inspected on an annual basis. Most inspections occurred in October and November, 2022.

3. Are inspections announced or unannounced? Typically announced so they know the pretreatment operator would be available. Some listed pretreatment operators are not located in the area.

4. Are records kept of each inspection? Yes. A review of the Turkey Hill, LLC inspection report from 11/8/2022 was used to answer the below sections.

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: 11/8/2022

Officials present: Spencer Oyemaja and Brady Anderson (Searcy) and Richard Taylor (Turkey Hill, LLC).

Inspection of chemical storage areas:

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Wash down of ice cream equipment, tanker trucks, boiler blow down, floors, and sanitary waste.

Inspection of the pretreatment facilities: Yes.

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: N/A. Turkey Hill does not have a pretreatment system and Arkansas Testing does all effluent monitoring.

Verification that approved analytical techniques are used: Yes Verification of IU flow measurement (where required): Yes, data is recorded by Arkansas Testing during sample collection. The IU does not record flow. 6. Please describe the overall adequacy of inspection documentation: The inspections are thorough and efficiently evaluates the facilities pretreatment requirements.

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, but the POTW will analyze pollutants such as BOD, TSS, O&G, and pH while sending metals analysis to Arkansas Testing Laboratories at 3301 Langley Dr. Searcy.

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? **Yes**

9. Are sampling and flow monitoring equipment properly maintained? Could not evaluate at the time of the inspections.

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? ${\bf Yes}$

12. Are sampling locations identified in POTW records? Yes

13. Are sampling services available in an emergency? The POTW can sample if needed, but these services haven't been required. Additionally, Arkansas Testing Laboratories is located in Searcy and as a requirement of the IUs, all sampling is conducted by Arkansas Testing Laboratories. If emergency sampling is required the IU can contact Arkansas Testing Laboratories.

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? The POTW maintains individual files for each IU and the records that are submitted or correspondence that is sent. Mr. Anderson assumed the pretreatment coordinator position this year and is attempting to move to more electronic submissions and correspondence through email.

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, not many violation have occurred but the POTW is going to send Notice of Violations for recent slug (Turkey Hill, LLC) and pH (B Quick Truck and Trailer Wash) violations.

17. What are the POTW's procedures for following up violations? With recent issuances of Notice of Violations the POTW will require written corrective action plans within 30 calendar days.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? A BMR cannot be located for the former Eaton plant that is now Danfoss Power Solutions II, Inc.

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR. Because a BMR could not be located and Danfoss was not required to submit one this section could not be evaluated.

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: **None**

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1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Under Ordinance 2011-9, Section 28-35, the POTW outlines varying types of enforcement actions that can be taken such as: Notification of Violation, Consent Orders, Show Cause Hearing, Compliance Orders, Cease and Desist Orders, Administrative Fines, Emergency Suspensions, and Termination of Discharge. Section 28-36 also outlines judicial enforcement remedies.

2. How does the POTW respond to the following violations? The POTW does have an Enforcement Response Plan.

Effluent limitations: Notice of Violation (NOV), resample, fine Late reports: Email notification, phone call, NOV

Unpermitted discharges: NOV, site visit, phone call, letter, fine Slug loads or spills: NOV, phone call, letter/email, fine, surcharge, permit revocation

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)? It would be but a review of annual reports from 2017 to current did not reveal any IU to be in Significant Non-Compliance status.

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:		
None					

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? Yes. Mr. Jimmy Smith is the manager of the POTW and oversees the pretreatment program. Mr. Brady Anderson is the pretreatment coordinator. Mr. Nathan Spencer is a Class I operator that is also part of the pretreatment program.

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? **Not applicable**

3. Does the POTW have copies of permits for IUs in other cities? Not applicable

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? **Not applicable**

5. Comments on multijurisdictional issues: None

PRETREATMENT COMPLIANCE INSPECTION IU SITE VISIT FORM

Name of Industry: Danfoss Power Solutions II, Inc.

POTW Name: Searcy Board of Public Utilities

Industry Contacts: Mr. Kevin Caldwell, EHS Manager; Mr. Richard Roark, EHS Analyst; Mr. Kenneth Waller, EHS Lead

Date and Time of Visit: 8/24/2023 @ 0800

Description of Manufacturing Process: From the Toxic Organic Management Plan (TOMP): Industrial processes include: machining, heat treating, grinding, surface coating such as solvent based acrylic painting, automated electrostatic catalyzed painting, electro-less nickel plating, hot black phosphate coating, cold black phosphate coating, and steam oxide. The plant also has part cleaning and degreasing operations.

Sources of Process Wastewater: Rinse water from plating overflows, parts wash water, batch processing of plating rinse, spent machine coolants, mop and cleaning, sanitary waste, spent nickel bath, and cold and hot blackening (from POTW inspection).

Categorical Industry? Yes

Basis for Limits: 40 CFR 433

Point of Application: Pretreatment Facility

Description of Pretreatment Equipment and Procedures: Wastewater from the production area and paint line accumulation tank drain into a 4,000 gallon wastewater tank where an oil skimmer removes excess oil from the water surface. Wastewater from the nickel plating line drains directly to a 6,000 gallon equalization tank. All wastewater eventually flows through the 6,000 equalization tank to be processed through the MEMTEK Treatment System. Throughout the treatment process the wastewater is filtered, pH is adjusted by lowering and raising in reaction tanks, and solids are removed through sludge presses.

Spill Prevention and Solvent Management Procedures: All facility wastewater from the production area will flow to the pretreatment system. The pretreatment system and chemical storage area is within a pit that will contain any spills. The hazardous waste storage area in outside of the main plant and all materials are in a small building in which the floor is much lower than the entrance so all materials are stored in secondary containment and cannot flow outside if spilled. Another chemical storage are for flammable liquids is outside in another structure with secondary containment and fire extinguishing mechanisms. Spill kits are available.

Sampling Location and Equipment: A composite sampler is set next to the sampling port and effluent tank immediately prior to discharging to the POTW's collection system. The area is easily accessible. Arkansas Testing Laboratories will bring in a composite sampler when sampling is needed.

PRETREATMENT COMPLIANCE INSPECTION IU SITE VISIT FORM

Name of Industry: Turkey Hill, LLC (Searcy)

POTW Name: Searcy Board of Public Utilities

Industry Contacts: Richard Taylor, Quality Manager

Date and Time of Visit: 8/24/2023 @ 0940

Description of Manufacturing Process: Manufacturing process includes mixing, pasteurization, and freezing and packaging of dairy products.

Sources of Process Wastewater: Washing down of ice cream manufacturing equipment, tanker trucks, boiler blowdown, and sanitary waste.

Categorical Industry? No

Basis for Limits: Local Limits

Point of Application: The facility does not have a pretreatment system. All wastewater leaves the facility via floor drains and flows to a manhole located on Spring St. directly east of the facility.

Description of Pretreatment Equipment and Procedures: No pretreatment system is in place at this facility. Wastewater flows directly into production area floor drains and to the POTW's collection system. The manhole directly east of the facility's main entrance on Spring St. is the location where a composite sampler is stationed for sampling.

Spill Prevention and Solvent Management Procedures: The POTW acknowledged a spill response plan is in place for the facility. The facility does not have a solvent management plan.

Sampling Location and Equipment: All sampling is conducted from the Spring St. manhole directly east of the facility. No sampling was being conducted by Arkansas Testing Laboratories at the time of the inspection.

PPETS CODE SHEET PRETREATMENT COMPLIANCE INSPECTION (PCI)

INSPECTOR'S NAME:Jason BolenbaughNAME OF FACILITY:Searcy Board of Public UtilitiesPERMIT NUMBER USED
TO TRACK PROGRAM:AR0021601NPIDDATE OF PCI:8/23/2023-8/24/2023

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	10	SIUS
NUMBER OF CATEGORICAL IUS:	1	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	All	NOIN
SIUS WITHOUT CONTROL MECHANISM:	None	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	None	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	None	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	None	SNIN

CODE