



**DIVISION OF  
ENVIRONMENTAL  
QUALITY**

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

December 7, 2023

Mr. Russell Skinner, Plant Manager  
Kohler Company  
415 S. Oklahoma St.  
Sheridan, AR 72150  
Email Address: [Russell.Skinner@kohler.com](mailto:Russell.Skinner@kohler.com)

RE: Kohler Company Inspection – PDS# 127041  
AFIN: 27-00022 Permit No.: AR0034347

Dear Mr. Skinner:

On August 17, 2023, I performed an Industrial User 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 [Jason.Bolenbaugh@adeq.state.ar.us](mailto:Jason.Bolenbaugh@adeq.state.ar.us) or 501-682-0659.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Bolenbaugh'.

Jason Bolenbaugh  
Compliance Branch Manager, Office of Water Quality

CC: LeKeisha Adams, EHS Program Manager, [Lekeisha.Adams@kohler.com](mailto:Lekeisha.Adams@kohler.com)

 <p><b>ENVIRONMENTAL QUALITY</b></p>	<b>OFFICE OF WATER QUALITY INSPECTION REPORT</b>				
	AFIN: 27-00022	PERMIT #: AR0034347	DATE: 8/17/2023		
	COUNTY: 27 Grant	PDS #: 127041	MEDIA: WN		
	GPS LAT: 34.302207 LONG: -92.393639 LOCATION: Entrance				
<b>FACILITY INFORMATION</b>		<b>INSPECTION INFORMATION</b>			
NAME: <b>Kohler Company</b> LOCATION: <b>415 S. Oklahoma St.</b> CITY: <b>Sheridan</b>		FACILITY TYPE: <b>2 - Industrial</b> INSPECTOR ID#: <b>83321 S - State</b> FACILITY EVALUATION RATING: <b>4 - Satisfactory</b> INSPECTION TYPE: <b>Industrial User</b>			
<b>RESPONSIBLE OFFICIAL</b>		DATE(S):      ENTRY TIME:      EXIT TIME:      PERMIT EFFECTIVE DATE: <b>8/17/2023      09:30      10:48</b>			
NAME: / TITLE <b>Mr. Russell Skinner / Plant Manager</b> COMPANY: <b>Kohler Company</b> MAILING ADDRESS: <b>415 S. Oklahoma St.</b> CITY, STATE, ZIP: <b>Sheridan AR 72150</b> PHONE & EXT: / FAX: <b>870-942-2111 46201 /</b> EMAIL: <b>Russell.Skinner@kohler.com</b> CONTACTED DURING INSPECTION: <b>Yes</b>		PERMIT EXPIRATION DATE:  FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>			
		<b>INSPECTION PARTICIPANTS</b>			
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>LeKeisha Adams, EHS Program Manager, Kohler Co.</b> <b>Anthony Butler, Sr. Chemical Lab Technical Supervisor, Kohler Co.</b> <b>Eric Lites, EHS Associate Specialist, Kohler Co.</b> <b>Robert Diaz, Inspector, DEQ-OWQ</b>			
<b>AREA EVALUATIONS</b> <small>(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)</small>					
**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	<b>S</b>	PRETREATMENT
**	OTHER:				


<b>SUMMARY OF FINDINGS</b>
<p><b>Kohler Company (Kohler) is an industrial user (IU) that discharges process wastewater to the City of Sheridan's Publicly Owned Treatment Works (POTW). The POTW is permitted under NPDES Permit AR0034347. Kohler is monitored by the Office of Water Quality under Pretreatment Tracking Number ARP000021. No violations were noted during the inspection. The following notes were made during the inspection and document review:</b></p> <ul style="list-style-type: none"> <li>• <b>The Baseline Monitoring Report (BMR) on file was completed in 2002. Since then the facility has had changes in the metal finishing processes and may need to revise the BMR accordingly. For example, the facility no longer has a brazing activity within their process as it stopped in the early 2000's.</b></li> <li>• <b>There are no floor drains in the production and chemical storage areas. The chemical storage area is within secondary containment. Kohler has a current spill response plan in place. Floor drains do exist in the wastewater treatment facility but the area is in secondary containment and any spills from the wastewater treatment facility will be routed to the Emergency Tank (Tank #33). The facility does have a wastewater spill and exposure plan in place that addresses how to address acid spills, base spills, organic spills, solid waste, and strong odors.</b></li> <li>• <b>Once per week sludge is pumped to the sludge tank. The wastewater treatment process does generate a hazardous waste sludge (i.e. filter cake) that is filter pressed. The sludge, paint waste, and other liquid hazardous waste are hauled away by Safety-Kleen Systems, Inc. to be disposed of at Clean Harbors.</b></li> <li>• <b>pH measuring probes are calibrated one to two times per week. Flow meters are rotated every six</b></li> </ul>

months to receive calibration checks. pH is adjusted prior to discharge from the facility into the City of Sheridan's collection system. The wastewater treatment system is automated with alarms set for pH and if an alarm is triggered due to pH issues then wastewater flows cease and cannot proceed to the next step in wastewater treatment.

- Kohler had submitted a permit renewal application to the City of Sheridan. They were under a current permit which was to expire on September 30, 2023. Under the permit Kohler is required to record flow once per day; sample pH, O&G, Cadmium, Chromium, Copper, Lead, Nickel, Silver, and Zinc once per month; and, Total Cyanide and TTO twice per year. With exception of Flow, pH, and O&G, the remaining pollutants are required to be sampled under 40 CFR 433. A review of the January – June 2023 report did not reveal any exceedances of maximum daily concentrations for the 40 CFR 433 pollutants. The sample Chain of Custody was complete and samples were analyzed by Arkansas Analytical, Inc.

**GENERAL COMMENTS**

The Kohler is a Categorical IU regulated under 40 CFR 433 for metal finishing. The predominant industrial activity is organic plating, with metal as the main raw material. The finishing process consists of plating tanks and a clear coat application. The plating tanks consists of one soak clean tank, one electroclean tank, two chrome strip tanks, two acid activator tanks, one watts-nickel tank, one acid copper tank, and one chrome passivation tank. The facility processes that generate process wastewater include cleaning, pretreatment, surface preparation and plating, and physical vapor deposition (PVD) of brass, stainless steel, and other chrome plated substrates (zinc and plastic). Approximately 50,000 gallon per day of process wastewater is generated from the facility and discharged to the City of Sheridan.

INSPECTOR'S SIGNATURE:	←Click text to left to add signature	<b>-Inspector Name</b>	DATE:
SUPERVISOR'S SIGNATURE:		<b>Jason Bolenbaugh</b>	DATE: <b>12/6/2023</b>

Industrial Site Visit

Industry Contacts: Ms. Lekeisha Adams, EHS Program Manager

Type of Industry: Metal Finishing (40 CFR 433)

- |     |  |   |                             |                              |
|-----|--|---|-----------------------------|------------------------------|
| 1.  | Significant industrial user:                       | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 2.  | Pretreatment equipment or procedures?              | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 3.  | Pretreatment equipment maintained and operational? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 4.  | Hazardous waste generated or stored?               | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 5.  | Proper solid waste disposal?                       | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 6.  | Solvent management/TTO control?                    | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 7.  | Suitable sampling location?                        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 8.  | Appropriate self-monitoring procedures/equipment?  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 9.  | Adequate spill prevention?                         | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 10. | Industry familiar with limits and requirements?    | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |

**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Kohler Company</b>		
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>09:57</b>	Photo #:	<b>1</b>
Witness:			
Description:	<b>DSCN6285: Rinse tanks for nickel, Acid/Alkaline (A/A), copper and chrome (Tanks 001-004).</b>		



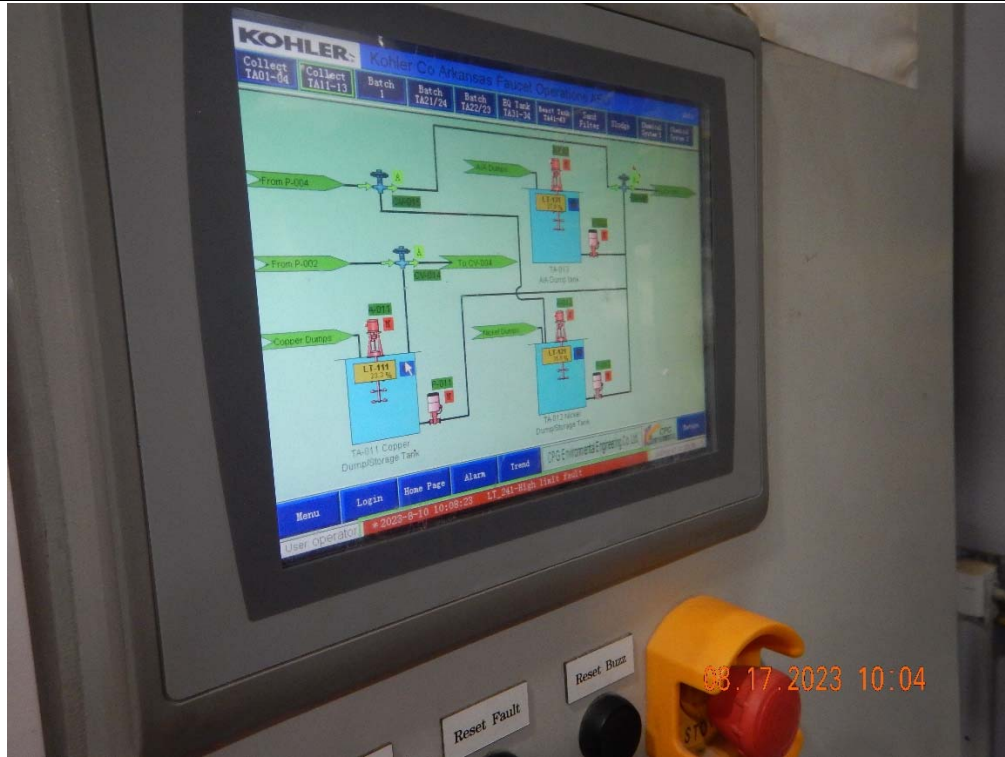
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>09:59</b>	Photo #:	<b>2</b>
Witness:			
Description:	<b>DSCN6287: Inside of the copper rinse tank (Tank 002).</b>		





**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Kohler Company</b>		
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Witness:		Time:	<b>10:04</b>
		Photo #:	<b>3</b>
Description:	<b>DSCN6289: Operations screen for the nickel, A/A, and copper dump tanks (Tanks 011-013).</b>		



Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Witness:		Time:	<b>10:06</b>
		Photo #:	<b>4</b>
Description:	<b>DSCN6290: Chrome dump tank (Tank 21).</b>		



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Kohler Company</b>		
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>10:08</b>	Witness:	
Photo #:	<b>5</b>	Description:	<b>DSCN6292: Chrome reduction tank (Tank 41).</b>



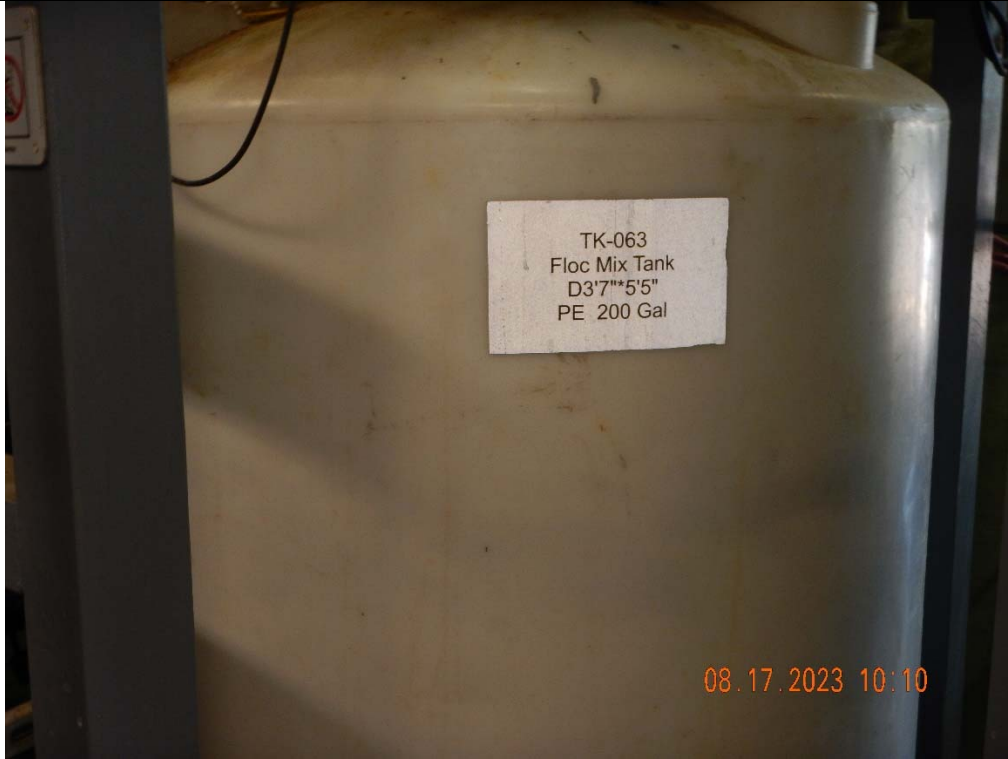
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>10:10</b>	Witness:	
Photo #:	<b>6</b>	Description:	<b>DSCN6297: pH adjustment tank (Tank 042).</b>





Office of Water Quality Photographic Evidence Sheet

Location:	<b>Kohler Company</b>				
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>	Time:	<b>10:10</b>
Witness:				Photo #:	<b>7</b>
Description:	<b>DSCN6298: Floc mix tank at clarifier.</b>				



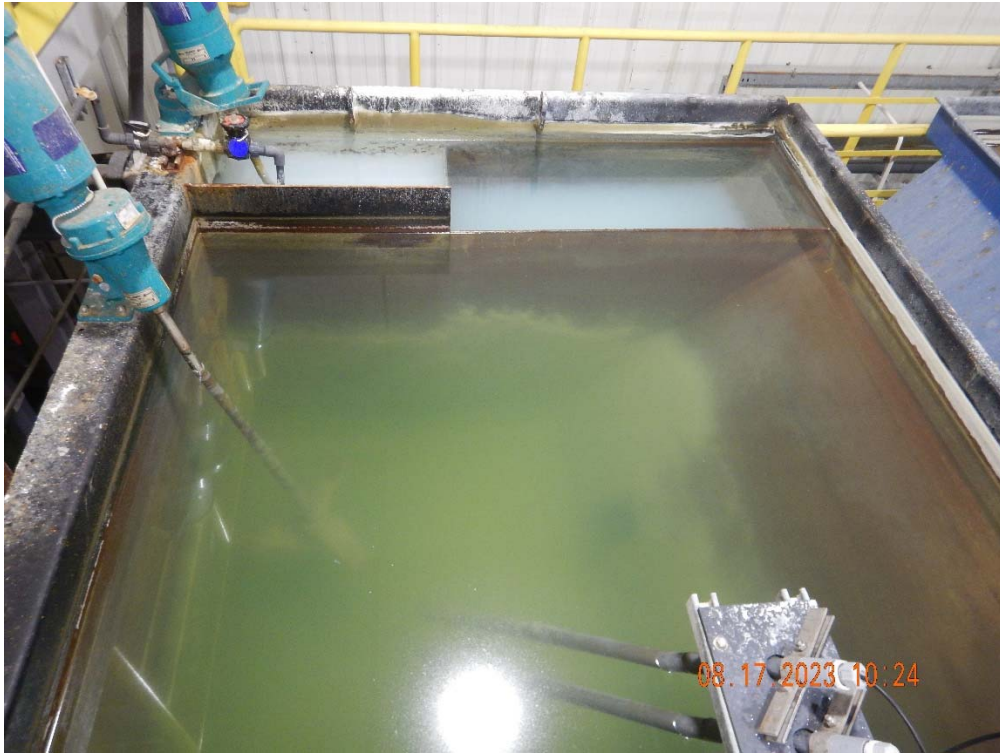
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>	Time:	<b>10:17</b>
Witness:				Photo #:	<b>8</b>
Description:	<b>DSCN6302: Stages 1 and 2 of the clarifier.</b>				



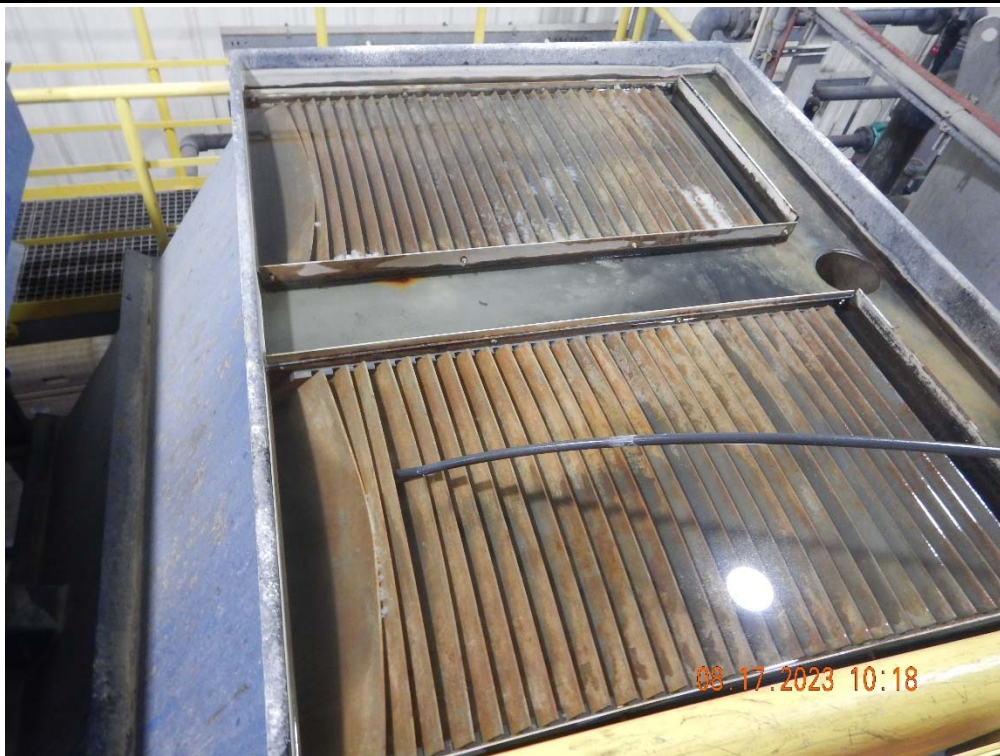


**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Kohler Company</b>		
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>10:24</b>	Witness:	
Photo #:	<b>9</b>	Description:	
<b>DSCN6308: Another view of the clarifier during solids settling.</b>			



Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>10:18</b>	Witness:	
Photo #:	<b>10</b>	Description:	
<b>DSCN6304: Clarifier at the discharge point prior to final pH adjustment and ultimate discharge to the City of Sheridan's collection system.</b>			



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Kohler Company</b>		
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>10:26</b>	Witness:	
Photo #:	<b>11</b>	Description: <b>DSCN6310: Final pH adjustment tank.</b>	



Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>10:26</b>	Witness:	
Photo #:	<b>12</b>	Description: <b>DSCN6312: Final effluent pH.</b>	





Office of Water Quality Photographic Evidence Sheet

Location:	<b>Kohler Company</b>				
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>	Time:	<b>10:27</b>
Witness:				Photo #:	<b>13</b>
Description:	<b>DSCN6313: Sampling port for grab samples.</b>				



Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>	Time:	<b>10:12</b>
Witness:				Photo #:	<b>14</b>
Description:	<b>DSCN6300: Inside of composite sampler.</b>				



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Kohler Company</b>		
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>10:32</b>	Witness:	
Photo #:	<b>15</b>	Description:	<b>DSCN6317: Filter press.</b>



Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>
Time:	<b>10:29</b>	Witness:	
Photo #:	<b>16</b>	Description:	<b>DSCN6314: Filter press surge tank.</b>





Office of Water Quality Photographic Evidence Sheet

Location:	<b>Kohler Company</b>				
Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>	Time:	<b>10:07</b>
Witness:				Photo #:	<b>17</b>
Description:	<b>DSCN6291: Emergency Tank</b>				



Photographer:	<b>Jason Bolenbaugh</b>	Date:	<b>8/17/2023</b>	Time:	<b>10:33</b>
Witness:				Photo #:	<b>18</b>
Description:	<b>DSCN6318: Spill kit.</b>				

