

Peltier, Hannah

From: Gilliam, Allen
Sent: Friday, April 03, 2015 9:28 AM
To: Steve Mallett; rbradley@citycorporation.com
Cc: Fuller, Kim; Peltier, Hannah; Beck, Amy; Anderson, Alan
Subject: AR0021768_Russellville City Corp Response to Jan 2014 Pretreatment Audit_20150203
Attachments: Pretreatment Audit Response 2015.pdf

Steve,

Russellville-City Corporation's response to the January Pretreatment Program Audit was electronically received, reviewed and appeared to address the deficiencies noted in the Audit's findings. Please ensure the corrective actions are completed. These are not this office's requirements, they are based on the Federal Pretreatment Requirements in 40 CFR 403.

Also please pay special attention to the "STRONG Recommendations" made in the Audit. While there is no regulatory requirement specifying what has to be included in an industry inspection, this office considers a comprehensive inspection (form) be filled out indicating all aspects of the industry's wastewater generating processes are identified/confirmed as well as several other areas which should be noted in a comprehensive inspection.

The same applies the "Fact Sheets" recommendation. If City Corporation had comprehensive fact sheets for each of its industries, any interested party could review that industry's fact sheet and be able to identify its wastewater processes and how it flows through treatment to the final sampling point. Permit limits would not be in question if their statement of basis were also included.

This office will be available to help determine Taber's production based limits.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Steve Mallett [<mailto:smallett@citycorporation.com>]
Sent: Thursday, April 02, 2015 3:28 PM
To: Gilliam, Allen
Cc: Randy Bradley; Larry Collins; Steve Mallett
Subject: Response to recent Pretreatment Audit

Allen –

Please find attached our response to the recent Pretreatment Audit that outlines our corrective actions related to the items cited. Please feel free to contact Randy Bradley, Larry Collins and/or myself if you need any additional information.

Thanks.

Steve Mallett, Jr., P.E.
General Manager

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April 2, 2015

Mr. Allen Gilliam
ADEQ State Pretreatment Coordinator
Arkansas Department of Environmental Quality
5301 Northshore Dr
North Little Rock, Arkansas 72118

RE: City of Russellville Pretreatment Program Audit/Municipal Pollution
Prevention (P2) Assessment

Mr. Gilliam:

This letter shall serve as City Corporation's response to referenced audit and includes actions to address the deficiencies and recommendations as outlined in your letter dated March 16, 2015.

Finding 1: Under 40 CFR 403.8(f)(2)(i). The City will identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to [ADEQ] upon request;"

Corrective Action: Pretreatment staff will continue to survey local business using company system generated list of business accounts. An excel spreadsheet will be developed to track and document the results of returned surveys. Any business that does not return survey will be inspected to determine any pretreatment requirements.

Finding 2: Under 40 CFR 403.8(f)(1)(B). "Individual ... control mechanisms must be enforceable and contain, at a minimum, the following conditions: (3) effluent limits... based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law; "

Corrective Action: Industrial Wastewater Discharge Permits will be renewed/issued this year. During this renewal cycle, all deficiencies noted for Taber Extrusion's permit will be corrected. Pretreatment Coordinator will ensure the correct parameters for calculating correct permit limits are followed.

Finding 3: Under 40 CFR 403.8(f)(2)(v), "[the City will] Randomly sample and analyze the effluent from industrial Users and conduct surveillance activities in order to identify,

independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards.”

Corrective Action: (3a) Pretreatment inspector will add to inspection form an area to document review of records to verify production from Taber Extrusion. This verification will occur each inspection and randomly if needed to ensure compliance with permit limits. (3b) Pretreatment Coordinator will require Grace Manufacturing to re-plumb the regulated wastestream from the vibrator tumbling units and ensure this wastestream goes to Grace’s pretreatment facility.

Finding 4. Under 40 CFR 403.8(f)(g), “Monitoring and analysis to demonstrate continued compliance. (1) The reports required in paragraphs (b), (d), (e) and (h) of this section shall contain the results of sampling and analysis of the Discharge, including the flow and the nature and concentration, or production and mass where requested by the Control Authority, of pollutants contained therein which are limited by the applicable Pretreatment Standards.”

Corrective Action: Taber Extrusion's permit will be revised to reflect the requirements as described in your letter. City Corporation will also work closely with your office in the development of permit requirements to ensure we are sampling and monitoring in the correct manner.

Finding 5: Under 40 CFR 403.8(f)(a)(B), “Individual Control mechanisms must be enforceable and contain, at a minimum, the following conditions: (3) Effluent limits, including Best Management Practices based on applicable general Pretreatment Standards in part 403 of this chapter...”

Corrective Action: Best Management Practices (BMPs) will be included in industrial permits as required and listed in the limits pages with the rest of the numeric limits.

Finding 6: Under 40 CFR 403.12(b)(3), “the User shall submit a brief description of the nature, average rate of production, and Standard industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated process.”

Corrective Action: The requirement to supply the above requirement has been sent to all permitted industries. These required documents will be required before new permits are issued later this year. Pretreatment Coordinator will ensure each permitted User has submitted the required description.

Finding 7: Under 40 CFR 403.12(g), “Monitoring and analysis to demonstrate continued compliance. (2) If sampling performed by an Industrial User indicates a violation, the User shall notify the Control Authority within 24 hours of becoming aware of the violation. The User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within 30 days after becoming aware of the violation. Where the Control Authority has performed the sampling and analysis in lieu of the Industrial User, the Control Authority must perform the repeat sampling and analysis unless it notifies the User of the violation and requires the User to perform the repeat analysis.”

Corrective Action: City Corporation's Pretreatment Coordinator has briefed all industrial reps during a pretreatment meeting on the 24 hour notification requirement. This requirement is currently in each Industrial User permit. Pretreatment staff will review all documents that indicate a violation to determine if the notification was conducted, if notification was not made then a Notice of Violation will be issued. Any analysis indicating a permit violation during sampling by the Control Authority a repeat sampling will be conducted by City Corporation and the results of the repeat analysis will become part of the industrial record and copy forwarded to the industry in violation.

RECOMMENDED POTW ACTIONS FOR IMPROVED IMPLEMENTATION OF THE
PRETREATMENT AND POLLUTION PREVENTION PROGRAMS.

City Corporation will consider each recommendation as outlined in your letter. Any recommended action that provides an improvement for our pretreatment program will be implemented.

City Corporation continues to strive to be the best in every area of our company and improvements to this very important program are taken very seriously. Any failure on City Corporation's staff to fully implement and carry out the requirements of the National Pretreatment Program are due to oversight and never intentional. I want to ensure you that the team we have in place to operate the program will implement all required changes and will strive to ensure the integrity of our collection system and treatment plant.

If you have any questions concerning this report, please contact Randy Bradley, Pretreatment Coordinator, at (479) 968-2080, extension 224.

Sincerely,



Steve Mallett
General Manager