



Springdale Water Utilities

526 Oak Avenue P.O. Box 769 Springdale, Arkansas 72765-0769 (479) 751-5751

July 6, 2007

Mr. Dale Washam
Inspector Supervisor, Water Division
Arkansas Dept. of Environmental Quality
P. O. Box 8913
Little Rock, AR 72219-8913

AFIN NO: 72 00003 PERMIT NO: AR0022063
Media: Water
Sort: Permit Compliance Report
Date Scanned: 3/18/08

**RE: AFIN: 72-00003
NPDES Permit No. AR0022063
Pretreatment Compliance Inspection (PCI)
Written Response**

Dear Mr. Washam:

Thank you for leading the Pretreatment Compliance Inspection conducted by you, Mr. James Eng (USEPA), and Mr. John Fazio (ADEQ) on May 9, 2007. We look forward to inspections by your agency as an opportunity to further refine and optimize a program in which we have great pride.

According to the letter you sent dated June 26, 2007, a single issue was revealed during the inspection that required a revision in sampling and analysis procedures by our pretreatment group. Specifically, the "4 grab" requirement for pH listed in 40 CFR Part 403.12.b.5iii was not being followed. Quarterly pH sampling and analysis protocols for compliance monitoring of regulated industrial users were revised immediately following the inspection to comply with this requirement.

As you know, the 4 grab requirement only applied to baseline monitoring reports until the Pretreatment "Streamlining" rules were promulgated on October 14, 2005. Since that time, there have been numerous discussions and interpretations made by various federal and state agencies regarding the many required and optional modifications coming out of these rules. The discussion section pertaining to 403.12(b), "Use of Grab and Composite Samples" includes the following: "*Is a minimum frequency required for grab samples?*" The final regulatory changes eliminate the requirement that a minimum of four grab samples be taken in all instances to measure pH, cyanide, total phenols, oil and grease, sulfides, and volatile organic compounds. Control Authorities will have the flexibility to determine the appropriate minimum number of grab samples Industrial Users are required to take. . . . For facilities where historical sampling data are available, the Control Authority may authorize a lower minimum number of grab samples."

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

Name of Municipality: City of Springdale

AFIN Number: 72-00003

NPDES Permit Number(s): AR0022063,AR0022063C

Program Tracked under NPDES Permit Number: AR0022063

Fact Sheet Preparation Date: None/ Has summary sheets on some IU

Date of Last PCI/Audit: December 7, 2005/ June 11&12,2003

Date of Last Annual Report: January 26,2007(12/1/05thru
11/30/06)

Name of Inspector: Dale Washam

Date PCI Performed: May 9, 2007

Name, Title, and Telephone Number of Facility Representative:
Jennifer Enos/Pretreatment Manager/479-756-3657

Name and Title of Other Participants: John Fazio/ADEQ inspector
James Eng/ EPA inspector

Number of IUs Visited: 1

Name(s) of IUs Visited: Danahar Tool Group

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.**

Form approved July 1989

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. Triple T food is temporary closed and the Permit has become inactive. Tyson Foods Discovery Center was added in February 2007.

2. Has ADEQ or EPA been notified of these changes? yes
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** yes
No annual survey but has on-going survey of users
4. What procedures are being used to update the IU Survey?
Survey water users, telephone listing, drive-by observations, survey new commercial water deposits,

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) 15
6. Number of Categorical Industrial Users: 2
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Requesting official categorization by ADEQ and reviewing the categorical standards in the federal register (40CFR)

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Danaher Tool Group	Metal Finishing	Electroplating and Phosphating
Kawneer Co., Inc.	Aluminum Forming	Anodizing and Painting Sub C extrusion part 476.45

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes
Technical based local limits are not needed.

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:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>Not required</u>	
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>Not required</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>Not required</u>	
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>Not required</u>	
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>Not required</u>	
Sludge:	<u>1/year</u>	<u>PCBs only</u>	<u>Not required</u>	

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? Permit
2. How many IU permits (or other control documents) have been issued? 16

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?

An expiration date: yes

Discharge limitations: yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: yes

IU reporting requirements: yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: yes

Type of sample: yes

Monitoring frequency: yes

Bypass prohibition: yes

Right of entry: yes

Nontransferability: yes

Revocation clause: yes

Penalty Provisions: yes

Slug load notification: yes

Notification of process change: yes

D. MONITORING OF IUS BY POTW

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

	Current frequency:	Program Requirement:
Sampling:	Danahar Tool 2/month	
categorical IUs	Kawneer 2/quarter	1/year
other SIUs	7/month to quarterly	1/year
Inspection:		
categorical IUs	At least 1/year	1/year
other SIUs	AT least 1/year	1/year

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes

3. Are inspections announced or unannounced? both

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): Yes

6. Overall adequacy of inspection documentation: _____

Satisfactory

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, however, grab samples for ph have not been taken in accordance with the requirements of the pretreatment regulations.
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes
9. Are sampling and flow monitoring equipment properly maintained? Did not evaluate
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? All reports are marked date received and Ms. Enos review and verify the reports and data. The reports are filed and the reports are tracked on computer log.
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

17. What are the POTW's procedures for following up violations?
All violations are responded to in accordance with their
Enforcement Response Plan. The course at action depends on
the violation.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR
403.12(b)?: N/A
No new categorical industrial Users since early 80's

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: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling
procedures: On Danahar Tool Group, the IU certify monthly
that they are TTO free instead of sampling for TTO. The
City once a year sample the effluent of Danahar Tool Group
and have a consulting laboratory analyze the sample for TTO.
Danahar submitted the latest TOMP in November 2006.

The City has not been taking a representative sample of the
IUs discharge for pH. The pH samples taken by the City when
Monitoring IUs have not been taken in accordance with the
requirements of 40 CFR 403.12.b.5. iii.

5. Comments on the POTW's enforcement procedures:

Satisfactory- The city is implementing the Enforcement Program Guide that is in their Pretreatment Program.

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**
**See section H

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:
One- J.B. Hunt

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **Yes**
By City contract and by City Ordinance

3. Does the POTW have copies of permits for IUs in other cities? **Yes-City of Springdale issues the permit**

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: **Satisfactory**

H. EVALUATION AND COMMENTS

On the last Annual Industrial Pretreatment Report (12-1-05 thru 11-30-06), no industrial users were in significant noncompliance during the reporting period.

The program structure states that the staff level will be six(6) personnel. At the time of the inspection, the Laboratory Supervisor position was open and has not been filled. The staff appeared to be adequate at the time of the inspection and to be very knowledgeable of the program and the requirements. The files and records were well organized and complete.

The City has not been taking a representative sample for pH when monitoring the industrial users. The pH samples taken by the City when monitoring industrial users have not been taken in accordance with the requirements of 40 CFR 403.12.b.5.iii. The condition requires collecting a minimum of four(4) grab samples for pH during a 24 hour period.

The city's wastewater treatment plant is designed for 24 MGD, and the last annual monthly average flow was 10.5 MGD. The waste water from the SIUs is approximately 35 % of the total flow.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Danahar Tool Group

POTW Name: City of Springdale

Industry Contacts: Gary Young/Waste Treatment Manager
Melissa Turner/Plating Manager

Date and Time of Visit: May 9, 2007 1400hours

Description of Manufacturing Process:
Bar or flat metal is sheared-> hot forged or mo/phos dipped-> and cold forged->abraded->stamped
->ground->broached->side ground->heat treated-> wheel abraded->polished-> vibratory
polished->ni-cr or ni plated or ni-cobalt plated

Sources of Process Wastewater:
3 plating lines, zinc phosphate rinse, waste oil recovery
System, part washer, wet vibratory and floor cleaning.

Categorical Industry? yes

Basis for Limits: Regulation (40CFR)

Point of Application: At discharge point

Description of Pretreatment Equipment and Procedures:
Plating waste holding tank, ph adjustment, clarifier, sludge
thickening tank, filter press, waste disposal and discharge to
City.

Spill Prevention and Solvent Management Procedures:
The facility submits a certification of TTO free monthly.
Overall spill prevention was adequate, however housekeeping
needs improvement in barrel and chemical storage areas and
the waste oil recover area.

Sampling Location and Equipment:
Adequate. The city uses portable composite sampler to collect
samples.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Dale Washam/John Fazio</u>	
NAME OF FACILITY:	<u>City of Springdale</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022063</u>	NPID
DATE OF PCI:	<u>May 9, 2007</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>16</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>2</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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES											yr/mo/day					Inspec. Type	Inspector	Fac Type								
1 N 2 5 3 A R 0 0 2 2 0 6 3 11 12 0 7 0 5 0 9 17 18 I 19 T 20 2																											
Remarks																											
0 0 1 C																											
Inspection Work Days						Facility Evaluation Rating						BI	QA	Reserved													
67						70 N						71 N	72 N	73		74	75										80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Danahar Tool Group (City of Springdale--AR0022063) 1609 N. Old Missouri Rd. Springdale, AR 72764	Entry Time /Date 1400 / 5-9-07	Permit Effective Date N/A
	Exit Time/Date 1615/ 5-9-07	Permit Expiration Date N/A
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Gary Young/ Wastewater Treatment Manager/479-466-4542 Melissa Turner/ Plating Manager/ 479-466-4542	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Randy Fox/ Director of Operation 1609 N. Old Missouri Rd. Springdale, AR 72764	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	Y	Pretreatment	N	Sampling
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Facility was overall satisfactory. Additional housekeeping measures are needed in the barrel and chemical storage area, and the waste oil recycle area. Some storm water issues were noted outside the production building.

Name(s) and Signature(s) of Inspector(s) Dale Washam <i>Dale D. Washam</i>	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality Mammoth Spring/870-625-7477	Date June 1, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Danahar Tool Group

Industry Contacts: Gary Young/Wastewater Treatment Manager & Environmental Tech

Melissa Turner/ Plating Manager

Type of Industry: Metal finishing- tool manufacturing SIC # 3423

589 employees 24hr/7day week

Date of Visit: May 9, 2007

- | | | | |
|--|---|-----------------------------|---|
| 1. Significant industrial user: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 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 |

Additional Comments: Waste oil is picking up by Used Oil Services Co. Inc. in Springdale, AR
Nickel strips disposed by Prema Fix Treatment Services in Tulsa, OK . The plating waste is disposed by World Resources Co. in Pottsville, PA. Observation made during the visit was that additional housekeeping measures need to be taken in the barrel and chemical storage areas. It was noted outside the plant some storm water issues.

Visit Conducted By: Dale Washam, John Fazio and James Eng Date: June 1, 2007