



Springdale Water Utilities

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

Allen Gilliam
Arkansas Department of Environmental Quality
5301 Northshore Dr.
North Little Rock, AR 72118-5317

6481

DEC - 1 2008

**RE: City of Springdale, AR
NPDES #AR0022063, AFIN #72-00003
Pretreatment Program Audit/ Pollution Prevention (P2)
Assessment**

Adequate *nh*
No comments necessary
AE

November 24, 2008

Dear Mr. Gilliam:

Enclosed is a copy of Springdale Water Utilities' response to your audit report dated October 27, 2008.

We once again enjoyed the opportunity to show you Springdale's Industrial Pretreatment Program during this audit. As in the past, the main focus of Springdale's program is its work in the field, with frequent, usually positive contacts made with our commercial and industrial users. We are proud of the working relationship we have established with the industrial community. Springdale's superlative compliance record clearly shows the effectiveness of this approach to program implementation.

We appreciate your guidance and assistance in identifying potential areas of improvement in our program. I believe that this response will show you that the two required corrections coming from your audit are being addressed in a timely manner. Your recommendations for optimization of the Pretreatment Program are also appreciated. These suggestions will certainly be taken into consideration during the next few months, as Springdale's program modifications are prepared for submission to you for approval.

NPDES PERMIT FILE
NPDES # AR 0022063
AFIN # 72-00003
Permit PN
 Correspondence
 Technical Backup
3/27/09 / nh / AE Date Scanned

p. 2 of 2

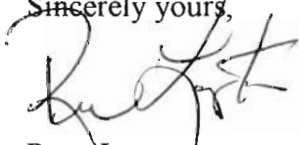
City of Springdale, AR

NPDES# AR0022063, AFIN#72-00003

Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

If you have any questions concerning this response, or if you feel that any part of the audit has not been adequately addressed, please do not hesitate to contact Ms. Jennifer Enos at (479)756-3657. Thank you again for your time and this very positive review of Springdale's program.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Rene Langston". The signature is stylized and cursive.

Rene Langston

Executive Director

JEE/jee

Attachments

Cc: Jennifer Enos, Pretreatment Mgr., SWU
Harold Hull, WWTF Director, SWU
John Fazio, Field Inspector, ADEQ
File

**CITY OF SPRINGDALE, AR
NPDES #AR0022063, AFIN# 72-00003**

**Pretreatment Program Audit
Pollution Prevention Assessment
Report Response**

The City should require their IU representatives to submit updated, more detailed, accurate (in relation to actual plant-floor layout) schematics, including a comprehensive, step-by-step narrative description of their processes generating wastewater. Type of chemical baths/rinses could be identified. Most industries have the capability to create computer automated drawings to depict these “schematics” without much effort. Workpiece(s) flow, P2 practices (counter current flows, ultrasonic cleaning, heated, air-agitated, etc.) and chemical storage areas should be noted. If these documents had been in files reviewed (and current), there might not have been as many questions by this auditor during the site visits.

Dump frequencies and volumes also should be noted from the numerous tanks and vessels at the industries. The City must have this information on file to conduct/require representative sampling and determine types (grabs vs. composite).

Any updates should be dated as to when they were last revised and, as they are now, attached to the City’s fact sheets.

Response:

Springdale Water Utilities staff are intimately familiar with the industries permitted under the Industrial Pretreatment Program and therefore are very confident that representative sampling of the correct type is being conducted. In addition, the usual monitoring frequency for permitted IUs is far greater than that required by the approved program, helping to insure that sampling is representative.

As part of their permit renewal process or sooner, Springdale Water Utilities will request more comprehensive schematics and process descriptions from its categorical Industrial Users as it is determined that more information would be beneficial in order to make a review of their operations simpler.

3. It’s recommended to include an example of a parameter’s permit limit calculation in the IU’s fact sheets. The City does include limit calculations in some of their more complex permits, but should they not also be attached to the “evolving” fact sheets? Again, it would have saved this auditor some time in looking for IU’s accurate limit calculations/basis.

Response:

Limit calculations will be added to IU fact sheets as they are completed. The drafting of fact sheets to be incorporated in permitted IU files was initiated late this year, starting with Categorical IUs, and will be completed as permits come up for renewal.

4. Recommend an occasional Toxicity Characteristic Leaching Procedure (TCLP under 40 CFR 261.24) be required of landfill leachate being hauled in by truck. This would show good faith efforts on the City's part that it is not accepting (therefore, storing or treating) hazardous waste.

Response:

TCLP testing was required by Springdale Water Utilities before landfill leachate was first allowed to be discharged at the POTW. Results yielded positive values for some metals, but none for organics. Thus, current semi-annual monitoring required for leachate focuses on metals analyses, along with some nutrients and conventional pollutants. Upon renewal, TCLP testing will be incorporated into the landfill leachate permit as per this recommendation.

5. – 10. P2 and BMP recommendations

Response:

Springdale Water Utilities appreciates receiving recommendations to help optimize its pretreatment program. We strive for continued improvement of our program. These various recommendations will be considered during the process of program modification (see below) as they fit with Springdale's pretreatment program. Time, resources, and community "fit" must also be taken into consideration as these recommendations are assessed.

D. Required Program Modifications to the Approved Pretreatment Program Necessary to Bring the Program Into Compliance with the Letter or Intent of the Current Regulatory Requirements

1. The City's Pretreatment Program is not current with the Streamlining Revisions to 40 CFR 403. Program modifications must be submitted and will be required upon NPDES permit renewal.

Response:

The required program modifications will be submitted for review and approval by ADEQ well in advance of the mandatory deadline of 12 months following NPDES permit renewal. All other "Streamlining" modifications (slug potential evaluation, grab sampling) have already been implemented.

2. These modifications should include a revised maximum allowable headworks loading evaluation indicating whether local limits are necessary or not.

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City of Springdale, AR

NPDES# AR0022063, AFIN#72-00003

Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Response:

Analyses subsequent to the completion of Springdale's late 2005 WWTF upgrades and modifications have clearly shown a substantial reduction in effluent discharge of metals. Addition of liquid alum and sand filters have both contributed to these reductions. Along with the switch from land application to landfilling biosolids, it is unlikely that the updated maximum allowable headworks loading evaluation planned for next year will show any need for local limits. This evaluation will be done subsequent to Springdale's NPDES permit renewal to insure that current permit limitations are utilized in the evaluation.

ATTACHMENTS



Springdale Water Utilities

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

(sample letter to listed waste generator)
Access Computer Products, Inc.
5336 Hailey Dr.
Springdale, AR 72762

**RE: Hazardous Waste Notification Requirement
ADEQ Hazardous Waste Generators Facility Summary**

February 1, 2008

Dear Sir or Madame:

Your company has been identified as one which produces hazardous waste from its listing on the Arkansas Dept. of Environmental Quality's Hazardous Waste Generators Facility Summary. As such, you are hereby being notified of a federal requirement that may or may not apply to you.

A copy of 40 CFR Part 403.12 (p) is enclosed for your review. If you do not discharge hazardous waste into the sanitary sewer system, this notification requirement does not apply to you. If any or all of the hazardous waste your company generates is discharged into the sanitary sewer, and is subsequently treated by Springdale's wastewater treatment facility, the notification requirement may apply, depending on the type and amount of material that is discharged in this manner.

If, after review, you believe that this notification requirement applies to your company, the POTW (publicly owned treatment works) portion of the notification may be submitted to me at the address listed above.

Please feel free to call me at (479)756-3659 if you have any questions concerning this issue.

Sincerely,

Jennifer Enos
Pretreatment Manager

JEE/jee
Attachment
CC: file



Springdale Water Utilities

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

(sample letter to listed waste generator)
Firstcare Family Doctors - Springdale
100 S. Shiloh
Springdale, AR 72764

**RE: Hazardous Waste Notification Requirement
Medical Service Providers**

February 1, 2008

Dear Sir or Madame:

Your facility has been identified as one which may potentially produce hazardous waste that may currently be disposed of in Springdale's sanitary sewer system. These wastes might include (nondigital) X-ray or photographic processing waste, unused medications (prescription or over the counter), or other hazardous material produced by on-site medical procedures. As such, you are hereby being notified of a federal requirement that may or may not apply to you.

A copy of 40 CFR Part 403.12 (p) is enclosed for your review. If you do not discharge hazardous waste into the sanitary sewer system, this notification requirement does not apply to you. If any or all of the hazardous waste your company generates is discharged into the sanitary sewer, and is subsequently treated by Springdale's wastewater treatment facility, the notification requirement may apply, depending on the type and amount of material that is discharged in this manner.

If, after review, you believe that this notification requirement applies to your company, the POTW (publicly owned treatment works) portion of the notification may be submitted to me at the address listed above.

Please feel free to call me at (479)756-3659 if you have any questions concerning this issue.

Sincerely,

Jennifer Enos
Pretreatment Manager

JEE/jee
Attachment
CC: file

40 CFR 403.12 (p) - Hazardous Waste Notification Requirement:

p)(1) The Industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261. Such notification must include the name of the hazardous waste as set forth in 40 CFR part 261, the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the Industrial User discharges more than 100 kilograms of such waste per calendar month to the POTW, the notification shall also contain the following information to the extent such information is known and readily available to the Industrial User: An identification of the hazardous constituents contained in the wastes, an estimation of the mass and concentration of such constituents in the wastestream discharged during that calendar month, and an estimation of the mass of constituents in the wastestream expected to be discharged during the following twelve months. All notifications must take place within 180 days of the effective date of this rule. Industrial users who commence discharging after the effective date of this rule shall provide the notification no later than 180 days after the discharge of the listed or characteristic hazardous waste. Any notification under this paragraph need be submitted only once for each hazardous waste discharged. However, notifications of changed discharges must be submitted under 40 CFR 403.12 (j). The notification requirement in this section does not apply to pollutants already reported under the self-monitoring requirements of 40 CFR 403.12 (b), (d), and (e).

(2) Dischargers are exempt from the requirements of paragraph (p)(1) of this section during a calendar month in which they discharge no more than fifteen kilograms of hazardous wastes, unless the wastes are acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e). Discharge of more than fifteen kilograms of non-acute hazardous wastes in a calendar month, or of any quantity of acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e), requires a one-time notification.

Subsequent months during which the Industrial User discharges more than such quantities of any hazardous waste do not require additional notification.

(3) In the case of any new regulations under section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any additional substance as a hazardous waste, the Industrial User must notify the POTW, the EPA Regional Waste Management Waste Division Director, and State hazardous waste authorities of the discharge of such substance within 90 days of the effective date of such regulations.

(4) In the case of any notification made under paragraph (p) of this section, the Industrial User shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.