



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	1	7	7	6	11	12	0	6	1	2	2	2	17	18	P	19	S	20	1		
Remarks																														
A	F	I	N	3	1	-	0	0	0	3	6					H	O	W	A	R	D			C	O	U	N	T	Y	
Inspection Work Days				Facility Evaluation Rating				BI		QA		Reserved																		
67				69	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)		Entry Time /Date		Permit Effective Date	
City of Nashville Hwy 27 ~ 1/2 mile south of town		0837 / 12-22-2006		November 1, 2003	
		Exit Time/Date		Permit Expiration Date	
		1343 / 12-22-2006		October 31, 2008	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
Ed Carlyle, Jr. / Pretreatment Coordinator / (870) 845-7402 (870) 557-0812 cell #				PCI	
Name, Address of Responsible Official/Title/Phone and Fax Number				Contacted	
Larry Dunaway / Public Works Director 426 North Main Street Nashville, AR 71852				Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

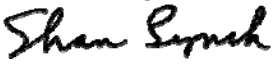
Section C: Areas Evaluated During Inspection

(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	M	Pretreatment	N	Sampling
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

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

* See Page 10, Evaluation and Comments

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Telephone/Fax		Date	
 Shan Lynch		ADEQ / Dist. 12 / 870-389-6970		January 4, 2007	
Signature of Reviewer		Agency/Office/Phone and Fax Numbers		Date	

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

Name of Municipality: City of Nashville

AFIN Number: 31-00036

NPDES Permit Number(s): AR0021776

Program Tracked under NPDES Permit Number: AR0021776

Fact Sheet Preparation Date: NA

Date of Last PCI/Audit: April 17, 2006 / PCI

Date of Last Annual Report: NA

Name of Inspector: Shan Lynch

Date PCI Performed: December 22, 2006

Name, Title, and Telephone Number of Facility Representative:

Ed Carlyle, Jr. / Pretreatment Coordinator / (870) 845-7402

Name and Title of Other Participants: None

Number of IUs Visited: 1

Name(s) of IUs Visited: Husqvarna Outdoor Products

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. None, however, Aero - Incorporated no longer discharges to the City's collection system
2. Has ADEQ or EPA been notified of these changes? NA
3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? yes
4. What procedures are being used to update the IU Survey? Water dept. notifies of new connections; newspaper; city council meetings; manhole inspections; phone book listings; city personnel
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) 3
6. Number of Categorical Industrial Users: 3
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Federal regulations
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:
Jan-Eze Plating	Metal finisher	Polishing, plating
Husqvarna Outdoor Products	Metal finisher	Electrochemical deburring
Aero-Incorporated	Metal finisher	Electroplating
*no discharge		

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? No, facility using categorical limits. But, plan on investigating the need to establish local limits within the next year.

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>4 / year</u>	<u>4 / year</u>	<u>none</u>	
Effluent:	<u>4 / year</u>	<u>4 / year</u>	<u>none</u>	
Sludge:	<u>none</u>	<u>none</u>	<u>none</u>	
Organics:				
Influent:	<u>1 / year</u>	<u>1 / year</u>	<u>none</u>	
Effluent:	<u>1 / year</u>	<u>1 / year</u>	<u>none</u>	
Sludge:	<u>none</u>	<u>none</u>	<u>none</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? yes, permit

2. How many IU permits (or other control documents) have been issued? 3

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:		
categorical IUs	<u>3 / year</u>	<u>to be determined by Coordinator</u>
other SIUs	<u>NA</u>	<u>NA</u>
Inspection:		
categorical IUs	<u>2 / year</u>	<u>annually</u>
other SIUs	<u>NA</u>	<u>NA</u>

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

3. Are inspections announced or unannounced? 1 unannounced and 1 scheduled

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: S-M records reviewed in PC office rather than during inspection

Observation of IU self-monitoring procedures: yes

Verification that approved analytical techniques are used: verified at office

Verification of IU flow measurement (where required): NA

6. Overall adequacy of inspection documentation: satisfactory; but, may contain some unnecessary information in regards to permit 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

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? no

9. Are sampling and flow monitoring equipment properly maintained? yes

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? no

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? each IU has a separate three ring binder containing all facility information and is arranged by separate sections

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? yes, computer spread sheets and graphs of sample results

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?
Point out problems for minor paperwork errors. Issue NOV's
and fines for major permit violations.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR
403.12(b)?: yes

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: yes

Other environmental permits held: yes

Description of operations: yes

Process flow diagrams: yes

Flow measurements: yes

Measurements of regulated pollutants: yes

Certification of compliance by the IU: yes

Compliance schedule (if needed): NA

19. Additional comments on the POTW's inspection and sampling
procedures: _____

* See Section H

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? yes

2. How does the POTW respond to the following violations?

Effluent limitations: NOV and fines

Late reports: NOV and fines

Unpermitted discharges: NOV and fines

Slug loads or spills: NOV and fines

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)? NA

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:
NA			

5. Comments on the POTW's enforcement procedures:
satisfactory

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **no, an updated program is needed**

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? **NA**

3. Does the POTW have copies of permits for IUs in other cities? **NA**

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? **NA**

5. Comments on multijurisdictional issues: **NA**

H. EVALUATION AND COMMENTS

D,8 - The Oil and Grease samples collected at Husquvarna are not being collected in glass containers.

D,8 - Husquvarnas permit requires daily pH measurements. The facility is using pH paper for these measurements and not an approved pH meter.

D - The Husquvarna chain of custody forms indicate that the Oil and Grease samples are collected as a composite. The permit requires O&G be collected as a grab sample.

D - There are no pH collection times, analyses times or duplicate analyses for the Husquvarna pH monitoring.

D,11 - Inadequate sampling location at Husquvarna. A combined waste stream is being sampled when it was thought that only process water from the electrochemical deburring line was being sampled. This is an indication of an inadequate inspection program.

* Aero - Incorporated has ceased discharging into the City's treatment system as noted in the last PCI. City has noted a significant decrease in the chromium, nickel and copper influent sample results. The discharge line from Aero to the City has been disconnected. It is suggested that the City issue Aero-Inc. a "no discharge" permit with a provision that "no process wastewater will be discharged into the City's collection system" along with reporting requirements to certify monthly that no process waste water has been discharged to the City's collection system along with the standard certification statement in 403.6 (a) (2) (ii).

* The Pretreatment Program is in the process of being modified.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Husquvarna Outdoor Products

POTW Name: City of Nashville

Industry Contacts: Richey LaGrone

Date and Time of Visit: December 22, 2006 @ 1229

Description of Manufacturing Process:
Manufacture small engine driven items such as chainsaws and
weed eaters

Sources of Process Wastewater:
Electrochemical deburring of engine cylinders

Categorical Industry? yes

Basis for Limits: Federal regulations

Point of Application: end of process

Description of Pretreatment Equipment and Procedures:
No pretreatment equipment. The parts are electrochemically
deburred and the rinse water from this process is discharged.

Spill Prevention and Solvent Management Procedures:
Oil / mop water is now sent off site for disposal. Floor drains
are sealed.

Sampling Location and Equipment:
Sampling equipment is satisfactory; however, the sample location
is unsatisfactory. See Section H for further details.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Shan Lynch</u>	
NAME OF FACILITY:	<u>City of Nashville</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021776</u>	NPID
DATE OF PCI:	<u>December 22, 2006</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>3</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>3</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
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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 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> 4 <input type="text" value="2"/> 5 <input type="text" value="1"/> 6 <input type="text" value="7"/> 7 <input type="text" value="7"/> 8 <input type="text" value="6"/> 9 <input type="text" value="11"/> 10 <input type="text" value="12"/> 11 <input type="text" value="0"/> 12 <input type="text" value="6"/> 13 <input type="text" value="1"/> 14 <input type="text" value="2"/> 15 <input type="text" value="2"/> 16 <input type="text" value="2"/> 17 <input type="text" value="17"/> 18 <input type="text" value="I"/> 19 <input type="text" value="S"/> 20 <input type="text" value="2"/>					
Remarks					
<input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="1"/> <input type="text" value="C"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69	70 <input type="text" value="N"/>	71 <input type="text" value="N"/> 72 <input type="text" value="N"/> 73 <input type="text"/> 74 <input type="text"/> 75 <input type="text"/> <input type="text"/> <input type="text"/> 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) Husquvarna Outdoor Products Nashville, AR	Entry Time /Date 1229 / 12-22-2006	Permit Effective Date November 1, 2003
	Exit Time/Date 1339 / 12-22-2006	Permit Expiration Date October 30, 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Richey LaGrone / Environmental Coordinator / (870) 845-6817	Other Facility Data IU	
Name, Address of Responsible Official/Title/Phone and Fax Number Richey LaGrone / Environmental Coordinator / (870) 845-6817 1 Poulan Drive Nashville, AR 71852	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)

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

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

* See additional comments on Page 2

Name(s) and Signature(s) of Inspector(s) Shan Lynch <i>Shan Lynch</i>	Agency/Office/Telephone/Fax ADEQ / Dist. 12 / (870) 389-6970	Date January 4, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Husquvarna Outdoor Products

Industry Contacts: Richey LaGrone

Type of Industry: Electrochemical deburring of small engine parts

Date of Visit: December 22, 2006

- | | | | |
|--|---|--|---|
| 1. Significant industrial user: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 3. Pretreatment equipment maintained and operational? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 4. Hazardous waste generated or stored? | <input type="checkbox"/> Yes | <input checked="" 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 type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 8. Appropriate self-monitoring procedures / equipment? | <input type="checkbox"/> Yes | <input checked="" 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: _____

7. A combined waste stream is being sampled when it was originally thought that only process water from the electrochemical deburring line was being sampled.

8. The oil and grease samples are not being collected in glass containers. The daily pH measurements are taken with pH paper and not with an approved meter. The oil and grease samples are being collected as a composite and not a grab. There are no pH collection times, analyses times or duplicate analyses for the daily pH measurements.

Visit Conducted By: Shan Lynch Date: December 22, 2006

ADEQ

ARKANSAS
Department of Environmental Quality

January 4, 2007

Greg Strawn, Water and Sewer Supt.
City of Nashville
426 North Main Street
Nashville, AR 71852

RE: AFIN: 31-00036 NPDES Permit No.: AR0021776
Pretreatment inspection

Dear Mr. Strawn:

On December 22, 2006, I performed a routine pretreatment compliance inspection in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. The Oil and Grease samples collected at Husquvarna are not being collected in glass containers.
2. The Husquvarna permit requires daily pH measurements. The facility is using pH paper for these measurements and not an approved pH meter.
3. The Husquvarna chain of custody forms indicate that the Oil and Grease are being collected as a composite. The issued permit requires the O&G samples be collected as a grab.
4. There are no pH collection times, analyses times, or duplicate analyses for the Husquvarna pH monitoring.
5. Inadequate sampling location at Husquvarna: a combined waste stream is and has been sampled when it was thought that only process water from the electrochemical deburring line was being sampled. This is an indication of an inadequate inspection program.

Additionally, Aero-Incorporated has ceased discharging into the City's treatment system as noted during the last PCI. It is suggested that the City issue Aero a "no discharge" permit, with a provision that "no process wastewater will be discharged into the City's collection system", along with reporting requirements to certify monthly, that no process wastewater has been discharged to the City's collection system along with the standard certification statement in 403.6(a)(2)(ii).

WATER DIVISION

City of Nashville PCI
January 4, 2007
Page: Two

The above items require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department. This response should contain documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by **January 25, 2007.**

If I can be any assistance, please contact me at 870-389-6970.

Sincerely,

A handwritten signature in black ink that reads "Shan Lynch". The signature is written in a cursive, slightly slanted style.

Shan Lynch
District Field Inspector
Water Division

cc: NPDES Enforcement Branch
NPDES Permit Branch



State of Arkansas
Department of Environmental Quality
8001 National Drive, P.O. Box 8913
Little Rock, AR 72219-8913

Attn: Shan Lynch
State ADEQ Inspector

Re: Response Letter to Annual Inspection
Performed on December 22, 2006

Dear Shan:

I am sending you a copy of the letter I sent to Dennis Benson and Allen Gilliam concerning a state inspection performed on December 22, 2006. If you find any flaws or have any further questions, please inform me as soon as possible.

Sincerely,



Ed Carlyle, Jr.
Pretreatment Coordinator
City of Nashville

cc: Letters to State File

RECEIVED
JAN 18 2007
RESULTS

January 11, 2007

State of Arkansas
Arkansas Dept. of Environmental Quality
8001 National Drive, P.O. Box 8913
Little Rock, AR 72219-8913

Attn: Mr. Dennis Benson
Technical Assistance Manager
NPDES Enforcement Section

Re: ADEQ Inspection, December 22, 2006
Mr. Shan Lynch, Inspector
Response and Corrective Actions

Dear Mr. Benson:

On December 22, 2006, Mr. Lynch performed an annual inspection of the pretreatment program for the City of Nashville. The following is the response and corrective actions taken by the city:

1. The Oil and Grease samples collected at Husquvarna Outdoor Products are not being collected in glass containers.

Response: Husquvarna was verbally and in written response told to contact their laboratory, American Interplex, to provide glass containers and too document all Oil and Grease requirements on laboratory Chain of Custody's.

2. The Husquvarna permit requires daily pH measurements. The facility is using pH paper for these measurements and not an approved pH meter.

Response: The city sent an amendment of their wastewater discharge permit to them with a change from daily pH's to quarterly. This requirement was discussed between all parties involved during the inspection and quarterly coincided with sampling requirements, thus daily records were not important or needed. Husquvarna was required by letter on January 11, 2007 to obtain within 30 days a professional pH meter.

3. The Husquvarna chain of custody forms indicate that Oil and Grease are composite samples not grab. The issued permit requires the Oil and Grease samples collected should be grab.

Response: Richey Legrone, Environmental Technician, of Husquvarna was told verbally and with letter, that they are required to collect one Oil and Grease sample as a grab within the twenty-four (24) hour sampling period. If he takes more than one sample, each sample would be a separate sample to be analyzed.

4. There are no pH collection times, analysis times, or duplicate analyses for the Husquvarna pH monitoring.

Response: It has been suggested from the city's pretreatment coordinator, Ed Carlyle, that Husquvarna's environmental personnel contact their laboratory, American Interplex, and show them the violation's, and together they find the right solutions and processes dealing with the sampling of pH monitoring, chain of custody's, and record keeping. The city pretreatment coordinator would also be instrumental in correcting this response.

5. Inadequate sampling location at Husquvarna: a combined waste stream is and has been sampled when it was thought that only processed water from the electro-chemical deburring line was being sampled. This is an indication of an inadequate inspection program.

Response: The simplest corrective action would be to change the sampling point to directly after the discharge from the machine. We have suggested

that the city dye test all discharge lines to the city sewer collection system to determine what is being discharged and the discharge location. We will inform ADEQ of our decisions and actions taken when dye test are completed within the next month.

6. It was also mentioned in the report that Aero-Incorporated has ceased discharging into the City of Nashville's collection system from the plating line. It was suggested that the City issue a "no discharge permit" with a provision that "no process wastewater will be discharged into the City' collection system," along with reporting requirements to certify monthly, that no process wastewater has been discharged to the City's collection system along with the standard certification statement in 403.6(a)(2)(ii).

Response: As per Aero-Incorporated's ceasing discharge into the City of Nashville's collection system, a letter was sent to Aero on December 15, 2006 explaining requirements if a discharge were to take place. This letter was also sent to Allen Gilliam, State Pretreatment Coordinator for the State. Our pretreatment coordinator will issue an amendment to their permit incorporating the requirements as per this letter in December as it was outlined, see enclosure. I will send this amendment to Allen for approval with a copy to your office.

As always, please contact us of any further recommendations, suggestion or requirements from your office which would benefit our pretreatment program. You may contact me at 870-845-4015.

Sincerely,



Larry Dunaway
Public Works Director

enclosure (1)

cc: Allen Gilliam, State Pretreatment Coordinator
Shan Lynch, ADEQ Inspector
State Inspection File, Pretreatment Office



December 15, 2006

Aero-Incorporated
600 South Mill Street
Nashville, AR 71852

Attn: Rick Cason
Safety Coordinator

Re: Discharge Permit
Discharge to the City

Dear Rick:

The City of Nashville recognizes that Aero-Incorporated no longer discharges to the City of Nashville's sewer system and to the Wastewater Treatment Plant. Technically your company is no longer required to be permitted by the City of Nashville and the Pretreatment Program. You have indicated too us you wish to remain permitted.

Therefore, this letter is to inform Aero-Incorporated shall follow the following guidelines as outlined by the City of Nashville:

- 1. You shall inform the Pretreatment Coordinator twenty-four (24) hours prior too any discharge from your treatment process.**
- 2. In the event of a discharge, the city will sample during the discharge period.**
- 3. An explanation of why you have changed your discharge status must be submitted to the city within five (5) days following the discharge.**
- 4. You shall follow all Guidelines of your Wastewater Discharge Permit.**
- 5. You shall include within your letter the amount of discharge gallons and time needed to discharge.**
- 6. You shall submit a plan if more than one batch on any given day is to be sent to the city.**

We appreciate all cooperation between Aero-Incorporated and the City of Nashville. The City of Nashville will continue to inspect your facility twice a year or more if needed.

If you have any further questions of concern, please contact my office at 870-845-4015.

Sincerely,

A handwritten signature in black ink that reads "Larry Dunaway". The signature is written in a cursive, flowing style.

**Larry Dunaway
Public Works Director**

**cc: Nick Trbovick, Jr., Owner
Allen Gilliam, State Pretreatment Coordinator
Ed Carlyle, Jr., Pretreatment Coordinator**