

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

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Name of Municipality: City of Bentonville

AFIN Number: 04-00154

NPDES Permit Number(s): AR0022403, AR0022403C, AR00C404

Program Tracked under NPDES Permit Number: AR0022403

Fact Sheet Preparation Date: N/A

Date of Last PCI/Audit: 11-23-04 / 06-20,21,22-06

Date of Last Annual Report: 11-21-06

Name of Inspector: John A. Fazio

Date PCI Performed: 05-10-07

Name, Title, and Telephone Number of Facility Representative:  
Nancy Busen, Laboratory Supervisor & Pre-Treatment Coordinator,  
479-271-3160

Name and Title of Other Participants: James Eng, EPA; Dale  
Washam, ADEQ

Number of IUs Visited: 1

Name(s) of IUs Visited: Kraft Foods North America, Inc.

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AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

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**NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATES 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. Tyson of Bentonville was deleted; Fujicolor Processing, Inc. is closing (June 15, 2007).
2. Has ADEQ or EPA been notified of these changes? Yes
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Although IU surveys were sent to select business/industry sectors in 2004 & 2005; the city must conduct and document a comprehensive non-domestic survey that includes all possible industrial users that might be subject to the Pretreatment Program. This requirement has not been met for many years.
4. What procedures are being used to update the IU Survey? Recent efforts include an 08/06 mail-out of site-specific questionnaires for Bentonville medical facilities, including veterinarians.
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) 4
6. Number of Categorical Industrial Users: 0
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Facility personnel reviews applicable regulations, visits industrial users and determines what regulations apply.
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:
<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, technically-based local limits have been established.

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2. Describe any apparent problems with the local limits.  
None

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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>0/year</u>	<u></u>
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>0/year</u>	<u></u>
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>0/year</u>	<u></u>
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>0/year</u>	<u></u>
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>0/year</u>	<u></u>
Sludge:	<u>0/year</u>	<u>0/year</u>	<u>0/year</u>	<u></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?  
No

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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? 4

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>N/A</u>	<u>1/year</u>
other SIUs	<u>1/month</u>	<u>1/year</u>
Inspection:		
categorical IUs	<u>N/A</u>	<u>1/year</u>
other SIUs	<u>At least 1/year</u>	<u>1/year</u>

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

3. Are inspections announced or unannounced? Announced

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: Nancy Busen

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: Fair. See #19 below for explanation.

- 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 and oil & grease 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? No. Flow meters are not calibrated as required by the controlling authority issued permits.
- 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 BMRs, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Data from self-monitoring reports is entered and tracked on spreadsheets. Hard copies are kept of self-monitoring reports, lab report forms, COCs, flow charts and pH charts.
- 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?  
In accordance with their Enforcement Response Plan.

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18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR  
403.12(b)?: N/A. No categorical IUs permitted at this  
time.

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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: Violations not noted/not enforced on the POTW's past  
inspections include IUs permits requirement for each IU to calibrate  
their flow meters prior to collection of all flow proportioned composite  
samples, and the pretreatment regulation requirement of taking a minimum  
of four grab samples for pH and oil & grease (where applicable to the  
IU's required sample parameters). In addition, Kraft Foods a) has not  
been performing their flow meter accuracy check (% error) properly, b)  
has had either periodic discharges to the POTW before final treatment or  
direct discharges to the waters of the State, and c) has had releases  
of product from their acid/caustic secondary containment structures to  
the waters of the State.

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5. Comments on the POTW's enforcement procedures:  
**The enforcement program has been implemented.**

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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? **Additional staff time dedicated to the program would be helpful.**
3. Are the responsible officials familiar with the approved program? **Needs additional training to better document and understand significant IU facilities layouts and treatment systems.**

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: **Northwest Arkansas Regional Airport (NWARA), City of Centerton POTW.**
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **Yes.**
3. Does the POTW have copies of permits for IUs in other cities? **N/A, none permitted - contracts only.**
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: **NWARA should be surveyed and/or visited again to determine if they are now a significant and/or categorical user.**

H. EVALUATION AND COMMENTS

Because of the issues discussed below, the Pretreatment Program has been given an unsatisfactory rating.

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A comprehensive Industrial User Survey has not been conducted as required by the regulations and the city's NPDES permit.

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A comprehensive Industrial User Survey must be conducted at a frequency adequate to identify and locate all possible Industrial Users which may be subject to the POTW Pretreatment Program and to ensure that all IUs are properly characterized at all times. These surveys should be specific to the various business/industry sectors. This will also help to facilitate identification and location of new categoricals under development by the EPA.

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Grab samples for pH and oil & grease have not been taken by the CA and the IUs in accordance with the requirements of the pretreatment regulations.

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Kraft Foods was not calibrating their flow meters prior to collection of all flow-composited samples as required by their permit, and were not performing their flow meter accuracy checks properly. These violations were not noted in the City's previous inspection reports. In addition, during the inspection conducted at Kraft Foods on 5/10/07, the following problems were noted:

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Evidence exists of either periodic bypasses (during periods of high flows) of effluent before final treatment or a direct discharge of effluent to the waters of the State. In addition, there was evidence that releases of acid and/or caustic product from the acid and caustic AST's secondary containment structures has occurred and has discharged to the waters of the State.

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PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Kraft Foods North America

POTW Name: City of Bentonville

Industry Contacts: Rich Holtquist, Plant Manager / A.J. Rorie, Business Unit Leader

Date and Time of Visit: 05-10-07 / 1425

Description of Manufacturing Process:  
Cheese production

Sources of Process Wastewater:  
Wastewater from the production of the cheese, cleanout of the milk truck tanks, and cleaning of the cheese production equipment.

Categorical Industry? No.

Basis for Limits: Local limits

Point of Application: At the discharge pipe

Description of Pretreatment Equipment and Procedures:  
pH neutralization of process wastewater by the automatic feed of caustic soda and/or sulfuric acid.

Spill Prevention and Solvent Management Procedures:  
Have an SPCC plan. Solvent used in parts washer is picked up by Safety Clean.

Sampling Location and Equipment:  
Sampled at the 3" Parshall Flume flow measurement device after treatment by use of a refrigerated Isco auto sampler.

## PPETS CODE SHEET

## PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>John A. Fazio</u>	
NAME OF FACILITY:	<u>City of Bentonville, Arkansas</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022403</u>	NPID
DATE OF PCI:	<u>May 10, 2007</u>	DTIA

## PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>4</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>0</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

# ADEQ

ARKANSAS  
Department of Environmental Quality

May 30, 2007

Belva Plumlee, Wastewater Utility Manager  
1901 N.E. A Street  
Bentonville, Arkansas 72712

RE: AFIN: 04-00154

NPDES Permit No.: AR0022403

Dear Ms. Plumlee:

On May 10, 2007, Dale Washam, Inspector Supervisor, James Eng, EPA, and I performed a routine pretreatment compliance evaluation inspection of the Bentonville waste water treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. This inspection revealed the following violations:

1. A comprehensive Industrial User Survey has not been updated as required by Part III.9 of your NPDES permit and 40 CFR 403.8.f.2.i;
2. Monthly pH and oil & grease grab samples taken by the City for monitoring industrial users have not been taken in accordance with the requirements of 40 CFR 403.12.b.5.iii. This condition requires using a minimum of four (4) grab samples for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organics;
3. According to Nancy Busen, the POTW has not been enforcing the following regulations and/or industrial user permit conditions:
  - Failure of the industrial users to take pH and oil & grease grab samples in accordance with the requirements of 40 CFR 403.12.b.5.iii;
  - Failure of the industrial users to calibrate their flow meters prior to collection of all flow proportioned composite samples in accordance with the requirements of their permits, where applicable;
  - Failure of Kraft Foods to properly perform their flow meter accuracy check. Rather than using the recorded and calculated flow rates in the percent error formula, recorded and measured head were used to attempt to measure flow meter accuracy. Recorded and calculated flow must be used in the percent error formula to ensure that the device is capable of measuring flows with a maximum deviation of less than +/- 10 % from true discharge rates;
  - Presence at Kraft Foods of either a bypass (during periods of high discharge rates) of effluent to the POTW before final treatment or a direct discharge of effluent to the waters of the State. A v-notch weir is present in an effluent receiving basin before the pH adjustment basins. Waste water level marks are present in this basin that document periodic discharges from this weir to a culvert that drains to either the sanitary sewer or to a storm drain. To where this discharge occurs must be investigated, and measures effective in preventing further occurrence of this discharge must be implemented immediately.

WATER DIVISION

Page Two  
Belva Plumlee  
AR0022403  
May 30, 2007

The above items require your immediate attention. Please submit a written response to these findings to the Enforcement Section of the Water Division when the violations have been corrected. This response should contain documentation describing the course of action taken to correct the items noted. These corrective actions should be completed as soon as possible, and the written response is due by June 21, 2007.

If I can be any assistance, please contact me at 479-267-0811, ext.16.

Sincerely,

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

John Fazio  
District Field Inspector  
Water Division

cc: Enforcement Branch  
Permits Branch



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

# NPDES Compliance Inspection Report

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

## 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"/> <input type="text" value="2"/> <input type="text" value="2"/> <input type="text" value="4"/> <input type="text" value="0"/> <input type="text" value="3"/>	11 <input type="text" value="0"/> 12 <input type="text" value="7"/> <input type="text" value="0"/> <input type="text" value="5"/> <input type="text" value="1"/> <input type="text" value="0"/>	17 <input type="text" value="P"/>	18 <input type="text" value="P"/>	19 <input type="text" value="T"/>	20 <input type="text" value="1"/>
Remarks					
<input type="text" value="A"/> <input type="text" value="F"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="0"/> <input type="text" value="4"/> <input type="text" value="-"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="1"/> <input type="text" value="5"/> <input type="text" value="4"/>					
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"/> <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) City of Bentonville Wastewater Treatment Plant 1901 NE A Street Bentonville, AR 72712	Entry Time /Date	Permit Effective Date
	0840 / 05-10-07	01-01-04
	Exit Time/Date	Permit Expiration Date
	1745 / 05-10-07	12-31-08
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Nancy Busen/Lab Supervisor and Pretreatment Coordinator/479-271-3160/479-271-3163	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Belva Plumlee/Wastewater Utility Manager/479-271-3160/479-271-3163 City of Bentonville 115 W. Central Bentonville, AR 72712	Outfall 001: N 36.39234 W -94.20352  Entrance: N 36.39100 W -94.20383	
Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

## Section C: Areas Evaluated During Inspection

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

<input type="text" value="N"/> Permit	<input type="text" value="N"/> Flow Measurement	<input type="text" value="N"/> Operations & Maintenance	<input type="text" value="N"/> Sampling
<input type="text" value="N"/> Records/Reports	<input type="text" value="N"/> Self-Monitoring Program	<input type="text" value="N"/> Sludge Handling/Disposal	<input type="text" value="N"/> Pollution Prevention
<input type="text" value="N"/> Facility Site Review	<input type="text" value="N"/> Compliance Schedules	<input type="text" value="U"/> Pretreatment	<input type="text" value="N"/> Multimedia
<input type="text" value="N"/> Effluent/Receiving Waters	<input type="text" value="N"/> Laboratory	<input type="text" value="N"/> Storm Water	<input type="text" value="N"/> Other:

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

- A comprehensive Industrial User Survey has not been conducted as required by the City's NPDES permit and the pretreatment regulations;
- Grab samples for pH and oil & grease have not been taken by the City as required by the pretreatment regulations;
- The POTW had not documented/enforced the following industrial users violations:
  - Permittees failure to take grab samples for pH and oil & grease in the manner required by the pretreatment regulations;
  - Permittees failure to calibrate flow meters at the frequency required by their permits, where applicable;
  - Kraft Foods failure to perform their flow meter accuracy check properly;
  - Kraft Foods bypass to the POTW or discharge of waste to the waters of the State. This must be investigated and corrected.
- Kraft Foods has allowed discharge of acid and caustic soda to the waters of the State.

Name(s) and Signature(s) of Inspector(s) John Fazio	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/ Fayetteville/479-267-0816/479-267-0819	Date 05/30/07
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date







-QL to Frank

POST

JUN 20 2007

MARKED

June 4, 2007

Mr. John Fazio  
District Field Inspector  
Water Division

RE: AFIN: 04-00154

NPDES Permit number: AR0022403

Dear Mr. Fazio:

The following is a response to the deficiencies noted in the pretreatment inspection on May 10, 2007.

In response to:

***1. A comprehensive Industrial User Survey has not been updated as required by Part III. 9 of NPDES permit # 0022403 and CFR 403.8.f.2.i;***

***and EPA CIR form Section A. # 3. Page 2***

15 survey forms were sent to all Wal-Mart facilities and Consumer Testing Laboratories in January 2007. Site specific survey forms are being prepared for vehicle maintenance and pest control facilities. These will be completed and mailed by mid-August 2007.

***2. Monthly pH and oil & grease samples taken by the City for monitoring industrial users have not been taken in accordance with the requirements of 40CFR 403.12.b.5.iii. This condition requires using a minimum of four (4) grab samples for pH, cyanide, total phenols, oil & grease, sulfide and volatile organics.***

***and EPA CIR form Section D # 7. Page 6***

As of June 1, 2007 all pH, oil & grease, cyanide, total phenols, sulfide and volatile organic samples will be taken in accordance with 40 CFR 403.12.b.5.iii using a minimum of 4 grab samples, except when pH is monitored continuously.

**EPA CIR form Section D. # 9 Page 6**

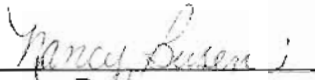
Kraft was checking the flow meter calibration to determine accuracy within 10% without converting the measurement to gallons. This practice was discontinued and depth measurements are now converted to gallons prior to calculating the 10% error - accuracy range.

Language will be change in permits to clarify the difference between calculation of a meter and checking the accuracy of the calibration.

3.

- As of June 1, 2007 all pH, oil & grease, cyanide, total phenols, sulfide and volatile organic samples will be taken in accordance with 40 CFR 403.12.b.5.iii using a minimum of 4 grab samples, except when pH is monitored continuously.
- Henceforth from the audit date of May 10, 2007 Kraft personnel will check calibration of their flow meter before each sampling event by using recorded and calculated flow data to assure accuracy of the meter within +/-10%.
- Investigation by Mr. Holtquist, Kraft manager with their maintenance department manager revealed that the 'V' notch weir at the receiving area of the treatment basin is connected to the sanitary sewer. It is for maintenance use when/if the basins have to be emptied for repair. It has been used in the distant past but not without prior notification to, and written permission from the POTW. Any use in the future will also be with prior approval from the POTW.  
For future clarification, we will ask that Kraft label the weir;  
**Direct Sewer Discharge!**  
**For Maintenance Use Only!**  
**Contact 479-271-3160 prior to discharge from this weir.**

I sincerely hope that these corrections will satisfy the concerns of this audit. As always, please feel free to contact me at any time at 479-271-3160.

  
Nancy Busen  
Lab & Pretreatment Supervisor  
City of Bentonville, WWTF

POST  
JUN 20 2007  
MARKEL