



A R K A N S A S
Department of Environmental Quality

December 27, 2007

David Jurgens, Water and Wastewater Director
City of Fayetteville-Paul R. Noland WWTP
113 W. Mountain
Fayetteville, AR 72701

RE: City of Fayetteville-Paul R. Noland WWTP

AFIN: 72-00102 NPDES Permit No.: AR0020010

Dear Mr. Jurgens:

On December 17, 2007, I performed a routine pretreatment compliance inspection of the 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 violation:

Custom Powder Coatings has a phosphatizing operation which falls under the core operations of the metal finishing pretreatment standards in 40 CFR 433. This facility must be permitted as a new source. Under 40 CFR 403.8(f)(1)(iii) "The POTW shall...control through permit... the contribution to the POTW by each IU to ensure compliance with applicable Pretreatment Standards and Requirements." This was addressed in the City of Fayetteville's pretreatment audit conducted by Allen Gilliam, State Pretreatment Coordinator, on November 14-16, 2006.

The above item requires your immediate attention. Please submit a written response to this finding to the Water Division Enforcement Section of this Department at the following address:

Water Division Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

This response should contain detailed 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 21, 2008.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

David Jurgens, City of Fayetteville-Paul R. Noland WWTP
December 27, 2007
Page 2

If I can be of any assistance, please contact me at 479-267-0811 ext 12 (west@adeq.state.ar.us).

Sincerely,

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

Alison West
District 1 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



Form Approved
OMB No. 2040-0003

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

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 0 0 1 0 11 12 0 7 1 2 1 7 17 18 P 19 S 20 1					
Remarks					
A F I N 7 2 - 0 0 1 0 2					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69	70 N	71 N	72 N	73 <input type="text"/> <input type="text"/> <input type="text"/>	74 75 <input type="text"/> <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 (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) City of Fayetteville-Paul R. Noland WWTP 1500 N. Fox Hunter Road Fayetteville, AR 72701	Entry Time/Date 8:45 a.m./12-17-07	Permit Effective Date 6-1-06
	Exit Time/Date 2:15 p.m./12-17-07	Permit Expiration Date 5-31-11
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Denise Georgio/Industrial Pretreatment Coordinator/479-443-3292/479-443-5613	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number David Jurgens/Water and Wastewater Director/479-575-8330/479-575-8257 City of Fayetteville 113 W. Mountain Fayetteville, AR 72701	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)

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

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

Custom Powder Coatings must be permitted as a new source; because, it has a phosphatizing operation.

Name(s) and Signature(s) of Inspector(s) Alison West <i>Alison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811 ext 12/479-267-0819	Date 12-26-07
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 Fayetteville

AFIN Number: 72-00102

NPDES Permit Number(s): AR0020010

Program Tracked under NPDES Permit Number: AR0020010

Fact Sheet Preparation Date: Unknown

Date of Last PCI/Audit: 2-1-06/November 14-16, 2006

Date of Last Annual Report: May 29, 2007

Name of Inspector: Alison West

Date PCI Performed: 12-17-07

Name, Title, and Telephone Number of Facility Representative:
Denise Georgio/Industrial Pretreatment Coordinator/479-443-3292

Name and Title of Other Participants: NA

Number of IUs Visited: 2

Name(s) of IUs Visited: K-D Tools, Pinnacle Foods

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. Cooper Power Systems was deleted.
Custom Powder Coating Services will be added January 1, 2008.
2. Has ADEQ or EPA been notified of these changes? Yes
3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes
4. What procedures are being used to update the IU Survey?
Review of newspaper/phonebook, permit reapplication
requirements, on-site inspections, citizen involvement,
industrial user questionnaires
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) 8
6. Number of Categorical Industrial Users: 4
7. How does the POTW determine the appropriate categorical standards to apply to an IU? IU information, Federal Register, EPA seminars and guidance manuals, EPA and State pretreatment personnel, SIC codes, and a description of the manufactures processes
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:
Marshalltown Tools	Metal Finishing	Phosphate Coating
K-D Tools	Metal Finishing	Zinc Plating
Elkhart Products	Copper Former	Drawing and Forming
Superior Industries	Metal Finishing	Alodine Coating and Chrome Plating

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, technically based

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/month</u>	<u>2/year</u>	<u>Not req.</u>	
Effluent:	<u>2/year</u>	<u>2/year</u>	<u>Not req.</u>	
Sludge:	<u>3/year</u>	<u>Not req.</u>	<u>Not req.</u>	<u>Sludge is being disposed at a landfill.</u>
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>Not req.</u>	
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>Not req.</u>	
Sludge:	<u>None</u>	<u>None</u>	<u>Not req.</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.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes
2. How many IU permits (or other control documents) have been issued? 8
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.
No, Custom Powder Coating
-
4. Does the control document contain the following items?
Files reviewed K-D Tools and Pinnacle Foods
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>1/year</u>	<u>1/year</u>
other SIUs	<u>1/year</u>	<u>1/year</u>
Inspection:		
categorical IUs	<u>1/year</u>	<u>1/year</u>
other SIUs	<u>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: 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: Good

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)? Yes
-
9. Are sampling and flow monitoring equipment properly maintained? Yes
-
10. Is the POTW keeping proper field notes and chain of custody forms? POTW is not keeping field notes once the final inspection report is completed. EPA recommends that field notes be discarded once the inspection report is completed.
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? Pretreatment officer utilizes a tickler file and a file folder system. Also, a computer calendar is used. All reports are reviewed by the pretreatment officer.
-
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, by the Industrial Pretreatment Coordinator
-

17. What are the POTW's procedures for following up violations?
Follow their formal enforcement response plan. Depending on the violation, by use of an informal notice, NOV, compliance order, cease and desist order, reimbursement of costs, fines judicial action, public notice in newspaper, etc.
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): N/A

19. Additional comments on the POTW's inspection and sampling procedures: Inspection and sampling procedures appear adequate. All facilities are inspected and sampled at least once per year. Field notes are recorded on a rough draft inspection form and later typed onto the final inspection report.
-
-
-
-
-
-

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, the facility has an approved formal enforcement plan.

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

Effluent limitations: NOV, Fine, CDO, CO, show cause hearing, Judicial action, suspend services, or revoke permit depending on the specifics of violation.

Late reports: Informal notice, NOV, fine-depending on the number of days the report is late

Unpermitted discharges: Informal notice, CO, NOV, CDO, Fine Depending if harm was caused at the POTW, to POTW personnel, or the public

Slug loads or spills: NOV, Fine, CDO, suspension of services, CO, or civil action depending if harm was caused or not

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)? There were no significant violators for 2006 reporting year.

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:
N/A	N/A	N/A	N/A
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:
Enforcement procedures appear adequate. There has not been any IU's in significant violation that required publishing in the newspaper for the 2001, 2002, 2003, 2004, 2005, and 2006 reporting years.
-
-

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
-
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? Yes
-
3. Does the POTW have copies of permits for IUs in other cities? N/A
-
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? N/A
-
5. Comments on multijurisdictional issues: _____
No SIU's in user cities.
-
-

H. EVALUATION AND COMMENTS

Custom Powder Coatings is a new industry that has not been issued a permit by the City of Fayetteville. Allen Gilliam, State Pretreatment Coordinator, conducted a pretreatment audit on November 14-16, 2006. In the Summary of Findings in his report dated January 31, 2007, Mr. Gilliam stated that this facility must be permitted as a new source; because, it has a phosphatizing operation. An application was submitted to the City of Fayetteville postmarked July 17, 2007. According to Denise Georgio, Industrial Pretreatment Coordinator, this industry's permit would be effective on January 1, 2008.

No industries have been in significant non-compliance and reported in the newspaper for the facility's reporting years or 2001, 2002, 2003, 2004, 2005, and 2006.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: K-D ToolsPOTW Name: City of FayettevilleIndustry Contacts: Richard VaughnDate and Time of Visit: 12-17-07/1:00 p.m.

Description of Manufacturing Process:

Fabricate and assemble automotive specialty tools using stamping, heat treat (process of controlled heating w/ addition of methanol for atmosphere control), black oil quench, zinc electroplating, and black oxide conversion.

Sources of Process Wastewater:

Zinc plating, heat treat, black oil and black oxide coating.

Categorical Industry? YesBasis for Limits: Technically based limitsPoint of Application: Outfall KDT-001

Description of Pretreatment Equipment and Procedures:

The wastewater treatment is divided into 2 processes: Black Oxide, black oil, mop rinse, and quench waste goes to a 2000 gallon holding tank with an oil skimmer; then, to a ph adjust tank. Then, to a solids settling tank before discharging to KDT 001. The Zinc plating wastes goes to a 2000 gallon holding tank with an oil skimmer. Ferric acid is added prior to a pH adjustment mix tank. Polymer is added at the end. The flocculated wastewater goes to a plate clarifier and to another inclined plate clarifier for additional polishing prior to discharge at KDT 001. The sludge from both processes is thickened and pumped to a frame filter press. Sludge cake is dried to reduce water content. Clean Harbors disposes sludge.

Spill Prevention and Solvent Management Procedures:

Has contingency plan that addresses accidental spills and discharges. Floor trenches to wastewater treatment.

Sampling Location and Equipment:

**KDT-001: In cleanout south of zinc plating line in b/w
wastewater clarifiers.**

Sampler: ISCO 2950GLS Sampler

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Pinnacle Foods Corporation

POTW Name: City of Fayetteville

Industry Contacts: Patrick Abshier-Environmental/PSM Manager

Date and Time of Visit: 12-17-07/12:15 p.m.

Description of Manufacturing Process:

The plant cuts up poultry and processes by frying and cooking poultry and beef to be packaged along with fruits, vegetables, and baked products. Produce frozen entrees, breakfast, and meat pies.

Sources of Process Wastewater:

Cooking, frying, processing poultry and meat, frozen meals assembly, and sanitation

Categorical Industry? No

Basis for Limits: Technically based limits

Point of Application: PFC-001, discharge pipe

Description of Pretreatment Equipment and Procedures:

Rotary screens for solids removal, oil skimmer, wastewater flow equalization tank, pH adjustment, and DAF unit for oil and grease removal.

Spill Prevention and Solvent Management Procedures:

Mobil spill kits, secondary containment, bermed drain in Chemical storage. Facility has a Spill Prevention Control and Countermeasure Plan and Pollution Prevention assessment.

Sampling Location and Equipment:

PFC-001-Prior to parshall flume on lower level of pretreatment facility that is located in the southwest corner of the waste stream building located on the north side of the property.

Sampler-ISCO 3710

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Alison West</u>	
NAME OF FACILITY:	<u>City of Fayetteville</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0020010</u>	NPID
DATE OF PCI:	<u>12-17-07</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>8</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>4</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>1</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



Form Approved
OMB No. 2040-0003

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

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 0 0 1 0 11 12 0 7 1 2 1 7 17 18 I 19 S 20 2					
Remarks					
0 0 2					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67	70 N	71 N	72 N	73	74 75

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Pinnacle Foods Corporation 1100 W. 15 th St. Fayetteville, AR 72701 City of Fayetteville-AR0020010	Entry Time/Date 12:15 p.m./12-17-07	Permit Effective Date NA
	Exit Time/Date 12:50 p.m./12-17-07	Permit Expiration Date NA
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Patrick Abshier/Environmental-PSM Manager/479-443-3451/479-443-0116	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Patrick Abshier/Environmental-PSM Manager/479-443-3451/479-443-0116 P.O. Box G Fayetteville, AR 72701	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	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	Y	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

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

No comments.

Name(s) and Signature(s) of Inspector(s) Alison West <i>Alison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811 ext 12/479-267-0819	Date 12-26-07
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**POTW Pretreatment Program
Industrial Site Visit**

Name of Industry: Pinnacle Foods Corporation

Industry Contacts: Patrick Abshier, Environmental-PSM Manager

Type of Industry: SIC Code-Frozen Specialties

Date of Visit: 12-17-06

- | | | | |
|--|---|-----------------------------|---|
| 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 type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" 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: _____

Visit Conducted By: Alison West Date: 12-17-07



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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 0 0 1 0 11 12 0 7 1 2 1 7 17 18 I 19 S 20 2					

Remarks

0 0 2

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 N	71 N	72 N 73	74 75

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Danaher Tool Group-Fayetteville Operation/K-D Tools 2900 City Lake Road Fayetteville, AR 72701 City of Fayetteville-AR0020010	Entry Time/Date 1:05 p.m./12-17-07	Permit Effective Date NA
	Exit Time/Date 1:45 p.m./12-17-07	Permit Expiration Date NA

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Richard Vaughn/Engineering Technician/479-442-7779 ext 308/479-442-7466	Other Facility Data
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Name, Address of Responsible Official/Title/Phone and Fax Number Dwight Canfield/Plant Manager/479-442-7779 ext 207/479-442-7466 Danaher Tool Group-Fayetteville Operation/K-D Tools 2900 City Lake Road Fayetteville, AR 72701	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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Section C: Areas Evaluated During Inspection

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

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

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

No comments.

Name(s) and Signature(s) of Inspector(s) Alison West <i>Alison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811 ext 12/479-267-0819	Date 12-26-07
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: K-D Tools

Industry Contacts: Richard Vaughn, Engineering Technician

Type of Industry: SIC Code 3423-Hand and Edge Tools

Date of Visit: 12-17-06

- | | | | |
|--|---|-----------------------------|---|
| 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: _____

Visit Conducted By: Alison West Date: 12-17-07



WATER AND WASTEWATER DEPARTMENT

#037482-AC
RECEIVED
JAN 28 2008

January 17, 2008

Water Division Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: City of Fayetteville – Paul R. Noland WWTP

AFIN: 72-00102 NPDES Permit No.: AR0020010

Dear Sir or Madam:

District 1 Field Inspector Alison West required in her letter of December 27, 2007 that we describe our course of action regarding permitting Custom Powder Coating Services as a new source.

We received State Pretreatment Coordinator Allen Gilliam's final audit report in early February 2007 requiring a permit for this industrial user and responded with the following:

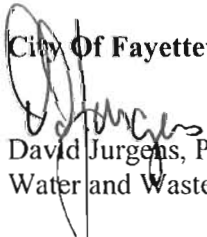
“Custom Powder Coatings claims they are not a categorical industrial user and therefore do not need to be permitted. We have contacted their chemical vendor who concurs and stated that industrial users with similar processes in Texas are not considered categorical. We are working to obtain documentation of the non-categorical determination from their regulatory authority on these industries. We will keep you informed on developments.”

Their vendor stated that the chemical is used at a pH high enough to not be considered a coating process, but instead just a cleaning process. Follow-up with two separate vendor-referenced customers, however, upheld the categorical determination. Custom Powder Coating Services was notified of the final determination as a categorical and provided with an industrial waste discharge permit application form.

We contacted Custom Powder Coating Services periodically to provide assistance in completing the application. Upon receipt of the completed application, we conducted a pre-permit inspection to verify and correct information provided. The draft permit was provided to Custom Powder Coating Services in November for their review and comment, and the permit was issued in December, 2007.

Feel free to contact me at (479) 575-8330 or djurgens@ci.fayetteville.ar.us with any questions.

Sincerely,

City Of Fayetteville

David Jurgens, P.E.
Water and Wastewater Director

Cc: Duyen Tran
Denise Georgiou