

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

MEMORANDUM

TO: Eric Fleming, Technical Assistance Manager

THRU: Dale Washam, Inspector Supervisor

FROM: Alison West, District Field Inspector

DATE: December 16, 2008

SUBJECT: Preformed Line Products Company

An industrial user inspection was conducted along with a spill response on November 19, 2008. Preformed Line Products Company in Rogers had a spill from a 4000 gallon galvanized wire cleaning tank on November 14, 2008, at ~11:15 a.m. According to Mr. Renfrow, the tank discharged for ~30 minutes before they realized the line was broken outside of the building. Mr. Renfrow stated that it normally takes approximately 40 minutes to discharge the tank. This water from the galvanized wire cleaning tank is dumped into city sewer once a month. The waste was discharged into the drainage ditch northwest of the pretreatment monitoring flume. According to Mr. Burns, the wastewater saturated the soil on the north side of the building; then, flowed down into the ditch and flowed west. It passed through a culvert underneath a building and discharged into a larger storm water ditch that flows SSW. HazMert was contacted to clean up the waste water. According to Mr. Burns, it was his understanding that HazMert collected 2000 gallons of product prior to a storm event. A total of 5800 gallons of waste and storm water was collected by HazMert. The waste was disposed at the City of Rogers POTW.

Mr. Burns states that the waste water is non-categorical; however, the galvanized wire cleaning tank was analyzed for zinc. According to the documents provided by Mr. Renfrow at Preformed Line, the zinc content is 15.1 mg/L. Also, I was given an MSDS sheet for ES-527 Soak Cleaner. It shows that this product is hazardous based on Sodium Hydroxide.

An email was received on December 1, 2008, from Tammie Hynum, Hazardous Waste Division, with the following information:

The zinc level of 15.1 ppm does not exceed the typical soil screening level we use to compare analytical data. There is not a standard soil screening level for sodium hydroxide. I would think the hazardous category listed on the MSDS might be related to the corrosive nature of the constituent. If the contamination is in the soils, the corrosive level would not be applicable at this point.



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

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

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="4"/> <input type="text" value="3"/> <input type="text" value="3"/> <input type="text" value="9"/> <input type="text" value="7"/> 11 <input type="text" value="0"/> <input type="text" value="8"/> <input type="text" value="1"/> <input type="text" value="1"/> <input type="text" value="1"/> <input type="text" value="9"/> 17 <input type="text" value="I"/> 18 <input type="text" value="S"/> 19 <input type="text" value="S"/> 20 <input type="text" value="2"/>	Remarks				
<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" value=""/> <input type="text" value=""/> <input type="text" value=""/> 69	70 <input type="text" value="N"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/> <input type="text" value=""/>	74 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 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>) Preformed Line Products Company (City of Roger AR0043397) 2740 South First St. Rogers, AR 72757-0808	Entry Time/Date 8:05 a.m./11-19-08	Permit Effective Date NA
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Steve Renfrow/Senior Industrial Engineer/479-636-7600/479-636-0769	Exit Time/Date 8:40 a.m./11-19-08	Permit Expiration Date NA
Name, Address of Responsible Official/Title/Phone and Fax Number Steve Renfrow/Senior Industrial Engineer/479-636-7600/479-636-0769 Preformed Line Products Company 2740 South First St. Rogers, AR 72757-0808	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Other Facility Data

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)

An industrial user inspection was conducted along with a spill response on November 19, 2008. Preformed Line in Rogers had a spill from a 4000 gallon galvanized wire cleaning tank on November 14, 2008, at ~11:15 a.m. According to Mr. Renfrow, the tank discharged for ~30 minutes before they realized the line was broken outside of the building. Mr. Renfrow stated that it normally takes ~40 minutes to discharge the tank. This water from the galvanized wire cleaning tank is dumped into city sewer once a month. The waste was discharged into the drainage ditch northwest of the pretreatment monitoring flume. According to Mr. Burns, the wastewater saturated the soil on the north side of the building; then, flowed down into the ditch and flowed west. It passed through a culvert underneath a building and discharged into a larger storm water ditch that flows SSW. HazMert was contacted to clean up the waste water. According to Mr. Burns, it was his understanding that HazMert collected 2000 gallons of product prior to a storm event. A total of 5800 gallons of waste and storm water was collected by HazMert. Waste was disposed at the City of Rogers POTW.

Mr. Burns states that the waste water is non-categorical; however, the galvanized wire cleaning tank was analyzed for zinc. According to the documents provided by Mr. Renfrow at Preformed Line, the zinc content is 15.1 mg/L. Also, I was given an MSDS sheet for ES-527 Soak Cleaner. It shows that this product is hazardous based on Sodium Hydroxide.

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 December 15, 2008
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Prefomed Line Products Company

Industry Contacts: Steve Renfrow, Senior Industrial Engineer

Type of Industry: NAICS 335932

Date of Visit: 11-19-08

- | | | | |
|--|---|-----------------------------|---|
| 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 checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 5. Proper solid waste disposal? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" 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 type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 9. Adequate spill prevention? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" 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: Facility has an aluminum wash tank with only treated waste. Rinse tank goes through the flume to city sewer. The wash tank for galvanized water is discharged once a month directly to city sewer.

Visit Conducted By: Alison West Date: 12-16-08

Water Division NPDES Photographic Evidence Sheet

Location:	Preformed Line Products Company						
Photographer:	Alison West			Witness:	None		
Photo #	1	Of	6	Date:	11-19-08	Time:	8:19 a.m.
Description:	IMG2042. Wash tank for galvanized water.						



Photographer:	Alison West			Witness:	None		
Photo #	2	Of	6	Date:	11-19-08	Time:	8:21 a.m.
Description:	IMG2043. Discharge of galvanized water through broken pipe.						



Water Division NPDES Photographic Evidence Sheet

Location:	Preformed Line Products Company						
------------------	---------------------------------	--	--	--	--	--	--

Photographer:	Alison West			Witness:	None		
----------------------	-------------	--	--	-----------------	------	--	--

Photo #	3	Of	6	Date:	11-19-08	Time:	8:21 a.m.
----------------	---	-----------	---	--------------	----------	--------------	-----------

Description:	IMGP2044. Area of discharge at broken pipe.						
---------------------	---	--	--	--	--	--	--



Photographer:	Alison West			Witness:	None		
----------------------	-------------	--	--	-----------------	------	--	--

Photo #	4	Of	6	Date:	11-19-08	Time:	8:21 a.m.
----------------	---	-----------	---	--------------	----------	--------------	-----------

Description:	IMGP2045. Waste was discharged into the drainage ditch northwest of the pretreatment monitoring flume.						
---------------------	--	--	--	--	--	--	--



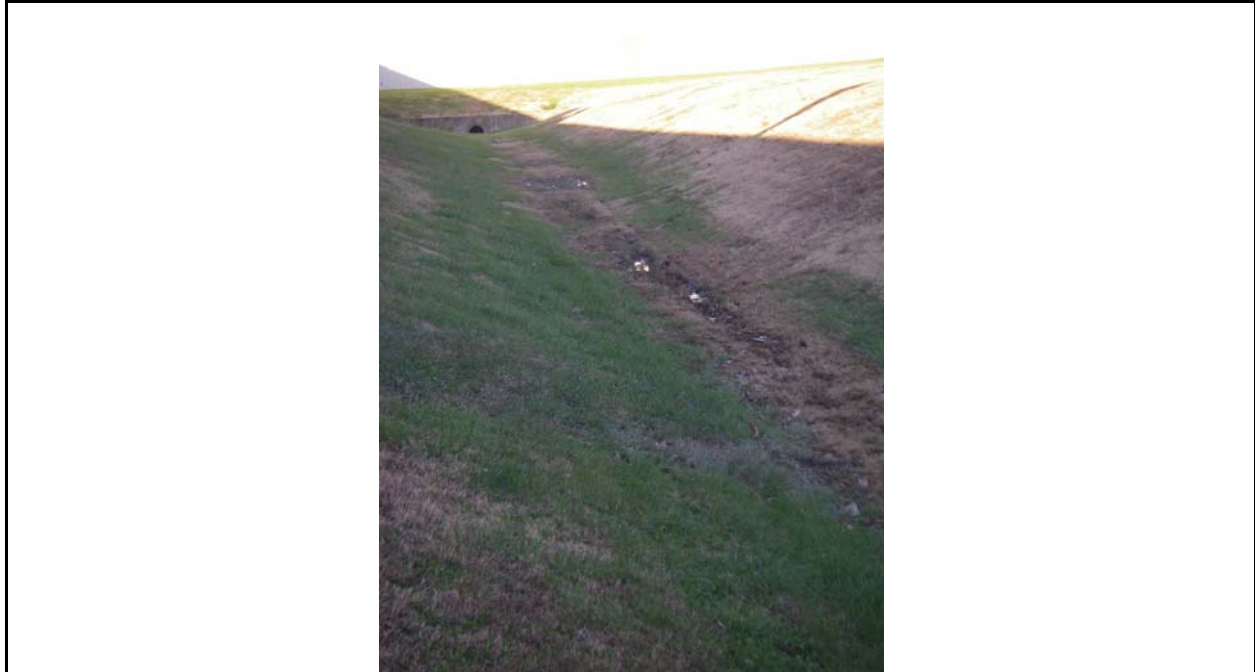
Water Division NPDES Photographic Evidence Sheet

Location: Preformed Line Products Company

Photographer: Alison West **Witness:** None

Photo # 5 **Of** 6 **Date:** 11-19-08 **Time:** 8:22 a.m.

Description: IMG2046. The waste passed through a culvert underneath a building.



Photographer: Alison West **Witness:** None

Photo # 6 **Of** 6 **Date:** 11-19-08 **Time:** 8:26 a.m.

Description: IMG2049. The waste discharged into a larger storm water drainage ditch that flows south/southwest.



ADEQ Water NPDES Inspection

AFIN: **NA**

Permit #: **NA**