



ARKANSAS
Department of Environmental Quality

June 18, 2009

Barrett E. Harrison, Mayor
City of Blytheville
P.O. Box 1784
Blytheville, AR 72315

RE: Pretreatment Compliance Inspection

RE: AFIN: 47-00544 NPDES Permit No.: AR0022560

Dear Mr. Harrison:

On May 20 and 21, 2009, 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 thereunder. This inspection revealed the following violations:

The Industrial User Survey has not been kept up-to-date. During the course of the inspection, the following three unpermitted and relatively unknown Industrial Users (IUs) were discovered.

- 1. Aviation Repair Technology**
- 2. Turbine Support International**
- 3. Kagome Creative Foods**

Additional information should be collected on these facilities with appropriate permitting action taken in response to the updated Industrial User Survey.

The City of Blytheville should review current procedures for updating the Industrial User Survey and make appropriate modifications to ensure that adequate information is collected and maintained on all new and existing IUs.

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Water Division Enforcement Branch Manager, of this Department. This response should be mailed to the address below. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response is due by **July 2, 2009**.

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

Barrett Harrison, Pretreatment Inspection
June 18, 2009
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If I can be of any assistance, please contact me at walker@adeq.state.ar.us or 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker
District 3 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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 N 2 5 3 A R 0 0 2 2 5 6 0 11 12 0 9 0 5 2 1 17 18 P 19 S 20 1	Remarks				
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 (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Pretreatment Program City of Blytheville Waste Water Treatment Plant Blytheville, AR Mississippi Co.	Entry Time/Date 0920 5/20/2009 0900 5/21/2009	Permit Effective Date December 1, 2005
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) James Yankee/Pretreatment Coordinator/870-763-4961 Kenneth Ellis/Waste Water Superintendent/870-763-4961	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Barrett Harrison/Mayor/870-763-3602 City of Blytheville P.O. Box 1784 Blytheville, AR 72316	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)

S	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)

*** See the attached PCI Report for a Summary of Findings/Comments ***

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date June 18, 2009
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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

Name of Municipality:	Blytheville, AR
AFIN Number:	47-00145
NPDES Permit Number(s):	AR0022560, AR0022578, AR0022586
Program Tracked under NPDES Permit Number:	AR0022560
Fact Sheet Preparation Date:	Revised as IU permits are renewed
Date of Last PCI/Audit:	May 28, 2008
Date of Last Annual Report:	August 29, 2008
Name of Inspector:	Brent L. Walker
Date PCI Performed:	May 20 & 21, 2009
Name, Title, and Telephone Number of Facility Representative:	James L. Yankee, Pretreatment Coordinator, 870-763-4961
Name and Title of Other Participants:	Kenneth Ellis, WWTP Superintendent
Number of IUs Visited:	4
Name(s) of IUs Visited:	Advance Industries, Kagome Creative Foods, Turbine Support International, Aviation Repair Technologies
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
2.	Has ADEQ or EPA been notified of these changes?	N/A
3.	HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?	No
4.	What procedures are being used to update the IU Survey?	
	Review of Water and Sewer Connections	
	Chamber of Commerce	
	Airport Authority	
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)	6
6.	Number of Categorical Industrial Users:	4
7.	How does the POTW determine the appropriate categorical standards to apply to an IU?	SIC Code
8.	List all categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (such 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:
	Motor Appliance	Metal Finishing
	Motor Technologies	Metal Finishing
	Omnium	Pesticide Formulation
	SRT	Metal Finishing
		Regulated Process:
		Parts cleaning
		Parts cleaning
		Clean-up
		Anodizing

B. LOCAL LIMITS

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

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/yr</u>	<u>4/yr</u>	<u>N/A</u>	<u>--</u>
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>N/A</u>	<u>--</u>
Sludge:	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>No disposal</u>
Organics:				
Influent:	<u>1/yr</u>	<u>1/yr</u>	<u>N/A</u>	<u>--</u>
Effluent:	<u>1/yr</u>	<u>1/yr</u>	<u>N/A</u>	<u>--</u>
Sludge:	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>No Disposal</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 inhibitions or upsets due to IUs.

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?	6
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 - clarified further as new permits issued.
	Type of sample:	Yes
	Monitoring frequency:	Yes
	Bypass prohibition:	Yes - City ordinance
	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	2/yr	N/A	
other SIUs	2/yr	N/A	
Inspection:			
categorical IUs	2/yr	N/A	
other SIUs	2/yr	N/A	
2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?			
		Yes as required by IU Permit	
3. Are inspections announced or unannounced?			
		Both	
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:			
		Adequate	

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?	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 BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? The pretreatment coordinator receives the reports and reviews for errors and non-compliances. Tracking is done manually since there is a small number is SIUs.	
15.	ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?	N/A
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?	
	Notice of Violation followed by surcharges or fines if required or appropriate.	
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):	Yes
19.	Additional comments on the POTW's inspection and sampling procedures:	
	None	

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: According to a written enforcement plan
	Late reports: According to a written enforcement plan
	Unpermitted discharges: Written enforcement plan
	Slug loads or spills: According to a written enforcement plan
	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)?
	Yes
	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:
Nibco Inc.	Overflow	NOV	11/24/2008

5.	Comments on the POTW's enforcement procedures:
	Appears adequate at this time.
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: N/A
2.	Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? N/A
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: N/A

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry:	Aviation Repair Technologies
POTW Name:	City of Blytheville
Industry Contacts:	Mike Castle - General Manager - 870-824-4014
Date and Time of Visit:	1045 5/21/2009
Description of Manufacturing Process:	Airplane cleaning and minor repair.
Sources of Process Wastewater:	Dry processes - no process wastewater. The City of Blytheville will need to review to determine permitting needs.
Categorical Industry?	No
Basis for Limits:	N/A
Point of Application:	N/A
Description of Pretreatment Equipment and Procedures:	None
Spill Prevention and Solvent Management Procedures:	Dedicated chemical storage area
Sampling Location and Equipment:	N/A

Name of Industry:	Turbine Support International
POTW Name:	City of Blytheville
Industry Contacts:	Kevin Hill - General Manager - 870-824-1847 Mike Castle - Gen. Manager ART - 870-824-4014
Date and Time of Visit:	1045 5/21/2009
Description of Manufacturing Process:	Jet Turbine Disassembly/Salvage (Metal Cleaning)
Sources of Process Wastewater:	Parts washing - process is very similar to that of a categorical metal finishing facility. The City of Blytheville will need to review to determine permitting needs.
Categorical Industry?	Potentially (Currently Unpermitted)
Basis for Limits:	N/A
Point of Application:	N/A
Description of Pretreatment Equipment and Procedures:	N/A
Spill Prevention and Solvent Management Procedures:	Parts washing tanks are surrounded by a concrete berm. Facility currently has <u>unprotected</u> open floor drains. Dedicated waste oil storage area.
Sampling Location and Equipment:	N/A

Name of Industry:	Kagome Creative Foods
POTW Name:	City of Blytheville
Industry Contacts:	Steve Whitmire-Facility Manager-870-532-6192
Date and Time of Visit:	0950 5/21/2009
Description of Manufacturing Process:	Food Processing/Packaging repackages peanut butter for retail and manufactures and packages various sauces.
Sources of Process Wastewater:	Equipment washdown
Categorical Industry?	No
Basis for Limits:	N/A
Point of Application:	N/A
Description of Pretreatment Equipment and Procedures:	Oil and water separation
Spill Prevention and Solvent Management Procedures:	None
Sampling Location and Equipment:	N/A

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry:	Advance Industries
POTW Name:	City of Blytheville
Industry Contacts:	Gerald Lloyd - Maintenance (Not contacted)
Date and Time of Visit:	1345 5/21/2009
Description of Manufacturing Process:	Industrial laundry
Sources of Process Wastewater:	Washing machine wash water
Categorical Industry?	No
Basis for Limits:	City ordinance and pretreatment program
Point of Application:	Prior to connection to city sewer
Description of Pretreatment Equipment and Procedures:	Oil and water separation followed by pH adjustment
Spill Prevention and Solvent Management Procedures:	Very little chemicals on-site; no open floor drains
Sampling Location and Equipment:	Manhole #5 at city connection

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	Brent L. Walker	
NAME OF FACILITY:	City of Blytheville	
PERMIT NUMBER USED TO TRACK PROGRAM:	AR0022560	NPID
DATE OF PCI:	May 20 & 21, 2009	DTIA
PPETS WENDB DATA ELEMENTS		
NUMBER OF SIGNIFICANT IUS (SIUS):	6	SIUS
NUMBER OF CATEGORICAL IUS:	4	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	0	NOIN
SIUS WITHOUT CONTROL MECHANISM:	0	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	1	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	0	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	0	SNIN

MAYOR:
Barrett Harrison

CITY COUNCIL:
Ray L. Jones
Shirley Conneally
Shirley Overman
Monte Hodges
Mylas Jeffers
Carol White

ATTORNEY:
Mike Bearden

**PUBLIC UTILITIES
DIRECTOR:**
Rick Mosley

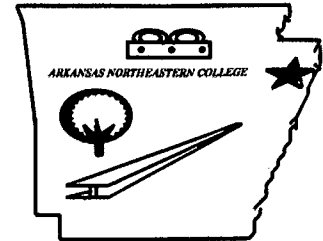
SUPERINTENDENT:
Kenneth Ellis

Blytheville Wastewater Dept.

P.O. Box 1784
Blytheville, AR 72316-1784

Phone: (870) 763-4961

Fax: (870) 763-8541



July 2, 2009

Cindy Garner
ADEQ Water Division Enforcement Manager
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Pretreatment Compliance Inspection Response

Re: AFIN: 47-00544

NPDES Permit No: AR0022560

Dear Ms. Garner:

Aviation Repair Technology, Turbine Support International, and Kagome Creative Foods are located on the old Eaker Air Base property which is overseen by the Airport Authority. The Airport Authority has a copy of the City of Blytheville's Pretreatment Ordinance and was informed to copy this for future business or industry that maybe locating on the airbase buildings. We are also looking into employing the help of Code Enforcement to help in keeping up to date on industrial and commercial users that may establish their business within the City limits.

1. **Aviation Repair Technology** has submitted an industrial wastewater discharge permit application.
2. **Turbine Support International** has received a wastewater survey as well as an industrial wastewater permit application.
3. **Kagome Creative Foods** has received a wastewater survey as well as an industrial wastewater permit application.

Each potential I.U. has 30 days to complete and return the above listed information to determine their permitting status at which time a BMR will be completed if needed.

If you need more information, please contact me at (870) 763-4961.

Sincerely,

A handwritten signature in black ink, appearing to read "James Yankee". The signature is stylized with a large, sweeping initial "J" and a long, horizontal flourish extending to the right.

James Yankee
Pretreatment Coordinator
Blytheville Wastewater Department

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Blytheville, Arkansas Post

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Cindy Garner
 ADEO Water Division Enforcement Manager
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