

ADEQ

ARKANSAS
Department of Environmental Quality

January 18, 2011

David Jurgens, Utilities Department Director
City of Fayetteville-Paul R. Noland WWTP
113 W. Mountain
Fayetteville, AR 72701

RE: City of Fayetteville-Paul R. Noland WWTP

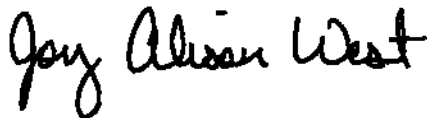
AFIN: 72-00102 NPDES Permit No.: AR0020010

Dear Mr. Jurgens:

On December 10 and 13, 2010, 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 that you are in compliance with the terms of your permit.

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

Sincerely,



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 1 0 1 2 1 0 17 18 P 19 S 20 1 | | | | | |
| Remarks | | | | | |
| A F I N 7 2 - 0 0 1 0 2 0 0 2 C | | | | | |
| 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 1400 N. Fox Hunter Road Fayetteville, AR 72701 | Entry Time/Date 8:40 a.m./12-10-2010 9:30 a.m./12-13-2010 | Permit Effective Date 6-1-06 |
| | Exit Time/Date 3:45 p.m./12-10-2010 1:20 p.m./12-13-2010 | Permit Expiration Date 5-31-11 |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Duyen Tran/Plant Manager/479-443-3292/479-443-5613 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 | S 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)

Facility is in compliance with the permit.

| | | |
|--|---|-------------------------|
| 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 1-3-2011 |
| 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, AR0020010C, AR0050288, ARR00C377

Program Tracked under NPDES Permit Number: AR0020010

Fact Sheet Preparation Date: Unknown

Date of Last PCI/Audit: December 17, 2007/October 19-22, 2009

Date of Last Annual Report: May 2010

Name of Inspector: Alison West

Date PCI Performed: December 10 and 13, 2010

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

Name and Title of Other Participants: NA

Number of IUs Visited: 2

Name(s) of IUs Visited: Ayrshire Electronics, Marshalltown Company

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.

K-D Tools was voided November 21, 2009.

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, review of water billing records

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

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 |
| Custom Powder Coating | Metal Finishing | Phosphating |
| Elkhart Products | Copper Former | Drawing and Forming |
| Superior Industries | Metal Finishing | Phosphating |

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, technically based. POTW is in the process of redoing local limits.

2. Describe any apparent problems with the local limits. In 2008, split flow between two plants. Lost K-D Tools. Superior dropped chrome plating. Local limits are outdated. Custom Powder Coating was permitted to discharge to Fayetteville.

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 Permit: | Requirement in Program: | Comments: |
|------------|----------------|------------------------|-------------------------|--|
| 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>1/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>1/year</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.
Yes
-
4. Does the control document contain the following items?
Files reviewed Marshalltown Tools and Ayrshire Electronics
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

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 2009. At the time of the investigation, there were no significant violators for 2010.

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 2009.
-
-
-

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.
-
-

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Marshalltown Company

POTW Name: City of Fayetteville

Industry Contacts: Robert O'Connel

Date and Time of Visit: 12-13-2010/11:00 a.m.-11:55 a.m.

Description of Manufacturing Process:

Manufactures hand and edge tools for cement finishing and masonry.

Sources of Process Wastewater:

Dust collectors, neutralized etching solution, washing, grinding, painting, and vibrating finisher.

Categorical Industry? Yes, metal finishing

Basis for Limits: Combined Waste Stream

Point of Application: End of pipe

Description of Pretreatment Equipment and Procedures:

pH adjustment, dust collectors, filtration and settling

Spill Prevention and Solvent Management Procedures:

Facility has developed a Toxic Organics, Storm Water, and Pollution Prevention & Emergency Responses Contingency Plan.

Sampling Location and Equipment:

MTT001 is the manhole located 221 feet east of the loading dock on the east side of the phase 1 building. Sampling is performed by a contract lab.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Ayrshire Electronics, LLC

POTW Name: City of Fayetteville

Industry Contacts: Tim Pearce, VP of Engineering

Date and Time of Visit: 12-13-10/9:35 a.m.-10:35 a.m.

Description of Manufacturing Process:
Assemble printed circuit boards and metal parts.

Sources of Process Wastewater:
Wave solder, occasional stencil cleaning, reflow soldering

Categorical Industry? N/A

Basis for Limits: Performance Based Limits

Point of Application: End of process

Description of Pretreatment Equipment and Procedures:
Sedimentation tank

Spill Prevention and Solvent Management Procedures:
Facility has a solvent toxic organic management plan and spill prevention plan.

Sampling Location and Equipment:
Location 001: the sampling tank after the flume in the treatment building off the north side of the plant.

Sampling and analysis performed by contract lab.

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>December 10 and 13, 2010</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>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
OMB No. 2040-0003

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 1 0 1 2 1 3 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 (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Ayrshire Electronics, LLC 1101 S. Beechwood Fayetteville, AR 72701 City of Fayetteville-AR0020010 | Entry Time/Date 9:35 a.m./12-13-10 | Permit Effective Date NA |
| | Exit Time/Date 10:35 a.m./12-13-10 | Permit Expiration Date NA |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tim Pearce/VP of Engineering/479-442-5356 ext 2113 | Other Facility Data | |
| Name, Address of Responsible Official/Title/Phone and Fax Number Tim Pearce/VP of Engineering/479-442-5356 ext 2113 Ayrshire Electronics, LLC 1101 S. Beechwood 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)

Uncovered floor drains were observed in the area of the wave solder and material storage area. A 55 gallon drum of Xylene and containers of raw material of conformal coating were approximately 30 feet from an uncovered floor drain. The raw material of conformal coating containers was stored on a shelf. The drum of Xylene had no secondary containment. The uncovered floor drains discharge to the storm sewer. On January 3, 2011, I spoke with Mr. Pearce. Mr. Pearce informed me the Xylene is now stored in a chemical storage building. Mr. Pearce stated that the floor drains will be sealed in the next two weeks. I informed Mr. Pearce to conduct a thorough walk through to determine if there are any other uncovered floor drains where pollutants may discharge to the storm sewer.

| | | |
|--|---|---------------------------|
| 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 12-20-2010 |
| Signature of Reviewer | Agency/Office/Phone and Fax Numbers | Date |

POTW Pretreatment Program
Industrial Site Visit

Name of Industry: Ayrshire Electronics, LLC

Industry Contacts: Tim Pearce, VP of Engineering

Type of Industry: SIC Code-3672 Printed Circuit Boards

Date of Visit: 12-13-2010

- | | | | |
|--|---|--|---|
| 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 type="checkbox"/> Yes | <input checked="" 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:

Uncovered floor drains were observed in the area of the wave solder and material storage area. A 55 gallon drum of Xylene and containers of raw material of conformal coating were approximately 30 feet from an uncovered floor drain. The raw material of conformal coating containers was stored on a shelf. The drum of Xylene had no secondary containment. The uncovered floor drains discharge to the storm sewer. On January 3, 2011, I spoke with Mr. Pearce. Mr. Pearce informed me the Xylene is now stored in a chemical storage building. Mr. Pearce stated that the floor drains will be sealed in the next two weeks. I informed Mr. Pearce to conduct a thorough walk through to determine if there are any other uncovered floor drains where pollutants may discharge to the storm sewer.

Visit Conducted By: Alison West

Date: 12-13-2010



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

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| 1 N 2 5 3 A R 0 0 2 0 0 1 0 11 12 1 0 1 2 1 3 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 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) Mashalltown Company 2200 Industrial Drive Fayetteville, AR 72701 City of Fayetteville-AR0020010 | Entry Time/Date 11:00 a.m./12-13-10 | Permit Effective Date NA |
| | Exit Time/Date 11:55 a.m./12-13-10 | Permit Expiration Date NA |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Robert O' Connell/Manufacturing Engineering Manager/479-521-8787 | Other Facility Data | |
| Name, Address of Responsible Official/Title/Phone and Fax Number Robert O' Connell/Manufacturing Engineering Manager/479-521-8787 Mashalltown Company 2200 Industrial Drive 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 12-13-10 |
| Signature of Reviewer | Agency/Office/Phone and Fax Numbers | Date |

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Marshalltown Company

Industry Contacts: Robert O' Connell, Manufacturing Engineering Manager

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

Date of Visit: 12-13-10

- | | | | |
|--|---|-----------------------------|---|
| 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 checked="" type="checkbox"/> N/E |
| 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: 12-13-10