



ARKANSAS  
Department of Environmental Quality

June 22, 2011

James Sanders, 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. Sanders:

On May 26, 2011, fellow inspector Michael Greenway and 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:

1. During the course of the PCI, it was discovered that the City of Blytheville does not have adequate data or **BMRs** for Aviation Repair Technologies which has the potential to cause a significant impact **and/or** damage to the collection system and POTW. 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**.
2. Kagome Creative Foods has removed previously installed **O&G** (oil and grease) removal equipment, yet is continuing to operate at least two **production/packaging** lines.
3. Omnium was not sampled for **O&G**, Total Cyanide, TSS, pH, & **BOD5** as required by their permit.
4. Kagome Creative Foods has not been published in the newspaper as a Significant Violator for their discharge of peanut butter to the West WWTP (**O&G** Violations).

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The above items require your immediate attention. Please submit a written response to these findings to Water Division Enforcement Branch of this Department. This response should be mailed to the address below and 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, 2011**.

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

If I can be of any assistance, please contact me at [walker@adeq.state.ar.us](mailto: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



**Industrial User Site Visit**

Name of Industry: Omnium

Industry Contacts: Paul Vickerson – Plant Manager / Travis Holmes – Quality-Laboratory Leader

Type of Industry: Pesticide Formulation

Date of Visit: May 26, 2011

- |   |            |     |          |    |          |     |
|---|------------|-----|----------|----|----------|-----|
| 1. Significant industrial user?                       | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 2. Pretreatment equipment or procedures?              | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 3. Pretreatment equipment maintained and operational? | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 4. Hazardous waste generated or stored?               | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 5. Proper solid waste disposal?                       | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 6. Solvent management/TTO control?                    | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 7. Suitable sampling location?                        | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 8. Appropriate self-monitoring procedures/equipment?  | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 9. Adequate spill prevention?                         | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 10. Industry familiar with limits and requirements?   | <u> X </u> | Yes | <u> </u> | No | <u> </u> | N/A |

**Additional Comments:**

Facility representatives appeared familiar with the pretreatment program.

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Visit Conducted by: Brent L. Walker *Brent L. Walker* & Michael B. Greenway Date: 5/27/2011