



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).**

James Sanders, Pretreatment Inspection
June 22, 2011
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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 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 1 1 0 5 2 6 17 18 P 19 S 20 1 | Remarks | | | | |
| | | | | | -----Reserved----- |
| Inspection Work Days | Facility Evaluation Rating | BI | QA | | |
| 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"/> 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>) Pretreatment Program City of Blytheville Waste Water Treatment Plant Blytheville, AR Mississippi Co. | Entry Time/Date 1020 5/26/2011 | 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 | Exit Time/Date 1740 5/26/2011 | Permit Expiration Date November 30, 2010 |
| Name, Address of Responsible Official/Title/Phone and Fax Number James Sanders/Mayor/870-763-3602 City of Blytheville P.O. Box 1784 Blytheville, AR 72316 | Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Other Facility Data |

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> Michael B. Greenway | Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax) | Date May 27, 2011 |
| 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: | 47-00544 |
| 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: | June 22-24, 2010 (Audit) |
| Date of Last Annual Report: | September 2, 2010 |
| Name of Inspector: | Brent L. Walker and Michael B. Greenway |
| Date PCI Performed: | May 26, 2011 |
| 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: | 5 |
| Name(s) of IUs Visited: | Advance Industries, Kagome Creative Foods, Omnium, 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. TSI and Kagome Creative Foods added since last PCI | | |
| 2. Has ADEQ or EPA been notified of these changes? | | Yes |
| 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/Drive By Chamber of Commerce, City Clerk Business Permits 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) | | 8 |
| 6. Number of Categorical Industrial Users: | | 5 |
| 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: | Regulated Process: |
| Motor Appliance | Metal Finishing | Parts cleaning |
| Motor Technologies | Metal Finishing | Parts cleaning |
| Omnium | Pesticide Formulation | Clean-up |
| Siemens (Formerly SRT) | Metal Finishing | Anodizing |
| TSI | Metal Finishing | Parts cleaning |
| | | |
| | | |
| | | |
| | | |

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes - language in program, but no numerical limits; - allows for setting of limits as necessary

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?
Yes, Kagome Creative Foods discharged large volume of peanut butter to the West Treatment Plant; Given a compliance schedule including the installation of an O&G Removal System

| | | |
|---|--|---|
| 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? | 8 (Including Kagome Creative Foods) |
| 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 - 3 expire December 31, 2011, renewal applications have been sent and are due 90 days prior to expiration | |
| 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: | N/A |
| | IU reporting requirements: | N/A |
| 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 | >1/yr | | N/A |
| other SIUs | >1/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: | | N/A | |
| Observation of IU self-monitoring procedures: | | N/A | |
| Verification that approved analytical techniques are used: | | N/A | |
| Verification of IU flow measurement (where required): | | N/A | |
| 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). No, not sampling Omnium for O&G, Total Cyanide, TSS, pH, BOD5 - pesticides were sampled |
| 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 (Review of TSI's BMR) |
| | | |
| | Other environmental permits held: | Yes |
| | | |
| | Description of operations: | Yes |
| | | |
| | Process flow diagrams: | No discharge - diked tanks |
| | | |
| | 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: | |
| | Suggested more detail be included in inspection reports; must complete required sampling for Omnium | |
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| E. Enforcement | | | |
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| 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)? | | | |
| | | | No - Kagome Creative Foods not published yet. |
| | | | |
| | | | |
| 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: |
| Kagome | O&G | NOV | 11/30/2010 |
| | | | |
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| 5. | Comments on the POTW's enforcement procedures: |
| | Need to publish Significant Violators; |
| | Otherwise appears adequate at this time. |
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| 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 (ART) |
| POTW Name: | City of Blytheville |
| Industry Contacts: | Rick Uber/VP-Gen. Manager/870-532-0402 |
| Date and Time of Visit: | 5/26/2011 @ 1510 |
| Description of Manufacturing Process: | Airplane cleaning and minor repair. |
| Sources of Process Wastewater: | Exterior washing, otherwise mostly dry processes with 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 areas |
| Sampling Location and Equipment: | N/A |

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

| | |
|---|--|
| Name of Industry: | Turbine Support International |
| POTW Name: | City of Blytheville |
| Industry Contacts: | Joe Mras/VP-General Manager/870-532-5924 Ron Bemis/Quality Manager/870-532-5924 |
| Date and Time of Visit: | 5/26/2010 @ 1445 |
| Description of Manufacturing Process: | Jet Turbine Disassembly/Salvage (Metal Cleaning) |
| Sources of Process Wastewater: | *No Discharge* Parts washing - Categorical Metal Finisher |
| Categorical Industry? | Metal Finisher |
| Basis for Limits: | 40 CFR, City Ordinance & Pretreatment Program |
| 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. Sealed floor drains in disassembly area. Dedicated waste oil storage area. |
| Sampling Location and Equipment: | N/A |

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

| | |
|---|---|
| Name of Industry: | Kagome Creative Foods |
| POTW Name: | City of Blytheville |
| Industry Contacts: | Don Entenman/R&D Director/870-532-6192 |
| Date and Time of Visit: | 5/26/2011 @ 1420 |
| 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: | City Ordinance & Pretreatment Program |
| Point of Application: | Prior to connection to city sewer |
| Description of Pretreatment Equipment and Procedures: | Previously installed O&G removal equipment has been removed Old grease trap still in place, but may not be operational |
| Spill Prevention and Solvent Management Procedures: | Not evaluated |
| Sampling Location and Equipment: | N/A - pretreatment equipment removed |

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: | 5/26/2011 @ 1400 |
| 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 pH adjustment equipment no longer necessary |
| Spill Prevention and Solvent Management Procedures: | Very little chemicals on-site; no open floor drains |
| Sampling Location and Equipment: | Manhole #5 at city connection |

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

| | |
|---|--|
| Name of Industry: | Omnium |
| POTW Name: | City of Blytheville |
| Industry Contacts: | Travis Holmes/Quality-Lab Leader/870-763-2022 Paul Vickerson/Plant Manager |
| Date and Time of Visit: | 5/16/2011 @ 1325 |
| Description of Manufacturing Process: | Pesticide Formulation |
| Sources of Process Wastewater: | Water from Lab, equipment cleanup and wash downs |
| Categorical Industry? | Yes |
| Basis for Limits: | 40 CFR, City Ordinance & Pretreatment Program |
| Point of Application: | Prior to connection to city sewer |
| Description of Pretreatment Equipment and Procedures: | Batch tank treatment, sand and carbon filters, Sample tested before discharge |
| Spill Prevention and Solvent Management Procedures: | No floor drains, curbs around storage areas, no solvents |
| Sampling Location and Equipment: | Storage tank in lower level of building or manhole by entrance gate |

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 26, 2011 | DTIA |
| PPETS WENDB DATA ELEMENTS | | |
| NUMBER OF SIGNIFICANT IUS (SIUS): | 8 | SIUS |
| NUMBER OF CATEGORICAL IUS: | 5 | 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 |