



A R K A N S A S
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
Page 2

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



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	2	5	6	0	11	12	1	1	0	5	2	6	17	18	I	19	S	20	2															
Remarks																																											
0				0				5				C																															
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 (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Kagome Creative Foods, Inc. IU of Blytheville – AR0022560 2705 Casper St. Blytheville, AR Mississippi Co.		Entry Time/Date 1420 5/26/2011	Permit Effective Date December 1, 2005
		Exit Time/Date 1440 5/26/2011	Permit Expiration Date November 30, 2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Don Entenman/Research and Development Director/870-532-6192		Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Don Entenman/Research and Development Director/870-532-6192 Kagome Creative Foods, Inc. 2705 Casper St. Blytheville, AR 72315		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)

Permit	Flow Measurement	Operations & Maintenance	Sampling
Records/Reports	Self-Monitoring Program	Sludge Handling/Disposal	Pollution Prevention
Facility Site Review	Compliance Schedules	Pretreatment	Multimedia
Effluent/Receiving Waters	Laboratory	Storm Water	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See the attached IU Site Visit form and the PCI Inspection Report from this date for additional information

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

Industrial User Site Visit

Name of Industry: Kagome Creative Foods, Inc.

Industry Contacts: Don Entenman/Research and Development Director/870-532-6192

Type of Industry: Food Processing/Packaging

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> </u> | Yes | <u> X </u> | No | <u> </u> | N/A |
| 3. Pretreatment equipment maintained and operational? | <u> </u> | Yes | <u> </u> | No | <u> X </u> | N/A |
| 4. Hazardous waste generated or stored? | <u> </u> | Yes | <u> X </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> </u> | Yes | <u> </u> | No | <u> X </u> | N/A |
| 7. Suitable sampling location? | <u> </u> | Yes | <u> </u> | No | <u> X </u> | N/A |
| 8. Appropriate self-monitoring procedures/equipment? | <u> </u> | Yes | <u> </u> | No | <u> X </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> </u> | Yes | <u> X </u> | No | <u> </u> | N/A |

Additional Comments:

Facility was previously permitted, but is in the process of shutting down operations at this location.
Pretreatment equipment has been removed, but the facility is still operating two production/packaging lines.
Old grease trap is in place, but may not be operational.

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