



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

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	1	7	7	6	11	12	1	1	1	1	1	0	17	18	P	19	S	20	1	
Remarks																													
0	0	1	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 (For industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time /Date		Permit Effective Date	
City of Nashville Hwy 27 ~ 1/2 mile south of town		0855 / 11-10-2011		February 1, 2009	
		Exit Time/Date		Permit Expiration Date	
		1156 / 11-10-2011		January 31, 2014	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)				Other Facility Data	
Ed Carlyle, Jr. / Pretreatment Coordinator / (870) 845-7402				PCI	
Name, Address of Responsible Official/Title/Phone and Fax Number				Contacted	
Larry Dunaway / Public Works Director / (870) 845-4015 426 North Main Street Nashville, AR 71852				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	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Sampling
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

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

See attached report.

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Telephone/Fax		Date	
Shan Lynch <i>Shan Lynch</i>		ADEQ / Dist. 7 / 870 389-6970		November 18, 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 Nashville**

AFIN Number: **31-00036**

NPDES Permit Number(s): **AR0021776**

Program Tracked under NPDES Permit Number: **AR0021776**

Fact Sheet Preparation Date: **NA**

Date of Last PCI/Audit: **PCI / November 4, 2009**

Date of Last Annual Report: **NA**

Name of Inspector: **Shan Lynch**

Date PCI Performed: **November 10, 2011**

Name, Title, and Telephone Number of Facility Representative:

Ed Carlyle, Jr. / Pretreatment Coordinator / (870) 845-7402

Name and Title of Other Participants: **None**

Number of IUs Visited: **1**

Name(s) of IUs Visited: **Aero-Incorporated**

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. **Aero is still permitted but does not discharge to the City.**

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?
Water dept. notifies of new connections; newspaper; city council meetings; manhole inspections; phone book listings; city personnel; city plumbing inspector

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) **2**

6. Number of Categorical Industrial Users: **2**

7. How does the POTW determine the appropriate categorical standards to apply to an IU? **Federal regulations**

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:
Jan-Eze Plating	Metal finisher	Polishing, plating

Aero-Incorporated	Metal finisher	Electroplating
* No discharge		

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? No, facility using categorical limits. A completed TRE from CEA (Civil Engineering Associates) and is awaiting Local Limit determination from ADEQ.

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 / year</u>	<u>4 / year</u>	<u>quarterly</u>	
Effluent:	<u>4 / year</u>	<u>4 / year</u>	<u>quarterly</u>	
Sludge:	<u>none</u>	<u>none</u>	<u>none</u>	
Organics:				
Influent:	<u>1 / year</u>	<u>1 / year</u>	<u>yearly</u>	
Effluent:	<u>1 / year</u>	<u>1 / year</u>	<u>yearly</u>	
Sludge:	<u>none</u>	<u>none</u>	<u>none</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?
none

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? 2

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
- 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>2 / year</u>	<u>2 / year</u>
other SIUs	<u>randomly</u>	<u>NA</u>
Inspection:		
categorical IUs	<u>2 / year</u>	<u>2 / year</u>
other SIUs	<u>randomly</u>	<u>NA</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? yes

3. Are inspections announced or unannounced? Varies depending upon nature of inspection

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: S-M records reviewed in PC office rather than during inspection

Observation of IU self-monitoring procedures: yes

Verification that approved analytical techniques are used: yes
verified at office

Verification of IU flow measurement (where required): NA

6. Overall adequacy of inspection documentation: More information needs to be included in the inspection documentation.
Specific relevant events occur that go undocumented and could be helpful information of importance needed later.
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? NE
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? each IU has a separate three ring binder containing all facility information and is arranged by separate sections
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?
**Point out problems for minor paperwork errors. Issue NOV's
and fines for major permit violations.**

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): NA

19. Additional comments on the POTW's inspection and sampling
procedures: _____

**BMR's aren't updated. This information is gathered from a
facility when first come onto program.**

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: NOV and fines

Late reports: NOV and fines

Unpermitted discharges: NOV and fines

Slug loads or spills: NOV and fines

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)? NA

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:
NA			

5. Comments on the POTW's enforcement procedures:
satisfactory

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **The program has been updated and is awaiting ADEQ approval.**

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? **NA**

3. Does the POTW have copies of permits for IUs in other cities? **NA**

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? **NA**

5. Comments on multijurisdictional issues: **NA**

H. EVALUATION AND COMMENTS

Aero - Incorporated no longer discharges to the city WWTP. The Waste from the vibratory process and plating operation are contained and hauled off site for disposal. Manifests are available for documentation. The City has determined to keep a "No Discharge" permit open in the event they need to discharge to the WWTP.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry:	Aero - Incorporated
POTW Name:	City of Nashville
Industry Contacts:	Dallas Sweeden / Plant Supervisor & Tim McNulty / Plant Manager
Date and Time of Visit:	November 10, 2011 @ 1100
Description of Manufacturing Process:	Production and assembly of scissors and shears using raw iron cut into strips and forged into the shape of scissors. Rough edges removed during vibrating process, rust inhibitor added, plating and sharpening.
Sources of Process Wastewater:	Vibratory process
Categorical Industry?	yes
Basis for Limits:	
Point of Application:	end of process
Description of Pretreatment Equipment and Procedures:	pH adjustment and storage for offsite disposal
Spill Prevention and Solvent Management Procedures:	All floor drains have been sealed
Sampling Location and Equipment:	No sampling at this time due to being no discharge

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Shan Lynch</u>	
NAME OF FACILITY:	<u>City of Nashville</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021776</u>	NPID
DATE OF PCI:	<u>November 10, 2011</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>2</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>2</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