

ADEQ

ARKANSAS
Department of Environmental Quality

June 22, 2012

Mike Roberts, Wastewater Utility Manager
1901 N.E. A Street
Bentonville, Arkansas 72712

AFIN: 04-00154

NPDES Permit No.: AR0022403

Dear Mr. Roberts:

On June 18, 2012, I performed a routine pretreatment compliance evaluation inspection of the Bentonville wastewater 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. It appeared at the time of the inspection that the pretreatment program has been implemented in accordance with the terms of the permit.

If I can be of any assistance, please contact me at 479-267-0811, ext. 16.

Sincerely,



John Fazio
District 1 Inspector
Water Division

cc: Enforcement Branch
Permits Branch



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

NPDES Compliance Inspection Report

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

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <input type="checkbox"/> N <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/> 3 <input type="checkbox"/> A <input type="checkbox"/> R <input type="checkbox"/> 0 <input type="checkbox"/> 0 <input type="checkbox"/> 2 <input type="checkbox"/> 2 <input type="checkbox"/> 4 <input type="checkbox"/> 0 <input type="checkbox"/> 3	11 12 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 0 <input type="checkbox"/> 6 <input type="checkbox"/> 1 <input type="checkbox"/> 8	18 <input type="checkbox"/> P	19 <input type="checkbox"/> S	20 <input type="checkbox"/> 1	
Remarks					
<input type="checkbox"/> A <input type="checkbox"/> F <input type="checkbox"/> I <input type="checkbox"/> N <input type="checkbox"/> 0 <input type="checkbox"/> 4 <input type="checkbox"/> - <input type="checkbox"/> 0 <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 5 <input type="checkbox"/> 4					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 69	70 <input type="checkbox"/> N	71 <input type="checkbox"/> N	72 <input type="checkbox"/> N	73 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	74 75 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 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) City of Bentonville Wastewater Treatment Plant 1901 NE A Street Bentonville, AR 72712	Entry Time /Date 0910 / 06-18-12	Permit Effective Date 03-01-09
	Exit Time/Date 1405 / 06-18-12	Permit Expiration Date 02-28-14
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Nancy Busen, Lab Supervisor and Pretreatment Coordinator, 479-271-3160 / 479-271-3163 Roman Rios, Lab/Pretreatment Coordinator, 479-271-3160	Other Facility Data Outfall OO1: N 36.39234 W -94.20352	
Name, Address of Responsible Official/Title/Phone and Fax Number Mike Roberts, Wastewater Utility Manager, 479-271-3160 / 479-271-3163 City of Bentonville 115 W. Central Bentonville, AR 72712	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
PDS #066379		

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="checkbox"/> N	Permit	<input type="checkbox"/> N	Flow Measurement	<input type="checkbox"/> N	Operations & Maintenance	<input type="checkbox"/> N	Sampling
<input type="checkbox"/> N	Records/Reports	<input type="checkbox"/> N	Self-Monitoring Program	<input type="checkbox"/> N	Sludge Handling/Disposal	<input type="checkbox"/> N	Pollution Prevention
<input type="checkbox"/> N	Facility Site Review	<input type="checkbox"/> N	Compliance Schedules	<input type="checkbox"/> S	Pretreatment	<input type="checkbox"/> N	Multimedia
<input type="checkbox"/> N	Effluent/Receiving Waters	<input type="checkbox"/> N	Laboratory	<input type="checkbox"/> N	Storm Water	<input type="checkbox"/> N	Other:

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

It appeared at the time of the inspection that the pretreatment program has been implemented in accordance with the terms of the permit.

Significant Industrial User Visited:

- 3M ESPE OMNI Preventative Care

Name(s) and Signature(s) of Inspector(s) John Fazio	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/ Fayetteville/479-267-0816/479-267-0819	Date 06/20/12
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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EPA Form 3560-3 (Rev. 9-94) Previous editions are obsolete.

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Bentonville

AFIN Number: 04-00154

NPDES Permit Number(s): AR0022403, ARR00C404, ARR000192

Program Tracked under NPDES Permit Number: AR0022403

Fact Sheet Preparation Date: N/A

Date of Last PCI/Audit: May 21, 2009 / December 1-3, 2009

Date of Last Annual Report: November 16, 2011

Name of Inspector: John A. Fazio

Date PCI Performed: June 18, 2012

Name, Title, and Telephone Number of Facility Representative:
Nancy Busen, Laboratory Supervisor & Pretreatment Coordinator;
Roman Rios, Lab/Pretreatment Technician 479-271-3160

Name and Title of Other Participants: N/A

Number of IUs Visited: 1

Name(s) of IUs Visited: 3M ESPE OMNI Preventative Care

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATES 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. Transmontaigne added, then later deleted.

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? **Includes grease trap disposal method surveys mailed out to various food services (restaurants, schools, childcare facilities, etc.). Plan on mailing additional Hazardous Waste Certification Statements to multiple medical and healthcare facilities, dentists, and pest control businesses to determine if they generate hazardous waste and method of disposal. City Planning sends POTW primary blueprints of new businesses that are potential dischargers of pollutants of concern. Inspections of these facilities are conducted. Roman Rios visits new restaurants and inspects grease interceptors (GI). Mr. Rios educates personnel on proper GI O & M. Electronic yellow pages are used to keep abreast of new businesses. Utility accounts with > 25,000 GPD discharge routed to POTW. Also, participation in various effective programs and committees for alternatives to flushing of pharmaceutical drugs; flyer mail-out w/ utility bills.**

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) 3

6. Number of Categorical Industrial Users: 1

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Facility personnel reviews applicable regulations, visits industrial users and determines what regulations apply.

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:
3M OMNI Preventative Care	SIC 2834, 5122 Pharmaceutical Manufacturing Point Source	Mixing/Compounding and Formulation of Pharmaceutical Product

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, technically-based local limits have been established.

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>1/quarter</u>	<u>1/quarter</u>	<u>0/year</u>	
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>0/year</u>	
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>0/year</u>	
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>0/year</u>	
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>0/year</u>	
Sludge:	<u>N/A</u>	<u>N/A</u>	<u>0/year</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, permit.

2. How many IU permits (or other control documents) have been issued? 3

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>1/year</u>	<u>1/year</u>
other SIUs	<u>1/month to 2/month</u>	<u>1/year</u>
Inspection:		
categorical IUs	<u>At least 1/year</u>	<u>1/year</u>
other SIUs	<u>At least 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? Usually 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: Very good.
Inspections are comprehensive.

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? **POTW's equipment is properly maintained.**

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 BMRs, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? **Data from self-monitoring reports is entered and tracked on spreadsheets. On Flash-Drive. Hard copies are kept of self-monitoring reports, lab report forms, COCs, flow charts and pH charts. Hard copy of BMR on file.**

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?
In accordance with their Enforcement Response Plan.

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: N/A

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: _____

5. Comments on the POTW's enforcement procedures:
The enforcement program has been implemented. NOVs and AO issued in 2011-2012 were issued in accordance with the ERP.
-
-
-
-

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:
City of Centerton
-
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **Yes.**
Centerton required to contact city if they are to discharge abnormal sewage & required to notify city of spills.
-
3. Does the POTW have copies of permits for IUs in other cities? **N/A, not permitted - contract only.**
-
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? **No.**
-
5. Comments on multijurisdictional issues: **None.**
-
-

H. EVALUATION AND COMMENTS

Bentonville POTW:

The pretreatment staff is very knowledgeable of the program and requirements. Ms. Busen and Mr. Rios have a thorough understanding of the SIU facility layouts and each of the SIU's pretreatment processes.

The IU Survey is satisfactory.

No SIUs were found to be in Significant Noncompliance.

3M ESPE OMNI Preventative Care:

The facility appeared to meet the requirements contained in their control document.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: 3M ESPE OMNI Preventative Care

POTW Name: City of Bentonville

Industry Contacts: Luis Maldonado, Quality Supervisor

Date and Time of Visit: June 18, 2012 / 1302

Description of Manufacturing Process:
Mouth rinses and gel treatment for dentistry/prescription are produced and packaged at this facility.

Sources of Process Wastewater:
Rinse from compounding kettles that are used in the product manufacturing process.

Categorical Industry? Yes

Basis for Limits: Local limits

Point of Application: At the sink drain in the compounding room.

Description of Pretreatment Equipment and Procedures:
Adjustment of pH as necessary. Waste batch rinsate pH measured and adjusted before discharge to sink drain in compounding room.

Spill Prevention and Solvent Management Procedures:
Floor drain covers in compounding room where product produced.
Bulk glycerin tank is double-walled and has high-level alarm.
All waste and drums/containers are sent via Clean Harbors hazardous waste haulers to Little Rock for incineration.
Spill containment for liquid-filled drums.

Sampling Location and Equipment:
Sample at sink (point of discharge) in compounding room. SIU contract lab obtains grab samples. Batch discharge volumes are recorded.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>John A. Fazio</u>	
NAME OF FACILITY:	<u>City of Bentonville, Arkansas</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022403</u>	NPID
DATE OF PCI:	<u>June 18, 2012</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>3</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>1</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