

ADEQ

ARKANSAS
Department of Environmental Quality

April 8, 2014

Ms. Kathryn Catlin, Wastewater Systems Manager
City of Harrison Wastewater Treatment Facility
P.O. Box 1715
Harrison, AR 72602

Re: Pretreatment Compliance Inspection (Boone Co)

AFIN: 05-00054

NPDES Permit No. AR0034321

Claridge Products (IU)

Claridge Extrusions (IU)

Pace Industries (IU)

Anchor Die Cast (IU)

Dear Ms. Catlin:

On January 29, 2014, I performed a Pretreatment Compliance Inspection (PCI) of the 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. This inspection did not reveal evidence of any violations.

If I can be of any assistance, please contact me at (870) 446-6170 or by e-mail at Kirkpatrick@adeq.state.ar.us.

Sincerely,



Bruce Kirkpatrick
District 2 Field Inspector
Water Division



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 3 4 3 2 1 11 12 1 4 0 1 2 9 17 18 P 19 S 20 1					
Remarks					
A F I N 0 5 - 0 0 0 5 4					
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) City of Harrison Wastewater Treatment Plant 1508 Silver Valley Road Harrison, Arkansas	Entry Time/Date 0940 / 2014-01-29	Permit Effective Date October 1, 2007
	Exit Time/Date 1422 / 2014-01-29	Permit Expiration Date September 30, 2012 (extended)

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Tim Holt / Pretreatment Coordinator / Phone 870-741-4426	Other Facility Data PDS# 077138
Name, Address of Responsible Official/Title/Phone and Fax Number Ms. Kathryn Catlin / Wastewater Systems Manager / Phone: 870-741-5527 City of Harrison P.O. Box 1715 Harrison, AR 72602	

Contacted
Yes No

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	S	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)

The facility was operating the pretreatment program satisfactorily at the time of the inspection. Facility records were well-organized and maintained. Industrial User inspections were performed at the facilities of the four Significant Industrial Users: Claridge Products, Claridge Extrusions, Pace Industries, and Anchor Die Cast.

Name(s) and Signature(s) of Inspector(s) Bruce Kirkpatrick 	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jasper PHONE# (870) 446-6170 /FAX# (870) 446-2181	Date April 2, 2014
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Signature of Reviewer Kerri McCabe 	Agency/Office/Phone and Fax Numbers ADEQ / NLR / 501-682-0642	Date April 7, 2014
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ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Harrison

AFIN Number: 05-00054

NPDES Permit Number(s): AR0034321

Program Tracked under NPDES Permit Number: AR0034321

Fact Sheet Preparation Date: August 15, 2005

Date of Last PCI/Audit: June 1, 2012

Date of Last Annual Report: January 4, 2014

Name of Inspector: Bruce Kirkpatrick

Date PCI Performed: 1-29-2014

Name, Title, and Telephone Number of Facility Representative:
Mr. Tim Holt, Pretreatment Coordinator, 870-741-4426

Name and Title of Other Participants: n/a

Number of IUs Visited: 4

Name(s) of IUs Visited: Claridge Extrusions, Anchor Die Cast,
Claridge Products, Pace Industries

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. none

2. Has ADEQ or EPA been notified of these changes? n/a
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** yes
4. What procedures are being used to update the IU Survey?
New industries would need to contact Harrison Public Works to obtain water service.

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) 4
6. Number of Categorical Industrial Users: 4
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Annual sampling by POTW along with once/month sampling by facility. Permits developed by NRS Consulting.

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:
Claridge Extrusions	Aluminum Forming	Ext./anod./phosphate
Claridge Products	Porcelain enameling	Porcelain enameling
Anchor Die Cast	Aluminum die casting	Zinc plating
Pace Industries	Metal Finishing	Die casting

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? yes

2. Describe any apparent problems with the local limits.
None observed

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>Annual</u>	<u>same</u>	<u>same</u>	_____
Effluent:	<u>Annual</u>	<u>same</u>	<u>same</u>	_____
Sludge:	<u>Annual</u>	<u>same</u>	<u>same</u>	_____
Organics:				
Influent:	<u>Annual</u>	<u>same</u>	<u>same</u>	_____
Effluent:	<u>Annual</u>	<u>same</u>	<u>same</u>	_____
Sludge:	<u>Annual</u>	<u>same</u>	<u>same</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

n/a

n/a

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? yes
2. How many IU permits (or other control documents) have been issued? 4
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: yes
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: no
Right of entry: yes
Nontransferability: yes
Revocation clause: no
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>quarterly</u>	<u>quarterly</u>
other SIUs	<u>n/a</u>	<u>n/a</u>
Inspection:		
categorical IUs	<u>quarterly</u>	<u>quarterly</u>
other SIUs	<u>n/a</u>	<u>n/a</u>

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

3. Are inspections announced or unannounced? unannounced

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): n/a

6. Overall adequacy of inspection documentation: satisfactory

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? 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?

Tracking done on dry-erase board in Pretreatment Coordinator's office at the POTW along with computer tracking

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?

Letter to IU citing 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: **BMR review not performed as part of this inspection.**

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): n/a

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

The POTW is performing a good job of sampling and inspecting.

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: Phone call followed by a letter.

Late reports: Phone call followed by a letter.

Unpermitted discharges: Phone call followed by a letter.

Slug loads or spills: Phone call followed by a letter.

Follows written enforcement response 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)?

n/a

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:
<u>none</u>			

5. Comments on the POTW's enforcement procedures:

Enforcement procedures are effective.

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:
none
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: none

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Claridge ExtrusionsPOTW Name: City of HarrisonIndustry Contacts: Harry Wagoner, Joe ClouseDate and Time of Visit: 1/29/2014 at 1243 hrsDescription of Manufacturing Process:
Extruding/finishing aluminum products

Sources of Process Wastewater:

Aluminum extrusion, anodizing and phosphatingCategorical Industry? yesBasis for Limits: Harrison Sewer OrdinancePoint of Application: Outfall 001Description of Pretreatment Equipment and Procedures:
pH adjustment / settling / filter press

Spill Prevention and Solvent Management Procedures:

Solvent waste goes RineCo in Benton, Arkansas.Solvent waste is stored in paint house which has no floor drains
with secondary containment.

Sampling Location and Equipment:

Outfall 001 located in manhole on north side of building.Grab samples are obtained.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Anchor Die CastingPOTW Name: HarrisonIndustry Contacts: Cathy SlayDate and Time of Visit: 1/29/2014 at 1304 hrsDescription of Manufacturing Process:
Manufactures chain link fence partsSources of Process Wastewater:
Metal finishing and metal moldingCategorical Industry? yesBasis for Limits: Sewer ordinancePoint of Application: Outfall 001

Description of Pretreatment Equipment and Procedures:

pH adjustment, polymer addition, skimming/clarification, filter press

Spill Prevention and Solvent Management Procedures:

Facility has no floor drains; secondary containment provided.

Sampling Location and Equipment:

Outfall 001 - A grab sample is obtained from the v-notch weir located on the west-side of the pretreatment building.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Pace IndustriesPOTW Name: HarrisonIndustry Contacts: Mark MaddoxDate and Time of Visit: 1/29/2014 at 1114 hrs

Description of Manufacturing Process:

Custom aluminum die casting

Sources of Process Wastewater:

Die washing and cooling; parts vibratorsCategorical Industry? yesBasis for Limits: Sewer ordinancePoint of Application: Outfall 001

Description of Pretreatment Equipment and Procedures:

pH adjustment, polymer addition, filter press

Spill Prevention and Solvent Management Procedures:

Facility has a SPCC Plan and trains staff in its implementation.All floor drains go to pretreatment facility. Spill clean-upkits located throughout plant.

Sampling Location and Equipment:

Outfall 001 - A grab sample is obtained from the discharge from
the pretreatment plant

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Claridge ProductsPOTW Name: HarrisonIndustry Contacts: Harry Wagoner, Darren TuckDate and Time of Visit: 1/29/2014 at 1337 hrsDescription of Manufacturing Process:
Liquid enameling of steel sheetsSources of Process Wastewater:
Porcelain enameling processCategorical Industry? yesBasis for Limits: Sewer ordinancePoint of Application: Outfall 001

Description of Pretreatment Equipment and Procedures:

pH adjustment, polymer addition, filtration

Spill Prevention and Solvent Management Procedures:

Facility has an SPCC plan and trains staff in implementation.
All paint and solvent storage has secondary containment.

Sampling Location and Equipment:

Outfall 001 - A grab sample is obtained from the manhole just
north of the porcelain area.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Bruce Kirkpatrick</u>	
NAME OF FACILITY:	<u>City of Harrison</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0034321</u>	NPID
DATE OF PCI:	<u>1/29/2014</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>4</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>4</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