

ADEQ

ARKANSAS
Department of Environmental Quality

June 11, 2014

Lynn Hyke, Construction and Contract Manager
City of Fayetteville-Paul R. Noland WWTP
113 W. Mountain
Fayetteville, AR 72701

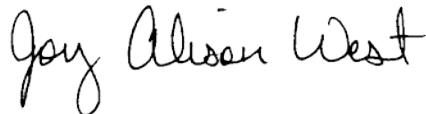
RE: City of Fayetteville-Paul R. Noland WWTP
AFIN: 72-00781 NPDES Permit No.: AR0020010

Dear Mr. Hyke:

On June 5, 2014, Matt Holden, District 1 Field Inspector, 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 there under. This inspection revealed that you are in compliance with the terms of your permit.

If I can be of any assistance, please contact me at 479-267-0811, ext. 12 (west@adeq.state.ar.us).

Sincerely,



Alison West
District 1 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 2 0 0 1 0 11 12 1 4 0 6 0 5 17 18 P 19 S 20 1					
Remarks					
A F I N 7 2 - 0 0 1 0 2					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
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 (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Fayetteville-Paul R. Noland WWTP 1400 N. Fox Hunter Road Fayetteville, AR 72701	Entry Time/Date 0930/06-05-2014	Permit Effective Date 6-1-06
	Exit Time/Date 1540/06-05-2014	Permit Expiration Date 5-31-11
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Denise Georgio/Industrial Pretreatment Coordinator/479-443-3292/479-443-5613	Other Facility Data PDS # 078231	
Name, Address of Responsible Official/Title/Phone and Fax Number Lynn Hyke/Construction and Contract Manager/479-575-8330/479-575-8257 City of Fayetteville 113 W. Mountain Fayetteville, AR 72701	Contacted 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 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)

This inspection revealed that you are in compliance with the terms of your permit.

Name(s) and Signature(s) of Inspector(s) Alison West <i>Jay Alison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811, ext. 12/479-267-0819	Date 06-09-2014
Signature of Reviewer <i>Jason R. Bolenbaugh</i> Jason Bolenbaugh	Agency/Office/Phone and Fax Numbers ADEQ/North Little Rock/501-682-0659	Date 6/11/2014

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

Name of Municipality: City of Fayetteville

AFIN Number: 72-00102

NPDES Permit Number(s): AR0020010, AR0020010C, AR0050288,
ARR00C377

Program Tracked under NPDES Permit Number: AR0020010

Fact Sheet Preparation Date: Unknown

Date of Last PCI/Audit: December 10 and 13, 2011/August 21-23,
2012

Date of Last Annual Report: May 2014

Name of Inspector: Alison West/Matt Holden

Date PCI Performed: June 5, 2014

Name, Title, and Telephone Number of Facility Representative:
Denise Georgio/Industrial Pretreatment Coordinator/479-443-3292

Name and Title of Other Participants: NA

Number of IUs Visited: 2

Name(s) of IUs Visited: Custom Powder Coating, Inc., Elkhart
Productions Corporation

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. Changed Ayshire from significant industrial user to a non-significant industrial user.
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? Review of newspaper/phonebook, permit reapplication requirements, on-site inspections, citizen involvement, industrial user questionnaires, review of water billing records, industrial user questionnaires
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) 7
6. Number of Categorical Industrial Users: 4
7. How does the POTW determine the appropriate categorical standards to apply to an IU? IU information, Federal Register, EPA seminars and guidance manuals, EPA and State pretreatment personnel, SIC codes, and a description of the manufactures processes
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:
Marshalltown Tools	Metal Finishing	Etching
Custom Powder Coating	Metal Finishing	Phosphating
Elkhart Products	Copper Former	Drawing, Annealing, Alkaline Cleaning, Surface Coating, Misc. Waste Streams
Superior Industries	Metal Finishing	Conversion Coating and Etch

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, technically based. A study was conducted and determined to be acceptable. The study was finalized in 2011.

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>Quarterly</u>	<u>2/year</u>	<u>Not req.</u>	
Effluent:	<u>Quarterly</u>	<u>2/year</u>	<u>Not req.</u>	
Sludge:	<u>6/year</u>	<u>Not req.</u>	<u>Not req.</u>	
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>Not req.</u>	
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>Not req.</u>	
Sludge:	<u>None</u>	<u>None</u>	<u>Not req.</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
2. How many IU permits (or other control documents) have been issued? 7
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.
Elkhart, Superior, and Marshalltown permits have been extended. Elkhart-new process, need more data. Superior Industries-changing process. Marshalltown-need to reallocate.
-
4. Does the control document contain the following items?
Files reviewed Marshalltown Tools and Ayrshire Electronics
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>4/year</u>	<u>1/year</u>
Inspection:		
categorical IUs	<u>1/year</u>	<u>1/year</u>
other SIUs	<u>1/year</u>	<u>1/year</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes. Pinnacle Foods, Elkhart, and Custom Powder control documents reviewed.
3. Are inspections announced or unannounced? Typically, 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: N/A
- Verification that approved analytical techniques are used: Yes
- Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Satisfactory
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-
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? N/E
-
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? Pretreatment officer utilizes a tickler file and a file folder system. Also, a computer calendar is used. All reports are reviewed by the pretreatment officer.
-
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?
Follow their formal enforcement response plan. Depending on the violation, by use of an informal notice, NOV, compliance order, cease and desist order, reimbursement of costs, fines judicial action, public notice in newspaper, etc.
18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?: N/A

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: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures: Inspection and sampling procedures appear adequate. All facilities are inspected and sampled at least once per year.
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-
-
-
-
-
-
-
-

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, the facility has an approved formal enforcement plan.

2. How does the POTW respond to the following violations?

Effluent limitations: NOV, Fine, CDO, CO, show cause hearing, judicial action, suspend services, or revoke permit depending on the specifics of violation.

Late reports: Informal notice, NOV, fine-depending on the number of days the report is late, SNC.

Unpermitted discharges: Informal notice, CO, NOV, CDO, Fine depending if harm was caused at the POTW, to POTW personnel, or the public, suspension of service.

Slug loads or spills: NOV, Fine, CDO, suspension of services, CO, or civil action depending if harm was caused or not

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)? There were no significant violators for 2013.

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:
N/A	N/A	N/A	N/A
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:
Enforcement procedures appear adequate. There has not been any IU's in significant violation that required publishing in the newspaper for 2013.
-
-
-

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? Yes, interjurisdictional agreements.
-
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: No SIU's in user cities.
-
-

H. EVALUATION AND COMMENTS

The facility appeared to be operating an effective pretreatment program.

No industries have been in significant non-compliance for the Facility's 2013 reporting year.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Custom Powder Coatings, Inc.

POTW Name: City of Fayetteville

Industry Contacts: Angela Stevens

Date and Time of Visit: 06-05-2014/11:50-12:35

Description of Manufacturing Process:

Iron phosphate cleaning (wash/rinse) prior to powder coating of various parts.

Sources of Process Wastewater:

Rinse water. Treated wash water.

Categorical Industry? Yes, metal finishing

Basis for Limits: Combined Waste Stream formula with 40 CFR 433.

Point of Application: Outfall CPC001.

Description of Pretreatment Equipment and Procedures:

For annual discharge of wash tank, add baking soda to the wash tank until the pH hits 7-8. Usually takes 2 to 3-12 pound bags. A corrugated pipe is installed from the wash tank to drain after the baking soda is added. The sludge in the corrugated pipe is dried, shook out, and put in the trash.

Spill Prevention and Solvent Management Procedures:

Spill prevention is included in the Toxic Organic Management Plan.

Sampling Location and Equipment:

CPC001: Located at the discharge pipe from the iron phosphate cleaning unit into the floor drain in front of the fourth rinse tank.

Sampler: N/A. Manual composite.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Elkhart

POTW Name: City of Fayetteville

Industry Contacts: David Bailey, Environmental Coordinator

Date and Time of Visit: 06-05-2014/12:45-13:58

Description of Manufacturing Process:
Hurricane Parts Washer-Alkaline, Cleaning, Bath and Rinse,
Ranshoff Washer-Alkaline Cleaning, Bath/Quench-Anneal with
Water, Drawing of tubing and wire, soap surface, coating as
lubricant

Sources of Process Wastewater:
Soap coating (piped to batch tank), drawing, clean-up, mop
Water, hurricane parts, furnishing, alkaline cleaning water,
Washer, tube mill groundwater

Categorical Industry? Yes

Basis for Limits: Performance Based Limits for chrome, copper,
and zinc. Oil and grease and lead-
categorical limits. Nickel-allocation.

Point of Application: EPC004

Description of Pretreatment Equipment and Procedures:
Oil skimmers, filtration, chemical precipitation

Spill Prevention and Solvent Management Procedures:
Integrated Contingency Plan with SPCC, Material Inventory, etc.

Sampling Location and Equipment:
EPC004: South end of the building in the waste treatment area.
Point of discharge is in sample tank after the v-notch weir at
the end of the treatment process. Sampler: ISCO2910

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Alison West/Matt Holden</u>	
NAME OF FACILITY:	<u>City of Fayetteville</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0020010</u>	NPID
DATE OF PCI:	<u>June 5, 2014</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>7</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