



A R K A N S A S
Department of Environmental Quality

October 23, 2016

James W. Sanders, Mayor
City of Blytheville
124 West Walnut St.
Blytheville, AR 72315

RE: City of Blytheville Wastewater Inspections
West AFIN: 47-00544 Permit No.: AR0022560 & ARR00C337
South AFIN: 47-00926 Permit No.: AR0022578 & ARR00C338
North AFIN: 47-00929 Permit No.: AR0022586 & ARR000249

Dear Mr. Sanders:


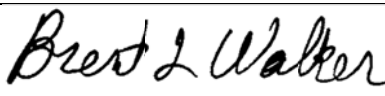

On August 26 and 27, 2015, I performed Pretreatment Compliance (1), Compliance Evaluation (3), Sanitary Sewer Overflow (3) and Industrial Stormwater (3) Inspections of the above referenced facilities in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection reports are enclosed for your records.

Please refer to the “Summary of Findings” section of each attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. This response 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 with all necessary documentation (i.e. photos) is due by **November 9, 2015**.

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

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT					
		AFIN: 47-00544		PERMIT #: AR0022560		DATE: 8/26/2015	
		COUNTY: 47 Mississippi		PDS #: 087289		MEDIA: WN	
		GPS LAT: 35.934850 LONG: -89.942647 LOCATION: Entrance					
FACILITY INFORMATION				INSPECTION INFORMATION			
NAME: Blytheville - West WWTP LOCATION: 4952 NCR 635 CITY: Blytheville				FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 52138 S - State	
				FACILITY EVALUATION RATING: N		INSPECTION TYPE: Pretreatment Compliance	
				DATE(S): 8/26/2015		ENTRY TIME: 09:00	
				DATE(S): 8/27/2015		EXIT TIME: 16:15	
						PERMIT EFFECTIVE DATE: 8/1/2011	
						PERMIT EXPIRATION DATE: 7/31/2016	
RESPONSIBLE OFFICIAL				FAYETTEVILLE SHALE RELATED: N			
NAME / TITLE: James W. Sanders / Mayor COMPANY: City of Blytheville MAILING ADDRESS: 124 West Walnut St. CITY, STATE, ZIP: Blytheville AR 72315 PHONE & EXT. / FAX: 870-763-3602 / EMAIL:				FAYETTEVILLE SHALE VIOLATIONS: N			
				INSPECTION PARTICIPANTS			
				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Thomas Jones/Pretreatment Coordinator Richard DePriest/Wastewater Superintendent			
CONTACTED DURING INSPECTION: No							
AREA EVALUATIONS							
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)							
S	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER		
S	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW		
N	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM		
S	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT		
N	OTHER:						
SUMMARY OF FINDINGS							
<p>No violations were noted regarding the Pretreatment Program.</p> <p>See the attached Pretreatment Report and Individual Industrial User Visits for any specific comments.</p>							
GENERAL COMMENTS							
<p>Water Division Field Services Branch Manager, Jason Bolenbaugh, also participated in this inspection.</p> <p>This inspection was performed in conjunction with CEI, SSO and Stormwater inspections at all three of the City of Blytheville Wastewater Treatments Plants.</p>							
INSPECTOR'S SIGNATURE:  Brent L. Walker						DATE: 10/16/2015	
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh						DATE: 10/23/2015	

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: **Blytheville, AR**

AFIN Number: **47-00544, 47-00926, 47-00929**

NPDES Permit Number(s): **AR0022560, AR0022578, AR0022586**

Program Tracked under NPDES Permit Number: **AR0022560**

Fact Sheet Preparation Date: **Revised as IU permits are renewed**

Date of Last PCI/Audit: **May 21-23, 2013 (Audit)**

Date of Last Annual Report: **August 2014**

Name of Inspector: **Brent Walker & Jason Bolenbaugh**

Date PCI Performed: **8/26/2015 & 8/27/2015**

Name, Title, and Telephone Number of Facility Representative:

Thomas Jones/Pretreatment Coordinator

Richard DePriest/Wastewater Superintendent

Name and Title of Other Participants: **N/A**

Number of IUs Visited: **2**

Name(s) of IUs Visited: **Omnium and Precoat Metals**

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. Precoat Metal added
TSI, Kagome, Advance Industries, Motor Appliance removed
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 Water and Sewer Connections/Drive By
Chamber of Commerce, City Clerk Business Permits
Airport Authority, Code Enforcement
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) 5
6. Number of Categorical Industrial Users: 5
7. How does the POTW determine the appropriate categorical standards to apply to an IU? SIC Code
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:
Regal (Motor Tech)	Meal Finishing	Parts Cleaning
Omnium	Pesticide Formulation	Clean-up
PriMetals	Metal Finishing	Anodizing
Precoat Metal	Metal Finishing	Parts Cleaning
Nibco	Metal Finishing	Parts Cleaning

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes - language in program, but no numerical limits; allows for setting of limits as necessary

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/yr</u>	<u>4/yr</u>	<u>N/A</u>	
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>N/A</u>	
Sludge:	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>No disposal</u>
Organics:				
Influent:	<u>1/yr</u>	<u>1/yr</u>	<u>N/A</u>	
Effluent:	<u>1/yr</u>	<u>1/yr</u>	<u>N/A</u>	
Sludge:	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>No disposal</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?
Yes - ART discharged large amount of bleach to West Plant Meeting with industry representatives - additional info required to be submitted; industry may be permitted if problems continue.

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? 5

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: N/A

IU reporting requirements: N/A

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/yr</u>	<u>N/A</u>
other SIUs	<u>N/A</u>	<u>N/A</u>
Inspection:		
categorical IUs	<u>>1/yr</u>	<u>N/A</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 as required by IU Permit

3. Are inspections announced or unannounced? Both

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: N/A

Observation of IU self-monitoring procedures: N/A

Verification that approved analytical techniques are used: N/A

Verification of IU flow measurement (where required): N/A

6. Overall adequacy of inspection documentation: Adequate

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? **The pretreatment coordinator receives the reports and review for errors and non-compliance. Tracking is Don manually since there is a small number of SIUs.**

15. **ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?** **N/A**

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?
**Notice of Violation followed by surcharges or fines if
required or appropriate.**

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): Yes

19. Additional comments on the POTW's inspection and sampling
procedures: Suggest more detail by included in inspection
reports.

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: According to a written enforcement plan

Late reports: According to a written enforcement plan

Unpermitted discharges: According to written enforcement plan

Slug loads or spills: According to a written enforcement 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>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
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5. Comments on the POTW's enforcement procedures:

None

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:
N/A

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: **N/A**

H. EVALUATION AND COMMENTS

Overall satisfactory Pretreatment Program

Major personnel changes since last inspection. New staff should continue to familiarize themselves with the Pretreatment Program and make improvements to the program as appropriate.

IU SITE VISIT FORM

Name of Industry: **Precoat Metals**

POTW Name: **City of Blytheville**

Industry Contacts: **Will Rogers/EHS**

Date and Time of Visit: **8/27/2015 @ 13:50**

Description of Manufacturing Process:
Steel Painting

Sources of Process Wastewater:
Rinse water

Categorical Industry? **Yes**

Basis for Limits: **40 CFR, City Ordinance & Pretreatment Limits**

Point of Application: **Prior to discharge to city sewer**

Description of Pretreatment Equipment and Procedures:
pH adjustment, polymer, clarifier, 100 micron filter

Spill Prevention and Solvent Management Procedures:
**All drains go to pretreatment system; batch discharge with
Continuous pH monitoring**

Sampling Location and Equipment:
Final holding tank in pretreatment area

IU SITE VISIT FORM

Name of Industry: **Omnium**

POTW Name: **City of Blytheville**

Industry Contacts: **Roger Ray - Lab Technician**

Date and Time of Visit: **8/27/2015 @ 1450**

Description of Manufacturing Process:
Pesticide Formulation

Sources of Process Wastewater:
Lab, equipment cleanup & wash-downs

Categorical Industry? **Yes**

Basis for Limits: **40 CFR, City Ordinance & Pretreatment Limits**

Point of Application: **Prior to discharge to city sewer**

Description of Pretreatment Equipment and Procedures:
Batch tank treatment, sand and carbon filters
Sample tested before discharge

Spill Prevention and Solvent Management Procedures:
No floor drains, curbs around storage areas, no solvents

Sampling Location and Equipment:
Storage tank in lower level of building or manhole by entrance
gate

PRETREATMENT COMPLIANCE INSPECTION

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Brent Walker & Jason Bolenbaugh</u>	
NAME OF FACILITY:	<u>City of Blytheville</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022560</u>	NPID
DATE OF PCI:	<u>8/26-27/2015</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>5</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>5</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