

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 31-00036		PERMIT #: AR0021776		DATE: 5/10/2017
		COUNTY: 31 Howard		PDS #: 097871		MEDIA: WN
		GPS LAT: 33.919881 LONG: -93.861240 LOCATION: *****				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: City of Nashville LOCATION: 743 Hwy 27 South CITY: Nashville			FACILITY TYPE: 1 - Municipal			
			INSPECTOR ID#: 26294 S - State			
			FACILITY EVALUATION RATING: 3 - Satisfactory		INSPECTION TYPE: Pretreatment Compliance	
			DATE(S): 5/10/2017	ENTRY TIME: 11:00	EXIT TIME: 16:45	
					PERMIT EFFECTIVE DATE: 7/1/2014	
					PERMIT EXPIRATION DATE: 6/30/2019	
RESPONSIBLE OFFICIAL						
NAME / TITLE: Larry Dunaway / Public Works Director COMPANY: City of Nashville MAILING ADDRESS: 426 North Main CITY, STATE, ZIP: Nashville AR 71852 PHONE & EXT. / FAX: 870-845-4015 / EMAIL: l.dunaway@nashar.org			FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: Yes			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Larry Dunaway, Public Works Director/870-557-1953 c. Chip Colston, WW Chief Operator/870-200-5044 c. Ed Carlyle, Pretreatment Coordinator/ 870-557-3143 c.			
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
N	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER	
N	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW	
N	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM	
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT	
N	OTHER:					
SUMMARY OF FINDINGS						
No violations noted during inspection.						
GENERAL COMMENTS						
One industrial user was visited, JAN-EZE Plating, Inc.						
INSPECTOR'S SIGNATURE:  Red Smith				DATE: 6/26/2017		
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh				DATE: 7/3/2017		

Inspection Report: **City of Nashville**, AFIN: **31-00036**, Permit #: **AR0021776**
ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Nashville POTW

AFIN Number: 31-00036

NPDES Permit Number(s): AR0021776

Program Tracked under NPDES Permit Number: AR0021776

Fact Sheet Preparation Date: Info. Fact sheet has no date.

Date of Last PCI/Audit: December 4, 2013

Date of Last Annual Report: February 25, 2015

Name of Inspector: Allen Gilliam

Date PCI Performed: 5/10/2017

Name, Title, and Telephone Number of Facility Representative:

Ed Carlyle / Pretreatment Coordinator / 870-845-7402

Name and Title of Other Participants: N/A

Number of IUs Visited: 1

Name(s) of IUs Visited: JAN-EZE Plating, Inc.

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. No change.

2. Has ADEQ or EPA been notified of these changes? N/A

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** YES / every two years

4. What procedures are being used to update the IU Survey?
Potable water hook ups to the city, local news media, city Council meetings, and good careful observation by city Personnel.

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) 1

6. Number of Categorical Industrial Users: 1

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Code of Federal Register and ADEQ.

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 Inc.	Metal finisher	Polishing, plating

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.
Total reduction evaluation(TRE)

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>Quarterly</u>	
Effluent:	<u>4/YR</u>	<u>4/YR</u>	<u>Quarterly</u>	
Sludge:	<u>None</u>	<u>None</u>	<u>None</u>	
Organics:				
Influent:	<u>1/YR</u>	<u>1/YR</u>	<u>1/YR</u>	
Effluent:	<u>1/YR</u>	<u>1/YR</u>	<u>1/YR</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?
No upsets or inhibitions have occurred since the last PCI.

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? One

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 - 1/yr

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

No transferability: 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>2/year</u>
other SIUs	<u>randomly</u>	<u>NA</u>
Inspection:		
categorical IUs	<u>N/A</u>	<u>N/A</u>
other SIUs	<u>1/Year</u>	<u>2/Year</u>

REQUIRED BY THE APPROVED PROGRAM? YES

3. Are inspections announced or unannounced? 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: _____

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: YES

Inspection of the pretreatment facilities: No

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

Verification of IU flow measurement (where required): Yes

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.

Reviewed and filed accordingly to section

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 the 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): N/A

19. Additional comments on the POTW's inspection and sampling
procedures: Procedures seem to be adequate at this time.

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, visit, and then NOV.

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:
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
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5. Comments on the POTW's enforcement procedures:

Satisfactory at this time.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes-New**
Program is developed and approved.

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: **N/A**

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Red Smith</u>	
NAME OF FACILITY:	<u>JAN-EZE Plating Corporation</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021776</u>	NPID
DATE OF PCI:	<u>5/10/2017</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>0</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>031-00036</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