

ADEQ

ARKANSAS
Department of Environmental Quality

August 9, 2017

Nancy Busen, Pretreatment Supervisor
City of Bentonville
1901 N.E. "A" Street
Bentonville, AR 72712

RE: City of Bentonville Pretreatment Compliance Inspection
AFIN: 04-00154 Permit No.: AR0022403

Dear Ms. Busen:

On August 1, 2017, I performed a Pretreatment Compliance Inspection of the above referenced 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. A copy of the inspection report is enclosed for your records.


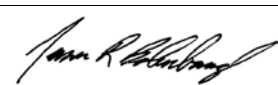
No violations were noted at the time of the inspection. Please refer to the attached inspection report for any comments. If I can be of any assistance, please contact me at Bolenbaugh@adeq.state.ar.us or 501-682-0659.

Sincerely,



Jason Bolenbaugh
Compliance Branch Manager
Office of Water Quality

CC: Adam Yates, ADEQ Permit Engineer, yates@adeq.state.ar.us
Lindsay Johnson, ADEQ Permit Engineer, ljohnson@adeq.state.ar.us

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 04-00154		PERMIT #: AR0022403		DATE: 8/1/2017
		COUNTY: 04 Benton			PDS #: 098500	MEDIA: WN
		GPS LAT:	LONG:	LOCATION: *****		
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: City of Bentonville LOCATION: 1901 N.E. "A" Street CITY: Bentonville			FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 83321 S - State FACILITY EVALUATION RATING: 4 - Satisfactory INSPECTION TYPE: Pretreatment Compliance			
RESPONSIBLE OFFICIAL			DATE(S): 8/1/2017 ENTRY TIME: 09:00 EXIT TIME: 14:35 PERMIT EFFECTIVE DATE: 7/1/2015 PERMIT EXPIRATION DATE: 6/30/2020			
NAME / TITLE: Nancy Busen / Pretreatment Supervisor COMPANY: City of Bentonville MAILING ADDRESS: 1901 N.E. "A" Street CITY, STATE, ZIP: Bentonville AR 72712 PHONE & EXT. / FAX: 479-271-3160 / EMAIL: NBusen@bentonvillear.com			FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: Yes			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Garrett Grimes, ADEQ Inspector Roman Rios, City of Bentonville Tim McGee, City of Bentonville			
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
S	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER	
S	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW	
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM	
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT	
**	OTHER:					
SUMMARY OF FINDINGS						
No violations noted at the time of the inspection.						
GENERAL COMMENTS						
ADEQ appreciates the cooperation from the entire staff and the ability to use the treatment plant's training room for document review. A comment has been made on the Industrial User regarding the user's inability to explain testing information that is outlined in the operations and maintenance manual of the pretreatment system.						
INSPECTOR'S SIGNATURE: <small>←Click text to left to add signature</small>				-Inspector Name		
SUPERVISOR'S SIGNATURE: 				DATE: 8/8/2017		
				DATE: 8/8/2017		

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**

Program Tracked under NPDES Permit Number: **AR0022403**

Fact Sheet Preparation Date: **7-28-2017**

Date of Last PCI/Audit: **Inspection 6-28-2012/Audit 8-20-2013**

Date of Last Annual Report: **12-15-2016**

Name of Inspector: **Jason Bolenbaugh**

Date PCI Performed: **8-1-2017**

Name, Title, and Telephone Number of Facility Representative:
Roman Rios, Laboratory/Pretreatment Supervisor
Tim McGee

Name and Title of Other Participants: _____
Garrett Grimes, ADEQ District Field Inspector (Fayetteville)

Number of IUs Visited: **1**

Name(s) of IUs Visited: **Wal-Mart TMG**

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

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.
No problems but have noticed an occasional spike in Mercury

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>Annually</u>		
Effluent:	<u>Quarterly</u>	<u>Annually</u>		
Sludge:	<u>Quarterly</u>	<u>Annually</u>		
Organics:				
Influent:	<u>Quarterly</u>	<u>Annually</u>		
Effluent:	<u>Quarterly</u>	<u>Annually</u>		
Sludge:	<u>Quarterly</u>	<u>Annually</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?
None

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Permit

2. How many IU permits (or other control documents) have been issued? 1

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, a permit is issued to the facility

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 - Outfall 001

Type of sample: Yes - Grab and Composite

Monitoring frequency: Yes - Monthly

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>Currently None</u>	<u>Annually</u>
other SIUs	<u>2-6/year</u>	<u>Annually</u>
Inspection:		
categorical IUs	<u>Annually</u>	<u>Annually</u>
other SIUs	<u>Annually</u>	<u>Annually</u>

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

3. Are inspections announced or unannounced? Last was 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: 9-28-2016 @ 10:00 A.M.

Officials present: Roman Rios & Ben Loy

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: Good

17. What are the POTW's procedures for following up violations?
Central Authority will write letters, issue enforcement
actions, and address the violations in person with the
facility.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR
403.12(b)?: _____

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: No BMR reviewed due to lack of
categorical IU.

Other environmental permits held: _____

Description of operations: _____

Process flow diagrams: _____

Flow measurements: _____

Measurements of regulated pollutants: _____

Certification of compliance by the IU: _____

Compliance schedule (if needed): _____

19. Additional comments on the POTW's inspection and sampling
procedures: Facility is monitoring discharge to POTW on a
monthly basis. Sampling analysis and Chain-of-Custody were
In accordance with protocols.

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes. POTW will send a NOV for an initial violation and will request corrective actions and a response. No cases have required additional enforcement.

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

Effluent limitations: NOV, AO

Late reports: Contact Facility, NOV, AO

Unpermitted discharges: NOV, AO

Slug loads or spills: NOV, AO

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)? The POTW can publish if necessary.

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:
None	None	None	None
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:

NOV is an official communication from the CA to the IU which
Informs the user that a pretreatment violation has occurred.
AO is issued when an NOV is not effective in bringing the IU
Into compliance in a timely manner. Types of AOs are: Consent
Order, Show Cause Order, Compliance Order, and Cease and
Desist Order. Civil or Criminal Action may also occur.

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, Nancy Busen, Roman Rios, and Tim McGee

3. Are the responsible officials familiar with the approved program? Yes, very knowledgeable and experienced

G. MULTI JURISDICTIONAL 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

H. EVALUATION AND COMMENTS

Wal-Mart TMG: Monitoring and Reporting Requirements

Twenty-four (24) hour flow proportional composites are collected for Total Copper, Total Zinc, and Total Phosphorus. A minimum of four (4) Oil & Grease samples must be collected at approximately equal intervals during the 24-hour sampling process. All samples are collected at least once/month. Monitoring results are summarized and reported on an Industrial User (IU) Monitoring Report submitted by the 8th day of the following month. If sampling indicates a violation, the permittee shall notify the POTW within 24-hours of becoming aware of the violation, and sampling will need to be conducted again within thirty (30) days.

The CA also operates a grease program for all applicable local businesses that monitor the businesses and the services that pump the grease from the businesses. The program ensures grease traps are pumped on a regular basis and properly disposed of by licensed professionals.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Wal-Mart TMG (Distribution Center)**

POTW Name: **City of Bentonville**

Industry Contacts: **Charles Bishop**

Date and Time of Visit: **8-1-2017**

Description of Manufacturing Process:

Daily maintenance of Over-The-Road (OTR) trucks, including engine repairs, trailer repairs, tire and wheel replacements, tractor fueling, and truck washing facilities.

Sources of Process Wastewater:

Wastewater from truck wash and floor drains in the maintenance shop and fueling station.

Categorical Industry? **No**

Basis for Limits: **Local Limits**

Point of Application:

Description of Pretreatment Equipment and Procedures:

Sand-Oil Separator

Spill Prevention and Solvent Management Procedures:

Chemical storage containers are located in the chemical bay of TMG, 2 containers are double walled round containers that hold 800 gallons each. There is 1 tote that holds 300 gallons. Floor drains are plugged. SPCC Plan has been developed.

Sampling Location and Equipment:

Outfall 001; discharged through the Palmer-Bowlus flume inserted into the 6-inch line on the north side of the truck maintenance garage.

