



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

## WATER DIVISION INSPECTION REPORT

AFIN: <b>36-00038</b>	PERMIT #: <b>AR0022187</b>	DATE: <b>5/21/2020</b>
COUNTY: <b>36 Johnson</b>	PDS #: <b>112177</b>	MEDIA: <b>WN</b>
GPS LAT: <b>35.463135</b> LONG: <b>-93.422850</b> LOCATION: <b>General Area</b>		

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: <b>GreenvilleTube - Rathgibson, LLC</b> LOCATION: <b>501 South Montgomery</b> CITY: <b>Clarksville, AR 72830</b>	FACILITY TYPE: <b>2 - Industrial</b> INSPECTOR ID#: <b>34689 S - State</b> FACILITY EVALUATION RATING: <b>N</b> INSPECTION TYPE: <b>Industrial User</b> DATE(S): <b>5/21/2020</b> ENTRY TIME: <b>11:10</b> EXIT TIME: <b>11:50</b> PERMIT EFFECTIVE DATE: <b>7/1/2019</b> PERMIT EXPIRATION DATE: <b>6/30/2024</b>
RESPONSIBLE OFFICIAL	FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b> <b>INSPECTION PARTICIPANTS</b> NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Jim Roberts/ Plant Engineer/479-754-6500</b> <b>John Kidd/ EH&amp;S Manager/479-754-6500</b> <b>Pam Smith/ Clarksville Pretreatment Coordinator/</b> <b>479-754-6241/ Pam.Smith@clarksvilleconnected.net</b>
NAME / TITLE: <b>Mr. Dave Calhoun / General Manager</b> COMPANY: <b>Rathgibson LLC- Greenville Tube</b> MAILING ADDRESS: <b>PO Box 550</b> CITY, STATE, ZIP: <b>Clarksville AR 72830</b> PHONE & EXT. / FAX: <b>479-754-6500 /</b> EMAIL: <b>davecalhoun@rathgibson.com</b> <b>jimroberts@rathgibson.com</b> <b>Pam.Smith@clarkvillecon</b>	
CONTACTED DURING INSPECTION: <b>No</b>	

AREA EVALUATIONS					
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
<b>N</b>	PERMIT	<b>N</b>	FLOW MEASUREMENT	<b>N</b>	STORMWATER
<b>N</b>	RECORDS/REPORTS	<b>N</b>	LABORATORY	<b>N</b>	FACILITY SITE REVIEW
<b>N</b>	OPERATION & MAINTENANCE	<b>N</b>	EFFLUENT/RECEIVING WATER	<b>N</b>	SELF-MONITORING PROGRAM
<b>N</b>	SAMPLING	<b>N</b>	SLUDGE HANDLING/DISPOSAL	<b>N</b>	PRETREATMENT
<b>S</b>	OTHER: <b>Pretreatment IU</b>				

**SUMMARY OF FINDINGS**

**Pretreatment system appears properly maintained and operated.**

**GENERAL COMMENTS**

**Introduction**

I conducted an IU site visit at Greenville Tube (AFIN 36-00015) on May 21, 2020. Mr. Jim Roberts, Plant Engineer, and Mr. John Kidd, EH&S Manager, represented the facility during the inspection. Ms. Pam Smith, Clarksville Pretreatment Coordinator attended. This inspection consisted of an inspection of the pretreatment system, sampling, operating procedures, and spill prevention. Greenville Tube is a stainless steel and nickel tubing reducer with custom orders. This facility is a Categorical IU. Greenville Tube is currently covered under OWQ permits ARR00A004 and ARG250001, OAQ permit 0161-AR-3, and Hazardous OLR-Waste permits ARD065310583 and ARR000014027. The POTW is covered under NPDES permit AR0022187.

**Site Visit**

The pretreatment system consists of an acid wash with soda ash added for pH neutralization. The tank is equipped with a vacuum and filter. Samples are collected at south end of rinse tank prior to discharge to the POTW. The pH is monitored continuously; system is equipped with an alarm, prior to discharge. Spill kits are available onsite. I found no maintenance or operational issues concerning the pretreatment system.

INSPECTOR'S SIGNATURE: <i>Travis Harmon</i>	Travis Harmon	DATE: 6/5/2020
SUPERVISOR'S SIGNATURE: <i>Kerri McCabe</i>	Kerri McCabe	DATE: 6/10/2020

**Industrial Site Visit**

Name of Industry: Rathgibson, LLC - Greenville Tube

Industry Contacts: Jim Roberts, Plant Engineer; John Kidd, EH&S Manager

Type of Industry: Steel tubing reducer

Date of Visit: May 21, 2020

- |     |   |   |  |   |
|-----|---|---|--|---|
| 1.  | Significant industrial user:                          | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A            |
| 2.  | Pretreatment equipment or procedures?                 | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A            |
| 3.  | Pretreatment equipment maintained<br>and operational? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A            |
| 4.  | Hazardous waste generated or stored?                  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A            |
| 5.  | Proper solid waste disposal?                          | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            | <input checked="" type="checkbox"/> N/A |
| 6.  | Solvent management/TTO control?                       | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            | <input checked="" type="checkbox"/> N/A |
| 7.  | Suitable sampling location?                           | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A            |
| 8.  | Appropriate self-monitoring<br>procedures/equipment?  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A            |
| 9.  | Adequate spill prevention?                            | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A            |
| 10. | Industry familiar with limits<br>and requirements?    | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A            |

Additional Comments:

Visit Conducted By: Travis Harmon

Date of Report: June 5, 2020

**Water Division Photographic Evidence Sheet**

Location:	<b>GreenvilleTube - Rathgibson, LLC</b>			
Photographer:	<b>Travis Harmon</b>	Date:	<b>5/21/2020</b>	
Witness:	<b>Pam Smith, Clarksville Pretreatment Coordinator</b>		Time:	<b>1121</b>
Description:	<b>pH adjustment for neutralization.</b>		Photo #:	<b>1</b>



Photographer:	<b>Travis Harmon</b>	Date:	<b>5/21/2020</b>	
Witness:	<b>Pam Smith, Clarksville Pretreatment Coordinator</b>		Time:	<b>1122</b>
Description:	<b>Vacuum and filter and tank.</b>		Photo #:	<b>2</b>



**Water Division Photographic Evidence Sheet**

Location:	<b>GreenvilleTube - Rathgibson, LLC</b>			
Photographer:	<b>Travis Harmon</b>	Date:	<b>5/21/2020</b>	
Witness:	<b>Pam Smith, Clarksville Pretreatment Coordinator</b>	Time:	<b>1123</b>	
Description:	<b>pH is continuously monitored with alarm system.</b>		Photo #:	<b>3</b>



Photographer:	<b>Travis Harmon</b>	Date:	<b>5/21/2020</b>	
Witness:	<b>Pam Smith, Clarksville Pretreatment Coordinator</b>	Time:	<b>1125</b>	
Description:	<b>Sample collection point.</b>		Photo #:	<b>4</b>



**Figure 1. Google Earth image of facility.**

