



ARKANSAS

ENERGY & ENVIRONMENT

December 8, 2021

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

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

Dear Ms. Busen:

On July 27, 2021, 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 inspection report for any comments.

If I can be of any assistance please contact me at cole.southerland@adeq.state.ar.us or (501) 837-2093.

Sincerely,

A handwritten signature in cursive script that reads "Cole Southerland".

Cole Southerland
Inspector, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

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|---|--------------------------------|--|--------------------------|------------------------|-------------------------|
|  ENVIRONMENTAL QUALITY | OFFICE OF WATER QUALITY | | | | |
| | INSPECTION REPORT | | | | |
| | AFIN: 04-00154 | PERMIT #: AR0022403 | DATE: 7/27/2021 | | |
| | COUNTY: 04 Benton | PDS #: 118407 | MEDIA: WN | | |
| GPS LAT: | LONG: | LOCATION: N/A | | | |
| FACILITY INFORMATION | | INSPECTION INFORMATION | | | |
| NAME: City of Bentonville LOCATION: 1901 N.E. "A" Street CITY: Bentonville | | FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 127361 S - State FACILITY EVALUATION RATING: N INSPECTION TYPE: Pretreatment Compliance | | | |
| RESPONSIBLE OFFICIAL | | DATE(S): 7/27/2021 ENTRY TIME: 09:00 EXIT TIME: 14:30 PERMIT EFFECTIVE DATE: 2/1/2021 PERMIT EXPIRATION DATE: 1/31/2026 | | | |
| 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: No | | INSPECTION PARTICIPANTS | | | |
| NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Cole Southerland/ Inspector/ DEQ Garrett Grimes/ Inspector/ DEQ Tim McGee/ Pretreatment Coordinator/ Bentonville | | | | | |
| AREA EVALUATIONS | | | | | |
| (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated) | | | | | |
| S | PERMIT | N | FLOW MEASUREMENT | N | STORMWATER |
| S | RECORDS/REPORTS | S | LABORATORY | N | FACILITY SITE REVIEW |
| S | OPERATION & MAINTENANCE | N | EFFLUENT/RECEIVING WATER | N | SELF-MONITORING PROGRAM |
| S | SAMPLING | N | SLUDGE HANDLING/DISPOSAL | S | PRETREATMENT |
| N | OTHER: | | | | |
| SUMMARY OF FINDINGS | | | | | |
| No violations were observed during the inspection. | | | | | |
| GENERAL COMMENTS | | | | | |
| DEQ appreciates the cooperation from the entire staff and the ability to use the Municipal Building's conference room for document reviewing. Comments have been added within the Industrial User form regarding the sampling location at Walmart TMG with the addition of a second sand/oil separator. | | | | | |
| INSPECTOR'S SIGNATURE: <i>Cole Southerland</i> Cole Southerland | | | | DATE: 8/24/2021 | |
| SUPERVISOR'S SIGNATURE: <i>Brent L Walker</i> Brent L. Walker | | | | DATE: 12/7/2021 | |

**DIVISION OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT**

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| 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: 7/26/2021 |
| Date of Last PCI/Audit: 8/1/2017 |
| Date of Last Annual Report: 12/7/2020 |
| Name of Inspector: Garrett Grimes, Cole Southerland |
| Date PCI Performed: 7/27/2021 |
| Name and Title of Facility Representative: Tim McGee/Pretreatment Coordinator |
| Name and Title of Other Participants: N/A |
| 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. |

| 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. Small spikes in mercury and arsenic during spring. | | | | | |
| 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: | Sampling Frequency | Permit Requirement | Program Requirement | | |
| Metals: | | | | | |
| Influent: | Quarterly | Quarterly | | | |
| Effluent: | Quarterly | Quarterly | | | |
| Sludge: | Quarterly | Annually | | | |
| Organics: | | | | | |
| Influent: | Annually | Annually | | | |
| Effluent: | Annually | Annually | | | |
| Sludge: | Annually | Annually | | | |
| Comments: Sludge tested under Class A requirements compared to report. TCLP done annually for sludge. | | | | | |
| Started sampling line to NACA in 2020. General metals (Pollutant of concern list), CBOD, Ammonia, TPhos, Cyanide, | | | | | |
| 4. Have there been any inhibitions or upsets at the POTW (since the last PCI 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 |
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| 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? List the section of the permit each item is listed under. |
| An expiration date: Yes, Cover page |
| Discharge limitations: Yes, Part 1.B |
| If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under. |
| IU self-monitoring requirements: Yes, Part 2 - Monitoring and Reporting Requirements |
| IU reporting requirements: Yes, Part 2 - Monitoring and Reporting Requirements |
| 5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under. |
| Sample location: Yes, Outfall 001 |
| Type of sample: Yes, Grab and composite - Grabs are combined at lab |
| Monitoring frequency: Yes, Monthly |
| Bypass prohibition: Yes |
| Right of entry: Yes |
| Non-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 Requirements: |
| Sampling: | | | |
| Categorical IUs | N/A | | N/A |
| Other SIUs | Annual | | Annual |
| Non-SIUs | | | |
| Inspection: | | | |
| Categorical IUs | N/A | | N/A |
| Other SIUs | Annual | | Annual |
| Non-SIUs | | | |
| Comments: Hospital, CTI, Bentonville Brewing, and Bike Rack Brewing are sampled once per year during an informal site visit. | | | |
| 2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? | | | |
| Yes | | | |
| 3. Are inspections announced or unannounced? Announced inspections, but will occasionally conduct unannounced (informal site visit - check for sampling). | | | |
| 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: Non-categorical, Discharge to POTW (NACA) | | | |
| Inspection of the pretreatment facilities: Yes, walkthrough | | | |
| 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. Please describe the 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 | | | |

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| 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? Past flume. Not on records. |
| 13. Are sampling services available in an emergency? Have capability. Water and Sewer on-call for after hours and emergency calls. |
| 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? Monthly sampling reports due on 8th of the month. Sent in an email/fax for review. Slug load notification - notified by phone either work or after-hours. Bypassing - Same as slug load notification. |
| 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? No violations noted. Verbal notification and resample general procedure. |
| 17. What are the POTW's procedures for following up violations? Contact facility by phone, resample. Go from verbal to NOV and AO if still Above limits. |

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| 18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? NA |
| 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: NA |
| 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): |
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| 19. Additional comments on the POTW's inspection and sampling procedures: |
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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 | | | | |
| 2. How does the POTW respond to the following violations? | | | | |
| Effluent limitations: Verbal with immediate resample, Formal NOV if still exceeds. Can go to AO, cease and desist if not resolved. | | | | |
| Late reports: Email sent requesting the late report (5-days allowed). Work with IU if need be to get report. Not within 30-days and intentional go to formal NOV. | | | | |
| Unpermitted discharges: Contact industry, sampling event, cease and desist order if detect. NOV and AO move to permit. | | | | |
| Slug loads or spills: Depends on business type, Cease and desist, Waste character, sample. | | | | |
| 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)? | | | | |
| Publish annually with primary local paper, Arkansas Democrat Gazette. Has not had any Sig Violators. | | | | |
| 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 | | | | |
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| 5. Comments on the POTW's enforcement procedures: | | | | |
| None | | | | |

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| F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE |
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| 1. Is the program structure essentially the same as that presented in the approved pretreatment program? |
| At the time of the inspection: Bentonville Water Utilities is over pretreatment program. Mike Bender, Director; Preston Newbel, Deputy Director; Beau Thompson, Manager of Technical Services; Joey Ingle, Technical Supervisor, Tim McGee, Pretreatment Coordinator. |
| Nancy Busen, Responsible Official for Pretreatment Program Tim McGee, Oversees program Wastewater Lab helps when needed. |
| 2. Are staffing levels adequate? Yes |
| 3. Are the responsible officials familiar with the approved program? Yes |
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| G. MULTIJURISDICTIONAL ISSUES |
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| 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: None |
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| H. EVALUATION AND COMMENTS |
| Overall satisfactory pretreatment program. |

**_ PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM**

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| Name of Industry: Walmart TMG (Distribution Center) |
| POTW Name: City of Bentonville |
| Industry Contacts: Charles Bishop/Service Manager |
| Date and Time of Visit: 7/27/2021 13:20-14:30 |
| Description of Manufacturing Process: Maintenance of distribution vehicles. Maintenance includes engine repair, tire and wheel repair, trailer repair. Other processes are truck fueling and truck washing bay. |
| Sources of Process Wastewater: Floor drains within maintenance shop, fueling station, and truck washing bay. |
| 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 area has proper precautions in place. Floor drains are plugged in chemical bay. Spill Prevention Kits are located in various areas around the facility. |
| Sampling Location and Equipment: Outfall 001; sample taken just after 6" Palmer-Bowlus flume on the North side of the maintenance shop. |

**PPETS CODE SHEET
PRETREATMENT COMPLIANCE INSPECTION (PCI)**

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|---|------|
| | CODE |
| INSPECTOR'S NAME: <u>Garrett Grimes, Cole Southerland</u> | |
| NAME OF FACILITY: <u>City of Bentonville</u> | |
| PERMIT NUMBER USED TO TRACK PROGRAM: <u>AR0022403</u> | NPID |
| DATE OF PCI: <u>7/27/2021</u> | DTIA |

PPETS WENDB DATA ELEMENTS

| | | |
|--|----------|------|
| NUMBER OF SIGNIFICANT IUS (SIUS): | <u>1</u> | SIUS |
| NUMBER OF CATEGORICAL IUS: | <u>0</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 |