



# ARKANSAS

## ENERGY & ENVIRONMENT

December 13, 2022

Mike Shepard  
Elkhart Products Corp.  
3265 Hwy 71 S.  
Fayetteville, AR 72701

RE: Elkhart Products Corp Inspection  
Industrial User of Fayetteville AFIN: 72-00781 Permit No.: AR0020010

Dear Mr. Shepard:

On September 29, 2022, I performed an Industrial User Visit of the above referenced facility as part of the City of Fayetteville's Pretreatment Compliance Inspection 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.


Please refer to the inspection report for any comments.

If I can be of any assistance, please contact me at [garrett.grimes@adeq.state.ar.us](mailto:garrett.grimes@adeq.state.ar.us) or 501-837-2067.

Sincerely,



A handwritten signature in blue ink that reads "Garrett Grimes".

Garrett Grimes  
Inspector, Office of Water Quality  
5301 Northshore Drive, North Little Rock, AR, 72118

 <p><b>ENVIRONMENTAL QUALITY</b></p>	<b>OFFICE OF WATER QUALITY INSPECTION REPORT</b>				
	AFIN: <b>72-00781</b>	PERMIT #: <b>AR0020010</b>	DATE: <b>9/29/2022</b>		
	COUNTY: <b>72 Washington</b>	PDS #: <b>123780</b>	MEDIA: <b>WN</b>		
	GPS LAT: <b>36.025513</b> LONG: <b>-94.173423</b> LOCATION: <b>General Area</b>				
<b>FACILITY INFORMATION</b>		<b>INSPECTION INFORMATION</b>			
NAME: <b>Elkhart Products Corp</b> LOCATION: <b>3625 Highway 71 South</b> CITY: <b>Fayetteville</b>		FACILITY TYPE: <b>2 - Industrial</b> INSPECTOR ID#: <b>104111 S - State</b> FACILITY EVALUATION RATING: <b>N</b> INSPECTION TYPE: <b>Industrial User</b>			
<b>RESPONSIBLE OFFICIAL</b>		DATE(S): <b>9/29/2022</b> ENTRY TIME: <b>11:25</b> EXIT TIME: <b>13:00</b> PERMIT EFFECTIVE DATE: <b>1/1/2018</b> PERMIT EXPIRATION DATE: <b>12/31/2022</b>			
NAME: / TITLE <b>Mike Shepard /</b> COMPANY: <b>Elkhart Products Corp.</b> MAILING ADDRESS: <b>3265 Hwy 71 S.</b> CITY, STATE, ZIP: <b>Fayetteville AR 72701</b> PHONE & EXT: / FAX: <b>479-443-2368 /</b> EMAIL:		FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b> <b>INSPECTION PARTICIPANTS</b> NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>John Byrd, Pretreatment Coordinator, Jacobs Engineering Group;</b> <b>Carl Pizzino, EH&amp;S Manager, Elkhart Products Corporation;</b> <b>Will Cody, Inspector, DEQ;</b> <b>Garrett Grimes, Inspector, DEQ</b>			
CONTACTED DURING INSPECTION: <b>Yes</b>					
<b>AREA EVALUATIONS</b> (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>N</b>	OTHER:				
<b>SUMMARY OF FINDINGS</b>					
<p><b>This facility was inspected as part of routine visits to Significant Industrial Users (SIUs) during the City Fayetteville's Pretreatment Compliance Inspection conducted on September 29, 2022. Please review the "General Comments" section below for comments and potential violations of the City's control documentation.</b></p>					

**GENERAL COMMENTS**

- a. The facility does not maintain adequate Quality Assurance/Quality Control for measurements of pH and flow. Calibration records of pH are not recorded. The flow meter was in need of calibration at the time of the inspection and the facility did not have a staff gauge for manual measurements of flow and were unfamiliar with methods to perform calibration checks of their meter.
- b. The facility utilizes a contract lab for analyses of copper and chromium in their effluent and reports these values on their Discharge Monitoring Reports submitted to the City. However, Elkhart Product Corporation also conducts routine checks of their effluent at the weir for copper and chromium using a Hach handheld meter and does not report these values. If this method follows standard methods outlined in 40 CFR 136, then these values would need to be reported on the DMR following the additional monitoring reporting requirements in the control document. Furthermore, if the facility identifies possible non-compliance in their effluent, Elkhart Products must follow any reporting requirements in their control document including notifying the City and conducting follow-up sampling.
- c. Elkhart Products maintains a small room for electroplating. According to Mr. Pizzino, This process does not generate significant amounts of hazardous waste. The design of the room prevents spills from easily escaping. However, plating solution was observed on the ground even though the room was unoccupied during the inspection. Furthermore, a bucket with plating solution was observed on the ground without a lid in a location where a spill could result. All spills should be remediated upon occurrence. Containers of plating solution should be closed and secured when not in use.

INSPECTOR'S SIGNATURE: 	Garrett Grimes	DATE: 10/05/2022
SUPERVISOR'S SIGNATURE: 	Brent L. Walker	DATE: 12/8/2022

**Industrial Site Visit**

**Name of Industry: Elkhart Products Corporation**

**Industry Contacts: Carl Pizzino**

**Type of Industry: Metal forming**

**Date of Visit:**

- |     |  |   |  |                              |
|-----|--|---|--|------------------------------|
| 1.  | Significant industrial user:                       | <input checked="" type="checkbox"/> Yes | <input 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 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 checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A |
| 6.  | Solvent management/TTO control?                    | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input 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 procedures/equipment?  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 9.  | Adequate spill prevention?                         | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 10. | Industry familiar with limits and requirements?    | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A |

**Additional Comments: None**