



## NASHVILLE PUBLIC WORKS

426 North Main, Nashville, AR 71852  
PH (870) 845- 4015, FAX (870) 845-7409

September 30, 2009

ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Attn: Allen Gilliam  
State Pretreatment Coordinator

Re: Response to Pretreatment Audit, June, 2009.

Dear Allen:

We appreciate all the help that you personally provide during our Pretreatment Audit for the City of Nashville. Our Pretreatment Coordinator, Ed Carlyle, has provided a few response's to the audit with more responses needing further time.

As always, if you have any questions of concern you may contact us at 870-845-4015.

Sincerely,

A handwritten signature in cursive script that reads 'Larry Dunaway'.

Larry Dunaway  
Public Works Director

enclosure's (2)

cc: Ed Carlyle, Pretreatment Coordinator  
Pretreatment File - 2009

1. **FINDING:** During the file review it was discovered comprehensive inspections were not being documented. The inspections lacked detailed information on the IUs' processes, pretreatment, chemical handling and storage procedures, chemical spill prevention areas, hazardous waste storage handling procedures, sampling procedures and the IUs' monitoring records (See "Audit Checklist's IU File Review, Section 9.a. through 9.q." and Attch. A-3 for comparison).

If the inspection Checklist items were to have been addressed and documented, the City's inspections would have been deemed adequate. It was suggested to complete such a comprehensive inspection and use a copy of it during subsequent inspections to use as a work copy and to update any changes made at the IU. One of the first questions that should be asked at the beginning of an inspection should be, "Has there been any process, raw material or chemistry changes made since the last inspection?"

**RESPONSE:** Because I have not used an Industrial Checklist at a previous inspection, I cannot respond to this required action until I have done so. My next inspections will involve a checklist and an up-dated version of my inspection form to make sure I have covered all detailed information needed. I will send Allen Gilliam a copy of the new inspection form.

2. **FINDING:** During the Jan-Eze review a monthly average Zinc violation was noted. The IU notified the City of the violation and repeated a sampling/analysis per 40 CFR 403.12 (F) (2) (see Attach. A-6P). No documentation of initial or follow-up enforcement could be produced. If a phone call was made discussing the violation, the record of communication must be documented and placed in the IU's file.

**RESPONSE:** Jan-Eze Plating at the time of this violation was fine tuning a new system that they had installed. They did call me about the violation within twenty-four hours of becoming aware of the violation. This violation was but a small fraction of being out of limits. As Pretreatment Coordinator I felt a re-sample would be good enough with no violation being issued due to the fraction of the violation and the tuning of the new system. All was by telephone. I did not record this conversation. I now have purchased a recorder to record our conversations and will keep phone records updated so.

3. **FINDING:** During the file review, at least one of Jan-Eze's periodic compliance reports did not include a flow. The flows must be reported.

**RESPONSE:** On September 10, 2009 I (Pretreatment Coordinator) had an Audit discussion pertaining to my audit at the end of June with John Anderson, pretreatment contact for Jan-Eze Plating. We discussed in detail all of their violations, which were the responsibility of this pretreatment coordinator. We looked at all other reports and found flows. However, one particular report did not show a flow. Both myself and

John are now aware of what is needed on a report and chain of custody. We will be backing each other up, making sure this does not happen again. Can not tell you it will never happen again, but can tell you there is special attention to prevent it.

4. **FINDING:** During the file review, slug discharge potential evaluations could not be located. These slug evaluations must be documented in each IU's file (a good example "Slug Evaluation Form" was sent to the City for its use).

The documents supplied by Jan-Eze, "RCRA Contingency Plan and Emergency Procedures" and their "Accidental Spill Prevention/Response Plan" did not include the basic slug control criteria located in 40 CFR 403.8(f)(2)(vi)(A-D).

**RESPONSE:** The pretreatment coordinator has given Jan-Eze a copy of the Slug Control Evaluation Form. During our Audit questioning period the city and coordinator did discuss this issue also. Updated reports will be made and put into their file with all needed changes. As soon as these reports are completed, we will contact Allen for approval.

5. **FINDING:** Aero's permit requires them to test and sample for all TTO compounds listed under 40 CFR 433.11(e). Documentation this was occurring could not be produced. The City must enforce its IU permit provisions or remove them if deemed not necessary.

**RESPONSE:** Aero-Incorporated at this time is not in operation. Upon start-up the pretreatment coordinator will discuss the requirements as noted. A drive-by look has given evidence of no operations being performed at this plant. I will contact Tim and schedule a discussion of this requirement.

6. **FINDING:** Revise Aero's permit monitoring language to state "grab" sampling instead of "timed composites" because of their current brief discharge practices. Grab samples should be taken over the discharge period to later composite for the most representative sample, but these are not considered "timed composites".

**RESPONSE:** Aero and the city have changed the required discharge permit language as per enclosure sent with this report, #1. Aero have not been in operation since early July due to cost for needed equipment and supplies. They do not know when production will start again. If and when they start-up again the city will be notified. (see enclosure #1) in back of this report.

7. **SECTION C – RECOMMENDED POTW ACTIONS FOR IMPROVED IMPLEMENTATION OF THE PRETREATMENT AND POLLUTION PREVENTION PROGRAMS.**

**REPOSE:** Ed Carlyle, Jr., Pretreatment Coordinator, is looking over all the recommended actions that the state has recommended and will take time to work out each of them as a requirement. When each requirement is taken care of and fulfilled the state will receive the changes and what was completed. If there are any questions of concern we will contact Allen Gilliam.

8. **SECTION D – REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS.**

**FINDING:** 1. Under 40 CFR 403.9(b)(2) Submit “.. a [signed/dated] statement reflecting the endorsement or approval of the local boards or bodies responsible for supervising and/or funding the POTW Pretreatment Program...” Whether through oversight by this office or misplacement, this resolution cannot be located in the City’s current Program.

**RESPONSE:** Find enclosed a copy of Resolution No. XI – 2005 which was passed in response to a formal CAO issued against the City of Nashville’s pretreatment program in 2005. Enclosure #2.

**FINDING:** 2. Submit all necessary Pretreatment Program modifications to come into compliance with the revised “streamlining” provisions in 40 CFR 403. Keep in mind, these revision are not isolated to just the Pretreatment Ordinance.

**RESPONSE:** NRS of Hot Springs is currently working on those revision’s and also our local limits. Upon their completion and all other areas of concerns’ such as the approval from the state, city council, and published in our local paper, the response shall be complete.

The City of Nashville’s Pretreatment Coordinator will be working along with NRS consulting firm personnel, Jeremy Stone and Jason McDonald, to complete all of the requirements suggested by ADEQ, Allen Gilliam, State Pretreatment Coordinator. Upon each completion of every requirement, the city will send a response until all of the requirements are met. We appreciate ADEQ and Allen Gilliam working with us to bring the City of Nashville up too standards.

# enclosure #1

## Part 2 – MONITORING REQUIREMENTS

- A. From the period beginning on the effective date of the permit until December 18, 2012 the permitted shall monitor outfall NA001 for the following parameters, at the indicated frequency: the city will sample from the tank in the vibrating room before discharging and split the sample with Aero. Each will send to their laboratory's and wait for results before discharging, making sure limits are not exceeded.

Sample Parameter	Measurement Location	Frequency	Sample Type
Flow	2" shut-off valve NA001	Per sampling event	Batch
pH	2" shut-off valve NA001	Per sampling event	Individual Grab
BOD5	2" shut-off valve NA001	Twice per year	Grab from tank
TSS	2" shut-off valve NA001	Twice per year	Grab from tank
Cadmium (T)	2" shut-off valve NA001	Twice per year	Grab
Chromium (T)	2" shut-off valve NA001	Quarterly	Grab
Copper (T)	2" shut-off valve NA001	Twice per year	Grab
Cyanide (T)	2" shut-off valve NA001	Twice per year	Grab
Lead (T)	2" shut-off valve NA001	Twice per year	Grab
Nickel (T)	2" shut-off valve NA001	Quarterly	Grab
Silver (T)	2" shut-off valve NA001	Twice per year	Grab
Zinc (T)	2" shut-off valve NA001	Twice per year	Grab
TTO(1)	2" shut-off valve NA001	Once per permit (2)(1)	Grab
Oil and Grease	2" shut-off valve NA001	Twice per year	Grab

- 1 The permitted is required to test and sample for all TTO compounds listed under 40 CFR 433.11(e)
- 2 at a frequency listed above, once per year, or if needed, at a frequency determined by the Pre-treatment Coordinator in the case of noncompliance. In lieu of required monitoring for TTO, Permitted may submit a Toxic Organic Management Plan for approval by the Permitting Authority. However, the permitted shall test for TTO once during the life of their wastewater discharge permit. Volatile Organics for TTO sampling shall consist of a minimum of four (4) individual grabs collected during the hours of operation.
3. Note: Waste stream NA001 is considered a batch discharge to the sanitary sewer system.

- B. All handling and preservations of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit.

# enclosure #2

**NR**

August 29, 2005

Allen Gilliam  
ADEQ  
8001 National Drive, POB 8913  
Little Rock , AR 72219-8913

RE: Required Program Modifications  
Response to Audit of 2005

Dear Allen:

In response to required program modifications to bring the pretreatment program into compliance, the city Mayor and Council has adopted and passed Resolution No. XI-2005 (see enclosure #1). This resolution endorses and gives proof of support to the pretreatment program and its coordinators actions and efforts, to conform with all EPA and ADEQ regulations and requirements.

Also enclosed (enclosure's #2 , #3, and #4) you will find actions taken by Aero-Incorporated concerning zero-discharge and improvements with their system. along with sampling results taken down stream.

If you have further questions of concern, please contact me at 870-845-7402.

Sincerely,



Ed Carlyle, Jr.  
Pretreatment Coordinator

cc: Mayor, Mike Reese  
Public Works Director, Roy Garris.  
Audit File of 2005

RESOLUTION NO. XI-2005

**A RESOLUTION ENDORSING AND APPROVING THE EFFORTS OF THE CITY OF NASHVILLE WASTE WATER PRE-TREATMENT PROGRAM, AND FOR OTHER PURPOSES.**

WHEREAS, the City Council of Nashville, Arkansas, through it's ordinances regulates waste water discharge into the public sewer system, and

WHEREAS, the United States Environmental Protection Agency and the Arkansas Department of Environmental Quality, requires a formal program to require industrial users to meet City ordinance requirements, and


WHEREAS, the health and welfare of the citizens of Nashville, Arkansas are to be protected.

**NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF NASHVILLE, ARKANSAS:**

Section 1: That the City of Nashville City Council hereby endorses and approves of the Nashville Waste Water Pre-treatment actions and efforts to continue to meet EPA and ADEQ standards in its waste water pre-treatment program, and to thereby insure the health and safety of the citizens of Nashville.

Section 2: This Resolution shall be in full force and effect from and after its passage and approval.

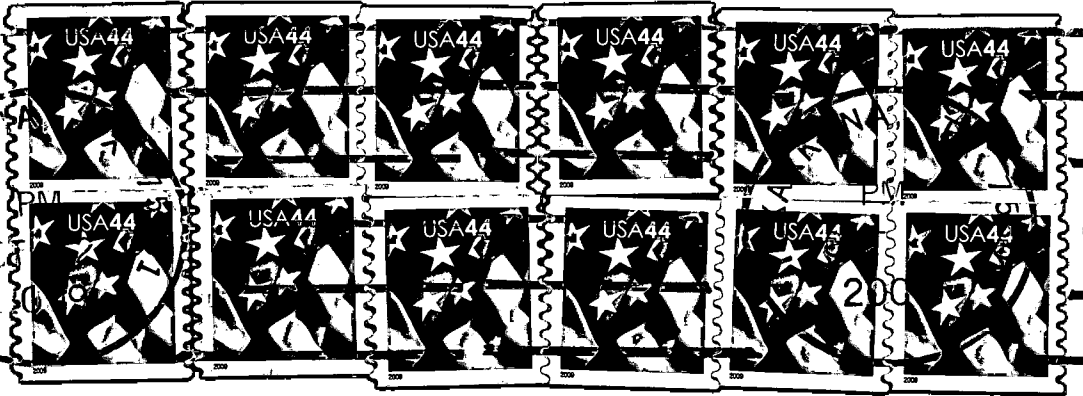
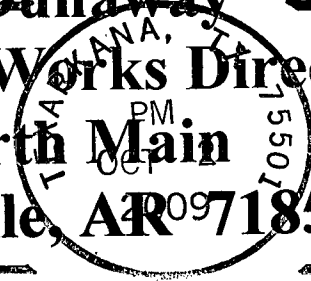
Passed this 23<sup>rd</sup> of August, 2005

  
Mike Reese, Mayor

  
Kelly Sherman, City Clerk

**enclosure #1**

**Larry Dunaway**  
**Public Works Director**  
**426 North Main**  
**Nashville, AR 71852**



**State of Arkansas**  
**Department of Environmental Quality**  
**Attn: Allen Gilliam, Pretreatment**  
**5301 Northshore Drive**  
**North Little Rock, AR 72118-5317**

