

Gage, Hannah

From: Gilliam, Allen
Sent: Wednesday, July 20, 2016 1:06 PM
To: 'larry19211@gmail.com'; nashville ed carlyle
Cc: Gage, Hannah; Leamons, Bryan; Healey, Richard; Porter, Gina
Subject: AR0021776_Nashvilles late Feb 2016 Pretreatment Audit incomplete response_20160720
Attachments: Pretreatment July 2016.pdf

Larry,

Nashville's late response to the February 2016 Audit was electronically received, reviewed and not complete.

The City's Pretreatment Program modification requirements were not addressed. Please submit within ten (10) days from the date on this correspondence a written timeline to this office when the three (3) requirements in Section D of the Audit's findings will be completed.

This office's recommendations regarding Section B audit findings' #2 would be to completely eliminate the TTO scan requirement once/five years.

It is not necessary to mail a hard copy.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Richard Healey, NPDES Enforcement Branch Manager

E/NPDES/NPDES/Pretreatment/Reports

-----Original Message-----

From: larry dunaway [<mailto:larry19211@gmail.com>]
Sent: Wednesday, July 20, 2016 10:28 AM
To: Gilliam, Allen
Cc: 'nashville ed carlyle'
Subject: Response Letter

Allen,

Here is the letter from Ed. I will mail the original.

Thank you,

Larry Dunaway
Public Works Director
Nashville, Arkansas



Nashville Public Works
Larry Dunaway
426 N Main St
Nashville, AR 71852

Cell 870-557-1953
Office 870-845-4015
Fax 870-845-7409

July 20, 2016

State of Arkansas
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Attention: Allen Gilliam

RE: City of Nashville 2016 Pretreatment Audit February 23rd and 24th 2016.
NPDES #AR0021776, AFIN #3100036

Dear Allen,

Find enclosed the responses too or corrections of implementations to your findings of our pretreatment audit. There will also be a letter no later than August 30, 2016 concerning recommendations with how the City of Nashville will correct or answer the findings in section C.

If you have any questions of concern please contact Ed or me at 870-845-4015 or 870-845-4522. As always, we appreciate your hard work and advice concerning the City of Nashville.

Sincerely,

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

Larry Dunaway
Public Works Director
City of Nashville

Cc: Ed Carlyle, Jr., Pretreatment Coordinator



Nashville Public Works
Larry Dunaway
426 N Main St
Nashville, AR 71852

Cell 870-557-1953
Office 870-845-4015
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RESPONSES TO SECTION B

1. An Industrial Survey will be sent out on Wednesday August 10, 2016 by the Pretreatment Coordinator. All information gathered will be organized and results sent to State Pretreatment Coordinator, Allen Gilliam, and two weeks later on Wednesday, August 24, 2016.
2. The City of Nashville will sample Jan-Eze Plating on August 15th and 16th of 2016. This will be a 24 hour composite sample, an unscheduled sample event for Jan-Eze Plating. Upon completion a copy shall be sent to State Pretreatment Coordinator Allen Gilliam.
3. Jan-Eze Plating official John Anderson and City of Nashville Pretreatment Coordinator shall meet on July 21, 2016 to discuss this matter and correct requirements to copy with 40 CFR 433.17. Upon conclusion a copy of the two's meeting and decision will be sent to Pretreatment State Coordinator Allen Gilliam.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of Nashville's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1) Under **40 CFR 403.8(f)(2)**, "The POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to: (i) Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users [IUs] made under this paragraph shall be made available to [ADEQ] upon request; and (ii) Identify the character and volume of pollutants contributed to the POTW by the Industrial Users identified under paragraph (f)(2)(i) of this section. This information shall be made available to the [ADEQ] upon request."

During the checklist review an index, inventory or compilation of IUs could not be produced. The City should conduct another industrial user/business survey to all potential non-domestic wastewater dischargers and create an index or compilation from each survey's pertinent information See EPA's "Guidance Manual for POTW Pretreatment Program Development" at <https://www3.epa.gov/npdes/pubs/owm0003.pdf>, Chapter 2 for details summarizing these surveys and Tables 1 and 2 for example IUs' pertinent information to be compiled/summarized.

Include screen printers, auto body repair/paint shops, hospitals, hospices, long term care facilities, dentists, chiropractors, schools (toxic/haz waste lab chemicals?), car/truck washes, machine shops, etc. Pertinent information then can be gleaned from each surveyed and digested into a spreadsheet showing which are sanitary only and those that are discharging or have the potential to discharge toxic pollutants into the City via floor drains or simply pouring their wastewater into a sink or toilet.

These survey questionnaires could be somewhat tailored to "fit" each business sector's operations and include Pollution Prevention (P2) questions regarding source reduction, waste minimization, energy and/or water conservation.

2) Jan-EZE's permit requires them "***to test and sample for all TTO compounds listed under 40 CFR 433.11(e) once per five years***" although the facility had submitted a toxic organic management plan in 1995. Under **40 CFR 403.8(f)(2)(v)**, "Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards..."

Documentation of the City's once/5 yrs "TTO" sampling could not be produced. The City must also sample Jan-EZE's wastewater once/5 yrs or remove the requirement if deemed not necessary.

3) Under *40 CFR 403.12(e)(1)*, Any Industrial User subject to a categorical Pretreatment Standard ...after the compliance date of such Pretreatment Standard, or, in the case of a New Source, after commencement of the discharge into the POTW, shall submit to the [Nashville] during the months of June and December, unless required more frequently in the Pretreatment Standard or by the Control Authority, a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical Pretreatment Standards.

It was discovered during the file review Jan-EZE's periodic reports listed their Metal Finishing permit limits intermixed with the monthly averages and daily maximums (see Attch. A-4b). This must be revised to separate and include ALL the Metal Finishing standards in 40 CFR 433.17.

C) RECOMMENDED POTW ACTIONS FOR IMPROVED IMPLEMENTATION OF THE PRETREATMENT AND POLLUTION PREVENTION PROGRAMS

1) Strongly recommend revising and dating existing fact sheet(s) in each IU file updating/including pertinent information such as: comprehensive narrative of all process/manufacturing operations, wastewater flow schematics with sampling point clearly marked, basis for permit limits, facility's authorized representative, main contact's contact information, monitoring frequency, parameters monitored for, picture of actual sampling point, brief chronological history (start-up date, compliance, e.g.) and Pollution Prevention activities.

As discussed during the audit, the basic information contained in a comprehensive IU inspection provides the bulk of a good fact sheet. These fact sheets should be sent to each knowledgeable IU representative to review and update as necessary. Inspections can reference "process/manufacturing operations", "wastewater schematics", etc. as "can be found in City's file".

2) Strongly recommend cross training another employee on ALL aspects of implementing the day-to-day procedural activities of the City's Pretreatment Coordinator.

3) Strongly recommend including in the City's Pretreatment Program standard operating procedures for the day-to-day activities of the City Pretreatment Coordinator (sampling, inspections, paperwork processing/storage, e.g.). This would be invaluable for training persons new to the program.

4) Strongly recommend revising the City's current IU inspection form (Attch. A-1). During the file review it was discovered the inspections lacked detailed information on the IUs' processes/pretreatment equipment (leaks, rusting, scale build-up, good/bad preventive maintenance, concrete floor etching, etc.); had vague chemical/haz waste storage and nothing regarding handling procedures. The City should add a few more paragraphs to include these particular areas to "evaluate" during an inspection. See "Audit Checklist's IU File Review, Section 9.a. through 9.q."