

# ADEQ

ARKANSAS  
Department of Environmental Quality

SEP 5 2013

Mike Roberts  
Wastewater Manager  
Bentonville Wastewater Department  
1901 N.E. A Street  
Bentonville, AR 72712

Re: Bentonville's (NPDES #AR0022403) Pretreatment Program Audit/Municipal Pollution Prevention Assessment

Dear Mr. Roberts,

Please find enclosed the finished report for the audit/assessment conducted August 20<sup>th</sup> through August the 22<sup>nd</sup>, 2013. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the recommendations and required actions. Please submit a written response within thirty (30) days from the date on this correspondence describing the corrective action that will be taken to resolve the one (1) deficiency discovered during the Audit.

The City appears to have personnel knowledgeable and interested in both the Pretreatment and Pollution Prevention Programs and their implementation. Many of the audit/assessment recommendations are meant to aide your Programs to further evolve in achieving the Clean Water Act's objectives to eliminate discharge of pollutants to the environment.

It was a pleasure working with you and your staff during the audit and becoming more familiar with Bentonville, its industries, Pretreatment Program and "Clean Kitchen Practices" program. If there are further questions, please feel free to contact this office.

Sincerely,



Allen Gilliam  
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist

cc: Craig Uyeda, Enforcement Branch Manager  
Jason Bolenbaugh, Inspector Supervisor  
Rudy Molina, EPA 6W-PO

E/NPDES/NPDES/Pretreatment/Reports

**PRETREATMENT AUDIT REPORT  
FOR THE CITY OF BENTONVILLE, ARKANSAS  
NPDES PERMIT #AR0022403**

**August 29, 2013**

**PREPARED BY:**

**ALLEN GILLIAM**

**STATE PRETREATMENT COORDINATOR**

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY**

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- B) Summary of Findings with Required Actions
- C) Recommended POTW Actions for Improved Implementation or Enforcement of the Pretreatment and Pollution Prevention Programs
- 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

## ***LIST OF ATTACHMENTS***

Pretreatment Program Audit checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachments A-1, A-2 and A-3: Supporting Documentation

## ***A) INTRODUCTION***

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

With Pollution Prevention (P2) being integrated into Pretreatment Programs, assessments of these Cities' P2 projects and programs will be made.

An audit/assessment was performed August 20 through August 22, 2013, of the Pretreatment Program implemented by the City of Bentonville, Arkansas. Participants included:

|               |   |
|---------------|---|
| Allen Gilliam | ADEQ / Pretreatment Coordinator                     |
| Nancy Busen   | City of Bentonville / Pretreatment Coordinator      |
| Roman Rios    | City of Bentonville / Lab - Pretreatment Technician |
| Mike Roberts  | City of Bentonville / Wastewater Manager            |

The goals of the audit/assessment were:

- \* To determine the implementation and compliance status of the City of Bentonville's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403;
- \* To determine the effectiveness of the City of Bentonville's Pretreatment and P2 Programs in controlling industrial discharges and elimination or reducing toxic pollutant discharges;
- \* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements; and
- \* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

Bentonville's Pretreatment Program was originally approved 11/28/84. Program modifications were submitted, approved and incorporated into their NPDES permit on 10/6/95 and again on 12/6/04. The modifications included program narrative revisions, re-evaluation of maximum headworks loadings (MAHLs), incorporation of an ERP and Pretreatment Ordinance revisions.

The City submitted an approved and adopted Pretreatment Ordinance on 8/14/12, first draft Program narrative modifications to be current with the "Streamlining" revisions to 40 CFR 403 on 3/15/13 and is currently re-evaluating its MAHL/MAIL. These submittals are pending review for completeness. This office will assist the City in its MAHL/MAIL re-evaluation.



Bentonville's POTW processes include extended aeration basins; anoxic basins; alum addition as necessary; final clarification, post aeration and UV disinfection prior to its discharge to Town Branch Creek.

There has been no pattern of toxicity, lethality or sub-lethality over the last five (5) year period.

As of about July 2010 the City diverted ~1 MGD of its residential/light commercial flow to the Northwest Arkansas Conservation Authority (NACA). The City's design flow is 4 MGD but currently averages about 3.14 MGD with 3 significant industrial users (SIU); one being a small pharmaceutical categorical. The City's largest contributor, Kraft Foods is currently in a shut-down mode with ~60% of its production equipment removed to their sister facility in Missouri. With its decrease in production, therefore flow, all three SIUs currently contribute ~0.10 MGD making up about 3% of the average daily flow. Kraft is to be completely shut down before the end of 2013.

Approximately 1,000 dry tons/year of Class A sludge is composted and is given away to the public or land applied by a contractor in Kansas.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to their three (3) significant industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachment(s) A.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

## **B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS**

**1a)** Under **40 CFR 403.12(b)** *Reporting requirements for industrial users upon effective date of categorical pretreatment standard—baseline report.* "...existing Industrial Users subject to such categorical Pretreatment Standards and currently discharging to or scheduled to discharge to a POTW shall be required to submit to the Control Authority a report which contains the information listed in paragraphs (b)(1)-(7) of this section." **(B)** Description of operations. The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes.

**1b)** Under the City's **Pretreatment Ordinance #2012-65, Article V, Section 6**, "Users required to obtain an industrial wastewater discharge permit shall complete and file with the city an application in the form prescribed by the City. In support of the application, the user shall submit, in units and terms appropriate for evaluation, the following information as applicable:

(f) Comprehensive site plans, floor plans, mechanical and plumbing plans, and details to show all sewers, sewer connections, floor drains and appurtenances by size, location and elevation; (g) The location for monitoring all wastes covered by the permit; and (h) Comprehensive narrative description of activities, facilities and plant processes on the premises, including all materials which are or could be discharged...”

None of the three (3) SIUs the City had permitted had a clear/understandable wastewater flow schematic (see Attachment A-3 for example) or a good comprehensive process narrative. The City must enforce the Federal Requirements as well as their own Pretreatment Ordinance. The City should require its SIUs to update their schematics to more clearly show the exact sampling point and describe all their wastewater generating operations.

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

1) Recommend including more narrative information on chemical handling practices, chemical storage/secondary containment and wastewater generating processes on the IU inspections, not just boxes for checkmarks. Questions asked or areas actually viewed by the City inspector during the walk through portion of the inspection should include a written explanation of what they have observed.

Once a comprehensive inspection form is completed, a work copy of it can be used on subsequent inspections with the first question asked, “Has there been any changes/additions to your processes, chemicals or raw material?” If the facility representative answers “No”, then the physical walk-through of the process/manufacturing area can proceed to verify no changes have been made.

2) Recommend continuing to send industry/business sector surveys to all non-domestic dischargers. Modify the surveys to include sector specific waste questions. The last one conducted in June of '08 and the time elapsed would deem this procedure due.

These surveys should be summarized with the most pertinent information compiled for each industry or business.

40 CFR 403.8(f)(2)(i) states, “Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request...” This office could interpret that to mean an actual index or summary of ALL IU surveys should be developed and kept on file, not just the returned survey forms.

3) Include P2 and BMP questions on all SIU permit applications.

4) Recommend sending out the hazardous waste notification under 40 CFR 403.12(p) to the new generators identified on the ADEQ list provided during the audit.

5) Continue with the outreach efforts to the general public on grease abatement and the problems with “wet wipes” as well as proper disposal of pharmaceuticals. A newspaper article may reach more people than just the fliers already being handed out.

**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**

The City has submitted draft Program narrative modifications to be current with the “Streamlined” version of the 40 CFR 403 National Pretreatment Regulations. This office has made a preliminary review with comments and recommendations. This document must be submitted as a final and approvable document.

This office will aid the City in its re-evaluation of the maximum allowable headworks and industrial loadings.

\* \* \* \* \*

The City should consider the required actions and recommendations contained in this audit/assessment before finalizing any pretreatment program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, should be submitted to ADEQ for review and approval.

# PRETREATMENT AUDIT CHECKLIST

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

|              |   |             |
|--------------|---|-------------|
| Section I:   | General Information . . . . .             | Pages 1- 4  |
| Section II:  | Pretreatment Program Analysis . . . . .   | Pages 5-15  |
| Section III: | Industrial User File Evaluation . . . . . | Pages 16-23 |

### SECTION I: GENERAL INFORMATION

**A. GENERAL INFORMATION**

Control Authority Name: City of Bentonville NPDES #: AR0022403  
 Mailing address: 1901 NE "A" Street, Bentonville AR 72712  
 Permit Signatory: David Mike Roberts Title: Wastewater Manager  
 Telephone: 479.271.3160 FAX NUMBER: 479.271.3163  
 Pretreatment Contact: Nancy Busen Title: Lab/Pretreatment Coordinator  
 Address: same  
 Telephone: same  
 E-address nbusen@bentonvillear.com & rrios@bentonvillear.com  
 Pretreatment program approval date: 11/28/84

Dates of approval of any substantial modifications: 10/6/95 and 12/6/04

Month Annual Pretreatment Report Due: November

Pretreatment Year Dates: 11/1 - 10/31 Date(s) of Audit: 8/20 thru 8/22/13  
 (ASSESSMENT)

Inspector(s):

| <u>NAME</u>          | <u>TITLE/AFFILIATION</u>       | <u>PHONE NUMBER</u> |
|----------------------|--------------------------------|---------------------|
| <u>Allen Gilliam</u> | <u>Pretreatment Coord/ADEQ</u> | <u>501.682.0625</u> |

Control Authority representative(s):

| <u>NAME</u>         | <u>TITLE</u>                    | <u>PHONE NUMBER</u> |
|---------------------|---------------------------------|---------------------|
| <u>*Nancy Busen</u> | <u>Pretreatment Coordinator</u> | <u>479.271.3160</u> |
| <u>Roman Rios</u>   | <u>Lab/Pret. Tech.</u>          | <u>"</u>            |

\* Identifies Program Contact

Dates of Previous PCIs/Audits:

| <u>TYPE</u> | <u>DATE</u>    | <u>DEFICIENCIES NOTED</u> |
|-------------|----------------|---------------------------|
| <u>PCI</u>  | <u>6/18/12</u> | <u>None apparent</u>      |

YES NO

Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action: N/A

Is the Control Authority currently in SNC or RNC?

.....  
The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with an asterisk or footnote that tells that there is more explanatory information and where it can be found.

**SECTION I: GENERAL INFORMATION**

**B. TREATMENT PLANT INFORMATION**

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

| NPDES Permit No. | Name of Treatment Plant  | Effective Date | Expiration Date |
|------------------|--------------------------|----------------|-----------------|
| *AR0022403       | Bentonville WW Utilities | 3/1/09         | 2/28/14         |

\* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Bentonville Wastewater  
 Location Address: 1901 NE A Street, 72712

Treatment Plant Wastewater Flow: Design- 4.0 MGD; Actual (Average)- 3.14 MGD  
 [near 7/11 ~1 MGD of residential/light commercial was diverted to NACA]

Sewer System: 100 % Separate; # of SSOs due to grease blockages 4

Industrial Contribution to this Treatment Plant

# of SIUs: 3 # of CIUs: 1  
 Industrial Flow (mgd): 0.30 Industrial Flow (%): 10 %

Level of Treatment

Type of Process(es):

Primary  \_\_\_\_\_  
 Secondary  aeration basins; anoxic basins; alum addition  
 Tertiary \_\_\_\_\_ as necessary; final clarifiers & post aeration

Method of Disinfection: UV

Dechlorination  YES  NO

Effluent Discharge

Receiving Stream Name: Town Branch then to Little Sugar Creek then the Elk River

Receiving Stream Classification: Segment 3J of Ark River Basin

Receiving Stream Use: secondary contact rec; raw water source for domestic, industrial and ag. water supplies; propagation of desirable species of fish

If effluent is disposed of to any location other than the receiving stream, please note: n/a

Method of Sludge Disposal:

Quantity of Sludge:

|  |                          |
|--|--------------------------|
| <input checked="" type="checkbox"/> Land Application | <u>~400</u> dry tons/yr. |
| <input type="checkbox"/> Incineration                | _____ dry tons/yr.       |
| <input type="checkbox"/> Monofill                    | _____ dry tons/yr.       |
| <input type="checkbox"/> Mun. Solid Waste Landfill   | _____ dry tons/yr.       |
| <input type="checkbox"/> Public Distribution         | _____ dry tons/yr.       |
| <input type="checkbox"/> Lagoon Storage              | _____ dry tons/yr.       |
| <input checked="" type="checkbox"/> Other            | <u>~600</u> dry tons/yr. |

(60% composted & given to public. The other is filter press de-watered and land applied in KS)

List of toxic pollutant limits in NPDES permit: conventionals; T.Phos; WET; NH3-N

**SECTION I: GENERAL INFORMATION**

a. (continuation of individual treatment plant information for Bentonville Wastewater Treatment Plant.)

YES NO Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: ADEQ  
 Issuance Date: same  
 Expiration Date: same

List pollutants that are specified in current sludge permit:  
Reference to CFR 503 parameters and loading rates

YES NO N/A Has the Control Authority submitted results of whole effluent biological toxicity testing.

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There has been no trend showing lethality nor sub-lethality in either species in the last five (5) years.

How many times were the following monitored during the past pretreatment year?

|               | <u>Influent</u> | <u>Effluent</u> | <u>Sludge</u> | <u>Ambient</u> |
|---------------|-----------------|-----------------|---------------|----------------|
| Metals *      | <u>4</u>        | <u>4</u>        | <u>4</u>      | <u>      </u>  |
| Priority **   | <u>1</u>        | <u>1</u>        | <u>0</u>      | <u>      </u>  |
| Biomonitoring | <u>      </u>   | <u>2</u>        | <u>      </u> | <u>      </u>  |
| TCLP          | <u>      </u>   | <u>      </u>   | <u>1</u>      | <u>      </u>  |
| Other:        | <u>      </u>   | <u>      </u>   | <u>      </u> | <u>      </u>  |

\*As identified at 40 CFR 122, Appendix D, Table III, \*\*As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

"Metals have remained the same."

YES NO N/A

Has the POTW begun tracking the trends in the above samples?

Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated

Cause(s)

N/A

Has the treatment plant sludge violated the TCLP Test?

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

       Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c) (3)]

       Have any non-substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.  
Pretreatment Ordinance and Program narrative

1. Substantial Modifications: N/A

| Date Approved by ADEQ | Ordinance Citation/<br>Nature of Modification | Date Incorporated in NPDES Permit |
|-----------------------|---|-----------------------------------|
| N/A                   |   |                                   |

2. Non-Substantial Modifications in Progress:

| Date Requested | Nature of Modification                                   |
|----------------|--|
| 10/8/09        | Ordinance & Program revisions to be current with CFR 403 |

YES NO

       Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:

       Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

D. Legal Authority [403.8(f) (1)]

Date of original Pretreatment Program approval: 11/28/84 [WENDB-PTIM]  
 Date of most recent Ordinance approved by the Control authority: 8/14/12  
 Date of most recent Pretreatment Program modification approval: 12/6/04  
 Does the Control Authority's legal authority enable it to:  
 [403.8(f) (1) (i-vii)]

YES NO

- Deny or condition pollutant discharges
- Require compliance with standards
- Control discharges through permit or similar means
- Require compliance schedules and IU reports
- Carry out inspection and monitoring activities
- Obtain remedies for noncompliance
- Comply with confidentiality requirements
- Establish Pollution Prevention
- Has the city developed and adopted a Pollution Prevention policy?

YES NO

       Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

- No oversight authority
- No inspection authority
- No remedies for noncompliance
- No "equivalent" standard



**SECTION II: PROGRAM ANALYSIS AND PROFILE**

- No clear delineation of responsibility for program implementation
- Interjurisdictional agreements not entered into
- Other, Specify: \_\_\_\_\_

YES NO

- Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no: The city of Centerton has no IUs
- Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?
- Have provisions been made for the incorporation of Pollution Prevention (P2) policies by contributing jurisdictions?

List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

| <u>Name of Jurisdiction</u> | <u>Number of CIUs</u> | <u>Number of Other SIUs</u> | <u>Type of Agreement</u>     |
|-----------------------------|-----------------------|-----------------------------|------------------------------|
| 1. <u>City of Centerton</u> | <u>0</u>              | <u>0</u>                    | <u>Contract (dated 7/93)</u> |

If relying on activities of contributing jurisdictions, indicate which activities are performed by jurisdictions and describe any problems in their implementation. N/A

Problems

- Updating industrial waste survey N/A
- Notification of IUs \_\_\_\_\_
- Permit issuance \_\_\_\_\_
- Receipt and review of IU reports \_\_\_\_\_
- Inspection and sampling of IUs \_\_\_\_\_
- Assessment of IUs for P<sup>2</sup> activity \_\_\_\_\_
- Analysis of samples \_\_\_\_\_
- Enforcement \_\_\_\_\_
- Other: \_\_\_\_\_

Briefly describe other problems: \_\_\_\_\_

Identify any IUs that have caused problems of interference, upset, pass through, sludge contamination, problems in the collection system, or worker health and safety in the past 12 months:

| <u>IU Name</u> | <u>Problem</u> | <u>NPDES Permit Violation</u> |           |
|----------------|----------------|-------------------------------|-----------|
|                |                | <u>Yes</u>                    | <u>No</u> |
| <u>N/A</u>     | _____          | _____                         | _____     |

**E. Industrial User Characterization [403.8(f)(2)(i)]**

- Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *\*Sent ~ 10 surveys out to all WalMart facilities in '08. and are continually sending out surveys toe food service establishments*
- If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> activity?
- Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P<sup>2</sup> activity and the distribution of P<sup>2</sup> reference materials to the IUs which qualify?

What methods are used to update the IWS:

- Review of newspaper/phone book
- Review of plumbing/building permits
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) code enforcement compliance certification system involving all departments in now operational.

How often is the survey to be updated? ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: None apparent

YES NO

      Have any new SIUs been identified within the last 12 months? If yes:

| <u>Name of IU</u> | <u>Type of Industry</u> | <u>Is the IU Permitted?</u> |
|-------------------|-------------------------|-----------------------------|
| <u>N/A</u>        |                         |                             |

How many IUs are currently identified by the Control Authority in each of the following groups:

- a. 3 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 1 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 0 Noncategorical SIUs
- d. 3 Other regulated nonsignificant IUs (Describe) septage haulers
- 6 TOTAL of a. + d. [they also permit 10 FOG haulers (see Attachment A-2)]

YES NO

      Has the POTW identified any IUs with Pollution Prevention opportunities?  
 Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t) (1) (i-ii)]

If not, the Control Authority has defined "significant industrial user" to mean: N/A

**F. Control Mechanism Evaluation [403.8(f) (1) (iii)]**

      Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

Describe the Control Authority's approved control mechanism (e.g., permit, etc.): Permit

What is the maximum term of the control mechanism? 3 years

    0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:



**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit, or Annual Report?

If yes, complete the information below:

| Pollutant Changed  | Old MAIL | New MAIL | Reason for Change |
|--|----------|----------|-------------------|
| One final MAHL/MAIL will be conducted to be incorporated into their program narrative because of the City's population increase. With Kraft shutting down operations by the end of this year, their flows will not be taken into account. The latest MAHL/MAIL re-evaluation was conducted 1/13. |          |          |                   |

YES NO

Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]

|                   | Headworks Analysis Completed?       |                          | Local Limits Needed?     |                                     | MAIL Adopted?                       |                          | 1/13 MAIL re-evaluation in Program narrative (lb/day) based on 2.85 mgd avg POTW flow |
|-------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|---|
|                   | Yes                                 | No                       | Yes                      | No                                  | Yes                                 | No                       |   |
| Arsenic (As)      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 0.51  |
| Cadmium (Cd)      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 0.52  |
| Chromium-Total    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 16.67   |
| Copper (Cu)       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 4.50  |
| Cyanide (CN)      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 0.15  |
| Lead (Pb)         | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1.66  |
| Mercury (Hg)      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 0.004   |
| Molybdenum (Mo) * | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 0.49  |
| Nickel (Ni)       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 3.84  |
| Selenium (Se) *   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 0.17  |
| Silver (Ag)       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 2.44  |
| Zinc (Zn)         | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 4.90  |

\* - If necessary for the sludge disposal option chosen.

YES NO

Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

| POLLUTANT  | Headworks Analysis Completed?       |                          | Local Limits Needed?     |                                     | MAHL Adopted?                       |                          | MAHL Numerical Limit Adopted (lb/day) |
|------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|---------------------------------------|
|            | Yes                                 | No                       | Yes                      | No                                  | Yes                                 | No                       |                                       |
| BOD        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ?                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 12,010                                |
| TSS        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ?                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 8,340                                 |
| Ammonia-N2 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1,820                                 |
|            | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |                                       |
|            | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |                                       |
|            | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |                                       |
|            | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |                                       |

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

What method of allocation will be used for local limits for each pollutant that has a local limit in-place?

|                 | TYPE OF ALLOCATION<br>(if needed) |                                     |        |
|-----------------|-----------------------------------|-------------------------------------|--------|
|                 | Uniform<br>Concentration          | Mass                                | Hybrid |
| Arsenic (As)    | _____                             | _____                               | _____  |
| Cadmium (Cd)    | _____                             | _____                               | _____  |
| Chromium-Total  | _____                             | _____                               | _____  |
| Copper (Cu)     | _____                             | _____                               | _____  |
| Cyanide (CN)    | _____                             | _____                               | _____  |
| Lead (Pb)       | _____                             | _____                               | _____  |
| Mercury (Hg)    | _____                             | _____                               | _____  |
| Molybdenum (Mo) | _____                             | _____                               | _____  |
| Nickel (Ni)     | _____                             | _____                               | _____  |
| Selenium (Se)   | _____                             | _____                               | _____  |
| Silver (Ag)     | _____                             | _____                               | _____  |
| Zinc (Zn)       | _____                             | _____                               | _____  |
| BOD             | _____                             | <input checked="" type="checkbox"/> | _____  |
| TSS             | _____                             | <input checked="" type="checkbox"/> | _____  |

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants? \_\_\_\_\_  
N/A

**H. COMPLIANCE MONITORING**

Compliance Monitoring and Inspection Requirements:

| Program Aspect   | Approved Program | Federal Requirement | Explain Difference                    |
|------------------|------------------|---------------------|---------------------------------------|
| Inspections:     |                  |                     |                                       |
| CIUs             | <u>1 yr</u>      | 1/year              | _____                                 |
| Other SIUs       | <u>1 yr</u>      | 1/year              | _____                                 |
| Sampling:        |                  |                     |                                       |
| CIUs             | <u>1 yr</u>      | 1/year              | _____                                 |
| Other SIUs       | <u>10-12 yr</u>  | 1/year              | <u>Surcharge purposes</u>             |
| Reporting:       |                  |                     |                                       |
| CIUs             | <u>2/yr</u>      | 2/year              | _____                                 |
| Other SIUs       | <u>12 yr</u>     | 2/year              | "                                     |
| Self-Monitoring: |                  |                     |                                       |
| CIUs             | <u>2/yr</u>      | 2/year              | _____                                 |
| Other SIUs       | <u>12-365/yr</u> | 2/year              | <u>(Kraft for surcharge purposes)</u> |

| #        | %        | How many and what percentage of SIUs were:<br>(refer to p.1 for Pretreatment year)                            |
|----------|----------|---|
| <u>0</u> | <u>0</u> | Not sampled at least once in the past reporting year?   |
| <u>0</u> | <u>0</u> | Not inspected at least once in the past Pretreatment reporting year?  |
| <u>0</u> | <u>0</u> | Not inspected and not sampled at least once in the past reporting year ?<br>[WENDB-NOIN] - [403.8(f) (2) (v)] |

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected.

Does the Control Authority routinely split samples with industrial personnel:  
 YES NO  
  If requested?  
  To verify IU self-monitoring results?

## SECTION II: PROGRAM ANALYSIS AND PROFILE

Provide the following information regarding pollutant analyses done by the POTW:

|          | Analytical Method*                | Name of Laboratory       |
|----------|-----------------------------------|--------------------------|
| Metals   | ICP/MS                            | American Interplex & ETG |
| Cyanide  | spectrophotometric                | "                        |
| Organics | GS/MS                             | "                        |
| Other    | Conventional NH3, Nitrates & Phos | POTW                     |

Were all wastewater samples analyzed by 40 CFR 136 methods? *YES*

\* Enter the type of Analytical Method used for each group of pollutants. (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, etc.)

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe: they rely on State's certification process and requires the IUs to have QA/QC results with their contract labs per permit language. City participates in state's DMR cert. process getting standards from a chemical process group. They also conduct spikes and "dups" for any NPDES req'd parameter.

How much time normally elapses between sample collection and obtaining analytical results for:

1 wk Conventionals  
10 dys Metals  
10 dys Organics

Is there an established protocol clearly detailing sampling location and procedures? *\*City has a fairly comprehensive sampling SOP manual for each IU.*

Has the Control Authority had any problems performing compliance monitoring?  
 If yes, explain: N/A

Does the Control Authority use the following methods for compliance monitoring?

YES NO

Scheduled compliance monitoring  
  Unscheduled compliance monitoring  
  Demand monitoring for IU compliance  
  IU self-monitoring  
  Other: \_\_\_\_\_

Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below.

### I. ENFORCEMENT

Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)]

Does the Control Authority have a written enforcement response plan? [403.8(f)(5)].

If yes, does the plan:

YES NO

Describe how the Control Authority will investigate instances of noncompliance

Describe the Control Authority's types of escalating enforcement responses and the periods for each response

Identify by Title the Official(s) responsible for implementing each type of enforcement response

Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

- |                                     |                                |                                     |                         |
|-------------------------------------|--------------------------------|-------------------------------------|-------------------------|
| <input checked="" type="checkbox"/> | Notice or letter of violation  | <input checked="" type="checkbox"/> | Administrative Order    |
| <input checked="" type="checkbox"/> | Setting of compliance schedule | <input checked="" type="checkbox"/> | Revocation of permit    |
| <input checked="" type="checkbox"/> | Injunctive relief              | <input checked="" type="checkbox"/> | Fines (maximum amount): |
|                                     | civil                          | \$                                  | 1000 /day/violation     |
|                                     | criminal                       | \$                                  | 1000 /day/violation     |
|                                     | administrative                 | \$                                  | /day/violation          |
| <input type="checkbox"/>            | Imprisonment                   |                                     |                         |
| <input checked="" type="checkbox"/> | Termination of Service         |                                     |                         |
| <input type="checkbox"/>            | Other: _____                   |                                     |                         |

Describe any problems the Control Authority has experienced implementing or enforcing its pretreatment program: None apparent.

YES NO

- When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
- Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)]. Comment: \_\_\_\_\_

YES NO

- N/A  If no, does the Control Authority conduct all of the monitoring?
- Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

| SIU Name | Date First Identified in SNC | Enforcement Action Type | Date | Return to Compliance? |    |
|----------|------------------------------|-------------------------|------|-----------------------|----|
|          |                              |                         |      | Yes (Date)            | No |
| N/A      |                              |                         |      |                       |    |

Indicate the number and percent of SIUs that were identified as being in significant noncompliance during the past Pretreatment reporting period:

| # | % |  |
|---|---|--|
| 0 | 0 | Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)                                     |
| 0 | 0 | Self-monitoring requirements [WENDB-MSNC]  |
| 0 | 0 | Reporting requirements [WENDB-PSNC]  |
| 0 | 0 | Pretreatment compliance schedule [WENDB-SSNC]  |
| 0 | 0 | How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN] |

YES NO

- Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. \_\_\_\_\_

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

Has the Control Authority experienced any of the following:

- | <u>YES</u>                          | <u>NO</u>                           | <u>EXPLAIN and ID Industrial User</u>  |
|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Interference [WENDB]. _____  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Pass through [WENDB]. _____  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Fire or explosions? _____<br>(incl. flash point viol.)   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Corrosive structural damage? _____<br>(incl. pH <5.0).   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Flow obstructions? _____   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Excessive flow _____<br>or pollutant concentrations?   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Heat problems? _____   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Interference due to oil _____<br>or grease?  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Toxic fumes? _____   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Illicit dumping of _____<br>hauled wastes?   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f) (2) (iv)] |
| <input type="checkbox"/>            | <u>0</u>                            | How many SIUs are currently on compliance schedules?   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]                |

Indicate the number of SIUs from which penalties have been collected by the Control Authority during the past Pretreatment reporting period:

|                | <u>Number</u> | <u>Amount</u> |
|----------------|---------------|---------------|
| Civil          | <u>0</u>      | \$ <u>0</u>   |
| Administrative | <u>0</u>      | \$ <u>0</u>   |
| Total          | <u>0</u>      | \$ <u>0</u>   |

[WENDB-IUPN]

**J. DATA MANAGEMENT/PUBLIC PARTICIPATION**

- | <u>YES</u>                          | <u>NO</u>                |  |
|-------------------------------------|--------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Are inspection & sampling records well documented, organized and readily retrievable? Are files/records: |

- | <u>YES</u>                          | <u>NO</u>                |              |
|-------------------------------------|--------------------------|--------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | computerized |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | hard copy    |
| <input type="checkbox"/>            | <input type="checkbox"/> | OTHER: _____ |

Are the following files computerized:

- | <u>YES</u>                          | <u>NO</u>                           |  |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Control Mechanism Issuance               |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Inspection and Sampling schedule         |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Monitoring Data                          |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | IU Compliance Status Tracking            |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Other: <u>O &amp; G Program software</u> |

Can IU monitoring data can be retrieved by:

- |                                     |                                     |  |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Industry name  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Pollutant type   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Industrial category or type  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | SIC Code   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | IU discharge volume  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Geographic location  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Receiving treatment plant (i.e.if > one plant in the system)                             |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Other (specify) <u>SNC calculations/data can be retrieved</u>                            |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Does the POTW have provisions to address claims of confidentiality? [403.8(f) (1) (vii)] |



**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

\_\_\_ Have IUs requested that data be held confidential?

How is confidential information handled by the Control Authority?  
3M, a pharmaceutical company has submitted what they've stamped  
"Confidential" on it. City personnel keeps this info "behind lock & key"

\_\_\_ Are there significant public or community issues impacting the POTW's pretreatment program?  
If yes, please explain: new regional POTW under construction will cause an increase in taxes, sewer rates & possibly revisions to their MAHLs

\_\_\_ Are all records maintained for at least 3 years?

**K. RESOURCES**

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] \* - FTE = Full Time Equivalent Employee  
estimated at 1 & 1/2.

\_\_\_ Have any problems in program implementation been observed which appear to be related to inadequate funding?  
If yes, describe and show below the source(s) of funding for the program:

|  | <u>Percent of Total Funding</u> |
|--|---------------------------------|
| <input checked="" type="checkbox"/> POTW general operating fund (GOF)      | <u>100</u>                      |
| ___ IU permit fees   | ___                             |
| ___ monitoring charges   | ___                             |
| <input checked="" type="checkbox"/> industry surcharges (goes back to GOF) | ___                             |
| ___ other (describe) _____   | ___                             |
|  | Total 100%                      |

\_\_\_ Is funding expected to continue near the current level? If no, will it:  
Increase \_\_\_ or Decrease \_\_\_  
If no, describe the nature of the changes:

Are an adequate number of personnel available for the following program areas:

| YES                                 | NO  |   | <u>If no, explain</u> |
|-------------------------------------|-----|---|-----------------------|
| <input checked="" type="checkbox"/> | ___ | Legal assistance                                      | _____                 |
| <input checked="" type="checkbox"/> | ___ | Permitting  | _____                 |
| <input checked="" type="checkbox"/> | ___ | IU inspections  | _____                 |
| <input checked="" type="checkbox"/> | ___ | Sample collection                                     | _____                 |
| <input checked="" type="checkbox"/> | ___ | Sample analyses                                       | _____                 |
| <input checked="" type="checkbox"/> | ___ | Data analysis, review and response                    | _____                 |
| <input checked="" type="checkbox"/> | ___ | Enforcement   | _____                 |
| <input checked="" type="checkbox"/> | ___ | Administration (inc. record keeping /data management) | _____                 |

Does the Control Authority have access to adequate:

If yes then list and if no, explain

|                                     |     |                      |  |
|-------------------------------------|-----|----------------------|--|
| <input checked="" type="checkbox"/> | ___ | Sampling equipment   | <u>ISCO- 3 portables, Sigma - 1, 3 bubbler and 1 area velocity flow meters; 1 grease interceptor sampler</u> |
| <input checked="" type="checkbox"/> | ___ | Safety equipment     | <u>ventilators, gas detectors &amp; personal protective equipment.</u>                                       |
| <input checked="" type="checkbox"/> | ___ | Vehicles             | <u>one truck</u>   |
| <input checked="" type="checkbox"/> | ___ | Analytical equipment | <u>Standard equipment for conventionals</u>  |

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

**L. POLLUTION PREVENTION**

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):  
Inspections include questions about waste minimization. Presentations are given @ the elementary and high school on grease abatement & proper disposal of items ("wet-wipes, eq) that are problematic to the sewer system and treatment. The City also hands out pamphlets, etc to the public at the City EXPO, library & downtown square events.
  
2. Has the source of any toxic pollutants been identified? *No*  
If yes, what was found?  
N/A
  
3. Has the POTW implemented any kind of public education program? If yes, describe:  
Plant tours for school kids.  
Oil & Grease abatement program began in ~ 2010. Flyers are handed out in problem areas.
  
4. Does the POTW have any pollution prevention success stories for industrial users documented? no. If yes, please attach.
  
5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?  
The SIUs visited were already implementing P2 technologies. Site visits verified this as well as recycling.
  
6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants?  
If yes, which of the "Guides to Pollution Prevention" were used? \_\_\_\_\_

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name 3M ESPE Preventive Care File/ID No. CIU3M-11  
Industry Address 2501 S.E. Otis Corley Drive  
Industry Description Prescription mouthwashes and gels for dentistry produced  
Industrial Category Pharmaceutical Mfg. 40 CFR 439 SIC Code: 2834, 5122  
Avg. Total Flow (gpd) ?? Avg. Process Flow (gpd) ~50  
(intermittently)  
Industry visited during audit: YES  
Comments: \_\_\_\_\_

FILE #: 2 Industry Name Walmart TMG File/ID No. 2012-02  
Industry Address 6301 SW Regional Airport Road  
Industry Description Truck maintenance and wash facility (exterior only)  
Industrial Category N/A 40 CFR N/A SIC Code: 4173  
Avg. Total Flow (gpd) ?? Avg. Process Flow (gpd) 14,000  
Industry visited during audit: YES Randall Stafford  
Comments: Nothing contributed from the maintenance side of the facility

FILE #: 3 Industry Name Kraft Foods File/ID No. 2012-65  
Industry Address 507 S.E. 8th Street, 72712  
Industry Description Processed cheese production  
Industrial Category N/A 40 CFR N/A SIC Code: 2022  
Avg. Total Flow (gpd) ? Avg. Process Flow (gpd) 101,000

Industry visited during audit: YES  
Comments: Facility has been gradually pulling production equipment out for the last several months in preparation for a total closure.

FILE #: \_\_\_\_\_ Industry Name \_\_\_\_\_ File/ID No. \_\_\_\_\_  
Industry Address \_\_\_\_\_  
Industry Description \_\_\_\_\_  
Industrial Category \_\_\_\_\_ 40 CFR \_\_\_\_\_ SIC Code: \_\_\_\_\_  
Avg. Total Flow (gpd) \_\_\_\_\_ Avg. Process Flow (gpd) \_\_\_\_\_  
Industry visited during audit: \_\_\_\_\_  
Comments: \_\_\_\_\_

## SECTION III: INDUSTRIAL USER FILE REVIEW

### A. Industrial User Characterization

|  | <u>FILE 1</u> | <u>FILE 2</u> | <u>FILE 3</u> | <u>FILE 4</u> | <u>FILE 5</u> |
|--|---------------|---------------|---------------|---------------|---------------|
| 1. Is the IU considered "significant" by the Control Authority?  | ✓             | ✓             | ✓             | _____         | _____         |
| 2. Is the user subject to categorical pretreatment standards?    | ✓             | n/a           | n/a           | _____         | _____         |
| a. New source or existing source (NS or ES)?                     | ns            | n/a           | n/a           | _____         | _____         |
| b. Is this IU one identified as having P <sup>2</sup> potential? | no            | no            | no            | _____         | _____         |

### B. Control Mechanism

|   |      |      |      |       |       |
|---|------|------|------|-------|-------|
| 1. Does the file contain an application for a control mechanism?                          | ✓    | ✓    | ✓    | _____ | _____ |
| If yes, what is the application date?   | 6/11 | 8/12 | 7/12 | _____ | _____ |
| Does it ask for Pollution Prevention information?   | no   | no   | no   | _____ | _____ |
| 2. Does the file contain a Permit?  | ✓    | ✓    | ✓    | _____ | _____ |
| Permit Expiration Date?   | 6/14 | 9/15 | 1    | _____ | _____ |
| Is a fact sheet included?   | ✓    | ✓    | ✓    | _____ | _____ |
| 3. Has the SIU been issued a control mechanism containing: [403.8(f) (1) (iii) (A) - (E)] |      |      |      |       |       |
| a. Legal Authority Cite?  | ✓    | ✓    | ✓    | _____ | _____ |
| b. Expiration date?   | ✓    | ✓    | ✓    | _____ | _____ |
| c. Statement of nontransferability?   | ✓    | ✓    | ✓    | _____ | _____ |
| d. Appropriate discharge limitations?   | ✓    | ✓    | ✓    | _____ | _____ |
| e. Appropriate self-monitoring requirements?  | ✓    | ✓    | ✓    | _____ | _____ |
| f. Sampling frequency?  | ✓    | ✓    | ✓    | _____ | _____ |
| g. Sampling locations?  | ✓    | ✓    | ✓    | _____ | _____ |
| h. Requirement for flow monitoring?   | ✓    | ✓    | ✓    | _____ | _____ |
| i. Types of samples (grab or composite) for self-monitoring?                              | ✓    | ✓    | ✓    | _____ | _____ |

Comment: 1) Facility is supposed to have processes discontinued before the end of this year (2012) so the City has not received a new permit application.

## SECTION III: INDUSTRIAL USER FILE REVIEW

|  | <u>FILE 1</u> | <u>FILE 2</u> | <u>FILE 3</u> | <u>FILE 4</u> | <u>FILE 5</u> |
|--|---------------|---------------|---------------|---------------|---------------|
| j. Applicable IU reporting requirements?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| k. Standard conditions for:  |               |               |               |               |               |
| Right of Entry?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| Records retention?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| Civil and Criminal Penalty provisions?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| Revocation of permit?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| l. Compliance schedules/ progress reports  | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| m. General/Specific Prohibitions?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| n. Where technologically and economically achievable, are P <sup>2</sup> aspect included?  | <u>no</u>     | <u>no</u>     | <u>no</u>     | <u>      </u> | <u>      </u> |
| C. <u>Application of Standards</u>   |               |               |               |               |               |
| 1. Has the IU been properly categorized?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 2. Were both Categorical Standards and Local Limits properly applied?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]  | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| 4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]                                       | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| 5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)] | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| 6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?   | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| 7. Is the Control Authority applying a bypass provision to this IU?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |

**SECTION III: INDUSTRIAL USER FILE REVIEW**

|   | <u>FILE 1</u> | <u>FILE 2</u> | <u>FILE 3</u> | <u>FILE 4</u> | <u>FILE 5</u> |
|---|---------------|---------------|---------------|---------------|---------------|
| D. <u>Compliance Monitoring</u>   |               |               |               |               |               |
| <u>Sampling</u>   |               |               |               |               |               |
| 1. Does the file contain Control Authority sampling results for the industry?                                     | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]       | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 3. Does the sampling report(s) include: [403.8(f)(2)(vi)]   |               |               |               |               |               |
| a. Name of sampling personnel?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| b. Sample date and time?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| c. Sample type?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| d. Wastewater flow at the time of sampling?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| e. Sample preservation procedures?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| f. Chain-of-custody records?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?     | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| 5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples? | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| <u>Inspections</u> (See Attachment A-1 for example)   |               |               |               |               |               |
| 7. Does the IU file contain inspection reports?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |

**SECTION III: INDUSTRIAL USER FILE REVIEW**

|   | <u>FILE 1</u> | <u>FILE 2</u> | <u>FILE 3</u> | <u>FILE 4</u> | <u>FILE 5</u> |
|---|---------------|---------------|---------------|---------------|---------------|
| 8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)] | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| b. Date of last Inspection  | <u>6/12</u>   | <u>10/12</u>  | <u>9/12</u>   | <u>      </u> | <u>      </u> |
| 9. Does the inspection report(s) include: [403.8(f) (2) (vi)]   |               |               |               |               |               |
| a. Inspector Name(s)  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| b. Inspection date and time?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| c. Name and title of IU official contacted?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| d. Verification of production rates?  | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?                                      | <u>1</u>      | <u>1</u>      | <u>1</u>      | <u>      </u> | <u>      </u> |
| f. Evaluation of pretreatment facilities?   | <u>1</u>      | <u>1</u>      | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| g. Evaluation of self-monitoring equipment and techniques?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| h. Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| i. Manufacturing/process facilities/equipment?  | <u>1</u>      | <u>1</u>      | <u>1</u>      | <u>      </u> | <u>      </u> |
| j. Chemical handling and storage procedures?  | <u>3</u>      | <u>3</u>      | <u>3</u>      | <u>      </u> | <u>      </u> |
| k. Chemical spill prevention areas?   | <u>2</u>      | <u>2</u>      | <u>2</u>      | <u>      </u> | <u>      </u> |
| l. Hazardous waste storage areas and handling procedures?   | <u>✓</u>      | <u>✓</u>      | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| m. Sampling procedures?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| n. Laboratory procedures?   | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| o. Monitoring records?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| p. Evaluation of Pollution Prevention opportunities?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |

Comments: 1) These areas could benefit from more of a narrative description than just a check-off box. If the IU's process description is already in the City's files, the inspection form could just reference this fact; 2) Secondary containment should also be mentioned here if it's present or needed; 3) Need to include a brief narrative on how the IU transports its chemicals from point to point within the facility.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

|  | <u>FILE 1</u> | <u>FILE 2</u> | <u>FILE 3</u> | <u>FILE 4</u> | <u>FILE 5</u> |
|--|---------------|---------------|---------------|---------------|---------------|
| q. Control Authority inspector signature?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| <b><u>IU Self-Monitoring and Reporting</u></b>   |               |               |               |               |               |
| 10. Does the file contain self-monitoring reports?                                     | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 11. Does the file include:   |               |               |               |               |               |
| a. BMR?  | <u>✓</u>      | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| b. 90-Day Report?  | <u>✓</u>      | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| c. All periodic reports?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| d. Compliance schedule reports?  | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| 12. Did the IU report on all required parameters?                                      | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 13. Did the IU comply with the required sampling frequency(s)?                         | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 14. Did the IU report flow?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 15. Did the IU comply with the required reporting frequency(s)?                        | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 16. For all SIUs, are self-monitoring reports signed and certified?                    | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 17. Did the IU report all changes in its discharge?<br>[403.12(j)]                     | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| 18. Has the IU developed a Slug Control and Prevention Plan?                           | <u>no</u>     | <u>no</u>     | <u>no</u>     | <u>      </u> | <u>      </u> |
| 19. Has the industry been responsible for spills or slug loads discharged to the POTW? | <u>no</u>     | <u>no</u>     | <u>no</u>     | <u>      </u> | <u>      </u> |
| If yes, does the file contain documentation regarding:                                 |               |               |               |               |               |
| a. Did the spill cause Pass Through or Interference?                                   | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| b. Did POTW respond to the spill?  | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |



## SECTION III: INDUSTRIAL USER FILE REVIEW

|   | <u>FILE 1</u> | <u>FILE 2</u> | <u>FILE 3</u> | <u>FILE 4</u> | <u>FILE 5</u> |
|---|---------------|---------------|---------------|---------------|---------------|
| <b>E. Enforcement</b>   |               |               |               |               |               |
| 1. Were all discharge violations identified in: [403.8(f)(2)(vi)]                                 |               |               |               |               |               |
| a. Control Authority monitoring results?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| b. IU self-monitoring results?  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| c. If NS CIU was it compliant within 90 days from commencement of discharge?                      | <u>✓</u>      | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |
| 2. How many reports submitted during the past reporting year indicated discharge violations?      | <u>0</u>      | <u>1</u>      | <u>48</u>     | <u>      </u> | <u>      </u> |
| 3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)? | <u>n/a</u>    | <u>✓</u>      | <u>1</u>      | <u>      </u> | <u>      </u> |
| 4. Was additional monitoring conducted within 30 days after each discharge violation occurred?    | <u>n/a</u>    | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 5. Were all nondischarge violations identified in the file?                                       | <u>n/a</u>    | <u>n/a</u>    | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 6. Was the IU notified of all violations?   | <u>n/a</u>    | <u>✓</u>      | <u>1</u>      | <u>      </u> | <u>      </u> |
| 7. Was follow-up enforcement action taken by the Control Authority?                               | <u>n/a</u>    | <u>n/n</u>    | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 8. Did the Control Authority follow its approved ERP?   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| 9. Did the Control Authority's enforcement action result in the IU achieving compliance?          | <u>✓</u>      | <u>✓</u>      | <u>no</u>     | <u>      </u> | <u>      </u> |
| 10. Is there a compliance schedule?<br>If yes:  | <u>no</u>     | <u>no</u>     | <u>2</u>      | <u>      </u> | <u>      </u> |
| 11. Were there any compliance schedule violations?  | <u>n/a</u>    | <u>n/a</u>    | <u>no</u>     | <u>      </u> | <u>      </u> |

Comments: 1) IU and/or the City samples almost 365 days/yr. The City gets the lab reports the same time as the IU. Sending/receiving formal "violation letters" was felt to be a waste of effort. It was just a given the IU was going to be in violation of one or two of the conventional parameters, but not reaching the SNC criteria; 2) The compliance schedule deadline has not been reached. It is not one that the IU can meet because of lack of room to install proper pretreatment. The IU has been dismantling its production line and will be completely shut down before the end of 2013.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

|  |               |               |               |               |               |
|--|---------------|---------------|---------------|---------------|---------------|
| 12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)] | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| During evaluation for SNC, did the CA consider each of the following criteria?     |               |               |               |               |               |
| a. Chronic violations  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| b. TRC   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| c. Pass through/Interference   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| d. Spill/slug loads  | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| e. Reporting   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| f. Compliance schedule   | <u>✓</u>      | <u>✓</u>      | <u>✓</u>      | <u>      </u> | <u>      </u> |
| g. others (specify)  | <u>      </u> | <u>      </u> | <u>      </u> | <u>      </u> | <u>      </u> |
| 13. Was the SIU published for SNC?   | <u>no</u>     | <u>no</u>     | <u>no</u>     | <u>      </u> | <u>      </u> |
| Date of publication.   | <u>n/a</u>    | <u>n/a</u>    | <u>n/a</u>    | <u>      </u> | <u>      </u> |

**REPORTABLE NONCOMPLIANCE (RNC)**  
**for the Pretreatment Audit Checklist**  
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Bentonville NPDES #: AR0022403  
Date of Audit: 8/20 - 8/22/13 Date entered into QNCR: 8/29/13  
(ASSESSMENT)

|    |  | Level |
|----|--|-------|
| NO | Failure to enforce against pass through and/or interference                | I     |
| NO | Failure to submit required reports within 30 days                          | I     |
| NO | Failure to meet compliance schedule milestone date within 90 days          | I     |
| NO | Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months | II    |
| NO | Failure to inspect or sample 80% of SIUs within the last reporting year    | II    |
| NO | Failure to enforce pretreatment standards and reporting requirements       | II    |
| NO | Other violations of concern  | II    |

**SIGNIFICANT NONCOMPLIANCE (SNC)**

- NO Is the Control Authority in SNC for violation of any Level I criterion.
- NO Is the Control Authority in SNC for violation of 2 or more Level II criterion.

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Bentonville NPDES #: AR0022403 Name, address and phone number of industry:

Walmart TMG, 6301 SW Regional Airport Rd., 479.254.3257 c-704.974.2324

Type of industry: Truck Maintenance & Wash Date/Time of visit:  
8/21/13 / 9:05 a.m.

Industry contacts: Bruce Learned - Service Mgr.

|   | Yes | No                                  | N/A                                 |
|---|-----|-------------------------------------|-------------------------------------|
| 1. Significant industrial user?                       |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 2. Classified correctly?                              |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 3. Pretreatment equipment or procedures?              |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 4. Pretreatment equipment maintained and operational? |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 5. Hazardous waste generated or stored?               |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 6. Proper solid waste disposal?                       |     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 7. Solvent management/TTO control?                    |     | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 8. Suitable sampling location?                        |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 9. Appropriate self-monitoring procedures/equipment?  |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 10. Adequate spill prevention and control?            |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 11. Industrial familiar with limits and requirements? |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 12. Pollution Prevention activity                     |     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

#### Additional comments:

Facility's operations have not substantially changed since the last Audit's site visit ~ 3 years ago. The IU's wastewater generation comes from the washdown of their "18-wheelers" which consists of a fleet of around 230 tractors. Trailer washes - probably about 150/month. Facility uses a "Whiting System" for their wash system design/construction. The wash rack is an electronically started, "gantry" with spray nozzles which travels the length of truck covering both sides and the top, back and forth until cycle is complete. Any washwater is contained in the wash bay and sent through the sand-oil separator.

Visit conducted by: Gilliam/Bugen/Rios Date: 8/21/13

*Allen D. Rios*  
(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**  
**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Bentonville NPDES #: AR0022403

Industry name: Walmart TMG (fleet maintenance)

Additional comments:

Wash now includes soap, no (phos. acid) brightener - "elbow grease", high pressure city water rinse, wax applied followed by a spot-free softener rinse. All chemicals used in washing is contained in 250 gallon totes within the covered wash bay.

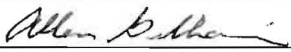
The below grade maintenance bay had no floor drains with a movable cross bay tray used to capture most of any oils or fluids from reaching the bay floor.

All oils and antifreeze from maintenance is recycled, coolants are recovered in drums and sent off-site. Other than a sand oil separator, the facility doesn't require any additional pretreatment to meet the City's requirements.

Sampling point adequate and clean. Flow totalizer is "Hydroranger". The most recent calibration record (7/13) was attached.

Various chemicals (engine/hydraulic oils, windshield wash fluid and grease) were kept in a centralized area. The two floor drains in that area only had strainers in them. The City asked that they be sealed. Engine oils were transferred overhead to the various work stations while other fluids were pumped into ~2 gallon hand carried buckets with spouts. The sampling point (manhole) was painted yellow. ~15' below grade was the parshall flume from which samples were taken. Taking samples from ground level looked rather difficult to this auditor. Other than sand-oil separators, the facility needs no additional treatment to meet their permit limits.

Visit conducted by: Gilliam/Busen/Rios Date: 8/21/13

  
\_\_\_\_\_  
(signature of auditor conducting visit)

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Bentonville NPDES #: AR0022403 Name, address and phone number of industry:

Kraft Foods, 507 S.E. "E" Street, 479.273.5561

Type of industry: Cheese by-product Mfg. Date/Time of visit:  
8/21/13/ 10:20 a.m.

Industry Contacts: Jane Reagan - Safety, Security & Env. Mgr. & Martin Carrasco-Lozano - Plant Manager

|   | Yes        | No         | N/A        |
|---|------------|------------|------------|
| 1. Significant industrial user?                       | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 2. Classified correctly?                              | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 3. Pretreatment equipment or procedures?              | <u>✓*</u>  | <u>   </u> | <u>   </u> |
| 4. Pretreatment equipment maintained and operational? | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 5. Hazardous waste generated or stored?               | <u>   </u> | <u>   </u> | <u>✓</u>   |
| 6. Proper solid waste disposal?                       | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 7. Solvent management/TTO control?                    | <u>   </u> | <u>   </u> | <u>✓</u>   |
| 8. Suitable sampling location?                        | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 9. Appropriate self-monitoring procedures/equipment?  | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 10. Adequate spill prevention and control?            | <u>   </u> | <u>   </u> | <u>✓</u>   |
| 11. Industrial familiar with limits and requirements? | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 12. Pollution Prevention activity                     | <u>✓</u>   | <u>   </u> | <u>   </u> |

\*pH adjustment only

#### Additional comments:

The facility has not substantially changed operations since the audit's site visit ~ 3 years ago although ~60% of its production equipment has been moved to their sister plant in Missouri. This facility will be shut down before this year's up because of economic factors. Their final product is cultured concentrate cheese (CCC) is their only basic process equipment is left for minimal production.

Visit conducted by: Gilliam/Busen/Rios Date: 8/21/13

Allen Gilliam  
(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**  
**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Bentonville NPDES #: AR0022403 Industry  
name: Kraft Foods

Additional comments: All process wastewater is basically equipment washdown which gravity flows to two (2) parallel outside containment pits. The volume and retention time of these pits do not have the capacity for any biological treatment.

Raw materials used in product include milk, cream, salt, rennet and bacterial cultures. Mixing of these ingredients are done in the "clean" building in stainless steel vessels and tubing. End product is not saleable cheese at this point, but a flavor alternate cheese whey goes into their final cheese product elsewhere. Kraft Env. Management has what they call an EMS although its contents were not viewed. Employee training with changes in clean-up procedures resulted in substantially less water usage and much less phosphorous. Some internal milk vessel valves(?) were modified so less much milk was wasted. R/O helped concentrate the reject water that was sent to the City. "Pretreatment" (3 concrete in-ground cells, 2 with agitators) consists of pH adjustment (sulphuric acid) prior to discharge to the city. Some alum is added to the pits to help precipitation of solids also. Suitable sampling site inside building.

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Visit conducted by: Gilliam/Busen/Rios Date: 8/21/13



(signature of auditor conducting visit)

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Bentonville NPDES #: AR0022403

Name, address and phone number of industry:

3M ESPE, 2501 S.E. Otis Corley Drive 479.418.7502

Type of industry: Dental Care Products Date/Time visit:  
CFR 439 8/21/13 / 1:40 p.m.

Industry contacts: Lielani Crosby - Plant Mgr & Louis Maldonado -  
Quality Supv.


|   | Quality Supv.                       |                          |                                     |
|---|-------------------------------------|--------------------------|-------------------------------------|
|   | Yes                                 | No                       | N/A                                 |
| 1. Significant industrial user?                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 2. Classified correctly?                              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 3. Pretreatment equipment or procedures?              | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Pretreatment equipment maintained and operational? | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 5. Hazardous waste generated or stored?               | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 6. Proper solid waste disposal?                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 7. Solvent management/TTO control?                    | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 8. Suitable sampling location?                        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 9. Appropriate self-monitoring procedures/equipment?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 10. Adequate spill prevention and control?            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 11. Industrial familiar with limits and requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 12. Pollution Prevention activity                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |

**Additional comments:**

The facility has not substantially changed operations since the last audit's site visit ~3 years ago. They make dental creams and rinses with pharmaceutical active ingredients which they claim proprietary. They were not in production the day of this visit, therefore, no wastewater being discharged.

Their internal management practices are controlled by FDA's Title 21 Part 211 which includes equipment cleaning and maintenance, laboratory controls, records and reports and FDA's "CDER" or Manual of Policies and Procedures.

Visit conducted by: Gilliam/Busen/Rios Date: 8/21/13

  
(signature of auditor conducting visit)



# PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Bentonville NPDES #: AR0022403 Industry  
name: 3M ESPE

Additional comments:

What little wastewater they generate (~30 gpd) is from their SS mixing vessels where they conduct rinsing for a subsequent "mix".

Facility rep indicated they had written cleaning procedure between products changes. Rinses are with city water. Different flavors are used with their proprietary pharmaceutical active ingredients. They batch discharge only 3 to 5 gallons per rinse cycle into a restaurant sized SS sink.


Everything seen was stainless steel and completely sanitized.

The facility's chemical storage area was very small and a comment was made about their hazardous waste barrel which was situated on a spill pallet next to and slightly above the drain from their safety water rinse shower. The facility rep was asked if it could be located a further distance away from this emergency shower.

Some of products ingredients do contain or are called cavarinse, theraspray, periomix, glycerin, stannous and sodium flouride, JFK bubble gum and strawberry flavorings to name a few.

The City reps were familiar with IU's operations and discharge practices.

Visit conducted by: Gilliam/Busen/Rios Date: 8/21/13

  
(signature of auditor conducting visit)

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Bentonville NPDES #: AR0022403 Name, address and phone number of industry:

The Bradford House, 1202 SE 30<sup>th</sup> Street

Type of industry: Extended Care Facility Date/Time of visit:

8/22/13 / 9:00 a.m.

|   | Yes          | No           | N/A          |
|---|--------------|--------------|--------------|
| 1. Significant industrial user?                       | <u>   </u>   | <u>  ✓  </u> | <u>   </u>   |
| 2. Classified correctly?                              | <u>  ✓  </u> | <u>   </u>   | <u>   </u>   |
| 3. Pretreatment equipment or procedures?              | <u>   </u>   | <u>   </u>   | <u>  ✓  </u> |
| 4. Pretreatment equipment maintained and operational? | <u>  ✓  </u> | <u>   </u>   | <u>   </u>   |
| 5. Hazardous waste generated or stored?               | <u>   </u>   | <u>   </u>   | <u>  ✓  </u> |
| 6. Proper solid waste disposal?                       | <u>  ✓  </u> | <u>   </u>   | <u>   </u>   |
| 7. Solvent management/TTO control?                    | <u>   </u>   | <u>   </u>   | <u>  ✓  </u> |
| 8. Suitable sampling location?                        | <u>  ✓  </u> | <u>   </u>   | <u>   </u>   |
| 9. Appropriate self-monitoring procedures/equipment?  | <u>   </u>   | <u>   </u>   | <u>  ✓  </u> |
| 10. Adequate spill prevention and control?            | <u>   </u>   | <u>   </u>   | <u>  ✓  </u> |
| 11. Industrial familiar with limits and requirements? | <u>  ✓  </u> | <u>   </u>   | <u>   </u>   |
| 12. Pollution Prevention activity                     | <u>   </u>   | <u>   </u>   | <u>  ✓  </u> |

Additional comments: A long term care facility was visited to observe the City's "Clean Kitchen Practices" program w/food service establishments. This facility just had a cafeteria for its residents, but had the required 2-cell grease interceptor (~49" deep). City personnel uncovered the 2<sup>nd</sup> cell and removed its hard plastic-like cover. By lowering his grease interceptor "tube" into the cell and opening the bottom of the tube, he was able to capture and ascertain the depth of grease on top (~1") and food solids (~5") at the bottom of the tube. Following the "25% rule" the 49" tube had not exceeded the 25% grease limit and was deemed properly maintained. Personnel at the facility mentioned before the City's program, the interceptor's smell was "incapacitating" and swarming with flies.

Visit conducted by: Gilliam/Rios Date: 8/22/13

*Alan Gilliam*  
(signature of auditor conducting visit)

**City of Bentonville  
Wastewater Utilities**

**Industrial Pretreatment Division**

**Compliance Inspection Report**

Name of Permittee **Wal-Mart Fleet Maintenance Garage**

Date and time of Inspection **October 10<sup>th</sup>, 2012 at 10:00am**

City of Bentonville Representative(s): **Roman Rios, Nancy Busen**

Facility Representative(s):

**Bruce Learned, Service Manager, Truck Shop 6701**

**479-254-3257 Cell: 704-974-2324**

Announced Inspection  Unannounced Inspection

**Part 1. General Information**

Categorical IU  Non-categorical SIU

Industry Type **Wal-Mart truck fleet maintenance & washing facility.**

Applicable SIC Code(s) **4173**

Manufacturing processes used **N/A**

Raw materials used **N/A**

**Loading / Receiving Docks**

Drains or Sumps ?  Yes  No  N/A

Regulated Wastestream: **Wastewater from truck washing and floor cleaning in maintenance bay.**

Outfall Description: **Location: Take Airport Road from Bentonville (Walton Avenue). Turn left at second entrance to Wal-Mart airport facility, go to the west side of building # 6301. Approximately 40 feet from the center of the building you will see 2 manhole covers. The cover nearest the building (Painted yellow & marked with a stencil) contains a 6" Palmer –**



**Part 2. Treatment Facility Evaluation, Pollution Prevention Activities, Spill and Slug Control**

Is the permittee currently experiencing difficulties in treatment or plant operation ?

Yes                  No  
                 

Overall evaluation of the permitted IU's treatment facility / operation of facility:

Housekeeping:     Excellent  Good     Fair     Poor

Comments:

Yes                  No

- Are there O & M policies and procedures ?
- Is mode of operation consistent with procedures in the O & M manual ?
- Is employee training conducted ? **Initial & ongoing required training.**
- If yes, are *regular* training sessions conducted ? At least **Once** per year.

Comments: **Training of various kinds is ongoing per government & Wal-Mart requirements.**

**Pollution Prevention Activities**

Does the permitted IU utilize any of the following Pollution Prevention (P2) measures ?

Yes                  No

- Technology Changes.
- Input Material Substitutions
- Product Changes
- Recycling    If yes, type of items recycled  
**Oil, Florescent lights, Anti-freeze, Batteries, Cardboard, Paper, Aluminum, copper and plastic bottles.**
- Employee Training **Yearly**

**Spill and Slug Control:**

Describe the impact a slug load from this facility would have on the POTW:

*A/c*

Considering the relatively small flow and long inline mixing of the facilities discharge, unless an entire 800 gallon tank ruptured, there would be little concern. If that happened, the issues would be; corrosive or acidic discharge damaging the sewer lines and possible impact on the POTW from increased BOD loading.

Yes No N/A

- Does Permitted IU have a written Spill / Slug Control Plan ?  
**RCRA and SPCC**
- Are employees routinely trained in Spill / Slug Control ? **Once per yr. Plus Initial Employee Training**
- Is there written documentation of Spill / Slug Control training ?
- Do process solution tanks overflow ?
- If so, is liquid contained ? How ?
- Has the facility had any past slug discharges ?
- Is there an alarm system for equipment failure ?  
**Fuel tank only(storm water issue)**
- Is the POTW phone number prominently displayed for personnel in case of spill or slug loads on evening or night shifts?
- Are there floor drains or trenches ?  
Routed to: **Sand-oil separator. Floor drains in critical area are plugged.**
- Does the Control Authority require additional Slug / Spill control Measures?

Spill potential :  High  Medium  Low

Comments:

**Pretreatment System**

Yes No N/A

- Is discharge pH adjustment necessary ?
- Spare pretreatment equipment parts on site ?
- Is there an alarm system for equipment failure ?
- Is there a posted Emergency Response Plan for failure ?

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## Chemical Storage

What chemicals are used at the facility ?

| Chemical Name (Use)                         | Amount Used        |
|---|--------------------|
| SmartWash (Dri Wax)                         | 0.4 Gallons/day    |
| 50% Ethylene Glycol (Anitfreeze)            | 40 Gallons/month   |
| Mobilith SHC 007 (Bearing Grease)           | 3 gallons/month    |
| SmartWash WWA (Window Washer Anitfreeze)    | 330 Gallons/year   |
| SmartWash TORNADO                           | 8 Gallons/day      |
| SmartWash SW-1A (Citric Acid)               | 4 Gallons/day      |
| SC-200                                      | 55 gallons/year    |
| Mobile Centaur Moly 2 (Chasis Grease)       | 8 Gallons /month   |
| Mobile Delvac 1300 super 15W-40 (Motor Oil) | 600 gallons /month |

Description of chemical storage areas: **Bulk oil is stored in and underground oil tank. Barreled chemicals are on containment platforms. F-3 Tornado Wash and Aluminum Brightener (SmartWash SW-1) are in 800 gallon tanks in tire storage area; the floor drains are plugged.**

Yes No N/A

- Can chemicals reach floor drains if spilled ?
- Has the facility had any past chemical slug discharges ?
- If yes, was the discharge reported promptly to the Control Authority ?
- Do chemical solution tanks overflow ?
- If so, is liquid contained ?
- Does the permittee have adequate spill / slug prevention measures in place in the chemical storage area?

### Part 3. Sludge Generation / Waste Disposal

Is sludge / waste created in the IU's Process ?

Yes No

- 

Sludge / waste dewatering method used: Average Solids Content (%) **N/A**

Amount generated (gallons or lbs / month)

*A-1e*

Sludge/waste Disposal Method: **Sand-oil interceptors are cleaned by  
January Environmental  
4300 S.W. 36<sup>th</sup>  
Oklahoma City, OK 73119 (Starting May 2007)**

Sludge storage capacity **N/A**

Shipment frequency **quarterly**

Yes No

Are manifest records available ? (**Manifest is up to date**)

**Disposal location(s) Listed on Manifest documents**

Yes No N/A

Is hazardous sludge generated ?

Is hazardous waste discharged to the POTW ?

Are hazardous waste manifests available ?

Manner of hazardous waste disposal **N/A**

#### **Part 4. Analysis of Self Monitoring Program**

##### **Flow Measurement**

Yes No N/A

Is the primary measuring device in good condition ?  
Wiring connection for the sampling manhole is worn.

Secondary instruments properly operated and maintained ?

Is flow being measured accurately ?

Is there documentation of flow meter calibration ?

Are flow measurement records kept on file ?

Comments: **Instrument & Supply last calibrated the flow meter in July 2011.  
Re-certification of calibration is past due.**

##### **Sample Collection**

Yes No N/A

Does the sampling location yield well-mixed, representative samples ?



- |                                     |                          |                          |  |
|-------------------------------------|--------------------------|--------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Are samples the correct type ?   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Are sample bottles the correct type ?                                    |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Are composite samples proportional to flow ?                             |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Are samples cooled to 4° C. during collection of 24 hr. composites ?     |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Are samples preserved properly ?   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Are complete chain of custody forms filled out for each sampling event ? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Is sampling equipment clean & in good working condition ?                |

Comments:

**Wal-Mart contracts sampling and analysis through:**

**Environmental Testing Group, Inc.  
 1702 East Central  
 Bentonville, AR. 72712  
 Phone: 479-271-7996**

- | Yes                                 | No                                  | N/A                                 |   |
|-------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Does the permittee perform any of the analysis in-house ?   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | Are samples analyzed within required holding times per 40 CFR 136.3 ?   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | Are approved analytical procedures (40 CFR 136.3) used ?  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | Does sample analysis include analysis of duplicates, spikes, and standards ?  |
| <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Does permittee reject results of analysis or request analysis to be rerun due to poor precision and/or accuracy results ? |

**Reporting Procedures**

- | Yes                      | No                       | N/A                                 |   |
|--------------------------|--------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | If the permittee is a Categorical IU, does it submit Baseline Monitoring Reports, reports on compliance with categorical pretreatment standard deadline, and periodic reports on continued compliance within the time frames specified in 40 CFR 403.12 ? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | If the permittee is discharging hazardous wastes as defined in 40 CFR 261, do they notify the POTW, the EPA Regional Waste Management Division and State Director, hazardous waste authorities in writing of such discharge ?                             |

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- Does the permittee submit reports by deadlines specified in its permit or by deadlines specified by an enforcement action ?
- If monitoring and analysis are performed more frequently than required by permit, are the results of additional analysis reported in permittees' self-monitoring report ?
- Does the permittee notify the Control Authority within 24 hours of becoming aware of a discharge violation ?
- Does the permittee submit results of additional analysis to the Control Authority within 30 days of becoming aware of a discharge violation ?
- Does the permittee notify the Control Authority ***in advance*** of any substantial change in the volume or nature of pollutants in their discharge ?

**Reporting Procedures**

Yes    No    N/A

- Does the permittee immediately notify the Control Authority in the event of an accidental discharge or the discharge of a slug load ?
- Does the permittee, within 5 days after an accidental discharge or slug load, submit to the Control Authority a detailed written report describing the nature and cause of the discharge and the measures to be taken to prevent similar future occurrences ?
- If the permittee knows in advance of the need for a bypass of treatment equipment, does it submit prior notice to the Control Authority at least 10 days before the date of the anticipated bypass ?
- Does the permittee notify the Control Authority within 24 hours following an unanticipated bypass ?

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Part 5. Results of Sampling and Analysis YTD

Wal-Mart TMG

Monitoring Report

Yearly Summary Sheet

| Parameter                   | Minimum        | Average | Maximum        |
|-----------------------------|----------------|---------|----------------|
| Total Phosphorus (mg/l)     | 2.1            | 4.3     | 6.4            |
| Total Phosphorus (lbs./day) | 0.2            | 0.5     | 0.8            |
| Total Copper (mg/l)         | 0.018          | 0.034   | 0.072          |
| Total Copper (lbs./day)     | 0.002          | 0.004   | 0.011          |
| Total Zinc (mg/l)           | 0.251          | 0.547   | 1.260          |
| Total Zinc (lbs./day)       | 0.027          | 0.062   | 0.186          |
| Oil and Grease (mg/l)       | 11.000         | 66.1    | 360.0          |
| pH (Std. Units)             | 5.40           |         | 99.20          |
| Wastewater Flow (MGD)       | <b>0.00880</b> | 0.01359 | <b>0.01770</b> |

|                                      |    |
|--------------------------------------|----|
| Number of sampling visits            | 10 |
| Number of Inspections Conducted      | 0  |
| Number of NOV's Issued               | 2  |
| Number of AO's Issued                | 0  |
| Is IU in Significant Noncompliance ? | No |

Part 6. Inspection Findings and Required Corrective Actions

**Inspection findings :** This facility is clean, well-organized and environmentally responsible.

**Required Corrective Actions:** Have the process water meter certified and calibrated by professionals within 30 days of inspection (11/09/2012).

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Inspection report completed \_\_\_\_\_

By \_\_\_\_\_ *orig. signed*  
Nancy Busen  
City of Bentonville, Lab Pretreatment Supervisor  
1901 N. E. "A" Street  
Bentonville, AR 72712  
479-271-3160

*A-1j*

City of Bentonville  
Wastewater Utilities  
Pretreatment Division  
1901 N.E. "A" Street  
Bentonville, AR 72712  
479-271-3160  
FAX: 479-271-3163



**Grease Waste Hauler Permit  
BWH # 2012-00**

effective on January 1, 2013  
expires on December 31, 2013

**Permit Application Renewal Date  
October 1, 2013**

**August 20, 2013**

In accordance with the provisions of City of Bentonville Ordinance # 2012-65:

is authorized by this permit to collect, pump or haul waste kitchen grease generated by food services located within the City of Bentonville in accordance with ordinance # 2012-65 and the conditions contained in this permit.

Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards, or requirements under Federal, State or local laws, including any such regulations, standards, requirements or laws that may become effective during the term of this permit.

The permittee shall comply with all conditions of this permit. Noncompliance with any item or condition of the permit constitutes a violation of ordinance # 2012-65 and is subject to administrative, civil and criminal penalties described therein.

This permit is not transferable without prior notification and approval from the City. The original copy of this permit shall be maintained at the above listed address. Additional copies of this permit may be obtained by contacting the Lab/Pretreatment Supervisor.

If the permittee wishes to continue an activity regulated by this permit after the permit expires, the permittee shall apply for a new permit at least 90 days before this permit expires. If the permittee has met the above stated application deadline and/or if the failure to reissue the permit is not due to any act or failure to act on the part of the permittee, the expired permit is effective and enforceable until the permit is reissued.

Issued by \_\_\_\_\_  
Pretreatment Supervisor, City of Bentonville

this \_\_\_\_\_ day of \_\_\_\_\_ 2012

**Section 1 - Permit Required**

- (a) It shall be unlawful for any person to pick up and transport liquid waste generated within the City of Bentonville to any wastewater treatment plant or disposal facility without first obtaining a waste hauler permit from the City of Bentonville Control Authority. The permit shall designate the liquid waste authorized for transportation in each vehicle.
- (b) A person who desires a permit must make application on a form provided by the Control Authority.
- (c) A person who desires a permit must submit with his application a photocopy of the transporter's driver's license. A permittee shall notify the Control Authority of employment changes during the permit period and shall provide the Control Authority a copy of the new transporter's driver's license.
- (d) The Control Authority shall not issue a permit without a certificate of inspection for each vehicle from the ADH. The inspection must verify that each vehicle is in compliance with the provisions of this ordinance.
- (e) The permit is not transferable.

## **Section 2. Insurance - Required**

As a prerequisite to the issuance of any permit required by this article that the permittee shall file with the Control Authority, and shall thereafter keep in full force and effect at all times (1) a policy of comprehensive general liability insurance, with a company authorized to do business in the state of Arkansas, in minimum amounts of one-hundred thousand dollars (\$100,000.00) per occurrence for bodily injury, and fifty-thousand dollars (\$50,000.00) per occurrence for property damage, and (2) a policy of automobile liability insurance, covering the operation of each vehicle used in such business, in minimum amounts of one-hundred thousand dollars (\$100,000.00) per person for bodily injury , three-hundred thousand dollars (\$300,000.00) per occurrence for bodily injury, and fifty-thousand dollars (\$50,000.00) per occurrence for property damage. The City shall be named as an additional insured in all insurance policies required by this article. Each insurance policy shall require notice from the insured and/or insurer to the Industrial Monitor at least thirty (30) days prior to cancellation by the insurer or the insured.

## **Section 3. Fee and Display of Permit**

- (a) Each permittee shall pay a permit fee specified by the Control Authority. An additional fee, specified by the Control Authority, will be charged for each permitted vehicle. Each permit must be renewed annually, at least 90 days before the permit expiration date for the current year.
- (b) The Control Authority shall number permits consecutively. Each permit holder shall display on both sides of each vehicle (in a color contrasting with the background; (using letters a minimum of three inches in height) the ADH license number, and the following:  
**BVL (City permit No.)**

The permit holder shall place business name, ADH license number, and the vehicle permit number on each vehicle. The permit holder shall keep the permit receipt, or a copy, in the vehicle at all times.

#### **Section 4. Liquid Waste Vehicles: Maintenance**

- (a) A liquid waste transporter shall:
  - (1) Maintain tanks, pumps, valve hoses, racks, cylinders, diaphragms, pipes, connections, and other appurtenances on a vehicle in good repair and free from leaks;
  - (2) Provide a safety plug or cap for each valve of a tank; and
  - (3) Cause the vehicle exterior to be clean and the vehicle odor-free at the beginning of each work day.
- (b) The Control Authority may cause any vehicle operated in violation of this article to be impounded or immobilized until the violation is corrected. The Control Authority may also revoke the permit for an improperly operated vehicle.

#### **Section 5. Liquid Waste Vehicles: Inspection**

- (a) To qualify for a permit, a vehicle must comply with the following requirements:
  - (1) The sample tank shall be an integral part of a vehicle to transport liquid waste; portable tanks or other containers temporarily installed in vehicles are prohibited;
  - (2) Piping, valves, and connectors shall be securely attached to tank and/or vehicle;
  - (3) Truck tank must be liquid tight;
  - (4) Truck tanks to be constructed so that every interior and exterior portion can be easily cleaned;
  - (5) Piping, valves, and connectors shall be accessible and easy to clean;
  - (6) Opening of a tank to be constructed so that collected waste will not spill during filling, transfer or during transport;
  - (7) Outlet connections to be constructed so that no liquid waste will leak, run, or spill out from the vehicle;
  - (8) Outlets to be of a design and type suitable for the liquid waste handled and capable of controlling flow or discharge without spillage and undue spray on or flooding of immediate surroundings while in use; and
  - (9) Pumps, and valves, cylinders, diaphragms, and other appurtenances to be of a design and type suitable for the type of waste handled, capable of operation

without spillage, spray, or leakage, and capable of being easily disassembled for cleaning.

## Section 6. Responsibilities of Liquid Waste Transporter

- (a) Before accepting a load of liquid waste for transportation, a liquid waste transporter shall determine (1) the nature of the material to be transported, and (2) that his equipment is sufficient to properly handle the job without spillage, leaks, or release of toxic or harmful gases, fumes, liquids, or other substances. Upon delivery of the waste to the disposer, the transporter shall inform the disposer of the nature of the waste.
- (b) A transporter with a City of Bentonville liquid waste transporter permit shall not transport hazardous materials, in vehicles permitted by the City for transporting liquid waste.
- (c) A transporter holding a City of Bentonville permit must use a disposal site permitted and approved by the Arkansas Department of Environmental Quality (if land applied) or the environmental control authority in any adjoining state.
- (d) The following described manifest system, consisting of a multi-part manifest ticket, shall be used to document the generation, transportation, and disposal of all applicable liquid waste generated in the City of Bentonville, shall be used:
  - (1) Manifest books shall be purchased by the transporter from the City of Bentonville, for an established fee;
  - (2) A transporter shall complete one manifest for each location serviced, with the exception of chemical/portable toilet companies servicing their own units. Chemicals of portable toilet companies servicing their own units shall be exempt from trip ticket requirements but shall be required to submit a monthly total of volumes disposed and the location of disposal to the Control Authority;
  - (3) A copy of the grease trap manifest shall be signed by the generator/ responsible party or manager and the transporter at the time of waste collection; a copy thereof shall be maintained by the generator for a period of three (3) years
  - (4) A copy of the manifest shall be signed by the transporter and disposer at the time of disposal and; a copy thereof shall be maintained by the disposer
  - (5) A copy of the manifest shall be maintained by the transporter and; a completed copy of each manifest generated in the city shall be presented on the first of each month to the Control Authority
  - (6) A copy of all completed manifests shall be maintained by the Control Authority for a period of three (3) years.
  - (7) All pertinent sections of the manifest must be completed prior to signing.
  - (9) Liquid waste haulers of *septic waste only* may note on the manifest if the generator is not available to sign the document provided all other information for the generator including the phone number is listed; a responsible

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party for grease interceptor generators must be onsite to observe interceptor cleaning.

- (e) Submit with this application a photocopy of the transporter's driver's license. A permittee shall notify the Control Authority of employment changes during the permit period and shall provide the Control Authority a copy of the new transporter's driver's license.

### **Section 7. Accumulation of Liquid Waste**

It shall be unlawful for any person to allow liquid waste that emits noxious or offensive odors or is unsanitary or injurious to public health to accumulate upon property under his control.

### **Section 8. Disposal of Liquid Waste**

- a. It is unlawful for any person to unload or offer for sale or exchange liquid waste anywhere except at a place permitted by the City, the State, or the Federal government.
- b. It is unlawful for any person to deposit or discharge liquid waste onto a street or into a storm or sanitary sewer or an area that drains into the storm sewer system.

### **Section 9. Responsibilities of Liquid Waste Generator**

A generator of liquid wastes shall not have hazardous wastes or liquid waste in combination with hazardous waste removed from his premises by a liquid waste transporter operating under a City permit.

- a. It shall be the responsibility of the grease generator to assure the manifests are complete, accurate and include;
  - Business name
  - Business address
  - Telephone number
  - Waste capacity of the interceptor
  - Date of delivery to transporter
  - Name and signature of the FSE manager or owner
- b. The generator shall ensure that all water, floating grease, and sludge is removed from the interceptor
- c. The generator shall use only waste haulers permitted by the city
- d. Report spills, and accidents involving collection device to the proper local authorities within 24 hours;
- e. Clean up spills and accidents immediately and have all waste material disposed of by a permitted waste hauler.

### **Section 10. Responsibilities of Liquid Waste Disposers**

*A-2 e*

- (a) It shall be unlawful for a liquid waste disposer to allow accumulation of liquid waste on his premises so that rainfall could carry the material to storm sewers or create a noxious odor or health hazard.
- (b) A liquid waste disposer shall:
  - (1) Obtain and maintain compliance with all licenses and/or permits required by local, state, or federal law;
  - (2) Accept waste only from permitted transporters;
  - (3) Maintain trip ticket copies for a period of two years;
  - (4) Accept only those classes of waste authorized by ordinance or permit; and
  - (5) Make available all records required to be kept for inspection by the Control Authority during normal business hours.

### **Section 11. Rules and Regulations**

The Control Authority may promulgate rules and regulations necessary to carry out the provisions of this article and to protect the public from health and safety hazards. The Control Authority may amend any permit issued hereunder to ensure compliance with applicable laws and regulations.

### **Section 12. Denial, Suspension, and Revocation of Permit**

- (a) The Control Authority may deny a permit if it is determined that an applicant is not qualified under Article II of this ordinance and may suspend or revoke a permit if it is determined that a permittee:
  - (1) Has violated a provision of this permit or Ordinance 2012-65;
  - (2) Has failed to pay a required fee;
  - (3) Has failed to comply with maintenance or inspection requirements; or
  - (4) Has failed to deliver completed manifests to the Control Authority.
  - (5) Has failed to deliver hauled waste to a destination in accordance with all local, state and federal regulations.
  - (6) Falsifying manifest records;
- (b) After suspension under this section, a permittee may file a request for reinstatement of the permit. When the Control Authority determines that the permittee is again qualified, all violations have been corrected, precautions have been taken to prevent future violations, and all required fees have been paid, the permit may be reinstated at the option of the Control Authority.

- (c) The Control Authority may revoke for a period of one year or less all permits held by a liquid waste transporter if the transporter or an employee of the transporter violated any of the provisions of this article, any rule or regulation promulgated by the Control Authority, or any applicable City ordinance or State law.
- (d) It shall be unlawful for a permittee whose permit is suspended or revoked to collect, transport, or dispose of any waste materials within the jurisdiction of the Control Authority.

### **Section 13. Penalties**

- (a) Any person, operator, or owner who shall violate any provision of this article, or who shall fail to comply with any provision hereof, shall be guilty of a misdemeanor and, upon conviction, shall be subject to a fine of not more than one thousand dollars (\$1000.00) or double that sum for each repetition of such offense. Each violation and each day a violation continues shall constitute a separate offense.
- (b) Any person found guilty of violating any provision of this article shall be liable to the City for any expense, loss, fines or damage occasioned by the City for proper clean-up and proper disposal of said waste materials.

### **Section 14. Permit Modification**

This permit may be modified for good causes including, but not limited to, the following:

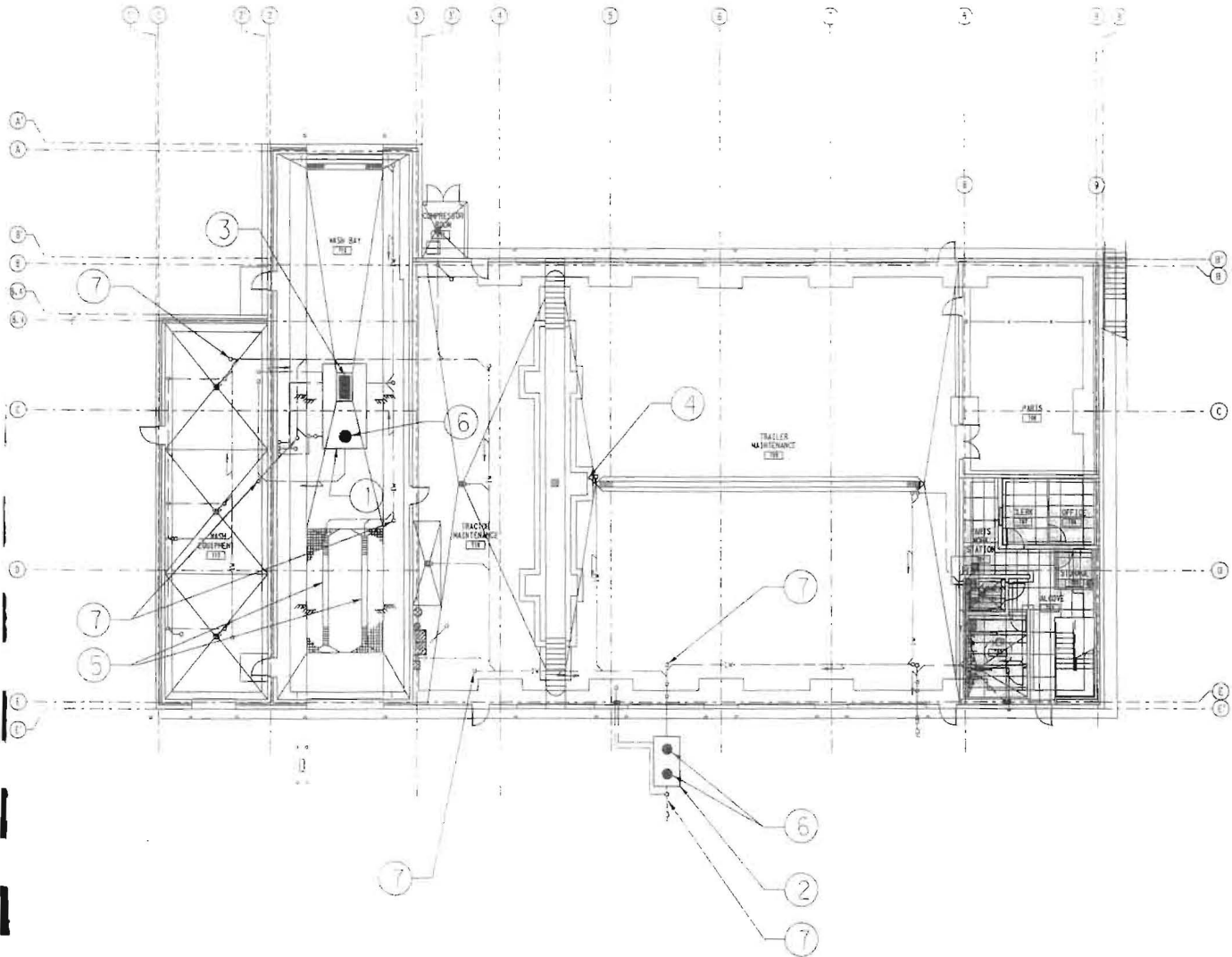
1. To incorporate any new or revised Federal, State or local pretreatment standards or requirements;
2. Material or substantial alterations or additions to the discharger's operation, or discharge volume or character which were not considered in drafting the effective permit;
3. A change in any condition in either the discharger or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
4. Information indicating that the permitted discharge poses a threat to the Control Authority's collection and treatment systems, POTW personnel, or the receiving waters;
5. Violation of any terms or conditions of the permit;
6. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;

### **Section 15. Continuation of Expired Permits**

An expired permit will continue to be effective and enforceable until the permit is reissued if:

1. The permittee has submitted a complete permit application at least ninety (90) days prior to the expiration date of the user's existing permit;
2. The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the permittee.

Attachment A-3



Walmart

**TMG PLAN**

NOT TO SCALE

TMG NOTES BY SYMBOL:

- ① SAND/OIL TRAP No. 1
- ② SAND/OIL TRAP No. 2
- ③ CATCH BASIN
- ④ WASTE OIL INLET No. 4
- ⑤ FLYWHEEL WASH PIT No. 5
- ⑥ CAST IRON MANHOLE COVER
- ⑦ 4" CLEANOUT

TITLE: TMG PLAN

DATE:

SCALE: NPS

REF. DWG. NO. P2.11

CB: 981699

SUPPLEMENTAL DWG. NO.

OMTMG