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NPDES PERMIT FILE

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AE December 5, 2006
Adequate response

Mr. Allen Gilliam
ADEQ State Pretreatment Coordinator
P. O. Box 8913
Little Rock, AR 72219-8913

Dear Mr. Gilliam;

Please find enclosed the reply to the Pretreatment Inspection Audit report received November 1, 2006 concerning the inspection conducted June 20 – 22, 2006.

If you find any response insufficient or have any questions, please contact this office.

A.) Introduction

Page # 3. FYI:

Design Flow for the Bentonville POTW is 5 MGD but the permit is 4 MGD.

804 dry tons of biosolids are composted and sold to the public not given away.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

OK 1.) Under 40 CFR 403.8(f)(2), "The POTW shall implement procedures to (i) identify and locate all possible industrial users which might be subject to the pretreatment program."

Specific Questionnaires, including Pollution Prevention questions, for Bentonville Medical facilities of all types including Veterinarians were mailed in August 2006. More site specific questionnaires will be prepared and mailed to other facilities on the list received from Mr. Gilliam in the near future.

One reply from a Veterinarian did "discharge to septic system" and will be kept for future use by ADEQ's State permitting branch.

OK 2.) All IU's are notified in the language of their permits of 40 CFR 403.8 (f)(2)(i)(iii) and RCRA requirements.

All current Industrial Users were notified of the Streamlining Rule and were prepared with additional responses during the yearly Compliance Inspection.

3.) Notification of 40 CFR 403.12(p) "The industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW which, if otherwise disposed of, would be a hazardous waste under 40 CFR 261..... will be accomplished by adding an amendment to the current IU's permit. All other probables on the list will be notified by mail within the first 8 months of 2007.

4.) Under 40 CFR 403.12(l) "Signatory requirements for industrial user reports."

All IU's report forms were modified beginning June 1, 2006 with language directly from 40 CFR 403.6(a)(2)(ii)

5.) Under CFR 403.8(f)(l)(v) "Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by Industrial Users compliance with applicable Pretreatment Standards and Requirements by Industrial Users."

The city's inspection report indicated that Kennametal was not a hazardous waste generator, while the facilities permit application and ADEQ's hazardous waste list DID show them to be a conditionally exempt generator.

An extra question will be added to next years inspection report form inquiring if the industry is conditionally exempt to avoid confusion. A copy of Kennametal's 1998 conditionally exempt status is attached.

6.) Under the current 40 CFR 403.8(f)(2)(vi) Evaluate whether each SIU needs a plan or other actions to control slug discharges.

A letter concerning the new "Streamling Rule" changes was mailed to each SIU prior to their Compliance Inspections this October. All industries readily complied. Kraft, Kennametal, and Fujicolor are all compliant with (A), (B), (C), & (D) in the recommendations set forth in this audit inspection report and the "Streamling Rule" as well. Wal*Mart TMG opted to seal the floor drains in the area affected by a potential accidental slug load.

7.) Paragraph in Kennametal's permit listing obsolete Metal Products and Machinery Rule is deleted.

Recommendations

1.) SIU's will be sent a copy of 40 CFR 403.12

2.) P2, BMP's, and source reduction Have been added to the compliance inspection reports and were used in the 2006 inspections.

3.) Reduction of water usage and amount of controlled waste are compared with each compliance inspection.

what about hospitals, DDS, pharmacies, etc?

OK

OK

OK

OK

OK

OK

OK

ok 4.) All Compliance inspection reports were updated before the 2006 inspections to comply with suggestions made during the 2006 audit by Mr. Gilliam. The audit inspections are all saved on the computer so that any further suggestions can be added with ease.

ok 5.) Sampling SOP's are currently in place but will be updated further during 2007 to include trouble shooting and items deemed helpful added by current technicians.

ok 6.) MAHL's will be updated in 2007 including surcharges implemented for Total Phosphorous.

ok 7.) "Municipal Pollution Prevention for Pretreatment Programs" will be reviewed by wastewater pretreatment and management and sent to City Council members if deemed prudent by the wastewater manager.

ok 8.) P2 is integrated into the new audit inspection report forms. The ERP will be updated to include additional P2 information.

ok 9.) Nickel and Chrome will be included in some Wal*Mart TMG's analysis in 2007 for background information.

ok 10.) Will discuss Industry/Business Awareness Day with upper management. If approved, implementation may have to be held for the next budget year.

ok 11.) The Laboratory Staff is currently studying and preparing a presentation on Clean Sampling Technique for the January District Meeting in Bentonville. This will hone their routine sampling skills and prepare them for Clean Sampling in the future as well as share the information with others in the NW District.

ok D) *All 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, including streamlining revisions are completed.*

Site specific surveys will be prepared & sent to all state listed hazardous waste generators in 2007.



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