ARKANSAS
ENERGY & ENVIRONMENT

September 12, 2024

Steve Mallett, General Manager
Russellville City Corporation
P.O. Box 3186
Russellville, AR 72811
Email Address: smallett@citycorporation.com

RE: City Corp WWTP Pretreatment Compliance Inspection – PDS# 131594 (Pope Co.)
AFIN: 58-00105 Permit No.: AR0021768

Dear Mr. Mallett:

On August 6, 2024, I performed a Pretreatment Compliance Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

No violations were noted at the time of the inspection. Please refer to the inspection report for any comments. If I can be of any assistance, please contact me at amy.huneycutt@arkansas.gov or (501) 837-2082.

Sincerely,

Amy Huneycutt

Amy Huneycutt
Inspector Supervisor, Office of Water Quality

CC: Greg Kremers, gkremers@citycorporation.com ; Michael B. Hall, mhall@citycorporation.com

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **58-00105**	PERMIT #: **AR0021768**	DATE: **8/6/2024**
COUNTY: **58 Pope**	PDS #: **131594**	MEDIA: **WN**
GPS LAT: **35.248343** LONG: **-93.114391** LOCATION: **General Area**		

FACILITY INFORMATION

NAME: **City Corp WWTP**
LOCATION: **404 Jimmy Lile Road**
CITY: **Russellville**

RESPONSIBLE OFFICIAL

NAME / TITLE: **Steve Mallett / General Manager**
COMPANY: **City Corp**
MAILING ADDRESS: **P.O. Box 3186**
CITY, STATE, ZIP: **Russellville AR 72811**
PHONE & EXT: / FAX: **479-968-2080 /**
EMAIL: **smallett@citycorporation.com**
CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**
INSPECTOR ID#: **36537 S - State**
FACILITY EVALUATION RATING: **4 - Satisfactory**
INSPECTION TYPE: **Pretreatment Compliance**
DATE(S): **8/6/2024** ENTRY TIME: **09:00** EXIT TIME: **14:30**
PERMIT EFFECTIVE DATE: **8/1/2023**
PERMIT EXPIRATION DATE: **7/31/2028**
FAYETTEVILLE SHALE RELATED: *******
FAYETTEVILLE SHALE VIOLATIONS: *******

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Michael B. Hall, City Corp Pretreatment Coordinator, mhall@citycorporation.com; Greg Kremers, City Corp WW & Pretreatment Operations Director, gkremers@citycorporation.com; Gracie Morrison, OWQ Water Quality Specialist

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
S	OTHER: **Pretreatment**				

SUMMARY OF FINDINGS

No violation was observed at the time of the inspection.

GENERAL COMMENTS

On August 6, 2024, I performed a Pretreatment Compliance Inspection (PCI) with the participants listed above. The inspection consisted of a program evaluation, records review, and two industrial user visits. City Corp's pretreatment program continues to evaluate and control industrial users to protect the POTW as required by the program. There were no new industrial users added to the program since the last PCI on September 24, 2020. In August 2023, City Corp submitted an evaluation for technically based local limits (TBLL). This evaluation concluded TBLL are not currently required.

Two permits were reviewed for this inspection, Conagra and Aqua Contour Cutting. These permits contained all required and recommended control elements. Mr. Hall informed us all permits are written to include these elements. Sampling and inspections are conducted as required by the pretreatment program.

During this inspection we visited Conagra (PDS# 131730) and Mahle (PDS# 131731). No issue were observed at these industrial users. The industrial users are familiar with their permits and the pretreatment requirements.

INSPECTOR'S SIGNATURE: Amy Huneycutt **Amy Huneycutt**	DATE: **8/27/2024**
SUPERVISOR'S SIGNATURE: Jason R Bolenbaugh **Jason Bolenbaugh**	DATE: **9/12/2024**

DIVISION OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: **Russellville City Corporation**
AFIN Number: **58-00105**
NPDES Permit Number(s): **AR0021768, ARG640036, ARR000104**
Program Tracked under NPDES Permit Number: **AR0021768**
Fact Sheet Preparation Date:
Date of Last PCI/Audit: **9/24/2020**
Date of Last Annual Report: **February 2024**
Name of Inspector: **Amy Huneycutt**
Date PCI Performed: **August 6, 2024**
Name and Title of Facility Representative: **Michael B. Hall**
Name and Title of Other Participants: **Gracie Morrison**
Number of IUs Visited: **2**
Name(s) of IUs Visited: **Conagra and Mahle**
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED
NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. **No change**

2. Has ADEQ or EPA been notified of these changes? **N/A**

3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes

4. What procedures are being used to update the IU Survey? **IU survey is sent to industrial users at permit renewal and all new industrial users.**

5. Total number of Significant Industrial Users, according to the definition used by the POTW (This number must be greater than or equal to the answer to question 6): **15**

6. Number of Categorical Industrial Users: **4**

7. How does the POTW determine the appropriate categorical standards to apply to an IU? **Based on 40 CFR 403**

8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (i.e. Metal Finishing), and the regulated process (i.e. phosphating, zinc plating, etc.). Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Aqua Contour Cutting, Inc.	**Metal finishing**	**Zirconization**
Grace Manufacturing, Inc.	**Metal finishing**	**Phosphatizing rinse**
P.O.M., Inc.	**Metal finishing**	**Phosphatizing rinse**
Taber Extrusions, LLC	**Aluminum forming**	**Contact cooling and quench**

B. LOCAL LIMITS

1.IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? No, the POTW has determined local limits are not necessary at this time.

2. Describe any apparent problems with the local limits. **N/A**

3. How often are pollutant scans of POTW influent and effluent performed by the POTW? Does this fulfill the requirements of the approved program and the NPDES permit? **Yes**

Pollutant:	**Sampling Frequency**	**Permit Requirement**	**Program Requirement**
Metals:			
Influent:	**1/quarter**	**1/quarter**	**1/quarter**
Effluent:	**1/quarter**	**1/quarter**	**1/quarter**
Organics:			
Influent:	**1/quarter**	**1/year**	**1/year**
Effluent:	**1/quarter**	**1/year**	**1/year**

Comments: **See permit requirements-part II, 7. C. of the permit**

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
Yes, earlier this year a slug load of COD entered the POTW. Pretreatment staff contacted suspected the IU and found Tyson Tyler Road lost SCADA causing a pump to continue running. The facility corrected the sSCADA problem. The slug load did not cause any issue with the treatment works. No enforcement action was required.

C. INDUSTRIAL USER CONTROL MECHANISM
1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? **Permit**
2. How many IU permits (or other control documents) have been issued? **All 15**
3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT. **Yes, all SIUs have current permits. Conagra and ACC permits reviewed for this section.**
4. Does the control document contain the following items? List the section of the permit each item is listed under.
An expiration date: **Yes -cover page**
Discharge limitations: **Yes – Part 1, Sec. C**
If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under.
IU self-monitoring requirements: **Yes – Part 2**
IU reporting requirements: **Yes – Part 3**
5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under.
Sample location: **Part 2, A.**
Type of sample: **Part 2, B.**
Monitoring frequency: **Part 2, B.**
Bypass prohibition: **Part 4, G.**
Right of entry: **Part 4, C**
Non-transferability: **Part 4, H**
Revocation clause: **Part 4, J**
Penalty Provisions: **Part 4, K**
Slug load notification: **Part 3, E.**
Notification of process change: **Part 3, D.**

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below.

	Current frequency:	Program Requirements:
Sampling:		
Categorical IUs	**3/Year**	**3/Year**
Other SIUs	**3 +/Year**	**3/Year**
Non-SIUs	**N/A**	**N/A**
Inspection:		
Categorical IUs	**1/Year**	**1/Year**
Other SIUs	**1/Year**	**1/Year**
Non-SIUs	**N/A**	**N/A**

Comments: **POTW does not monitor non-SIU.**

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes

3. Are inspections announced or unannounced? **Both**

4. Are records kept of each inspection? **Yes**

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: **Yes**

Officials present: **Yes**

Inspection of chemical storage areas: **Yes**

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: **Yes**

Inspection of the pretreatment facilities: **Yes**

Review of self-monitoring records: **Yes – Contract lab EEG**

Observation of IU self-monitoring procedures: **No**

Verification that approved analytical techniques are used: **Yes**

Verification of IU flow measurement (where required): **Yes**

6. Please describe the overall adequacy of inspection documentation: **The inspection form is adequate but includes extra information. Mr. Hall mentioned creating a new form. The review reveals no inspection form was documented for the Conagra inspection. Inspections should always be documented for future reference.**

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY). Yes, samples are conducted annually.

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? **Yes – Contract lab is certified.**

9. Are sampling and flow monitoring equipment properly

maintained? **Yes, sample bottles cleaned after each use. Each IU has unique sample tube, and pH meter calibrated prior to each use.**

10. Is the POTW keeping proper field notes and chain of custody forms? **Yes**

11. Is the sampling location representative of the discharge to the collection system? **Yes**

12. Are sampling locations identified in POTW records? **Yes**

13. Are sampling services available in an emergency? **Yes**

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? **IU reports are emailed to the POTW monthly. Results are transferred to database and spreadsheet.**

15. **ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes, verified upon receipt.**

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes

17. What are the POTW's procedures for following up violations? **Issue NOV and require CAP**

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? NA – no new Categorical IU

19. Additional comments on the POTW's inspection and sampling procedures: **Inspection and sampling of the IU appear to be meeting requirements of 40 CFR 403.12. Mr. Hall should be sure to document all inspections.**

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes

2. How does the POTW respond to the following violations?

Effluent limitations: **NOV with CAP**

Late reports: **NOV**

Unpermitted discharges: **NOV with application-then Administrative Order with fine-then Civil/Criminal action**

Slug loads or spills: **IU notification if problem at POTW, NOV with CAP**

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:		Type of Violation:		Enforcement Action:		Compliance Deadline:
PPP		**NH3-N chronic**		**Administrative Order**		**12/31/23**
Taber Extrusion		**O&G**		**NOV & CAP**		**NA-in compliance**

5. Comments on the POTW's enforcement procedures: **PPP is currently in compliance but has not implemented their entire corrective action plan. PPP may still be required to add alkalinity for NH3-N control.**

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE
1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes**
2. Are staffing levels adequate? **Yes**
3. Are the responsible officials familiar with the approved program? **Yes**

G. MULTIJURISDICTIONAL ISSUES
1. List any IUs which are located outside of the jurisdictional area of the POTW: **N/A**
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **N/A**
3. Does the POTW have copies of permits for IUs in other cities? **N/A**
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? **N/A**
5. Comments on multijurisdictional issues: **The POTW does have a satellite system, the city of Dover. Currently there are no industrial wastewater contributors from the satellite system. City Corp should ensure now there are control measures in place should an IU move to Dover in the future.**

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: Conagra
POTW Name: Russellville City Corporation
Industry Contacts: Thomas Jones, Matt Fleetwood
Date and Time of Visit: 8/6/2024 at 12:50 pm
Description of Manufacturing Process: Produce frozen meals, bagged meals, cook chicken, noodles, and sauces.
Sources of Process Wastewater: Dewatering chicken, sanitation
Categorical Industry? No
Basis for Limits: 40 CFR Effluent Limit Guidelines
Point of Application: Effluent
Description of Pretreatment Equipment and Procedures: Bar and rotor screens, Equilization basin 1 with pH adjustment, DAF1, Equilization basin 2 add polymer, coagulate and caustic, flocculation tank, DAF2, discharge to collection system.
Spill Prevention and Solvent Management Procedures: Spill kits available throughout plant.
Sampling Location and Equipment: Composite sampler

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: Mahle
POTW Name: Russellville City Corporation
Industry Contacts: Bruce Phillips
Date and Time of Visit: 8/6/2024 at 14:00
Description of Manufacturing Process: Milling, heat treatment, grinding, polishing, Sodium Hydroxide quench
Sources of Process Wastewater: Quench
Categorical Industry? No
Basis for Limits: 40 CFR Effluent Limit Guidelines
Point of Application: Effluent
Description of Pretreatment Equipment and Procedures: pH adjustment using acetic acid and contact chamber. Facility has 700 gallon acetic acid tank and in-ground concrete tank with baffles for contact time.
Spill Prevention and Solvent Management Procedures: Spill kits
Sampling Location and Equipment: NA, samples are pulled by POTW or contract lab.

PPETS CODE SHEET
PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	**Amy Huneycutt**	
NAME OF FACILITY:	**Russellville City Corp.**	
PERMIT NUMBER USED TO TRACK PROGRAM:	**AR0021768**	NPID
DATE OF PCI:	**8/6/2024**	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	**15**	SIUS
NUMBER OF CATEGORICAL IUS:	**4**	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	**0**	NOIN
SIUS WITHOUT CONTROL MECHANISM:	**0**	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	**2**	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	**0**	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	**0**	SNIN

Office of Water Quality Photographic Evidence Sheet					
Location:	**City Corp WWTP**				
Photographer:	**Amy Huneycutt**	Date:	**August 6, 2024**	Time:	**1007**
Witness:	**Gracie Morrison**			Photo #:	**1**
Description:	**City Corp auto-sampler for pretreatment IU monitoring.**				

Photographer:	**Amy Huneycutt**	Date:	**August 6, 2024**	Time:	**1007**
Witness:	**Gracie Morrison**			Photo #:	**2**
Description:	**Hose for each IU.**