

ADEQ

ARKANSAS
Department of Environmental Quality

May 9, 2008

Ms. Thea Hughes, General Manager
Jacksonville Wastewater Utility
248 Cloverdale Road
Jacksonville, AR 72076

AFIN: 60-00543,

NPDES Permit No: AR0041335

Dear Ms. Hughes:

On May 7 and 8, 2008, Jill Glenn and I performed a routine compliance inspection of the City of Jacksonville's Industrial Pretreatment Program in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. The inspection revealed you are in compliance with the requirements of your permit and approved Pretreatment Program.:

If I can be any assistance, please contact me at benson@adeq.state.ar.us or 501-683-0827.

Sincerely,



Dennis Benson
District 9 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R 0 0 4 1 3 3 5 11 12 0 8 0 5 0 7 17 18 P 19 S 20 1					
Remarks					
A F I N 6 0 - 0 0 5 4 3 P U L A S K I C O U N T Y					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N	72 N	73 	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Jacksonville Wastewater Utility- Johnson Plant - 248 Cloverdale Road in Jacksonville, AR	Entry Time/Date 1:00 pm / 05/07/08 9:00 am / 05/08/08	Permit Effective Date 11/01/2007
	Exit Time/Date 3:15 pm / 05/07/08 2:30 pm / 05/08/05	Permit Expiration Date 10/31/2012
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jon Boyles, Pretreatment Coordinator, 501-982-0581	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Thea Hughes, General Manger 248 Cloverdale Road Jacksonville, AR 72076 501-982-0581	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
S	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	S	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

No violations were noted.

Name(s) and Signature(s) of Inspector(s) Dennis Benson	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality- (501) 683-0827/(501) 682-0910 (Fax)	Date 05/08/09
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: **Jacksonville**

AFIN Number: **60-00543**

NPDES Permit Number(s): **AR0041335 and ARR000254 (no exposure)**

Program Tracked under NPDES Permit Number: **AR0041335**

Fact Sheet Preparation Date: _____

Date of Last PCI/Audit: **03/19-22/07**

Date of Last Annual Report: **02/20/07**

Name of Inspector: **Dennis Benson, Jill Glenn**

Date PCI Performed: **05/07-08/08**

Name, Title, and Telephone Number of Facility Representative:
 Jon Boyles, Pretreatment Coordinator

Name and Title of Other Participants: _____

 Sam Zethaban, Operations Manager,

 Curtis Allen, Pretreatment Inspector

Number of IUs Visited: **2**

Name(s) of IUs Visited: **Ashland Chemical, Altivity**

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.

Form approved July 1989

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. CECA has closed.

2. Has ADEQ or EPA been notified of these changes? Yes

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

4. What procedures are being used to update the IU Survey?
All new businesses in Jacksonville must get Privilege License
To obtain a Privilege License must get check off from Utility
Also, annual review of Chamber of Commerce report

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) 13

6. Number of Categorical Industrial Users: 1 (Ashland Chemical which does not discharge any process water.

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Check CFR and cross check against local limits

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

Name of IU:	Category:	Regulated Process:
<u>Ashland Chemical</u>	<u>40 CFR 414</u>	<u>(domestic only)</u>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? yes

2. Describe any apparent problems with the local limits.
None

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>4/yr</u>	<u>4/yr</u>	<u>4/yr</u>	<u></u>
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>4/yr</u>	<u></u>
Sludge:	<u>4/yr</u>	<u>4/yr</u>	<u>4/yr</u>	<u></u>
Organics:				
Influent:	<u>1/yr</u>	<u>1/yr</u>	<u>1/yr</u>	<u></u>
Effluent:	<u>1/yr</u>	<u>1/yr</u>	<u>1/yr</u>	<u></u>
Sludge:	<u>1/yr</u>	<u>1/yr</u>	<u>1/yr</u>	<u></u>

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? **NO**

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? 13
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
-
4. Does the control document contain the following items?
- An expiration date: yes
- Discharge limitations: yes
- If the program requires self-monitoring by the IUs, do the Permits contain:
- IU self-monitoring requirements: yes
- IU reporting requirements: yes
5. Indicate which of the following recommended standard conditions are contained in the control documents:
- Sample location: yes
- Type of sample: yes
- Monitoring frequency: yes
- Bypass prohibition: yes, if treatment process is present
- Right of entry: yes
- Nontransferability: yes
- Revocation clause: yes
- Penalty Provisions: yes
- Slug load notification: yes
- Notification of process change: yes

D. MONITORING OF IUS BY POTW

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

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>2/yr</u>	<u>2/yr</u>
other SIUs	<u>2/yr</u>	<u>2/yr</u>
Inspection:		
categorical IUs	<u>1/yr</u>	<u>1/yr</u>
other SIUs	<u>1/yr</u>	<u>1/yr</u>

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

3. Are inspections announced or unannounced? Both, most get one day notice

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: No, time of entry not included

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

Observation of IU self-monitoring procedures: yes

Verification that approved analytical techniques are used: yes

Verification of IU flow measurement (where required): yes

6. Overall adequacy of inspection documentation: Fair, document could use more information on IU treatment equipment and maintenance

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

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? yes

9. Are sampling and flow monitoring equipment properly maintained? yes

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? yes

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

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? yes, range of actions include verbal warnings and NOVs/

17. What are the POTW's procedures for following up violations?
request IU resample and submit narrative of cause and
corrective action.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR
403.12(b)?: yes

Review a Baseline Monitoring Report from the POTW's file,
and indicate which of the following items can be identified
in the BMR:

Name and address: yes

Other environmental permits held: yes

Description of operations: yes

Process flow diagrams: yes

Flow measurements: yes

Measurements of regulated pollutants: yes

Certification of compliance by the IU: yes

Compliance schedule (if needed): n/a

19. Additional comments on the POTW's inspection and sampling
procedures: _____

None

5. Comments on the POTW's enforcement procedures:

none

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, 1.5 FTE

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: LRAFB unincorporated area

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? Yes

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: _____

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Altivity Packaging

POTW Name: Jacksonville

Industry Contacts: Gary Burgess

Date and Time of Visit: 05/08/08 @ 1:05 pm

Description of Manufacturing Process:
Facility makes multiple layer bags for various products.

Sources of Process Wastewater:
Wastewater is generated primarily from clean up of labeling machines (waste ink) and small quantities of starched based glue

Categorical Industry? No

Basis for Limits: local limits

Point of Application: at discharge to POTW

Description of Pretreatment Equipment and Procedures:
Alar system breaks up inks into solid material suitable for disposal in landfill.

Spill Prevention and Solvent Management Procedures: No open drains in the facility.

Sampling Location and Equipment: Samples are collected from a manhole inside paper stock warehouse

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Ashland Specialty Chemical

POTW Name: Jacksonville.

Industry Contacts: John Buzzard, John Ferrell, Wayne Mullins

Date and Time of Visit: 05/08/08 @ 10:45 am

Description of Manufacturing Process:
Blending of ester and polyester resins to client specifications.

Sources of Process Wastewater:
No process water discharged from this operation. All discharges from the facility are batch discharges which are sampled prior to discharge.

Categorical Industry? Yes

Basis for Limits: local limits with prohibition against discharging process wastewater.

Point of Application: at discharge to POTW

Description of Pretreatment Equipment and Procedures:
n/a

Spill Prevention and Solvent Management Procedures:
no open drains in plant. Bulk storage has containment.

Sampling Location and Equipment:
grab samples from batch discharge operation.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Dennis Benson and Jill Glenn</u>	
NAME OF FACILITY:	<u>Jacksonville Wastewater</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0041335</u>	NPID
DATE OF PCI:	<u>05/07-08/08</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>13</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>1</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN