

ADEQ

A R K A N S A S
Department of Environmental Quality

October 5, 2016

Thea Hughes
Jacksonville WW Utility
248 Cloverdale Road
Jacksonville, AR 72076

RE: Jacksonville WW Utility Inspection
AFIN: 60-00543 Permit No.: AR0041335

Dear Ms. Hughes,

On August 29, 2016, 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.


All violations were corrected within 48 hours of the inspection date. Please refer to the attached inspection report for any comments.

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

Sincerely,



Erica McAdoo
District 9 Field Inspector
Office of Water Quality

 A R K A N S A S Department of Environmental Quality	WATER DIVISION INSPECTION REPORT				
	AFIN: 60-00543	PERMIT #: AR0041335	DATE: 8/29/2016		
	COUNTY: 60 Pulaski	PDS #: 093168	MEDIA: WN		
	GPS LAT: 34.8439 LONG: -92.1284 LOCATION: General Area				
FACILITY INFORMATION		INSPECTION INFORMATION			
NAME: Jacksonville WW Utility LOCATION: 248 Cloverdale Road, CITY: Jacksonville		FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 27312 S - State FACILITY EVALUATION RATING: 5 - Satisfactory INSPECTION TYPE: Pretreatment Compliance			
RESPONSIBLE OFFICIAL		DATE(S): 8/29/2016 ENTRY TIME: 09:00 EXIT TIME: 10:30 PERMIT EFFECTIVE DATE: 11/1/2012 PERMIT EXPIRATION DATE: 10/31/2017			
NAME / TITLE: Thea Hughes / COMPANY: Jacksonville WW Utility MAILING ADDRESS: 248 Cloverdale Road CITY, STATE, ZIP: Jacksonville AR 72076 PHONE & EXT. / FAX: 501-982-0581 / EMAIL: mike@jwwu.com		FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: Yes		INSPECTION PARTICIPANTS			
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Kevin McGill Bruce Jones Kieth Waters, ADEQ			
AREA EVALUATIONS					
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
S	PERMIT	S	FLOW MEASUREMENT	N	STORMWATER
S	RECORDS/REPORTS	N	LABORATORY	S	FACILITY SITE REVIEW
S	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
**	OTHER:				
SUMMARY OF FINDINGS					
This facility is well maintained and operated in an extremely efficient manner. I did not observe any violations during this inspection.					

GENERAL COMMENTS

During this Pretreatment Compliance Inspection, I visited three facilities: Little Rock Airforce Base, Ashland Chemical, and Two Pine Landfill. The following observations were made during this inspection.

Ashland Chemical:

- No violations were observed

Two Pine Landfill:

- a) Hydraulic fluid buckets and fuel cans were located within the active portion of the landfill. Please ensure that these containers are empty and are not exposed to the weather, if they contain any residual contaminants.
- b) All containers were moved immediately after this inspection by Cloris Grissel, CEG Construction.

Little Rock Air Force Base:

1. **Arnold School**
 - evidence of spilled grease around the newly installed grease trap
 - no berm for spill containment
2. **Bld. 787/ BX and Food Court**
 - middle grease trap required grease removal
3. **Bld. 790/ Defense Commissary Agency**
 - Inspection dated February 18, 2016 stated the trap required pump out. However there was no indication that a pump out occurred. Inspection dated August 29, 2016 stated the grease trap was "ok".
 - grease trap required grease removal
4. **Bld. 789/ Burger King**
 - Inspections dated September 16, 2016, December 17, 2015, and May 2, 2016 stated that the grease trap required pump out. However there was no indication that a pump out occurred.
 - Last inspection date was August 29, 2016 and was said to be in good condition, "ok"
 - I observed evidence of a grease spill (dumping) on the grass near the containment unit and the grease trap needs maintenance (pump out).
5. **Bowling Alley**
 - Last pump out was conducted on April 15, 2016
 - grease trap required grease removal
6. **Bld. 834/ Dining Facility**
 - grease trap required grease removal

I received an email from Kevin McGill on September 7, 2016 stating that corrective actions have taken place at several locations, and are scheduled at the remaining facilities with grease containment systems.

This email contained information from Dwight Henderson, WS-10, WFSM Foreman, at LRAFB. He stated that they "...pumped and cleaned grease traps at B-1990 (CDC), B-787 (Starbucks), B-956 (Bowling Alley), and B-1075 (Golf Course) and dumped into 4500 gallons grease trap at B-834 (DFAC). DFAC grease trap is scheduled to be pumped and cleaned Thursday morning. Please report this to JWWU. Also, grease trap at B-120 (In Flight Kitchen) is no longer in service. DFAC personnel no longer cook at this facility."

All observed violations at this facility (LRAFB) were corrected in a timely manner.

A maintenance schedule may be required to ensure the grease trap systems are pumped out routinely, based on facility usage.

INSPECTOR'S SIGNATURE: <i>Erica McAdoo</i> Erica McAdoo	DATE: 9/26/2016
SUPERVISOR'S SIGNATURE: <i>Clark Baker</i> Clark Baker	DATE: 10/4/2016

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: **Jacksonville Waste Water Utility**

AFIN Number: **60-00543**

NPDES Permit Number(s): **AR0041335**

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

Fact Sheet Preparation Date: _____

Date of Last PCI/Audit: **April 15, 2013; Rufus Torrence**

Date of Last Annual Report: **2015**

Name of Inspector: **Erica McAdoo**

Date PCI Performed: **8/29-30/2016**

Name, Title, and Telephone Number of Facility Representative:
Kevin McGill, Pretreatment Coordinator 501-982-0581

Name and Title of Other Participants: **Bruce Jones, Jacksonville
WW Operator**

Number of IUs Visited: **3**

Name(s) of IUs Visited: **Ashland Chemical, LRAFB, Two Pine
Landfill**

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. None

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?
Chamber of Commerce, Water Department Building business inspections on all new businesses.

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) 3

6. Number of Categorical Industrial Users: 1

7. How does the POTW determine the appropriate categorical standards to apply to an IU? 40 CFR and EPA Pretreatment Categories and Standards

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>Thermosetting Resins</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>3</u>	<u>AR0041335</u>	<u></u>	<u></u>
Effluent:	<u>3</u>	<u>AR0041335</u>	<u></u>	<u></u>
Sludge:	<u>1</u>	<u></u>	<u></u>	<u></u>
Organics:				
Influent:	<u>1</u>	<u>AR0041335</u>	<u></u>	<u></u>
Effluent:	<u>1</u>	<u>AR0041335</u>	<u></u>	<u></u>
Sludge:	<u>1</u>	<u></u>	<u></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? Yes

2. How many IU permits (or other control documents) have been issued? 3

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: U

Type of sample: U

Monitoring frequency: U

Bypass prohibition: U

Right of entry: U

Nontransferability: U

Revocation clause: U

Penalty Provisions: U

Slug load notification: U

Notification of process change: U

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>1</u>	<u>1</u>
other SIUs	<u>2</u>	<u>2</u>
Inspection:		
categorical IUs	<u>1</u>	<u>1</u>
other SIUs	<u>1</u>	<u>1</u>

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

3. Are inspections announced or unannounced? Announced

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

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: Very Good

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL

Inspection Report: **Jacksonville WW Utility**, AFIN: **60-00543**, Permit #: **AR0041335**
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? Documents received by administration personnel, date stamped, and electronically scanned for filing
-
-
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes
Yes
-
-
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?

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

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: _____

Other environmental permits held: _____

Description of operations: _____

Process flow diagrams: _____

Flow measurements: _____

Measurements of regulated pollutants: _____

Certification of compliance by the IU: _____

Compliance schedule (if needed): _____

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

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? **Enforcement response procedures outlined in ordinance 1360**

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

Effluent limitations: **NOV's and resample**

Late reports: **NOV**

Unpermitted discharges: _____

Slug loads or spills: _____

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)? None

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:
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:

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:
None

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: N/A

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Ashland Chemical**

POTW Name: **Jacksonville Waste Water Utility**

Industry Contacts: **Mike Taylor**

Date and Time of Visit: **8/29/2016**

Description of Manufacturing Process:
Bulk storage and reactor plant concerned with the manufacturing of styrene resins

Sources of Process Wastewater:
No process waste water is generated at this facility

Categorical Industry? **Yes**

Basis for Limits: **Thermosetting Resins**

Point of Application: _____

Description of Pretreatment Equipment and Procedures:
Majority of waste water discharged to sanitary sewer is from domestic sources within the plant.
All waste water is collected in a holding tank with the inline pH and flow monitoring equipment installed.

Spill Prevention and Solvent Management Procedures:
All material from potential spills would flow into the stormwater drainage channel and be contained in this area

Sampling Location and Equipment:
Stormwater drainage channel

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Little Rock Air Force Base**

POTW Name: **Jacksonville Waste Water Utility**

Industry Contacts: **Betty Gamber, Dwight Henderson, Lynn Shaw**

Date and Time of Visit: **8/30/2016**

Description of Manufacturing Process:
Municipal waste water, oil and grease from establishments

Sources of Process Wastewater:
No process wastewater

Categorical Industry? **No**

Basis for Limits: **N/A**

Point of Application: _____

Description of Pretreatment Equipment and Procedures:
All kitchen waste water is sent to oil and grease containment units, then pumped out and sent to an appropriate facility

Spill Prevention and Solvent Management Procedures:
Standard SSO procedures

Sampling Location and Equipment:
N/A

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Two Pine Landfill**

POTW Name: **Jacksonville Waste Water Utility**

Industry Contacts: **Paul Marks**

Date and Time of Visit: **8/30/2016**

Description of Manufacturing Process:
Waste management/Landfill

Sources of Process Wastewater:
Potential leachate from landfill
10.9 pervious acres; 0.3 impervious acres

Categorical Industry? **No**

Basis for Limits: **N/A**

Point of Application: _____

Description of Pretreatment Equipment and Procedures:
Located in permit and SWPPP

Spill Prevention and Solvent Management Procedures:
Located in SWPPP

Sampling Location and Equipment:
Located in SWPPP