

February 11, 2020

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

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

Dear Ms. Hughes:

On January 15 and 16, 2020, 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.

**Please refer to the “Summary of Findings” section of the attached inspection report and provide a written response for each item that was noted.** This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address at the bottom of this letter or e-mailed to [Water-Inspection-Report@adeq.state.ar.us](mailto:Water-Inspection-Report@adeq.state.ar.us). This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by **March 6, 2020**.

If I can be of any assistance, please contact me at [Bolenbaugh@adeq.state.ar.us](mailto:Bolenbaugh@adeq.state.ar.us) or 501-682-0659.

Sincerely,




Jason Bolenbaugh  
Compliance Branch Manager  
Office of Water Quality

CC: Adam Yates, DEQ Pretreatment Coordinator


**Division of Environmental Quality**

5301 Northshore Drive, North Little Rock, AR 72118-5137  
[adeq.state.ar.us](http://adeq.state.ar.us)

 ARKANSAS ENERGY & ENVIRONMENT		OFFICE OF WATER QUALITY INSPECTION REPORT					
		AFIN: 60-00543		PERMIT #: AR0041335		DATE: 1/15/2020	
		COUNTY: 60 Pulaski		PDS #: 110963		MEDIA: WN	
		GPS LAT: 34.843961 LONG: -92.128486 LOCATION: Entrance					
FACILITY INFORMATION			INSPECTION INFORMATION				
NAME: <b>Jacksonville WW Utility</b> LOCATION: <b>248 Cloverdale Rd.</b> CITY: <b>Jacksonville</b>			FACILITY TYPE: <b>1 - Municipal</b>	INSPECTOR ID#: <b>83321 S - State</b>		FACILITY EVALUATION RATING: <b>3 - Satisfactory</b>	INSPECTION TYPE: <b>Pretreatment Compliance</b>
RESPONSIBLE OFFICIAL			DATE(S): <b>1/15/2020</b>	ENTRY TIME: <b>08:30</b>	EXIT TIME: <b>14:00</b>	PERMIT EFFECTIVE DATE: <b>8/1/2018</b>	
NAME: / TITLE <b>Ms. Thea Hughes / General Manager</b> COMPANY: <b>Jacksonville Wastewater Utility</b> MAILING ADDRESS: <b>248 Cloverdale Rd.</b> CITY, STATE, ZIP: <b>Jacksonville AR 72076</b> PHONE & EXT: / FAX: <b>501-982-0581 /</b> EMAIL: <b>thea@jwwu.com</b>			<b>1/16/2020</b>	<b>09:00</b>	<b>11:00</b>	PERMIT EXPIRATION DATE: <b>7/31/2023</b>	
CONTACTED DURING INSPECTION: <b>Yes</b>			FAYETTEVILLE SHALE RELATED: <b>***</b>				
			FAYETTEVILLE SHALE VIOLATIONS: <b>***</b>				
			INSPECTION PARTICIPANTS				
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Thea Hughes, General Manager, JWU</b> <b>Mike Overstreet, Operations Manager, JWU</b> <b>Patrick Ellis, Laboratory Supervisor, JWU</b> <b>Drew Waters, Inspector, DEQ</b> <b>Blain Sanders, Inspector, DEQ</b>				
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	M	PRETREATMENT		
**	OTHER:						
SUMMARY OF FINDINGS							
<ul style="list-style-type: none"> <li>Precision Brass and Bullet was purchased by Sig Sauer, LLC. The facility is operating in the same function as a small arms ammunition facility. The facility remains a Significant Industrial User that does not discharge to the sanitary sewer. A new permit has not been issued but is in draft with a potential issue date of February, 2020. Please provide notification when the permit will be issued to the SIU.</li> <li>Two Pine Landfill's permit expired on February 11, 2019. Per City of Jacksonville Ordinance #1360, the Manager of the Jacksonville Wastewater Utility (JWU) may extend the expiration date of a permit for up to one year. Pretreatment options were still being evaluated by JWU and Two Pine Landfill and it was unknown at the time when a new permit would be issued. It was recommended to JWU a permit be issued according to their ordinance until such time a potential new pretreatment option was decided on. Please provide notification detailing when a permit will be issued to the SIU.</li> <li>Problems were noted regarding the sampling method, frequency, and required pollutants for Sig Sauer, LLC. First, the sampling method used to collect samples was the grab method. According to the permit only Oil &amp; Grease, Cyanide, and TTO are to be collected using the grab method and all other pollutants are to be collected using a 24-hour flow proportional composite. These errors occurred in 2018 and 2019. Second, silver and zinc were not collected and/or analyzed on a monthly basis in 2018. Records show those two pollutants were analyzed on a quarterly basis. Finally, a review a sampling data for Little Rock Air Force Base (LRAFB) also showed JWU was collecting samples on a semi-annual basis when the permit required quarterly sampling. A review of LRAFB's sampling data revealed quarterly sampling was not conducted during the first or fourth quarter of 2018 and 2019. JWU should immediately begin collecting samples for all pollutants identified in the permits, and also collect using the appropriate sampling method and the appropriate frequency.</li> </ul>							

**GENERAL COMMENTS**

- **Per Part II, Condition 7.D of the permit, an updated pretreatment program status report is due by February 29, 2020.**
- **JWU is currently seeking a new pretreatment coordinator following the sudden retirement of the individual that held that position prior to the audit.**
- **Sig Sauer, LLC, Two Pine Landfill, and Little Rock Air Force Base discharge to the sanitary sewer. Sig Sauer, LLC (formerly Precision Brass & Bullet) and INEOS do not discharge to the sanitary sewer. JWU conducts all compliance sampling for the SIU's that discharge.**

INSPECTOR'S SIGNATURE:	←Click text to left to add signature	<b>-Inspector Name</b>	DATE:
SUPERVISOR'S SIGNATURE:			DATE: <b>2/11/2020</b>
Jason Bolenbaugh			

Name of Municipality: Jacksonville Wastewater Utility (JWU)
AFIN Number: 60-00543
NPDES Permit Number(s): AR0041335, ARR000254
Program Tracked under NPDES Permit Number: AR0041335
Fact Sheet Preparation Date: Prior to August 1, 2018
Date of Last PCI: August 29, 2016
Date of Last Pretreatment Audit: March 19-21, 2013
Date of Last Annual Report: February 6, 2019 (2018 Report)
Name of Inspector: Jason Bolenbaugh, OWQ Compliance Branch Manager, DEQ
Date PCI Performed: January 15-16, 2020
Name and Title of Facility Representative: Thea Hughes, General Manager, JWU
Name and Title of Other Participants: Mike Overstreet, Operations Manager, JWU Patrick Ellis, Laboratory Supervisor, JWU Drew Waters, OWQ Inspector, DEQ Blain Sanders, OWQ Inspector, DEQ
Number of IUs Visited: 2
Name(s) of IUs Visited: Sig Sauer, LLC., 1809 Swift Drive, Jacksonville, AR 72076 Waste Management of Arkansas, Inc. d/b/a Two Pine Landfill, 100 Two Pine Drive, North Little Rock, AR 72117
<b>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.</b>

**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 PCI.

- Sig Sauer, LLC has been added since the last PCI. The cities industrial wastewater discharge permit was issued on July 1, 2017.
- Sig Sauer, LLC also purchased Precision Brass & Bullet.
- Ashland Chemical, LLC is now called INEOS.

2. Has ADEQ or EPA been notified of these changes? No, but an update will occur when the annual report is to be submitted to the DEQ by February 29, 2020 according to Part II, Condition 7.D of the permit.

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

4. What procedures are being used to update the IU Survey? Surveys are updated during permit renewals.

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): 5

6. Number of Categorical Industrial Users: 3

7. How does the POTW determine the appropriate categorical standards to apply to an IU? JWU uses 40 CFR and also applies local limits.

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:
INEOS	40 CFR 414, Organic Chemicals, Plastics, Synthetic Fibers	Polyester Resins Manufacturing
Sig Sauer, LLC Formerly Precision Brass & Bullet	40 CFR 433, Metal Finishing	Small Arms Projectile Manufacturing
Sig Sauer, LLC	40 CFR 433, Metal Finishing	Small Arms Ammunition Manufacturing

**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. There are currently no apparent problems with the local limits being applied to the industrial users.

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 II, Condition 7(C) of NPDES Permit AR0041335?

<b>Pollutant:</b>	<b>Sampling Frequency</b>	<b>Permit Requirement</b>	<b>Program Requirement</b>
Metals:			
Influent:	<b>Quarterly</b>	<b>Quarterly</b>	<b>Quarterly</b>
Effluent:	<b>Quarterly</b>	<b>Quarterly</b>	<b>Quarterly</b>
Sludge:	<b>Annually</b>		

Organics:			
Influent:	<b>Annually</b>	<b>Annually</b>	<b>Annually</b>
Effluent:	<b>Annually</b>	<b>Annually</b>	<b>Annually</b>
Sludge:	<b>Annually</b>		

Comments:

4. Have there been any inhibitions or upsets at the POTW since the last PCI which were believed to be caused by industrial discharges? If so, describe the action taken by JWU to ensure that the incident would not recur. Were these actions effective? There have been no inhibitions or upsets at the POTW caused by the industrial user.

**C. INDUSTRIAL USER CONTROL MECHANISM**

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program?  
 Yes, JWU issues a permit to the Industrial User. JWU has also established Ordinance No. 1360 - Section 13.24.09 that establishes prohibitive discharges to the sanitary sewer.

2. How many IU permits (or other control documents) have been issued? At the time of the inspection 4 permits were issued. Sig Sauer, LLC, Little Rock Air Force Base, and INEOS had active permits. Two Pine Landfill's permit was expired but was in the one year extension period provided by Ordinance 1360. The facility that once was Precision Brass & Bullet but is now Sig Sauer, LLC did not have an active permit issued but was under review.

**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.**

- Sig Sauer, Inc.: 7/1/17 - 6/30/20 (Permit 17-05-30)
- INEOS: 1/1/20 - 12/31/23 (Permit 86-02-01)
- Sig Sauer, LLC (Precision Brass & Bullet): No Permit
- Little Rock Air Force Base: 1/1/18 - 12/31/20 (Permit 87-08-12)
- Two Pines Landfill: 2/11/16 - 2/11/19 (Permit 03-10-10)

4. Does the control document contain the following items? List the section of the permit (Sig Sauer, LLC. permit review) each item is listed under.

An expiration date: Yes

Discharge limitations: Part I: Limitations

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: Part II

IU reporting requirements: Part III, Condition 2

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 II, Condition 2

Type of sample: Part I

Monitoring frequency: Part II, Conditions 2

Bypass prohibition: It is recommended JWU add a bypass prohibition condition into the industrial user permits that are issued.

Right of entry: Part IV, Condition 2

Non-transferability: Part IV, Condition 5

Revocation clause: Part IV, Condition 7

Penalty Provisions: Part IV, Condition 8

Slug load notification: Part III, Condition 1.A & Condition D
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Notification of process change: Part III, Condition 2.B
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**D. MONITORING OF IUS BY POTW**

1. Indicate current inspection and sampling frequency and program requirement below (See 40 CFR 403.8(f)(2)(v)).

	Current frequency:	Program Requirements:
Sampling:		
Categorical IUs	Annually	Annually
Other SIUs	Annually	Annually
Non-SIUs	N/A	N/A

Inspection:		
Categorical IUs	Annually	Annually
Other SIUs	Annually	Annually
Non-SIUs	N/A	N/A

Comments: Sig Sauer, LLC, Two Pine Landfill, and Little Rock Air Force Base discharge to the sanitary sewer. Sig Sauer, LLC (formerly Precision Brass & Bullet) and INEOS do not discharge to the sanitary sewer. There are no Non-SIU's that discharge to the sanitary sewer.

**2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes. Inspections are conducted on an annual basis and JWU conducts all of the compliance sampling for their SIUs.**

3. Are inspections announced or unannounced? Both.

4. Are records kept of each inspection? Yes, but inspections conducted in 2019 by the previous pretreatment coordinator could not be located so JWU inspected all of the facilities again in December, 2019.

5. Does the inspection report contain an adequate description of the following (Used Two Pines Landfill inspection report):

Date and time of inspection: May 10, 2018

Officials present: Kevin McGill JWU Pretreatment Coordinator

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):

Comments: Part C.2 of the report notes sample results and reports are on file but it does not comment further on whether approved analytical techniques are used. Some reports were more informative than others. Moving forward JWU should ensure inspections reports are thorough and consistent throughout all of the facilities.

6. Please describe the overall adequacy of inspection documentation:

Please see the comment section in #5 above.

**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). No, errors were noted during the review of Sig Sauer, LLC sampling data in May 2018 and in 2019. Please refer to the Summary of Findings.**

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

9. Are sampling and flow monitoring equipment properly maintained? Yes. LRAFB and Two Pine Landfill discharges are metered.

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. JWU does have the ability to conduct emergency sampling if needed. There is an EQ basin on site that flows can be directed to if there is an emergency.

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? The POWQ will follow-up with phone calls, letters, and emails acknowledging receipt of documents or additional information requests.

**15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? JWU conducts all monitoring for the SIU's.**

**16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes, JWU does require a report documenting violations and any necessary corrective actions.**

17. What are the POTW's procedures for following up violations? JWU requires documentation noting any violations and corrective actions taken to ensure the violation has been examined to reduce the possibility of a future violation. For example, when Sig Sauer, LLC had a permit violation for lead they were notified by JWU, took the necessary corrective measures, and

submitted a report to JWU.

**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: Sig Sauer, LLC.

Other environmental permits held: RCRA - ARR000028597

Description of operations: Small Arms Ammunition Manufacturer

Process flow diagrams: Included in Appendix 1 of the BMR

Flow measurements: Avg. Flow Rate of 28,800 gallons per day

Measurements of regulated pollutants: Lead, Nickel, Zinc, Copper

Certification of compliance by the IU: Yes

Compliance schedule (if needed): Not required

19. Additional comments on the POTW's inspection and sampling procedures: Some reports were more informative than others. JWU staff conducted thorough inspections in December 2019.

**E. Enforcement**

**1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, enforcement protocols, types of violations, and possible penalties are outlined in Ordinance 1360.**

2. How does the POTW respond to the following violations?  
 The enforcement hierarchy consists of the following: telephone call, Notice of Violation (NOV), second NOV, Notice sent to Board Attorney, Increased monitoring frequency and/or parameters, Corrective Order/Compliance Schedule, Administrative fines, Show-cause hearing, Revocation of permit, Termination of water and/or sewer services, Civil fines, Court injunctions, and Criminal prosecution. The severity of the violation will determine which enforcement action is necessary.

Effluent limitations: NOV issued and response requested

Late reports: Phone call, email, NOV

Unpermitted discharges: None have occurred but JWU will contact immediately; issue certified letter; NOV.

Slug loads or spills: None have occurred but JWU will contact immediately; issue certified letter; NOV.

**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, the Manager will annually publish in the largest daily newspaper published in the City of Jacksonville a list of Industrial Users which have been in Significant Non-Compliance during the previous twelve months.**

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.

There have not been any Significant Violators in the last twelve months.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:

5. Comments on the POTW's enforcement procedures: No additional comments.

<b>F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE</b>
1. Is the program structure essentially the same as that presented in the approved pretreatment program? Yes, but JWU is currently seeking a new pretreatment coordinator at this time.
2. Are staffing levels adequate? Yes, once a new pretreatment coordinator is hired staffing levels should be adequate given there are five SIU's in the program.
3. Are the responsible officials familiar with the approved program? Yes, and due to the sudden retirement of the previous pretreatment coordinator JWU staff have worked well to prepare for the audit under difficult circumstances.
<b>G. MULTIJURISDICTIONAL ISSUES</b>
1. List any IUs which are located outside of the jurisdictional area of the POTW: 0
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: JWU does not have any IU's outside of their jurisdiction that discharge to the sanitary sewer.

**PRETREATMENT COMPLIANCE INSPECTION - IU SITE VISIT FORM**

Name of Industry: Sig Sauer, LLC.
POTW Name: Jacksonville Wastewater Utility
Industry Contacts: Mr. Randall Simmons, Manager, Environmental Health & Safety Mr. Eriq Deaver, Junior Chemist
Date and Time of Visit: January 16, 2020 @ 9:00 AM
Description of Manufacturing Process: Manufacturer of Small Arms Ammunition
Sources of Process Wastewater: Sources of wastewater at this facility come from the brass line that forms shell casings as well a lead bullet manufacturing. However, wastewater from the brass line is the only wastewater that should be processed through the pretreatment system and then discharged to the sanitary sewer. All wastewater derived from the lead manufacturing process are captured in totes for evaporation off site.
Categorical Industry? Yes
Basis for Limits: 40 CFR 433
Point of Application: All wastewater from the brass line is sent to the pretreatment system for treatment and discharge to the sanitary sewer.
Description of Pretreatment Equipment and Procedures: The facility continuously monitors pH, flow, tank levels, and other components of the pretreatment system. As the brass casing is manufactured it will go through a series of alkaline washes and rinses. The pretreatment system has two 1,000-gallon tanks in which one receives only water from the wash tanks and the other 1,000-gallon tank only receives water from the rinse tanks. Wastewater from those two tanks will be sent to a 1,500-gallon mix tank where pH is adjusted and a coagulant or and flocculent will be added. Discharge from the mixing tank then enter into a clarifier where wastewater is then discharged to the sanitary sewer. Sludge is sent to a sludge tank and then to a filter press. Any wastewater remaining following the filter press will be sent back to the mixing tank.
Spill Prevention and Solvent Management Procedures: The facility is closely monitored by staff, management, and an off-site monitoring team. All spills are to be reported immediately to Mr. Simmons regardless of size. The facility maintains sill kits and the pretreatment system is within secondary containment.

There are no floor drains in the facility so all spills are contained inside. Training on spills and water management occur annually.

Sampling Location and Equipment: The sampling location is easily accessible but is near the base of the floor and allows for easily obtainable grab samples. JWU is going to have to evaluate their collection method when conducting the composite sampling.

**PRETREATMENT COMPLIANCE INSPECTION - IU SITE VISIT FORM**

Name of Industry: Two Pine Landfill (Waste Management Company)
POTW Name: Jacksonville Wastewater Utility
Industry Contacts: Jodi Reynolds, Mark Meadows
Date and Time of Visit: January 16, 2020 @ 10:15 AM
Description of Manufacturing Process: Municipal solid waste disposal
Sources of Process Wastewater: Leachate
Categorical Industry? No
Basis for Limits: Local Limits
Point of Application: Leachate is pumped to JWU's South Pump Station and then to the treatment plant.
Description of Pretreatment Equipment and Procedures: Two Pine Landfill has two Tank Farms, A and B. All tanks at Tank Farm A and B hold 20,000 gallons each. Tank Farm A has two tanks that serve to store leachate and Tank Farm B has four tanks. Aeration is added at Tank Farm B prior to discharge to JWU.
Spill Prevention and Solvent Management Procedures: Tanks are maintained in secondary containment.
Sampling Location and Equipment: The sampling location and equipment for conducting the necessary sampling was available on site. Semi-annual sampling is required according to the permit. JWU staff will need to familiarize themselves with the sampling equipment on site and ensure it is in good working order.



**PRETREATMENT COMPLIANCE INSPECTION - PPETS CODE SHEET**

CODE

INSPECTOR'S NAME: Jason Bolenbaugh

NAME OF FACILITY: Jacksonville Wastewater Utility

PERMIT NUMBER USED TO TRACK PROGRAM: AR0041335 NPID

DATE OF PCI: January 15-16, 2020 DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS): 5 SIUS

NUMBER OF CATEGORICAL IUS: 3 CIUS

SIUS NOT SAMPLED OR INSPECTED BY POTW: 0 NOIN

SIUS WITHOUT CONTROL MECHANISM: 1 NOCM

SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING: 0 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

**From:** [Mike Overstreet](#)  
**To:** [Water-Inspection-Report](#); [Bolenbaugh, Jason](#)  
**Subject:** Response to Pretreatment Inspection Report  
**Date:** Wednesday, March 4, 2020 12:53:10 PM  
**Attachments:** [DOC030420-03042020133912.pdf](#)

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Mike Overstreet  
Operations Manager  
Jacksonville Wastewater Utility  
248 Cloverdale Rd  
Jacksonville, AR  
72076  
501/982-0581 Work  
501/982-5791 Fax  
501/288-4864 Cell



March 4, 2020

Jason Bolenbaugh, Compliance Branch Manager  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Attn: Office of Water Quality Branch

RE: Response to Pretreatment Inspection Report  
Permit Number AR0041335  
AFIN 60-00543  
Jacksonville Wastewater Utility – J. Albert Johnson Regional Treatment Facility

Dear Mr. Bolenbaugh:

The following contains a written response and documentation describing the course of actions taken to correct each item noted under the “Summary of findings” and “General Comments” sections of ADEQ Pretreatment Inspection Report dated February 11, 2020.

**Summary of finding:**

1. Precision Brass and Bullet was purchased by Sig Sauer, LLC. The facility is operating in the same function as a small arms ammunition facility. The facility remains a Significant Industrial User that does not discharge to the sanitary sewer. A new permit has not been issued but is in draft with a potential issue date of February, 2020. Please provide notification when the permit will be issued to the SIU.

**Response:**

A new Industrial Discharge Permit was issued to Sig Sauer, LLC (Redmond Road location) on March 1, 2020 with expiration date of March 31, 2023.

**Summary of finding:**

2. Two Pine Landfill’s permit expired on February 11, 2019. Per City of Jacksonville Ordinance # 1360, the Manager of the Jacksonville Wastewater Utility (JWU) may extend the expiration date of a permit for up to one year. Pretreatment options were still being evaluated by JWU

and Two Pine Landfill and it was unknown at the time when a new permit would be issued. It was recommended to JWU a permit be issued according to their ordinance until such time a potential new pretreatment option was decided on. Please provide notification detailing when a permit will be issued to the SIU.

**Response:**

A new Industrial Discharge Permit was issued to Two Pine Landfill on February 11, 2020 with an expiration date of February 11, 2023.

**Summary of finding:**

3. Problems were noted regarding the sampling method, frequency, and required pollutants for Sig Sauer, LLC. First, the sampling method used to collect samples was the grab method. According to the permit only oil and grease, Cyanide, and TTO are to be collected using grab method and all other pollutants are to be collected using a 24-hour flow proportional composite. These errors occurred in 2018 and 2019. Second, silver and zinc were not collected and/or analyzed on a monthly basis in 2018. Records show those two pollutants were analyzed on a quarterly basis. Finally, a review of sampling data for Little Rock Air Force Base (LRAFB) also showed JWU was collecting samples on a semi-annual basis when the permit required quarterly sampling. A review of LRAFB's sampling data revealed quarterly sampling was not conducted during the first quarter or fourth quarter of 2018 and 2019. JWU should immediately begin collecting samples for all pollutants identified in the permits, and also collect using the appropriate sampling method and the appropriate frequency.

**Response:**

In accordance with Sig Sauer's Industrial Discharge Permit, JWU sampled Sig Sauer on January 28, 2020 and February 18, 2020 using a 4 part grab composite method with no less than one hour between each sample. JWU will continue to sample using the proper sampling methods.

Silver and zinc samples were collected and analyzed during sample events at Sig Sauer on January 28, 2020 and February 18, 2020, and will be sampled monthly as stated in permit.

In accordance with the Industrial Discharge Permit for LRAFB, the sampling event for first quarter of 2020 was completed on March 2 & 3, 2020, using a 24-hour flow proportional composite method. LRAFB will be sampled quarterly as stated in permit.

**General Comments:**

1. Per Part II, Condition 7.D of the permit, an updated pretreatment program status report is due by February 29, 2020.

**Response:**

The 2019 pretreatment program status report for Jacksonville Wastewater Utility was completed and sent to ADEQ on February 24, 2020.

2. JWU is currently seeking a new pretreatment coordinator following the sudden retirement of the individual that held that position prior to the audit.

**Response:**

JWU has hired an individual for the pretreatment coordinator position with an official start date of March 2, 2020.

JWU considers compliance with our NPDES permit and pretreatment program paramount to our daily operations and our staff will work diligently to ensure that the requirements are being met.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Overstreet". The signature is fluid and cursive, with the first name "Mike" and last name "Overstreet" clearly distinguishable.

Mike Overstreet  
Operations Manager