

Peltier, Hannah

From: Torrence, Rufus
Sent: Tuesday, April 16, 2013 2:20 PM
To: Kevin McGill
Cc: Peltier, Hannah
Subject: AFIN 60-00543 AR0041335 City of Jacksonville 2011 Annual Report
Attachments: JKVL 2012 Annual Report.pdf



April 16, 2013

Kevin McGill, Pretreatment Coordinator
Jacksonville Wastewater Utility
248 Cloverdale Road
Jacksonville, Arkansas 72076

Re: City of Jacksonville 2012 Annual Pretreatment Report
(Permit No. AR0041335 AFIN 60-00543)

Dear Mr. McGill:

The Department has reviewed the City's 2012 Annual Pretreatment Report and based on the Department's 2010 audit findings, the report is complete. However, the Department has three concerns:

1. The Maximum Allowable Headworks Concentration (MAHC) for copper was listed at 35.53 $\mu\text{g/l}$. Please refer to the Department letter dated February 17, 2012. The MAHC should be 65.98 $\mu\text{g/l}$.
2. The WQ limit for Copper is only 9.24 $\mu\text{g/l}$. The City reported Copper in the effluent as high as 8.6 $\mu\text{g/l}$. The City may consider additional Best Management Practices (BMPs) to ensure that the WQ limit for Copper is not exceeded.
3. The City listed several septic haulers as SIUs. Septic Haulers should be listed as NSIUs as they are not subject to regulation under the General Pretreatment Standards found in 40 CFR Part 403. The Department will perform an audit on the City of Jacksonville pretreatment

program in March 2013. The main objective of the audit will be to classify Users listed in the City's 2012 annual report as either SIUs or NSIUs.

The Department appreciates the City's continued efforts in annual reporting. If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us.

Sincerely,



Rufus Torrence, Pretreatment Engineer
Water Division

¹ EPA Local Limits Development Guidance Appendices; page R-2.

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5001 NORTHSHORE DRIVE - NORTH LITTLE ROCK / ARKANSAS 72118-5323
www.adeq.state.ar.us

ARHUN RT



Jacksonville Wastewater Utility

248 Cloverdale Road, Jacksonville, AR 72076
Phone: (501) 982-0581 Fax: (501) 982-5791
www.jwwu.com

February 13, 2013

Mr. Rufus Torrence
Pretreatment Coordinator, NPDES Branch
ADEQ
5301 North Shore Drive
North Little Rock, AR 72118

Subject: 2012 Pretreatment Report - AR0041335

Dear Mr. Torrence:

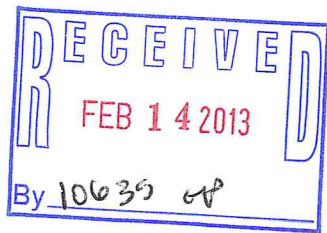
Enclosed please find the Jacksonville Wastewater Utility's Annual Pretreatment Program Status Report as required by NPDES Permit No. AR0041335. All industries have complied with their Industrial Wastewater Discharge Permits in 2012.

If you have any questions concerning the information contained in the attached report or should you require any additional information, please contact me at (501) 982-0581.

Sincerely,

JACKSONVILLE WASTEWATER UTILITY

Kevin McGill
Pretreatment Coordinator



ENCLOSURES: JACKSONVILLE WASTEWATER UTILITY 2012 Pretreatment Program Status Report

- ① IUs checked
- ② Annual Report updated
- ③ ICIS coded
- ④ Eff/Inf logged

1. INTRODUCTION

The Jacksonville Wastewater Utility submits the following report pursuant to our AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) AND THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT, Permit Number: AR0041335, Part III Standard Conditions, paragraph 1. The determination of Significant Noncompliance of an Industrial User was made by application of the criteria published in the July 24, 1990 Federal Register, amending 40 CFR 403.

2. INDUSTRIAL PRETREATMENT PROGRAM OVERVIEW

The Jacksonville Wastewater Utility currently has Ten (10) permitted significant industrial users. One of these, significant industrial users, is a categorical industry. This industry, Ashland Specialty Chemical Corporation is a zero discharge, regulated under 40 CFR 414. Below is a brief synopsis of all industrial users and their status.

① A. **Ashland Specialty Chemical Corporation** - This facility is a manufacturer of polyester resins and does not discharge any process water to the sanitary sewer but is permitted for spill control. The Industrial Wastewater Discharge Permit (IWDP) for this facility was renewed on January 1, 2011 and expires on December 31, 2013. On November 14, 2012 Ashland submitted a renewal package for a zero process discharge permit. This permit will go into effect on January 1, 2013. The permit prohibits the discharge of any process wastewater that would be regulated by the OCSFR category (40 CFR 414). This facility is aware of the requirements necessary to receive permission to discharge any regulated process wastewater. This facility experienced no violations of their IWDP in 2012 and currently has a valid IWDP for spill & slug protection and control.

② B. **Little Rock Air Force Base** - Little Rock Air Force Base (LRAFB) is a Department of Defense facility with the majority of their flow generated from domestic activities. LRAFB is a community of 10,000 people, with 1500 homes, and additional discharge from 2 dining halls, a club, 2 lounges, 6 fast food restaurants, 3 gas stations, 2 aircraft maintenance shops, an engine repair facility, 2 aircraft washing facilities, an automotive/vehicle repair facility, and a dry airplane painting facility. LRAFB's IWDP was renewed on January 1, 2012 and expires on December 31, 2014. The facility has experienced no violation of their Industrial Wastewater Discharge Permit in 2012 and LRAFB currently holds a valid IWDP.

X C. **North Metro Medical Center** - (formerly Rebsamen Medical Center) is a complete service hospital. Sources of process wastewater other than patient care is the pathology laboratory which uses formalin to preserve tissue samples for examination and testing and the cafeteria, which has an in-ground grease trap. The IWDP for this facility was renewed on January 1, 2010 and expired on December 31, 2012. North Metro Medical Center experienced no discharge violations of their IWDP in 2012. North Metro Medical Center changed over to digital X-rays on June 1, 2011. North Metro Medical Center permit was not renewed this year since they have completely changed over to digital X-rays.

③ D. **Two Pine Landfill** (a Waste Management Company) - Two Pine Landfill (TPL), a Class A Landfill, accepts municipal and commercial (non-industrial) wastes from the central Arkansas area. In December of 2010, TPL completed construction of a dedicated leachate pipeline from the landfill to JWU's Johnson Plant. The pipeline connects to the JWU collection system upstream of the South Jacksonville pump station. There is also a dedicated monitoring station at the Two Pine Landfill site. This station will allow JWU personnel to have full monitoring and sampling capabilities in one location. The IWDP for

allow JWU personnel to have full monitoring and sampling capabilities in one location. The IWDP for this facility was renewed on October 18, 2011 and expires on February 11, 2013. TPL experienced no violations of their IWDP in 2012 and currently has a valid IWDP.

NSIU
E. **Arkansas Portable Toilets** (dba Little John's Portable Toilets and Arkansas Portable Toilets) -- Arkansas Portable Toilets (APT) services portable toilets in the central Arkansas area. Chemicals used are prepackaged and intended for approximately one time use per portable toilet. The Industrial Wastewater Discharge Permit for this facility was renewed on January 1, 2011 and expires on December 31, 2013. The IWDP was issued for the discharge of Portable Toilet Waste to JWU. APT experienced no violations of their IWDP in 2012 and currently has a valid IWDP.

NSIU
F. **Metro Portable Toilets** – Metro Portable Toilets (MPT) services portable toilets in the central Arkansas area. Chemicals used are prepackaged and intended for approximately one time use per portable toilet. The IWDP for this facility was issued on August 1, 2007 and the IWDP was renewed on January 1, 2010 and expired on December 31, 2012. The IWDP was issued for the discharge of Portable Toilet Waste to JWU. MPT has not discharged to Jacksonville Wastewater Utility in 2012. Permit was not renewed by IU.

NSIU
G. **All Type Plumbing Co.** (dba U.S. Rooter) -- All Type Plumbing Inc. (ATPI) services septic tanks in the central Arkansas area. The IWDP for this facility was issued on October 25, 2007 and was renewed on January 1, 2010 and expired on December 31, 2012. The IDWP was issued for the disposal of domestic septage to JWU. ATPI has not discharged to Jacksonville Wastewater Utility in 2012. Permit was not renewed by IU.

NSIU
H. **Avery Septic Tank Cleaning** (ASTC) - Avery Septic Tank Cleaning services septic tanks in the central Arkansas area. The IWDP for this facility was renewed on January 1, 2012 and expires on December 31, 2014. The IDWP was issued for the disposal of domestic septage to JWU. ASTC experienced no violations of their IWDP in 2012 and currently has a valid IWDP.

NSIU
I. **Best Toilet's** (BT) – Best Toilet's services portable toilets in the central Arkansas area. Chemicals used are prepackaged and intended for approximately one time use per portable toilet. The IWDP for this facility was issued on January 28, 2011 and expires on December 31, 2013. The IWDP was issued for the discharge of Portable Toilet Waste to JWU. BT experienced no violations of their IWDP in 2012 and currently has a valid IWDP.

NSIU
J. **Wallace Pressure Washing** – Wallace Pressure washing is a company that pressure washes school buses. The IDWP for this facility was issued on March 22, 2010 and expires on March 22, 2013. The IWDP was issued for the discharge of process water collected after washing the buses. Wallace Pressure Washing has not discharged to Jacksonville Wastewater in 2012.

3. PRIORITY POLLUTANT SCAN AND QUARTERLY ANALYSIS

The Utility is required by AR0041335, part II, (7c), to perform an analysis of the Influent and Effluent flows for those pollutants listed in 40 CFR 122, Appendix D, Table III, at least once/quarter and is required to perform an

analysis of the Influent and Effluent flows for those pollutants listed in 40 CFR 122, Appendix D, Table II, once/year.

4. SLUDGE MONOFILL MONITORING

As required by Jacksonville Wastewater Utility's Solid Waste Permit #219-S3N-R1, the Utility has performed an analysis on the four monitoring wells and sludge for the pollutant parameters listed in the permit twice a year. In addition, sludge is monitored according to USEPA 40 CFR 503 regulations.

5. PRETREATMENT PERFORMANCE SUMMARY

Attached to this report is a copy of the completed EPA forms "Pretreatment Performance Summary", "Updated Significant Industrial User List", Significant Violators - Enforcement Actions Taken", and monitoring results.

6. PRETREATMENT INVESTIGATIVE TECHNIQUES AND OUTREACH PROGRAM

- The Utility has a program in effect that periodically checks and inspects the oil/water interceptors, sand traps, and grease interceptors to determine and observe the cleanliness and functioning of these pretreatment devices.
- The Utility has a program that will inspect the health care providers within the service area for proper disposal techniques for silver and mercury.
- The Pretreatment Coordinator is a certified Plumbing Inspector and is able to conduct Plumbing inspections of Commercial and or Industrial firms to determine if pretreatment devices are necessary before the facility opens for business.
- The City of Jacksonville requires a Privilege License Inspection from all commercial businesses prior to the business opening to the public. A representative from the Laboratory or Pretreatment Departments will inspect new businesses so that any business that creates a process wastewater stream will be evaluated by the Pretreatment Department for treatability.

7. PUBLICATION OF INDUSTRIAL USERS IN SIGNIFICANT NONCOMPLIANCE

All Jacksonville Wastewater Utility's Significant IUs were in compliance with their IWDP for the year 2012.



MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: JANUARY 1, 2012 TO DECEMBER 31, 2012
TREATMENT PLANT: City of JACKSONVILLE, AR NPDES PERMIT #AR0041335
AVERAGE POTW FLOW: 4.34 MGD % IU FLOW: 18 %

METALS, CYANIDE and PHENOLS	MAHC (Total) (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/quarter						WQ level/limit (µg/l)	EFFLUENT DATES SAMPLED (µg/l) Once/quarter						LABORATORY ANALYSIS		
		Date		Date		Date			Date		Date		Date		EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		Date	Date	Date	Date	Date	Date		Date	Date	Date	Date	Date				
Antimony	N/A	2/7/12	5/15/12	9/11/12	11/9/12	N/A	N/A	2/7/12	5/15/12	9/11/12	11/6/12	N/A	N/A	60	200.8	60	
Cadmium	5.58	<0.5	0.68	<0.5	<0.5	<0.5	1.84	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5		
Copper	35.53	19.0	45.0	44.0	58.0	9.24	9.24	5.2	8.6	7.1	7.5	7.5	0.5	200.8	0.5		
Lead	6.95	1.7	2.2	2.6	3.2	2.71	2.71	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5		
Mercury	0.03	0.026	0.082	0.17	0.26	0.01	0.01	<0.005	<0.005	<0.005	<0.005	<0.005	0.005	245.7	0.005		
Nickel	76.74	3.8	4.8	5.2	4.7	96.96	96.96	2.9	3.2	3.1	3.2	3.2	0.5	200.8	0.5		
Selenium	11.16	N/A	N/A	<5.0	<5.0	5.58	5.58	N/A	N/A	<5.0	<5.0	<5.0	5	200.8	5.0		
Silver	3.73	<0.5	0.67	<0.5	<0.5	0.93	0.93	<0.5	0.68	<0.5	<0.5	<0.5	0.5	200.8	0.5		
Zinc	167.71	57.0	140.0	120.0	140.0	85.53	85.53	27.0	45.0	25.0	58.0	58.0	20	200.8	20		
Chromium	280.75	<10.0	<10.0	<10.0	<10.0	295.43	295.43	<10.0	<10.0	<10.0	<10.0	<10.0	10	200.8	10		
Cyanide	18.72	N/A	N/A	<10.0	<10.0	5.8	5.8	N/A	N/A	<10.0	<10.0	<10.0	10	SM4500-CN C,E	10		
Arsenic	12.79	<0.5	<0.5	1.7	1.3	348.96	348.96	<0.5	<0.5	1.1	0.66	0.66	0.5	200.8	0.5		
Molybdenum	11.51	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	--	--	--		
Phenols	N/A	44.0	88.0	26.0	110.0	N/A	N/A	21.0	19.0	24.0	5.1	5.1	5	420.1	5		
Beryllium	11.83	N/A	N/A	<0.5	<0.5	5.91	5.91	N/A	N/A	<0.5	<0.5	<0.5	0.5	200.8	0.5		
Thallium	N/A	N/A	N/A	<0.5	<0.5	N/A	N/A	N/A	N/A	<0.5	<0.5	<0.5	0.5	200.8	0.5		
Flow, MGD	N/A	6.415	3.157	2.543	2.414	N/A	N/A	7.247	3.997	2.50	2.68	2.68					
(3) Bis(2ethylhexyl) phthalate	N/A	N/A	N/A	34.0	N/A	N/A	N/A	N/A	N/A	34.0	N/A	N/A	625	625	50.0		

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.**

(2) This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration

WQ - “Water Quality Levels not to exceed” OR actual permit limit.

**Attachment A
CITY OF JACKSONVILLE NPDES PERMIT # AR0041335
2012 PRETREATMENT PROGRAM STATUS REPORT**

Facility Name	SIC	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Compliance Status				
			Last Action	Y/N				BMR	90 Day Compliance	Semi-Annual Reports	Self Monitoring	Discharge Permit Limits
Ashland Specialty Chemical Company 1*	2821	Categorical # 40 CFR 414	RENEWED 1-1-11	Y	N	1	1	N/A	N/A	C	C	C
Arkansas/Go Potty/ L J's Portable Toilets 2*	7359	Noncategorical	RENEWED 1-1-11	Y	N	0	1	N/A	N/A	C	C	C
Avery Septic Tank Cleaning 2*	7699	Noncategorical	RENEWED 1-1-12	Y	N	0	1	YES	N/A	C	C	C
Metro Portable Toilets 2*, 4*, 5*	7359	Noncategorical	EXPIRED 12-31-12	Y	N	0	0	N/A	N/A	C	C	C
All Type Plumbing, Inc. 2*, 4*, 5*	7699	Noncategorical	EXPIRED 12-31-12	Y	N	0	0	N/A	N/A	C	C	C
Little Rock Air Force Base	9711	Noncategorical	RENEWED 1-1-12	Y	N	1	2	N/A	N/A	C	C	C
N. M. MED. CTR. (Rebsam Med Ctr) 3*	8062	Noncategorical	EXPIRED 12-1-12	Y	N	1	2	N/A	N/A	C	C	C
Two Pine Landfill	4953	Noncategorical	RENEWED 10-18-11	Y	N	1	2	N/A	N/A	C	C	C
Best Toilets 2*	7359	Noncategorical	ISSUED 1/28/2011	Y	N	0	1	N/A	N/A	C	C	C
Wallace Pressure Washing 2*, 4*	7542	Noncategorical	ISSUED 3-22-10	Y	N	0	0	N/A	N/A	C	C	C

① NSIU
NSIU
NSIU
NSIU X
②
③
NSIU X

1* This facility discharges domestic wastewater only, permit issued because IU determined categorical, IWDP also has a spill control mechanism.
 2* IU not inspected, mobile equipment is checked during discharge at treatment plant.
 3* IU Switched to digital X-rays no longer permitted
 4* IU has not discharged in 2012
 5* IU did not renew permit

PRETREATMENT PERFORMANCE SUMMARY (PPS) PERMIT # AR0041335

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT EPA AUTHORIZATION.

I. General Information

Control Authority Name	Jacksonville Wastewater Utility		
Address	248 Cloverdale Road		
City	Jacksonville	State/Zip	AR 72076
Contact Person	Kevin McGill	Position	Pretreatment Coordinator
Contact Telephone Number	(501) 982-0581		
NPDES Permit Nos.	AR 0041335		
Reporting Period	January 1, 2012 through December 31, 2012		
Total Number of Categorical IUs	One (1)		
Total Number of Significant Noncategorical IUs	Nine (9)		

II. Significant Industrial User Compliance

		Significant Industrial Users	
		Categorical	Noncategorical
1	No. of SIUs Submitting BMRs*/Total No. Required	1/1	0/0 9/9
2	No. of SIUs Submitting 90-Day Compliance Reports/No. Required	0/0	0/0
3	No. of SIUs Submitting Semiannual Reports/Total No. Required	0/0 3/3	0/0 1/1
4	No. of SIUs Meeting Compliance Schedule/Total No. Required to Meet Schedule	0/0	0/0
5	No. of SIUs in Significant Noncompliance/Total No. of SIUs*	0/1	0/0 0/2
6	Rate of Significant Noncompliance for all SIUs*		0/10 3/10

III. Compliance Monitoring Program

1	No. of Control Documents Issued/Total No. Required	<u>1/1</u>	<u>1/2</u> <u>6/9</u>
2	No. of Nonsampling Inspections Conducted	<u>1</u>	<u>3</u>
3	No. of Sampling Visits Conducted	<u>1</u>	<u>2</u> <u>2</u>
4	No. of Facilities Inspected (nonsampling)	<u>1</u>	<u>3</u> <u>3*</u>
5	No. of Facilities Sampled	<u>1/1</u>	<u>2/2</u> <u>6/9**</u>

*Inspections were not conducted at the following permit holders: Avery Septic Tank Cleaning, All Type Plumbing, Best Toilets, Wallace Pressure Washing, Arkansas Go Potty, and Metro Portable Toilets. These facilities do not have a building to stage their operations from and their equipment was inspected before issuing an IWDP.

** These facilities did not discharge process waters to JWU during the year: Wallace Pressure Washing, All Types Plumbing, and Metro Portable Toilets.

IV. Enforcement Actions

		Significant Industrial Users	
		Categorical	Noncategorical
1	No. of Compliance Schedules Issued/No. of Schedules Required	<u>0</u>	<u>0</u>
2	No. of Notices of Violations issued to SIUs	<u>0</u>	<u>0</u>
3	No. of Administrative Orders Issued to SIUs	<u>0</u>	<u>0</u>
4	No. of Civil Suits Filed	<u>0</u>	<u>0</u>
5	No. of Criminal Suits Filed	<u>0</u>	<u>0</u>
6	No. of Significant Violators (attach newspaper publication)	<u>0</u>	<u>0</u>
7	Amount of Penalties Collected (total dollars/IUs assessed)	<u>0</u>	<u>0</u>
8	Other Actions (sewer bans, etc.)	<u>0</u>	<u>0</u>

Attachment C

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.



Authorized Representative

Sam Zehtaban, Administrative Operations Manager



Date

PPS Program Report

* NPDES ID: AR0041335 Permittee's Name Jacksonville

* Report Received/Event Date: 02/14/13 Date 2-19-13

Report Type

Select a Program Report to add

- Biosolids Program Report
- CAFO Annual Report
- CSO Event Report
- Local Limits Report
- MS4 Program Report
- Pretreatment Performance Summary Report
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

Report Information

* Pretreatment Performance Summary Start Date: 01/01/2012

Significant Industrial Users (SIUs)

- SIUs: 3
- SIUs Without Control Mechanism: 0
- SIUs Not Inspected: 0
- SIUs Not Sampled: 0
- SIUs in SNC with Pretreatment Standards: 0
- SIUs in SNC with Reporting Requirements: 0
- SIUs in SNC with Pretreatment Schedule: 0
- SIUs in SNC Published in Newspaper: 0
- SIUs Schedules: 0
- Violation Notices Issued to SIUs: 0
- Administrative Orders Issued to SIUs: 0
- Civil Suits Filed Against SIUs: 0
- Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

- CIUs: 1
- CIUs in SNC: 0

Penalties

Dollar Amount of Penalties Collected: \$ 0

Industrial Users (IUs) from which Penalties have been collected: 0

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Violation of IU Schedule for Remedial Measures: No

Local Response to Violation of IU Schedule for Remedial Measures:

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval:

Removal Credits:

Acceptance of Waste

Acceptance of Hazardous Waste: No

Acceptance of Non-Hazardous Industrial Waste: No

Acceptance of Hauled Domestic Wastes: No

Deficiencies

Deficiencies Identified During IU File Review: No

Control Mechanism Deficiencies: No

Legal Authority Deficiencies: No

Deficiencies in Data Management and Public Participation: No

Deficiencies in Interpretation and Application of Pretreatment Standards: No

Inadequacy of Sampling and Inspections: No

Adequacy of Pretreatment Resources: Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling: