

Torrence, Rufus

From: Torrence, Rufus
Sent: Tuesday, March 02, 2010 1:12 PM
To: 'Sal Pappalardo'
Subject: AFIN 60-00543 AR0041335 City of Jacksonville 2009 Annual Report

ADEQ

ARKANSAS
Department of Environment and Quality

March 4, 2010

Sal Pappalardo, Pretreatment Coordinator
City of Jacksonville
248 Cloverdale Road
Jacksonville, Arkansas 72076

Re: City of Jacksonville 2009 Annual Pretreatment Report
(Permit No. AR0041335, ~~AR0043401~~ AFIN 60-00543)

Dear Mr. Pappalardo:

The Department has reviewed the City's 2009 Annual Pretreatment Report and the report is complete. However, the Department has some recommendations to improve the City's program operation and reporting.

1. Please list all SIUs (existing, new and discontinued) on Attachment A. If a facility status has changed (no closer classified as a SIU or "closed"), list the new status in the column titled "Control Document". Show either "Discontinued" or "Closed". After the City has reported the new status to the Department, the City may omit the discontinued/closed facility on future reports.
2. Referring to Allen Gilliam's email (attached), please list "non-detects" as "zero" for both influent and effluent values even though this contradicts Allen's email for influent values. We later agreed that both influent and effluent values should be reported the same way.

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 INF-EFF coded
- ② ICIS coded
- ③ IU's checked
- ④ ANRTID updated

RT



Jacksonville Wastewater Utility

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

February 16, 2010

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



Subject: 2009 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 2009.

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


Sal Pappalardo
Pretreatment Coordinator

Cc: Ms. Shirley Vaughan, ADEQ
NPDES Enforcement Water Division

ENCLOSURES

(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.

IAHL - 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
2009 PRETREATMENT PROGRAM STATUS REPORT**

Facility Name	SIC	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Compliance Status				Discharge
			Last Action	Y/N				BMR	90 Day Compliance	Semi-Annual	Self Monitoring	
Ashtland Specialty Chemical Company 1*	2821	Categorical # 40 CFR 414	RENEWED 1-1-08	Y	N	1	2	N/A	N/A	C	C	C
Arkansas/Go Potty/ L J's Portable Toilets	7359	Noncategorical	RENEWED 9-1-08	Y	N	1	1	N/A	N/A	C	C	C
Avery Septic Tank Cleaning *4	7699	Noncategorical	ISSUED 3-6-09	Y	Y	0	0	YES	N/A	C	C	C
Metro Portable Toilets 2*	7359	Noncategorical	ISSUED 8-1-07	Y	N	1	0	N/A	N/A	C	C	C
All Type Plumbing Inc. 4*	7699	Noncategorical	ISSUED 10-25-07	Y	N	0	1	N/A	N/A	C	C	C
Dirty Work Inc 2*, 4*	7542	Noncategorical	ISSUED 6-25-07	Y	N	0	0	N/A	N/A	C	C	C
Time to Shine Detailing *2, *4	7542	Noncategorical	ISSUED 3-9-09	Y	Y	0	0	YES	N/A	C	C	C
Little Rock Air Force Base	9711	Noncategorical	RENEWED 1-1-09	Y	N	1	2	N/A	N/A	C	C	C
National Swage 1*	3429 & 3542	Noncategorical	RENEWED 1-1-08	Y	N	1	0	N/A	N/A	C	C	C
N. M. MET. CTR. (Rebsam Med Ctr)	8062	Noncategorical	RENEWED 1-1-07	Y	N	1	2	N/A	N/A	C	C	C
Graphic Packaging Inc.	2673, 2674, 2679, & 2759	Noncategorical	RENEWED 1-1-09	Y	N	1	3	N/A	N/A	C	C	C
Two Pine Landfill	4953	Noncategorical	RENEWED 2-11-10*	Y	N	1	2	N/A	N/A	C	C	C
UNIVAR USA Inc. 2*	5169	Noncategorical	RENEWED 1-1-09	Y	N	1	0	N/A	N/A	C	C	C

1* This facility discharges domestic wastewater only; permit issued because IU determined categorical, IWD/P also as an spill control mechanism.
2* No process water discharge in 2009.

3* New Permittee (2007), has not generated wastewater for discharge by end of 2009.

4* IU not inspected, mobile equipment is checked during discharge at treatment plant.

* 60 day extension given on 10-10-09 and again on 12-10-09. Permit Finalized on 2-11-2010

C = Compliance, NC = Noncompliance, SNC = Significant Noncompliance, RD = Received, NR = Not Required, and N/A = Not Applicable

JACKSONVILLE WASTEWATER UTILITY
2008 Pretreatment Program Status Report

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 Other Conditions, paragraph 1, d. 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 thirteen (13) permitted significant industrial users. One of these, significant industrial users, is a categorical industry. This industry, Ashland Specialty Chemical Corporation is a zero discharger, regulated under 40 CFR 414. Below is a brief synopsis of all industrial users and their status.

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, 2008 and expires on December 31, 2010. The permit prohibits the discharge of any process wastewater that would be regulated by the OCSFR category (40 CFR 414). This facility was determined to be a categorical industry in May 2004 by Mr. Allen Gilliam, ADEQ State Pretreatment Coordinator. 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 2009 and currently has a valid IWDP for spill & slug protection and control.

B. **National Swage** - This plant manufactures swaging (a suspended cable harness) equipment, cable locks, and related items for heavy machinery, oil refinery-production, and construction. National Swage's alkaline cleaner tank (rinse water) is the only source of process wastewater, which produces very little wastewater. The IWDP for this facility was renewed on January 1, 2008 and will expire on December 31, 2010. In January 2003, National Swage completed a project that allows their facility to recycle all their process and cooling waters, which allows for zero process water discharge. The facility experienced no violation of their IWDP for the year 2009 and National Swage currently holds a valid IWDP for spill & slug protection and control.

C. **Graphic Packaging Inc.** - This facility was formerly named Altiivity Packaging Inc. and Smurfit-Stone Container Corporation. The facility manufactures and prints paper bags. Processes at this facility consist of gluing paper and printing. This facility operates an ALAR Filtration Pretreatment system for copper removal. The IWDP for this facility was renewed, effective January 1, 2009 and will expire on December 31, 2011. The facility experienced no violations of their IWDP in 2009 and has a currently has a valid IWDP.

D. **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 dinning halls, a club, 2 lounges, 2 fast food restaurants, 2 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, 2009 and expires on December 31, 2011. The facility has experienced no violation of their Industrial Wastewater Discharge Permit in 2009 and LRAFB currently holds a valid IWDP.

E. **North Metro Medical Center** – (formerly Rebsamen Medical Center) is a complete service hospital. Sources of process wastewater other than patient care are the radiology department that uses silver recovery system to recover silver from the waste stream, 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 expires on December 31, 2012. North Metro Medical Center experienced no discharge violations of their IWDP in 2009 and currently has a valid IWDP.

F. **UNIVAR USA Inc.** – UNIVAR USA Inc. is primarily a chemical distribution operation but it does have a small barrel (chemical totes) washing operation to reclaim and reuse barrels that have contained acid and caustics. This operation results in the discharge of a 2000-gallon batch discharge. Pollution Prevention (P2) activities such as reusable dedicated chemical totes, non-acceptance of any tote containing a heel of 1” or more in volume and the non-acceptance of totes other than those labeled UNIVAR (Vopak or Van Waters and Rogers), have enabled UNIVAR to reduce the amount of washing activities needed. UNIVAR has not discharged wash water during the year 2009. The IWDP for this facility was renewed on January 1, 2009 and expires on December 31, 2011. UNIVAR experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

G. **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. The Industrial Wastewater Discharge Permit for this facility was due to expire on October 9, 2009, for the discharge of Landfill Leachate to Jacksonville Wastewater Utility. Two Pines was given a 60 day permit extension on October 10, 2009 and again on December 10, 2009. The IWDP Permit was finalized and renewed on February 11, 2010. The leachate arrives at the J. Albert Johnson Regional Treatment Facility in a six-thousand (6,000) gallon tanker truck. The leachate is mixed with the influent wastewater stream for treatment. TPL experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

H. **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 September 1, 2008 and expires on August 31, 2010, for the discharge of Portable Toilet Waste to Jacksonville Wastewater Utility. APT experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

I. **Dirty Work Inc.** – Dirty Work Inc. (DWI) plans to wash vehicles on site, collect the wash water, and discharge the wash water after sediment filtration to Jacksonville Wastewater Utility. The sediment collected will be disposed into the garbage for disposal at a landfill. DWI intends to use a mild detergent (Dawn) for cleaning purposes. DWI has not discharged to JWU, but upon discharge, samples will be collected for the BMR. The Industrial Wastewater Discharge Permit for this facility was issued in 2007 and expires on January 1, 2010. DWI experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

J. **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 for the facility on August 1, 2007 and the IWDP was renewed on January 1, 2010. MPT experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

K. **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. The IDWP was issued for the disposal of domestic septage to JWU. ATPI experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

- L. **Avery Septic Tank Cleaning (ASTC)** - Avery Septic Tank Cleaning services septic tanks in the central Arkansas area. The IWDP for this facility was issued on March 6, 2009 and expires on December 31, 2011. The IDWP was issued for the disposal of domestic septage to JWU. ASTC experienced no violations of their IWDP in 2009 and currently has a valid IWDP.
- M. **Time to Shine Detailing (TTSD)**- Time to Shine Detailing details vehicles in the central Arkansas area. The IWDP for this facility was issued on March 9, 2009 and expires on December 31, 2011. TTSD has not discharged to Jacksonville Wastewater Utility in 2009.

3. **PRIORITY POLLUTANT SCAN AND QUARTERLY ANALYSIS**

The Utility is required by AR0041335, part III, (c), 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 except Antimony, Beryllium, Selenium, Thallium, and Cyanide which are required to be analyzed at least once/year 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-S, 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 2009.

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	Sal Pappalardo	Position	Pretreatment Coordinator
Contact Telephone Number	(501) 982-0581		
NPDES Permit Nos.	AR 0041335		
Reporting Period	January 1, 2009 through December 31, 2009		
Total Number of Categorical IUs	One (1)		
Total Number of Significant Noncategorical IUs	Twelve (12)		

II. Significant Industrial User Compliance			
		Significant Industrial Users	
		Categorical	Noncategorical
1	No. of SIUs Submitting BMRs*/Total No. Required	1/1	12/12
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	1/1	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	0/12
6	Rate of Significant Noncompliance for all SIUs*	0/13	

III. Compliance Monitoring Program

1	No. of Control Documents Issued/Total No. Required	1/1	12/12
2	No. of Nonsampling Inspections Conducted	1	9
3	No. of Sampling Visits Conducted	2	11
4	No. of Facilities Inspected (nonsampling)	1	9*
5	No. of Facilities Sampled	1/1	7/12**

*Inspections were not conducted at the following permit holders: Avery Septic Tank Cleaning, All Type Plumbing, Dirty Work, Inc. 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: Univar USA, Inc., Dirty Work Inc., Crosby National Swage, and Metro Portable Toilets.

IV. Enforcement Actions

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

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 City of Jackson

* Report Received/Event Date: 02/19/2010 Date 02/26/2010

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: 01/01/2009

Significant Industrial Users (SIUs)

- SIUs: 13
- 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: 1360
- SUO Date: 2/5/2009
- Annual Pretreatment Budget: \$ 203K
- Pass-Through/Interference Indicator: No
- Notification of IU Schedule for Remedial Measures: No
- Initial Response to Violation of IU Schedule for Remedial Measures: No

Local Limits

- Date of Most Recent Technical Evaluation & or Local Limits: 06/03/2006
 - Date of Most Recent Adoption of Technically Based Local Limits: 09/15/2000
 - Local Limit Pollutants: As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN
- "Symbols on Back" →

Removal Credits

- Removal Credits Application Status: Not Applicable
- Date of Most Recent Removal Credits Approval: X
- Removal Credits: X

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: 4
- Annual Frequency of Effluent Toxicant Sampling: 4
- Annual Frequency of Sludge Toxicant Sampling: 1