

## Peltier, Hannah

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**From:** Gilliam, Allen  
**Sent:** Friday, February 20, 2015 2:44 PM  
**To:** jacksonville kevin mcgill  
**Cc:** Fuller, Kim; Peltier, Hannah; Allen-Daniel, Leslie; Ramsey, David; Kaelin, Cynthia; Johnson, Miles; McDonald, Scott  
**Subject:** AR0041335\_Jacksonville Feb 2015 annual Pretreatment report with ADEQ reply\_20150220  
**Attachments:** DOC021715-02172015141855.pdf

Kevin,

Jacksonville's February 2015 annual Pretreatment report was received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i).

No further action is deemed necessary at this time.

Thank you for the brief synopsis of Jacksonville's "Investigative Techniques and Outreach Program". This helps to understand more about "outside the Pretreatment box" activities the City's Pretreatment personnel conduct and how potential significant industrial user information is gained.

A word of caution regarding Jacksonville's Cu Maximum Allowable Headworks Concentrations (MAHC) and "WQ levels [not to exceed]". The 1<sup>st</sup> and 3<sup>rd</sup> quarter influent results are within 80% of the MAHC and the 2<sup>nd</sup> quarter effluent result was within 99% of (I'm assuming) ADEQ derived WQ levels. This office would recommend identifying the source(s) and mitigate the levels of Cu in your collection system.

Glancing at your "Industries" (unless Two Pine Landfill discharges high Cu), one might start with Jacksonville's potable water and domestic background. A sampling regime may target your potable water and/or domestic background of being the main source(s). More efficient corrosion control has proven to reduce Cu loadings at one Pretreatment City in the past. Now would be the time to direct some attention to this potential Cu issue. NPDES Cu permit limits you don't want.

We may want to discuss this Cu issue further over the phone in the near future if you so desire.

Thank you for your timely report remaining in compliance with the Federal Pretreatment Program in 40 CFR 403.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

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**From:** Kevin McGill [<mailto:kevin@jwwu.com>]  
**Sent:** Wednesday, February 18, 2015 6:56 AM  
**To:** Gilliam, Allen  
**Subject:** Annual pretreatment report

Attached is Jacksonville's annual pretreatment report.

**Kevin McGill**  
**Pretreatment Coordinator**

**Jacksonville Wastewater Utility**  
**248 Cloverdale Road**  
**Jacksonville, Ar. 72076**  
**Phone: 501-982-0581**  
[kevin@jwwu.com](mailto:kevin@jwwu.com)

## Jacksonville Wastewater Utility



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

February 13, 2015

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

**Subject: 2014 Pretreatment Report - AR0041335**

Dear Mr. Gilliam:

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 2014.

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 2014 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 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 Three (3) 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.

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, 2013 and expires on December 31, 2016. 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 2014 and currently has a valid IWDP for spill & slug protection and control.

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 December 31, 2014 and expires on December 31, 2017. The facility has experienced no violation of their Industrial Wastewater Discharge Permit in 2014 and LRAFB currently holds a valid IWDP.

C. **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 this facility was renewed on February 11, 2013 and expires on February 11, 2016. TPL experienced no violations of their IWDP in 2014 and currently has a valid IWDP.

### 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 twice a year and sludge for the pollutant parameters listed in the permit once 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 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 2014.



(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**  
**2014 PRETREATMENT PROGRAM STATUS REPORT**

Facility Name	SIC	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Compliance Status				
			Last Action	Y/N				Reports				Discharge
								BMR	90 Day Compliance	Semi-Annual	Self Monitoring	Permit Limits
Ashland Specialty Chemical Company 1*	2821	Categorical # 40 CFR 414	RENEWED 1/1/13	Y	N	1	1	N/A	N/A	C	C	C
Little Rock Air Force Base	9711	Noncategorical	RENEWED 12/31/2014	Y	N	1	2	N/A	N/A	C	C	C
Two Pine Landfill	4953	Noncategorical	RENEWED 2/11/2013	Y	N	1	2	N/A	N/A	C	C	C

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1\* This facility discharges domestic wastewater only, permit issued because IU determined categorical, IWDP also has a spill control mechanism.





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, 2014 through December 31, 2014		
Total Number of Categorical IUs			One (1)
Total Number of Significant Noncategorical IUs			Two (2)

II. Significant Industrial User Compliance			
		Significant Industrial Users	
		Categorical	Noncategorical
1	No. of SIUs Submitting BMRs*/Total No. Required	0/0	0/0
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	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	0/2
6	Rate of Significant Noncompliance for all SIUs*	0/3	

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

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>

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

2/13/15

Date