

From: [Yates, Adam](#)
To: [Kevin McGill](#)
Cc: [Thea Hughes](#); [Mike Overstreet](#); [Burrow, Kealey](#); [McWilliams, Carrie](#); [Allen-Daniel, Leslie](#); [Healey, Richard](#)
Subject: RE: 2017 Pretreatment Report
Date: Friday, March 02, 2018 3:46:14 PM
Attachments: [AR0041335 Jacksonville Feb 2018 Pretreatment Program Annual Report 20180209.pdf](#)

Kevin,

Jacksonville Wastewater Utility's February 2018 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 CFR 403.12(i). Thank you for your timely submittal. If you have any questions or concerns, please feel free to contact me.

Kindly,

Adam Yates
State Pretreatment Coordinator
Office of Water Quality
Arkansas Department of Environmental Quality
Phone: (501) 682-0617
Fax: (501) 682-0880

G:\Shared Folders\Water\Pretreatment\Reports

From: Kevin McGill [mailto:kevin@jwwu.com]
Sent: Friday, February 09, 2018 11:08 AM
To: Yates, Adam
Cc: Thea Hughes; Mike Overstreet
Subject: 2017 Pretreatment Report

Mr. Yates,

Attached is the 2017 Annual Pretreatment report for Jacksonville Wastewater Utility. If you have any questions please contact me.

Kevin McGill
Jacksonville Wastewater Utility
Pretreatment Coordinator
P 501-982-0581 F 501-982-5791

Jacksonville Wastewater Utility



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

February 6, 2018

Mr. Adam Yates
Permit Engineer, NPDES Branch
ADEQ
5301 North Shore Drive
North Little Rock, AR 72118

Subject: 2017 Pretreatment Report - AR0041335

Dear Mr. Yates:

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 2017.

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 2017 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 Five (5) permitted significant industrial users. Three of these, significant industrial users, are categorical industries. These industries are Ashland Chemical LLC which is a zero discharger, regulated under 40 CFR 414, Precision Brass and Bullet which is a zero discharger, regulated under 40 CFR 433, and Sig Sauer regulated under 40 CFR 433. Below is a brief synopsis of all industrial users and their status.

A. **Ashland Chemical LLC** - 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, 2017 and expires on December 31, 2020. 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 2017 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 approximately 3500 people, with 400 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. A renewal permit was issued January 1, 2018 and expires on December 31, 2020. The facility has experienced no violation of their Industrial Wastewater Discharge Permit in 2017 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. Two Pine Landfill has 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 allows JWU personnel to have full monitoring and sampling capabilities in one location. The IWDP for this facility was renewed on February 11, 2016 and expires on February 11, 2019. TPL experienced no violations of their IWDP in 2017 and currently has a valid IWDP.

D. **Precision Brass and Bullet**- Precision Brass and Bullet is a small arms ammunition facility. This facility manufactures projectiles for small arms and does not discharge any process wastewater to the sanitary sewer. The Industrial Wastewater Discharge Permit (IWDP) was issued on November 1, 2016 and expires on October 31, 2019. The permit prohibits the discharge of any process wastewater that would be regulated by the OCSFR category (40 CFR 433). 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 2017 and currently has a valid IWDP for spill & slug protection and control.

E. Sig Sauer LLC- Sig Sauer is a new small arms ammunition facility. This facility manufactures and assembles small arms ammunition. The Industrial Wastewater Discharge Permit (IWDP) was issued on July 1, 2017 and expires on June 30, 2020. Sig Sauer has put in place a pretreatment system to meet all parameters regulated by OCSFR category (40 CFR 433) to include a reverse osmosis system. This facility experienced no violations of their IWDP in 2017 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 2017.

Attachment A
CITY OF JACKSONVILLE NPDES PERMIT # AR0041335
2017 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 1/1/2017	Y	N	1	0	N/A	N/A	N/A	N/A	N/A
Little Rock Air Force Base	9711	Noncategorical	RENEWED 12/31/2014	Y	N	4	2	N/A	N/A	C	C	C
Two Pine Landfill	4953	Noncategorical	RENEWED 2/11/2016	Y	N	1	2	N/A	N/A	C	C	C
Precision Brass and Bullet 2*	3482	Categorical # 40 CFR 433	NEW 11/1/2016	Y	N	1	0	N/A	N/A	N/A	N/A	N/A
Sig Sauer	3482	Categorical # 40 CFR 433	NEW 7/1/2017	Y	Y	1	6	C	C	C	C	C

--	--	--	--	--	--	--	--	--	--	--	--	--

1* This facility discharges domestic wastewater only, permit issued because IU determined categorical, IWDP also has a spill control mechanism.
2* This facility is a Zero discharge categorical user and discharges domestic waste only.

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, 2017 through December 31, 2017		
Total Number of Categorical IUs	Three (3)		
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	1/1	0/0
2	No. of SIUs Submitting 90-Day Compliance Reports/No. Required	1/1	0/0
3	No. of SIUs Submitting Semiannual Reports/Total No. Required	1/1	2/2
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*	0/3	0/2
6	Rate of Significant Noncompliance for all SIUs*	0/5	

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

Michael Overstreet, Operations Manager

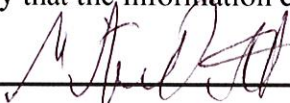
Date

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

2-9-18

 Date

Michael Overstreet, Operations Manager

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

(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.