

Jacksonville Wastewater Utility



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

February 24, 2020

Mr. Adam Yates
Permit Engineer, NPDES Branch
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118

Subject: 2019 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 complied with their Industrial Wastewater Discharge Permits in 2019.

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,

Mike Overstreet
Operations Manager

ENCLOSURES

**JACKSONVILLE WASTEWATER UTILITY
2019 ANNUAL PRETREATMENT PROGRAM STATUS REPORT (PPSR)
FEBRUARY 24, 2020**

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 (3) of these significant industrial users are categorical industries. The categorical industries are INEOS Composites, (formally Ashland Chemical LLC) which is a zero discharger, regulated under 40 CFR 414, Precision Brass and Bullet (bought by Sig Sauer October 2019) 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. INEOS Composites (formally 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 expired on December 31, 2019. A renewal permit was issued January 1, 2020 and expires on December 31, 2023. 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 2019 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 two dining halls, one club, two lounges, six fast food restaurants, three gas stations, two aircraft maintenance shops, an engine repair facility, two aircraft washing facilities, an automotive/vehicle repair facility, and a dry airplane painting facility. LRAFB's IWDP was renewed on January 1, 2018 and expires on December 31, 2020. The facility experienced no violation of their Industrial Wastewater Discharge Permit in 2019 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 1, 2016 and expired on February 1, 2019. The permit was extended to February 11, 2020, at which time a new renewal permit was issued to expire February 11, 2023. TPL experienced no violations of their IWDP in 2019 and currently has a valid IWDP.

D. Sig Sauer LLC- Sig Sauer is an ammunition facility. This facility manufactures and assembles 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 one violation of their IWDP in 2019 and currently has a valid IWDP.

E. Precision Brass and Bullet (Sold to Sig Sauer in October 2019) – 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 Discharge Permit (IWDP) was issued on November 1, 2016 and expired on October 31, 2019. The permit prohibits the discharge of any process wastewater that would be regulated by the OCSFR category (40CFR 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 2019 and had a valid IWDP for spill and slug load protection and control prior to their closure. A new permit for the new owner, Sig Sauer, is currently being processed.

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-RI, the Utility has performed an analysis on the four monitoring wells twice per year, and sludge once per year, for the pollutant parameters listed in the permit. 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 Laboratory Supervisor 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 2019.

Attachment A
CITY OF JACKSONVILLE NPDES PERMIT # AR0041335
2019 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
INEOS (Ashland)	2821	Categorical # 40 CFR 414	RENEWED 1/1/2020	Y	N	1	0	N/A	N/A	N/A	N/A	N/A
Little Rock Air Force Base	9711	Noncategorical	RENEWED 1/1/2018	Y	N	2	2	N/A	N/A	C	C	C
Two Pine Landfill	4953	Noncategorical	Renewed 2/11/2020	Y	N	1	2	N/A	N/A	C	C	C
Sig Sauer	3482	Categorical # 40 CFR 433	NEW 7/1/2017	Y	N	2	12	N/A	N/A	C	C	C
Precision Brass & Bullet	3482	Categorical # 40 CFR 433	Permit 11/20/2016 Facility closed Oct. 2019	Y	N	0	0	N/A	N/A	N/A	N/A	N/A
Sig Sauer 2 (formerly Precision Brass & Bullet)	3482	Categorical # 40 CFR 433	permit in process					N/A	N/A	N/A	N/A	N/A

ATTACHMENT B
SIGNIFICANT VIOLATIONS - ENFORCEMENT ACTIONS TAKEN

Industrial User Name	Nature of Violation		Number of Action Taken					Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other		Date Issued	Date Due		
Sig Sauer		X	1						12/9/2019	1/9/2019	C	

- Sig Sauer had one Lead violation, 11/20/2019.

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	<u>Jacksonville Wastewater Utility</u>		
Address	<u>248 Cloverdale Road</u>		
City	<u>Jacksonville</u>	State/Zip	<u>AR 72076</u>
Contact Person	<u>Mike Overstreet</u>	Position	<u>Operations Manager</u>
Contact Telephone Number	<u>(501) 982-0581</u>		
NPDES Permit Nos.	<u>AR 0041335</u>		
Reporting Period	<u>January 1, 2019 through December 31, 2019</u>		
Total Number of Categorical IUs	<u>Three (3)</u>		
Total Number of Significant Noncategorical IUs	<u>Two (2)</u>		

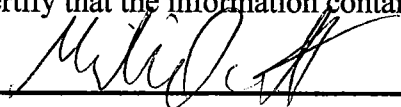
II. Significant Industrial User Compliance			
		Significant Industrial Users	
		Categorical	Noncategorical
1	No. of SIUs Submitting BMRs*/Total No. Required	<u>0/0</u>	<u>0/0</u>
2	No. of SIUs Submitting 90-Day Compliance Reports/No. Required	<u>0/0</u>	<u>0/0</u>
3	No. of SIUs Submitting Semiannual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

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>3</u>
3	No. of Sampling Visits Conducted	<u>12</u>	<u>4</u>
4	No. of Facilities Inspected (nonsampling)	<u>3</u>	<u>2</u>
5	No. of Facilities Sampled	<u>1</u>	<u>2</u>

IV. Enforcement Actions			
		Significant Industrial Users	
		Categorical	Noncategorical
1	No. of Compliance Schedules Issued/No. of Schedules Required	<u>0/0</u>	<u>0/0</u>
2	No. of Notices of Violations issued to SIUs	<u>1</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

2-24-2020

 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.

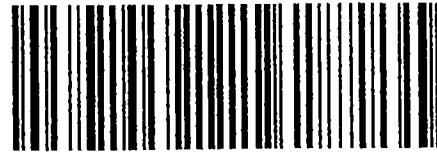
(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

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

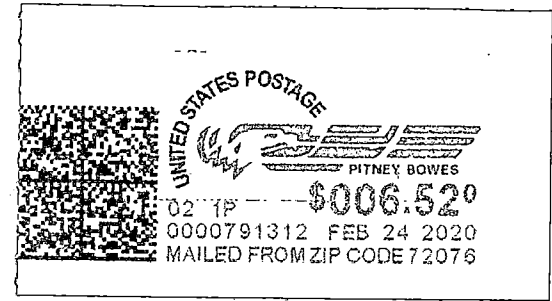
WQ - "Water Quality Levels not to exceed" OR actual permit limit.

Jacksonville Wastewater Utility
248 Cloverdale Road
Jacksonville, AR 72076

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