

# Jacksonville 2020 Pretreatment Program Annual Report

Yates, Adam

Thu 5/13/2021 4:07 PM

To:forrest@jwwu.com <forrest@jwwu.com>; mike@jwwu.com <mike@jwwu.com>;

Cc:Ramsey, David <RAMSEY@adeq.state.ar.us>; Healey, Richard <HEALEYR@adeq.state.ar.us>; Allen-Daniel, Leslie <ALLEN-DANIEL@adeq.state.ar.us>;

Forrest,

Jacksonville Wastewater Utility's Feb 2021 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 on this matter, please feel free to contact me.

Kindly,

**Adam Yates** | State Pretreatment Coordinator  
**Division of Environmental Quality | Office of Water Quality**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: (501) 682-0617 | e: [yates@adeq.state.ar.us](mailto:yates@adeq.state.ar.us)

## 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 22, 2021

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

Subject: 2020 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 2020.

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,

Forrest Lindsey  
Pretreatment Coordinator

ENCLOSURES

**JACKSONVILLE WASTEWATER UTILITY  
2020 ANNUAL PRETREATMENT PROGRAM STATUS REPORT (PPSR)  
FEBRUARY 22, 2021**

**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, 2020 and expires on December 31, 2022. 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 2020 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, 2021 and expires on December 31, 2023. The facility experienced no violation of their Industrial Wastewater Discharge Permit in 2020.

**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 Industrial Discharge Permit (IWDP) for this facility was renewed on February 11, 2020 and expires on February 11, 2023. Additionally the IWDP for this facility was modified May 8, 2020 to lengthen the timeline of interim limits to accommodate the continuing negotiations of the JWU & TPL partnership agreement. TPL experienced three violations of their IWDP in 2020 for zinc on the respective dates of 6/2/2020, 6/23/2020 & 12/2/2020 .TPL currently is in compliance with the IWDP.

**D. Sig Sauer LLC-** Sig Sauer is an ammunition facility. This facility manufactures and assembles ammunition from brass casings and lead projectiles. The Industrial Wastewater Discharge Permit (IWDP) was renewed on July 1<sup>st</sup>, 2020 and expires on June 30, 2023. Sig Sauer operates a pretreatment system consisting of a 1000 gallon Dump Tank, followed by bag filtration, a rinse tank, a mix tank and then a clarifier before being discharged to the JWU collection system. This facility experienced two violations of their IWDP in 2019. The first on 8/12/2020 for Copper, and the second on 12/16/2020 for Copper, Lead, & Zinc. Sig Sauer currently is in compliance with the IWDP.

**E. Sig Sauer II** –Sig Sauer II is a small arms ammunition facility. This facility manufactures projectiles for small arms, it utilizes an evaporator and does not discharge any process wastewater to the sanitary sewer. The Industrial Discharge Permit (IWDP) was issued on March 1<sup>st</sup>, 2020 and expires on March 31, 2023. 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 2020 and had a valid IWDP for spill and slug load protection and control.

### 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 for the pollutant parameters listed in the permit.

### 5. PRETREATMENT PERFORMANCE SUMMARY

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

### 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 throughout the city 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

None of Jacksonville Wastewater Utility's Industrial Users were in significant noncompliance with their IWDP for the year 2020.

**Attachment A**  
**CITY OF JACKSONVILLE NPDES PERMIT # AR0041335**  
**2020 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 1/1/2021	Y	N	1	4	N/A	N/A	C	C	C
Two Pine Landfill	4953	Noncategorical	Modified 5/12/2020	Y	N	1	4	N/A	N/A	C	C	C
Sig Sauer	3482	Categorical # 40 CFR 433	Renewed 7/1/2020	Y	N	1	10	N/A	N/A	C	C	C
Sig Sauer 2	3482	Categorical # 40 CFR 433	New 3/1/2020	Y	N	1	0	N/A	N/A	N/A	N/A	N/A

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

**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	2								C	
Two Pine Landfill		X	2								C	

- Sig Sauer had two Copper violations, 12/16/2020 & 8/12/2020
- Sig Sauer had one Lead violation, 12/16/2020.
- Sig Sauer had one Zinc violation, 12/16/2020.
- Two Pine Landfill had three Zinc Violations 6/2/2020 , 6/23/2020 & 12/2/2020

## 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>Forrest Lindsey</u>	Position	<u>Pretreatment Coordinator</u>
Contact Telephone Number	<u>(501) 982-0581</u>		
NPDES Permit Nos.	<u>AR 0041335</u>		
Reporting Period	<u>January 1, 2020 through December 31, 2020</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>	

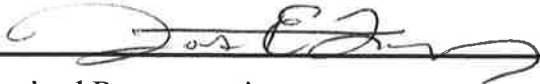


III. Compliance Monitoring Program			
1	No. of Control Documents Issued/Total No. Required	<u>3/3</u>	<u>2/2</u>
2	No. of Nonsampling Inspections Conducted	<u>3</u>	<u>2</u>
3	No. of Sampling Visits Conducted	<u>10</u>	<u>8</u>
4	No. of Facilities Inspected (nonsampling)	<u>3</u>	<u>2</u>
5	No. of Facilities 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>2</u>	<u>2</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

2/23/21  
 \_\_\_\_\_  
 Date

Forrest Lindsey, Pretreatment Coordinator

## Attachment D

## MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: JANUARY 1, 2020 TO DECEMBER 31, 2020

TREATMENT PLANT: City of JACKSONVILLE, AR NPDES PERMIT #AR0041335AVERAGE POTW FLOW: 5.33 MGD % IU FLOW: 14.3 %

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	Date	Date	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		2/25/2020	6/17/2020	8/21/2020	11/18/2020		2/25/2020	6/17/2020	8/21/2020	11/18/2020			
Antimony	N/A	N/D	N/D	N/D	N/D	N/A	N/D	N/D	N/D	N/D	60	200.8	60.
Cadmium	5.58	N/D	N/D	N/D	N/D	1.84	N/D	N/D	N/D	N/D	0.5	200.8	0.5
Copper	65.98	13.8	25.2	38	18.8	9.24	3.81	5.41	8.84	8.13	0.5	200.8	0.5
Lead	6.95	1.0	1.39	1.16	1.05	2.71	N/D	N/D	N/D	N/D	0.5	200.8	0.5
Mercury	0.03	0.0485	0.025	0.0475	.0432	0.01	.00405	.00688	0.00356	.00702	0.005	1631E	0.002
Nickel	76.74	4.13	5.53	5.16	7.23	96.96	2.58	4.49	5.74	6.81	0.5	200.8	0.5
Selenium	11.16	N/D	N/D	N/D	N/D	5.58	N/D	N/D	N/D	N/D	5	200.8	5.0
Silver	3.73	N/D	N/D	N/D	N/D	0.93	N/D	N/D	N/D	N/D	0.5	200.8	0.5
Zinc	167.71	75.4	109	113	90.5	85.53	34	35.2	60.5	63.1	20	200.8	20
Chromium	280.75	N/D	N/D	N/D	N/D	295.43	N/D	N/D	N/D	N/D	10	200.8	10
Cyanide	18.72	N/D	N/D	N/D	N/D	5.8	N/D	N/D	N/D	N/D	10	SM4500- CN C,E	10
Arsenic	12.79	1.26	1.18	1.26	1.49	348.96	0.632	0.888	1.14	1.22	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	--	--	--
Phenols	N/A	16.3	14.4	22.9	60.7	N/A	N/D	N/D	N/D	N/D	5	420.1	5
Beryllium	11.83	N/D	N/D	N/D	N/D	5.91	N/D	N/D	N/D	N/D	0.5	200.8	0.5
Thallium	N/A	N/D	N/D	N/D	N/D	N/A	N/D	N/D	N/D	N/D	0.5	200.8	0.5
Flow, MGD	N/A	7.09	3.76	2.66	2.80	N/A	7.46	3.86	2.72	2.64			
(3) Bis(2ethylhexyl) phthalate		N/A	N/A	N/D	N/D		N/A	N/A	N/D	N/A		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.