

Jacksonville Wastewater Utility



248 Cloverdale Road, Jacksonville, AR 72076
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February 27, 2024

Alan Anderson
Pretreatment and Enforcement Coordinator
Department of Energy & Environment
DEQ Office of Water Quality
5301 North Shore Drive
North Little Rock, AR 72118

Re: 2023 Annual Pretreatment Program Status Report – NPDES Permit AR0041335

Dear Mr. Anderson:

The enclosed documents are submitted pursuant to General Pretreatment Regulations, 40 CFR 403.12(i), and the requirements set forth in Jacksonville Wastewater Utility's (JWU) NPDES Permit AR0041335.

Upon preparation of this report, it was discovered that JWU failed to complete the treatment facility quarterly toxic pollutant monitoring for the period of October – December, as required by the referenced NPDES permit. In an effort of full transparency, Mike Overstreet, Operations Manager, contacted you on January 12, 2023 to report the omission. JWU has made efforts to remediate program failures and is currently receiving the assistance of Hawkins-Weir Engineers, Inc. in the management and improvement of our Pretreatment Program. We are committed to continued compliance with all state and federal requirements.

If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Thea Hughes". The signature is written in a cursive, flowing style.

Thea Hughes
General Manager

Enc.

JACKSONVILLE WASTEWATER UTILITY

2023 ANNUAL PRETREATMENT PROGRAM STATUS REPORT

FEBRUARY 27, 2024

Introduction

The Jacksonville Wastewater Utility (JWU) Industrial Pretreatment Program is responsible for the monitoring and enforcement of environmental regulations concerning wastewater discharges to the Dr. J. Albert Johnson Regional Treatment Facility. Potential industrial users are identified through the city's Privilege License Inspection Program, wherein all new businesses are required to submit documentation prior to opening. All waste streams are assessed for applicable pretreatment standards by JWU through their consultant, Hawkins-Weir Engineers, Inc (HW), and control documents are issued in the form of an Industrial Wastewater Discharge Permit (IWDP) for all industries identified as Significant Industrial Users (SIU). Oil/water interceptors, sand traps, and grease interceptors throughout the city and on the Little Rock Air Force Base (LRAFB) are monitored. The pretreatment program also monitors a healthcare provider's silver and mercury disposal practice.

Program Overview

There are currently six (6) permitted SIUs monitored by JWU's pretreatment program, of which three (3) are categorically regulated (INEOS, Sig Sauer, and Sig Sauer II). A brief description and status of each are detailed below:

A. INEOS Composites

This facility is a manufacturer of polyester resins, categorically regulated under 40 CFR 414. The facility does not discharge any process water to the sanitary sewer. Their No Discharge IWDP, last renewed on January 1, 2020, expired on December 31, 2023 and is under an administrative extension pending renewal. The permit prohibits the discharge of any process wastewater that would be regulated by 40 CFR 414 Subpart D – Thermoplastic Resins and has provisions for Slug Control and reporting requirements. This facility is aware that any non-domestic discharge must have prior approval and will result in a permit modification.

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 3,500 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, last renewed January 1, 2021, expired on December 31, 2023, and is under an administrative extension pending renewal.

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. TPL has a dedicated leachate pipeline that connects to the

JWU collection system upstream of the South Jacksonville Pump Station. The IWDP for this facility was renewed on February 13, 2023, and expires on February 13, 2026.

D. Sig Sauer LLC

Sig Sauer manufactures and assembles ammunition including brass casings and lead projectiles and is categorically regulated under 40 CFR 468. Their IWDP was renewed on July 1, 2023, and expires on June 30, 2026. The SIU operates a pretreatment system consisting of a 1000-gallon dump tank, bag filtration, a rinse tank, a mix tank, and a clarifier before discharge to JWU's collection system.

E. Sig Sauer II

Sig Sauer II is a small arms ammunition (projectiles) facility. This facility utilizes an evaporator to eliminate wastewater and does not discharge to the JWU collection system. Their IWDP was renewed on July 1, 2023, and expires on June 30, 2026. Their permit prohibits the discharge of any process wastewater categorically regulated by 40 CFR 433 and has conditions for spill control, monthly reporting, and process modification reporting requirements. This facility is aware that any non-domestic discharge must have prior approval and will result in a permit modification.

F. Unity Health Jacksonville

Unity Health Jacksonville is a recently renovated medical care facility that began operations under new ownership in 2023. Their IWDP was issued effective April 1, 2023, and is set to expire March 31, 2026.

Program Management

JWU experienced significant staffing challenges within the pretreatment department in 2023. The department was negatively affected by the departure of two pretreatment coordinators, and actively sought candidates for replacement after both instances. Following the departure of the most recent pretreatment coordinator, the utility became aware of deficiencies in the pretreatment program execution during 2023. The Utility no longer employs a pretreatment coordinator. Beginning in January 2024, JWU contracted the operation and management of the pretreatment program to Hawkins-Weir Engineers, Inc.

Reporting Requirements

The details of the required treatment facility influent and effluent monitoring are listed in the table below. Attachments A – C include the updated significant industrial users list, significant non-compliant industries list, and pretreatment performance summary.

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: JANUARY 1, 2023 TO DECEMBER 31, 2023
TREATMENT PLANT: CITY OF JACKSONVILLE, AR NPDES PERMIT #AR0041335
AVERAGE POTW FLOW: 5.00 MGD % IU FLOW: 16.5 %

METALS	MAHC (Total) (µg/l) (2)	Influent Dates Sampled (µg/l) Once/quarter			WQ level/ limit (µg/l) (2)	Effluent Dates Sampled (µg/l) Once/quarter			Laboratory Analysis		
		Date	Date	Date		Date	Date	Date	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		3/20/2023	6/27/2023	9/12/2023		3/20/2023	6/27/2023	9/12/2023			
Antimony	N/A	< 60.0	< 60.0	< 60.0	N/A	< 60.0	< 60.0	< 60.0	60	200.8	60
Cadmium	5.58	< 0.500	< 0.500	< 0.500	1.84	< 0.500	< 0.500	< 0.500	0.5	200.8	0.5
Copper	65.98	16.4	21.6	70.7	9.24	2.55	6.74	16.8	0.5	200.8	0.5
Lead	6.95	1.26	1.39	1.94	2.71	< 0.500	< 0.500	< 0.500	0.5	200.8	0.5
Nickel	76.74	3.14	8.58	8.07	96.96	3.49	6.78	7.51	0.5	200.8	0.5
Selenium	11.16	< 5.00	< 5.00	< 5.00	5.58	< 5.00	< 5.00	< 5.00	5	200.8	5
Silver	3.73	< 0.500	< 0.500	< 0.500	0.93	< 0.500	< 0.500	< 0.500	0.5	200.8	0.5
Zinc	167.71	66.5	101	148	85.53	40.4	51	78.8	20	200.8	20
Chromium	280.75	< 10.0	< 10.0	< 10.0	295.43	< 10.0	< 10.0	< 10.0	10	200.8	10
Arsenic	12.79	0.842	1.69	1.75	348.96	0.610	1.59	1.46	0.5	200.8	0.5
Beryllium	11.83	< 0.500	< 0.500	< 0.500	5.91	< 0.500	< 0.500	< 0.500	0.5	200.8	0.5
Thallium	N/A	< 0.500	< 0.500	< 0.500	N/A	< 0.500	< 0.500	< 0.500	0.5	200.8	0.5
Flow, MGD	N/A	6.60	3.46	2.56	N/A	6.6	3.46	2.56	N/A	N/A	N/A

MERCURY, CYANIDE and PHENOLS	MAHC (Total) (µg/l) (2)	Influent Dates Sampled (µg/l) Once/quarter				WQ level/ limit (µg/l) (2)	Effluent Dates Sampled (µg/l) Once/quarter				Laboratory Analysis		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/l)	EPA Method Used	Detection Level Achieved (µg/l)
		3/21/2023	6/28/2023	9/13/2023	--		3/21/2023	6/28/2023	9/13/2023	--	(1)	(1)	(µg/l)
Phenols	N/A	26	283	45.8		< 5.00	11.8	< 5.00		5	420.1	5	
Cyanide	18.72	< 10.0	< 10.0	< 10.0		< 10.0	< 10.0	< 10.0		10	SM4500- CN,B,C,E	10	
Mercury	0.03	0.0065	0.0067	0.0132		< 0.0005	< 0.0005	< 0.0005		0.0005	1631E	0.0005	
Flow, MGD	N/A	6.58	3.50	2.54		6.58	3.50	2.54		N/A	N/A	N/A	

(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
PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	SIC/NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (N/A, C, NC, or SNC)				Permit Limits (denote parameter violated & number of times)
			Y/N	Last Action				Reports			Self Monitoring	
								BMR	90-day Compliance	Semi Annual		
INEOS Composites US LLC	2821/325211	414	Y	Renewed 1/1/2020	N	1	N/A (No Discharge)	Not Required	Not Required	Not Required	C	N/A (No Discharge)
Little Rock Air Force Base	9711/92811	N/A	Y	Renewed 1/1/2021	N	0	9	Not Required	Not Required	Not Required	C	C
Two Pine Landfill	4953/562212 & 562219	N/A	Y	Renewed 2/13/2023	N	0	11	Not Required	Not Required	Not Required	C	Zinc, 1X (1/24/23)
Sig Sauer	3482/332992	468	Y	Renewed 7/1/2023	N	1	12	Not Required	Not Required	Not Required	Not Required	Copper, 2X (3/22/23) (9/15/23)
Sig Sauer 2	3482/332992	433	Y	Renewed 4/1/2023	N	0	N/A (No Discharge)	Not Required	Not Required	Not Required	Not Required	N/A (No Discharge)
Unity Health Jacksonville	8062	N/A	Y	New 4/1/2023	Y	0	0	Not Required	Not Required	Not Required	Not Required	C

Include NAICS code(s)
3rd column – include the CFR # only if the Category has Pretreatment Standards (numeric or narrative)

ATTACHMENT C

PRETREATMENT PERFORMANCE SUMMARY (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY ADEQ. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT DEPARTMENT AUTHORIZATION.

I. General Information

Control Authority Name Jacksonville Wastewater Utility

Address 248 Cloverdale Road

City Jacksonville State/Zip AR 72076

Contact Person Mike Overstreet Position Operations Manager

Contact Telephone 501-982-0581 NPDES Permit Nos. AR0041335

Reporting Period January 1, 2023 December 31, 2023

(Beginning Month, day and Year) (Ending Month, day and Year)

Total Number of Categorical IUs Three (3)

Total Number of Significant Noncategorical IUs Three (3)

Total Number of Non-Significant (yet permitted) IUs Zero (0)

II. Significant Industrial User Compliance

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of SIUs Submitting BMRs/Total		
No. Required.	<u>0/0</u>	<u>N/A*</u>
2) No. of SIUs Submitting 90-Day Compliance		
Reports / No. Required.	<u>0/0</u>	<u>N/A*</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>0/3</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>0%</u>	

III. Compliance Monitoring Program

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued / Total No. Required.	<u>0/0</u>	<u>1/1</u>
2) No. of Non-sampling Inspections Conducted / Total No. Required.	<u>2/3</u>	<u>0/3</u>
3) No. of Sampling Visits Conducted / Total No. Required.	<u>12/12</u>	<u>15/3</u>
4) No. of Facilities Inspected (nonsampling) / Total No. Required.	<u>2/3</u>	<u>0/3</u>
5) No. of Facilities Sampled / Total No. Required.	<u>1/1</u>	<u>3/3</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
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>1</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 (not surcharges) Collected (total dollars/IUs assessed)	<u>0/0</u>	<u>0/0</u>

I certify that the information contained herein is complete and accurate to the best of my knowledge.

Ilea Hughes, General Manager
Authorized Representative

Date 2-27-24

Alan Anderson (adpce.ad)

From: Alan Anderson (adpce.ad)
Sent: Wednesday, April 24, 2024 8:44 AM
To: 'mike@jwwu.com'; 'thea@jwwu.com'
Cc: 'ashley.ferguson@hawkins-weir.com'
Subject: AR0041335-January 1, 2023 through December 31, 2023 Pretreatment Program Annual Report

The Jacksonville Wastewater Utilities January 1, 2023 through December 31, 2023 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 C.F.R. § 403.12(i).

DEQ confirms that Jacksonville Wastewater Utilities contacted the Office of Water Quality on January 12, 2024 to discuss deficiencies in the report and corrective actions taken to eliminate those deficiencies.

If you have any questions, please feel free to contact me.

Alan Anderson, MPA | Pretreatment and Enforcement Coordinator
**Division of Environmental Quality | Office of Water Quality
Enforcement Section**
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