

# ADEQ

ARKANSAS  
Department of Environmental Quality

**APR 17 2013**

Kevin McGill, Pretreatment Coordinator  
Jacksonville Wastewater Utility  
248 Cloverdale Road  
Jacksonville, Arkansas 72076

Re: City of Jacksonville (AFIN 60-00543 NPDES #AR0041335) Pretreatment Program  
Audit/Municipal Pollution Prevention (P2) Assessment

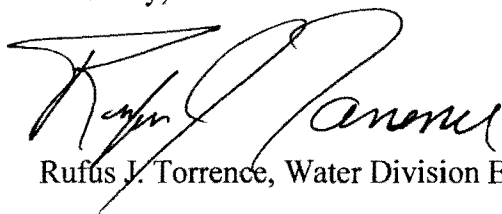
Dear Mr. McGill:

Please find enclosed the finished report for the audit/assessment conducted March 19 through March 21, 2013. The report should be made available for review to appropriate industrial officials. You and the POTW staff should discuss and evaluate the findings in this report. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

The Department appreciates your assistance. Everyone appeared very interested in both the Pretreatment and Pollution Prevention Programs. Most of the recommendations in the attached audit/assessment are intended to aide the City of Jacksonville pretreatment program with achieving the objectives of the Clean Water Act.

Please do not hesitate to contact the Department if the City has questions or concerns.

Sincerely,



Rufus J. Torrence, Water Division Engineer

Encl: Audit/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)  
Jason Bolenbaugh / ADEQ Branch Manager-Field Services (w/o attmt)  
Craig Uyeda / ADEQ Branch Manager-Enforcement (w/o attmt)

***PRETREATMENT PROGRAM AUDIT***

***POLLUTION PREVENTION ASSESSMENT***

***JACKSONVILLE, ARKANSAS***

***NPDES PERMIT #AR0041335***

***APRIL 15, 2013***

***AUDITOR: RUFUS TORRENCE***

***WATER DIVISION ENGINEER II***

***ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY***

***5301 Northshore Drive***

***NORTH LITTLE ROCK, ARKANSAS 72118***

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- B) Summary of Findings with Required Actions
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## **LIST OF ATTACHMENTS**

### Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summary

### Attachments: Supporting Documentation

- A - Application for Industrial Waste Permit-Ashland
- B - Discharge Permit-Ashland (Two Pines & LRAFB)
- C - Industrial Inspection Report-Ashland
- D - Self Monitoring Report-Ashland
- E - Influent Monitoring Results for WWTP
- F - Conventional Pollutant Loadings
- G - ICIS Violation Report-WWTP
- H - WET Summary-WWTP
- I - Original List of SIUs from 1983 Program
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- K - Crist Eng Jan 1997 Report Excerpts
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**A) INTRODUCTION**

Synopsis: Under Arkansas Department of Environmental Quality (ADEQ or Department) responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

With Pollution Prevention (P2) being integrated into Pretreatment Programs, the auditor also assessed the city's P2 projects.

The auditor performed from March 19 through 21, 2013 an assessment of the Pretreatment Program implemented by the City of Jacksonville, Arkansas.

Participants included:

Rufus Torrence	ADEQ/Engineer & Auditor
Kevin McGill	City of Jacksonville / Pretreatment Coordinator
Sam Zehtaban	City of Jacksonville / Administrative Operations Manager
Thea Hughes	City of Jacksonville / General Manager

The goals of the audit/assessment were:

- \* To determine the implementation and compliance status of the City of Jacksonville's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403.
- \* To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges.
- \* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements.
- \* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.



Discussion: The City of Jacksonville Pretreatment Program was originally approved on February 3, 1984. The City has submitted three program modifications to the Department. The Department approved the three modifications and incorporated the modifications into the City's NPDES permit on May 30, 1991, November 2, 2000 and August 1, 2010. The last modification upgraded the pretreatment program to comply with the Streamlining Rule to 40 CFR Part 403 promulgated on October 14, 2005.

The original program controlled ten (10) Significant Industrial Users (SIUs). Refer to Attachment I-2/2 for a list of the original SIUs. Presently, the City has listed ten (10) SIUs. The main purposes of this audit is to (1) verify which Users are SIUs and which Users should be designated as Non-Significant Industrial Users (NSIUs) [refer to requirements B-1&2 below] and (2) recommend permit elements (BMPs and TBLL/PBLL) to control pollutant loadings [refer to recommendations C-4,6 &7 below].

In accordance with 40 CFR 403.8(f)(2)(viii) and paragraph 7.d (NPDES Permit AR0041335, Page 5 of Part II), the City must publish annually a list of SIUs in the local newspaper that were in significant noncompliance (SNC) during the preceding twelve months. Therefore, the Department reviewed each Industrial User listed on the City's 2012 Annual Report to confirm the correct designation.

The Jacksonville Johnson Wastewater Treatment Plant processes include oxidation ditches, return activated sludge, aeration, clarification, and gravity sludge thickening with a belt filter press. Final polishing consists of gravity dual-media filtration followed by ultraviolet disinfection. The effluent is discharged into the Bayou Meto creek. The POTW did not have any discharge violations since the last audit (see Attachment G). Even though the POTW effluent has shown no pattern of toxicity to this receiving stream, in February 2012 the effluent had sub-lethal effects on the *Pimephales promelas* (fathead minnow). The facility passed the required monthly retests in March and April of 2012 (see Attachment H).

The plant design flow is 12 MGD but the average flow was about 4.5 MGD for the previous year. A federal facility (Little Rock Air Force Base) contributes about 20% of the average daily flow while the other SIUs contribute less than 1 % of the average daily flow. Numerical local limits appear unnecessary for the SIUs. However, BMPs can not only preserve pollutant loadings to the POTW at current levels but also help reduce pollutant loadings in the future.

The audit consisted of informal discussions with the City's Pretreatment personnel, examination of SIU files, the pretreatment records at the treatment plant and, finally, site visits to the SIUs. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachments A through M.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City of Jacksonville. Section C includes recommendations to help improve the City's implementation and enforcement of the Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

**B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS**

This section of the report is a summary of deficiencies found in the City of Jacksonville Pretreatment Program. The auditor has paraphrased with CFR citations the actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program. A narrative explanation of the finding will follow.

1) Under **40 CFR 403.3(j)**, *“The term Industrial User or User means a source of Indirect Discharge.”* Under **40 CFR 403.3(i)**, *“...Indirect Discharge or Discharge means the introduction of pollutants into a POTW from any non-domestic source...”*. Furthermore, Part 403—General Pretreatment Regulations for Existing and New Sources of Pollution Purpose and Applicability found in §403.1(b) limits pollutants to those *“from non-domestic sources...transported by truck...”*.

The General Pretreatment regulations apply only to non-domestic wastewater (process wastewater from industrial sites, chemical toilets, etc). Since septic haulers transport only domestic wastewater to POTWs, these haulers are considered residential/household customers and are not considered “industrial users or users”. Hence, domestic septic haulers cannot be designated as Significant Industrial Users (SIUs).

The City listed “Avery Septic Tank Cleaning” and “Best Toilet’s” as SIUs in the 2012 Annual Report. These domestic septic haulers must not be listed as SIUs in future annual reports. The City may continue to permit them as Non-Significant Industrial Users (NSIUs).

2) Under 40 CFR 403.3(v)(ii), the Control Authority (the City) can designate any user as a SIU that *“has reasonable potential for adversely affecting the POTW’s operation or violating any Pretreatment Standard or requirement...”*.

The City listed “Wallace Pressure Washing” as a SIU in the 2012 Annual Report. This facility washes school buses and the wastewater from this facility does not have reasonable potential to cause pass-through or interference. In addition, this facility did not discharge any process wastewater to the POTW during the previous pretreatment year. Consequently, “Wallace Pressure Washing” should not be listed as a SIU in future Annual Reports. The City may continue to permit this facility as a NSIU.

The City listed “Arkansas Portable Toilets” and “Metro Portable Toilets” as SIUs. If these Users do not have the reasonable potential to cause pass-through or interference, the City should not list them as SIUs. For national and statewide consistency, the City should designate portable chemical toilet haulers as NSIUs. Refer page 4-8 in EPA *Guidance Manual for Control of Wastes Hauled to Publicly Owned Treatment Works* and find that these haulers were designated as “non-SIUs”. Refer to Attachment J and find a list of all SIUs in Arkansas. Jacksonville is the only City to list septic haulers as SIUs.

**C) RECOMMENDED POTW ACTIONS FOR IMPROVED IMPLEMENTATION OF THE PRETREATMENT AND POLLUTION PREVENTION PROGRAMS**

1) The City should sample the potable water entering the LRAFB from time to time for Table III parameters. The sampling point should be as close as possible to custody transfer (at the base water meter). Referring to Recommendation 3 below, after the City takes ownership, the City may cease sampling potable water entering the base.

2) Based on the 2012 Annual Report, local limits for metals and cyanide appear unnecessary at this time. Even though the receiving stream (Bayou Meto; HUC 8020402; Reach 007B) is impaired for a Priority Organic (Dioxin), Lead and Copper (Category 5d), no municipality was indicated as a source of the impairment according to the 2008 303(d) list. In addition, based on the present conventional pollutant loadings (See Attachment F) and Crist Eng Jan 1997 report (See Attachment K), local limits for BOD, TSS and NH<sub>3</sub>-N also appear unnecessary. For example, the design load for BOD (See Attachment K) is 14373.2 lbs/day (12.31 MGD X 140 mg/l X 8.34) while the average CBOD loading is only 5104.0 lbs/day.

3) If the City plans to take ownership of the collection system on the LRAFB, the existing sampling point will no longer be applicable. The City will need to permit and sample all non-domestic wastewater sources on the base, which fall under the definition of SIU according to 40 CFR 403.3(t), at a point prior to the wastewater entering the collection system (part of the POTW). The City also has the option to designate facilities on the base as NSIUs.

4) The current local limits for the Johnson plant were developed in 1994 and provide virtually no control over the existing SIUs. The 1994 limits were based on the MAHLs (Maximum Allowable Headworks Loadings) for each pollutant-of-concern (metals and cyanide). Currently, all the SIUs in Jacksonville discharge close to typical domestic levels. Since the current local limits are based on 1994 MAHLs, the local limits will allow the SIUs to load the POTW to the point of violating water quality standards and/or turning the sludge into a hazardous waste. For example, according to the 2012 Annual Report (Attachment M-1/1) the present copper loading is about 1.5 lbs/day  $[(0.019+0.045+0.044+0.058)/4] \text{ mg/l} \times 4.34 \text{ MGD} \times 8.34$ . The LRAFB is presently discharging at domestic levels and contributes about 0.48 lbs/day (0.058 mg/l X 1.0 MGD X 8.34) of copper to the POTW. The LRAFB's permit (#87-08-12) allows the base to discharge 2.094 lbs/day (Attachment B-13/18) of copper. If the base were to discharge at the allowable loading, the copper loading at the POTW would more than double to over 3.0 lbs/day. At 3.0 lbs/day copper loading to the POTW and a removal efficiency of 86%, the copper concentration in the effluent will increase to over 11.0 µg/l  $[(3.0 \text{ lbs/day} \times (1-0.86))/(4.34 \text{ MGD} \times 8.34)]$ . The WQS for copper is only 9.7 µg/l (Attachment L-2/2). Furthermore, the base is currently discharging nickel at domestic levels, too. However, the LRAFB's permit allows the facilities on the base to discharge nickel up to 3.095 lbs/day (Attachment B-13/18) to the POTW. At 3.2 lbs/day of nickel entering the POTW, the sludge could potentially become a hazardous waste (Attachment L-2/2). BMPs can help preserve the current loadings to the POTW.

5) The Streamlining regulations promulgated on October 14, 2005 stated that BMPs (when properly approved by ADEQ and incorporated into SIU permits) are considered local limits and Section 7.b (Page 4 of Part II, NPDES Permit #AR0041335) state that BMPs shall be considered local limits and Pretreatment Standards. Hence, BMPs incorporated into SIU permits are not only enforceable by local law but also by state and federal law. The City should consider implementing BMPs to control the existing SIUs and maintain the headwork loading at its present level.

6) The auditor and the City pretreatment coordinator visited three SIUs on Wednesday (March 20, 2013). The auditor lists below some BMP language which may be incorporated into the three SIU permits:

+++++

**Best Management Practices as Local Limits**

*(Language for LRAFB Permit)*

1) The management and operational procedures listed in paragraph 4 below are intended to preserve pollutants-of-concern loading to the POTW. Pollutants-of-concern include (but are not necessarily limited to), BOD, CBOD, TSS, Ammonia, Table II and Table III parameters (Appendix D, 40 CFR 122).

2) The SIU must maintain all procedures listed below at its Jacksonville facility to preserve the pollutants-of-concern loading to the POTW at levels documented by the SIU in the last report (or at levels mutually agreed upon by the Manager [Ord #1360; §13.24.03(27)] and the SIU) to City prior to the effective date of this permit. In general, except in situations explained below, the BMPs developed, implemented, and updated must be as stringent as necessary to ensure that the discharges do not cause or contribute to a significant increase in pollutants-of-concern loadings to the POTW.

3) At any time after authorization, the Manager may determine that the facility discharges may cause, have reasonable potential to cause, or contribute to a significant increase in the pollutant-of-concern loadings to the POTW. If such a determination is made, the Manager will require the SIU to:

- a. Develop a supplemental BMP action plan describing modifications to address adequately the identified increased loadings concerns and submit valid and verifiable data and information that are representative of the SIU’s discharge and indicate that the facility discharge is attaining the pollutant-of-concern levels at or below the levels documented on the effective date of this permit; or
- b. Cease discharges of all non-domestic wastewater.



4) Best Management Practices for LRAFB

a. Requirements

- 1. The base must continue to wash aircraft in hangers currently approved by the Manager. The base must not change soap or other wash aids without the approval of the Manager.
- 2. The base must continue to capture and occasionally sample and test the wastewater from floor cleaning operations in the corrosion control hangers. The base must not change corrosion control techniques (to include type of paint, painting techniques, etc) without the approval of the Manager.
- 3. The base must continue to purchase materials and supplies for the dye-penetrant nondestructive inspection operation which do not contain Table II or Table III pollutants. The base must not change process inspection constituents without the approval of the Manager.

b. Recommendations

- 1. The base should switch from wet x-ray processing operations in the NDI lab to dry digital procedures.

*(Language for Ashland Specialty Chemicals Permit)*

4) Best Management Practices for Ashland

a. Requirements

- 1. The facility must continue to vaporize the by-products (water, etc.) from the process operations.
- 2. The facility must continue to capture all wastewater (sanitary, et.al.) in a tank onsite prior to discharging the wastewater to the city collection system.

b. Ashland Permit Recommendations  
(Reserved)

*(Language for Two Pines Permit)*

4) Best Management Practices for Two Pines

a. Requirements

- 1. The landfill must continue to employ and maintain the 60 mil HDPE (High Density Polyethylene) liner above 1 foot of an earth layer and below two feet of an earth layer on permanently closed areas of the landfill.
- 2. The landfill must continue to cover exposed areas of the site when these areas are temporarily inactive.

b. Two Pines Permit Recommendations  
(Reserved)

+++++

The language above is presented as an example and may be incomplete. The City should consult with each SIU to ensure that all applicable procedures are maintained to prevent the wastewater pollutants-of-concern from increasing in the future. Furthermore, the City may also set goals (recommendations in the BMP) to reduce pollutant loading to the POTW.

Finally, in accordance with 40 CFR 403.12(h), at least once every six months, each SIU with a BMP must submit a report with sampling and analysis to the City to verify that the pollutant loadings from the SIU continue at the previous levels or decreases. The report is not required if the City performs the sampling and analysis and makes the determination.

7) If the City decides to include BMPs in SIU permits, the City should allow each SIU with a proposed BMP the opportunity to comment before issuing the permits. If the City does incur a problematic SIU which contests the BMP or whose loading to the POTW increases significantly after the BMPs become effective, the City may consider Performance Based local limits (PBLL) to control the problematic SIU. PBLLs are based on the historical data of the SIU's effluent and the City can consider only the monitoring data submitted before the loadings increased significantly. Finally, the City has the option to implement both BMPs and PBLLs for all SIU permits at this time before discontinuing the 1994 local limits.

8) The City is presently using a hybrid application document (combination of short application form with IU Survey/BMR forms). The City should consider replacing the hybrid application form with EPA new application form. See Appendix C in "*EPA Industrial User Permitting Manual; September 2012*". If the City decides to use BMPs to control SIUs, the new application form may be particularly helpful. The new form contains all of the Streamlining updates to include a section on BMPs (see section J in the form). Attached to an email dated March 25, 2013, the Auditor sent the City Pretreatment Coordinator a copy of the new manual and application form.

#### **D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS**

The City should consider the required actions and recommendations contained in this audit/assessment before finalizing any pretreatment program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, should be submitted to ADEQ for review and approval.

# PRETREATMENT AUDIT CHECKLIST

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information ..... Pages 1- 4  
 Section II: Pretreatment Program Analysis ..... Pages 5-17  
 Section III: Industrial User File Evaluation ..... Pages 18-25

### SECTION I: GENERAL INFORMATION

**A. GENERAL INFORMATION**

Control Authority Name: City of Jacksonville NPDES #: AR0041335  
 Mailing address: 248 Cloverdale Road Jacksonville, AR  
 Permit Signatory: Thea Hughes Title: General Manager  
 Telephone: (501) 982-0581 FAX NUMBER: (501) 982-5791

Pretreatment Contact: Kevin McGill Title: Pretreatment Coordinator  
 Address: Same  
 Telephone: Same E-Mail address: kevin@jvwu.com

Pretreatment program approval date: 2-3-84

Dates of approval of any substantial modifications: 05-30-91, 11-02-00 & 08-01-10

Month Annual Pretreatment Report Due: February

Pretreatment Year Dates: Jan 1 - Dec 31 Date(s) of Audit: 03/19-21/2013  
 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
<u>Rufus Torrence</u>	<u>Engineer II / ADEQ</u>	<u>(501) 682-0626</u>

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
<u>*Kevin McGill</u>	<u>Pretreatment Coordinator</u>	<u>(501) 982-0581</u>
<u>James Patrick Ellis</u>	<u>Laboratory Technician</u>	"
<u>Sam Zehtaban</u>	<u>Administrative Ops. Manager</u>	"
<u>Thea Hughes</u>	<u>General Manager</u>	"

\* Program Primary Contact

Dates of Previous PCIs/Audits:		
TYPE	DATE	DEFICIENCIES NOTED

YES NO

      Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action:

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      Is the Control Authority currently in SNC or RNC?

---

.....

The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with an asterisk or footnote that tells that there is more explanatory information and where it can be found.

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
<u>*AR0041335</u>	<u>J Albert Johnson Regional</u>	<u>11/01/12</u>	<u>10/31/17</u>

\* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Johnson  
 Location Address: 248 Cloverdale Road

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 12.31 MGD; Actual (Average)- 5.9 MGD

Sewer System: 100 % Separate; 0 % Combined, # of CSOs

Industrial Contribution to this Treatment Plant

# of SIUS : 3 # of CIUS : 1  
 Industrial Flow (mgd): 0.12 Industrial Flow (%) : 2 %

Level of Treatment Type of Process(es):

Primary  Oxidation ditches, return activated sludge  
 Secondary  Aeration, clarification, DAF or gravity sludge thickening  
 Tertiary  Gravity dual-media filtration

Method of Disinfection: Ultraviolet

Dechlorination  YES  NO

Effluent Discharge

Receiving Stream Name: Bayou Meto

Receiving Stream Classification: Seq. #3B in Ark. River Basin

Receiving Stream Use: Fishable/Swimmable; primary/secondary contact

If effluent is disposed of to any location other than the receiving stream, please note: \_\_\_\_\_

Method of Sludge Disposal: Quantity of Sludge\*:

<input type="checkbox"/> Land Application	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Monofill	<u>158</u> dry tons/yr.
<input checked="" type="checkbox"/> Mun. Solid Waste Landfill	<u>776</u> dry tons/yr.
<input type="checkbox"/> Public Distribution	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Lagoon Storage	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Other (specify)	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Total Sludge Production	<u>934</u> dry tons/yr.

\*Quantities from EPA Envirofacts report

List of toxic pollutant limits in NPDES permit: (Permit currently pending)

**SECTION I: GENERAL INFORMATION**

a. (continuation of individual treatment plant information for Treatment Plant.)

YES NO Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: ADEQ NPDES Permit AR0041335 Part III para 3  
 Issuance Date: Nov 01, 2012  
 Expiration Date: Oct 31, 2017

List pollutants that are specified in current sludge permit:  
City must comply with requirements in 40CFR503

YES NO N/A  
   Has the Control Authority submitted results of whole effluent biological toxicity testing.  
   Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?)

How many times were the following monitored during the past pretreatment year?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	-----	-----
Priority **	<u>1</u>	<u>1</u>	-----	-----
Biomonitoring	-----	<u>4</u>	-----	-----
TCLP	-----	-----	<u>1</u>	-----
Other:	-----	-----	-----	-----

\* As identified at 40 CFR 122, Appendix D, Table III, \*\* As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.  
Stayed the same over the last 5 years

YES NO N/A  
   Has the POTW begun tracking the trends in the above samples?  
   Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated Cause(s)  
None

YES NO  
  Has the treatment plant sludge violated the TCLP Test?

SECTION I: GENERAL INFORMATION

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]

Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.  
The CA has updated the approved program to comply with the "Streamlining Revisions" to 40CFR403

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
07-31-2010	Streamlining Update	08-01-2010

2. Modifications in Progress:

Date Requested	Nature of Modification
None	

YES NO

Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:

N/A Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

D. Legal Authority [403.8(f)(1)]

Date of original Pretreatment Program approval: 2/3/1984 [ICIS-RIDE]  
 Date of most recent Ordinance approved by the Control authority: 02/05/2009  
 Date of most recent Pretreatment Program modification approval: 07/31/2010

Does the Control Authority's legal authority enable it to:  
 [403.8(f)(1)(i-vii)]

YES NO

- Deny or condition pollutant discharges [§§13.24.09 & 13.24.12]
- Require compliance with standards [§§13.24.10 & 13.24.11]
- Control discharges through permit or similar means [§13.24.18]
- Require compliance schedules and IU reports [§13.24.18.5.f & g]
- Carry out inspection and monitoring activities [§§13.24.20 & 13.24.21]
- Obtain remedies for noncompliance [§§13.24.28 & 13.24.29]
- Comply with confidentiality requirements [§13.24.22]
- Establish Pollution Prevention [Ord #1360, Preamble paragraph g]
- Has the city developed and adopted a Pollution Prevention policy?  
 [Narrative Page 3, Program Objectives para 6]

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

- No oversight authority
- No inspection authority
- No remedies for noncompliance
- No "equivalent" standard
- No clear delineation of responsibility for program implementation
- Interjurisdictional agreements not entered into
- Other, Specify: \_\_\_\_\_

Are all industrial users located within the jurisdictional boundaries of the Control Authority? **LRAFB is located in boundaries but has legal agreement with the City.**

Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions? **LRAFB Contract signed 6/82**

Have provisions been made for the incorporation of Pollution Prevention (P<sup>2</sup>) policies by contributing jurisdictions?

List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1. <u>Little Rock Air Force Base</u>	<u>0</u>	<u>0*</u>	<u>Contract &amp; Permit</u>
2. _____	_____	_____	_____

\*The LRAFB is considered a single SIU

If relying on activities of contributing jurisdictions, indicate which activities are performed by jurisdictions and describe any problems in their implementation. N/A

Problems

- Updating industrial waste survey \_\_\_\_\_
- Notification of IUs \_\_\_\_\_
- Permit issuance \_\_\_\_\_
- Receipt and review of IU reports \_\_\_\_\_
- Inspection and sampling of IUs \_\_\_\_\_
- Assessment of IUs for P<sup>2</sup> activity \_\_\_\_\_
- Analysis of samples \_\_\_\_\_
- Enforcement \_\_\_\_\_
- Other: \_\_\_\_\_

Briefly describe other problems: None

Identify any IUs that have caused problems of interference, upset, pass through, sludge contamination, problems in the collection system, or worker health and safety in the past 12 months:

IU Name	Problem	NPDES Permit Violation	
		Yes	No
<u>None</u>	_____	_____	_____
_____	_____	_____	_____



SECTION II: PROGRAM ANALYSIS AND PROFILE

E. Industrial User Characterization [403.8(f)(2)(i)]

- YES NO Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
- If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> activity?
- Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]  
*See Page 6 in Program Description (Updating The Industrial User Survey)*
- If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P<sup>2</sup> activity and the distribution of P<sup>2</sup> reference materials to the IUs which qualify? Exhibit G page 3; section B.5

What methods are used to update the IWS:

- Review of newspaper/phone book
- Review of plumbing/building permits
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) City Privilege Tax Inspection<sup>1</sup>

How often is the survey to be updated? Ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: No

<sup>1</sup>The CA Pret Cor must sign off on all new business as a prerequisite for doing business in Jacksonville. See Attachment Q for JWWU Privelege License Inspection Report.

YES NO

- Have any new SIUs been identified within the last 12 months? If yes:

<u>Name of IU</u>	<u>Type of Industry</u>	<u>Is the IU Permitted?</u>

How many IUs are currently identified by the Control Authority in each of the following groups:

- a. 3 SIUs (As defined by the Control Authority) [ICIS-RIDE]
- b. 1 Categorical Industrial Users (CIUs) [ICIS-RIDE]
- c. 0 Noncategorical SIUs
- d. 3 Other regulated nonsignificant IUs (Describe) septic haulers
- 6 TOTAL of a. + d.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

- \_\_\_ Has the POTW identified any IUs with Pollution Prevention opportunities?
- \_\_\_ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1-3)]

If not, the Control Authority has defined "significant industrial user" to mean:

---

F. Control Mechanism Evaluation [403.8(f)(1)(iii)]

YES NO

- \_\_\_ Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

Describe the Control Authority's approved control mechanism (e.g., permit, etc.): Permit

What is the maximum term of the control mechanism? 5 years

- 0 \_\_\_ How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [ICIS-RIDE] If there are any SIUs without current (unexpired) permits, please complete the information below:

IU NAME	PERMIT EXPIRATION DATE

YES NO

- \_\_\_ Does the Control Authority accept trucked septage wastes?
- \_\_\_ Does the Control Authority accept other trucked wastes?
- \_\_\_ Does the Control Authority have a control mechanism for regulating trucked wastes?

If yes, answer the following:

- |                                     |                          |                                                                                      |
|-------------------------------------|--------------------------|--------------------------------------------------------------------------------------|
| <u>YES</u>                          | <u>NO</u>                |                                                                                      |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Does Control Mechanism designate a discharge point? [403.5(b)(8)]                    |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Are all applicable categorical standards and local limits applied to trucked wastes? |

List all pollutants and applicable limits, other than local limits and categorical standards applied to waste haulers (**not Septic Waste Haulers**):

Pollutant	Limit*
<u>BOD5</u>	<u>250 mg/l</u>
<u>TSS</u>	<u>250 mg/l</u>
<u>O&amp;G</u>	<u>100 mg/l</u>

\*Exceedance of these limits are not considered a violation of Ord #1360 unless they cause Pass Through or Interference or cause the headworks to exceed these limits. Exceedance of these limits are subject to surcharges.

Describe the discharge point(s) (including security procedures):

Vault prior to the headworks or in the storage basin

---

- \_\_\_ Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Does the Control Authority have a control mechanism for regulating wastes from UST sites?

List all pollutants and applicable limits, other than local limits and categorical standards applied to UST cleanup sites:

Pollutant	Limit
N/A	

G. Application of Pretreatment Standards and Requirements

YES NO

Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

Date Notified Letter Method of Notification

How does the Control Authority keep abreast of current regulations to ensure proper implementation of standards?

- |                                                         |                                                              |
|---------------------------------------------------------|--------------------------------------------------------------|
| <input type="checkbox"/> Federal Register               | <input checked="" type="checkbox"/> Journals, Newsletters    |
| <input checked="" type="checkbox"/> Meetings, Training  | <input checked="" type="checkbox"/> Internet                 |
| <input checked="" type="checkbox"/> Government Agencies | <input checked="" type="checkbox"/> Other <u>Listservers</u> |

YES NO

Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit, or Annual Report?

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [ICIS-RIDE] [403.5(c)(1); 403.8(f)(4)]

	Headworks Analysis Completed? <sup>2</sup>		Local Limits Needed? <sup>4</sup>		Local Limits Adopted?		Numerical MAHC Limit Adopted <sup>3</sup> (µg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓	---	---	?	✓	---	-----
Cadmium (Cd)	✓	---	---	?	✓	---	5.58
Chromium-Total	✓	---	---	?	✓	---	280.75
Copper (Cu)	✓	---	---	?	✓	---	65.98
Cyanide (CN)	✓	---	---	?	✓	---	18.72
Lead (Pb)	✓	---	---	?	✓	---	6.95
Mercury (Hg)	✓	---	---	?	✓	---	0.03
Molybdenum (Mo) <sup>1</sup>	✓	---	---	?	✓	---	11.51
Nickel (Ni)	✓	---	---	?	✓	---	76.74
Selenium (Se) <sup>1</sup>	✓	---	---	?	✓	---	11.16
Silver (Ag)	✓	---	---	?	✓	---	3.73
Zinc (Zn)	✓	---	---	?	✓	---	167.71
BOD <sub>5</sub>	---	---	---	✓	---	---	-----
TSS	---	---	---	✓	---	---	-----
NH3-N	---	---	---	✓	---	---	-----

- 1 - If necessary for the sludge disposal option chosen.
- 2 - ADEQ performed MAHL analysis for City for annual reports
- 3- Sect 13.24.12 of Ord No. 1360 incorporates Local Limits by reference. Refer to ADEQ TBLL2008 Development for source of MAHCs.
- 4. Based on the 2012 Annual Report, local limits for metals and cyanide appear unnecessary at this time. Even though the receiving stream (Bayou Meto) is impaired for Priority Organics and Copper, no municipality was listed as a source of the impairment according to the 303(d) list. In addition, based on the present conventional pollutant loadings and Crist Eng Jan 1997 report, local limits for BOD, TSS and NH3-N also appear unnecessary. For example, the design load for BOD (Attachment K) is 14373.2 lbs/day (12.31 MGD X 140 mg/l X 8.34) while the average CBOD loading is only 5104.0 lbs/day (Attachment F). The City currently has no point sources for organic loadings and BMPs may not help at this time.

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

POLLUTANT	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
<u>N/A</u>	---	---	---	---	---	---	-----
_____	---	---	---	---	---	---	-----
_____	---	---	---	---	---	---	-----
_____	---	---	---	---	---	---	-----
_____	---	---	---	---	---	---	-----
_____	---	---	---	---	---	---	-----

YES NO

Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

What method of allocation was used for local limits for each pollutant that has a local limit in-place?

	TYPE OF ALLOCATION		
	Uniform Concentration*	Mass	Hybrid
Arsenic (As)	<input checked="" type="checkbox"/>	_____	_____
Cadmium (Cd)	<input checked="" type="checkbox"/>	_____	_____
Chromium-Total	<input checked="" type="checkbox"/>	_____	_____
Copper (Cu)	<input checked="" type="checkbox"/>	_____	_____
Cyanide (CN)	<input checked="" type="checkbox"/>	_____	_____
Lead (Pb)	<input checked="" type="checkbox"/>	_____	_____
Mercury (Hg)	<input checked="" type="checkbox"/>	_____	_____
Molybdenum (Mo)	-----	-----	-----
Nickel (Ni)	<input checked="" type="checkbox"/>	_____	_____
Selenium (Se)	-----	-----	-----
Silver (Ag)	<input checked="" type="checkbox"/>	_____	_____
Zinc (Zn)	<input checked="" type="checkbox"/>	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

\*Except the LRAFB which has special mass limits.

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants?  
N/A

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	<u>1</u>	1/year	<u>None (page 17) *</u>
Other SIUs	<u>1</u>	1/year	<u>" "</u>
Sampling:			
CIUs	<u>1</u>	1/year	<u>" (page 19)</u>
Other SIUs	<u>1+</u>	1/year	<u>" "</u>
Reporting:			
CIUs	<u>2+</u>	2/year	<u>" (page 17)</u>
Other SIUs	<u>2+</u>	2/year	<u>" "</u>
Self-Monitoring:			
CIUs	<u>2+</u>	2/year	<u>" (page 17)</u>
Other SIUs	<u>2+</u>	2/year	<u>" "</u>

\*Page numbers refer to program approved on 07/30/2010.

#	%	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
<u>0</u>	<u>0</u>	Not sampled at least once in the past reporting year?
<u>0</u>	<u>0</u>	Not inspected at least once in the past Pretreatment reporting year?
<u>0</u>	<u>0</u>	Not inspected or not sampled at least once in the past reporting year ? [ICIS-RIDE/PPSR*] - [403.8 (f) (2) (v)]

\* PPSR (Pretreatment Performance Summary Report)- *this is a count of SIUs that are either not inspected OR not sampled in the past 12 months. This is NOT a count of SIUs that were both not sampled and not inspected. Do not count repetitive SIU names more than once.*

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected.

Does the Control Authority routinely split samples with industrial personnel:

YES    NO  
        If requested?  
        To verify IU self-monitoring results?

Provide the following information regarding pollutant analyses done by the POTW:

	Analytical Method *	Name of Laboratory
Metals	<u>ICAP</u>	<u>American Interplex</u>
Cyanide	<u>Spectrophotometric</u>	<u>" " "</u>
Organics	<u>GC/MS</u>	<u>" " "</u>
Other	<u>Biomonitoring</u>	<u>" " "</u>

Were all wastewater samples analyzed by 40 CFR 136 methods? Yes

\* Enter the type of Analytical Method used for each group of pollutants. (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, etc.)

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

1 Does the POTW use QA/QC for sampling and analysis? If yes, describe:  
CA uses labs certified by ADEQ

How much time normally elapses between sample collection and obtaining analytical results for:

2 wks Conventionals  
2 wks Metals  
2 wks Organics

1 Is there an established protocol clearly detailing sampling location and procedures?

Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: \_\_\_\_\_

1. CA has written sample protocol for each SIU.

Does the Control Authority use the following methods for compliance monitoring?

YES NO

- Scheduled compliance monitoring
- Unscheduled compliance monitoring
- Demand monitoring for IU compliance
- IU self-monitoring
- Other:

YES NO

Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below.

I. ENFORCEMENT

YES NO

Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(viii)] [13.24.28(5)]

Does the Control Authority have a written enforcement response plan (ERP)? [403.8(f)(5)]. If yes, does the plan:

YES NO

- Describe how the Control Authority will investigate instances of noncompliance
- Describe the Control Authority's types of escalating enforcement responses and the periods for each response
- Identify by Title the Official(s) responsible for implementing each type of enforcement response
- Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

- Notice or letter of violation
- Setting of compliance schedule
- Injunctive relief
- Administrative Order
- Revocation of permit
- Fines (maximum amount):
  - civil \$ 1000 /day/violation
  - criminal \$ 1000 /day/violation
  - administrative \$ 1000 /day/violation
- Imprisonment
- Termination of Service
- Other: \_\_\_\_\_

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: None

YES NO

- When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
- Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].  
 Comment: The approved program modification addresses resampling requirement; see page 17 in the program narrative.
- N/A If no, does the Control Authority conduct all of the monitoring?

YES NO N/A

Does the pattern of enforcement conform to the ERP?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Action Date	Return to Compliance? Yes (Date)	No
<u>None</u>					

Indicate the number and percent of SIUs that were identified as being in significant noncompliance during the past Pretreatment reporting period:

#	%	
<u>0</u>	<u>0</u>	Pretreatment Standards [ICIS-RIDE] (Local Limits/Categorical Standards)
<u>0</u>	<u>0</u>	Self-monitoring requirements [ICIS-RIDE]
<u>0</u>	<u>0</u>	Reporting requirements [ICIS-RIDE]
<u>0</u>	<u>0</u>	Pretreatment compliance schedule [ICIS-RIDE]
<u>0</u>		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [ICIS-RIDE]

YES NO

- Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. \_\_\_\_\_



SECTION II: PROGRAM ANALYSIS AND PROFILE

Has the Control Authority experienced any of the following:

- | <u>YES</u>                          | <u>NO</u>                | <u>EXPLAIN and ID Industrial User</u>                   |
|-------------------------------------|--------------------------|---------------------------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Interference [ICIS] _____                               |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Pass through [ICIS] _____                               |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Fire or explosions?<br>(incl. flash point viol.) _____  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Corrosive structural damage?<br>(incl. pH <5.0). _____  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Flow obstructions? _____                                |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Excessive flow<br>or pollutant<br>concentrations? _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Heat problems? _____                                    |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Interference due to oil<br>or grease? _____             |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Toxic fumes? _____                                      |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Illicit dumping of<br>hauled wastes? _____              |

- | <u>YES</u>                          | <u>NO</u>                           |                                                                                                                                                                    |
|-------------------------------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)] |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | How many SIUs are currently on compliance schedules?<br><u>0</u>                                                                                                   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]              |

Indicate the number of SIUs from which penalties have been collected by the Control Authority during the past Pretreatment reporting period:

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	\$ _____
Administrative	<u>0</u>	\$ _____
Total	<u>0</u>	\$ _____

[ICIS-RIDE]

SECTION III: INDUSTRIAL USER FILE REVIEW

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO  
  Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES NO  
  computerized  
  hard copy  
  OTHER: -----

Are the following files computerized:

YES NO  
  Control Mechanism Issuance  
 &  Inspection and Sampling schedule  
  Monitoring Data  
  IU Compliance Status Tracking  
  Other: Chain of Custody Forms -----

Can IU monitoring data can be retrieved by:

Industry name  
  Pollutant type  
  Industrial category or type  
  SIC Code  
  IU discharge volume  
  Geographic location  
  Receiving treatment plant (i.e.if > one plant in the system)  
  Other (specify) -----

Does the POTW have provisions to address claims of confidentiality?  
 [403.8(f)(1)(vii)]

Have IUs requested that data be held confidential?  
 How is confidential information handled by the Control Authority?  
 -----

Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: -----  
 -----

Are all records maintained for at least 3 years?

SECTION III: INDUSTRIAL USER FILE REVIEW

K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] \* - FTE = Full Time Equivalent Employee

~1.0 FTE

YES NO

✓ Have any problems in program implementation been observed which appear to be related to inadequate funding?  
If yes, describe and show below the source(s) of funding for the program:

	<u>Percent of Total Funding</u>
<u>✓</u> POTW general operating fund	<u>99</u>
<u>✓</u> IU permit fees	<u>.25</u>
<u>✓</u> monitoring charges	<u>.5</u>
<u>✓</u> industry surcharges	<u>.25</u>
<u>      </u> other (describe) _____	
	Total 100%

✓ Is funding expected to continue near the current level? If no, will it: Increase \_\_\_\_\_ or Decrease \_\_\_\_\_  
If no, describe the nature of the changes:

Are an adequate number of personnel available for the following program areas:

YES NO

If no, explain

- ✓ Legal assistance \_\_\_\_\_
- ✓ Permitting \_\_\_\_\_
- ✓ IU inspections \_\_\_\_\_
- ✓ Sample collection \_\_\_\_\_
- ✓ Sample analyses \_\_\_\_\_
- ✓ Data analysis, review and response \_\_\_\_\_
- ✓ Enforcement \_\_\_\_\_
- ✓ Administration (inc. record keeping /data management) \_\_\_\_\_

Does the Control Authority have access to adequate:

YES NO

If yes then list and if no, explain

- ✓ Sampling equipment City has isco automatic samplers and flowmeters
- ✓ Safety equipment Gas detectors, blowers, ropes, glove, suits safety glasses, respirators, et.al.
- ✓ Vehicles Pick-Up and car
- ✓ Analytical equipment retains contract lab

SECTION III: INDUSTRIAL USER FILE REVIEW

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):  
The City has assisted the local industries with waste minimization efforts.
  
2. Has the source of any toxic pollutants been identified?  
If yes, what was found?  
N/A
  
3. Has the POTW implemented any kind of public education program? If yes, describe:  
N/A
  
4. Does the POTW have any pollution prevention success stories for industrial users documented? Yes. If yes, please attach. Ashland (evaporates all process wastewater),
  
5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?  
No
  
6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No  
If yes, which of the "Guides to Pollution Prevention" were used?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Two Pines File/ID No. 03-10-10  
Industry Address 100 Two Pines Drive North  
Industry Description Landfill  
Industrial Category Not Applicable 40 CFR N/A SIC Code: \_\_\_\_\_  
Ave. Total Flow (gpd) ~7500 Ave. Process Flow (gpd) ~7000

Industry visited during audit: **YES**

Comments: IU discharges leachate to the POTW from the landfills

FILE #: 2 Industry Name Ashland Specialty File/ID No. 86-02-01  
Industry Address 1901 Redmond Rd  
Industry Description Mfr of Polyester Resins  
Industrial Category OCPSF 40 CFR 414 SIC Code: 2821  
Ave. Total Flow (gpd) 3387 Ave. Process Flow (gpd) 0

Industry visited during audit: **YES**

Comments: IU evaporates all process wastewater except lab wastewater. The lab wastewater is collected and hauled off-site. The sanitary wastewater is collected in a tank on-site, sampled and discharged to the POTW.

FILE #: 3 Industry Name \_\_\_\_\_ File/ID No. \_\_\_\_\_  
Industry Address \_\_\_\_\_ Industry Description \_\_\_\_\_  
Industrial Category \_\_\_\_\_ 40 CFR \_\_\_\_\_ SIC Code: \_\_\_\_\_  
Ave. Total Flow (gpd) \_\_\_\_\_ Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit: **YES**

Comments: \_\_\_\_\_

FILE #: 4 Industry Name \_\_\_\_\_ File/ID No. \_\_\_\_\_  
Industry Address \_\_\_\_\_ Industry Description \_\_\_\_\_  
Industrial Category \_\_\_\_\_ 40 CFR \_\_\_\_\_ SIC Code: \_\_\_\_\_  
Ave. Total Flow (gpd) \_\_\_\_\_ Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit: **YES**

Comments: \_\_\_\_\_

FILE #: 5 Industry Name Little Rock Air Force Base File/ID No. 87-08-12  
Industry Address North by NW and Adjacent to Jacksonville city limit  
Industry Description Federal Military Base  
Industrial Category N/A 40 CFR \_\_\_\_\_ SIC Code: 9711  
Ave. Total Flow (gpd) 1,350,000 Ave. Process Flow (gpd) ~25,000

Industry visited during audit: **YES**

Comments: Base has a number of major areas that can produce process wastewater (NDI Lab, Motor Pool, Aircraft Wash, Corrosion Control Bldg., etc.)

SECTION III: INDUSTRIAL USER FILE REVIEW

**A. Industrial User Characterization**

	Y => Yes		N => No		N/A => Not Applicable	
	<u>Two Pine</u>	<u>Ashland</u>				<u>LRAFB</u>
1. Is the IU considered "significant" by the Control Authority?	<u>Y</u>	<u>Y</u>	-----	-----	-----	<u>Y</u>
2. Is the user subject to categorical pretreatment standards?	<u>N</u>	<u>Y</u>	-----	-----	-----	<u>N</u>
a. New source or existing source (NS or ES)?	<u>N/A</u>	<u>ES<sup>1</sup></u>	-----	-----	-----	<u>N/A</u>
b. Is this IU one identified as having P <sup>2</sup> potential?	<u>N<sup>2</sup></u>	<u>Y</u>	-----	-----	-----	<u>Y</u>

**B. Control Mechanism**

1. Does the file contain an application for a control mechanism? If yes, what is the application date?	<u>Y<sup>3</sup></u>	<u>Y<sup>3</sup></u>	-----	-----	-----	<u>Y<sup>3</sup></u>
Does it ask for Pollution Prevention information?	<u>N</u>	<u>N</u>	-----	-----	-----	<u>N</u>
2. Does the file contain a permit?	<u>Y</u>	<u>Y</u>	-----	-----	-----	<u>Y</u>
Permit Expiration Date <sup>4</sup> ?	<u>02-11-16</u>	<u>12-31-16</u>	-----	-----	-----	<u>12-31-14</u>
Is a fact sheet included?	<u>Y</u>	<u>Y</u>	-----	-----	-----	<u>Y</u>

Comments:

1. Ashland installed the regulated process in 1973 and is an Existing Source (ES).
2. Two Pines is a landfill that complies with regulated cover material and has no direct control over the amount and composition of leachate.
3. These IUs submitted an Industrial Waste Survey (IWS) and BMR as an appendix to the permit application.
4. [Reserved]
5. [Reserved]

## SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes    N => No    N/A => Not Applicable    p1 => page 1

	<u>Two Pine</u>	<u>Ashland</u>			<u>LRAFB</u>
3. Has the SIU been issued a control mechanism <sup>6</sup> containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>p1</u>	<u>p1</u>	-----	-----	<u>p1</u>
b. Expiration date?	<u>p1</u>	<u>p1</u>	-----	-----	<u>p1</u>
c. Statement of nontransferability?	<u>p7</u>	<u>p7</u>	-----	-----	<u>p7</u>
d. Appropriate discharge limitations?	<u>p2<sup>7</sup></u>	<u>p2<sup>7</sup></u>	-----	-----	<u>p2<sup>7</sup></u>
e. Appropriate self-monitoring requirements?	<u>p3</u>	<u>p3<sup>8</sup></u>	-----	-----	<u>p3</u>
f. Sampling frequency?	<u>p3</u>	<u>p3<sup>8</sup></u>	-----	-----	<u>p3</u>
g. Sampling locations?	<u>p3</u>	<u>p3<sup>8</sup></u>	-----	-----	<u>p3</u>
h. Requirement for flow monitoring?	<u>p3</u>	<u>p3<sup>8</sup></u>	-----	-----	<u>p3</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>p2</u>	<u>p2</u>	-----	-----	<u>p2</u>
j. Applicable IU reporting requirements?	<u>p4</u>	<u>p4</u>	-----	-----	<u>p4</u>
k. Standard conditions for:					
Right of Entry?	<u>p7</u>	<u>p7</u>	-----	-----	<u>p7</u>
Records retention?	<u>p7</u>	<u>p7</u>	-----	-----	<u>p7</u>
Civil and Criminal Penalty provisions?	<u>p8</u>	<u>p8</u>	-----	-----	<u>p8</u>
Revocation of permit?	<u>p7</u>	<u>p7</u>	-----	-----	<u>p7</u>
l. Compliance schedules/progress reports	<u>N/A</u>	<u>N/A</u>	-----	-----	<u>N/A</u>
m. General/Specific Prohibitions?	<u>p7</u>	<u>p7</u>	-----	-----	<u>p7</u>
n. Where technologically and economically achievable, are P2 aspect included?	<u>N</u>	<u>Y<sup>9</sup></u>	-----	-----	<u>N</u>

Comments:

6. Refer to Attachment C (Graphic Packaging Permit) to view the referenced pages (p1, p2, etc.) 7. The City has employed local limits in the permits. These local limits are still under review by the Approval Authority.
7. The present permit limits do not protect the POTW; see Recommendation #4 in the Audit Report.
8. Ashland has no process wastewater discharge.
9. See Attachment N to the 2010 Audit Report (JWWU 2009 Annual Report) for P2 aspects.
10. Even though the "existing" local limits should be updated, the City has properly applied the existing local limits and categorical standards to Ashland's permit.





## SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes    N => No    N/A => Not Applicable    D-3/3 => Attachment D-3/3

	<u>Two Pine</u>	<u>Ashland</u>		<u>LRAFB</u>
3. Does the sampling report(s) <sup>11</sup> include: [403.8(f)(2)(vi)]				
a. Name of sampling personnel?	<u>Y</u>	<u>D-3/3</u>	-----	<u>Y</u>
b. Sample date and time?	<u>Y</u>	<u>D-3/3</u>	-----	<u>Y</u>
c. Sample type?	<u>Y</u>	<u>D-3/3</u>	-----	<u>Y</u>
d. Wastewater flow at the time of sampling?	<u>Y</u>	<u>Y<sup>12</sup></u>	-----	<u>Y</u>
e. Sample preservation procedures?	<u>Y</u>	<u>Y</u>	-----	<u>Y</u>
f. Chain-of-custody records?	<u>Y</u>	<u>Y</u>	-----	<u>Y</u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u>Y</u>	<u>Y<sup>13</sup></u>	-----	<u>Y</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>N/A</u>	<u>N/A</u>	-----	<u>N/A</u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>Y</u>	<u>Y</u>	-----	<u>Y</u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>Y</u>	<u>Y</u>	-----	<u>Y</u>
<b><u>Inspections</u></b>				
7. Does the IU file contain inspection reports <sup>14</sup> ?	<u>Y</u>	<u>Y</u>	-----	<u>Y</u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>Y</u>	<u>Y</u>	-----	<u>Y</u>
b. Date of last Inspection	<u>10-24-12</u>	<u>06-28-12</u>	-----	<u>10-25-12</u>

Comments:

- 11. See Attachment H-1/10 for a copy of LRAFB Self-Monitoring Report.
- 12. Ashland does not have routine process wastewater discharge.
- 13. Ashland file has analytical results as "proof" even though the IU does not discharge process wastewater.
- 14. The LRAFB has developed a Slug Control Plan; Two Pines and Ashland do not have slug potential. See Attachment A-17/26.
- 15. See Attachment A-19/26 for a copy of Ashland BMR.

## SECTION III: INDUSTRIAL USER FILE REVIEW

	Y => Yes	N => No	N/A => Not Applicable		
	<u>Two Pines</u>	<u>Ashland</u>	_____	_____	<u>LRAFB<sup>14</sup></u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	--Y--	--Y--	-----	-----	--Y--
b. Inspection date and time?	--Y--	--Y--	-----	-----	--Y--
c. Name and title of IU official contacted?	--Y--	--Y--	-----	-----	--Y--
d. Verification of production rates?	--Y--	--Y--	-----	-----	--Y--
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	--Y--	--Y--	-----	-----	--Y--
f. Evaluation of pretreatment facilities?	--Y--	--Y--	-----	-----	--Y--
g. Evaluation of self-monitoring equipment and techniques?	--Y--	--Y--	-----	-----	--Y--
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	--Y--	--Y--	-----	-----	--Y--
i. Manufacturing facilities?	--Y--	--Y--	-----	-----	--Y--
j. Chemical handling and storage procedures?	--Y--	--Y--	-----	-----	--Y--
k. Chemical spill prevention areas?	--Y--	--Y--	-----	-----	--Y--
l. Hazardous waste storage areas and handling procedures?	--Y--	--Y--	-----	-----	--Y--
m. Sampling procedures?	--Y--	--Y--	-----	-----	--Y--
n. Laboratory procedures?	--Y--	--Y--	-----	-----	--Y--
o. Monitoring records?	--Y--	--Y--	-----	-----	--Y--
p. Evaluation of Pollution Prevention opportunities?	--N--	--N--	-----	-----	--N--
q. Control Authority inspector signature?	--Y--	--Y--	-----	-----	--Y--

## SECTION III: INDUSTRIAL USER FILE REVIEW

### IU Self-Monitoring and Reporting

	Y => Yes	N => No	N/A => Not Applicable	
	<u>Two Pines</u>	<u>Ashland</u>	_____	<u>LRAFB<sup>17</sup></u>
10. Does the file contain self-monitoring reports?	<u>Y</u>	<u>Y</u>	_____	<u>Y</u>
11. Does the file include:				
a. BMR?	<u>N/A</u>	<u>Y<sup>15</sup></u>	_____	<u>N/A</u>
b. 90-Day Report?	<u>N/A</u>	<u>Y</u>	_____	<u>N/A</u>
c. All periodic reports?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
d. Compliance schedule reports?	<u>N/A</u>	<u>N/A</u>	_____	<u>N/A</u>
12. Did the IU report on all required parameters?	<u>Y</u>	<u>Y</u>	_____	<u>H-2/10</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>Y</u>	<u>Y</u>	_____	<u>Y</u>
14. Did the IU report flow?	<u>Y</u>	<u>Y</u>	_____	<u>H-2/10</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>Y</u>	<u>Y</u>	_____	<u>Y</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>Y</u>	<u>Y</u>	_____	<u>H-1/10</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>N/A</u>	<u>N/A</u>	_____	<u>N/A</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>N<sup>14</sup></u>	<u>N<sup>14</sup></u>	_____	<u>Y<sup>14</sup></u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>N</u>	<u>N</u>	_____	<u>N</u>
If yes, does the file contain documentation regarding:				
a. Did the spill cause Pass Through or Interference?	<u>N/A</u>	<u>N/A</u>	_____	<u>N/A</u>
b. Did POTW respond to the spill?	<u>N/A</u>	<u>N/A</u>	_____	<u>N/A</u>

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

**E. Enforcement**

	Y => Yes	N => No	N/A => Not Applicable	
	<u>Two Pine</u>	<u>Ashland</u>	<u>LRAFB</u>	
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]				
a. Control Authority monitoring results?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
b. IU self-monitoring results?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>  0  </u>	<u>  0  </u>	<u>      </u>	<u>  0  </u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
5. Were all nondischarge violations identified in the file?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
6. Was the IU notified of all violations?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
8. Did the Control Authority follow its approved ERP?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
10. Is there a compliance schedule? If yes:	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>
11. Were there any compliance schedule violations?	<u>N/A</u>	<u>N/A</u>	<u>      </u>	<u>N/A</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes      N => No      N/A => Not Applicable

Two Pine      Ashland      \_\_\_\_\_      \_\_\_\_\_      LRAFB

12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]      N/A      N/A      \_\_\_\_\_      \_\_\_\_\_      N/A

During evaluation for SNC, did the CA consider each of the following criteria?

a. Chronic violations	<u>N/A</u>	<u>N/A</u>	_____	_____	<u>N/A</u>
b. TRC	<u>N/A</u>	<u>N/A</u>	_____	_____	<u>N/A</u>
c. Pass through/Interference	<u>N/A</u>	<u>N/A</u>	_____	_____	<u>N/A</u>
d. Spill/slug loads	<u>N/A</u>	<u>N/A</u>	_____	_____	<u>N/A</u>
e. Reporting	<u>N/A</u>	<u>N/A</u>	_____	_____	<u>N/A</u>
f. Compliance schedule	<u>N/A</u>	<u>N/A</u>	_____	_____	<u>N/A</u>
g. others (specify)	<u>N/A</u>	<u>N/A</u>	_____	_____	<u>N/A</u>

13. Was the SIU published for SNC?      N/A      N/A      \_\_\_\_\_      \_\_\_\_\_      N/A

Date of publication.      N/A      N/A      \_\_\_\_\_      \_\_\_\_\_      N/A

SECTION III: INDUSTRIAL USER FILE REVIEW

**REPORTABLE NONCOMPLIANCE (RNC)  
for the Pretreatment Audit Checklist**

**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)**

Control Authority: City of Jacksonville NPDES #: AR0041335

Date of Audit: March 19-21, 2013 Date entered into ICIS: \_\_\_\_\_  
(ASSESSMENT)

Level

---

<b>NO</b>	Failure to enforce against pass through and/or interference	I
<b>NO</b>	Failure to submit required reports within 30 days	I
<b>NO</b>	Failure to meet compliance schedule milestone date within 90 days	I
<b>NO</b>	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
<b>NO</b>	Failure to inspect or sample 80% of SIUs within the last reporting year	II
<b>NO</b>	Failure to enforce pretreatment standards and reporting requirements	II
<b>NO</b>	Other violations of concern	II

---

SIGNIFICANT NONCOMPLIANCE (SNC)

**NO** Is the Control Authority in SNC for violation of any Level I criterion.

**NO** Is the Control Authority in SNC for violation of 2 or more Level II criterion.

**(INSERT ICIS WORKSHEET HERE)**

# Compliance Monitoring Information

Compliance Activity Type: *Inspection/Evaluation*

Compliance Monitoring Type: *Audit*

Compliance Monitoring Activity Name: Inspection

NPDES Permit No. AR0041335

## Compliance Monitoring Dates

Planned Start Date: 3/19/2013

Actual Start Date: 3/19/2013

Planned End Date: 3/21/2013

Actual End Date: 3/21/2013

## Statutes and Sections Information

Programs: *NPDES – Pretreatment*

Compliance Monitoring Action Reasons: *Core Program*

Compliance Monitoring Agency Type: *State*

Compliance Monitoring Agency Name: *ADEQ*

Did EPA Assist? No

Was this a State or Joint Compliance Monitoring Activity? State

## Government Contacts

Affiliation Type: State

First Name: Rufus

Last Name: Torrence

Phone: 501-682-062

Office: North Little Rock

Organization: ADEQ

## Codes

SIC Codes: 4952 Sewerage Systems

NAICS Codes:

## Compliance Monitoring Information

Number of Days Physically Conduction Activity: 3

Compliance Monitoring Action Outcome: No Violations

Compliance Monitoring Rating Code (SATISFACTORY, MARGINAL, UNSATISFACTORY, UNRATED): Satisfactory

## Compliance Monitoring Comments

003: Significant Industries Site Visits Conducted

---

Special Programs

## Significant Industrial Users (SIUs)

SIUs: SIUs Without Control Mechanism: SIUs Not Inspected: SIUs Not Sampled: SIUs in SNC with Pretreatment Standards: SIUs in SNC with Reporting Requirements: SIUs in SNC with Pretreatment Schedule: SIUs in SNC Published in Newspaper: SIUs Schedules: Violation Notices Issued to SIUs: Administrative Orders Issued to SIUs: Civil Suits Filed Against SIUs: Criminal Suits Filed Against SIUs: 

---

Categorical Industrial Users (CIUs)CIUs: CIUs in SNC: 

---

PenaltiesDollar Amount of Penalties Collected Industrial Users (IUs) from which Penalties have been collected



SECTION III: INDUSTRIAL USER FILE REVIEW

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT**

Control Authority: City of Jacksonville NPDES #: AR0041335

Name, address and phone number of industry:

Little Rock Air Force Base

NW of the City of Jacksonville City Limits (501)987-1110

Type of industry: Military Base

Date/Time of visit: March 20 @ 9:30 am

Industry contacts: Ron Love, Chief Env Compliance (501) 987-7700

Dwight Henderson, Water and Fuel Shop 987-7703

	Yes	No	N/A
1. Significant industrial user?	<u>Y</u>	---	---
2. Classified correctly?	<u>Y</u>	---	---
3. Pretreatment equipment or procedures?	<u>1</u>	---	---
4. Pretreatment equipment maintained and operational?	<u>Y</u>	---	---
5. Hazardous waste generated or stored?	<u>2</u>	---	---
6. Proper solid waste disposal?	<u>Y</u>	---	---
7. Solvent management/TTO control?	<u>3</u>	---	---
8. Suitable sampling location?	<u>4</u>	---	---
9. Appropriate self-monitoring procedures/equipment?	<u>4</u>	---	---
10. Adequate spill prevention and control?	<u>Y</u>	---	---
11. Industrial familiar with limits and requirements?	<u>Y</u>	---	---
12. Pollution Prevention activity	---	<u>N</u>	---

Additional comments:

1. *Previously, the base had central Oil & Water Separators through out the facility but military personnel misunderstood the intent and used the separators as "oil disposal units". The base removed and the "central" separators and has "local" separators at each building with wet operations.*

2. *Stored by not generated*

3. *Spent Alodine tubes are placed in barrels for disposal*

4. *Manhole access with flow meter on 24" line @ 34 51 43.44 N 92 08 04.15 W near City of Jacksonville Animal Shelter.*

Visit conducted by: Torrence/McGill Date: March 20, 2013

SECTION III: INDUSTRIAL USER FILE REVIEW

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Jacksonville NPDES #: AR0041335

Industry name: LR Air Force Base

Additional comments:

*The following is a summary of major areas in the base that produce wastewater:*

*Community of 10,000 people with 1500 homes, 2 dining halls, a club, 2 lounges, 6 fast food restaurants, 3 gas stations, etc.*

*USAF Hobby Shop: This area is used by LRAFB personnel to repair personal automobiles and watercrafts.*

*USAF Motor Pool: This area has military vehicles. The area is equipped with an oil/water separator.*

*USAF Aircraft Ground Equipment: This building performs routine maintenance and repairs for the support equipment used by the aircraft crews during servicing and repair of aircraft.*

*USAF Aircraft Wash Hangars (two): Plane wash area with oil/water separator.*

*USAF Corrosion Control Building: Paint and prep hangar.*

*USAF Fuel Cell Building: Fuel tank storage and repair & maintenance.*

*USAF Hospital: Base Hospital*

*Air National Guard Facility: The Air National Guard dental and medical clinics are housed here.*

*Nondestructive Inspection: Inspect parts from aircraft using immersion in florescent penetrant liquids (no toxic organics or metals in liquids).*

*Engine Repair and Testing Facilities*

Visit conducted by: Torrence & McGill Date: March 20, 2013

-----  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT**

Control Authority: City of Jacksonville NPDES #: AR0041335

Name, address and phone number of industry:

Ashland Specialty

1901 Redmond Road 72076 (501)533-6117

Type of industry: Mfr of Resins 40 CFR Part 414

(Include regulatory citation if CIU)

Date/Time of visit: March 20, 2013 @ 11:00 am

Industry contacts: Mike Taylor, Env Health and Safety Coordinator

	Yes	No	N/A
1. Significant industrial user?	<u>Y</u>	---	---
2. Classified correctly?	<u>Y</u>	---	---
3. Pretreatment equipment or procedures?	<u>1</u>	---	---
4. Pretreatment equipment maintained and operational?	<u>1</u>	---	---
5. Hazardous waste generated or stored?	<u>Y</u>	---	---
6. Proper solid waste disposal?	<u>Y</u>	---	---
7. Solvent management/TTO control?	<u>Y</u>	---	---
8. Suitable sampling location?	<u>2</u>	---	---
9. Appropriate self-monitoring procedures/equipment?	<u>2</u>	---	---
10. Adequate spill prevention and control?	<u>Y</u>	---	---
11. Industrial familiar with limits and requirements?	<u>Y</u>	---	---
12. Pollution Prevention activity	<u>3</u>	---	---

Additional comments:

1. Ashland has a collection tank on-site for non-contact cooling water, boiler blow-down, compressor condensate, domestic wastewater, etc. The pH is monitored and controlled before the tank wastewater is discharged.

2. At the bottom of the collection tank, a nipple and valve (for sampling) is located on the line where the wastewater is released to the POTW.

3. Ashland process design evaporates all regulated wastewater.

Visit conducted by: Torrence/McGill Date: March 20, 2013

-----  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

**PRETREATMENT AUDIT  
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Jacksonville NPDES #: AR0041335

Industry name: Ashland Specialty-----

Additional comments:

*Ashland is a bulk storage and reactor plant; the main process is manufacturing polyester/styrene resins. No process wastewater is discharged to the POTW as all process wastewater is generated and evaporated` except small quantities from the quality control laboratory (this lab water is collected and hauled off-site). The majority of wastewater discharged to the POTW is from domestic sources within the plant and office areas. All wastewater is collected in a holding tank with inline pH and flow meters.*

Visit conducted by: Torrence & McGill Date: March 20, 2013

-----  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT**

Control Authority: City of Jacksonville NPDES #: AR0041335

Name, address and phone number of industry:

TWO PINES

100 Two Pines Dr. North (501) 982-7336 72076

Type of industry: Landfill

Date/Time of visit: March 20, 2013 @ 2:00 pm

Industry contacts:

Carl Simmons, Sr Dist Mgr 901-233-2253 csimmons@wm.com

Jodi Taylor, EP Mgr 501-982-7336 or 501-993-8966

Damon Sanford, Ops Mgr 870-209-6493

	Yes	No	N/A
1. Significant industrial user?	<u>Y</u>	---	---
2. Classified correctly?	<u>Y</u>	---	---
3. Pretreatment equipment or procedures?	---	---	<u>N/A</u>
4. Pretreatment equipment maintained and operational?	---	---	<u>N/A</u>
5. Hazardous waste generated or stored?	---	---	<u>N/A</u>
6. Proper solid waste disposal?	---	---	<u>N/A</u>
7. Solvent management/TTO control?	---	---	<u>N/A</u>
8. Suitable sampling location?	<u>Y</u>	---	---
9. Appropriate self-monitoring procedures/equipment?	<u>Y</u>	---	---
10. Adequate spill prevention and control?	---	---	<u>N/A</u>
11. Industrial familiar with limits and requirements?	<u>Y</u>	---	---
12. Pollution Prevention activity	<u>1</u>	---	---

Additional comments:

*1. Ashland is currently updating its Best Management Practices to control stormwater runoff and septage (septage creates leachate). Ashland has agreed to coordinate efforts on the BMP with the City to ensure continued control on the quantity and composition of leachate.*

Visit conducted by: Torrence/McGill Date: March 20, 2013

-----  
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: *City of Jacksonville* NPDES #: *AR0041335*

Industry name: -----*TWO PINES*-----

Additional comments:

*(None)*

Visit conducted by: *Torrence & McGill* Date: *March 20, 2013*

-----  
(signature of auditor conducting visit)

APPLICATION FOR INDUSTRIAL DISCHARGE PERMIT

Company: Ashland Inc.

Physical Address: 1901 N. Redmond Rd. Jacksonville, AR 72076

Mailing Address: 1901 N. Redmond Rd. Jacksonville, AR 72076

E-Mail Address: ralph.smith@ashland.com/wmtaylor@ashland.com

Telephone No.: 501-533-6129/501-5336112 Fax No.: 501-533-6101

Primary Contact Person & Title: Ralph Smith, Plant Manager

Secondary Contact Person & Title: Mike Taylor, EHS+S

Principal Products or Services: Manufacture of unsaturated polyester resins

SIC/NACIS CODE(s): 2821/325211

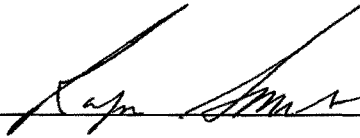
The undersigned requests an Industrial Discharge Permit be granted by the Jacksonville Sewer Commission, and offers the following as appendices to this application:

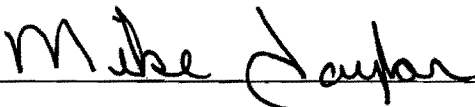
1. A plan to the property showing accurately all sewers and drains now existing.
2. Plans and specifications covering and work purposed that would have bearing upon the industrial discharge.
3. A complete schedule of all processed water and industrial wastes produced or expected to be produced at said property, including a description of the character of each waste, the daily volume and maximum rates of discharge, representative analysis of each process discharge and any measures taken as of this date to reach compliance of any known pretreatment standard or requirement.

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In consideration in the granting of this permit the undersigned further agrees:

1. To furnish information referring to the installation of use of the industrial sewer for which this permit is sought, as may be requested by the Jacksonville Sewer Commission or their representatives.
2. To accept and abide by all provisions of Ordinance No. 1360 of the City of Jacksonville and all other pertinent orders or regulations that may be adopted in the future.
3. To operate and maintain the waste pretreatment facilities as may be required in an efficient manor at all times and at no expense to the Jacksonville Wastewater Utility, the Jacksonville Sewer Commission, or the City of Jacksonville.
4. To cooperate at all times with the manager of the Jacksonville Wastewater Utility and/or his representatives and their inspecting, sampling, and study of the industrial waste, and any facilities provided for pretreatment.
5. To notify the Jacksonville Wastewater Utility immediately in the event of any accident, or other occurrence that occasionally contributes to the wastewater treatment system of any wastewater or substances prohibited or not covered by this permit.

DATE: 11/12/2012 SIGNED:   
Primary Contact

DATE: 11/12/2012 SIGNED:   
Secondary Contact

Application approved and permit granted.

DATE: 1-1-2013 SIGNED:   
Utility Representative

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06CITY OF JACKSONVILLE, ARKANSAS  
INDUSTRIAL USER'S SURVEY

**Note to signing official:** In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.14, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be made available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR Part 2. Should a discharge permit be required for your facility, the information in this questionnaire will be used to issue the permit.

SECTION A: GENERAL INFORMATION

1. Company Name: Ashland Inc.
2. Mailing Address: 1901 N. Redmond Rd  
Jacksonville, AR Zip Code: 72076
3. Premise Address: 1901 N. Redmond Rd.  
Jacksonville, AR Zip Code: 72076
4. Name and Title of Person (s) authorized to represent your company in an official capacity in transactions with Jacksonville Wastewater Utility (a primary and a secondary contact)  
Primary Contact: Ralph Smith  
Title: Plant Manager  
E-Mail: ralph.smith@ashland.com  
Telephone Number: 501-533-6129 Fax Number: 501-533-6101  
Secondary Contact: Mike Taylor  
Title: EHS+S  
E-Mail: wmtaylor@ashland.com  
Telephone Number: 501-533-6112 Fax Number: 501-533-6101
5. Check One:  Existing Discharge  Proposed Discharge  
If proposed, anticipated date of commencement: \_\_\_\_\_
6. If the facility has a corporate office, please list below the corporate officer in charge of environmental / regulatory compliance.  
Corporate Contact: Nicole Hamilton  
Title: Staff Environmental Engineer  
Address: 5200 Blazer Parkway Dublin, OH 43017  
Telephone: 614-790-1938 Fax: 614-790-6080  
E-Mail: nhamilton@ashland.com

7. List all SIC/NACIS codes for this company (along with the applicable description of the code):

SIC # 2821 manufacture of unsaturated polyester resin (Plastic Processing)

NACIS # 325211 plastic material and resin manufacturing

8. List below all, if any, Environmental Permits currently held by the company. Name the issuing agency and list the permit number for the company:

A. Arkansas Department of Environmental Quality RCRA Permit:

\_\_\_\_\_ Yes  No

If Yes, Permit #: \_\_\_\_\_

B. Arkansas Department of Environmental Quality Stormwater Permit:

Yes \_\_\_\_\_ No

If Yes, Permit #: ARR000000

C. Arkansas Department of Environmental Quality Air Permit:

Yes \_\_\_\_\_ No

If Yes, Permit #: 0821-AR-13

D. Arkansas Department of Environmental Quality Incinerator Permit:

\_\_\_\_\_ Yes  No

If Yes, Permit #: \_\_\_\_\_

E. Arkansas Department of Environmental Quality Underground Storage Tank Permit:

\_\_\_\_\_ Yes  No

If Yes, Permit #: \_\_\_\_\_

F. Other Environmental Permits:

\_\_\_\_\_ Yes  No

If Yes, Permit #: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SECTION B: PRODUCT OR SERVICE INFORMATION

1. Give a brief, narrative description of the primary manufacturing or service activity and premise address and the applicable Standard Classification Code (A).

(S.I.C. No.): 2821- manufacture of unsaturated polyester resin

SIC No.(s): 2821

2. Principal Raw Materials Used: Phthalic + Maleic Anhydride, Styrene, Glycols, Dicyclopentad

3. Principal Products Produced: unsaturated polyester resin

4. Check all additional activities and indicate SIC No. (s), if known, at your premise:

	<u>SIC No.</u>		<u>SIC No.</u>
<input type="checkbox"/> Electroplating	_____	<input type="checkbox"/> Food Preparation Service	_____
<input type="checkbox"/> Printing	_____	<input type="checkbox"/> Photographic Processing	_____
<input type="checkbox"/> Warehousing	_____	<input checked="" type="checkbox"/> Plastic Processing	<u>2821</u>
<input type="checkbox"/> Laboratory	_____	<input type="checkbox"/> Painting, Finishing	_____
<input type="checkbox"/> Machine Shop	_____	<input type="checkbox"/> Paint or Ink Formulation	_____
<input type="checkbox"/> Research	_____	<input type="checkbox"/> Laundry, Cleaning	_____
<input type="checkbox"/> Medical Care	_____	<input type="checkbox"/> Rubber Processing	_____
<input type="checkbox"/> Repair Shop, Garage	_____	<input type="checkbox"/> Steam/Power Generation	_____
<input type="checkbox"/> Flammables, Explosives	_____	<input type="checkbox"/> Other (Specify)	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Does your facility practice Pollution Prevention (P2)?  Yes  No

If so, what are type of activities are practiced? Recycle, reuse and reduction self cleaning filters, rework resin, recycle paper, recycle oil, recycle metals, recycle cardboard, recycle pallets

Has your facility seen benefits from these activities?  Yes  No

If so, what type of benefits? Reduction in waste

SECTION C: PLANT OPERATIONAL CHARACTERISTICS

1. Are major processes batch or continuous? Batch  
Average number of batches per 24-hour day: 3
  
2. Are your processes subject to seasonal variation? No  
If yes, explain and indicate the month(s) of peak operation and products:  
\_\_\_\_\_  
\_\_\_\_\_
  
3. Shift Information:  
a. Number of shifts per day: 2      b. Number of workdays per week: 7  
c. Average number of employees per shift: 1<sup>st</sup> 26    2<sup>nd</sup> 6    3<sup>rd</sup> n/a  
Total: 45      Administrative: 13      Production: 32  
d. Shift start times: 1<sup>st</sup> 06:00    2<sup>nd</sup> 18:00    3<sup>rd</sup> n/a
  
4. Describe any water recycling or material-reclaiming processes utilized:  
n/a  
\_\_\_\_\_  
\_\_\_\_\_
  
5. Is a Spill Prevention Control and Countermeasure Plan prepared for the facility?  
If more room is needed, please attach necessary description(s):  
 Yes       No      If yes, describe: NPDES Plan  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SECTION D: WATER CONSUMPTION AND LOSS

1. Raw water source(s):  Municipal Water Division  Private Contract  
 County Water Company  Private Well  
 Surface Water  Other \_\_\_\_\_

2. Water bill addressee: P.O. Box 182586 Columbus, OH 43218-2586

3. Water services account numbers: Ashlan 001

4. List the past twelve months water usage from water bills:

- a. 1<sup>st</sup> six-month period 20 12, 3,856,000 gallons  
 b. 2<sup>nd</sup> six-month period 20 12, 4,104,000 gallons  
 c. Volume from other source(s): 0 gallons per day.

5. List water consumption within the facility:

Type	Estimated Average Volume (GPD)
a. Cooling Water	<u>14,500</u>
b. Boiler Feed	<u>3,800</u>
c. Process	<u>3,400</u>
d. Sanitary	<u>350</u>
e. Plant and Equipment Wash-down	<u>60</u>
f. Irrigation and Lawn Watering	<u>25</u>
g. Other (specify): _____	<u>0</u>
h. Total of a. through g.	<u>22,135</u>

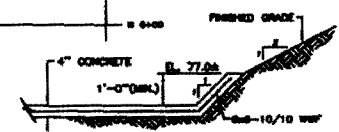
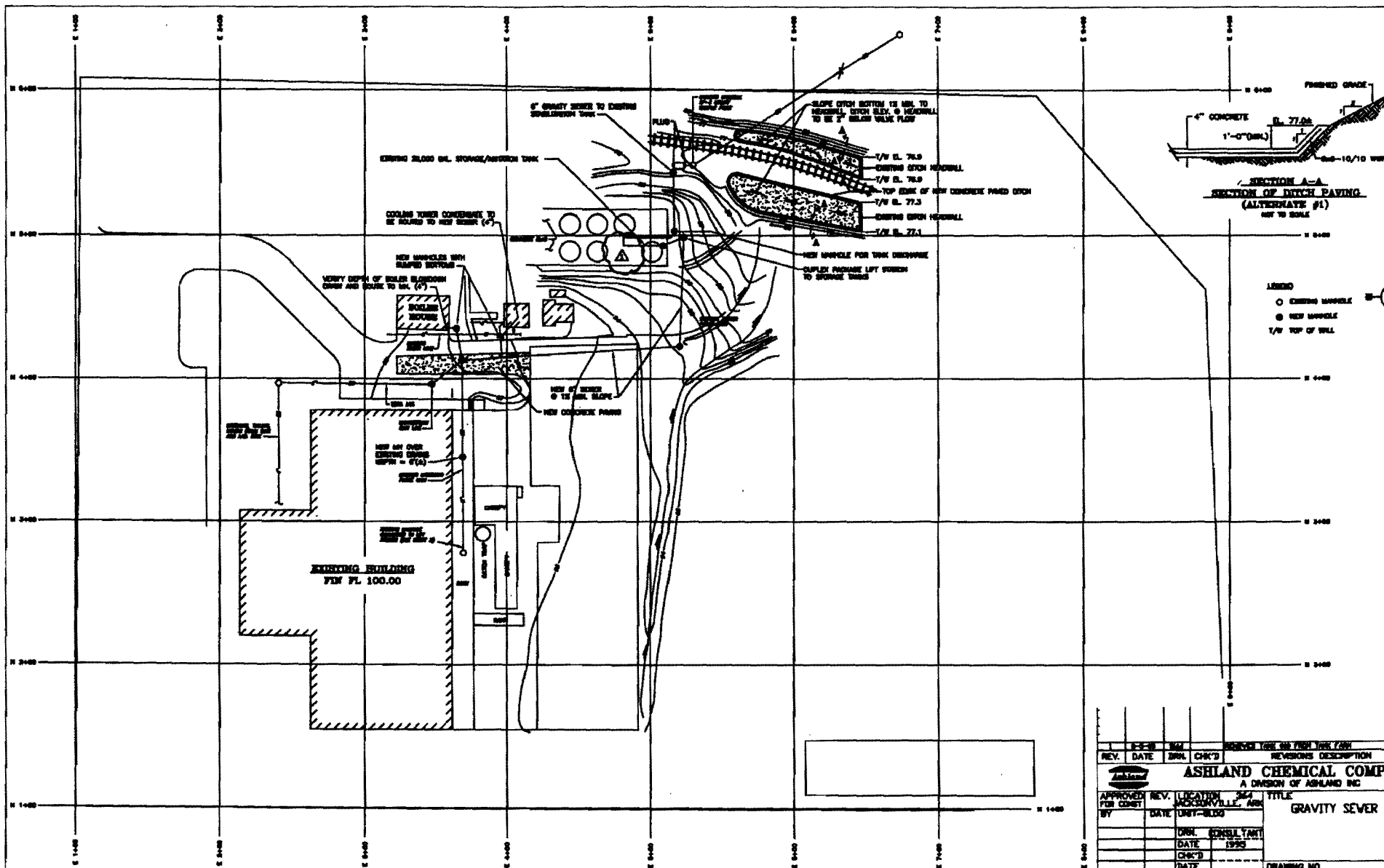
6. List the average volume of discharge lost to:

Outlet	Estimated Average Discharge (GPD)
a. Municipal Sewer	<u>3,000</u>
b. Watercourse, Storm Drain, Ground	<u>0</u>
c. Waste Haulers	<u>0</u>
d. Evaporation	<u>15,500</u>
e. Contained in Product	<u>3,400</u>
f. Total of a. through e.	<u>21,900</u>

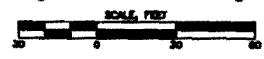
7. List the average water usage and average wastewater discharge for SIC process itemized in SECTION B (attach additional sheets if necessary):

Brief Process Description	SIC No.	Average Water Consumption
a. <u>Manufacture / unsaturated Polyester resin</u>	<u>2821</u>	<u>3400</u> GPD
b. _____	_____	_____ GPD

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- LEGEND
- EXISTING MANHOLE
  - NEW MANHOLE
  - 1/4" TOP OF WALL



**GRAVITY SEWER PLAN**

REV.	DATE	BY	CHK'D	DESCRIPTION	APPR.
1	1-2-88	MM		REVISION TYPE OR FIELD NO. / REVISIONS DESCRIPTION	

		<b>ASHLAND CHEMICAL COMPANY</b> A DIVISION OF ASHLAND INC.	
APPROVED FOR CONST. BY:	REV. DATE:	LOCATION: JACKSONVILLE, ARK.	TITLE: GRAVITY SEWER PLAN
ORNL CONSULTANT DATE: 1990 CHK'D: DATE: SCALE: 1"=30' PLOT: 1-068	DRAWING NO.: 3464-CD-101	REV. 1	CAD FILE NO.: CD-181

c. \_\_\_\_\_

d. \_\_\_\_\_ GPD

8. Describe any water treatment or conditioning processes utilized:

Cooling tower - Polymer / Algicide  
Boilers - Polymer

9. Does your facility have any plans to minimize water usage or any of the following wastewater reduction programs?

Yes Storm Water Pollution Prevention plan in place (SWP 3)?  
Yes SPCC plan in place?

SECTION E: SEWER INFORMATION

1. Attach a scaled drawing of your facility site showing the location of all sewers. In addition, show the location of possible sampling points for these sewers and sampling points for regulated SIC processes. For reference and field orientation, buildings, streets, alleys, and other pertinent structures should be included.

2. List facility sewers shown in Item 1, size and flow; assign reference numbers to each sewer starting with No. 1:

	Reference Number	Sewer Size (in.)	Descriptive location of Sewer Connection of Discharge Point	Average Flow (GPD)
1.	<u>SP-3</u>	<u>6"</u>	<u>Sewer tank to <sup>Sanitary</sup> Sewer</u>	<u>3,000</u>
2.	_____	_____	_____	_____
3.	_____	_____	_____	_____
4.	_____	_____	_____	_____
5.	_____	_____	_____	_____
6.	_____	_____	_____	_____
7.	_____	_____	_____	_____
8.	_____	_____	_____	_____
9.	_____	_____	_____	_____
10.	_____	_____	_____	_____
11.	_____	_____	_____	_____
12.	_____	_____	_____	_____

SECTION F: WASTEWATER INFORMATION

1. Does this facility discharge any wastewater other than from restrooms, cafeterias, or non-contaminated cooling water?

Yes If yes, complete the remainder of Section F

No If no, skip to Section G

2. Please indicate the quantities from the activities indicated below in units of gallons per day. (Refer to Section D, items 5, 6, 7, and 8) The quantities are to be given for each sewer receiving the discharge. Place an asterisk on any outfall discharging to a storm drain or surface course and give the NPDES Outfall Number and NPDES Permit Number.

Type Process (from D-7)	Discharge Quantity by Sewer Referenced in E-2						Total (Refer to D 5-7)
	1	2	3				
a. _____	_____	_____	_____	_____	_____	_____	_____
b. _____	_____	_____	_____	_____	_____	_____	_____
c. _____	_____	_____	_____	_____	_____	_____	_____
Sanitary	_____	_____	_____	_____	_____	_____	_____
Boiler	_____	_____	_____	_____	_____	_____	_____
Cooling	_____	_____	_____	_____	_____	_____	_____
Plant & Equip. Wash	_____	_____	_____	_____	_____	_____	_____
Retention Waste (From D-8)	_____	_____	_____	_____	_____	_____	_____
Other (Specify): _____	_____	_____	_____	_____	_____	_____	_____
Total (Refer to E-2)	_____	_____	_____	_____	_____	_____	_____
* NPDES Outfall No.	_____	_____	_____	_____	_____	_____	_____
**NPDES Permit No.	_____	_____	_____	_____	_____	_____	_____

3. Is any form of wastewater pretreatment utilized at this facility?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, check type of device:

- Silver Recovery System       Ultra Membrane Filtration
- Grease Trap (In Ground)       Detention/Flow Equalization Basin
- Oil/Water Separator       pH Adjustment
- Grease Interceptor       Other

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Description and location of device(s) mentioned above: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If the facility has any of the above-mentioned pretreatment devices, how often is it serviced and by whom (please include individual name, company name, address, phone number and last date of service)?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Does this facility have a parts washer? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, is the waste produced considered a Hazardous Waste? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, how are the wastes disposed (please include individual name, company name, address, phone number and last date of service)? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

4. If any wastewater analyses have been performed on the wastewater discharges from your facilities, attach a copy of the most recent data to this questionnaire. Be sure to include the date of the analysis, name of the laboratory performing the analysis, and location(s) from which the sample(s) were taken (Attach sketches, plans, etc., as necessary).

5. Priority Pollutant Information: Please indicate by placing an "X" in the appropriate box by each listed chemical whether it is "Suspected to be Absent," "Known to be Absent," "Suspected to be Present," or "Known to be Present" in your manufacturing or service activity or generated as a by-product. (Some compounds are known by other names.

An asterisk notes those compounds (\*).

Item No.	Chemical or Compound	Suspected Absent	Known Absent	Suspected Present	Known Present
1.	Asbestos (fibrous)				
2.	Cyanide (total)				
3.	Antimony (total)				
4.	Arsenic (total)				
5.	Beryllium (total)				
6.	Cadmium (total)				
7.	Chromium (total)				
8.	Copper (total)				
9.	Lead (total)				
10.	Mercury (total)				
11.	Nickel (total)				
12.	Selenium (total)				
13.	Silver (total)				
14.	Thallium (total)				
15.	Zinc (total)				
16.	Acenaphthene				
17.	Acenaphthylene				
18.	Acrolein				
19.	Acrylonitrile				
20.	Aldrin				
21.	Anthracene				
22.	Benzene				
23.	Benzidine				
24.	Benzo (a) anthracene*				
25.	Benzo (a) pyrene*				
26.	Benzo (b) fluoranthene				

Item	Suspected	Known	Suspected	Known
No. Chemical Compound	Absent	Absent	Present	Present
27. Benzo (g, h, I) perylene*				
28. Benzo (k) fluoranthene*				
29. a-BHC (alpha)				
30. b-BHC (beta)				
31. d-BHC (delta)				
32. g-BHC* (gamma)				
33. Bis (2-chloroethyl) ether*				
34. Bis (2-chloroethoxy) methane*				
35. Bis (2-chloroisopropyl) ether*				
36. Bis (chloromethyl) ether*				
37. Bis (2-ethylhexyl) phthalate*				
38. Bromodichloromethane*				
39. Bromoform*				
40. Bromomethane*				
41. 4-Bromophenylphenyl ether				
42. Butylbenzyl phthalate				
43. Carbon tetrachloride*				
44. Chlordane				
45. 4-Chloro-3-methylphenol*				
46. Chlorobenzene				
47. Chloroethane*				
48. 2-Chloroethylvinyl ether				
49. Chloroform				
50. Chloromethane*				
51. 2-Chloronaphthalene				
52. 2-Chlorophenol*				
53. 4-Chlorophenylphenyl ether				
54. Chrysene*				
55. 4,4'-DDD*				
56. 4,4'-DDE*				
57. 4,4'-DDT*				
58. Dibenzo (a, h) anthracene*				
59. Dibromochloromethane*				
60. 1,2-Dichlorobenzene*				

Item	Suspected	Known	Suspected	Known
No. Chemical or Compound	Absent	Absent	Present	Present
61. 1,3-Dichlorobenzene*				
62. 1,4-Dichlorobenzene*				
63. 3,3'-Dichlorobenzidine				
64. Dichlorodifluoromethane*				
65. 1,1-Dichloroethene*				
66. 1,2-Dichloroethene*				
67. 1,1-Dichloroethene				
68. Trans-1,2-dichloroethene*				
69. 2,4-Dichlorophenol				
70. 1,2-Dichloropropane*				
71. (cis & trans) 1,3-Dichloropropene*				
72. Dieldrin				
73. Diethyl phthalate*				
74. 2,4-Dimethylphenol*				
75. Dimethyl phthalate				
76. Di-n-butyl phthalate				
77. Di-n-octyl phthalate*				
78. 4,6-Dinitro-2-methylphenol*				
79. 2,4-Dinitrophenol				
80. 2,4-Dinitrotoluene				
81. 2,6-Dinitrotoluene				
82. 1,2-Diphenylhydrazine*				
83. Endosulfan I*				
84. Endosulfan II*				
85. Endosulfan sulfate				
86. Endrin				
87. Endrin aldehyde				
88. Ethylbenzene				
89. Fluoranthene				
90. Fluorene*				
91. Heptachlor				
92. Heptachlor epoxide				
93. Hexachlorobenzene*				
94. Hexachlorobutadiene				

Item	Suspected	Known	Suspected	Known
No. Chemical or Compound	Absent	Absent	Present	Present
95. Hexachlorocyclopentadiene*				
96. Hexachloroethane*				
97. Indeno(1,2,3,-cd)pyrene*				
98. Isophorone*				
99. Methylene chloride*				
100. Naphthalene				
101. Nitrobenzene				
102. 2-Nitrophenol*				
103. 4-Nitrophenol*				
104. N-nitrosodimethylamine*				
105. N-nitrosodi-n-propylamine*				
106. N-nitrosodiphenylamine*				
107. PCB-1016*				
108. PCB-1221*				
109. PCB-1232*				
110. PCB-1242*				
111. PCB-1248*				
112. PCB-1254*				
113. PCB-1260*				
114. Pentachlorophenol				
115. Phenanthrene				
116. Phenol				
117. Pyrene				
118. 2,3,7,8-Tetrachlorodibenzo-p-dioxin*				
119. 1,1,2,2-Tetrachloroethane*				
120. Tetrachloroethene*				
121. Toluene*				
122. Toxaphene				
123. 1,2,4-Trichlorobenzene				
124. 1,1,1-Trichloroethane*				
125. 1,1,2-Trichloroethane*				
126. Trichloroethene*				
127. Trichlorofluoromethane*				
128. 2,4,6-Trichlorophenol				



EVALUATION TO DETERMINE NEED FOR  
SLUG DISCHARGE CONTROL PLAN  
[Reference 40 CFR 403.8(f)(2)(v)]

Facility: Ashland Inc.

SIC Code: 2821 NACIS #: 325211

Industrial Wastewater Discharge Permit (IWDP) #: 86-02-01

**Part 1. Does Permittee / Significant Industrial User have a Slug Discharge Control Plan (SDCP)?**

Yes  Go to Part 2

No  Go to Part 3

**Part 2. Is the SDCP adequately controlling slug discharges?**

Yes  No change needed

No  Requires an Upgraded SDCP (Go to Part 3)

**Part 3. Does the Permittee Require a SDCP?** JWU must evaluate at least once every two years whether a Permittee (SIU) requires a plan to control slug discharges. A slug discharge is defined as any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge. This determination will be made based on the following factors.

1. Does the compliance history indicate whether a SDCP is necessary? N/A  Yes  No
2. Has a slug discharge occurred that necessitated the requirement of a SDCP? N/A  Yes  No
3. Has the POTW violated any permits / regulations caused by the Permittee? N/A  Yes  No
4. Are there any other factors that indicate a SDCP is required? N/A  Yes  No   
If yes, describe on separate sheet & attach:
5. Did the most recent inspection indicate a need for a SDCP? Yes  No
6. Has JWU determined that the Permittee requires a SDCP? N/A  Yes  No

Answering yes to any Part 3 question, requires the Permittee to submit a Slug Discharge Control Plan to JWU for approval.

Date of Evaluation: 11/13/2012 Signature: Mike Dupa

A-17/26

**Baseline Monitoring Report (BMR)**  
**Contents as required by 40 CFR 403**

1. Identifying Information – This section must include the users name and address of the facility including the facility owners and operators.
2. Permits - The BMR must contain a list of all environmental permits held by the facility.
3. Description(s) of Operations – This section must contain a brief description of the nature, average rate of production, and the Standard Industrial Classification (SIC) and the National (NACIS) of the user. This section should also include a schematic process (es) diagram, which indicates points of discharge to the sanitary sewer from the process (es) regulated by the category.
4. Flow Measurement – This section must contain information on the average daily and maximum daily flow in gallons per day from all regulated process wastestreams and any other nonregulated wastestreams.
5. Measurement of Pollutants – This section requires that you collect a sample in proportion to the flow for all pollutants regulated by the category. For those pollutants, which are not suitable for composite sampling (cyanide, volatile organic compounds, oils and greases, pH, and Phenolics), a minimum of four grab samples must be collected. These samples must be collected during normal operations and representative of normal operations. This section requires that the following information must be submitted with the BMR sample results: the sample date(s), time when sample(s) collected, description of location where sample was collected, the method used to analyze the sample (must be an EPA approved method for water analysis), and a statement certifying that all sampling and analysis were performed according to EPA standards and is representative of normal work cycles and expected pollutant discharges.
6. Certification – This section requires that the BMR be certified by the authorized representative of the facility and by a qualified professional. This certification must state whether or not the pretreatment standards (if applicable) are being met on a consistent basis. Jacksonville Wastewater Utility reserves the right of approval for the qualified professional based upon the individuals qualifications.
7. Compliance Schedule – If the BMR indicates that pretreatment standards (if applicable) are not being met, and then the BMR must contain a compliance schedule designed to achieve consistent compliance with pretreatment standards.



## Industrial User Baseline Monitoring Report

Instructions: Please complete this form in as much detail as possible. Include additional information on attached sheets as necessary. Refer to the supplemental instructions and return this report to the address shown in the instructions.

### 1. Company Information

A. Legal Name: Ashland Inc.

Mailing Address: 1901 N. Redmond Rd.  
Jacksonville, AR 72076

B. Facility Name: Ashland Inc.

Legal Address: 1901 N. Redmond Rd.  
Jacksonville, AR 72076

C. Name of Owner(s): Ashland Inc.

D. Name of Operator(s): \_\_\_\_\_

E. Facility Contact (Please provide the name, title, phone number, and e-mail address of a designated person as a contact person for permit issues or if additional information is necessary.): Mike Taylor - EHS

501-533-6112 wmtaylor@ashland.com

F. Total Number of Employees: 45 Admin. 13 Prod. 32

G. Number of Shifts: 2 Hrs. of Shifts: 12

H. Total Months in Operation Last Year: 12

I. Total Years in Operation at Present Site: 1973

J. Provide the name of the publicly owned treatment works that received the wastewater discharges from this facility. If this facility is not connected to a sewerage system, describe where wastewater is discharged.

Jacksonville Wastewater Utility

2. Nature of Operation

A. List Raw Materials Used: Phthalic + Maleic Anhydride, Styrene, Glycols, Dicyclopentadiene

B. List Chemicals Used: See above for chemicals used to produce unsaturated polyester resin.

C. Describe Manufacturing or Service Activities Conducted and Final Product(s): Manufacturing of unsaturated polyester resin

D. Summarize Each Regulated Process (include Process Description, Production Rate, Pretreatment Standards Category(s), 40 CFR Subpart, SIC/NACIS Code(s):  
Process Description, Production Rate, Pretreatment Std, Category 40 CFR Subpart SIC Code 2821 NACIS Code 325211 Manufacture Un-Saturated polyester resin.

The raw materials listed above are placed in a kettle. Then heat is applied in order to complete the reaction between the above chemicals to form polyester resin.

3. Wastewater Flow

A. Total Plant Flow in Gallons Per Day (gpd):

Average: 3,000

Maximum: 25,000

B. Individual Process Flows in Gallons Per Day (gpd): (Continuous, Batch or None)

Regulated Process Avg. Flow Rate (gpd) Max. Flow Rate (gpd) Type of Discharge

N/A

Unregulated Process Avg. Flow Rate (gpd) Max. Flow Rate (gpd) Type of Discharge

Municipal Sewer

Sinks

Restrooms

Cooling + Heating Systems

3,000

Batch

Cooling Water: \_\_\_\_\_

Sanitary Wastewater: \_\_\_\_\_

C. Provide on a separate sheet:

- 1.) A schematic drawing or flow chart of each regulated process that generates wastewater.
- 2.) A schematic drawing showing **all** wastewater flows (regulated and unregulated), location of any treatment system, and sampling locations.

**4. Nature and Concentration of Pollutants**

**A. Analysis of Regulated Process Flows**

The industrial user must perform sampling and analysis of the effluent from all generated processes (after treatment, if possible). Provide the analytical data for the regulated processes flows in the spaces provided below. Attach additional sheets if necessary. Only those pollutants specifically regulated by the applicable category need be reported.

Regulated Process(s): N/A

mg/L	pH	BOD <sub>5</sub>	TSS	O&G	Phenols	CN-	Cd(t)	Cr(t)	Cu(t)	Pb(t)	Ni(t)	Ag(t)	Zn(t)
1Avg.													
1Max.													
2Avg.													
2Max.													
3Avg.													
3Max.													

Sample(s) Location: N/A

Sample Type(s): (composite samples are required except where not feasible) N/A

Number of Samples and Frequency Collected: N/A

Analytical Methods Used: N/A

**B. Analysis of Total Plant Flow (if applicable)**

An Industrial User may sample and analyze the total plant flow and calculate an equivalent concentration limit using the combined wastestream formula if regulated process flows are mixed with other flows prior to treatment and/or sampling. Record the analytical results for all regulated pollutants below. Record the calculated concentration limits as well as the actual measured concentrations.

mg/L	pH	BOD <sub>5</sub>	TSS	O&G	Phenols	CN-	Cd(t)	Cr(t)	Cu(t)	Pb(t)	Ni(t)	Ag(t)	Zn(t)
MEC*													
AEC*													
AMMC*													
AMA*													

Sample Location: N/A

Sample Type(s): (composite samples are required except where not feasible) N/A

Number of Samples and Frequency Collected: N/A

Analytical Methods Used: N/A

\* MEC – Maximum Equivalent Concentration (derived through the combined wastestream formula)  
 \* AEC – Average Equivalent Concentration (derived through the combined wastestream formula)  
 \* AMMC – Actual Measured Maximum Concentration  
 \* AMA – Actual Measured Average

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**5. Wastewater Treatment**

Briefly describe any and all wastewater treatment utilized (show treatment system location) in relation to process flows on schematic drawing, as required by question 3.C.

n/a

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**6. Environmental Control Permits**

Describe all environmental control permits held by or for the Facility.

Type & Title of Permit	Permit Number	Issuing Agency	Expiration Date
NPDES Permit	ARR000000	ADEQ	6/30/2014
Air Permit	0821-AR-13	ADEQ	n/a

**7. Compliance Certification**

- A. Is the facility meeting the applicable categorical pretreatment standards on a consistent basis? Yes \_\_\_\_\_ No \_\_\_\_\_ N/A X
- B. If no, do you require:
  - 1.) Additional operation and maintenance (O&M) to achieve compliance? Yes \_\_\_\_\_ No \_\_\_\_\_
  - 2.) New or additional pretreatment facilities to achieve compliance? Yes \_\_\_\_\_ No \_\_\_\_\_
- C. If additional O&M or new or additional pretreatment will be required to meet categorical pretreatment standards on a consistent basis, attach a schedule on a separate sheet projecting increments of progress indicating dates for the commencement and completion of major events leading to compliance with the standard. **Note:** the final compliance date in this schedule shall not be later than the compliance date for the applicable pretreatment standard. Written progress reports are required within 14 days of each of the compliance dates specified in the compliance schedule.

**8. Signatory Requirement**

I certify under penalty of law that I have personally examined and am familiar with the information in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

RALPH SMITH

Name of Authorized Representative (Please Print)



Signature

Plant Manager

Official Title (Please Print)

11/12/12

Date of Signing

## Hazardous Waste Notification Requirement

The Arkansas Department of Environmental Quality (ADEQ) is requiring all wastewater utilities in the state of Arkansas, including Jacksonville Wastewater Utility (JWU), to notify certain sewer customers of Federal Regulations relating to hazardous wastes. At this time, the ADEQ is specifically requiring our notification of businesses who dispose of the following into the JWU collection system: hazardous waste pharmaceuticals, mercury from amalgam, and/or silver from spent film processing wastes. If your business is not involved in the disposal of any of these materials listed, please notify our office in writing at: Pretreatment Coordinator, Jacksonville Wastewater Utility, 248 Cloverdale Rd, Jacksonville, Ar. 72076. Please respond within thirty (30) days of receipt of this document.

However, if you are involved in the disposal of hazardous waste pharmaceuticals, mercury from amalgam, and/or silver from spent film processing wastes into JWU's collection system; please be advised of the following regulations and requirements.

Under the specific pretreatment requirement in **40 CFR 403.12(p) (1)**, "The Industrial User [non-domestic user] shall notify the Publicly Owned Treatment Works (POTW) or appropriate City wastewater official, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261."

Under **40 CFR 403.12(p)(4)**, "In the case of any notification made under paragraph (p) of this section, the Industrial User shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree that it has determined to be economically practical." You can find the full requirement with exemptions at the following website address: [http://edocket.access.gpo.gov/cfr\\_2003/julqtr/40cfr403.12.htm](http://edocket.access.gpo.gov/cfr_2003/julqtr/40cfr403.12.htm).

Please be advised that if your facility does not have an amalgam separator, silver recovery unit, or system of properly disposing of hazardous waste pharmaceuticals, you may be discharging hazardous waste into JWU's collections system and must follow the above-cited Federal Regulation.

Therefore, if you dispose of hazardous waste pharmaceuticals, mercury from amalgam, and/or silver from spent film processing wastes into JWU's collection system, please submit the required notifications to the following:

- ◆ Pretreatment Coordinator, Jacksonville Wastewater Utility, 248 Cloverdale Road Jacksonville, AR 72076
- ◆ US EPA REGION 6, 1445 Ross Avenue, Suite 1200, Code:6PD, Dallas, TX 75202-2733
- ◆ ADEQ Hazardous Waste Chief, 5301 Northshore Drive, North Little Rock, AR 72118-5317

Failure to comply with the notification requirements outlined above shall result in an inspection of your facility. If you require any additional information, concerning this letter, please call me at (501) 982-0581.

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Hazardous Waste Certification Statement

Business Name: Ashland Inc.

Physical Address 1901 N Redmond Rd  
Jacksonville, AR 72076

Owner of business: Ashland Inc.

1) I certify that we do not generate hazardous waste as identified under 40 CFR 261.  
Yes  No

2) I certify that we do generate hazardous waste as identified under 40 CFR 261 but either:  
 DO NOT discharge this waste to Jacksonville Wastewater Utility's Collection system.

-or-

DO discharge this hazardous waste to Jacksonville Wastewater Collection system.

The accompanying certification statement must be signed by a duly authorized representative of your business:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

RALPH SMITH Plant Manager  
Print name and title

[Signature] 11/12/12  
Signature and date

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**JACKSONVILLE WASTEWATER UTILITY**  
**INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.**

**86-02-01**

In accordance with all terms and conditions of Jacksonville City Ordinance No. 1360,  
and also with any applicable provisions of Federal or State law or regulation:

Permission is hereby granted to **Ashland Inc.**


Classified by SIC No. **2821** or NIACS No. **325211**

For the contribution of Industrial Wastewater into the Jacksonville Wastewater Utility  
sewer lines at **1901 North Redmond Road, Jacksonville, Arkansas.**

This Permit is granted in accordance with the application filed on **November 14, 2012**  
at the office of Jacksonville Wastewater Utility and in conformity with plans,  
specifications and other data submitted to the Jacksonville Wastewater Utility in support  
of the above application. All of which are filed with and considered as part of this permit,  
together with the following named conditions and requirements.

Effective this **1<sup>st</sup> day of January 2013**

To expire **31<sup>st</sup> day of December 2016**

  
\_\_\_\_\_  
General Manager,  
Jacksonville Wastewater Utility

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**PART I: LIMITATIONS**

1. The Permittee shall not discharge any waters regulated by the Organic Chemical, Plastics and Fibers Category (40 CFR 414) without prior approval from the Utility. Any request to discharge waters regulated by the Organic Chemical, Plastics, and Fibers Category will result in a permit modification before any of these waters can be discharged.

Parameters	Daily Max. (mg/L)	Max. Monthly Average (mg/L)	Monitoring Requirements (E, SC, S)
Biochemical Oxygen Demand (5-Day)	-----	250.0 *1	SC, S 2*
Total Suspended Solids	-----	250.0 *1	SC, S 2*
Oil & Grease	-----	100.0 *1	SC, S 2*
Cadmium	0.160	0.160	E, S 2*
Chromium	2.000	2.000	E, S 2*
Copper	1.220	1.220	E, S 2*
Cyanide	0.190	0.190	E, S 2*
Lead	0.220	0.220	E, S 2*
Nickel	2.010	2.010	E, S 2*
Silver	0.410	0.410	E, S 2*
Zinc	1.510	1.050	E, S 2*
Cyanide	0.190	0.190	E, S 2*
Acenaphthene	0.047	0.019	E, S 2*
Anthracene	0.047	0.019	E*S 2*
Benzene	0.134	0.057	E*S 2*
Bis(2-ethylhexyl)phthalate	0.258	0.095	E*S 2*
Carbon Tetrachloride	0.380	0.142	E*S 2*
Chlorobenzene	0.380	0.142	E*S 2*
Chloroethane	0.295	0.110	E*S 2*
Chloroform	0.325	0.111	E*S 2*
Di-n-butyl phthalate	0.043	0.020	E*S 2*
1,2-Dichlorobenzene	0.794	0.196	E*S 2*
1,3-Dichlorobenzene	0.380	0.142	E*S 2*
1,4-Dichlorobenzene	0.380	0.142	E*S 2*
1,1-Dichloroethane	0.059	0.022	E*S 2*
1,2-Dichloroethane	0.574	0.180	E*S 2*
1,1-Dichloroethylene	0.060	0.022	E*S 2*
1,2-trans-Dichloroethylene	0.066	0.025	E*S 2*
1,2-Dichloropropane	0.794	0.196	E*S 2*
1,3-Dichloropropylene	0.794	0.196	E*S 2*
Diethyl phthalate	0.113	0.046	E*S 2*

Dimethyl phthalate	0.047	0.019	E*S	2*
4,6-Dinitro-o-cresol	0.277	0.078	E*S	2*
Ethylbenzene	0.380	0.142	E*S	2*
Flouranthene	0.054	0.022	E*S	2*
Flourene	0.047	0.019	E*S	2*
Hexachlorobenzene	0.794	0.196	E*S	2*
Hexachlorobutadiene	0.380	0.142	E*S	2*
Hexachloroethane	0.794	0.196	E*S	2*
Methyl Chloride	0.295	0.110	E*S	2*
Methylene Chloride	0.170	0.036	E*S	2*
Naphthalene	0.047	0.019	E*S	2*
Nitrobenzene	6.402	2.237	E*S	2*
2-Nitrophenol	0.231	0.065	E*S	2*
4-Nitrophenol	0.576	0.162	E*S	2*
Phenanthrene	0.047	0.019	E*S	2*
Pyrene	0.048	0.020	E*S	2*
Tetrachloroethylene	0.164	0.052	E*S	2*
Toluene	0.074	0.028	E*S	2*
1,2,4-Trichlorobenzene	0.794	0.196	E*S	2*
1,1,1-Trichloroethane	0.059	0.022	E*S	2*
1,1,2-Trichloroethane	0.127	0.032	E*S	2*
Trichloroethylene	0.069	0.026	E*S	2*
Vinyl Chloride	0.172	0.097	E*S	2*
Flow		REPORT ONLY		3*
pH Maximum (instantaneous)	11.0	S.U.	E, S	
pH Minimum (instantaneous)	5.0	S.U.	E, S	

E – Enforcement Monitoring  
 SC – Surcharge Monitoring \*1  
 S – Self-Monitoring

\*1. Exceedances of these parameters are not considered a violation by the City of Jacksonville, Ordinance 1360, unless they cause the Treatment Plant Head Works to exceed these levels. Exceedances of these parameters are subject to surcharge.

\*2 Samples for this parameter shall be collected using the grab method.

\*3 The volume (flow) discharged from the collection tank shall be determined by use of an in-line metering device, that has recording and totalizing capabilities.

**PART II: MONITORING REQUIREMENTS**

1. The Utility may conduct any monitoring that the utility deems necessary to verify that Ashland Chemical is not discharging any waters regulated by the Organic Chemical, Plastics, and Fibers Category (40 CFR 414).

2. The Permittee and the Utility will monitor the discharge from the collection tank located at the North Central area of the facility. The Utility monitoring point shall be a side valve mounted on the collection tank, after proper mixing has occurred prior to discharge of the monitoring tanks into the sanitary sewer and the secondary site is a private manhole (which receives the flow from the discharge of the collection tank) located approximately 10 feet to the east of this tank. This private manhole discharges into the sanitary sewer at manhole number 1596. The Permittee shall monitor from the side valve installed in the tank after proper mixing has occurred prior to discharge of the monitoring tanks into the sanitary sewer. The monitoring will be performed at the frequency specified. All samples shall be grab samples unless otherwise indicated. The Permittee will not discharge any water from any process operation to the sanitary sewer.

BOD	-1 samples per year
TSS	-1 samples per year
O&G	-1 samples per year
Cd (t)	-1 sample per permit duration
Cr (t)	-1 sample per permit duration
Cu (t)	-1 sample per permit duration
Pb (t)	-1 sample per permit duration
Ni (t)	-1 sample per permit duration
Ag (t)	-1 sample per permit duration
Zn (t)	-1 sample per permit duration
Cyanide	-1 sample per permit duration
pH	-1 sample every discharge
Styrene	-1 samples per year
Ethylene Glycol	-1 samples per year
Maleic Anhydride	-1 samples per year
Phthalic Anhydride	-1 samples per year
Dicyclopentadiene	-1 samples per year
Volatiles	-1 sample per permit duration
Base Neutrals/Acid Compounds	-1 sample per permit duration

3. All sample collection, handling, preservation and analysis shall be performed by an ADEQ-certified laboratory unless they are performed by the Permittee. Designated laboratories shall be subject to Jacksonville Wastewater Utility approval.

4. All sample handling, preservation, equipment, sample container, holding time, analysis, and quality control procedures shall be in accordance with approved and current EPA procedures and requirements.

**PART III: REPORTING REQUIREMENTS / SPECIAL CONDITIONS**

1. SPILL / SLUG CONTROL

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A. In case of an accidental discharge (spill, slug, dangerous discharge, or etc...), the Jacksonville Wastewater Utility Pretreatment Coordinator/Laboratory Department must be notified **immediately**, by telephone, at 982-0581. If after regular business hours, leave a message with the answering service, which will notify the proper Utility personnel. Message shall include location of accidental discharge, type of waste, concentration and volume of discharge (spill, slug, dangerous discharge, or etc...). and phone number of Permittee employee who has knowledge of the spill.  
(City of Jacksonville, Ordinance No. 1360 – Section 13.24.15.E.2,3)

B. A notice shall be permanently posted on the Permittee’s bulletin board or other prominent place(s), advising employees of the notification procedure in the event of an accidental discharge. Permittee shall ensure that all employees who may cause or witness such a dangerous discharge are advised of the emergency notification procedure.  
(City of Jacksonville, Ordinance No. 1360 – Section 13.24.1.E.4)

C. Within five days of an accidental discharge, the Permittee shall submit to the Manager of Jacksonville Wastewater Utility, a detailed written report describing the cause of the discharge and the measures to be taken by the Permittee to prevent future incidents. (City of Jacksonville, Ordinance No. 1360 – Section 13.24.1.E.3)

2. REPORTING REQUIREMENTS

A. The Permittee will submit monthly reports to the Utility indicating that no waters regulated by the Organic Chemicals, Plastics, and Fibers Category (40 CFR 414) were discharged to the sanitary sewer. These reports are due to the offices of Jacksonville Wastewater Utility by the last day of the month for all discharges in the previous month. The report must contain the results of all samples collected during the month and a signed statement, by either the primary or secondary contact person, that all sampling and analysis was performed according to EPA regulations and performed by an ADEQ approved laboratory. The first monthly self-monitoring report will be due **February 29, 2013** for samples collected and/or discharges occurring in **January 2013**. (40 CFR 403.12) If any report is received 45 days beyond the required date of date of submittal, a violation shall be determined and will result in the industry being determined SNC (Significant Non-Compliant). (40 CFR 403.8(f)(2)(viii)(F))

B. The Permittee shall notify the Utility’s Pretreatment Coordinator/Laboratory Department, by telephone, within one (1) business day of becoming aware of any violation of the conditions of this permit.  
(40 CFR 403.12.G.2)

C. The Permittee shall notify the Utility prior to the introduction of new wastewater or pollutants, any substantial change in the volume or characteristic of the wastewater being discharged to the sanitary sewer, or any new construction or process

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modifications involving plumbing changes. This notification shall be written and the Permittee must receive the Utility's approval before the changes can occur.  
(City of Jacksonville, Ordinance No. 1360 – Section 13.24.20.4)

D. All reports required by this permit must be signed by either the owner, general partner, a principal executive officer of at least the level of vice president, or a responsible individual who has received written delegation of this authority from either the owner, general partner, or a principal executive officer of at least the level of vice president. (40 CFR 403.12 (k))

E. The Permittee shall notify the utility of the release of a slug load. A slug load is any release of pollutants at a flow rate or concentration, which would cause the Permittee to violate any of the limitations contained in this permit, in 40 CFR 414 or the General Discharge Prohibitions contained in the City of Jacksonville Ordinance No. 1360. This notification shall be made immediately by telephone, **982-0581**. The notification shall include the corrective actions to be taken to prevent further discharge of the slug load, the name of the responsible party on site, and a telephone number of the individual reporting the slug load. The verbal notification must be followed by a detailed written report, to be submitted, within five days of the discharge. (40 CFR 403.12. (g))  
(City of Jacksonville, Ordinance No. 1360- Section 13.24.15.2,3)

### 3. SPECIAL CONDITIONS

A. If the Permittee experiences a violation of any of the Pretreatment Limitations specified in Part I of this Permit, then the Permittee will resample for that pollutant within 30 days, unless the Permittee has sampled for that parameter since the violation. The resampling report shall be reviewed for continued violations and be sent to Jacksonville Wastewater Utility for determination of return to compliance status.  
(40 CFR 403.12 (g))

## PART IV: STANDARD CONDITIONS

1. The Permittee shall comply with all general prohibitive discharge standards in the City of Jacksonville Ordinance No. 1360 – Section 13.24.09.
2. Rights of Entry – The Permittee shall allow duly authorized representatives of the Utility, bearing proper credentials and identification, to enter the premises at reasonable hours for the purpose of inspecting, sampling or record inspection. Reasonable hours are considered anytime the Permittee is operating any process, which results in the discharge of wastewater to the sanitary sewer.  
(City of Jacksonville, Ordinance No. 1360 – Section 13.24.25.3)
3. Records Retention – The Permittee shall retain all records relative to monitoring, analysis, and operations of any process or treatment system, which results in the discharge of wastewater to the sanitary sewer for a minimum of three (3) years.  
(40 CFR 403.12 (1)) (City of Jacksonville Ordinance No. 1360- Section 13.24.18.5.g.h)
4. Dilution – The Permittee shall not increase the use of potable waters or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in Part I of this permit.  
(City of Jacksonville Ordinance No. 1360 – Section 13.24.13)
5. Non-transferability – This permit is issued to a specific Permittee for a specific operation and is not assignable to another discharger or transferable to any other location without the prior written approval of the Utility.  
(City of Jacksonville, Ordinance no. 1360 – Section 13.24.18.8)
6. Permit Modification – (a) The terms and conditions of this permit are subject to modification by the Utility at any time in response to changes in the City of Jacksonville Ordinance No. 1360, modification or promulgation of any federal regulation including promulgation of new Categorical Pretreatment Standards, State of Arkansas Regulation, and/or issuance of special or administrative orders, (b) Any permit modifications which result in new conditions or limitations will include a reasonable time schedule for compliance, if necessary. (City of Jacksonville, Ordinance No. 1360- Section 13.24.18.7)
7. Permit Revocation – This permit may be revoked by the Utility if it is determined that the Permittee has violated any provision of this permit, City of Jacksonville Ordinance No. 1360, State of Arkansas regulations, or EPA regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any report required by this permit shall be cause for permit revocation.  
(City of Jacksonville, Ordinance No. 1360- Section 13.24.28.2)

8. Penalties – Failure to resolve any violation of this permit, City of Jacksonville Ordinance No. 1360, State of Arkansas regulation, or EPA regulation may result in the Utility seeking applicable fines and penalties as outlined in City of Jacksonville Ordinance No. 1360 – Section 13.24.29.
9. Severability – The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby. (City of Jacksonville, Ordinance No. 1360-Section 13.24.29.5)
10. Property Rights – The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of federal, state or local regulation. (City of Jacksonville, Ordinance No. 1360- Section 13.24.25.3)
11. Proper Disposal of Pretreatment Sludge and Spent Chemicals – The Permittee shall dispose of any sludge or spent chemicals in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act. (40 CFR 403.8 (f) (iii))
12. Confidentiality – All reports and data related to the requirements of the permit shall be available for public inspection at the Jacksonville Wastewater Utility, 248 Cloverdale Road, Jacksonville, Arkansas, except for that information that is deemed confidential in accordance with the provisions of the City of Jacksonville Ordinance No. 1360 – Section 13.24.2.1
13. Permit Expiration – This permit comes due for review on **January 1, 2016**. The Permittee must reapply for re-issuance of the permit at least 180 days prior to the expiration date. The Utility will notify the Permittee of this responsibility 90 days before the reapplication date. (City of Jacksonville, Ordinance No. 1360 – Section 13.24.18.6)



This signature serves as record of receipt of this document by the individual whose signature appears below.

Document Name/Description- 1. Industrial Wastewater Discharge Fact Sheet  
2. Application for Ind. Discharge Permit  
3. Industrial User's Survey  
4. Baseline Monitoring Report  
5. Hazardous Waste Notification Requirement

This document is dated: 10-9-12

Delivery date: 10-9-12

Facility Representative Name (Print) Mike Taylor

Facility Representative Name (Signature) Mike Taylor

Delivered by:

JWU Representative (Print) KEVIN MCGILL

JWU Representative (Signature) KMCGILL

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**JACKSONVILLE WASTEWATER UTILITY**  
**INDUSTRIAL WASTEWATER DISCHARGE PERMIT FACT SHEET**

**Industry Name:** Ashland Inc.  
**Mailing Address** 1901 N Redmond Road  
Jacksonville, AR 72076  
**Facility Location:** Same as Above  
**Contact Person:** Mike Taylor  
**Title:** EHS&S  
**Telephone Number:** 501-533-6112  
**Fax Number:** 501-533-6101  
**E-Mail:** [wmtaylor@ashland.com](mailto:wmtaylor@ashland.com)  
**Secondary Contact Person:** Joe Jenko  
**Title:** OPS Manager  
**Telephone Number:** 501-533-6116  
**E-Mail:** [jdjenko@ashland.com](mailto:jdjenko@ashland.com)  
**Signatory Authority:** Ralph Smith  
**Title:** Plant Manager

**Environmental Permits Held:**

1. JWU Industrial Wastewater Discharge Permit #86-02-01
2. ADEQ Stormwater Permit #ARR000000
3. ADEQ Air Permit #0821-AR-13

Ashland Inc. manufactures unsaturated polyester resins (plastics) for various customers. These resins are custom blended for the customer and are shipped prior to catalysts (hardener or substance used to produce final product) being added. The customer adds the catalyst for the final stage of the plastic product.

Ashland Inc. wastewater is generated from domestic sources only. No process water is generated. The facility beginning in the July 2012 will not be required by Jacksonville Wastewater to sample its

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wastewater tank. The wastewater is stored in a large holding tank. When there is approximately 11,000 to 12,000 gallons collected in the holding tank, the contents of the tank is circulated and the PH checked electronically. If the PH in the tank is within permit limits, the tank contents are discharged to the sanitary sewer.

B-11/18

**JACKSONVILLE WASTEWATER UTILITY  
INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.**

**87-08-12**

In accordance with all terms and conditions of the City of Jacksonville Municipal Code -- Section 13. 24, and with any applicable provisions of Federal or State law, or regulation.

Permission is hereby granted to Little Rock Air Force Base

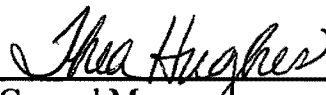
Classified by SIC No. 9711 NACIS No. 92811

For the contribution of Industrial Wastewater into the Jacksonville Wastewater Utility sewer lines at Little Rock Air Force Base Monitoring Flume on South Redmond Road.

This Permit is granted in accordance with the application filed on September 19, 2011 in the office of the Jacksonville Wastewater Utility and in conformity with plans, specifications and other data submitted to the Jacksonville Wastewater Utility in support of the above application. All of which are filed with and considered as part of this permit, together with the following named conditions and requirements.

Effective: First day of January 2012

Expires: Thirty -First day of December 2014

  
\_\_\_\_\_  
General Manager  
Jacksonville Wastewater Utility

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**PART I: LIMITATIONS**

1. The Permittee shall not exceed the effluent limitations stated below for all waters discharged through the Little Rock Air Force Base Monitoring Flume. The limitations below for the enforcement parameters (E) are based upon the proportion of the Permittee's flow to Jacksonville Wastewater Utility. Attached to this permit is a worksheet indicating how these enforcement parameters were derived.

Parameters	Max. 24-HR Flow Proportional Composite (lbs/day) *1	Max. Monthly Average (mg/L) *2	Monitoring Requirements (E, SC,S) *4
Biochemical Oxygen Demand (5-Day)	-----	250.0 *2	SC, S *4
Total Suspended Solids	-----	250.0 *2	SC, S *4
Oil & Grease	-----	100.0 *2	SC, S *3
Cadmium	0.265		E, S *4
Chromium	2.799		E, S *4
Copper	2.094		E, S *4
Arsenic	1.148		E, S *4
Cyanide	0.308		E, S *3
Lead	0.854		E, S *4
Mercury	0.00914		E, S *4
Nickel	3.095		E, S *4
Silver	0.592		E, S *4
Zinc	4.014		E, S *4
Flow (gal/day)		REPORT ONLY	S
Recoverable Phenols (total)		REPORT ONLY	S *3
pH Maximum (instantaneous)	11.0	S.U.	E, S *3
pH Minimum (instantaneous)	5.0	S.U.	E, S *3

E – Enforcement Monitoring  
 SC – Surcharge Monitoring \*2  
 S – Self-Monitoring

- \*1. (Lbs/day) = (concentration (mg/L)) X (daily flow MGD) X (8.34)
- \*2. Exceedances of these parameters are not considered a violation by the City of Jacksonville, Ordinance No. 1133, unless they cause the Treatment Plant Head Works to exceed these levels. Exceedances of these parameters are subject to surcharge.
- \*3. Samples for this parameter shall be collected using the grab method.
- \*4. Samples for this parameter shall be collected as composite samples (minimum of 4 parts over a 24-Hour period).

B-13/18

**PART II: MONITORING REQUIREMENTS**

1. The Utility will conduct surcharge and enforcement monitoring at a frequency subject to the discretion of the Utility. Samples collected for surcharge monitoring will be averaged with the samples collected by the permittee for the purpose of assessing a surcharge if applicable.

2. The Permittee will monitor the discharge/flow from Little Rock Air Force Base at the flow-monitoring flume and meter, located at South Redmond Road and east of the Jacksonville Animal Services Shelter, for the following pollutants at the frequency specified. All samples shall be 24-hour flow proportional composites with aliquots taken no more than 60 minutes apart unless otherwise indicated.

BOD <sub>5</sub>		-1 sample every month*
TSS		-1 sample every month*
O&G		-1 sample every month#
pH		-1 sample every month#
Cadmium	(total)	-1 sample every month*
Chromium	(total)	-1 sample every month*
Copper	(total)	-1 sample every month*
Lead	(total)	-1 sample every month*
Nickel	(total)	-1 sample every month*
Silver	(total)	-1 sample every month*
Zinc	(total)	-1 sample every month*
Arsenic	(total)	-1 sample every month*
Mercury	(total)	-1 sample every month*
Recoverable Phenols	(total)	-1 sample every month#
Cyanide	(total)	-1 sample every month#
Beryllium	(total)	-1 sample every 6 months*
Thallium	(total)	-1 sample every 6 months*
Antimony	(total)	-1 sample every 6 months*
Selenium	(total)	-1 sample every 6 months*
40 CFR 122:		-See note (□) below
□Volatiles		
□Acid Compounds		
□Base / Neutral		
□Pesticides		

\*-Denotes composite sample

#-Denotes grab sample

□-Denotes special sample collected by March 31, 2014

3. All sample collection, handling, preservation, and analysis must be performed by an ADEQ-certified laboratory. Designated laboratories shall be subject to Jacksonville Wastewater Utility approval.

4. All samples handling, preservation, equipment, sample container, holding times, analysis and quality control procedures shall be in accordance with approved and current EPA procedures and requirements.

B-14/18

**JACKSONVILLE WASTEWATER UTILITY**  
**INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.**

03-10-10

In accordance with all terms and conditions of Jacksonville City Ordinance No. 1360, and also with any applicable provisions of Federal or State law or regulation:

Permission is hereby granted to Two Pine Landfill

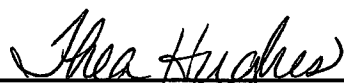
Classified by SIC No (s). 4953 and Classified by NACIS No(s). 562212 & 562219

For the contribution of Landfill Leachate, by pipeline, into the Jacksonville Wastewater Utility collection system to the J. Albert Johnson Regional Treatment Facility for treatment.

This Permit is granted in accordance with the application filed on January 24, 2013 in the office of the Jacksonville Wastewater Utility and in conformity with plans, specifications and other data submitted to the Jacksonville Wastewater Utility in support of the above application. All of which are filed with and considered as part of this permit, together with the following named conditions and requirements.

Effective this: February 11, 2013

To expire: February 11, 2016

  
\_\_\_\_\_  
General Manager,  
Jacksonville Wastewater Utility

B-15/18

**PART I: LIMITATIONS**

1. The quantity of leachate delivered by pipeline to JWU collection system shall not exceed 50,000 gallons per day {(pg. 3) / paragraph 3 per contract agreement 2011}. Jacksonville Wastewater Utility has established these discharge limits due to the completion of a local limits study. Compliance with the effluent limitations is required on the effective date of the permit.

Parameters	Daily Max. (mg/L)	Max. Monthly Average (mg/L)	Monitoring Requirements (E, SC, S)
Biochemical Oxygen Demand (5-Day)	-----	250.0 *1	SC, S
Total Suspended Solids	-----	250.0 *1	SC, S
Oil & Grease	-----	100.0 *1	SC, S
Arsenic	0.810	0.810	E, S
Cadmium	0.160	0.160	E, S
Chromium	2.000	2.000	E, S
Copper	1.220	1.220	E, S
Cyanide	0.190	0.190	E, S
Lead	0.220	0.220	E, S
Mercury	0.001	0.001	E, S
Nickel	2.010	2.010	E, S
Silver	0.410	0.410	E, S
Zinc	1.510	1.510	E, S
Flow		REPORT ONLY	
pH Maximum (instantaneous)	11.0	S.U.	
pH Minimum (instantaneous)	5.0	S.U.	

E – Enforcement Monitoring  
 SC – Surcharge Monitoring \*1  
 S – Self-Monitoring

\*1. Exceedances of these parameters are not considered a violation by the City of Jacksonville, Ordinance 1360, unless they cause the Treatment Plant Head Works to exceed these levels. Exceedances of these parameters are subject to surcharge.

**PART II: MONITORING REQUIREMENTS**

B-16/18



1. Representative sample shall be conducted from the monitoring building located next to the leachate collection holding tanks using a method that will provide a sample representative of the landfill and as described in Note 3. During the period beginning on the effective date of this permit and lasting through the date of expiration, the Permittee is authorized to discharge no more than 50,000 gallons per day, to the Jacksonville Wastewater Utility collection system without prior approval from the Utility. In the event of a pipeline failure, the Leachate Hauler must receive personal escort from the Utility to the disposal site. Samples taken in compliance with the monitoring requirements specified below shall be collected at the following location(s): leachate collection holding tanks. Such discharge(s) shall be limited and monitored by the Permittee as specified below (see notes 1, 2, and 3 below):

Parameters	Discharge Limitations		Monitoring Requirements (See Note 5)	
	Monthly Average	Daily Max	Jan. – Jun.	July – Dec.
Arsenic (Total)	0.810 mg/l	0.810 mg/L	One sample	One sample
Antimony (Total)	Report Only	Report Only	One sample	One sample
Barium (Total)	Report Only	Report Only	One sample	One sample
Beryllium (Total)	Report Only	Report Only	One sample	One sample
Boron (Total)	Report Only	Report Only	One sample	One sample
Cadmium (Total)	0.160 mg/L	0.160 mg/L	One sample	One sample
Chromium (Total)	2.0 mg/L	2.0 mg/L	One sample	One sample
Copper (Total)	1.220 mg/L	1.220 mg/L	One sample	One sample
Lead (Total)	0.220 mg/L	0.220 mg/L	One sample	One sample
Manganese (Total)	Report Only	Report Only	One sample	One sample
Molybdenum (Total)	Report Only	Report Only	One sample	One sample
Mercury (Total)	0.001 mg/L	0.001 mg/L	One sample	One sample

B-17/18

Parameters	Discharge Limitations		Monitoring Requirements (See Note 5)	
	Monthly Average	Daily Max	Jan. – Jun.	July – Dec.
Nickel (Total)	2.010 mg/L	2.010 mg/L	One sample	One sample
Selenium (Total)	Report Only	Report Only	One sample	One sample
Thallium (Total)	Report Only	Report Only	One sample	One sample
Silver (Total)	0.410 mg/L	0.410 mg/L	One sample	One sample
Zinc (Total)	1.510 mg/L	1.510 mg/L	One sample	One sample
Cyanide (Total)	0.190 mg/L	0.190 mg/L	One sample	One sample
Biochemical Oxygen Demand	250.0 mg/L	250.0 mg/L	One sample	One sample
Total Suspended Solids	250.0 mg/L	250.0 mg/L	One sample	One sample
Ammonia Nitrogen, as Nitrogen	Report Only	Report Only	One sample	One sample
pH	N /A	≥5.0 S.U. and ≤11.0 S.U.	One sample	One sample
Organic Toxic Pollutants (40 CFR 122, Appendix D, Table II) Volatiles, Acid Compounds, Base/Neutral, & Pesticides. (See note 4).	Report Only	Report Only	One sample	One sample
Additional Conventional and Nonconventional Pollutants (40 CFR 122, Appendix D, Table III) Oil and Grease & Total Recoverable Phenolics	Report Only	Report Only	One sample	One sample
TCLP Metals: Ag (t), As (t), Ba (t), Cd (t), Cr (t), Hg (t), Pb (t) & Se (t)	Report Only	less than regulatory levels listed in 40 CFR 261, Table I	One sample	One sample

**Notes:**

1. All sampling and analysis conducted to fulfill the requirements under this section shall be conducted during normal work cycles.

R-19/18

To: Ashland Inc. File  
From: Kevin McGill, Pretreatment Coordinator  
Subject: Annual Pretreatment Inspection 2012  
Date: June 28, 2012

On Wednesday, June 28, 2012, Kevin McGill, Pretreatment Coordinator, performed an Industrial Pretreatment Inspection at Ashland Inc., located at 1901 North Redmond Road. Mr. Mike Taylor, EH & S Engineer was the escort for the inspection. Ashland Inc. is a bulk storage and reactor plant, concerned with the manufacturing of styrene resins. According to the information obtained during the walk through inspection and a review of the information contained in Jacksonville Wastewater Utility (JWU) files, Ashland Inc. appears to be in compliance with their Industrial Wastewater Discharge Permit (IWDP).

No process wastewater is generated at this facility, except small quantities from the quality control laboratory. The majority of wastewater discharged to the sanitary sewer, is from domestic sources within the plant and office areas. All floor drains have been sealed. This eliminates the potential for spills to the sewer. All wastewater is collected in a holding tank with inline pH and flow monitoring equipment installed. This equipment was installed to aid in the detection of foreign substances (resins) into the waste stream. The tank is designated as the Sewer Holding Tank ( Tank # 11).

The quality control lab is the only source of non-domestic wastewater. Only small quantities used in testing are discharged. The wastewater from the plant and the quality control lab are pumped into a small pump station. It is here that it is pumped into the holding tank. When there is approximately 11,000 to 12,000 gallons collected in the holding tank, the contents of the tank is circulated and the pH checked electronically. If the pH in the tank is within permit limits, the tank contents are discharged to the sanitary sewer. A mini-valve, located on the side of the holding tank, is the site where the monitoring samples are collected by JWU and Ashland Inc. personnel.

All the hazardous waste from this plant is transported off-site by Ashland Distribution Company. This waste is shipped to a hazard waste facility.

After reviewing the results of the inspection and a phone conversation with Alan Gilliam, ADEQ state pretreatment coordinator, on June 16, 2012 it is my recommendation that Ashland Inc. be granted a zero process discharge permit.

Date: 6-28-2012

Signature: *KMSB*

**JACKSONVILLE WASTEWATER UTILITY  
INDUSTRIAL INSPECTION FORM**

**SECTION I. FACILITY INFORMATION**

**A. General Information (All Items Must Be Completed)**

1. Facility name: Ashland Inc
2. Service address: 1901 N. Redmond Road, Jacksonville AR 72076
3. Mailing address (if different): (Same)
4. Contact(s) & Title(s): Mike Taylor, EHS&S Engineer, Mr. Joe Jenko, Operations Manager & Mr. Ralph Smith, Plant Manager
5. Phone number(s): (501) 533-6100 (Ext # 6112 Marc J.) (Ext # 6129 John F.)
6. Water Works account #: A-1032210000
7. Environmental Permit(s):
  - a. RCRA: Large Quantity Generator
  - b. Air: 821-AR-10
  - c. Water: JWU: # 86-21-01 Storm water: ARR00B638 ??
8. Signatory Authority (Name & Title): Mr. John Ferrell, Plant Manager  
Marc Janis, EHS&S Engineer

**B. Sample Protocol Information**

1. SIC(s) Codes: #2821 NACIS: 325211
2. Days of Operation: 7 Days of Production: 7
3. Hours of Operation: 24 Hours of Production: 24
4. Number of Shifts: 2 Hrs-Shift 1: 6a/6p Hrs-Shift 2: 6p/6a Hrs-Shift : 12 hrs.
5. Number of Employees: 42 Production: 18 Administrative: 11 Maint. 5  
Lab : 5 Shipping and Receiving: 3
6. Seasonal Variations: N/A Peak Months: \_\_\_\_\_ Low Months: \_\_\_\_\_
7. Scheduled Plant Shutdowns: Holidays

**C. Records Review (Yes/No & Comment)**

1. Pretreatment System Operations Logs: N/A
2. Sample Results & Reports (IU Must Maintain for 3 Years): On File in Office  
(Mr. Marc Janis) EHS&S Engineer
3. Emergency Response & Spill Plan (Review for Changes): Updated Contacts  
being sent
4. Chemical Inventory (MSDS on new chemicals): No new bulk chemicals
5. Production Verification Records (for IUs with production-based standards- Record type, inclusive dates, production figures, etc.): N/A
6. Inform IU of need to inform ADPC&E of discharge of non-polluted waters and possible need for NPDES permit: I. U. has NPDES permit for discharge  
of non-contact cooling water.

Date: 6-28-2012

Signature: KMU

## SECTION II. FACILITY INSPECTION (Walkthrough Information)

### A. Process review

1. Process Name: Unsaturated & Thermosetting Polyester Resin Production
2. Location: Main Reservoirs are in Process Building
3. Description of Process: Blending of raw materials, into reactors, producing resin mixtures. These materials are stored for later shipping. End customer mixes resins and catalysts together to harden and form final product.
4. Raw Materials & Chemicals Used: Phthalic Anhydride, Maleic Anhydride, Styrene, Glycols, and Dicyclopentadiene.
5. Product & Possible Pollutants: Unsaturated Polyester Resins, and any domestic sewage flow stream
6. Destination of Wastewater from Process (sewer, treatment system, diverted): N/A, only domestic wastewater discharged to sanitary sewer
7. Are Management Practices Outlined in TOMP, Spill Control, or Other Plans Being Followed?: Yes
8. Comments: N/A
9. Sketch of Process, In File: Yes If No: Attach Diagram or Plan if Available: \_\_\_\_\_
10. Is There A Potential for Spills into Sewer?: No
11. Spill Prevention (Berms, Secondary Containment, and etc...): Slug and Spills control plan on file in permit file @ JWU
12. Is the Employee Notification Sign of Whom to Call in the Event of A Spill Posted? Yes

### B. Chemical Storage Area(s)

1. Location (s): South warehouse, for powdered resins. North plant area for liquid storage (tank farm). Smaller liquid storage in the north warehouse.
2. Chemical List & Volumes: 50 - 80 lb bags of various dry chemicals, 55-gallon drums for finished product
3. Is the employee notification sign of whom to call in the event of a spill posted?: Yes (employee bulletin boards)
4. Are employees in the area aware of spill containment, handling, and cleaning Procedures? Comments: Yes, annual and continual training provided by I.U. Annual recurring training tracked through a Learning Mgt System (computer web based training)
5. Spill Containment Area Assessment (attach sketch and comments): IU will send overhead plot plan.

**SECTION III INSPECTION SUMMARY**

**A. Action Items:**

List all corrective action, additional information, and communications or follow up action required as a result of the inspection and estimated completion date of each item.

Send copy of Inspection Report to Mike Taylor, upon approval and completion.

Follow-up Visit Required: Yes \_\_\_\_\_ No X

**B. Comments**

Inspectors Overall Assessment of the Industrial User and any General Comments.

Very professional organization. Very conscientious management team.



Inspector

6-28-2012

Date of Inspection

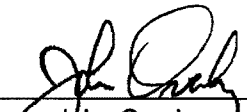


Ashland, Inc.  
ATTN: Mr. Mike Taylor  
1901 N. Redmond Road  
Jacksonville, AR 72076

This report contains the analytical results and supporting information for the sample submitted on April 12, 2012. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Laboratory Director or a qualified designee.

  
\_\_\_\_\_  
John Overbey  
Laboratory Director

This document has been distributed to the following:

PDF cc: Ashland, Inc.  
ATTN: Mr. Mike Taylor  
wmtaylor@ashland.com

D-1/3


 Ashland, Inc.  
 1901 N. Redmond Road  
 Jacksonville, AR 72076

**ANALYTICAL RESULTS**
**AIC No.** 156926-1

**Sample Identification:** 001, 002, 003, 004, 005, 006, 007, 008, 009 4/12 8:45

Analyte	Result	RL	Units	Qualifier
<b>BOD 5-day</b> SM 5210 B Prep: 13-Apr-2012 0853 by 271	<b>33</b> Analyzed: 18-Apr-2012 1011 by 271	<b>7</b>	<b>mg/l</b> Batch: W39526	<b>D</b> Dil: 6.7
<b>Total Suspended Solids</b> USGS 3765 Prep: 16-Apr-2012 0912 by 285	<b>73</b> Analyzed: 17-Apr-2012 0816 by 285	<b>20</b>	<b>mg/l</b> Batch: W39546	
<b>Ethylene glycol</b> EPA 8015C Prep: 16-Apr-2012 0815 by 295	<b>&lt; 10</b> Analyzed: 17-Apr-2012 0822 by 07	<b>10</b>	<b>mg/l</b> Batch: C15204	
<b>Oil and Grease</b> EPA 1664A Prep: 16-Apr-2012 0815 by 295	<b>7.1</b> Analyzed: 16-Apr-2012 1033 by 295	<b>5</b>	<b>mg/l</b> Batch: B7569	
<b>Base/Neutral and Acid Compounds By EPA 625 (Screen)</b>				
<b>Dicyclopentadiene</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>&lt; 10</b> Analyzed: 17-Apr-2012 0019 by 301	<b>10</b>	<b>ug/l</b> Batch: B7568	
<b>Maleic anhydride</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>&lt; 10</b> Analyzed: 17-Apr-2012 0019 by 301	<b>10</b>	<b>ug/l</b> Batch: B7568	
<b>Phthalic anhydride</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>&lt; 10</b> Analyzed: 17-Apr-2012 0019 by 301	<b>10</b>	<b>ug/l</b> Batch: B7568	
<b>Surrogate: 2-Fluorobiphenyl (50.0-110%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>80.0</b> Analyzed: 17-Apr-2012 0019 by 301		<b>%</b> Batch: B7568	
<b>Surrogate: 2-Fluorophenol (20.0-110%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>65.2</b> Analyzed: 17-Apr-2012 0019 by 301		<b>%</b> Batch: B7568	
<b>Surrogate: Nitrobenzene-D5 (40.0-110%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>76.5</b> Analyzed: 17-Apr-2012 0019 by 301		<b>%</b> Batch: B7568	
<b>Surrogate: Terphenyl-D14 (50.0-135%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>76.2</b> Analyzed: 17-Apr-2012 0019 by 301		<b>%</b> Batch: B7568	
<b>Surrogate: 2,4,6-Tribromophenol (40.0-125%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>63.5</b> Analyzed: 17-Apr-2012 0019 by 301		<b>%</b> Batch: B7568	
<b>Volatile Organic Compounds By EPA 624</b>				
<b>Styrene</b> EPA 624 Prep: 16-Apr-2012 1047 by 301	<b>&lt; 5.0</b> Analyzed: 16-Apr-2012 1513 by 305	<b>5.0</b>	<b>ug/l</b> Batch: V7983	
<b>Surrogate: 4-Bromofluorobenzene (75.0-120%)</b> EPA 624 Prep: 16-Apr-2012 1047 by 301	<b>101</b> Analyzed: 16-Apr-2012 1513 by 305		<b>%</b> Batch: V7983	
<b>Surrogate: Dibromofluoromethane (85.0-115%)</b> EPA 624 Prep: 16-Apr-2012 1047 by 301	<b>89.8</b> Analyzed: 16-Apr-2012 1513 by 305		<b>%</b> Batch: V7983	
<b>Surrogate: Toluene-D8 (85.0-120%)</b> EPA 624 Prep: 16-Apr-2012 1047 by 301	<b>99.0</b> Analyzed: 16-Apr-2012 1513 by 305		<b>%</b> Batch: V7983	





CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: <u>Ashland Inc.</u>			PO No.		No of BOTTLES	Analyses Requested										AIC Control No: <u>156926</u>	
Project Reference: <u>Semi Annual Waste Water</u>			Sample Matrix			WATER	SOIL	BOD, TSS	OTG	STYRENE	DICYCLOPENTHENE	MALEIC ANHYDRIDE	PARATHION METHYL	ETHYLENE GLYCOL	AIC Proposal No:		
Project Manager: <u>Mike Taylor</u>			G R A B	C O M P											Carrier:		
Sampled By: <u>Mike Taylor</u>					Date/Time Collected	AIC No.	Sample Identification	WATER	SOIL	BOD, TSS	OTG	STYRENE	DICYCLOPENTHENE	MALEIC ANHYDRIDE	PARATHION METHYL	ETHYLENE GLYCOL	Received Temperature °C <u>2 C</u>
																	Remarks
					<u>001</u>			<u>1</u>	<u>X</u>								
					<u>002</u>			<u>1</u>	<u>X</u>								
					<u>003, 004, 005</u>			<u>3</u>		<u>X</u>							
					<u>006, 007, 008</u>			<u>3</u>		<u>X</u>							
					<u>009</u>			<u>1</u>					<u>X</u>				
			Container Type					<u>P</u>	<u>G</u>	<u>G</u>	<u>G</u>	<u>G</u>			Field pH calibration on _____ @ _____		
			Preservative					<u>N</u>	<u>S</u>	<u>N</u>	<u>Z</u>				Buffer:		
			G = Glass NO = none		P = Plastic S = Sulfuric acid pH2		V = VOA vials N = Nitric acid pH2		H = HCl to pH2 B = NaOH to pH12		T = Sodium Thiosulfate Z = Zinc acetate						
Turnaround Time Requested: (Please circle) NORMAL or EXPEDITED IN _____ DAYS					Relinquished By: <u>Mike Taylor</u>		Date/Time: <u>4/12/12</u>		Received By:		Date/Time:						
Expedited results requested by:					Relinquished By:		Date/Time:		Received in Lab By: <u>[Signature]</u>		Date/Time: <u>4-12-12 15:07</u>						
Who should AIC contact with questions: <u>Mike Taylor</u>					Comments: <u>email: Results - wm.taylor@ashland.com</u>												
Phone: <u>501-533-6112</u> Fax: <u>501-533-6101</u>																	
Report Attention to: <u>Mike Taylor</u>																	
Report Address to: <u>Ashland Inc 1901 W Redmond Rd Jacksonville, AR 72076</u>																	

D-3/3

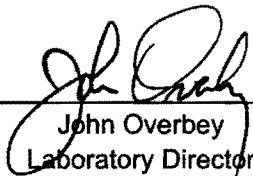


Jacksonville Wastewater Utility  
ATTN: Mr. Sam Zehtaban  
248 Cloverdale Road  
Jacksonville, AR 72076

This report contains the analytical results and supporting information for the sample submitted on April 12, 2012. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Laboratory Director or a qualified designee.

  
John Overbey  
Laboratory Director

This document has been distributed to the following:

PDF cc: Jacksonville Wastewater Utility  
ATTN: Mr. Sam Zehtaban  
sam@jwwu.com

Jacksonville Wastewater Utility  
ATTN: Mr. Kevin McGill  
kevin@jwwu.com



Jacksonville Wastewater Utility  
248 Cloverdale Road  
Jacksonville, AR 72076

**ANALYTICAL RESULTS**

**AIC No.** 156900-1

**Sample Identification:** A15-02,01,03,04 4-12-12 8:45am

<b>Analyte</b>	<b>Result</b>	<b>RL</b>	<b>Units</b>	<b>Qualifier</b>
<b>BOD 5-day</b> SM 5210 B Prep: 13-Apr-2012 0853 by 271	<b>34</b> Analyzed: 18-Apr-2012 0941 by 271	<b>7</b>	<b>mg/l</b> Batch: W39526	<b>D</b> Dil: 6.7
<b>Total Suspended Solids</b> USGS 3765 Prep: 13-Apr-2012 1417 by 302	<b>71</b> Analyzed: 14-Apr-2012 1432 by 302	<b>20</b>	<b>mg/l</b> Batch: W39531	
<b>Ethylene glycol</b> EPA 8015C Prep: 13-Apr-2012 1003 by 288	<b>&lt; 10</b> Analyzed: 17-Apr-2012 0822 by 07	<b>10</b>	<b>mg/l</b> Batch: C15204	
<b>Oil and Grease</b> EPA 1664A Prep: 16-Apr-2012 0815 by 295	<b>7.4</b> Analyzed: 16-Apr-2012 1033 by 295	<b>5</b>	<b>mg/l</b> Batch: B7569	
<b>Base/Neutral and Acid Compounds By EPA 625 (Screen)</b>				
<b>Dicyclopentadiene</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>&lt; 10</b> Analyzed: 16-Apr-2012 2306 by 301	<b>10</b>	<b>ug/l</b> Batch: B7568	
<b>Maleic anhydride</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>&lt; 10</b> Analyzed: 16-Apr-2012 2306 by 301	<b>10</b>	<b>ug/l</b> Batch: B7568	
<b>Phthalic anhydride</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>&lt; 10</b> Analyzed: 16-Apr-2012 2306 by 301	<b>10</b>	<b>ug/l</b> Batch: B7568	
<b>Surrogate: 2-Fluorobiphenyl (50.0-110%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>78.2</b> Analyzed: 16-Apr-2012 2306 by 301		<b>%</b> Batch: B7568	
<b>Surrogate: 2-Fluorophenol (20.0-110%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>69.5</b> Analyzed: 16-Apr-2012 2306 by 301		<b>%</b> Batch: B7568	
<b>Surrogate: Nitrobenzene-D5 (40.0-110%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>78.0</b> Analyzed: 16-Apr-2012 2306 by 301		<b>%</b> Batch: B7568	
<b>Surrogate: Terphenyl-D14 (50.0-135%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>82.8</b> Analyzed: 16-Apr-2012 2306 by 301		<b>%</b> Batch: B7568	
<b>Surrogate: 2,4,6-Tribromophenol (40.0-125%)</b> EPA 625 (Screen) Prep: 13-Apr-2012 1003 by 288	<b>78.8</b> Analyzed: 16-Apr-2012 2306 by 301		<b>%</b> Batch: B7568	
<b>Volatile Organic Compounds By EPA 624</b>				
<b>Styrene</b> EPA 624 Prep: 16-Apr-2012 1047 by 301	<b>&lt; 5.0</b> Analyzed: 16-Apr-2012 1400 by 305	<b>5.0</b>	<b>ug/l</b> Batch: V7983	
<b>Surrogate: 4-Bromofluorobenzene (75.0-120%)</b> EPA 624 Prep: 16-Apr-2012 1047 by 301	<b>101</b> Analyzed: 16-Apr-2012 1400 by 305		<b>%</b> Batch: V7983	
<b>Surrogate: Dibromofluoromethane (85.0-115%)</b> EPA 624 Prep: 16-Apr-2012 1047 by 301	<b>90.6</b> Analyzed: 16-Apr-2012 1400 by 305		<b>%</b> Batch: V7983	
<b>Surrogate: Toluene-D8 (85.0-120%)</b> EPA 624 Prep: 16-Apr-2012 1047 by 301	<b>96.9</b> Analyzed: 16-Apr-2012 1400 by 305		<b>%</b> Batch: V7983	



Jacksonville Wastewater Utility  
**LABORATORY SERVICES DEPARTMENT**  
**CHAIN-OF-CUSTODY RECORD**



Identification & Sample Number: **20-001** Sampler Number: **N/A** Set-up Collection Date & Time: **N/A @ N/A AM/PM** Pg 1 of 1

Sample Technician(s) (Signature): *Jon Boyles / Patrick Ellis / Kevin McGill* Take-off Collection Date & Time: **N/A @ N/A AM/PM**

Type Of Sample: (Specify STP)  
 Plant Influent  Industrial Waste  Receiving Stream  Final Effluent  Other

Wastewater Characterization Of Composite Sample: **(X) N/A**  
 Color **GRAY** Oil **N/A** Flow In Pipe **N/A** Turbidity **N/A**

Sampling Comments:  
**(1) 3 (1) liter bottles for Ethylene Glycol, Dicyclopentadiene, Maleic Anhydride, & Phthalic Anhydride.**  
**(2) Two volatile vials used for Styrene sample. Use limits listed on 2009 Quote form.**

Composite	Sample Type	Grab Sample Collection Date & Time	Preservative	Sample Bottle		Parameters Requested	Designated Laboratory	Relinquished	Received In
				Type & Number				By: (Signature) Date & Time	Laboratory By (Signature)
		4-12-12 @ 8:30A	N/A			pH---S/U	On Site		
1		4-12-12 @ 8:45A	Cool to 4 deg C H2SO4 to pH of	G	A15-02	O & G	AI		
1		4-12-12 @ 8:45A	Cool to 4 deg C	P	A15-01	BOD <sub>5</sub> , TSS	AI		
1		4-12-12 @ 8:45A	Cool to 4 deg C HCl to pH < 2.0	G	A15-03	Styrene	AI		
1		4-12-12 @ 8:45A	2- 500mL bottles Cool to 4 deg C	G	A15-04	Ethylene Glycol Dicyclopentadiene Maleic Anhydride Phthalic Anhydride	AI		

**pH Calibration and Performance Data**

Date & Time	Calib. Method	Buffer Temp.	pH Buffers Before & After Standardization			% Slope	Analysist	Grab pH Date and Time
			B	7.00	10.00			
4-12-12 @ 8:35A	ZPT	21.0°C	B	7.02	10.05	94.0%	Km	4-12-12 @ 8:30 Am
			A	7.00	10.00			Date and Time Performed 4-12-12 @ 8:40 Am

**pH Analysis Record**

Sample Number: **20-002** Relinquished by: *K. McGill*  
 Reported Value (pH s.u.): **9.13** Date & Time: **4-12-12 @ 10:10 Am**  
 Duplicate Values: **1**  
 Date: **4-12-12** Time: **8:40 Am** pH Val. (s.u.): **9.13** Deg. C: **20.2°C** Vlo. Y/N:   
 Received by: *Lupea Nepton* Date & Time: **4-12-12 1010**

*20E-3/3*

Influent		Ave	CBOD(mg/L	CBOD(lbs/day	TSS(mg/L	TSS(lbs/day	NH3-N	NH3-N	Max
Month	Flow	)	)	)	)	(mg)	N(lbs)	Flow	
Jan-12	5	150.5	6275.9	151.5	6317.6	21.3	888.2	8.1	
Feb-12	6.5	94.9	5144.5	136	7372.6	16.6	899.9	14.3	
Mar-12	7.2	101.4	6088.9	128.5	7716.2	16.2	972.8	19.2	
Apr-12	3.4	173.5	4919.8	170.5	4834.7	20.1	570.0	4.7	
May-12	2.5	195	4065.8	216.8	4520.3	25.6	533.8	3.5	
Jun-12	2.4	209.4	4191.4	191.5	3833.1	29.1	582.5	3	
Jul-12	2.8	229	5347.6	254	5931.4	32.1	749.6	4	
Aug-12	2.9	193.8	4687.2	211	5103.2	29.1	703.8	7.4	
Sep-12	3.6	166.3	4993.0	168.5	5059.0	23.8	714.6	8.4	
Oct-12	2.9	194.2	4696.9	194	4692.1	27.2	657.9	6.4	
Nov-12	3.2	205.8	5492.4	188.5	5030.7	26.2	699.2	6.1	
Dec-12	4.9	130.8	5345.3	169	6906.4	16.2	662.0	10.7	
averages	3.9	170.4	5104.0	181.7	5609.8	23.6	719.5		

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NPDES ID(s): AR0041335

Major/Minor Indicator:

Violation Date: 03/01/2010 - 01/01/2013

Violation Type(s):

# Environmental Protection Agency Integrated Compliance Information System Violations Report

Created Date: 09/15/2010

Refresh Date: 01/15/2013

Report Version 1.2, Modified: 01/03/2011

## AR0041335

**Permittee Name:** JACKSONVILLE WASTEWATER UTILITY - J. ALBERT JOHNSON REGIONAL TREATMENT FACILITY  
**Permittee Address:** 248 CLOVERDALE ROAD JACKSONVILLE, AR 72076  
**Major/Minor Indicator:** Major  
**Compliance Track Status:** On  
**DMR Non Receipt Flag:** On  
**RNC Tracking Flag:** On

**Primary SIC Code:** 4952  
**Primary SIC Desc:** Sewerage Systems  
**Primary NAICS Code:** 221320  
**Primary NAICS Desc:** Sewage Treatment Facilities  
**Cognizant Official:** THEA HUGHES/SAM ZEHTABAN  
**Receiving Body:** BU METO, ARKANSAS R

**Permit Issued:** 10/19/2012  
**Permit Effective:** 11/01/2012  
**Permit Expired:** 10/31/2017  
**Permit Status:** Effective

### Facility Information

**Facility Name:** JACKSONVILLE, CITY OF  
**Facility Location:** 248 CLOVERDALE ROAD JACKSONVILLE, AR 72076

**County:** Pulaski  
**Region:** 06  
**State-Region:**

**FRS ID:** 110000730291  
**Federal Facility Ownership:** N  
**Type of Ownership:** Municipal or Water District

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### DMR Non-Receipt Violations

Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D80	12/31/2010	01/25/2011	TX1-S	TGP3B - Pass/Fail Static Renewal 7 Day Chronic Ceriodaphnia	1	0	C2	K	02/25/2011	2 04/25/2011	04/25/2011
D80	12/31/2010	01/25/2011	TX1-S	TGP6C - Pass/Fail Statre 7Day Chronic Pimephales Promelas	1	0	C2	K	02/25/2011	2 04/25/2011	04/25/2011
D80	12/31/2010	01/25/2011	TX1-S	TLP3B - Low Flow Pass/Fail Survival Test Static Renewal 7 Day Chronic Ceriodaphnia dubia	1	0	C2	K	02/25/2011	2 04/25/2011	04/25/2011
D80	12/31/2010	01/25/2011	TX1-S	TLP6C - Low Flow Pass/Fail Survival Test Static Renewal 7 Day Chronic Pimephales promelas	1	0	C2	K	02/25/2011	2 04/25/2011	04/25/2011
D80	12/31/2010	01/25/2011	TX1-S	TOP3B - NOEC Lethal Static Renewal 7 Day Chronic Ceriodaphnia dubia	1	0	C2	K	02/25/2011	2 04/25/2011	04/25/2011
D80	12/31/2010	01/25/2011	TX1-S	TOP6C - NOEC Lethal Static Renewal 7 Day Chronic Pimephales promelas	1	0	C2	K	02/25/2011	2 04/25/2011	04/25/2011
D80	12/31/2010	01/25/2011	TX1-S	TPP3B - NOEC Sub-Lethal Static Renewal 7 Day Chronic Ceriodaphnia dubia	1	0	C2	K	02/25/2011	2 04/25/2011	04/25/2011
D80	12/31/2010	01/25/2011	TX1-S	TPP6C - NOEC Sub-Lethal Static Renewal 7 Day Chronic Pimephales promelas	1	0	C2	K	02/25/2011	2 04/25/2011	04/25/2011

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g. \*\*X\*\*) indicate the NODI code will not automatically resolve RNC.

Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

**Environmental Protection Agency  
Integrated Compliance Information System  
Violations Report**

Created Date: 09/15/2010  
Refresh Date: 01/15/2013  
Report Version 1.2, Modified: 01/03/2011

**AR0041335**

**DMR Non-Receipt Violations**

Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D80	12/31/2010	01/25/2011	TX1-S	TQP3B - Coef Of Var Statre 7Day Chronic Ceriodaphnia	1	0	C2		K 02/25/2011	2 04/25/2011	04/25/2011
D80	12/31/2010	01/25/2011	TX1-S	TQP6C - Coef Of Var Statre 7Day Chronic Pimephales	1	0	C2		K 02/25/2011	2 04/25/2011	04/25/2011

**Schedule Violations**

Violation Code	Sch. Event Code	Schedule Date	Actual Date	Report Received Date	EA Identifier	Sch. Num.	Sch. Type	Schedule Event/ Comments	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
C20	00303	12/30/2012	01/03/2013	01/03/2013		1	P	Adopt Local Limits Comment: Submit written certification/ notification of technical evaluation for (TBLL) within 60 days of the effective date of permit.		

**Single Event Violations**

Violation Code	Single Event Violation Date	Single Event Start Date	Single Event End Date	Agency type	Violation Description/ Comments	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E0011	12/31/2011	12/31/2011	12/31/2011	State	Reporting Violations - Late Submittal of DMRs Comment:		

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g. \*\*X\*\*) indicate the NODI code will not automatically resolve RNC.  
Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

G-2/2

## WHOLE EFFLUENT TOXICITY TESTING SUMMARY

Permit Number: AR0041335      AFIN: 60-00543  
Facility Name: City of Jacksonville      Outfall Number: 001  
Critical Dilution: 100%      Testing Frequency: semi annual  
Date of Review: 1/17/13      Name of Reviewer: M. Barnett

Number of tests performed during previous 3 years by species:

*Pimephales promelas* (Fathead minnow): 7

*Ceriodaphnia dubia* (water flea): 5

Failed test dates during previous 3 years by species:

<i>Pimephales promelas</i> (Fathead minnow):	<u>Lethal</u> None	<u>Sub-lethal</u> 2/2012
----------------------------------------------	-----------------------	-----------------------------

<i>Ceriodaphnia dubia</i> (water flea):	<u>Lethal</u> None	<u>Sub-lethal</u> None
-----------------------------------------	-----------------------	---------------------------

The facility passed the required monthly retests in March and April of 2012.

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APPROVED FINAL

AR 33464

*Belmont*

JACKSONVILLE WASTEWATER UTILITY  
PRETREATMENT REPORT  
SEPTEMBER 1983

L-1/2

CITY OF JACKSONVILLE  
SIGNIFICANT INDUSTRIAL USER LISTING

minor mod. 8/22/91  
~~AE~~

User	SIC
1. Little Rock Air Force Base ✓	4521
2. Rebseman Regional Medical Center ✓	8062
3. Stone Container Corporation ✓	2433
4. Van Waters and Rogers ✓	5161
5. American Military Arms Corporation - Cat. CFR 433 ✓	3484
6. Cold Extrusion Company of America - Cat. CFR 433 ✓	3498
7. Aristech Chemical Corporation ✓	2822
8. Hercules (Vertac Superfund Site) ✓	2879
9. Jacksonville Manufacturing Company ✓	3361
10. National Swage Company ✓	3429

Proposed New User

1. Triangle Engineering see minor Mod in Prod. File 8/16/91  
(It added triangle)
2. Jimelco? see Annual Report Dated 2/1/91

Industrial User	City	SIC 1	SIC 2	NAICS 1	NAICS 2	NAICS 3	Cat 1	Cat 2	Comments	PmtNbr
Kraft Foods, Inc.	Bentonville	2022		311513					Cheese Products	AR0022403
Wal-Mart TMG	Bentonville	4173								AR0022403
3M ESPE	Bentonville	5122	2834				439		Prescription mouthwash and gels	AR0022403
Motor Technologies (Regal Beloit)	Blytheville	3621		335312			433		large electric motors (iron phosphatizing on Al casting)	AR0022560
Motor Appliance	Blytheville	3629		332813			433		Battery Chargers (phosphatizing)	AR0022560
Siemens Ind.	Blytheville	7692		332813			433		industry, Ni & Cr plates	AR0022560
Nibco	Blytheville	3491	3321	332911					Industrial steel valves (sand casts)	AR0022560
Omnium, LLC	Blytheville	2879		325320			455		herbicides/pesticides formulation	AR0022560
Bright Harvest Foods	Clarksville	2038	2053	311813					Produce sweet potato products: fries, casseroles, etc	AR0022187
Hanesbrand	Clarksville	2251							Mfg. of ladies hosiery	AR0022187
Greenville Tube	Clarksville	3356		331210			433		Nitric acid passivation on S.S. tube products	AR0022187
Baldor Motors & Drives	Clarksville	3621	3566	335312					assemble subfractional elect. motors/gear boxes (no CFR 433 core ops)	AR0022187
Gibson Piano Venture Inc.	Conway	3931								AR0033359
SFI of Arkansas #1	Conway	3599							formally ARKO, LLC	AR0033359
Linen King	Conway	7218							Industrial Laundry	AR0033359
Conway Regional Hospital	Conway	8062							Hospital	AR0033359
Southern E-Coating	Conway	3479					433			AR0033359
Wonder State Box Co.	Conway	2653		322211					Corrugated Boxes	AR0033359
Valley Plating	Conway						433		Ni/Cr plating of office furniture	AR0033359
Snap-On	Conway	3549	3559						Automotive Equip.	AR0033359
Central Ark. Dust Control	Conway	7218							Industrial Laundry	AR0033359
IC Corporation	Conway	3713	3711				433		formally AMERICAN, school buses, medium duty trucks	AR0033359
Virco #2	Conway						433			AR0033359
Conway Mills	Conway	2647								AR0033359
Rock-Tenn	Conway	2651		322212						AR0033359
DETCO Ind.	Conway	2842	2899	325612			417		Soaps and Detergents Mfg	AR0033359
International Paper	Conway	2653		322211					Corrugated Boxes w/ Printing	AR0033359

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Tokusen USA	Conway	3315	3496		433	Steel braided wire for tires, Cu, Zn plating, sulphuric & phos acid	AR0033359
SFI of Arkansas #2	Conway	3599			433	Fe phosphating, fluorozirconization sealant prior to powder painting	AR0033359
Arkansas Box Co.	Conway	2653				Box mfg. w/inks, dye	AR0033359
Age Industries	Conway	2653					AR0033359
L.A. Darling Company	Corning	2542		337127	433	Fe phosphatizing store shelves	AR0033979
Pilgram's Pride	DeQueen	2015				Poultry kill and further processing	AR0021733
Conagra)	El Dorado	2015	2077			Rendering	AR0049743
El Dorado Paper Bag Co.	El Dorado	2674		322220		Mfg. Food grade paper bags	AR0049743
Amercable, Assoc. Materials	El Dorado	3469				Mfg. Rubber coated multi-wire cable (lead sheathe utilized for vulcan)	AR0049743
Milbank Mfg.	El Dorado	3613	3643	335313	433	Mfg. Electric Meter Boxes (Fe phosphatizing)	AR0049743
Prescolite Reflector Plant (Hubble Lighting)	El Dorado	3471			433	Mfg. Lighting reflectors (acid clean/anodize)	AR0049743
Miller Transporters Inc.	El Dorado	4231		811192 488490	442	Interior truck wash facility ("PMP on file")	AR0049743
Ayrshire Electronics	Fayetteville	3672				Electronics	AR0020010
Elkhart Prod. Corp.	Fayetteville	3498	3432		468	Copper tubing, "T's", elbows, etc.	AR0020010
Hiland Dairy Corp.	Fayetteville	2026	2086			Bottled mil	AR0020010
Marshalltown Tools	Fayetteville	3423			433	Concrete const. hand tools	AR0020010
Superior Indust. International	Fayetteville	3714	3471		433	Wheels (Aluminum cast, plating, polishing, machining, etc)	AR0020010
Tyson Foods (South)	Fayetteville	2038	2099			Frozen dinners	AR0020010
Pinnacle Foods Corp.	Fayetteville	2038				Frozen dinners	AR0020010
Custom Powder	Fayetteville	3479			433	Powder Coatings	AR0020010
Airtherm, a Division of Mestek	Forrest City	3585			433	Fe phoshatizing for powder coating (w/water curtain)	AR0020087
Fort Smith Plating Inc	Ft. Smith	3471			413	job shop electroplator	AR0021750
(Exide Corp)	Ft. Smith	3691			461	Battery Manufacturer	AR0021750
Hickory Springs Mfg	Ft. Smith	3469	3429		433	Metal frames/parts painting for couch, steps & foam production	AR0021750
Hiram Walker	Ft. Smith	2085	5182			Custom blender of distilled spirits	AR0021750

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Colson Casters Corp.	Jonesboro	3429		433	acids	AR0043401
Riceland Foods	Jonesboro	2044			Rice processing	AR0043401
Delta Cons. Industries (Division of Danaher Corp)	Jonesboro	3469	3069	433	Tool boxes - Aluminum, steel & plastic	AR0043401
Hytrol Conveyor	Jonesboro	3535		433	Mfg. conveyor systems	AR0043401
Alberto Culver	Jonesboro				Perfumes/Cosmetics	AR0043401
Nice-Pak Products	Jonesboro				Perfumes/Cosmetics	AR0043401
Farr Company	Jonesboro	3564	3499	433	Air filtration systems	AR0043401
Butterball LLC	Jonesboro	2013			the Conagra facility)	AR0043401
Kraft Foods (Post Services)	Jonesboro	2043			Cereal production	AR0043401
Thomas & Betts	Jonesboro	3648		433	Tanning Beds	AR0043401
Thomas & Betts	Jonesboro	3644		433	plating, Cr. Conversion	AR0043401
G & K Services	Jonesboro	7218			Industrial laundry	AR0043401
Frito-Lay, Inc.	Jonesboro	2096			Potato chips & snacks	AR0043401
Trinity Lighting	Jonesboro	3646		433	Hotel lighting fixtures	AR0043401
Mountain Pure Holding, LLC	Little Rock	5149			Bottler of water and fruit juices	AR0021806
Porocel Corp.	Little Rock	2819			Mineral Milling	AR0021806
Sage V Foods	Little Rock	2038	2044		Rice cooking	AR0021806
Tire Curing Bladders	Little Rock	3011		428	no reg'd ww discharged	AR0021806
Martinous Oriental Rug	Little Rock				Oriental rugs (non-SIU)	AR0021806
Ryerson	Little Rock				Metal fabrication (non-SIU)	AR0021806
Phelps Fan	Little Rock				Fan mfg (non-SIU)	AR0021806
Specialties	Little Rock	3429		433	discharged)	AR0021806
Hospital	Little Rock	8062			Hospital	AR0021806
Unilever	Little Rock	2099			peanut butter production	AR0021806
BFI Landfill	Little Rock	4953			Landfill leachate (non-SIU)	AR0021806
CertainTeed	Little Rock	2952		443	Rolled asphalt roofing material	AR0021806
Little Rock City Landfill	Little Rock	4953			landfill (non-SIU)	AR0021806
Coca-Cola Bottling	Little Rock	2086			soft drink bottler	AR0021806
Turner Coleman Dairy	Little Rock	2024	2026		Dairy products	AR0021806
Dassault Falcon Jet Corp	Little Rock	3728		433	FINISH & refurbish corporate jets (no reg'd ww discharged)	AR0021806
Good Old Days Foods	Little Rock	2051			Frozen fruit cobbles (non-SIU)	AR0021806

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Griffin Industries	Little Rock	2077	4214		Pork Hide Drying (non-SIU)	AR0021806
Inc.	Little Rock	3714		433	CFR 433 w.w.)	AR0021806
I-30 Tank Wash & Scales	Little Rock	7699	7542		(Non-SIU)	AR0021806
Interstate Highway Sign Company	Little Rock	3993	7399	433	plating/anodizing on Al, silkscreening)	AR0021806
Jack Wilson WTP	Little Rock	4941			Water treatment plant	AR0021806
Recycling/Disposal	Little Rock	2952			Landfill Leachate (non-SIU)	AR0021806
Ameripride Linen & Apparel	Little Rock	7218			Industrial Laundry	AR0021806
Arkansas Childrens Hospital Services	Little Rock	8062			Hospital	AR0021806
Little Rock Central Laundry	Little Rock	7218			Hospital	AR0021806
McClellan VA Hospital	Little Rock	8062			Industrial Laundry	AR0021806
Central Flying Service	Little Rock	4581		433	Hospital	AR0021806
Darling International Sausage	Little Rock	2077			no discharge of reg'd ww	AR0021806
Cameron Valves	Little Rock	2013			grease recycling	AR0021806
Ozark Point WTP	Little Rock	3544		433	Sausage links, patties, etc	AR0021806
Progress Rail Service (Raytheon)	Little Rock	4941			no discharges of CFR 433 w.w	AR0021806
Southwest Hospital	Little Rock	3471	3562	433	Water treatment plant	AR0021806
St. Vincent Hospital	Little Rock	3721		433	discharge)	AR0021806
St. Vincent/Doctor's Hospital	Little Rock	8062			discharge)	AR0021806
Two Pine Landfill Sciences	Little Rock	8062			Hospital (non-SIU)	AR0021806
West-Pak	Little Rock	2653			Hospital	AR0021806
Dusty Mop & Mat	Little Rock	7218			Hospital	AR0021806
Lithographic	Little Rock				Landfill leachate (non-SIU)	AR0021806
Arkansas Electric Coop.	Little Rock				Hospital and research facility	AR0021806
Clark Machinery	Little Rock				Corrugated Boxes (non-SIU)	AR0021806
Little Rock City Landfill	Little Rock	4953			Industrial Laundry	AR0021806
PPG	Little Rock	2851		466	Printing (non-SIU)	AR0021806
Welspun Tubular	Little Rock	3317		433	Elect. Equip repair (non-SIU)	AR0021806
George Fisher Sloane	Little Rock	3084			Heavy Equip (non-SIU)	AR0021806
					Landfill leachate	AR0021806
					discharged)	AR0021806
					Spiral pipe & coating	AR0021806
					Plastic Molding	AR0021806

Arkansas Heart Hospital	Little Rock	8062					Hospital	AR0021806
Jan-Eze Plating, Inc.	Nashville	3471				433	nickel-chrome (hard) plating on small pistons and cylinders	AR0021776
Caterpillar Inc	North Little Rock			333120		433	Mfg of motor graders (under const. w/no reg'd w.w. discharge as yet)	AR0020303
North	Rock	8062		622110			Hospital	AR0020303
Blue Beacon	Rock	7542		811192			Truck Wash	AR0020303
Central Ark. Veterans Healthcare	North Little Rock	8062		622110			Veterans Hospital	AR0020303
J. B. Hunt Transport	Rock	4231		484121	811192		Truck Maintenance	AR0020303
Koppers Industries	North Little Rock	2491	2421	321114		429	Pressurized wood treatment (R.R. ties)	AR0020303
L'Oreal USA Products Inc.	Rock	2844		325620			Cosmetics	AR0020303
Maverick	North Little Rock	7542	4213	484121	811192		Truck Wash, maintenance	AR0020303
Truck-O-Mat	Rock	7542	5541	811192			Truck Wash, gas station	AR0020303
Tyson Foods	Rock	2015		311615			Poultry Processing	AR0020303
Union Pacific - Pike	North Little Rock	4011		482111			RR engines, etc. maintenance and repair & switchyard	AR0020303
Arkansas Surgical Hospital	Rock	8062		622110			Surgical hospital	AR0020303
Bruce Oakley	Rock	4213	7542	484220	811192		Truck wash	AR0020303
St. Vincent North	Rock	8062		622110			Hospital	AR0020303
Nidec (Emerson)	Paragould	3621				464	casting)	AR0033766
Garlock Rubber Technologies	Paragould	32622	339991	326291	31332		conveyor belts, bearing pads	AR0033766
Martin Sprocket & Gear, Inc.	Paragould	2899	3089			433	Mfg of sprockets from powdered metals, blackening (0 discharge)	AR0033766
MMI Trutech.	Paragould	332811		332811			Finisher under CFR 433	AR0033766
Prestolite Wire Corp.	Paragould	3357	3471			433	mfg of rubber/plastic-coated Cu wire for auto ind (0 discharge)	AR0033766
Tenneco Automotive Center	Paragould	3714				433	Auto shock absorbers and struts (Fe & Zn phos & Cr plating)	AR0033766
L.A. Darling	Paragould			337215		433	Hospital	AR0033766
AR Methodist Med Center	Paragould			622110			Fluorozirconic acid prep for powder paint coating	AR0033766
Center-Hospital	Pine Bluff	8062					Hospital	AR0033316
Planters CottonOil	Pine Bluff	2074					Cotton Seed Processor	AR0033316
Union Pacific	Pine Bluff	4013					Cleaning of rail car tankers	AR0033316
Stant, Inc.	Pine Bluff	3714				433	Mfg gas caps	AR0033316

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Arcelor (Trefil ARBED)	Pine Bluff	3315			433		Mfg wire for steel belted tires (Cu & Zn plating, HCl acid);	AR0033316
Aramark Services, Inc.	Pine Bluff	7218					Industrial Laundry	AR0033316
Central Moloney, Inc. A & B	Pine Bluff	3677	3612		433		Power Transformers	AR0033316
Tyson-Industrial Park	Pine Bluff	2015					kill & further processing of poultry	AR0033316
Wheeling Machine	Pine Bluff	3498	3494		433		Pipe couplings (Ni & Tin plating)	AR0033316
GPR	Pine Bluff	4953					Landfill Leachate	AR0033316
Kennametal (Rogers Tool Works)	Rogers	3545		333515	471		tungsten carbide sintering snapes for machine tool accessories	AR0043397
Ozark Mountain Poultry	Rogers	2015		311615			Poultry processing	AR0043397
Bekaert Corp.	Rogers	2296		314992	433	420	plating)	AR0043397
Glad Manufacturing	Rogers	2673		326111			Plastic bags	AR0043397
MAFCO	Rogers	3443		332919	433		machining	AR0043397
Model Laundry & Dry Cleaners	Rogers	7218		812320			Industrial laundry and dry cleaning	AR0043397
Pei-Freeze, Inc.	Rogers	2015		311615			Poultry frozen products	AR0043397
Premium Line Products Co.	Rogers	3644		335932	467		Aluminum forming, wire (utility pole hardware, rubber splice cases)	AR0043397
Superior Industries, Inc.	Rogers	3363		331521	433		Aluminum cast automotive wheels (No Cr plating anymore)	AR0043397
Southeast Poultry	Rogers	311615	2015	311615			Chicken de-boning	AR0043397
Tyson Chick-N-Quick	Rogers	2015		311615				AR0043397
Tyson's of Rogers	Rogers	2015		311615			Poultry processing	AR0043397
Cryovac, Inc. (Non-SIU)	Rogers	2673		326111			NS non-CIU	AR0043397
Grace Mfg	Russellville	3423			433		Acid etching of S.Steel small cutting tools, rasps, bone cutters	AR0021768
16th	Russellville	2653	2671				Corrugated cardboard boxes	AR0021768
Con Agra Foods	Russellville	2038					Frozen food (chicken)	AR0021768
MAHLE/Dana Cor	Russellville	3714					mfg diesel motor components (caustics)	AR0021768
Firestone	Russellville	3011					rubber inner tubes and mixing	AR0021768
International Paper	Russellville	2653					Corrugated boxes	AR0021768
Hackney-Ladish Company	Russellville	3462	3494				Pipe fittings	AR0021768
POM, Inc.	Russellville	3999			433		mfg. parking meters, Zn & Al die cast, phosphatizing	AR0021768
Premium Protein Products	Russellville	2077						AR0021768
Service	Russellville	2024					Frozen yogurt	AR0021768
Taber Extrusions	Russellville	3354			467		Al extruded specialty products (2nd largest press in the U.S.)	AR0021768

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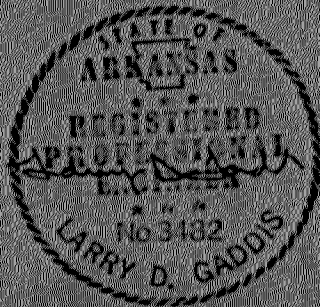
Hatchery	Russellville	0254			Chicken hatchery	AR0021768
Tyson Foods (Tyson Plant Road Complex)	Russellville	2017			Processed chicken parts & breeding	AR0021768
Land O' Frost, Inc.	Searcy	2013			Lunch meat processing	AR0021601
Road Systems, Inc.	Searcy	3715	3711		Truck trailers and tractors	AR0021601
The Bryce Co. LLC	Searcy	3089	2641		Flexible packaging mtrtl	AR0021601
White Co. Med Ctr SOUTH	Searcy	8062			Hospital	AR0021601
Cintas, Inc.	Searcy	7218			Industrial laundry	AR0021601
Eaton Hydraulics, Inc.	Searcy	3492	3494	433	Hydraulic valves & filters	AR0021601
White Co. Medical Center	Searcy	8062			Hospital	AR0021601
Yarnell Ice Cream Co., Inc.	Searcy	2024			Ice cream	AR0021601
Walmart Dist. Center 18	Searcy	4224			Distribution	AR0021601
BJ Services	Searcy				Oil and Gas Well Service	AR0021601
Schulze & Birch Kaiser (Printing & Finishing Group)	Sheridan	3432		433	Food Production (Pastries) Kitchen & bakery (cakes & plating)	AR0021601 AR0034347
Cobb Vantress	Siloam Springs	2015			Egg (chicken) hatchery	AR0020273
(Closed)	Siloam Springs	3621		433	Plant Closed	AR0020273
Gates Rubber	Siloam Springs	3052		428	Rubber power transmission belts, various applications (no PSES)	AR0020273
Simmons Industries	Siloam Springs	2015			Poultry kill/further processing plant	AR0020273
Apex Tool Group	Springdale	3423		433	Mfg. hand tools, Ni/Chrome (tri) plating & currently on CAO	AR0022063
Kawneer Co.	Springdale	3354	3446	467	Mfg. aluminum window and wall frames	AR0022063
Northwest Metal Finishing	Springdale	3471		433	Custom electroplating (no process w.w. discharged)	AR0022063
Cintas Corp.	Springdale	7218			Industrial Laundry	AR0022063
Superior Linen	Springdale	7218			Industrial Laundry	AR0022063
Cargill Inc.	Springdale	2015		432	Turkey further processing	AR0022063
Georges Inc	Springdale	2015			Chicken processor	AR0022063
Georges Further Processing	Springdale	2015			Chicken further processing	AR0022063
Pappas Foods	Springdale	2037	2033		Juice Processor and bottler	AR0022063
Triple T Foods	Springdale	2047			Chicken processed for pet food	AR0022063
Tyson's Research & Tech	Springdale	2015			Poultry Research	AR0022063
Tyson's - Berry St.	Springdale	2015			Chicken processing	AR0022063

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Tyson's - Randall Rd.	Springdale	2015				Chicken processor	AR0022063
American Tubing	Springdale	3499	3498		433	process w.w.	AR0022063
PM Industries	Springdale	3471			433	Zn, Cr) (no process w.w. discharged	AR0022063
Arkansas	Springdale	2017				Egg processing	AR0022063
Contemporary Products, Inc.	Springdale	2834			439	Pharmaceutical Mfg (no discharge)	AR0022063
Center)	Springdale	2015			432	Poultry research	AR0022063
JB Hunt Transport	Springdale (Lowell)	4213	4210			External truck wash & maintenance facility	AR0022063
Riceland	Stuttgart	2044	2099			products	AR0034380
Producers	Stuttgart	2044				Rice milling	AR0034380
Tate & Lyle (formerly Staley)	Van Buren	2046				Modified food starch	AR0021482
Arkansas Lamp Mfg.	Van Buren	3645	1721		433	Lamps (phosphatizing and powder coat paint)	AR0021482
Fab Tech, Inc.	Van Buren	3499	1721		433	Sheet metal fab. & electronic enclosures (phosphatizing & p.c.	AR0021482
River City Coatings	Van Buren	3479	1721		433	metal parts (phosphatizing & powder paint coatings)	AR0021482
Simmons Poultry, Inc.	Van Buren	2017				Poultry processing	AR0021482
Tyson Foods, Inc.	Van Buren	2017				Poultry processing	AR0021482
of America	Van Buren	7542				Exterior truck wash	AR0021482
B & W Plating	Van Buren					Electroplating/Anodizing/Coloring	AR0021482
Simmons Foods, Inc.	Simmons-Siloam Spgs for	2015				Chicken further processing w/marinades	AR0021482
Industrial Metal Finishing Inc. #1	Walnut Ridge	3471	332813		433	Zn plating, Zn phosphatizing & Black Oxidizing	AR0046566
Industrial Metal Finishing Inc. #2	Walnut Ridge	3471	332813		433	Zn plating on ferrous metals for various customer parts	AR0046566
Automated Conveyors	West Memphis	3535	333922		433	power driven & gravity conveyor systems (phosphatizing)	AR0022039
Coca-Cola Bottling (NS-SIU)	West Memphis	2086	312111			(permitted non-SIU)	AR0022039
Grace Trailer	West Memphis	7542	811192		442	exterior)	AR0022039
Langston Bag (NS-SIU)	West Memphis	2674	322224			(permitted NON-SIU)	AR0022039
Nu-Way Products (NS-SIU)	West Memphis	2899	325612			pool chemicals/supplies, NaOH, bleach, perc. (permitted NON-SIU)	AR0022039
ATM Oil (NS-SIU)	West Memphis	32411				New NS-SIU	AR0022039
PSC Container (Qualia)	West Memphis				442	Truck Wash	AR0022039
LLC	West Memphis					Chain Link Fences	AR0022039

# PRELIMINARY ENGINEERING REPORT

Sewerage Improvements  
Jacksonville Wastewater Utility  
Jacksonville, Arkansas



January, 1997

**CRIST ENGINEERS, INC.**  
**CONSULTING ENGINEERS**

1405 N. Pierce, Suite 301  
Little Rock, Arkansas 72207  
Telephone 501-664-1557  
Fax 501-664-8579

K-1/2

## Pollutant Loading Rates

Average monthly Johnson Plant influent BOD<sub>5</sub>, TSS, and NH<sub>3</sub>-N loading rates for the five-year period of 1991-1995 are shown in Figures 4-2, 4-3, and 4-4, respectively. These average monthly rates were themselves averaged to estimate average annual plant loading rates. These average annual rates thus derived were then used, along with annual maximum monthly loading rates, to estimate average annual loading rates, concentrations, and peaking factors for evaluation and design purposes as given in Appendix B. The resulting pollutant concentrations and peaking factors selected are given in Table 4-7.

<b>Influent Constituent</b>	<b>Average Day, mg/L</b>	<b>Maximum Month Peaking Factor</b>
<b>BOD<sub>5</sub></b>	<b>140</b>	<b>1.25</b>
<b>TSS</b>	<b>170</b>	<b>1.35</b>
<b>NH<sub>3</sub>-N</b>	<b>11</b>	<b>1.30</b>

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**CALCULATIONS OF ARKANSAS WATER QUALITY-BASED EFFLUENT LIMITATIONS**

For an Arkansas River/Stream

(Reserved)

AV

AR River

**STEP 1:** INPUT TWO LETTER CODE FOR ECOREGION (Use Code at Right)  
Basin Name

[REDACTED]

Permittee  
NPDES Permit No.  
Outfall No.(s)  
Plant Ave Flow (MGD)  
SIUs Ave Flow (MGD)  
Domestic Flow (MGD)  
Plant Design Flow (MGD)  
Plant Design Flow (cfs)

Jacksonville  
AR0041335  
001  
5.00  
0.10  
4.90  
12.31  
19.02

**Codes & TSS for**

Ouachita Mts. Eco (OM) =  
Ozark Highlands Eco (OH) =  
Boston Mts. Eco (BM) =  
Ark River Valley Eco (AV) =  
  
Gulf Coastal Eco (GC) =  
Delta Ecoregion (DL) =

L-7/2

[REDACTED]

Is this a large river? (see list at right)(enter "1" if yes, "0" if no; make entry as a number)

0

Name of Receiving Stream:

Bayo Meto  
3B

Waterbody Segment Code No.

Is this a lake or reservoir? (enter '1' if yes, '0' = no; make entry as a number)

0

Is seasonal critical flow applicable (1=yes, 0=no); see Reg 2 page 1-3 for details.

0

(Reserved) DO NOT INPUT DATA INTO CELL H25, H26 & H27....LEAVE BLANK=?

?

(Reserved)

?

(Reserved)

(Reserved)

?

(Reserved)

(Reserved)

(Reserved)

(Reserved)

(Reserved)

(Reserved)

Ecoregion TSS (mg/l) (For Large River, See List to Right)

3.00

Site Specific Hardness (mg/l)

26.48

Enter 7Q10 (cfs)

(Reserved)

0.00

(Reserved)

Long Term Ave / Harmonic Mean Flow (cfs)

0.00

(Reserved) (Reserved)

Using Diffusers (Yes/No)

No

pH (Avg)

6.95

Percent (%) of 7Q10 for Chronic Criteria

0.67

Percent (%) of 7Q10 for Acute Criteria

0.33

Water Effect Ration (WER)

1.00

**Total Hardness**  
Arkansas River =  
Ouachita River =  
White River = 1'  
  
Gulf Coastal = 3  
Ozark Highlands  
Boston Mount =

**Large Rivers**  
Mississippi River  
White (Below co  
Ouachita (Below  
  
For industrial ar  
for the past 24 m  
  
#VALUE! => N

Pollutant	% Rem <sup>7</sup>	Water Quality mg/l	Water Quality <sup>1</sup> lbs/day	Sludge mg/kg	Sludge <sup>3</sup> lbs/day	Inhibition <sup>2</sup> mg/l	Inhibition <sup>4</sup> lbs/day	MAHL lbs/day	MAHC mg/l	Domestic Allocation for %SF <sup>5</sup> lbs/day	MAIL <sup>6</sup> lbs/day	Max Inf Exceeded MAHC	Max Effluent vs WQS(mg/l)
Cadmium Total	67	0.0019	0.2428	85	0.41	1.00	41.70	0.2428	0.00582	0.07	0.18	No	No
Copper Total	86	0.0097	2.8893	4300	16.00	1.00	41.70	2.8893	0.06929	2.00	2.17	No	0.0100
Lead Total	61	0.0029	0.3090	840	4.41	1.00	41.70	0.3090	0.00741	1.77	0.23	No	No
Mercury Total	60	0.00001	0.0014	57	0.30	0.10	4.17	0.0014	0.00003	0.0082	0.0010	No	No
Nickel Total	42	0.1018	7.3177	420	3.20	1.00	41.70	3.20	0.07674	0.08	2.40	No	No
Selenium Total	50	0.0056	0.4654	100	0.640	0.20	8.34	0.465	0.01116	0.20	0.35	No	No
Silver Total	75	0.0010	0.1718	0	0.00	0.25	10.43	0.1718	0.00412	0.21	0.13	No	No
Zinc Total	49	0.0898	7.3414	7500	48.98	0.300	12.51	7.3414	0.17605	4.56	5.51	No	No
Chromium Total	82	0.3096	71.7317	3000	11.71	1.00	41.70	11.71	0.28075	0.12	8.78	No	No
Cyanide Total	69	0.0058	0.7806	0	0.00	0.10	4.17	0.7806	0.01872	0.41	0.59	No	No
Arsenic	45	0.3490	26.4579	75	0.53	0.10	4.170	0.533	0.01279	0.02	0.40	No	No
Molybdenum	50	0.0000	0.0000	75	0.480	0.20	8.34	0.480	0.01151	0.01	0.36	No	No
Beryllium	50	0.005915	0.4933	0	0.00	0.10	4.17	0.4933	0.01183	0.02	0.37	No	No

Dry tons/day of sludge<sup>8</sup>  Safety Factor

<sup>1</sup> lbs/day = mg/l \* 8.34 \* average flow / (1-%Rem)

<sup>2</sup> Page 3-44 of EPA 833B87202 Be est @ 0.10 mg/l

<sup>3</sup> lbs/day = (dry tons/day \* 0.002 \* critria(mg/kg)) / % Rem

<sup>4</sup> lbs/day = mg/l \* Flow \* 8.34

<sup>5</sup> lbs/day = (1 - SF) \* MAHL

<sup>6</sup> MAIL = Maximum allowable industrial loading = MAHL \* (1 - SF) - Domestic Loading = Allocation for % SF - Domestic Loading

<sup>7</sup> Rem Eff from Page 3-56 EPA 833B87202, Be & Mo est @ 50, Copper and Zinc from "Rem" spreadsheet in this Workbook

<sup>8</sup> Dry tons/day of sludge based on 2007 Sludge report showing 531 dry tons/year or 531 X (2205/2000) / 365 = 1.60 dt/day

L-2/2  
7

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: JANUARY 1, 2012 TO DECEMBER 31, 2012**  
**TREATMENT PLANT: City of JACKSONVILLE, AR NPDES PERMIT #AR0041335**  
**AVERAGE POTW FLOW: 4.34 MGD % IU FLOW: 18 %**

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)
		2/7/12	5/15/12	9/11/12	11/9/12		2/7/12	5/15/12	9/11/12	11/6/12			
Antimony	N/A	N/A	N/A	<60.0	N/A	N/A	N/A	<60.0	N/A	60	200.8	60.	
Cadmium	5.58	<0.5	0.68	<0.5	<0.5	1.84	<0.5	<0.5	<0.5	0.5	200.8	0.5	
Copper	35.53*	19.0	45.0	44.0	58.0	9.24	5.2	8.6	7.1	7.5	0.5	200.8	0.5
Lead	6.95	1.7	2.2	2.6	3.2	2.71	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Mercury	0.03	0.026	0.082	0.17	0.26	0.01	<0.005	<0.005	<0.005	<0.005	0.005	245.7	0.005
Nickel	76.74	3.8	4.8	5.2	4.7	96.96	2.9	3.2	3.1	3.2	0.5	200.8	0.5
Selenium	11.16	N/A	N/A	<5.0	<5.0	5.58	N/A	N/A	<5.0	<5.0	5	200.8	5.0
Silver	3.73	<0.5	0.67	<0.5	<0.5	0.93	<0.5	0.68	<0.5	<0.5	0.5	200.8	0.5
Zinc	167.71	57.0	140.0	120.0	140.0	85.53	27.0	45.0	25.0	58.0	20	200.8	20
Chromium	280.75	<10.0	<10.0	<10.0	<10.0	295.43	<10.0	<10.0	<10.0	<10.0	10	200.8	10
Cyanide	18.72	N/A	N/A	<10.0	<10.0	5.8	N/A	N/A	<10.0	<10.0	10	SM4500- CN C,E	10
Arsenic	12.79	<0.5	<0.5	1.7	1.3	348.96	<0.5	<0.5	1.1	0.66	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	44.0	88.0	26.0	110.0	N/A	21.0	19.0	24.0	5.1	5	420.1	5
Beryllium	11.83	N/A	N/A	<0.5	<0.5	5.91	N/A	N/A	<0.5	<0.5	0.5	200.8	0.5
Thallium	N/A	N/A	N/A	<0.5	<0.5	N/A	N/A	N/A	<0.5	<0.5	0.5	200.8	0.5
Flow, MGD	N/A	6.415	3.157	2.543	2.414	N/A	7.247	3.997	2.50	2.68			
(3) Bis(2ethylhexyl) phthalate		N/A	N/A	34.0	N/A		N/A	N/A	34.0	N/A		625	50.0

M-1/A

\* In reference to ADEQ Letter (see email dated 2-17-12), the Department increased the removal efficiency to 86% and the MAHC increased to 65.98 µg/l for Copper.