

ADEQ

ARKANSAS
Department of Environmental Quality

January 11, 2008

Mr. Hugh W. Harrison, III
General Manager
Clarksville Light and Water Company
P.O. Box 1807
Clarksville, AR 72830

Re: AFIN: 36-00038; NPDES Permit No. AR0022187

Dear Mr. Harrison:

On December 13, 2007, I performed a pretreatment compliance inspection of your facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act and the regulations promulgated there under. This inspection revealed that you are in compliance with the terms of your permit.

If I can be of any assistance, please contact me at 870-446-6170.

Sincerely,



Bruce Kirkpatrick
District 2 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R 0 0 2 2 1 8 7 11 12 0 7 1 2 1 3 17 18 p 19 S 20 1					
Remarks					
A F I N 3 6 - 0 0 0 3 8					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N	72 N	73 74 75	80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Clarksville Light and Water Pollution Control Facility Located on South Crawford Highway one mile South of Interstate 40 Exit 57 in Sections 7 & 8, Township 9 North, Range 23 West, in Johnson County, Arkansas	Entry Time/Date 0722 / December 13, 2007	Permit Effective Date January 1, 2004
	Exit Time/Date 1430 / December 13, 2007	Permit Expiration Date December 31, 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Gregg Rainey / Pollution Control Facility Superintendent / Phone: 479-754-7929 / Fax: 479-754-6885	Other Facility Data Outfall 001 sample point located at Latitude N 35-26-38.8 Longitude W 93-29-05.4 Outfall 002 sample point located at Latitude N 35-26-44.3 Longitude W 93-28-24.8	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Hugh W. Harrison, III, General Manager Clarksville Light and Water Co. P.O. Box 1807 Clarksville, AR 72830 / Phone 479-754-6241	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

The inspection revealed that the facility was operating the pretreatment program satisfactorily. The records were well maintained and organized. During the course of the inspection, four Industrial User (IU) Inspections were performed. The facilities visited were Greenville Tube, Hanes Brand, Bright Harvest and Baldor Electric. The IU Inspection Reports are included in this report. After the closing of Stapleton Industries, the facility has only four Significant IUs. The facility has developed a good working relationship with its IUs. In 2007, the facility demonstrated the effectiveness of its Enforcement Program by using a Consent Administrative Order as a tool with which to bring Hanes Brand, a significant violator, back into compliance.

Name(s) and Signature(s) of Inspector(s) 	Bruce Kirkpatrick	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jasper PHONE# (870) 446-6170 /FAX# (870) 446-2181	Date December 17, 2007
Signature of Reviewer	Agency/Office/Phone and Fax Numbers		Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Clarksville

AFIN Number: 36-00038

NPDES Permit Number(s): AR0022187

Program Tracked under NPDES Permit Number: AR0022187

Fact Sheet Preparation Date: Not known

Date of Last PCI/Audit: June 12-14, 2007

Date of Last Annual Report: February 2007

Name of Inspector: Bruce Kirkpatrick

Date PCI Performed: December 13, 2007

Name, Title, and Telephone Number of Facility Representative:
Mr. Gregg Rainey / Pollution Control Facility Superintendent / Phone: 479-754-7929 / Fax: 479-754-6885

Name and Title of Other Participants: Ms. Pam Crow
Pretreatment Coordinator

Number of IUs Visited: 4

Name(s) of IUs Visited: _____
Greenville Tube, Hanes Brand, Bright Harvest and Baldor Electric.

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. none

2. Has ADEQ or EPA been notified of these changes? na
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** yes
4. What procedures are being used to update the IU Survey?
New water accounts/company water usage/questionnaires

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 4
6. Number of Categorical Industrial Users: 2
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Apply categorical standards based on the IU's industrial activity

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Greenville Tube	Metal finishing	nitric acid rinse
Baldor Electric	Metal finishing	phosphatizing

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? yes

2. Describe any apparent problems with the local limits.
None noted

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>quarterly</u>	<u>quarterly</u>	<u>quarterly</u>	
Effluent:	<u>quarterly</u>	<u>quarterly</u>	<u>quarterly</u>	
Sludge:	<u>quarterly</u>	<u>quarterly</u>	<u>quarterly</u>	
Organics:				
Influent:	<u>annually</u>	<u>annually</u>	<u>annually</u>	
Effluent:	<u>annually</u>	<u>annually</u>	<u>annually</u>	
Sludge:	<u>annually</u>	<u>annually</u>	<u>annually</u>	

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
Hanes Brands changed suppliers and yarn suppliers. New raw material contained a mineral oil which passed through to the POTW. This IU was brought back into compliance using a Consent Administrative Order. Action was effective.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? yes
2. How many IU permits (or other control documents) have been issued? 5
3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.
yes
-
4. Does the control document contain the following items?
- An expiration date: yes
- Discharge limitations: yes
- If the program requires self-monitoring by the IUs, do the Permits contain:
- IU self-monitoring requirements: yes
- IU reporting requirements: yes
5. Indicate which of the following recommended standard conditions are contained in the control documents:
- Sample location: Yes
- Type of sample: Yes
- Monitoring frequency: yes
- Bypass prohibition: yes
- Right of entry: yes
- Nontransferability: yes
- Revocation clause: yes
- Penalty Provisions: yes
- Slug load notification: yes
- Notification of process change: yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>quarterly</u>	<u>annually</u>
other SIUs	<u>quarterly</u>	<u>annually</u>
Inspection:		
categorical IUs	<u>annually</u>	<u>annually</u>
other SIUs	<u>annually</u>	<u>annually</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? yes

3. Are inspections announced or unannounced? unannounced

4. Are records kept of each inspection? yes

5. Does the inspection report contain an adequate description of the following:
 - Date and time of inspection: yes
 - Officials present: yes
 - Inspection of chemical storage areas: yes
 - Description of regulated processes, categorical waste streams, and discharge location of these waste streams: yes
 - Inspection of the pretreatment facilities: yes
 - Review of self-monitoring records: yes
 - Observation of IU self-monitoring procedures: yes
 - Verification that approved analytical techniques are used: yes
 - Verification of IU flow measurement (where required): yes

6. Overall adequacy of inspection documentation: Meets requirements

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).
yes
-
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? yes
-
9. Are sampling and flow monitoring equipment properly maintained? yes
-
10. Is the POTW keeping proper field notes and chain of custody forms? yes
-
11. Is the sampling location representative of the discharge to the collection system? yes
-
12. Are sampling locations identified in POTW records? yes
-
13. Are sampling services available in an emergency? yes
-
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? The pretreatment coordinator receives reports and reviews them for errors and non-compliance. Computer is used for tracking.
-
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? yes
-
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? yes
-

17. What are the POTW's procedures for following up violations?
Facility sends letter to IU listing the violation(s). The IU is required to submit information regarding the corrective action(s). Correspondence until corrected.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?: yes

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address: yes

Other environmental permits held: yes

Description of operations: yes

Process flow diagrams: yes

Flow measurements: yes

Measurements of regulated pollutants: yes

Certification of compliance by the IU: yes

Compliance schedule (if needed): na

19. Additional comments on the POTW's inspection and sampling procedures: none

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, in city ordinance

2. How does the POTW respond to the following violations?

Effluent limitations: Follows Enforcement Response Plan
Fines up to \$10,000/day.

Late reports: Follows Enforcement Response Plan

Unpermitted discharges: Follows Enforcement Response Plan

Slug loads or spills: Follows Enforcement Response Plan

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes - Hanes Brand was publicly noticed in 2007.

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
Hanes Brand	Oil & Grease	CAO	No required construction
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:
In 2007, the facility demonstrated the effectiveness of its Enforcement Program by using a Consent Administrative Order as a tool with which to bring Hanes Brand, a significant violator, back into compliance.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? yes

2. Are staffing levels adequate? yes

3. Are the responsible officials familiar with the approved program? yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: na

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? na

3. Does the POTW have copies of permits for IUs in other cities? na

4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? na

5. Comments on multijurisdictional issues: none

H. EVALUATION AND COMMENTS

Facility appears to be operating an effective pretreatment program. All four IUs were visited. There appeared to be very good cooperation between the facility and its IU contacts.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Hanes BrandPOTW Name: Clarksville Light & WaterIndustry Contacts: Mr. Eddy ShirleyDate and Time of Visit: 0742 on December 13, 2007Description of Manufacturing Process: manufactures hosiery from
yarn raw materialsSources of Process Wastewater: wash waterCategorical Industry? noBasis for Limits: Back-calculated from design capability of
Aero-Mod on-site pretreatment unit operated by POTW under
Point of Application: Heat recovery pitDescription of Pretreatment Equipment and Procedures:
Heat recovery (cooling)Spill Prevention and Solvent Management Procedures:
Facility has a "Comprehensive Spill Control & Countermeasure /
Emergency Response Plan". This detailed document describes all
potential sources, pollution prevention and spill response
procedures.Sampling Location and Equipment:
Oil & Grease is grab sampled at the effluent from the Aero-Mod
plant which the POTW operates. No Oil & Grease treatment
takes place in the Aero-Mod plant.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Bright Harvest Sweet Potato Company

POTW Name: Clarksville Light & Water

Industry Contacts: Mr. Jeff Hannon

Date and Time of Visit: 0855 / December 13, 2007

Description of Manufacturing Process: sweet potato canning

Sources of Process Wastewater: blanching sweet potatoes

Categorical Industry? no

Basis for Limits: City Ordinance

Point of Application: At outfall from aerated pond

Description of Pretreatment Equipment and Procedures:
Screening to primary clarifier to secondary clarifier to aerated pond

Spill Prevention and Solvent Management Procedures:
Facility has a current detailed spill prevention plan.

Sampling Location and Equipment:
Grab samples are taken from outfall of aeration pond.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Baldor ElectricPOTW Name: Clarksville Light & WaterIndustry Contacts: Mr. Fritz FreemanDate and Time of Visit: 0943 / December 13, 2007

Description of Manufacturing Process:

Manufacturer of electric motors, gear boxes

Sources of Process Wastewater:

PhosphatizingCategorical Industry? yesBasis for Limits: City Ordinance & Federal Pretreatment Stds.Point of Application: At batch pH adjustment tank

Description of Pretreatment Equipment and Procedures:

pH adjustment

Spill Prevention and Solvent Management Procedures:

Facility has current, detailed plan for spill prevention and
Solvent management. Solvents and coolants are stored with
Secondary containment prior to pick-up by Rhineco.

Sampling Location and Equipment:

In the 139 gallon pH adjustment tank prior to batch discharge to
POTW

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Greenville Tube CorporationPOTW Name: Clarksville Light & WaterIndustry Contacts: Ms. Cathy RocolleDate and Time of Visit: 1039 / December 13, 2007Description of Manufacturing Process:
Steel tube drawing to specifications

Sources of Process Wastewater:

Fresh water rinse tank after dipping tubing in nitric acidCategorical Industry? YesBasis for Limits: City ordinance and Federal pretreatment stds.Point of Application: At discharge from rinse tank

Description of Pretreatment Equipment and Procedures:

pH is adjusted in rinse tank prior to discharge to POTW

Spill Prevention and Solvent Management Procedures:

Facility follows a detailed Spill Prevention / Toxic Organic Management Plan dated September 2006.

Sampling Location and Equipment:

Grab samples are taken at the discharge point from the rinse tank.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

INSPECTOR'S NAME:	<u>Bruce Kirkpatrick</u>	CODE
NAME OF FACILITY:	<u>Clarksville Light & Water</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022187</u>	NPID
DATE OF PCI:	<u>December 13, 2007</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>4</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>2</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN