

ADEQ

ARKANSAS
Department of Environmental Quality

December 16, 2008

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

NPDES Permit No.: AR0022187

AFIN: 36-00038

Dear Mr. Harrison:

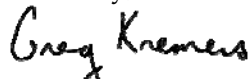
On December 4 & 5, 2008, Amy Beck and I performed a routine pretreatment compliance inspection of your facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violation:

It was found that the POTW is not sampling the two categorical facilities (Baldor Electric and Greenville Tube) for the presence of cyanide as required by 40 CFR 403.8.f.2.v. Each Significant Industrial User must be sampled for all required monitoring parameters at least once per year.

The above item requires your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department. This response should contain documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by January 9, 2009.

If I can be any assistance, please contact me at 479-968-7339.

Sincerely,



Greg Kremers
District 5 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

WATER DIVISION



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

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

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 8 1 2 0 4 17 18 P 19 S 20 1					
Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 0 0 2 69	70 2	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 & Water Pollution Control Facility South Crawford, one mile south of I-40, Exit 57 Sec. 7 & 8, T9N, R23W Johnson County	Entry Time/Date 0930 / 12-4-2008	Permit Effective Date January 4, 2004
	Exit Time/Date 1510 / 12-5-2008	Permit Expiration Date December 31, 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Gregg Rainey / Pollution Control Facility Superintendent / 479-754-7929 Pam Smith / PT Coordinator and Lab Supervisor / 479-754-7929	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Hugh Harrison, General Manager Clarksville Light & Water Company P.O. Box 1807 Clarksville, AR 72830 479-754-8181	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

N	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	M	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)

It was found during the pretreatment inspection that the POTW is not sampling for cyanide, at least once per year, at the two categorical facilities under jurisdiction of the city as required by 40 CFR 403. Both industries fall under 40 CFR 433.

SIUs visited:

Baldor Electric, categorical – No problems noted.

Bright Harvest Sweet Potato Company – An unpermitted discharge was discovered as having occurred prior to our visit. The discharge occurred as a result of a clogged pipe leading to the primary clarifier. Process water discharged from a drain at the back lot of the facility and spread out on the ground. Discharge was not reported. SIU was instructed to at least notify POTW as required in the event such occurrence happens again.

Name(s) and Signature(s) of Inspector(s) Greg Kremers <i>Greg Kremers</i>	Agency/Office/Telephone/Fax Arkansas Department of Environmental Quality / Russellville / 479-968-7339 / 479-968-7321	Date December 16, 2008
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Clarksville Light & Water Pollution Control Facility

AFIN Number: 36-00038

NPDES Permit Number(s): AR0022187

Program Tracked under NPDES Permit Number: AR0022187

Fact Sheet Preparation Date: Not evaluated

Date of Last PCI/Audit: December 13, 2007

Date of Last Annual Report: January 28, 2008

Name of Inspector: Greg Kremers

Date PCI Performed: December 5, 2008

Name, Title, and Telephone Number of Facility Representative:
Pam Smith, Pre-Treatment Coordinator, 479-754-7929

Name and Title of Other Participants: Gregg Rainey

Number of IUs Visited: 2

Name(s) of IUs Visited: Bright Harvest Sweet Potato Company
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? N/A

3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes

4. What procedures are being used to update the IU Survey?
Water usage, phonebook scan, Haz-waste generator list, 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? 40 CFR 403

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	TCE rinse
Baldor Electric	Metal finishing	Phosphatizing

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? N/A Local limits are not needed due to no excursions of water quality. (Gilliam, 8-28-2008)

2. Describe any apparent problems with the local limits.
N/A

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 Permit:	Requirement in Program:	Comments:
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?
No upsets have occurred.

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? 4

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: Satisfactory

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-
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).
No. Cyanide sampling has not been conducted at categorical facilities (Baldor & Greenville Tube)
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? PT Coordinator receives reports and analysis, reviews them and then enters in computer.
-
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?
Write letter of violations to IU. IU must submit corrective action.

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): Yes

19. Additional comments on the POTW's inspection and sampling procedures: Cyanide sampling at the two categorical facilities will need to be conducted.

E. Enforcement

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

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

Effluent limitations: Letter requiring corrective action

Late reports: Letter

Unpermitted discharges: Notifies ADEQ

Slug loads or spills: Letter. IU responsible for reimbursement of money.

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

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:
Hanesbrand	Oil and grease	Consent order	Constructin req. (2-20-09)
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:

None

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes. Update of program is scheduled. Update of language for 40 CFR 403.**

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: **None**

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **N/A**

3. Does the POTW have copies of permits for IUs in other cities? **N/A**

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? **N/A**

5. Comments on multijurisdictional issues: **N/A**

H. EVALUATION AND COMMENTS

POTW needs to begin implementing the proper sampling protocol as required by 40 CFR 403. All parameters must be sampled at each SIU.

POTW should probably review with the SIU the reporting requirements in the event of any permit violations, such as an unpermitted discharge or overflow.

The pretreatment program was given a marginal rating on this inspection due to the fact that the proper sampling protocol is not being followed. However, the staff is very knowledgeable with the program and it's SIUs. No other problems were observed in the reviewed areas.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Bright Harvest Sweet Potato Company

POTW Name: Clarksville Light & Water Pollution Control Facility

Industry Contacts: Jeff Hannon

Date and Time of Visit: December 5, 2008 @ 1235

Description of Manufacturing Process:
Canning of sweet potatoes

Sources of Process Wastewater:
Cleaning, boiling and processing of sweet potatoes

Categorical Industry? No

Basis for Limits: Limits are found in POTW issued permit

Point of Application: Outfall below final pond

Description of Pretreatment Equipment and Procedures:
Primary clarifier, secondary clarifier, aerated pond

Spill Prevention and Solvent Management Procedures:
SPCC plan in place at facility

Sampling Location and Equipment:
Automated sampler located in a sampling shed on the outskirts of the property below treatment ponds.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Baldor Electric

POTW Name: Clarksville Light & Water Pollution Control Facility

Industry Contacts: Fritz Freeman

Date and Time of Visit: December 5, 2008 @ 1340 hours

Description of Manufacturing Process:
Manufacturing of electric motors

Sources of Process Wastewater:
Rinse water of metal components prior to powder coating

Categorical Industry? Yes

Basis for Limits: POTW issued permit and Federal pretreatment standards

Point of Application: 139 gallon rinse tank

Description of Pretreatment Equipment and Procedures:
Addition of soda ash for pH adjustment

Spill Prevention and Solvent Management Procedures:
SPCC plan in place.

Sampling Location and Equipment:
139 gallon rinse tank. Tank discharges in batches. Grab samples are collected prior to each discharge and composited.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Greg Kremers</u>	
NAME OF FACILITY:	<u>Clarksville Light & Water Pollution Control Facility</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022187</u>	NPID
DATE OF PCI:	<u>December 5, 2008</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>1</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

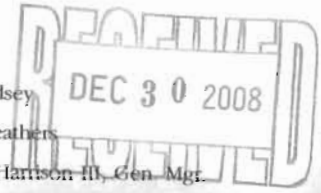


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COMMISSIONERS

Christel Thompson
Steven Sosebee
Matt Wylie

Eddie Lindsey
Darrell Weathers
Hugh W. Harrison III, Gen. Mgr.



P.O. Box 1807 • Phone (479) 754-3148 • Clarksville, Arkansas 72830

December 26, 2008

ADEQ
Water Division, Enforcement Branch
5301 Northshore Drive
N. Little Rock, AR 72218-5317

RE: Permit # AR-0022187
AFN 36-00038

This letter is in response to the compliance inspection at our P.O.T.W. on December 4th & 5th, 2008.

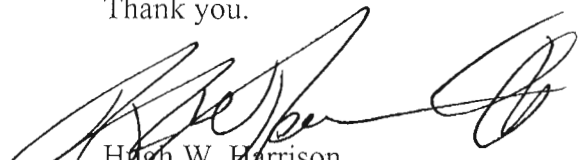
The inspection revealed that we have not sampled our two catagorical industries, (Baldor & Greenville Tube), for cyanide annually.

This procedural error has been corrected and was an oversight on our part.

We have sent a sample off for 2008, on December 19th and expect the results back shortly. While we have received non-detects from the semi annual samples the SIU's have performed, we recognize that does not mitigate our responsibilities, we regret the oversight.

If you need additional information, please advise.

Thank you.



Hugh W. Harrison
General Manger

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RECEIVED

ADEQ

ARKANSAS
Department of Environmental Quality

January 5, 2009

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

RE: Wastewater Treatment Facility and POTW, NPDES Permit No.: AR0022187,
AFIN: 36-00038, Response to Inspection

Dear Mr. Harrison:

The Department has received your response to the December 4th and 5th, 2008 routine compliance inspections of your facilities by our District Field Inspector, Greg Kremers. Your letter appears to adequately address the discrepancies identified during the visit. The Department assumes the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your company and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0632 or you may e-mail me at robertsa@adeq.state.ar.us. In any written correspondence to this Department, please refer to NPDES Permit AR0022187 and AFIN 36-00038.

Sincerely,



Anne Roberts
Enforcement Administrator
Water Division Enforcement Section