

ADEQ

ARKANSAS
Department of Environmental Quality

April 18, 2011

Mike Hughes, General Manager
Clarksville Light & Water Company
PO Box 1807
Clarksville, AR 72830

AFIN: 36-00038


NPDES Permit No.: AR0022187

Dear Mr. Hughes

On March 17, 2011, ADEQ Inspector 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 that you are in compliance with the terms of your permit.

If I can be of any assistance, please contact me at harmont@adeq.state.ar.us or at 479-968-7339 extension 14.

Sincerely,



Travis Harmon
District 5 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> 4 <input type="text" value="2"/> <input type="text" value="2"/> 5 <input type="text" value="1"/> <input type="text" value="8"/> <input type="text" value="7"/> 11 <input type="text" value="1"/> <input type="text" value="1"/> 12 <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="1"/> <input type="text" value="7"/> 17			18 <input type="text" value="P"/>	19 <input type="text" value="S"/>	20 <input type="text" value="1"/>
Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69	70 <input type="text" value="N"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text"/> <input type="text"/> <input type="text"/>	74 75 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 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 Company 1305 S Crawford, Clarksville, AR 72830	Entry Time/Date 3/17/11/ 0930	Permit Effective Date 4/1/09
	Exit Time/Date 3/17/11/ 1430	Permit Expiration Date 3/31/14
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Gregg Rainey/ Superintendent/ 479-754-7929 Pam Smith/ Lab Supervisor & Pretreatment/ 479-754-7229	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mike Hughes/ General Manager PO Box 1807, Clarksville, AR 72830	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)

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

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

No violations found.

Name(s) and Signature(s) of Inspector(s) Travis Harmon <i>Travis Harmon</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Russellville (479) 968-7339 / (479) 968-7321	Date 3/29/11
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 Company

AFIN Number: 36-00038

NPDES Permit Number(s): AR0022187

Program Tracked under NPDES Permit Number: AR0022187

Fact Sheet Preparation Date: NE

Date of Last PCI/Audit: 11/8/2010 to 11/10/2010

Date of Last Annual Report: 2/8/2011

Name of Inspector: Travis Harmon & Amy Beck

Date PCI Performed: 3/17/2011

Name, Title, and Telephone Number of Facility Representative:

Gregg Rainey, Superintendent, 479-754-7929

Pam Smith, Pretreatment Coordinator, 479-754-6885

Name and Title of Other Participants: NA

Number of IUs Visited: 2

Name(s) of IUs Visited: Greenfield Tube & Hanesbrand

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. NA

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?
City Inspector, Site Visits, Clarksville Light & water Company (CLWC) provides waters and is aware of new customers as well as usages.

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) 3

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:
Greenfield Tube	Metal Finishing	TCE Rinse

Note: * Previous Categorical IU Baldor Electric is now a no discharge facility.

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? NA (Local limits are not needed due to no excursions of water quality, Gilliam 8/28/08)

2. Describe any apparent problems with the local limits.
NA

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>	<u>None</u>
Effluent:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Quarterly</u>	<u>None</u>
Sludge:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Quarterly</u>	<u>None</u>
Organics:				
Influent:	<u>Annually</u>	<u>Annually</u>	<u>Annually</u>	<u>None</u>
Effluent:	<u>Annually</u>	<u>Annually</u>	<u>Annually</u>	<u>None</u>
Sludge:	<u>Annually</u>	<u>Annually</u>	<u>Annually</u>	<u>None</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.

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? 3

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). **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? **Monthly review of reports received.**
-
-
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?
Re-sample within 30 days. Corrective plan.

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: Satisfactory

E. Enforcement

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

Yes. City ordinance is currently being updated.

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

Effluent limitations: Letter & corrective action

Late reports: Letter

Unpermitted discharges: Notifies ADEQ

Slug loads or spills: Letter & Facility must reimburse CLWC

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)? NA (Newspaper when > 60% for a single parameter)

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:
NA			

5. Comments on the POTW's enforcement procedures:
Satisfactory

Hanesbrand permit expires 8/31/11.

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: **NA**

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Hanesbrand

POTW Name: Clarksville Light & Water Company

Industry Contacts: Ed Shirley

Date and Time of Visit: 3/17/11 at 12:00

Description of Manufacturing Process:
Manufacturing of panty hose (weaving, washing, dying).

Sources of Process Wastewater:
Wash water and dye water.

Categorical Industry? No

Basis for Limits: BOD, TSS, pH, Temp

Point of Application: Treatment plant on-site discharges to Clarksville light & Water Company.

Description of Pretreatment Equipment and Procedures:
Treatment plant on-site discharges to Clarksville light & Water Company.

Spill Prevention and Solvent Management Procedures:
Spill materials on-site. Treatment plant on-site discharges to Clarksville light & Water Company.

Sampling Location and Equipment:
Sampling at dye house and at the treatment plant outfall.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Greenfield Tube

POTW Name: Clarksville Light & Water Company

Industry Contacts: Slade Laneer

Date and Time of Visit: 3/17/11 at 13:15.

Description of Manufacturing Process:
Stainless steel tubing.

Sources of Process Wastewater:
Acid wash.

Categorical Industry? Yes

Basis for Limits: Metals (Cd, Cr, Cu, Pb, Ni, Ag, Zn), O&G, pH, Cyanide.

Point of Application: pH adjustment at acid wash rinse tank.

Description of Pretreatment Equipment and Procedures:
pH adjustment at acid wash rinse tank.

Spill Prevention and Solvent Management Procedures:
Spill plan on-site.

Sampling Location and Equipment:
Sampling at acid wash rinse tank.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Travis Harmon</u>	
NAME OF FACILITY:	<u>Clarksville Light & Water Company</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0022187</u>	NPID
DATE OF PCI:	<u>3/17/2011</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>3</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