

ADEQ

ARKANSAS
Department of Environmental Quality

June 19, 2012

Ronald L. Bowen, Manager
Jonesboro City Water & Light
P.O. Box 1289
Jonesboro, AR 72403-1289

RE: Jonesboro City Water & Light - Pretreatment Compliance Inspection

AFIN: 16-00152 NPDES Permit No.: AR0037907

Dear Mr. Bowen:

On May 30 and 31, 2012, I performed a routine pretreatment compliance inspection of the Jonesboro City Water and Light pretreatment program in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. At the time of the inspection, it appeared that you were in compliance with the terms and conditions of your permit. It also appeared that you are meeting all the conditions of your No Exposure Exclusion for stormwater at the east plant (ARR000154).

Additionally, I wish to compliment you on the knowledge and professionalism of your staff. The positive attitude and dedication to "doing the right thing" they expressed is greatly appreciated and should not go unnoticed.

If I can be of any assistance, please contact me at walker@adeq.state.ar.us or 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker
District 3 Field Inspector
Water Division

cc: Water Division Enforcement Branch
 Water Division Permits Branch



Form Approved
OMB No. 2040-0003

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

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"/> <input type="text" value="3"/> <input type="text" value="7"/> <input type="text" value="9"/> <input type="text" value="0"/> <input type="text" value="7"/> 11 <input type="text" value="1"/> 12 <input type="text" value="2"/> <input type="text" value="0"/> <input type="text" value="5"/> <input type="text" value="3"/> <input type="text" value="0"/> 17 18 <input type="text" value="P"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/>	Remarks					
<input type="text" value="A"/> <input type="text" value="F"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="1"/> <input type="text" value="6"/> <input type="text" value="-"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="1"/> <input type="text" value="5"/> <input type="text" value="2"/>						
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"/>	74 <input type="text"/> 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 (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Jonesboro City Water & Light - Pretreatment 1605 Willet Rd. Jonesboro, AR Craighead Co.	Entry Time/Date 1010 5/30/2012 1030 5/31/2012	Permit Effective Date 7/1/2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Myra Taylor/Laboratory Supervisor - Susan Merideth/Treatment Superintendent Jody Gibson/Pretreat. Specialist - Kevin Lawrence/Int. Auditor Adam Saulsbury/Lab and Pretreatment Coordinator	Exit Time/Date 1730 5/30/2012 1340 5/31/2012	Permit Expiration Date 6/30/2016
Name, Address of Responsible Official/Title/Phone and Fax Number Ronald L. Bowen/Manager/870-930-3300 Jonesboro City Water & Light P.O. Box 1289 Jonesboro, AR 72403-1289	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Other Facility Data PDS #066315

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
S	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)

Very good pretreatment program.

Knowledgeable and professional staff.

See attached report for details.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L Walker</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date June 4, 2012
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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

Name of Municipality: Jonesboro City Water and Light

AFIN Number: 16-00152

NPDES Permit Number(s): AR0037907, AR0043401

Program Tracked under NPDES Permit Number: AR0037907

Fact Sheet Preparation Date: 5/18/2012 (Frito-Lay)

Date of Last PCI/Audit: Last PCI 4/13/2006

Date of Last Annual Report: December 19, 2011

Name of Inspector: Brent L. Walker

Date PCI Performed: May 30th and 31st, 2012

Name, Title, and Telephone Number of Facility Representative:
Myra Taylor/Laboratory Supervisor
Susan Merideth/Treatment Superintendent

Name and Title of Other Participants:
Jody Gibson/Pretreat. Specialist - Kevin Lawrence/Int. Auditor
Adam Saulsbury/Lab and Pretreatment Coordinator

Number of IUs Visited: 3

Name(s) of IUs Visited: Riceland, Unilever, Frito-Lay

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?
Review new connections to the two treatment systems, review of Jonesboro Chamber of Commerce Directory, city engineer, local newspaper, & State manufacturer directory

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) 16
6. Number of Categorical Industrial Users: 7
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Limits are determined according to 40 CFR using SIC code and process type in IU survey

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:
Colson Caster	Metal finishing	Zinc electroplating
Delta Cons. Ind.	Metal finishing	Phosphatizing line
Hytrol Conveyor	Metal finishing	Phosphatizing, powder paint
Farr Company	Metal finishing	Phosphatizing line
Thomas and Betts	Metal finishing	Zinc electroplating
Trinity Lighting	Metal finishing	Phosphatizing & painting (wet & powder)
JK Products & Svc. (Formerly Sun Ergoline)	Metal finishing	Phosphatizing line

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes - Developed & adopted technically based local limits in May 1990. Made a change for Cu & Zn mass local limits to concentration by resolution in December 1993. Investigating the need for new local limits for both plants.

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

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>1/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	<u>None</u>
Effluent:	<u>1/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	<u>None</u>
Sludge:	<u>1/quarter</u>	<u>1/quarter</u>	<u>N/A</u>	<u>None</u>
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>N/A</u>	<u>None</u>
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>N/A</u>	<u>None</u>
Sludge:	<u>N/A</u>	<u>N/A</u>	<u>N/A</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?
None

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes-permit

2. How many IU permits (or other control documents) have been issued? 16 permits (plus 39 carwashes)

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: (Only 1 IU requires self-monitoring)

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>1/month - 2/year</u> (IU Specific)	<u>2/year</u>
other SIUs	<u>Daily - 2/year</u>	<u>2/year</u>
Inspection:	(IU Specific)	
categorical IUs	<u>1/year</u>	<u>1/year</u>
other SIUs	<u>1/year</u>	<u>1/year</u>

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

3. Are inspections announced or unannounced? ~1 day notice

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following: **(Reviewed most recent Unilever inspection)**

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 (N/A for Unilever)

Review of self-monitoring records: N/A

Observation of IU self-monitoring procedures: N/A

Verification that approved analytical techniques are used: N/A

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Adequate
CWL is planning to update and improve the inspection process in the near future.

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? AS400 Computer Program used to track reports. Reports go to the pretreatment specialist or the pretreatment coordinator for review and determination of completeness.
-
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes
Only one IU required to do self-monitoring reporting.
-
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? N/A - No recent violations.
-

17. What are the POTW's procedures for following up violations?
If a violation is found in a report, CWL will contact the IU by phone and a letter requiring a response. Further action depends on the specific violation(s).

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?
CWL does not use BMRs. Instead, the information normally contained in BMRs is obtained using questionnaires and the pretreatment permit application.

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: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures: Satisfactory
Staff were very familiar with the IUs visited and appear to have a very good working relationship with the permitted facilities.

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes - No recent significant violators

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

Effluent limitations: Phone call followed by NOV requiring a response

Late reports: Phone call followed by NOV requiring a response

Unpermitted discharges: Phone call followed by NOV requiring a response

Slug loads or spills: Phone call followed by NOV requiring a response

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)? No recent significant violators

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:
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:
Appears adequate - no recent significant noncompliance.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes**
Minor revision since last PCI.
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: **None**

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Riceland

POTW Name: Jonesboro - City Water and Light West

Industry Contacts: William West - Operator

Date and Time of Visit: 5/30/2012 1445-1510

Description of Manufacturing Process:
Parboil plant; milling, packaging and shipping of parboiled and non-parboiled rice

Sources of Process Wastewater:
Parboiling rice; wastewater from cleanup

Categorical Industry? No

Basis for Limits: Local sewer use ordinance

Point of Application: Prior to discharge to POTW

Description of Pretreatment Equipment and Procedures:
Clarifiers, trickling filter, sludge digestion

Spill Prevention and Solvent Management Procedures:
Written spill plan requiring notification of CWL

Sampling Location and Equipment:
West of pretreatment equipment - Autosampler and flow meter

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Frito-Lay

POTW Name: Jonesboro - City Water and Light East

Industry Contacts: Brent Smith - Facility./WHSE Business Unit
Leader/870-910-3420

Date and Time of Visit: 5/30/2012 1550 - 1620

Description of Manufacturing Process:
Potato and corn chip manufacturing

Sources of Process Wastewater:
Production and cleanup from potato and corn chip manufacturing

Categorical Industry? No

Basis for Limits: Local sewer use ordinance

Point of Application: Prior to discharge to POTW

Description of Pretreatment Equipment and Procedures:
Rotary screen, oil & grease separator, starch recovery,
CMAS aeration, pH adjustment, DAF

Spill Prevention and Solvent Management Procedures:
Written spill plan requiring notification of CWL
All areas drain to pretreatment

Sampling Location and Equipment:
Southeast external corner of pretreatment building
Autosampler and flow meter

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Unilever

POTW Name: Jonesboro - City Water and Light East

Industry Contacts: Fran Haslag/Safety, Health & Env. Manager/
870-910-1107

Date and Time of Visit: 5/30/2012 1620 - 1710

Description of Manufacturing Process:
Personal Care Products - Perfumes, Cosmetics, Shampoo,
Conditioner, etc.

Sources of Process Wastewater:
Rinse water from bulk and mixing containers
RO wastewater stream

Categorical Industry? No

Basis for Limits: Local sewer use ordinance

Point of Application: Prior to discharge to POTW

Description of Pretreatment Equipment and Procedures:
Based on material - 1st and possibly 2nd rinses go out as "heavy"
waste; rinses thereafter go to POTW

Spill Prevention and Solvent Management Procedures:
Only floor drains are located in designated wash (cleaning) area
Compounding area drains/valves are computer password protected
and require visual inspection prior to operating

Sampling Location and Equipment:
Outside ~167' from east wall of building
Autosampler and flow meter

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

INSPECTOR'S NAME:	<u>Brent L. Walker</u>	CODE
NAME OF FACILITY:	<u>Jonesboro - City Water and Light</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0037907</u>	NPID
DATE OF PCI:	<u>May 30th and 31st, 2012</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>16</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>7</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



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67						70						N		N																											

Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> Jonesboro City Water & Light - East Treatment Plant 5205 Ingels Rd. Jonesboro, AR Craighead Co.		Entry Time/Date 1305 5/31/2012		Permit Effective Date 3/1/2012	
		Exit Time/Date 1320 5/31/2012		Permit Expiration Date 2/28/2017	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Myra Taylor/Laboratory Supervisor - Jody Gibson/Pretreatment Specialist Adam Saulsbury/Lab and Pretreatment Coordinator				Other Facility Data PDS #066318	
Name, Address of Responsible Official/Title/Phone and Fax Number Ronald L. Bowen/Manager/870-930-3300 Jonesboro City Water & Light P.O. Box 1289 Jonesboro, AR 72403-1289				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	S	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)

As part of a PCI of Jonesboro CWL on May 30th and 31st, this reconnaissance inspection of the East Treatment Plant headworks was conducted to verify that contributing industries were not causing a visible impact on the POTW.

No problems were noted and the headworks appeared to be properly operated and maintained.

See the full PCI report for additional information regarding the pretreatment program and IUs.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>		Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)		Date June 4, 2012
Signature of Reviewer		Agency/Office/Phone and Fax Numbers		Date



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Remarks																												
A F I N 1 6 - 0 0 9 3 6																												
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67						70						N		N		74 75										80		

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Jonesboro City Water & Light - East Treatment Plant 5205 Ingels Rd. Jonesboro, AR Craighead Co.		Entry Time/Date 1305 5/31/2012		Permit Effective Date 9/17/2010	
		Exit Time/Date 1320 5/31/2012		Permit Expiration Date 6/30/2014	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Myra Taylor/Laboratory Supervisor - Jody Gibson/Pretreatment Specialist Adam Saulsbury/Lab and Pretreatment Coordinator				Other Facility Data PDs #066319	
Name, Address of Responsible Official/Title/Phone and Fax Number Ronald L. Bowen/Manager/870-930-3300 Jonesboro City Water & Light P.O. Box 1289 Jonesboro, AR 72403-1289				Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

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

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

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

This no-exposure verification was conducted as part of a routine Pretreatment Compliance Inspection.

This inspection revealed that the facility continues to meet all the conditions of the No Exposure Certification. This is reported in the PCI letter.

No areas of concern were noted.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>		Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)		Date June 4, 2012
Signature of Reviewer		Agency/Office/Phone and Fax Numbers		Date

No Exposure Exclusion Verification

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?
Answering "Yes" to any of these questions indicates the facility is not eligible for the No Exposure Exclusion.

a. Using, storing, or cleaning industrial machinery or equipment, and areas where residuals from using, storing, or cleaning industrial machinery or equipment remain and are exposed to storm water.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
---	--

Comments:

b. Are materials or residuals on the ground or in storm water inlets from spills/leaks.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
---	--

Comments:

c. Are materials or products from past industrial activity exposed.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
---	--

Comments:

d. Is material handling equipment exposed (except adequately maintained vehicles).	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
--	--

Comments:

e. Are materials or products during loading/unloading or transporting activities exposed.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
---	--

Comments:

f. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants).	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
--	--

Comments:

g. Materials contained in open, deteriorated, or leaking storage drums, barrels, tanks, and similar containers.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
---	--

Comments:

h. Materials or products handled/stored on roads or railways owned or maintained by the discharger.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
---	--

Comments:

i. Waste materials exposed (except waste in covered, non-leaking containers [e.g., dumpsters]).	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
---	--

Comments:

j. Application or disposal of process wastewater (unless otherwise permitted).	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
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Comments:

k. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
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Comments:

General Comments: **No areas of concern were identified.**



Form Approved
OMB No. 2040-0003

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

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	3	7	9	0	7	11	12	1	2	0	5	3	0	17	18	I	19	S	20	2	
Remarks																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----													
67						70	N	71	N	72	N	73		74	75														80

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Riceland Foods IU of AR0037907 (Tracking and Receiving) N. Floyd St. Jonesboro, AR Craighead Co.	Entry Time/Date 1445 5/30/2012	Permit Effective Date 7/1/2011
	Exit Time/Date 1510 5/30/2012	Permit Expiration Date 6/30/2016
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) William West/Operator/870-974-3169	Other Facility Data PDS #066321	
Name, Address of Responsible Official/Title/Phone and Fax Number Jeff Johnson/Parboil Operations Manager/870-933-1125 Riceland Foods 216 N. Gee St. Jonesboro, AR 72401	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)

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

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

This facility was inspected during a pretreatment inspection of City Water and Light - Jonesboro, AR and has an active permit issued by the POTW.

Details are attached and also available in the full PCI report.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date June 4, 2012
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

Industrial User Site Visit

Name of Industry: Riceland Foods

Industry Contacts: William West – Operator

Type of Industry: Food Processing – Parboil Plant

Date of Visit: May 30, 2012

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

Additional Comments:

Weirs and baffles in clarifiers are rusted through in many areas and in need of replacement.

Visit Conducted by: Brent L. Walker *Brent L Walker* Date: 6/4/2012



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Washington, D.C. 20460

NPDES Compliance Inspection Report

Section A: National Data System Coding

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1	N	2	5	3	A	R	0	0	3	7	9	0	7	11	12	1	2	0	5	3	0	17	18	I	19	S	20	2	
Remarks																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----													
67						70	N	71	N	72	N	73		74	75														80

Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> Frito-Lay IU of AR0037907 (Tracking) 2810 Quality Way AR0043401 receives discharge Jonesboro, AR Craighead Co.	Entry Time/Date 1550 5/30/2012	Permit Effective Date 7/1/2011
	Exit Time/Date 1620 5/30/2012	Permit Expiration Date 6/30/2016
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Brent Smith – Facility./WHSE Business Unit Leader/870-910-3420	Other Facility Data PDS #066320	
Name, Address of Responsible Official/Title/Phone and Fax Number Brent Smith – Facility./WHSE Business Unit Leader/870-910-3420 Frito-Lay 2810 Quality Way Jonesboro, AR 72401	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)

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

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

This facility was inspected during a pretreatment inspection of City Water and Light - Jonesboro, AR and has an active permit issued by the POTW.

Details are attached and also available in the full PCI report.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date June 4, 2012
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

Industrial User Site Visit

Name of Industry: Frito-Lay

Industry Contacts: Brent Smith – Facility./WHSE Business Unit Leader/870-910-3420

Type of Industry: Food Processing – Potato and Corn Chips

Date of Visit: May 30, 2012

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

Additional Comments:
Appeared satisfactory at the time of inspection.

Visit Conducted by: Brent L. Walker *Brent L Walker* **Date:** 6/4/2012



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OMB No. 2040-0003

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

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	3	7	9	0	7	11	12	1	2	0	5	3	0	17	18	I	19	S	20	2	
Remarks																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----													
67						70	N	71	N	72	N	73		74	75														80

Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> Unilever IU of AR0037907 (Tracking) 2407 Quality Way AR0043401 receives discharge Jonesboro, AR Craighead Co.	Entry Time/Date 1620 5/30/2012	Permit Effective Date 7/1/2011
	Exit Time/Date 1710 5/30/2012	Permit Expiration Date 6/30/2016
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Fran Haslag/Safety, Health & Env. Manager/870-910-1107	Other Facility Data \PDS #066322	
Name, Address of Responsible Official/Title/Phone and Fax Number Fran Haslag/Safety, Health & Env. Manager/870-910-1107 Unilever 2407 Quality Way Jonesboro, AR 72401	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)

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

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

This facility was inspected during a pretreatment inspection of City Water and Light - Jonesboro, AR and has an active permit issued by the POTW.

Details are attached and also available in the full PCI report.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date June 4, 2012
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

Industrial User Site Visit

Name of Industry: Unilever

Industry Contacts: Fran Haslag/Safety, Health & Env. Manager/870-910-1107

Type of Industry: Personal Care Products – Perfumes, Cosmetics, Shampoo, Conditioner, etc.

Date of Visit: May 30, 2012

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

Additional Comments:
Appeared satisfactory at the time of inspection.

Visit Conducted by: Brent L. Walker *Brent L Walker* **Date:** 6/4/2012