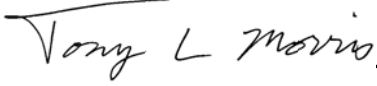
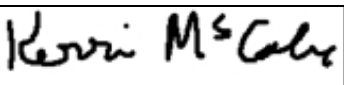
 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 36.00038		PERMIT #: AR0022187		DATE: 10/1/2015
		COUNTY: 36 Johnson		PDS #: 087437		MEDIA: WN
		GPS LAT: 35.4461 LONG: -93.4855 LOCATION: General Area				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: Clarksville Light & Water Co LOCATION: 1305 S. Crawford CITY: Clarksville, AR			FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 26588 S - State	
			FACILITY EVALUATION RATING: N		INSPECTION TYPE: Pretreatment Compliance	
			DATE(S): 10/1/2015	ENTRY TIME: 08:00	EXIT TIME: 14:20	PERMIT EFFECTIVE DATE: 10/1/2014 PERMIT EXPIRATION DATE: 9/30/2019
RESPONSIBLE OFFICIAL						
NAME / TITLE: John Lester / General Manager COMPANY: Clarksville Light & Water Co MAILING ADDRESS: P.O. Box 1807 CITY, STATE, ZIP: Clarksville AR 72830 PHONE & EXT. / FAX: / EMAIL:			FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: No			INSPECTION PARTICIPANTS			
NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Gregg Rainey / Pollution Control Facility Superintendent / 479-979-5509 Pam Smith / Lab Superintendent & Pretreatment Coordinator / 479-754-7229						
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
N	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER	
N	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW	
N	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM	
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT	
**	OTHER:					
SUMMARY OF FINDINGS						
No permit violations were noted during this inspection.						
GENERAL COMMENTS						
INSPECTOR'S SIGNATURE: 				DATE: 10/7/2015		
SUPERVISOR'S SIGNATURE: 				DATE: 10/30/2015		

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: **12/17/2013**

Date of Last Annual Report: **1/22/2015**

Name of Inspector: **Tony Morris**

Date PCI Performed: **10/1/2015**

Name, Title, and Telephone Number of Facility Representative:
Gregg Rainey, P. C. Facility Superintendent, 479-754-6241
Pam Smith, Pretreatment Coordinator, 479-754-6241

Name and Title of Other Participants: **Alana Sullivan, ADEQ**
Dannielle Gray, ADEQ

Number of IUs Visited: **3**

Name(s) of IUs Visited: **Hanesbrand, Greenville Tube, Bright Harvest**

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, CLWC provides water to new Customers.

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: 1

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:
<u>Greenville Tube</u>	<u>Metal Finishing</u>	<u>Acid wash</u>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? NA (no excursions of water quality)

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>	
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

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.**
All current

4. Does the control document contain the following items?
An expiration date: Yes

Discharge limitations: Yes, flow limit on Hanesbrand.

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

No transferability: 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

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?
1. Notice of violation 2. Letter of violation

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

2. How does the POTW respond to the following violations?
 Effluent limitations: NOV or Letter and corrective action
 Late reports: Letter
 Unpermitted discharges: Notify ADEQ
 Slug loads or spills: NOV or letter; reimburse for POTW harm.

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:
NA			

5. Comments on the POTW's enforcement procedures:

Satisfactory

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**
