

ADEQ

ARKANSAS
Department of Environmental Quality

July 28, 2016

Jake Rice III, PE, Manager
Jonesboro City Water and Light
P.O. Box 1289
Jonesboro, AR 72403

RE: Jonesboro City Water and Light – Wastewater Treatment Plant Inspections
AFIN: 16-00936 Permit No.: AR0043401 & ARR000154
16-00152 AR0037907 & ARR000629

Dear Mr. Rice:

On June 7, 8 and 9, 2016, I performed Pretreatment Compliance, Compliance Evaluation, Sanitary Sewer Overflow and Stormwater Inspections of the above referenced facilities in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. Copies of the inspection reports are enclosed for your records.

No violations were noted at the time of the inspections. Please refer to the individual inspection reports for any comments.




All Jonesboro CWL personnel encountered during the inspections were very knowledgeable and professional. I greatly appreciate the opportunity to use Jonesboro CWL as a learning/training opportunity for new inspectors.

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

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT					
		AFIN: 16-00936		PERMIT #: AR0043401		DATE: 6/9/2016	
		COUNTY: 16 Craighead			PDS #: 091984		MEDIA: WN
		GPS LAT: 35.791477 LONG: -90.633382 LOCATION: Entrance					
FACILITY INFORMATION			INSPECTION INFORMATION				
NAME: City Water & Light - East WWTP LOCATION: 5205 Ingels Rd. CITY: Jonesboro			FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 52138 S - State		
RESPONSIBLE OFFICIAL NAME / TITLE: Jake Rice III, PE / Manager COMPANY: Jonesboro City Water and Light MAILING ADDRESS: P.O. Box 1289 CITY, STATE, ZIP: Jonesboro AR 72403 PHONE & EXT. / FAX: 870-935-5581 / 870-930-3301 EMAIL: jrice@jonesborocwl.org CONTACTED DURING INSPECTION: Yes			FACILITY EVALUATION RATING: N		INSPECTION TYPE: Pretreatment Compliance		
			DATE(S): 6/9/2016	ENTRY TIME: 08:00	EXIT TIME: 14:00	PERMIT EFFECTIVE DATE: 3/1/2012	
			6/8/2016	08:00	16:30	PERMIT EXPIRATION DATE: 2/28/2017	
			6/7/2016	09:00	16:10		
			FAYETTEVILLE SHALE RELATED: N				
			FAYETTEVILLE SHALE VIOLATIONS: N				
			INSPECTION PARTICIPANTS				
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: CWL: Adam Saulsbury, Steve Johnson, Myra Taylor, Jody Gibson, Jay Earley ADEQ: Jason Bolenbaugh, Sarah Frasher, Keith Waters, Brent Walker				
AREA EVALUATIONS							
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)							
S	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER		
S	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		
N	OTHER:						
SUMMARY OF FINDINGS							
No violations were noted at the time of the inspection. Very thorough and well organized pretreatment program. See the attached Pretreatment Report for additional information.							
GENERAL COMMENTS							
This inspection was performed in conjunction with Compliance Evaluation, Sanitary Sewer Overflow and Industrial Stormwater Inspections of this facility. A letter covering all inspections is attached to this Pretreatment Compliance Inspection.							
INSPECTOR'S SIGNATURE:  Brent L. Walker				DATE: 7/22/2016			
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh				DATE: 7/25/2016			

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Jonesboro City Water and Light

AFIN Number: 16-00936, 16-00152

NPDES Permit Number(s): AR0043401, AR0037907

Program Tracked under NPDES Permit Number: AR0043401

Fact Sheet Preparation Date: N/E

Date of Last PCI/Audit: Last Audit September 16-18, 2014

Date of Last Annual Report: December 23, 2015

Name of Inspector: Brent Walker

Date PCI Performed: June 7, 8 & 9, 2016

Name, Title, and Telephone Number of Facility Representative:
Myra Taylor, Laboratory Supervisor
Adam Saulsbury/Water and Wastewater Department Supervisor

Name and Title of Other Participants: _____
Jody Gibson/Pretreatment Specialist Jay Earley/Lab and Pretreatment Coord.

Number of IUs Visited: 3

Name(s) of IUs Visited: Nestle Foods, Unilever, Trinity Rail

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. Trinity Rail - Added, Best Manufacturing Added, G&K - Closed, JK Products - Closed

2. Has ADEQ or EPA been notified of these changes? Yes

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) 15

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 program. Include the name of the IU, the regulatory category (such as Metal Finishing), and the regulated process (phosphatizing, 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
Apex Tool	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)
Best Manufacturing	Metal finishing	Phosphatizing line

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Nothing beyond categorical limits

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 Permit:	Program:	Comments:
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? 15 permits (plus 36 carwashes as of May 2016)

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.
NicePak Expired 5/31/2016, but is the process of renewal

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>	<u>2/year</u>
	(IU Specific)	
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:

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: 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: Good
CWL is continuing to update and improve their inspection processes.

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:
N/A	N/A	N/A	N/A

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

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: Nestle

POTW Name: Jonesboro CWL

Industry Contacts: Pretreatment Plant Operated by Jonesboro CWL

Date and Time of Visit: 6/9/2016 @ 0915 to 0945

Description of Manufacturing Process:
Primarily frozen entrees

Sources of Process Wastewater:
Food manufacturing, steam production, wash down, cleaning and sanitation.

Categorical Industry? No

Basis for Limits: General Sewer Use Ordinance

Point of Application: Prior to discharge to collection system

Description of Pretreatment Equipment and Procedures:
Bar screen, rotary sheer, Primary & Secondary DAFs, Reaction Tank, Polymer & Chemical Option, EQ Tank

Spill Prevention and Solvent Management Procedures:
Written spill plan including notification of City Water & Light in the event of a slug load or spill. No floor drains in the facility.

Sampling Location and Equipment:
Separate pretreatment facility operated by CWL - Jonesboro. Composite sampler provided and maintained by CWL

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Unilever

POTW Name: Jonesboro CWL

Industry Contacts: Bonnie Beard - SHE Coordinator

Date and Time of Visit: 6/9/2016 @ 0955 to 1030

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: General Sewer Use Ordinance

Point of Application: Prior to discharge to collection system

Description of Pretreatment Equipment and Procedures:
2 EQ Tanks, 2 Sludge Tanks, Chemical addition, DAF, Floc Tubes

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:
East side of building - composite sampler

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Trinity Rail

POTW Name: Jonesboro CWL

Industry Contacts: Barbara Rutt - EHS Manager

Date and Time of Visit: 6/9/2016 @ 1040 to 11:50

Description of Manufacturing Process:
Railcar repair, relining, painting, etc.

Sources of Process Wastewater:
Railcar cleaning

Categorical Industry? No

Basis for Limits: General Sewer Use Ordinance

Point of Application: Prior to discharge to collection system

Description of Pretreatment Equipment and Procedures:
Polymer addition, bentonite clay, 200 micron filtration

Spill Prevention and Solvent Management Procedures:
Only drains are the in the wash rack area.
No drains/wastewater generated in repair areas.

Sampling Location and Equipment:
Composite sampler at wash rack area

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Brent Walker</u>	
NAME OF FACILITY:	<u>Jonesboro CWL</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0043401 & AR0037907</u>	NPID
DATE OF PCI:	<u>June 7, 8 & 9</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>15</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>7</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u></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