

# ADEQ

ARKANSAS  
Department of Environmental Quality

December 5, 2016

John Lester  
Clarksville Light & Water  
PO Box 1807  
Clarksville, AR 72830

**RE: Pretreatment Industrial User - Bright Harvest Sweet Potato Co (Johnson Co)**  
**AFIN: 36-00038 NPDES Permit No.: AR0022187**

Dear Mr. Lester:

On November 17, 2016 I performed an Industrial User Inspection of the above-referenced 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. A copy of the inspection report is enclosed for your records.

**Please refer to the "Summary of Findings" section of the attached inspection report and provide a written response for each finding that was noted.** This response should be mailed to the attention of the Office of Water Quality, Inspection Branch at the address at the bottom of this letter or e-mailed to [Water-Inspection-Report@adeq.state.ar.us](mailto:Water-Inspection-Report@adeq.state.ar.us). This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e., photos) is due by **December 19, 2016**.

If I can be of any assistance, please contact me at [grayd@adeq.state.ar.us](mailto:grayd@adeq.state.ar.us) or (479) 424-0333.

Sincerely,



Dannielle Gray  
District 4 Field Inspector  
Office of Water Quality

cc: Greg Rainey, Clarksville Light and Water Pollution Control Facility Superintendent,  
[Gregg.rainey@clarksvillelightwater.com](mailto:Gregg.rainey@clarksvillelightwater.com)  
Pam smith, Clarksville Light and Water, Pretreatment Coordinator,  
[pam.smith@clarksvillelightwater.com](mailto:pam.smith@clarksvillelightwater.com)  
Misty Morehead, Bright Harvest Sweet Potato Co., R & D Manager,  
[mmorehead@brightharvest.com](mailto:mmorehead@brightharvest.com)



**A R K A N S A S**  
Department of Environmental Quality

## OFFICE OF WATER INSPECTION REPORT

AFIN: <b>36-00038</b>	PERMIT #: <b>AR0022187</b>	DATE: <b>11/16/2016</b>
COUNTY: <b>36 Johnson</b>	PDS #: <b>094261</b>	MEDIA: <b>WN</b>
GPS LAT:	LONG:	LOCATION: <b>N/A</b>

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: <b>Bright Harvest Sweet Potato Co</b> LOCATION: <b>509 Taylor Road</b> CITY: <b>Clarksville</b>	FACILITY TYPE: <b>2 - Industrial</b> INSPECTOR ID#: <b>71330 S - State</b> FACILITY EVALUATION RATING: <b>2 - Marginal</b> INSPECTION TYPE: <b>Industrial User</b> DATE(S): <b>11/16/2016</b> ENTRY TIME: <b>09:15</b> EXIT TIME: <b>13:30</b> PERMIT EFFECTIVE DATE: <b>10/1/2014</b> PERMIT EXPIRATION DATE: <b>9/30/2019</b>
RESPONSIBLE OFFICIAL	FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>
NAME / TITLE: <b>John Lester / General Manager</b> COMPANY: <b>Clarksville Light and Water</b> MAILING ADDRESS: <b>PO Box 1807</b> CITY, STATE, ZIP: <b>Clarksville AR 72830</b> PHONE & EXT. / FAX: <b>/</b> EMAIL:	INSPECTION PARTICIPANTS
CONTACTED DURING INSPECTION: <b>No</b>	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Johnny Finn/Environmental Technician/479-754-6313</b> <b>Doug Tate/Environmental Supervisor/479-754-6313</b> <b>Greg Rainey/Clarksville POTW Facility Superintendent/479-979-5509</b> <b>Pam Smith/Pretreatment Coordinator/479-754-6241 ext304</b>

### AREA EVALUATIONS

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

S	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	U	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	**	PRETREATMENT
**	OTHER:				

### SUMMARY OF FINDINGS

The following findings were noted during inspection:


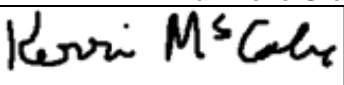
**1. Bright Harvest Sweet Potato is not properly operating its pretreatment clarifiers. Specifically, clarifiers are not being pumped of sludge in a manner, which allows for optimal operation of the pretreatment system. As such, both clarifiers are sludge laden and Pond #1 is septic and malfunctioning. The Permittee, Clarksville Light and Water, was investigating the Industrial User (IU) at the time of inspection. The Permittee will need to submit a statement to ADEQ indicating any non-compliance identified and actions taken to address them.**

**GENERAL COMMENTS**

I inspected this IU on November 17, 2016. Mr. Finn and Mr. Tate accompanied my on my inspection. Following inspection, I met with Mr. Greg Rainey to discuss the findings of my inspection and obtain information regarding the City's response.

During inspection, it was noted that Bright Harvest Sweet Potato is not properly operating its pretreatment clarifiers. Specifically, clarifiers are not being pumped of sludge in a manner, which allows for optimal operation of the pretreatment system. As such, both clarifiers are sludge laden and Pond #1 is septic and malfunctioning. During inspection, I informed Mr. Finn that the facility needed to evaluate its operating procedures and implement a more stringent sludge pumping practice to improve functionality of the pretreatment facility.

Following inspection, I met with Mr. Greg Rainey and Ms. Pam Smith to discuss my findings. Mr. Rainey informed that the City was aware of the issue and had been out on Monday, November 14<sup>th</sup> to collect a sample. At the time of inspection, the City was awaiting the results of the sample. Mr. Rainey informed that the City would be conducting a follow-up IU inspection after obtaining the results. He further stated that the operational issues at Bright Harvest Sweet Potato Company were not causing Clarksville's POTW to experience any upsets at the time of the inspection.

INSPECTOR'S SIGNATURE:  Dannielle Gray	DATE: 12/2/2016
SUPERVISOR'S SIGNATURE: 	Kerri McCabe DATE: 12/5/2016

**POTW Pretreatment Program**

**Industrial Site Visit**

**Name of Industry:** Bright Harvest Sweet Potato Company

**Industry Contacts:** Johnny Finn 479-754-6313, Doug Tate 479-754-6313, & Misty Morehead 479-647-3898

**Type of Industry:** Food Processing and Preparation (Sweet Potatoes)

**Date of Visit:** 11/17/2016

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

**Additional Comments:** SLUDGE BUILDUP OBSERVED IN BOTH CLARIFIERS AND POND #1. PRETREATMENT PLANT WASN'T FUNCTIONING OPTIMALLY DURING INSPECTION, AND OFFENSIVE ODOR WAS NOTED.

**Visit Conducted By:** Dannielle Gray

**Date of Report:** 12/2/2016



**Office of Water Photographic Evidence Sheet**

Location:	<b>Bright Harvest Sweet Potato Co</b>		
Photographer:	<b>Dannielle Gray</b>	Date:	<b>11/17/2016</b>
Witness:	<b>Johnny Finn &amp; Doug Tate</b>	Time:	<b>1208</b>
		Photo #:	<b>1</b>
Description:	<b>Primary Clarifier – note sludge buildup.</b>		



Photographer:	<b>Dannielle Gray</b>	Date:	<b>11/17/2016</b>
Witness:	<b>Johnny Finn &amp; Doug Tate</b>	Time:	<b>1212</b>
		Photo #:	<b>2</b>
Description:	<b>Secondary Clarifier and Pond #1 – note sludge buildup in secondary clarifier.</b>		



**Figure 1. Google Earth image dated October 13, 2016 showing pretreatment plant overview and components.**





# ADEQ

ARKANSAS  
Department of Environmental Quality

December 27, 2016

Greg Rainey, Superintendent  
Clarksville Light and Water POTW  
P.O. Box 1807  
Clarksville, AR 72830

**RE: Response to Inspection (Johnson Co)**  
**AFIN: 36-00038** **NPDES Permit No.: AR00022187**

Dear Mr. Rainey:

I have reviewed the response pertaining to my November 16, 2016 Industrial User inspection of the Bright Harvest Sweet Potato Company facility. The information provided sufficiently addresses the violations referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

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 (479) 424-0333 or you may e-mail me at [grayd@adeq.state.ar.us](mailto:grayd@adeq.state.ar.us).

Sincerely,



Dannielle Gray  
District 4 Field Inspector  
Office of Water Quality

cc: Gregg Rainey, Clarksville Light and Water, Pollution Control Facility  
Superintendent, [Gregg.rainey@clarksvillelightwater.com](mailto:Gregg.rainey@clarksvillelightwater.com)

**From:** [Gray, Dannielle](#)  
**To:** [McConnell, Melissa](#)  
**Cc:** [McCabe, Kerri](#)  
**Subject:** WID 21245  
**Date:** Wednesday, January 04, 2017 10:33:20 AM  
**Attachments:** [B00010NDGf11.pdf](#)

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Please attach this pdf to WID 21245. I pulled this response off of zylab, and it is dated December 6, 2016. Please attach it to the file BEFORE the adequate response letter that is already attached to the electronic file, in order to maintain the timeline. Thank you.

Dannielle Gray  
ADEQ Water Inspector, District 4  
(479) 424-0333



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

December 6, 2016

Arkansas Department of Environmental Quality  
Office of Water Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Re: Pre-Treatment Industrial User - Bright Harvest Sweet Potato, Co (Johnson Co)  
AFIN: 36-00038 NPDES Permit No.: AR0022187

To whom it may concern:

On December 5, 2016, Clarksville Light and Water received a letter from ADEQ, Office of Water Quality regarding their inspection of Bright Harvest Sweet Potato, Co. Enclosed you will find the requested material stated in fore mentioned letter. This includes a letter of findings of our inspection, pictures, and a copy of the field log where Nebo Services hauled off contents of Bright Harvest's clarifiers. If any more information is needed you can contact me at (479) 774-1270.

Sincerely,

Gregg Rainey, Wastewater Superintendent

Enclosures



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

December 6, 2016

Rex King, President  
509 Taylor Rd  
Clarksville, AR 72830

Dear Mr. King:

On November 30, 2016, Clarksville Light and Water performed their annual industrial inspection for Bright Harvest Sweet Potato, Co. The following findings were observed:

1. The grease separator in the grease trap was turned off.
2. The valves in all outside vats were open.
3. Visual inspection of clarifier showed poor cleanup of product inside of plant. There were chunks and slices of product continuing straight to clarifier.
4. Areas were covered in trash and in need of cleanup.

After our inspection, we received a letter from ADEQ of their inspection findings and our obligations to address this matter. Enclosed is a copy of this letter. Your immediate attention to these areas of non-compliance is required. If you have any questions, you can contact me at (479) 754-6241 Ext. 302.

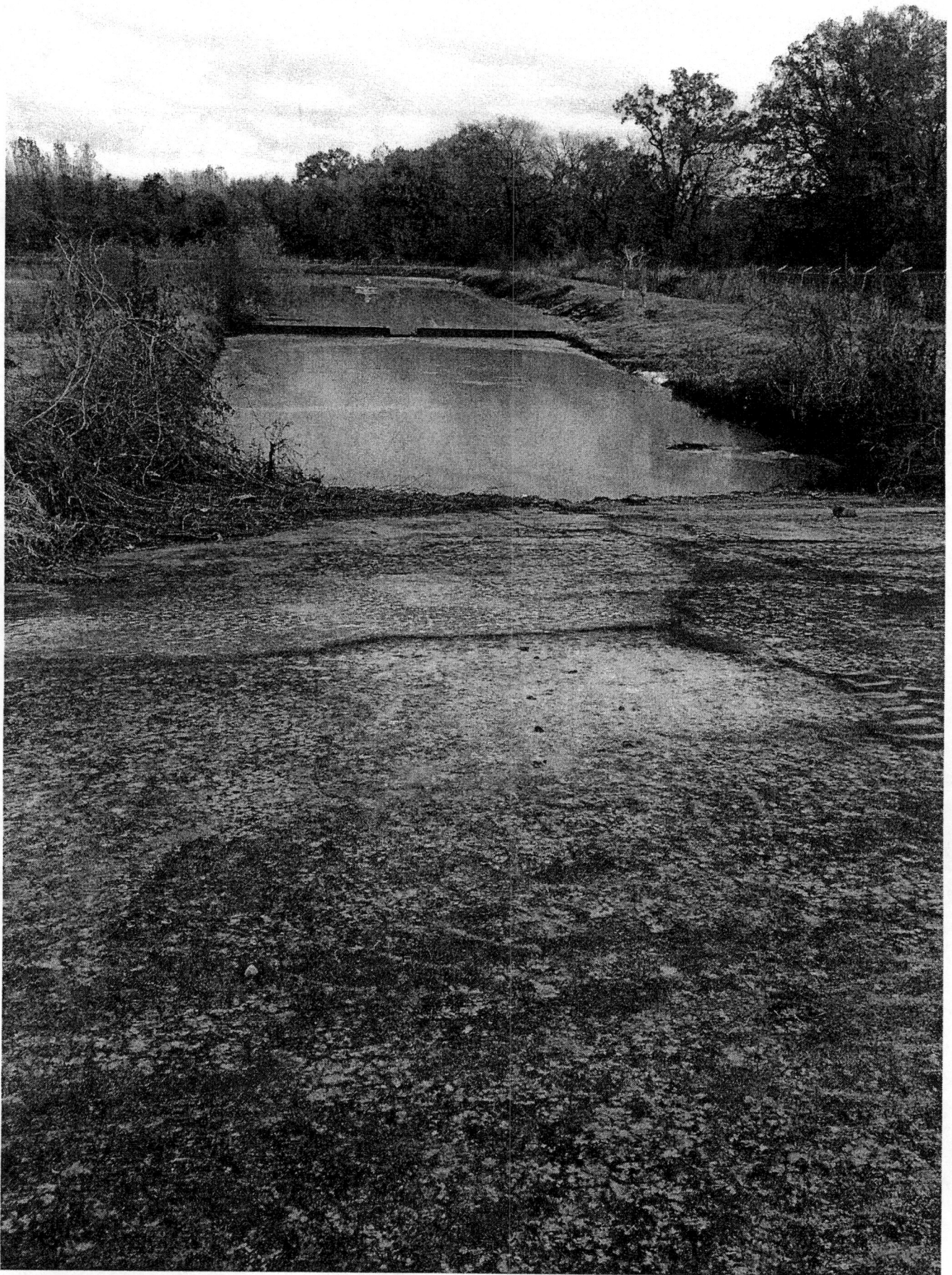
Sincerely,

Gregg Rainey, Wastewater Superintendent

Cc: Reg Johnson

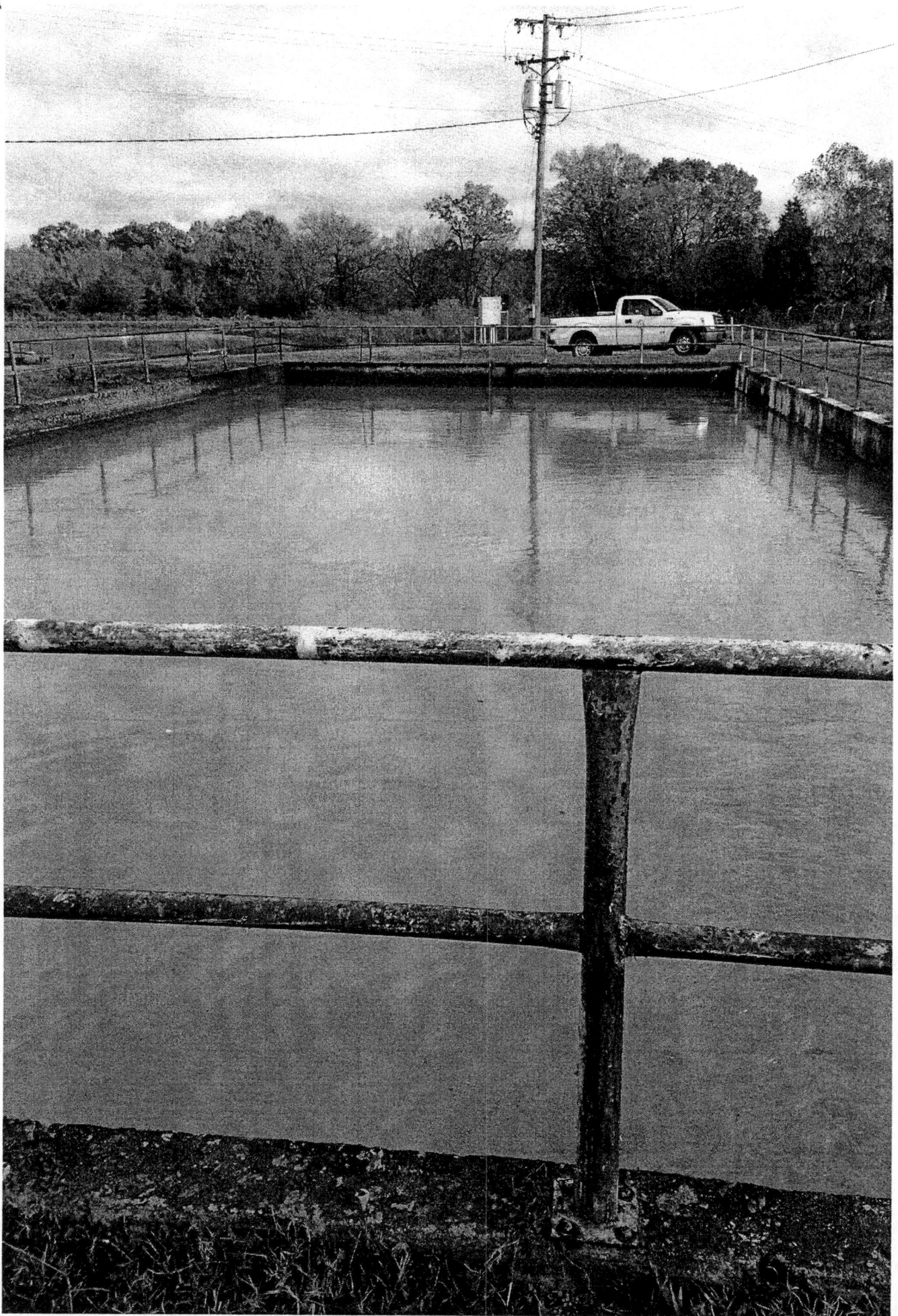
Enclosure

12-6-2016





12-6-2016









# Clarifier Cleaning 2016

## FIELD LOG

Field No.: \_\_\_\_\_ Field Acreage: \_\_\_\_\_ Crop Type: \_\_\_\_\_ Allowable PAN: \_\_\_\_\_  
(Acreage x Crop Uptake Rate)

DATE	TIME	DRIVER NAME	TICKET #	SOURCE FACILITY	WASTE TYPE	LOAD VOLUME	PAN/LOAD	TOTAL PAN REMAINING	NOTES
1	12:34	Elton							
	12:45	Ronnie			GRADY	9 LOADS	AT	4,000 GALLONS = 36,000	
	1:05	Grady							
	1:30	Ricky			CHARLEY	2 LOADS	AT	3,700 GALLONS = 7,400	
5	1:50	Elton							
	2:07	Grady			ELTON	7 LOADS	AT	6,500 GALLONS = 45,500	
	2:17	Ronnie							
	2:40	Ricky			RONNIE	5 LOADS	AT	6,500 GALLONS = 32,500	
	2:59	Grady							
10	3:03	Elton			RICKY	7 LOADS	AT	6,500 GALLONS = 45,500	
15									
20									

TOTAL  
 166,900

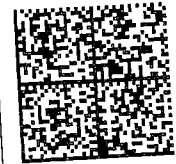
Carry over to next field log page

Operator Signature: Scott Ballard

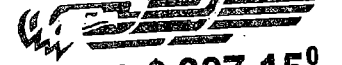
Date: \_\_\_\_\_



7012 2210 0001 7782 0367



U.S. POSTAGE



ZIP 72830 \$ 007.15<sup>0</sup>  
02 1W  
0001370120 DEC. 06. 2016

**CLARKSVILLE LIGHT & WATER CO.**

400 WEST MAIN • P.O. BOX 1807  
CLARKSVILLE, AR 72830  
PHONE (479) 754-3148

**To** Arkansas Dept. of Environmental Quality  
Office of Water Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

