

Henderson, Katie

From: Torrence, Rufus
Sent: Thursday, December 22, 2011 12:36 PM
To: Myra Taylor
Cc: Susan Merideth (smerideth@jonesborocwl.org); 'Adam Saulsbury'
Subject: FW: AFIN 16-00936 AR0043401, AFIN 16-00152 AR0037907 City of Jonesboro 2010 Annual Report
Attachments: JOBO CWL 2010 Annual Report.pdf



December 22, 2011

Ms. Myra Taylor, Lab Supervisor
City Water & Light
400 East Monroe
P O Box 1289
Jonesboro, Arkansas 72403-1289

Re: City of Jonesboro 2010 Annual Pretreatment Report
(Permit No. AR0020010, AR0050288 AFIN 72-00102)

Dear Ms. Taylor:

The Department has reviewed the City's 2010 Annual Pretreatment Report and the Department is sending this email to deem the report complete. However, the Department has one requirement and two recommendations to improve the City's program operation and reporting:

Requirement:

The local limit development is a dynamic process. CWL is currently updating the local limit language in the pretreatment ordinance to give the Manager (or his representative) the authority to update local limits as necessary (with ADEQ approval) without having to update the pretreatment ordinance. At a minimum CWL should update the removal efficiencies quarterly as new influent and effluent data becomes available.

Based on the proposed language in the new pretreatment ordinance and the data submitted in the annual report, the Department will approve a new removal efficiency for Mercury for both the West Side and East Side plant. Three influent Mercury concentrations (0.0909 µg/l , 0.0419 µg/l & 0.0312 µg/l) exceeded the MAHC (0.026 µg/l) at the Westside plant. Three influent Mercury concentrations (0.0731 µg/l , 0.08276 µg/l &

0.08767 µg/l) exceeded the MAHC (0.059 µg/l) at the Eastside plant. Based on this data, the Department has determined that the new removal efficiency for both plants must be at least 85%. Therefore, the new Mercury MAHC for both the Eastside and Westside plant is 0.089 µg/l for the 2010 annual report.

In the future, CWL must update the removal efficiencies each quarter if necessary. Since the MAHC (based on new rem eff) can change quarterly, the Department recommends that CWL requests approval from ADEQ only once each year in the annual report to verify and approve the current MAHC and MAHL if an update is necessary. Please note that CWL may change the allocation of the MAHL at any time without ADEQ approval. However, CWL must not change the MAHL without first getting approval from ADEQ. Consequently, if CWL needs to change the “official” MAHC/MAHL before the annual report is due, then CWL may submit the request at that time.

Mercury was not detected in the effluent at the Eastside plant. However, the Mercury (0.0117 µg/l) in the effluent at the Westside plant almost exceeded the Mercury WQS (0.013 µg/l). CWL must control or abate the sources of Mercury entering the Westside plant to ensure compliance with the WQS.

Recommendations:

1. Please include a cover letter with your report addressed to:

Rufus Torrence, Engineer / Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

2. The City may submit any pertinent information but the Departments requires only the following seven/eight pages:

Cover Letter
Newspaper Publication of SIUs in SNC (If applicable)
Influent/Effluent Charts
Attachment A (Updated SIU List)
Attachment B (Enf Actions)
Attachment C (PPS); page 1 & 2

Please review the attached “streamlined” annual report.

The Department appreciates the City’s continued efforts in annual reporting.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us

Sincerely,



Rufus Torrence, Pretreatment Engineer

Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5901 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-9317 / TELEPHONE 501-682-0744 / FAX 501-
www.adeq.state.ar.us



Owned by the Citizens of Jonesboro

December 19, 2011

Mr. Rufus Torrence
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118

RETURN RECEIPT
CERTIFIED MAIL

Re: 2010-2011 Annual Pretreatment Status Report

Dear Mr. Torrence,

Enclosed is our 2010-2011 Annual Pretreatment Status report for NPDES permit AR0043401 & AR0037907. This should satisfy the requirements stated in our NPDES Permit.

If more information is required, please contact my office at 870.930.3389.

Sincerely,

Myra Taylor
CWL Lab Supervisor

- ① Int-Eft logged
- ② ICIS coded/Cover letter att
- ③ IU's checked
- ④ Annual Report Form Updated

Ronald L. Bowen, MANAGER

CITY WATER & LIGHT • 400 East Monroe • P.O. Box 1289 • Jonesboro, Arkansas 72403-1289 • 870/935-5581

Monitoring Results For The Annual Pretreatment Report
 Reporting Year: October 1, 2010 To September 30, 2011
 Treatment Plant: City Water & Light Westside NPDES Permit # AR0037907
 Average Flow : 1.5017 MGD % IU Flow 22.405 %

Metals, Cyanide and Phenols (Total)	MAHC (ug/L)	Influent Dates Sampled (ug/L) Once/Quarter				WQ Level/ Limit (ug/L)	Effluent Dates Sampled (ug/L) Once/Quarter				Laboratory Analysis					
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (ug/L)	EPA Method used	Detection Level Achieved MQL (ug/L)			
		10/13/10	3/10/11	6/15/11	9/14/11		10/14/10	3/11/11	6/16/11	9/15/11						
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	0	0	60.0	200.8	60.0	
Cadmium	13.0	0	0	0	0	3.99	0	0	0	0	0	0	0.5	200.8	0.5	
Copper	114.0	44.4	29.1	33.3	33.3	29.475	13.30	11.5	10.7	11.4	0.5	0.5	0.5	200.8	0.5	
Lead	65.0	10.2	3.28	3.82	5.45	11.7	1.30	0.625	0.704	0.577	0.5	0.005	0.005	1631E	0.005	
Mercury	0.026	0.0909	0.0096	0.0419	0.0312	0.013	0.0117	0.006	0.0049	0.006	0.5	0.5	0.5	200.8	0.5	
Nickel	250.0	7.61	4.59	7.75	5.44	322.655	4.85	3.57	3.76	3.45	5.0	5.0	5.0	200.8	5.0	
Selenium	12.0	0	0	0	0	5.58	0	0	0	0	0	0	0.5	200.8	0.5	
Silver	36.0	0.611	0	0	0	6.905	0	0	0	0	0	0	20.0	200.8	20.0	
Zinc	323.0	133	74.1	89.8	100	281.872	31.0	28.2	23.4	21.4	10.0	10.0	10.0	200.8	10.0	
Chromium	1000.0	0	0	0	0	816.848	0	0	0	0	10.0	10.0	10.0	4500CNE	10.0	
Cyanide	14.0	0	0	0	0	5.803	0	0	0	0	0.5	0.5	0.5	200.8	0.5	
Arsenic	39.0	7.66	5.45	10.5	6.30	N/A	7.18	5.59	6.96	5.10	0.5	0.5	0.5	200.8	1.0	
Molybdenum	83.0	5.12	3.89	11.2	12.7	N/A	4.98	3.16	10.9	7.57	5.0	5.0	5.0	420.1	5.0	
Phenols	4000.0	0	0	8.0	16.0	N/A	0	0	0	0	0.5	0.5	0.5	200.8	0.5	
Beryllium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	0.5	0.5	200.8	0.5	
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	0.5	0.5	200.8	0.5	
Flow, MGD	N/A	1.1449	1.6018	1.3829	1.2900	N/A	1.1348	1.4262	1.4867	1.1337						
Hephtachlor	N/A	0.126														
Mercury Sample Dates		12/07/10	03/16/11	06/20/11	09/20/11		12/08/10	03/17/11	06/21/11	09/21/11						

* ⇒ Removal Efficiency is > 85% > 50% ∴ the MAHC for Mercury = 0.089 mg/L.

Monitoring Results For The Annual Pretreatment Report
 Reporting Year: October 1, 2010 To September 30, 2011
 Treatment Plant: City Water & Light Eastside NPDES Permit # AR0043401
 Average Flow : 6,8444 MGD % IU Flow 23.13 %

Metals, Cyanide and Phenols (Total)	MAHC (ug/L)	Influent Dates Sampled (ug/L) Once/Quarter				WQ Level/ Limit (ug/L)	Effluent Dates Sampled (ug/L) Once/Quarter				Laboratory Analysis					
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (ug/L)	EPA Method used	Detection Level Achieved MQL (ug/L)			
		10/12/10	1/18/11	6/14/11	8/9/11		10/14/10	1/20/11	6/16/11	8/11/11						
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	0	0	60.0	200.8	60.0	
Cadmium	12.0	0	0	0	0	3.99	0	0	0	0	0	0	0.5	200.8	0.5	
Copper	88.0	64.1	39.5	42.6	70.7	29.475	6.07	4.42	4.33	5.980	0	0	0.5	200.8	0.5	
Lead	30.0	5.1	1.8	2.45	2.73	11.7	0.760	0	0	0.595	0	0	0.5	200.8	0.5	
Mercury	0.059	0.0731	0.08276	0.08767	0.0257	0.013	0	0	0	0	0	0	0.005	1631E	0.005	
Nickel	140.0	7.78	4.06	4.77	5.63	322.655	2.68	1.87	2.36	2.91	0	0	0.5	200.8	0.5	
Selenium	12.0	0	0	0	0	5.58	0	0	0	0	0	0	5.0	200.8	5.0	
Silver	66.0	4.42	1.66	2.67	2.69	6.905	0	0	0	0	0	0	0.5	200.8	0.5	
Zinc	407.0	185	110	146	178	281.872	50.4	53.2	54.9	66.6	0	0	20.0	200.8	20.0	
Chromium	250.0	0	0	0	0	816.848	0	0	0	0	0	0	10.0	200.8	10.0	
Cyanide	19.0	0	0	0	0	5.303	0	0	0	0	0	0	10.0	4500CNE	10.0	
Arsenic	23.0	1.82	0	1.24	1.45	N/A	0.707	0	1.05	1.26	0	0	0.5	200.8	0.5	
Molybdenum	77.0	11.0	8.58	21.4	15.4	N/A	9.78	7.60	14.5	12.0	0	0	5.0	420.1	5.0	
Phenols	4000.0	0	0	0	0	N/A	0	0	0	0	0	0	0.5	200.8	0.5	
Beryllium	N/A	0	0	0	0	N/A	0	0	0	0	0	0	0.5	200.8	0.5	
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0	0	0.5	200.8	0.5	
Flow, MGD	N/A	6,9850	6,2145	6,612	6,267	N/A	6,2135	6,4184	6,533	6,445	0	0	0.5	608	0.5	
Hepfachtlor	N/A	0.166	35.6													
Bis(2-ethylhexyl)phthalate	N/A															
Mercury Sample Dates		11/15/10	01/25/11	05/09/11	08/15/11		11/17/10	01/27/11	05/11/11	08/17/11						

* ⇒ Removal Efficiency is 78.1% , the MAHC for Mercury = 0.089 ug/l

Attachment A

Pre-treatment Program Status Report
Updated Significant Industrial Users List

Industrial User	Permit Number	SIC Code	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Compliance Status Reports			Permit Limits	
				Y/N	Action				BMR	90-Day Compliance	Semi-Annual		Self-Monitoring
Colson Casters Corp	8402	3429	Metal Finishing	Y	10/1/2009	No	1	10	N/A*	N/A*	N/A*	N/A*	C
Delta Cons. Industries	8409	3469	Metal Finishing	Y	7/1/2007	No	1	10	N/A*	N/A*	N/A*	N/A*	C
Hytrol Conveyor	8413	3535	Metal Finishing	Y	7/1/2007	No	1	10	N/A*	N/A*	N/A*	N/A*	C
Farr Company	8702	3499	Metal Finishing	Y	11/1/2007	No	1	10	N/A*	N/A*	N/A*	N/A*	C
Thomas & Betts	9502	3644	Metal Finishing	Y	6/1/2010	No	1	10	N/A*	N/A*	N/A*	N/A*	C
Trinity Lighting	9801	3646	Metal Finishing	Y	6/1/2008	No	1	10	N/A*	N/A*	N/A*	N/A*	C
JK Products & Serv.	10001	3648	Metal Finishing	Y	7/1/2010	No	1	5	N/A*	N/A*	N/A*	N/A*	C
RiceLand Foods**	8408	2044	Food Products	Y	10/1/2011	No	1	169	N/A*	N/A*	N/A*	N/A*	NC(pH)
OG Printing II Corp. (World Color)	8414	2752	Printing	Y	7/27/2011	No	1	10	N/A*	N/A*	N/A*	N/A*	C
International Paper****	8901	2653	Paper Products	Y	12/1/2005	No	1	0	N/A*	N/A*	N/A*	N/A*	C
Butterball I.L.C.	9101	2013	Food Products	Y	9/30/2008	No	1	51	N/A*	N/A*	N/A*	N/A*	NC(FOG)
Post Foods	9302	2043	Food Products	Y	2/22/2011	No	1	365	N/A*	N/A*	N/A*	N/A*	C
G & K Services	9701	7218	Auto & Laundries	Y	5/1/2011	No	1	10	N/A*	N/A*	N/A*	N/A*	C
Frito-Lay Inc.	9702	2096	Food Products	Y	9/1/2007	No	1	365	N/A*	N/A*	N/A*	N/A*	C
Nestle Prepared Foods	10205	2099	Food Products	Y	3/1/2011	No	1	365	N/A*	N/A*	N/A*	N/A*	C
Alberto Culver	10801	2844	Perfumes, Cosmetics, Etc.	Y	9/1/2011	No	1	188	N/A*	N/A*	N/A*	N/A*	C
Nice-Pak Products	10811	2844	Perfumes, Cosmetics, Etc.	Y	7/28/2011	No	1	15	N/A*	N/A*	N/A*	N/A*	C
SUM							17	1603					

* CWL Performs All Monitoring For This IU.
 ** RiceLand Foods is operating under an Interim Permit which expires 04/1/12.
 *** International Paper ceased operations November 2010.
 **** CWL currently has 38 permitted, yet Non-Significant Carwashes.

Attachment B

Significant Violations - Enforcement Actions Taken

Industrial User	Nature of Violation		N.O.V	Number of Actions Taken					Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits		A.O	Civil	Criminal	Other	Date Issued		Date Due			
Butterball LLC	0	FOG	2	0	0	0	0	\$0.00	N/A	N/A	C	N/A	
Riceland Foods	0	pH	1	0	0	0	0	\$0.00	N/A	N/A	C	N/A	

* No CWL permitted industries were in Significant Non-Compliance between 9/22/10 - 9/21/11.

Attachment C

page 1 of 2

Pretreatment Performance Summary (PPS)

Note: All questions refer to the Industrial Pretreatment Program as approved by the EPA. The permittee should not answer the questions based on changes made to the approved program without department authorization.

I. General Information

Control Authority Name: City Water and Light Plant of the City of Jonesboro
Address: 400 East Monroe Avenue, P.O. Box 1289
City: Jonesboro
State/ Zip: Arkansas/ 72403-1289
Contact Person (Position): Adam Saulsbury (Pretreatment/Laboratory Coordinator)
Contact Telephone: 870.930.3392
E-mail: asaulsbury@jonesborocwl.org

NPDES Permit Numbers: AR0037907 (Westside POTW) AFIN 16-00152
AR0043401 (Eastside POTW) AFIN 16-00936

Reporting Period
-Beginning Month and Year: October 2010
-Ending Month and Year: September 2011

Total Number of Categorical IUs: 7
Total Number of Significant Non-categorical IUs: 10

II. Significant Industrial User Compliance

	<u>Significant Industrial Users</u>	
	<u>Categorical</u>	<u>Noncategorical</u>
1) Number of SIUs Submitting BMRs/ Total Number Required	<u>NA</u>	<u>N/A</u>
2) Number of SIUs Submitting 90-Day Compliance Reports/ Number Required	<u>NA</u>	<u>N/A</u>
3) Number of SIUs Submitting Semiannual Reports/ Total Number Required	<u>00/00</u>	<u>00/00</u>
4) Number of SIUs Meeting Compliance Schedule/ Total Number Required to Meet Schedule	<u>00/00</u>	<u>00/00</u>
5) Number of SIUs in Significant Noncompliance/ Total Number of SIUs	<u>00/07</u>	<u>00/10</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>0%</u>	


III. Compliance Monitoring Program

	<u>Significant Industrial Users</u>	
	<u>Categorical</u>	<u>Noncategorical</u>
1) Number of Control Documents Issued/ Total Number Required	<u>07/07</u>	<u>10/10</u>
2) Number of Non-sampling Inspections Conducted	<u>07</u>	<u>10</u>
3) Number of Sampling Visits Conducted	<u>65</u>	<u>1538</u>
4) Number of Facilities Inspected (non-sampling)	<u>07</u>	<u>10</u>
5) Number of Facilities Sampled	<u>07</u>	<u>10</u>

III. Enforcement Actions

	<u>Significant Industrial Users</u>	
	<u>Categorical</u>	<u>Noncategorical</u>
1) Number of Compliance Schedules Issued/Number of Schedules Required	<u>00/00</u>	<u>00/00</u>
2) Number of Notices of Violations Issued to SIUs	<u>00</u>	<u>03</u>
3) Number of Administrative Orders Issued to SIUs	<u>00</u>	<u>00</u>
4) Number of Civil Suits Filed	<u>00</u>	<u>00</u>
5) Number of Criminal Suits Filed	<u>00</u>	<u>00</u>
6) Number of Significant Violators (attach newspaper publication)	<u>00</u>	<u>00</u>
7) Amount of Penalties Collected (total dollars/ IUs assessed)	<u>\$0.00/0</u>	<u>\$0.00/0</u>
8) Other Actions (sewer bans, etc.)	<u>00</u>	<u>00</u>

The following certification must be signed in order for this form to be considered complete:
 I certify that the information contained herein is accurate to the best of my knowledge.


 Authorized Representative

12/16/2011
 Date

PPS Program Report

* NPDES ID:

AR 003707
AR 0043401

Permittee's Name: Jonesboro

* Report Received/Event Date:

12/20/2011

Date: 12-20-2011

Report Type

Select a Program Report to add

- Biosolids Program Report
- CAFO Annual Report
- CSO Event Report
- Local Limits Report
- MS4 Program Report
- Pretreatment Performance Summary Report
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

CONT

Report Information

* Pretreatment Performance Summary Start Date: 10/01/2010

Significant Industrial Users (SIUs)

- SIUs: 16
- SIUs Without Control Mechanism: 0
- SIUs Not Inspected: 0
- SIUs Not Sampled: 0
- SIUs in SNC with Pretreatment Standards: 0
- SIUs in SNC with Reporting Requirements: 0
- SIUs in SNC with Pretreatment Schedule: 0
- SIUs in SNC Published in Newspaper: 0
- SIUs Schedules: 0
- Violation Notices Issued to SIUs: 3
- Administrative Orders Issued to SIUs: 0
- Civil Suits Filed Against SIUs: 0
- Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

- CIUs: 7
- CIUs in SNC: 0

Penalties

Dollar Amount of Penalties Collected: \$ []
 Industrial Users (IUs) from which Penalties have been collected: []

Other Information

SUO Reference: []
 SUO Date: []
 Annual Pretreatment Budget: \$ []
 Pass-Through/Interference Indicator: []
 Violation of IU Schedule for Remedial Measures: []
 Immediate Response to Violation of IU Schedule for Remedial Measures: []

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits: []
 Date of Most Recent Adoption of Technically Based Local Limits: []
 Local Limit Pollutants: []
 ADD / REMOVE

Removal Credits

Removal Credits Application Status: Not Applicable
 Date of Most Recent Removal Credits Approval: []
 Removal Credits: []
 ADD / REMOVE

Acceptance of Waste

Acceptance of Hazardous Waste: No
 Acceptance of Non-Hazardous Industrial Waste: No
 Acceptance of Hauled Domestic Wastes: No

Deficiencies

Deficiencies Identified During IU File Review: No
 Control Mechanism Deficiencies: No
 Legal Authority Deficiencies: No
 Deficiencies in Data Management and Public Participation: No
 Deficiencies in Interpretation and Application of Pretreatment Standards: No
 Inadequacy of Sampling and Inspections: No
 Adequacy of Pretreatment Resources: Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling: []
 Annual Frequency of Effluent Toxicant Sampling: []
 Annual Frequency of Sludge Toxicant Sampling: []