



COMMISSIONERS

Melinda Gould
Steven Sosebee
Matt Wylie

Eddie Lindsey
Darrell Weathers
Hugh W. Harrison III, Gen. Mgr.

RECEIVED
FEB 17 2009
*sent e-mail 4/02/09
re: Hg effluent levels
AS*

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

February 12, 2009

Mr. Gene Little

RE: AR0022187 AFIN # 36-00038

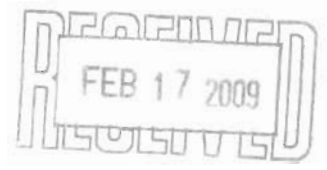
Dear Mr. Little

Please find enclosed our 4th annual list of violator's industrial users as required by our permit. Please note the violations on attachment A. I have included our MAHL as required by our permit. If you have any questions please feel free to call me at 479-754-7929.

Sincerely

Gregg Rainey
Superintendent

Pam Smith
Pretreatment Coordinator



ATTACHMENT C
PRETREATMENT PERFORMANCE SUMMARY (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY ADEQ. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT DEPARTMENT AUTHORIZATION.

I. General Information

Control Authority Name Clarksville Light & Water PCF

Address P.O. Box 1807

City Clarksville State/Zip AR 72830

Contact Person Pam Smith Position Pretreatment Coordinator

Contact Telephone 479-781-7929 NPDES Permit Nos. AR0022187

Reporting Period January 2008 December 2008
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs Two

Total Number of Significant Noncategorical IUs Two

Total Number of Non-Significant (yet permitted) IUs 0

II. Significant Industrial User Compliance

	SIGNIFICANT INDUSTRIAL USERS	
	Categorical	NonCategorical
1) No. of SIUs Submitting BMRs/Total No. Required.	0/0	N/A*
2) No. of SIUs Submitting 90-Day Compliance Reports/No. Required.	0/0	N/A*
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required.	2/2	2/2
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule	0/0	1/1
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs	0/2	0/2
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .		0/0

III. Compliance Monitoring Program

	<u>SIGNIFICANT CATEGORICAL</u>	<u>INDUSTRIAL USERS NonCategorical</u>
1) No. of Control Documents Issued/Total No. Required.	<u>0/0</u>	<u>1/1</u>
2) No. of Nonsampling Inspections Conducted.	<u>2/1</u>	<u>2/1</u>
3) No. of Sampling Visits Conducted.	<u>9/1</u>	<u>6/1</u>
4) No. of Facilities Inspected (nonsampling)	<u>0/1</u>	<u>0/1</u>
5) No. of Facilities Sampled	<u>2/1</u>	<u>2/1</u>

IV. Enforcement Actions

	<u>SIGNIFICANT CATEGORICAL</u>	<u>INDUSTRIAL USERS NonCategorical</u>
1) No. of Compliance Schedules Issued/No. of Schedules Required	<u>0/0</u>	<u>1/1</u>
2) No. of Notices of Violations Issued to SIUs	<u>4</u>	<u>2</u>
3) No. of Administrative Orders Issued to SIUs	<u>0</u>	<u>1</u>
4) No. of Civil Suits Filed.	<u>0</u>	<u>0</u>
5) No. of Criminal Suits Filed	<u>0</u>	<u>0</u>
6) No. of Significant Violators (attach newspaper publication).	<u>0</u>	<u>0</u>
7) Amount of Penalties (not surcharges) Collected (total dollars/IUs assessed)	<u>0/0</u>	<u>0/0</u>
8) Other Actions (sewer bans, etc.)	<u>0</u>	<u>0</u>

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.



Authorized Representative

Date 2-12-09

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: Jan. 2008 TO Dec. 2008
 TREATMENT PLANT: CITY OF CLARKSVILLE NPDES PERMIT #AR0022187
 AVERAGE POTW FLOW: 0.9811 % IU FLOW 5.8970

METALS CYANIDE and PHENOLS (Total)	MAHL ug/l	Influent Dates Sampled (ug/l) Once/Quarter				WQ level/ limit ug/l	Effluent Dates Sampled (ug/l) Once/Quarter							
		2/7/2008	4/23/2008	8/11/2008	10/28/2008		2/8/2008	3/27/2008 Re Test	4/24/2008	8/12/2008	9/30/2008 Re Test			
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	0	0	0	0
Cadmium	5.4	0	0	0	0	5.3	0	0	0	0.64	0	0	0	0
Copper	158	15	16	18	19	45.7	16	18	19	10	12	10	12	12
Lead	51.4	15	3.8	2.1	6	20	3.8	2.1	6	0.63	0	0.63	0	0
Mercury	0.27	0.013	0.021	0.071	0.0377	0.013	0.021	0.071	0.0377	0.028	0.007	0.016	0.046	0.00883
Nickel	42.1	0	6.3	6.1	4.9	51.4	6.3	6.1	4.9	0	5.1	0	12	0
Selenium	8.4	3	0	0	0	5.6	0	0	0	0	0	0	0	0
Silver	57.8	0	3.3	0.6	0.92	14.4	3.3	0.6	0.92	0	0	0	0	0
Zinc	500	67	110	91	92	444	110	91	92	0	52	81	0	0
Chromium	154	0	0	0	0	1190	0	0	0	0	0	0	0	0
Cyanide	18.7	0	0	0	0	5.8	0	0	0	0	0	0	0	0
Arsenic	7	0	0	0.54	0.55	411.00000	0	0.54	0.55	0	0	0	0.57	0
Molybdenum	8	0	0	0	13	N/A	0	0	13	0	0	0	0	0
Phenols	N/A	35	32	40	46	N/A	32	40	46	12	0	0	9.6	0
Beryllium	11.8	0	0	0	0	5.90000	0	0	0	0	0	0	0	0
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0	0	0	0
Flow, MGD	N/A	1.119	0.697	0.794	0.656	N/A	0.697	0.794	0.656	0.945	0.862	0.613	0.794	0.596

	Laboratory Analysis (See Attachment PPS)	
10/29/2008	EPA Method Used	Detection Level Achieved (ug/l)
0	200.8	60
0	200.8	0.5
7.4	200.8	0.5
0	200.8	0.5
0.0068	1631E	0.0005
5.2	200.8	0.5
0	200.8	5
0	200.8	0.5
35	200.8	20
0	200.8	10
0	SM4500	10
0	200.8	0.5
0	200.8	8
0	420.1	5
0	200.8	0.5
0	200.8	0.5
0.511		

COMMISSIONERS



Marvyn G. Smith
Steven Susser
Alan Webb

Eddy Thibodeau
Darrill Weather
Hugh W. Harrison III, Chairman

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

January 3, 2008

Hanesbrands Inc.
P.O. Box 669
Clarksville, AR 72830

Attention Cathy Stalcup

Re: Consent Order

Dear Cathy:

Since the nature of Hanesbrands Inc. (HBI) discharge into the pretreatment plant has changed so dramatically in the past few months, it is necessary that we enter into a consent order, which I have attached.

We understand, and are participating in the design, bidding and procurement of the renovation and addition to the existing pretreatment plant. Once completed, HBI's discharge will be back in compliance with the permit. In the mean time, in order to uphold our pretreatment ordinance it is important that we agree to certain terms and targeted schedules.

Please see attached.

Thank you




Hugh W Harrison
General Manager

CONSENT ORDER

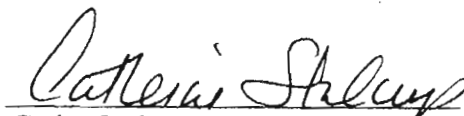
Issued by Clarksville Light & Water Co
To: Hanesbrands Inc.
Duration: January 2008 – September 30, 2008

Whereas Hanesbrands Inc. (HBI) has increased the flow into Clarksville's pretreatment plant, and
Whereas Clarksville is able to treat the additional flow on a temporary basis without detriment to its other customers or to the quality of its effluent, and
Whereas HBI has secured the services of a consulting engineer to work with the City in designing an upgrade to the pretreatment plant, and
Whereas it is expected to take nine months to install the upgrades;

Now therefore, it is mutually agreed: that the flow and loading limitations to HBI will be suspended until the upgrades are operational. HBI recognizes its responsibility to do everything possible to meet all limits all the time. Sampling frequencies for BOD, TSS, O/G and flow to remain as outlined in discharge permit and shall be report only. It is further agreed that HBI's engineer will provide benchmark schedule to CL&W throughout construction period.

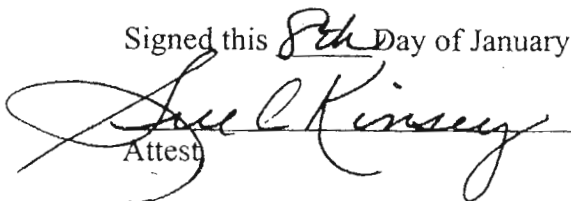


Hugh W Harrison
General Manager

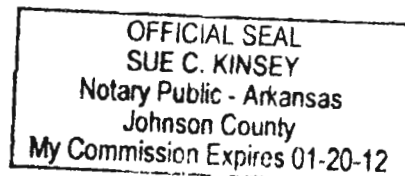


Cathy Stalcup
Plant Manager

Signed this 8th Day of January 2008



Attest



MI
COMMISSIONERS



Christel Thompson
Steven Sosebee
Matt Wylie

Eddie Lindsey
Darrell Weathers
Hugh W. Harrison III, Gen. Mgr.

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

September 16, 2008

Hanesbrands Inc.
P.O. Box 669
Clarksville, AR 72830

ATTN: Cathy Stalcup

Re: Consent Order Extension

Dear Cathy

Clarksville Light & Water Co issued a Consent Order in January of this year to Hanesbrands for report only, the values for BOD, TSS, O/G and flow. That order expires September 30, 2008.

This letter is to notify you that the Consent Order has been extended to February 20, 2009.

This extension coincides with the construction time allowed in the contract to build the upgrades and bring Hanesbrands Inc. discharge into compliance with Clarksville's Pretreatment Ordinance.

Thank you.



Hugh W. Harrison
General Manager

Cc: Gregg Rainey
Allen Giliam ADEQ

COMMISSIONERS



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

February 5, 2009

Hanesbrands Inc.
P.O. Box 669
Clarksville, AR 72830

ATTN: Cathy Stalcup

Re: Consent Order Extension
Due to Construction Delay

Dear Cathy;

Please be advised that due to construction delays we are extending the expiration date on the consent order to May 20, 2009.

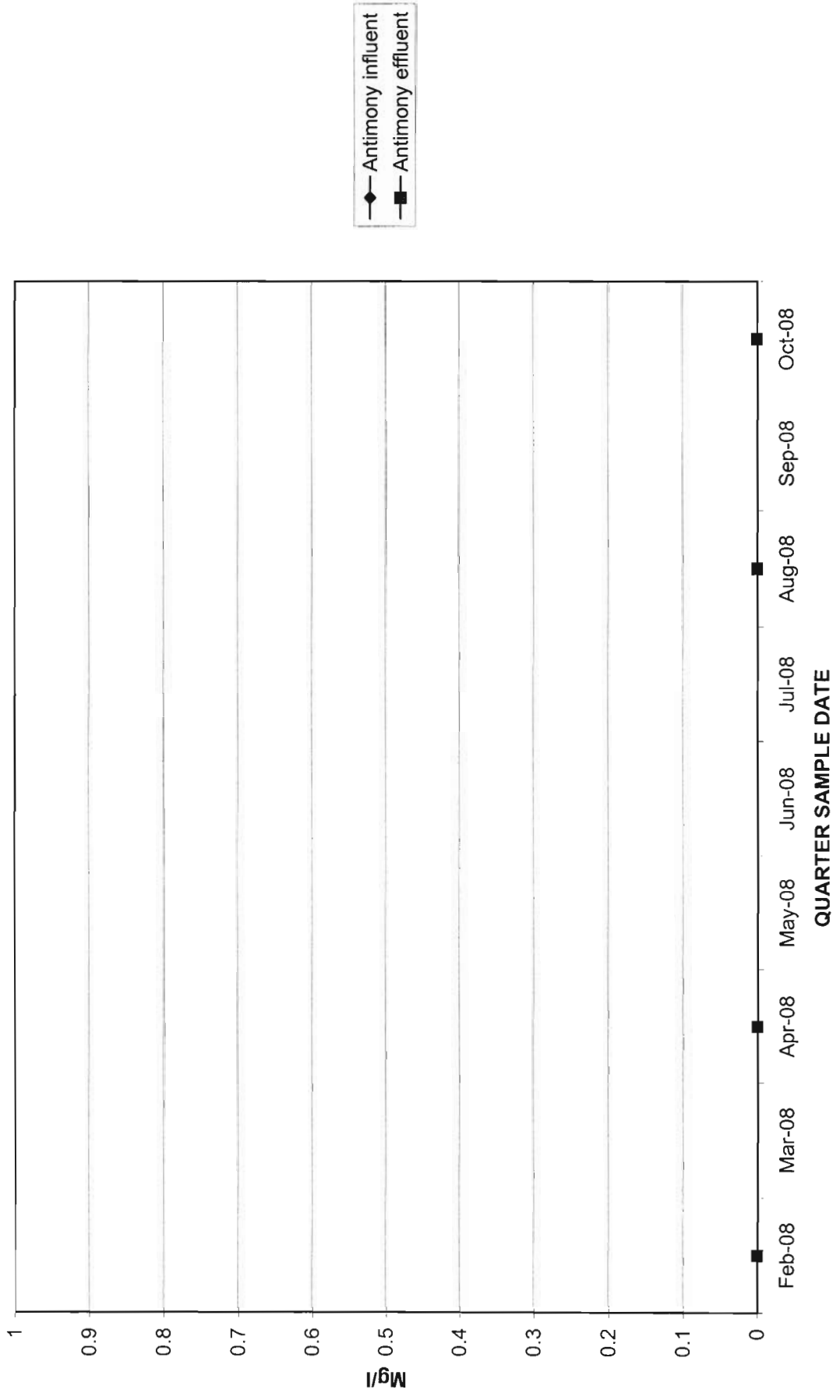
The general contractor has now targeted March 20, 2009 as the new completion date for construction. May 20th will give time to achieve start up and compliance with discharge permit parameters.

Thank you.

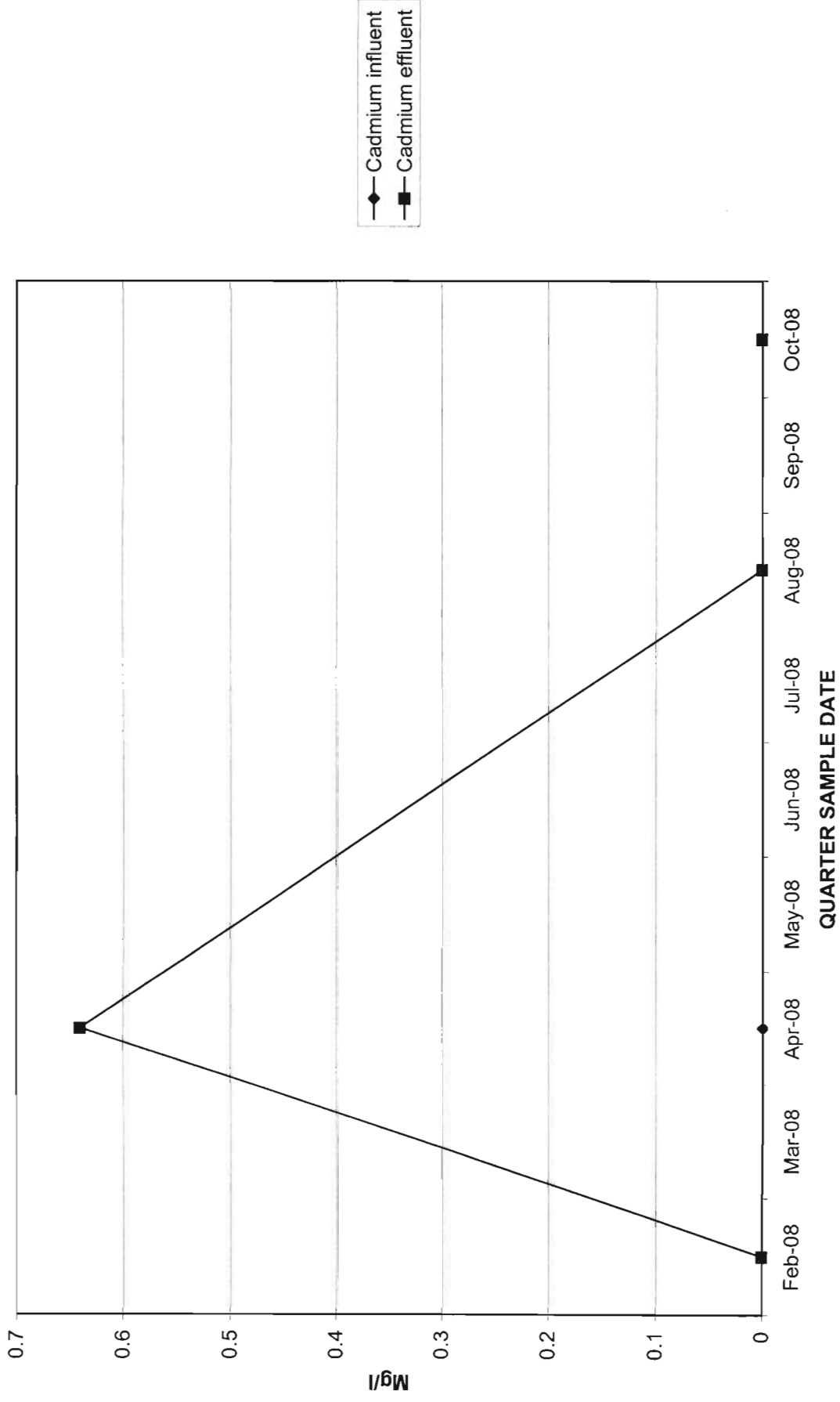

Hugh W. Harrison

Cc: Gregg Rainey
Allen Gilliam - ADEQ

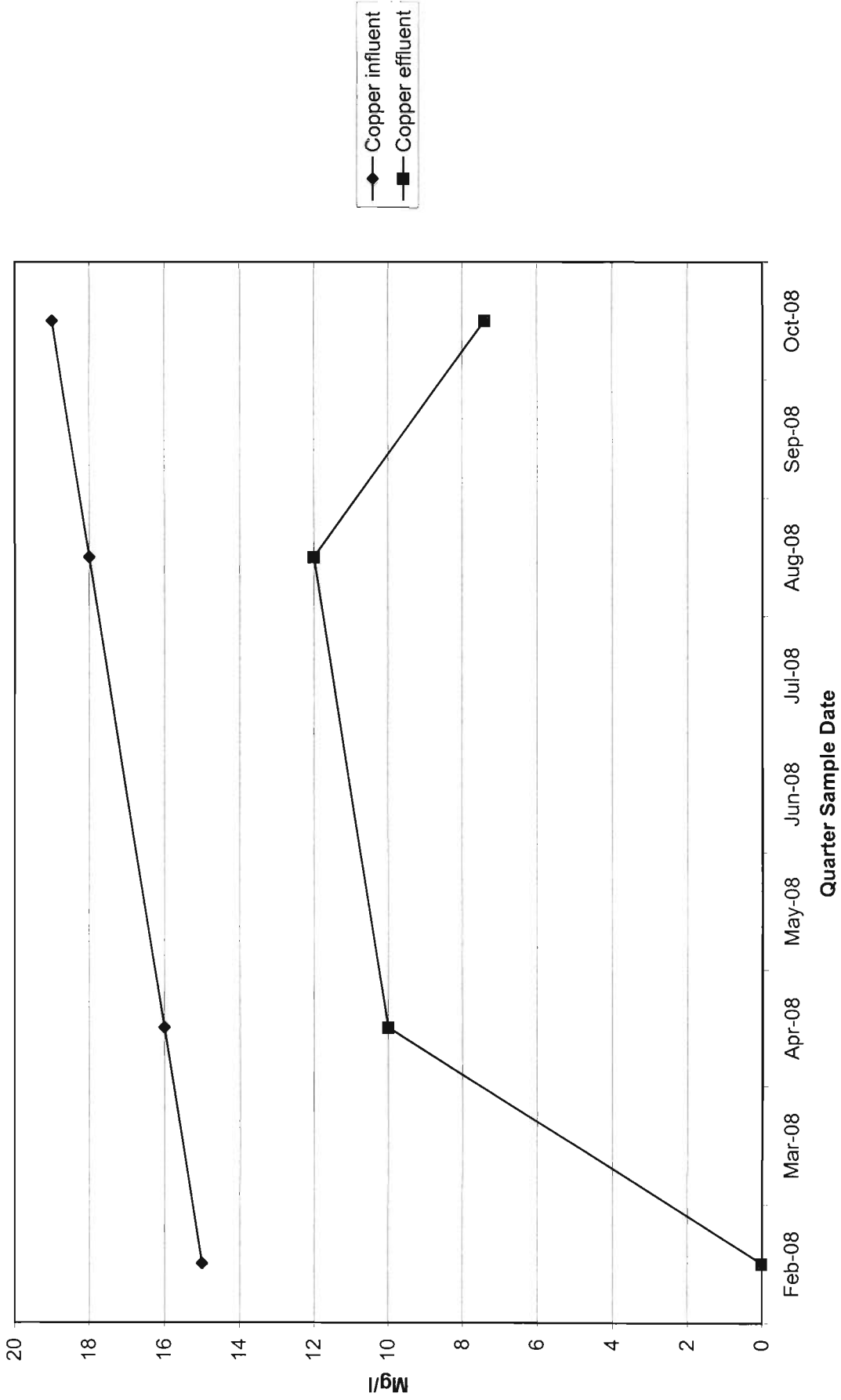
ANTIMONY



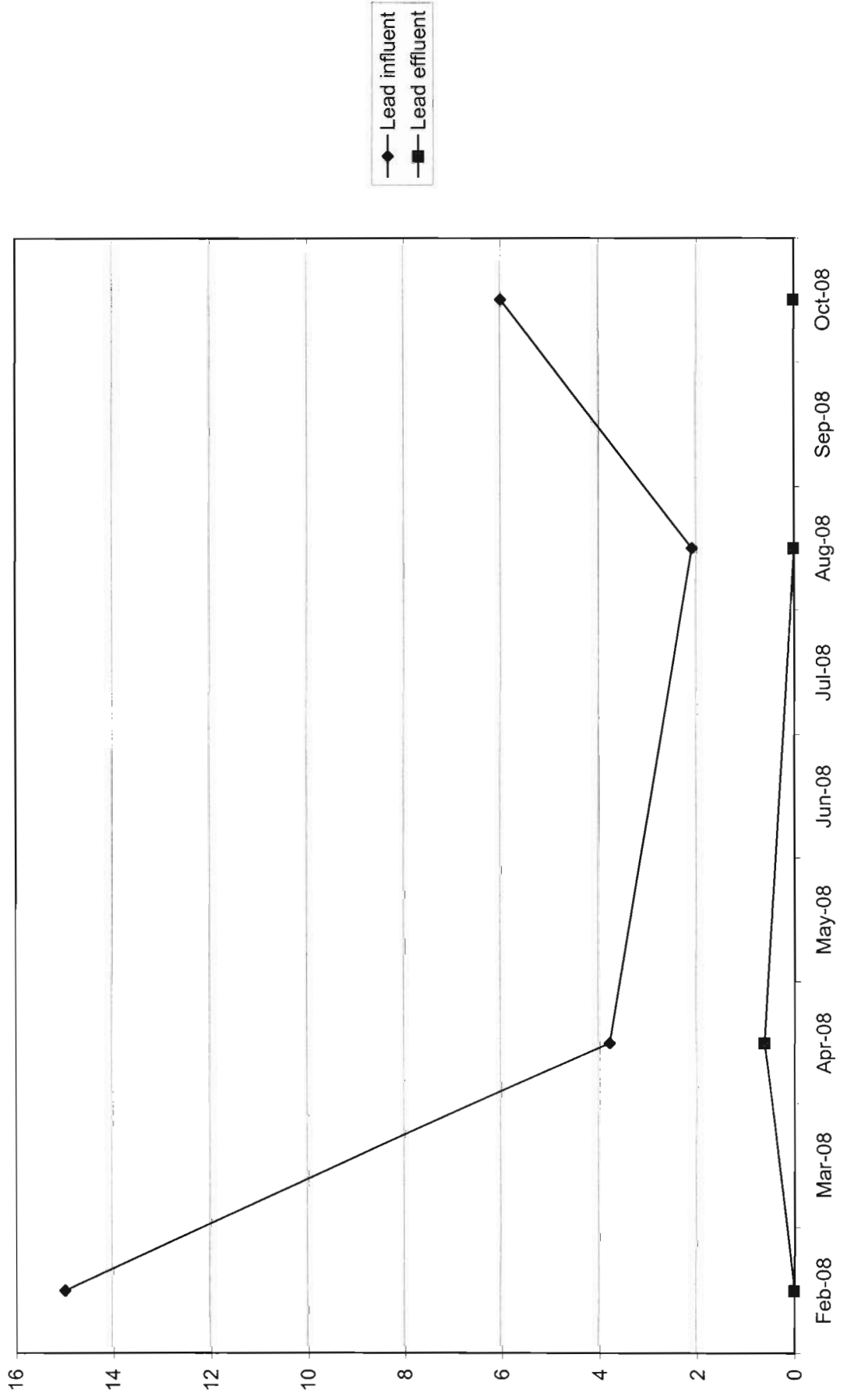
CADMIUM



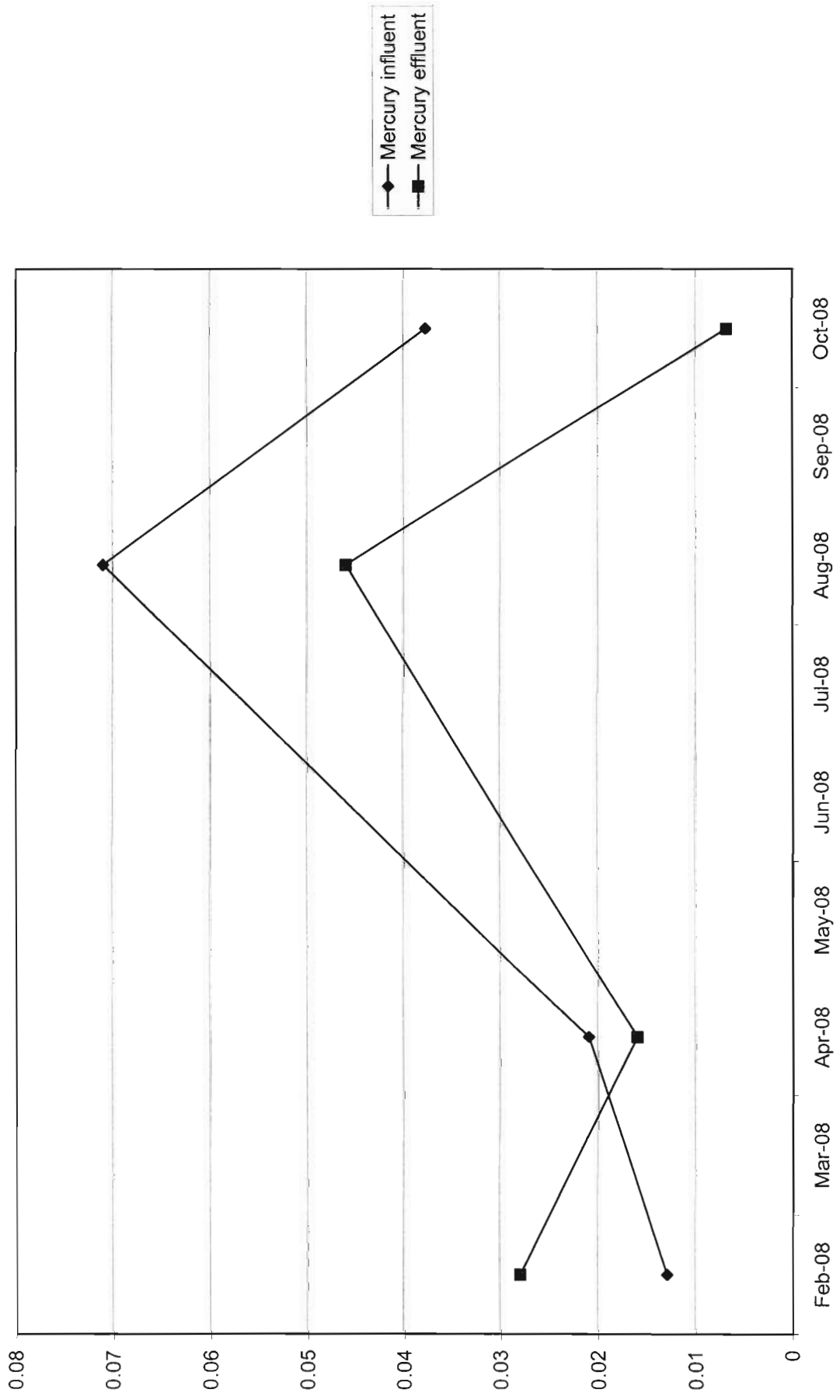
COPPER



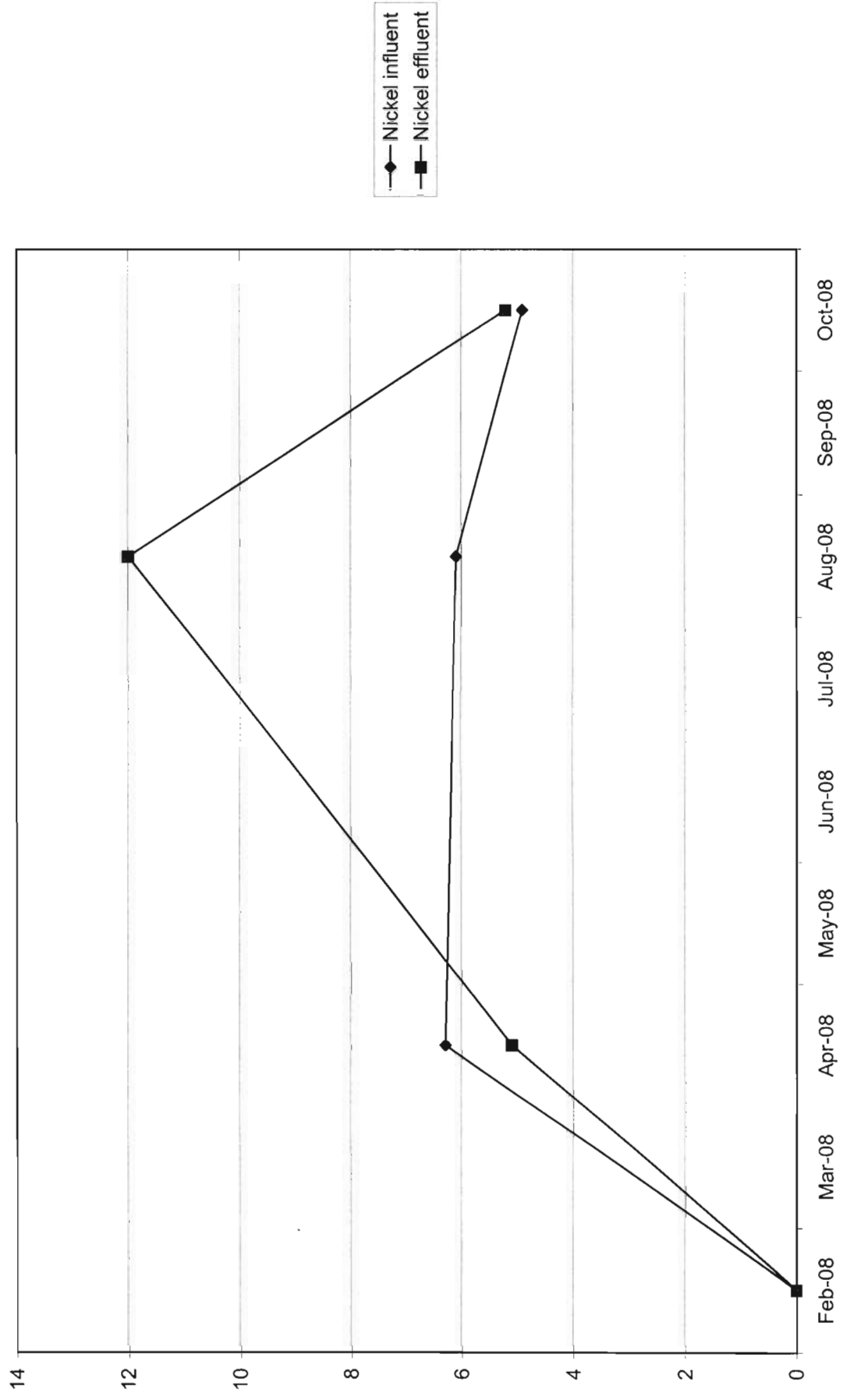
LEAD



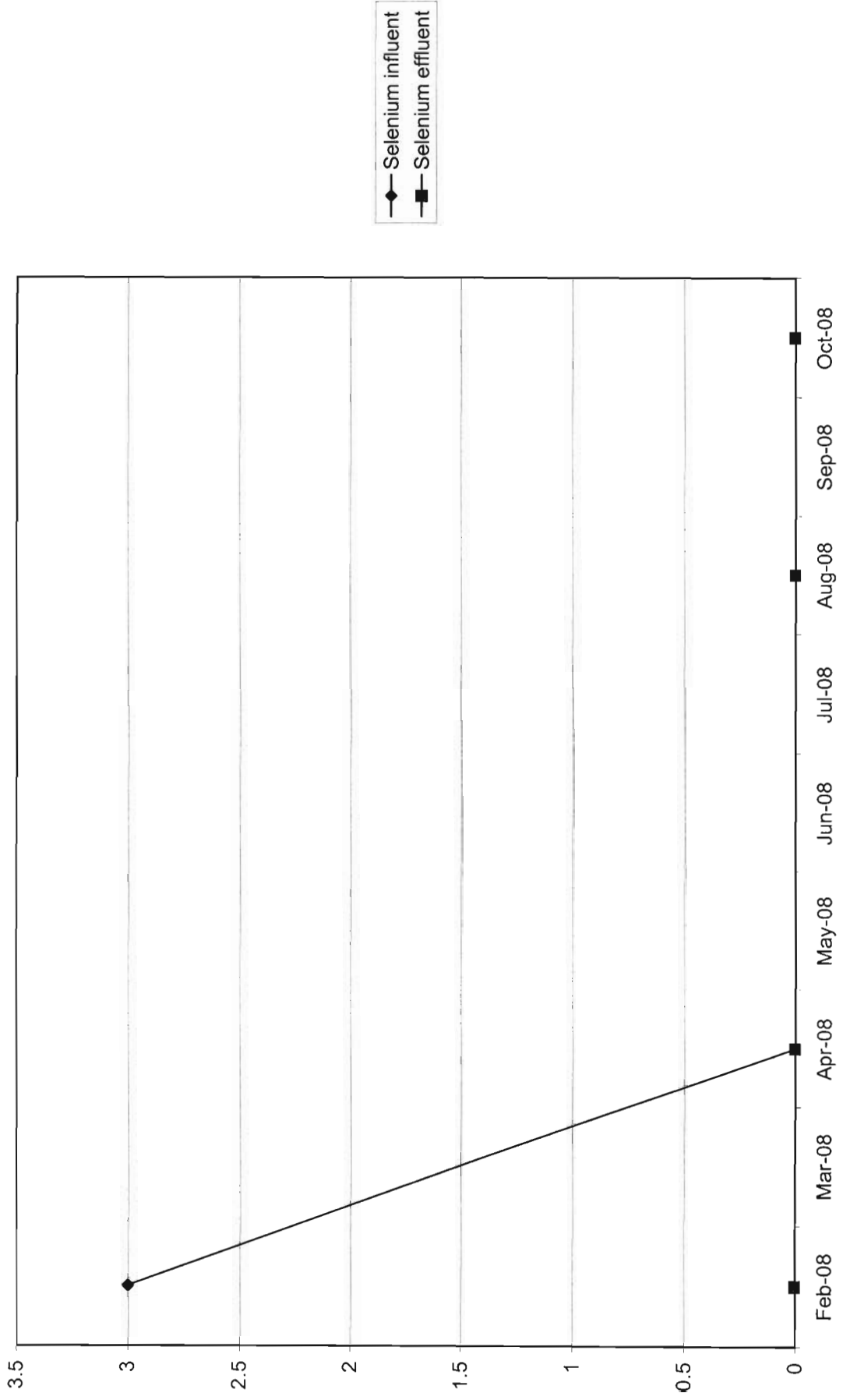
MERCURY



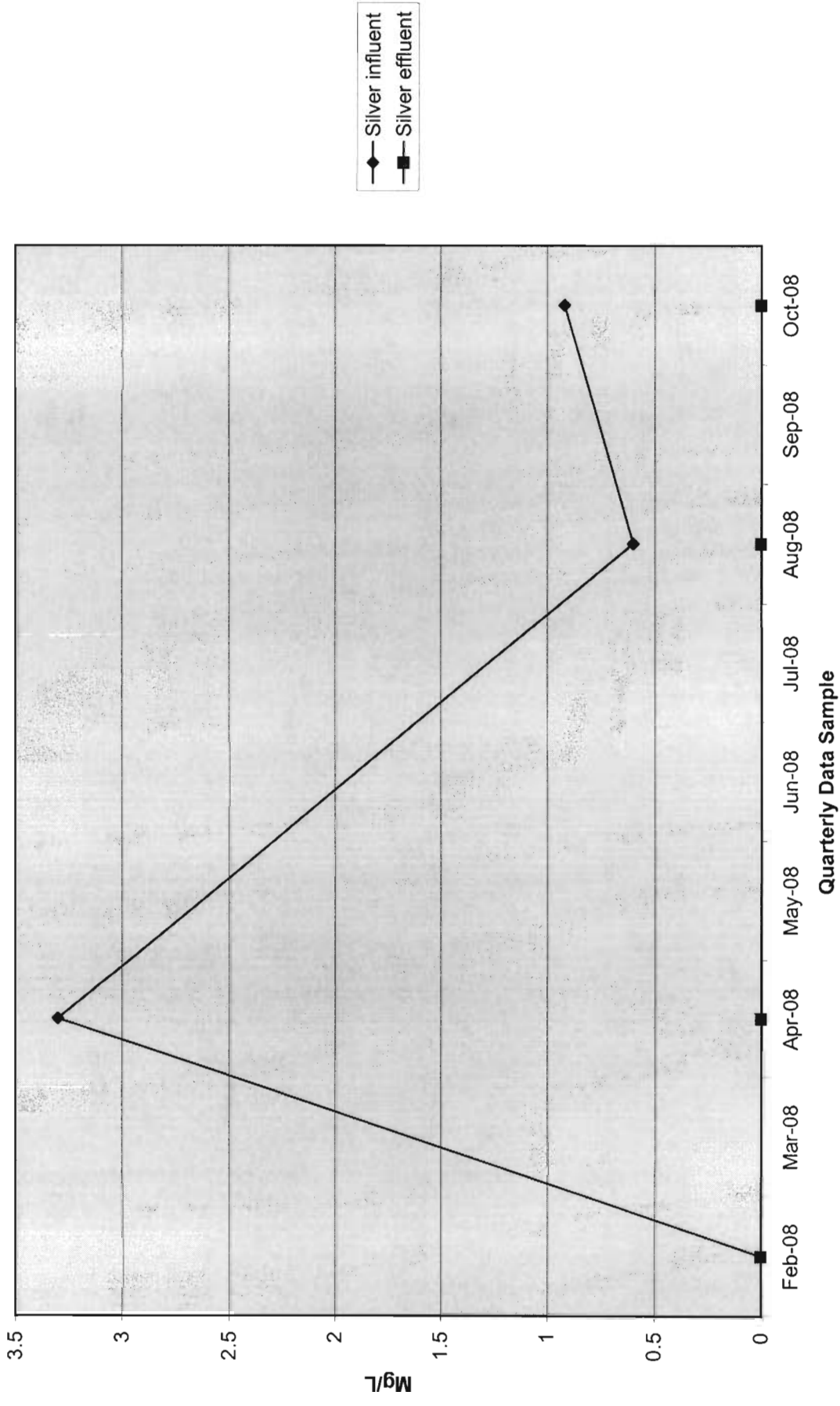
NICKEL



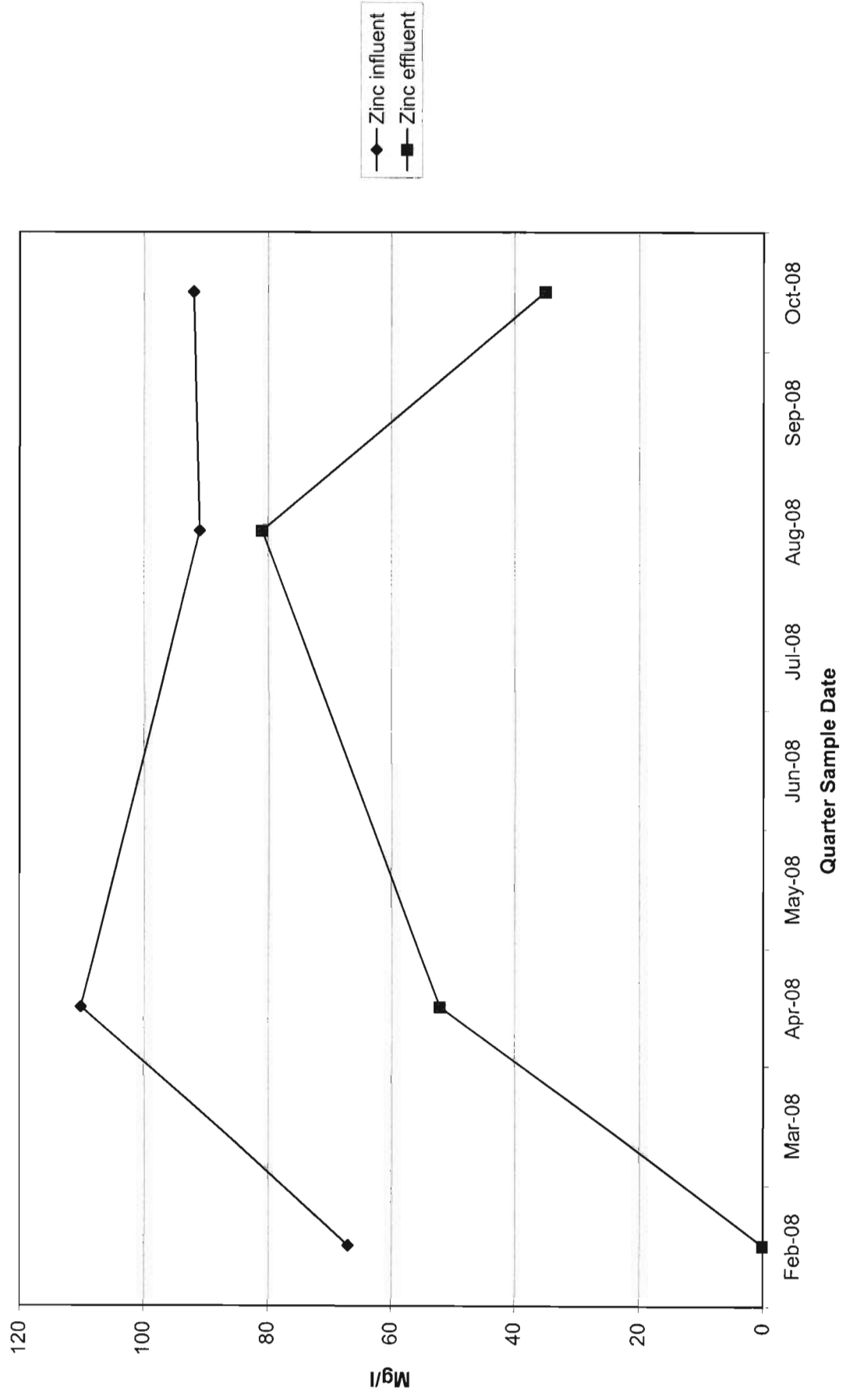
SELENIUM



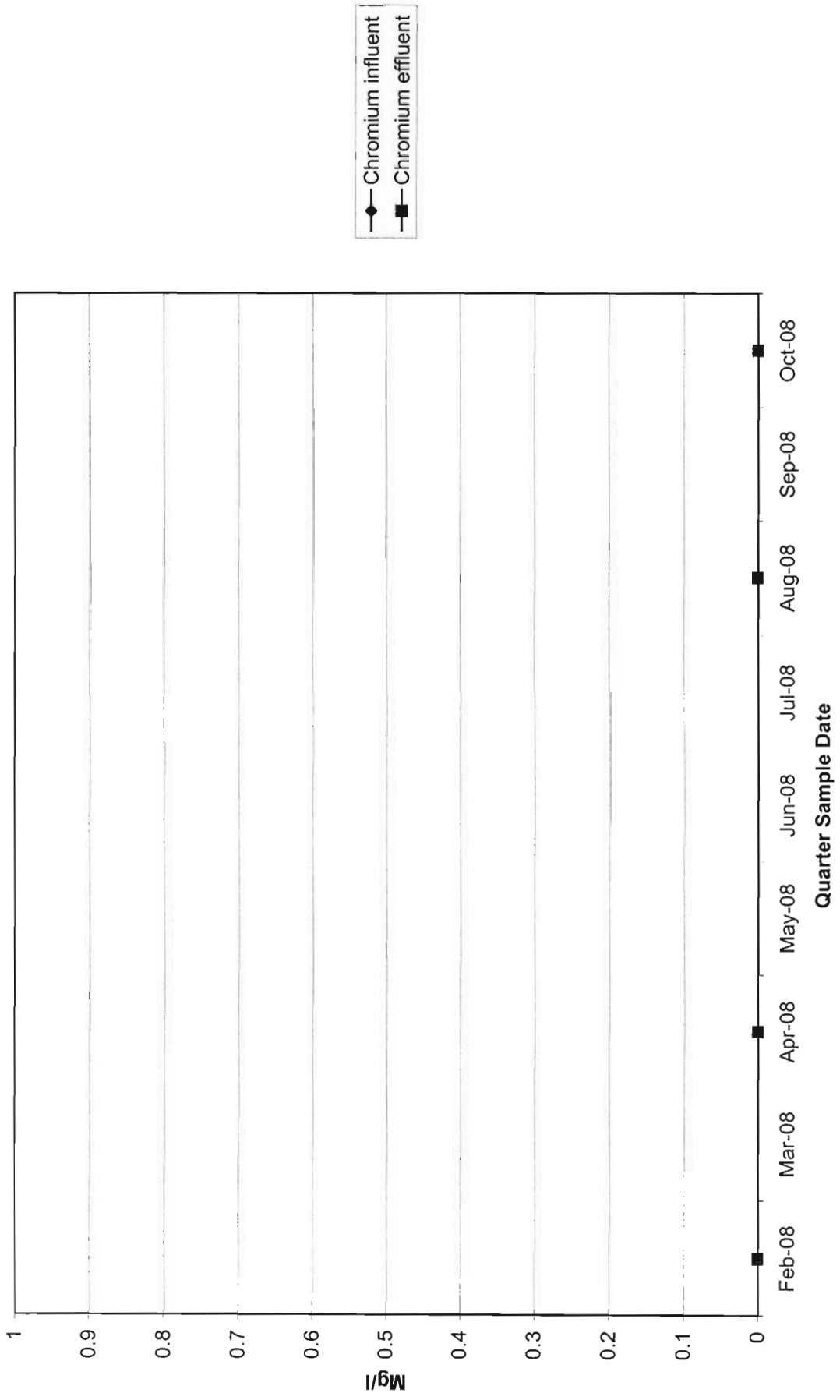
SILVER



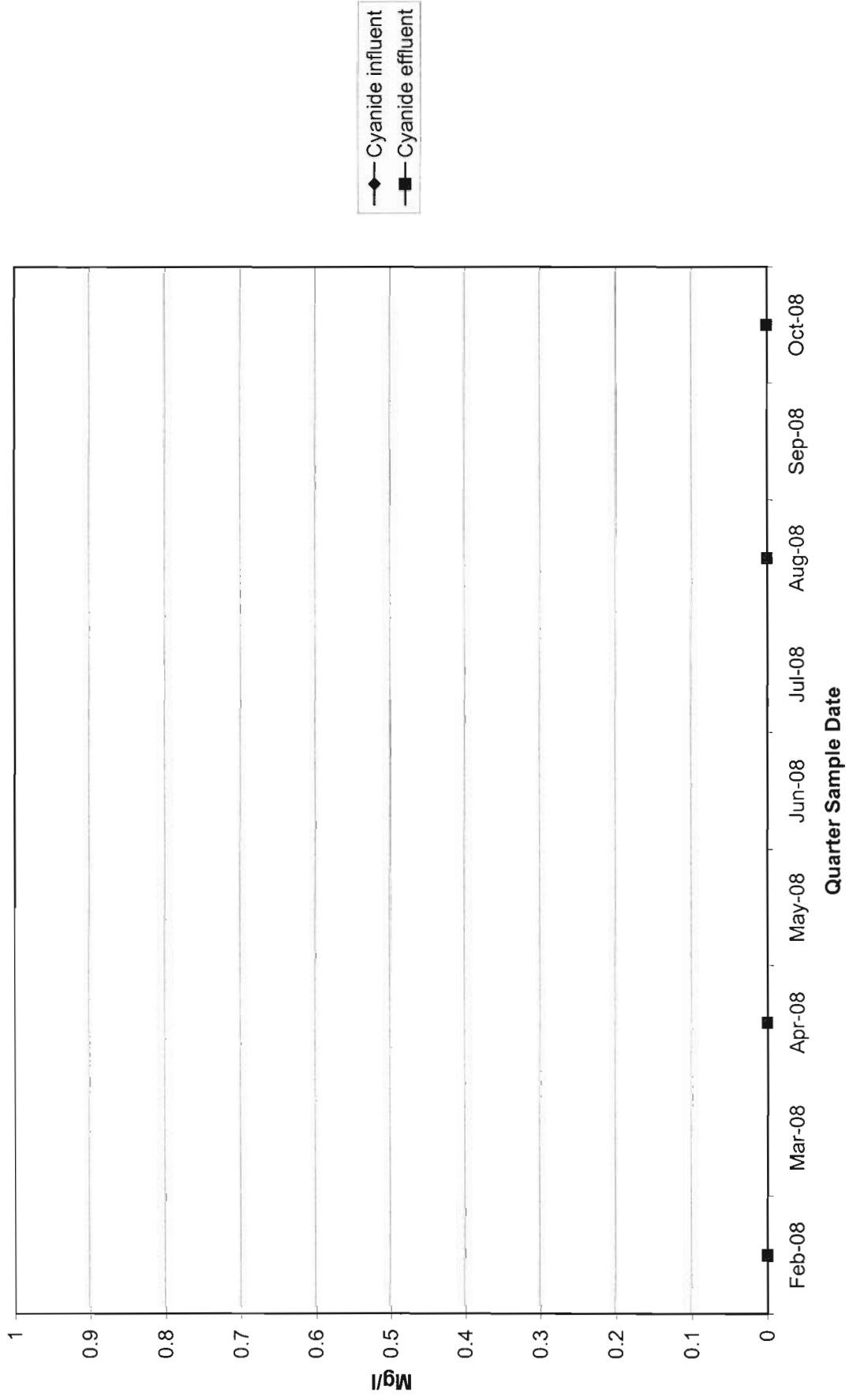
ZINC



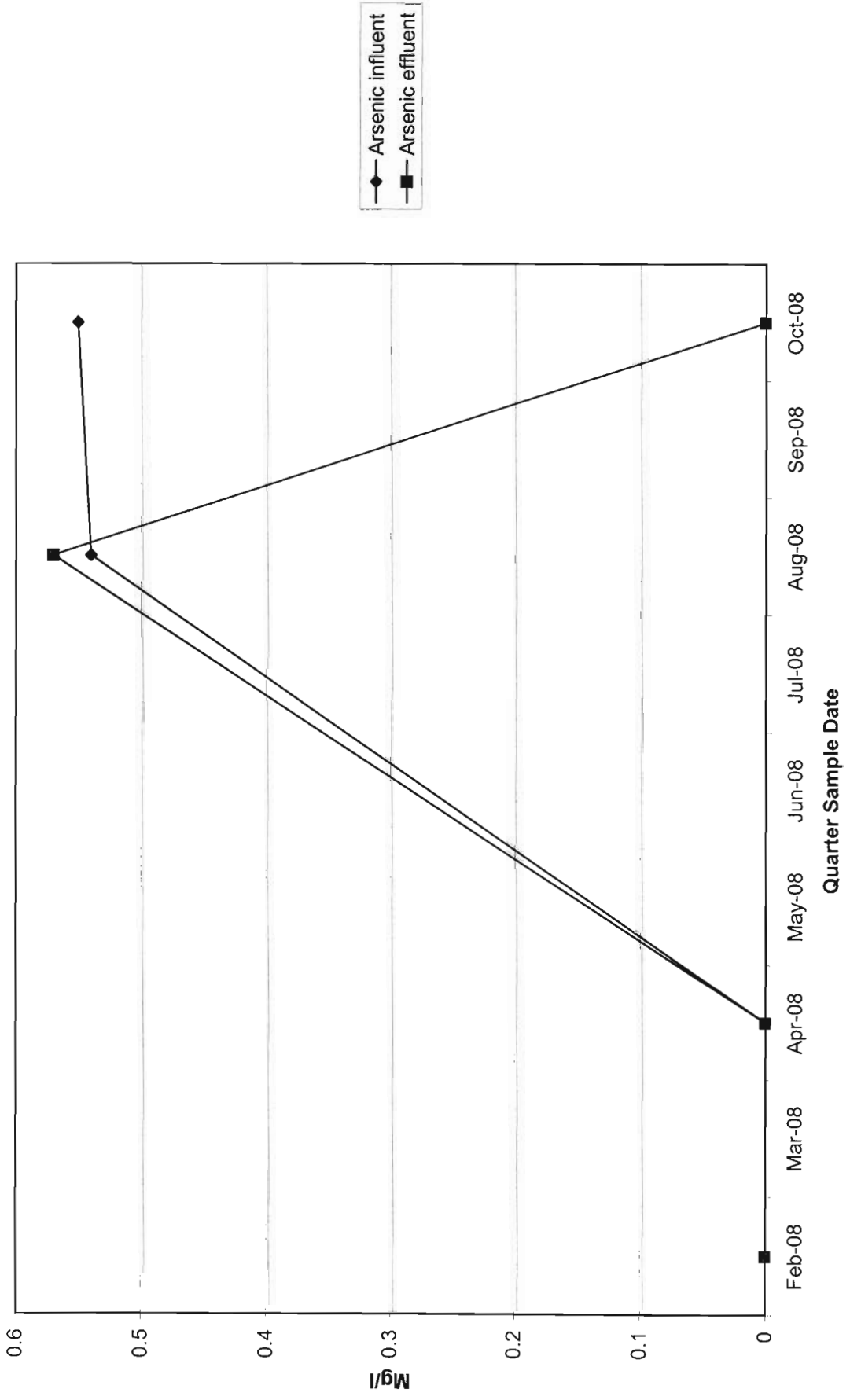
CHROMIUM



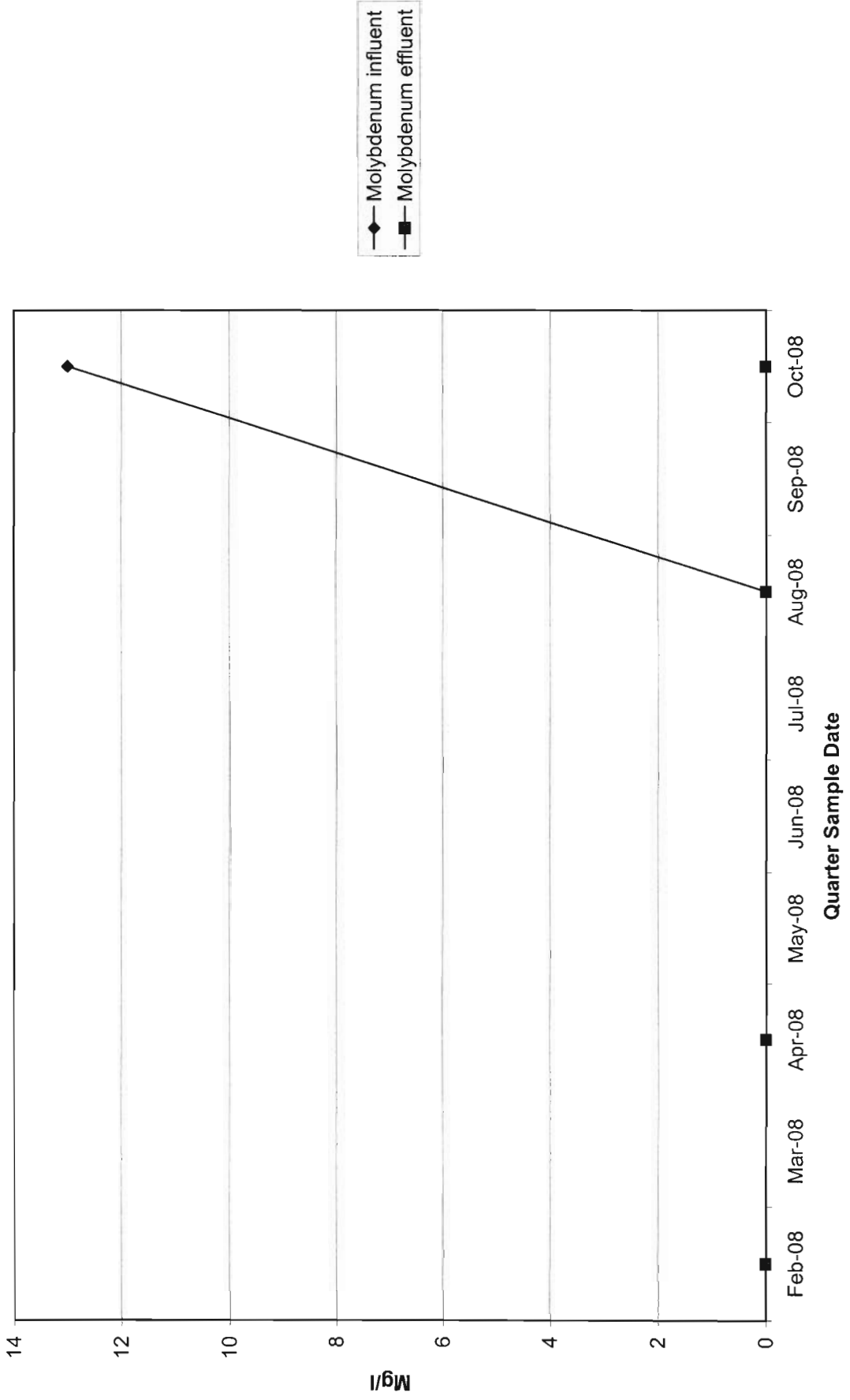
CYANIDE



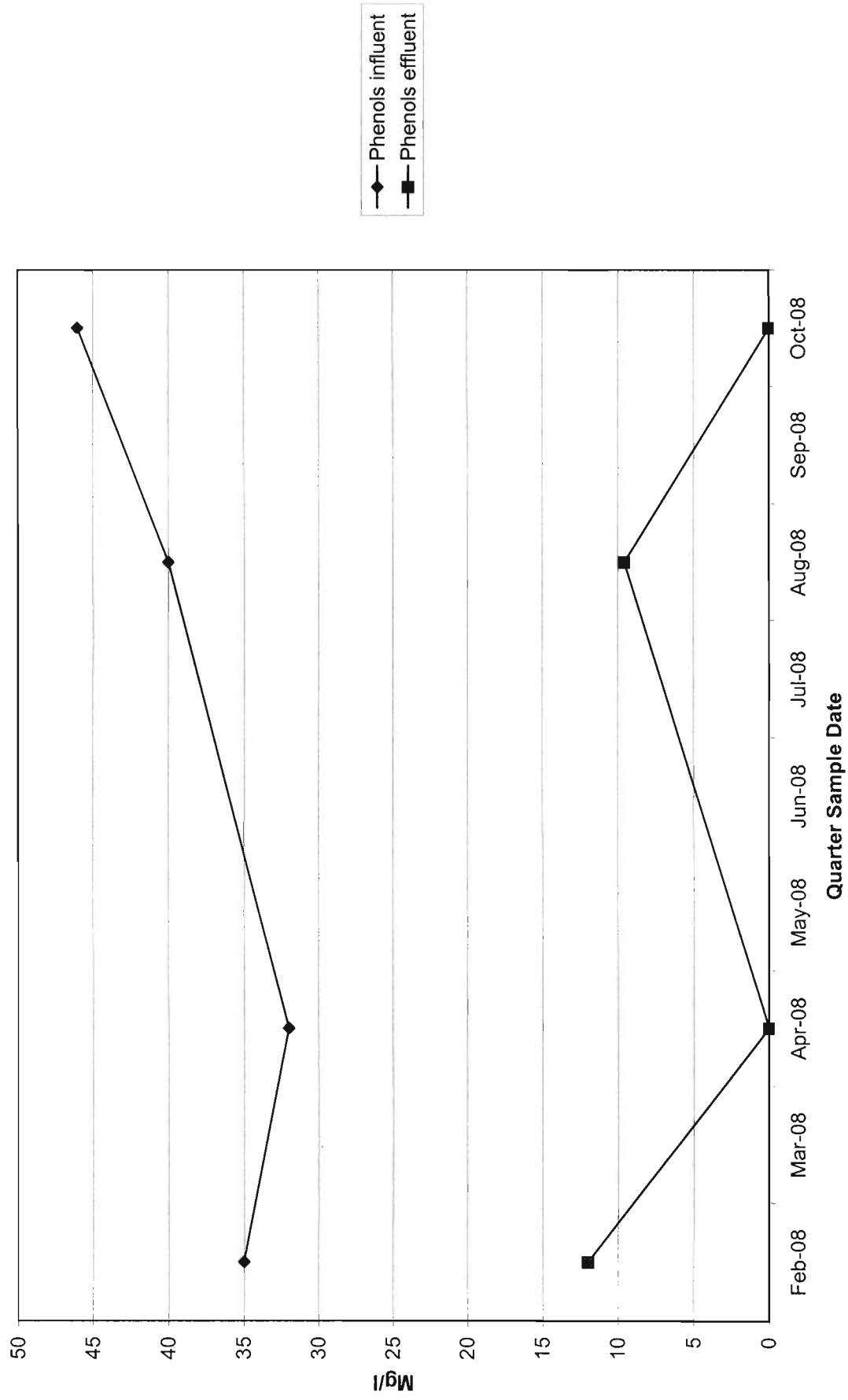
ARSENIC



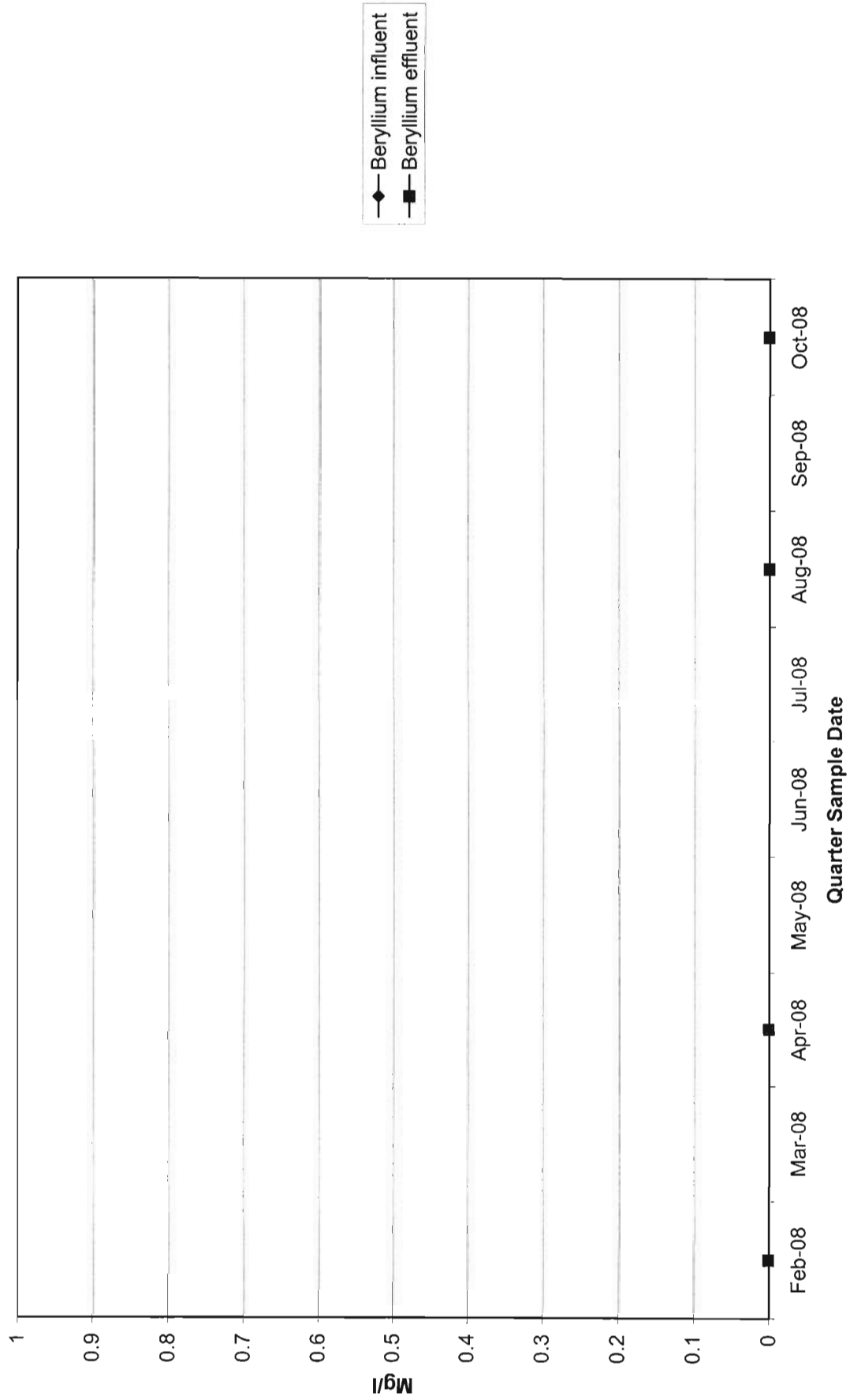
MOLYBDENUM



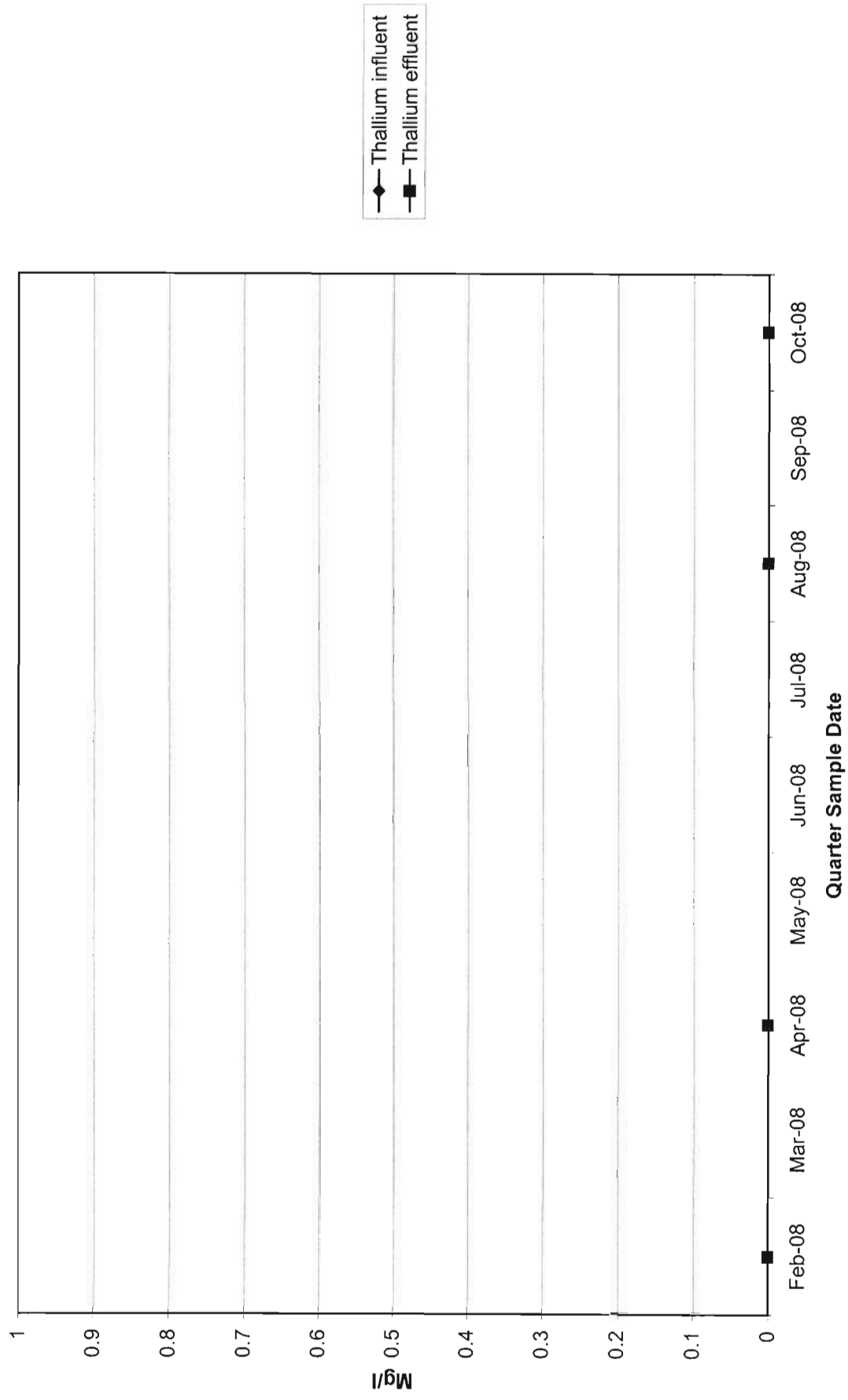
PHENOLS



BERYLLIUM




THALLIUM



PPS Program Report

* NPDES ID: AR0022181 Permittee's Name Clarksville


* Report Received/Event Date: 2/17/09  Date 4/2/09

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

Report Information

* Pretreatment Performance Summary Start Date: 1/1/08 

Significant Industrial Users (SIUs)

SIUs: 4

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: 1

Violation Notices Issued to SIUs: 6

Administrative Orders Issued to SIUs: 1

Civil Suits Filed Against SIUs: 0

Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

CIUs: 2

CIUs in SNC: 0


Penalties

Dollar Amount of Penalties Collected: \$ 0

Industrial Users (IUs) from which Penalties have been collected: 0

Other Information

SUO Reference: _____

SUO Date: _____ 

Annual Pretreatment Budget: \$ _____

Pass-Through/Interference Indicator:

Notification of IU Schedule for Remedial Measures: No

Timely 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: _____

Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval: _____

Removal Credits: _____

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: _____