

## Peltier, Hannah

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**From:** Gilliam, Allen  
**Sent:** Thursday, January 22, 2015 11:10 AM  
**To:** clarksville pam smith  
**Cc:** Fuller, Kim; Peltier, Hannah; Kaelin, Cynthia; Ramsey, David; Bolenbaugh, Michelle  
**Subject:** AR0022187\_Clarksville Feb 2015 annual Pretreatment report with ADEQ reply\_20150122  
**Attachments:** Annual Pretreatment Report Scaned 2015.pdf

Pam,

Clarksville Light & Water Company's February annual Pretreatment report was received (early), reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i). No further actions are deemed necessary at this time.

Notes: Contact with Mr. Rainey on 1/22/15 confirmed the certified lab analysis showed the 1/29/14 influent concentration for Cu was 8.3 ug/l, not 803 ug/l. Please be more careful in transferring lab data to the inf/eff chart.

Also the four (4) effluent samples for Hg met the reasonable potential for exceeding the WQ criteria which may produce a Hg limit in the City's next NPDES permit. Method 1631E is the preferred analytical method (higher probability of matrix interferences and false positives with Method 245.7) and clean sampling techniques should be followed to the "t" to ensure not contaminating the Hg samples to begin with.

Thank you for your timely report remaining in compliance with the Federal Pretreatment requirements in 40 CFR 403.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

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**From:** Pam Smith [<mailto:pam.smith@clarksvillelightwater.com>]  
**Sent:** Wednesday, January 21, 2015 11:51 AM  
**To:** Gilliam, Allen  
**Subject:** Clarksville Feb 2015 annual Pretreatment report

Ok here it is again.

Pam Smith



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

January 16, 2015

Mr. Gilliam

RE: Annual Report

Dear Mr. Gilliam

Please find enclosed our 9th annual list – violator's industrial users as required by our permit. Please note the violations on attachment A. I have included our MAHL as required. If you have any questions please feel free to give us a call 479-754-7929.

Sincerely

Gregg Rainey  
Superintendent

Pam Smith  
Pretreatment Coordinator



(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for the effluent (not required but, SHOULD also be met for the influent) so the data can also be used for future Local Limits re-evaluation/assessments and NPDES application purposes.**

(2) The value MAHC (= MAHL / 8.34 X Avg. POTW flow in MGD) was calculated during the development of TBLL based on State WQ criteria, EPA guidance and ADEQ Pretreatment staff Excel spreadsheets.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity at which they were detected.

MAHC - Maximum Allowable Headworks Concentration

WQ - "Water Quality Levels not to be exceeded" OR actual permit limit.





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

Address P.O. Box 1807

City Clarksville State/Zip AR 72830

Contact Person Pam Smith Position Pretreatment Coordinator

Contact Telephone 479-754-7929 NPDES Permit No. AR0022187

Reporting Period 1-1-14 12-31-14  
 (Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 1

Total Number of Significant Noncategorical IUs 2

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

II. Significant Industrial User Compliance

	<u>SIGNIFICANT INDUSTRIAL USERS</u> <u>Categorical</u>	<u>NonCategorical</u>
1) No. of SIUs Submitting BMRs/Total No. Required. . . . .	<u>0/0</u>	<u>N/A*</u>
2) No. of SIUs Submitting 90-Day Compliance Reports/No. Required. . . . .	<u>0/0</u>	<u>N/A*</u>
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required. . . . .	<u>1/1</u>	<u>2/2</u>
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule . . . .	<u>0/0</u>	<u>0/0</u>
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs . . . . .	<u>0/0</u>	<u>0/0</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) No. of Control Documents Issued/Total No. Required. . . . .	<u>1/1</u>	<u>2 / 2</u>
2) No. of Nonsampling Inspections Conducted. . . . .	<u>1</u>	<u>2</u>
3) No. of Sampling Visits Conducted. . . . .	<u>2</u>	<u>4</u>
4) No. of Facilities Inspected (nonsampling) . . . . .	<u>0</u>	<u>0</u>
5) No. of Facilities Sampled . . . . .	<u>1</u>	<u>2</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Compliance Schedules Issued/No. of Schedules Required . . . . .	<u>0/0</u>	<u>0/0</u>
2) No. of Notices of Violations Issued to SIUs	<u>1</u>	<u>4</u>
3) No. of Administrative Orders Issued to SIUs	<u>0</u>	<u>0</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.

*Gregg Ray*  
 Authorized Representative Date 1-16-2015