

From: [Yates, Adam](#)
To: [PCF](#)
Cc: [Burrow, Kealey](#); [McWilliams, Carrie](#); [Healey, Richard](#); [Gray, Gavin](#)
Subject: RE: Annual Pretreatment Report
Date: Tuesday, March 06, 2018 4:17:15 PM
Attachments: [AR0022187 Clarksville Feb 2018 Pretreatment Program Annual Report 20180214.pdf](#)

Pam,

Clarksville Light & Water's February 2018 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 CFR 403.12(i). Thank you for your timely submittal. If you have any questions or concerns, please feel free to contact me.

Kindly,

Adam Yates
State Pretreatment Coordinator
Office of Water Quality
Arkansas Department of Environmental Quality
Phone: (501) 682-0617
Fax: (501) 682-0880

G:\Shared Folders\Water\Pretreatment\Reports

From: PCF [mailto:PCF@clarksvillelightwater.com]
Sent: Wednesday, February 14, 2018 11:55 AM
To: Yates, Adam
Subject: Annual Pretreatment Report

Dear Adam
Please let me know if you receive this ok.
Thanks Pam
Pretreatment Coordinator



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

February 14, 2018

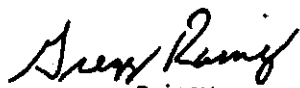
Mr. Yates


RE: Annual Report

Dear Mr. Yates

Please find enclosed our 11th 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 479-754-6241 ext 304.

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

Address P.O. Box 1807

City Clarksville State/Zip AR 72830

Contact Person Pam Smith Position Pre-treatment Coordinator
479 Ext. 304

Contact Telephone 754-6241 NPDES Permit Nos. AR0022187

Reporting Period January 1, 2017 December 31, 2017
(Beginning Month, day and Year) (Ending Month, day 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>1/1</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>1/1</u>
5) No. of SIUs in Significant Noncompliance / Total No. of SIUs	<u>0/1</u>	<u>1/2</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>33.90 or 1 SIU</u>	

III. Compliance Monitoring Program

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

1) No. of Control Documents Issued / Total No. Required.	<u>1/1</u>	<u>2/2</u>
2) No. of Non-sampling Inspections Conducted / Total No. Required.	<u>1</u>	<u>2</u>
3) No. of Sampling Visits Conducted / Total No. Required.	<u>2/1</u>	<u>4/2</u>
4) No. of Facilities Inspected (nonsampling) / Total No. Required.	<u>0</u>	<u>0</u>
5) No. of Facilities Sampled / Total No. Required.	<u>1/1</u>	<u>2/2</u>

IV. Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

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>0</u>	<u>8</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>1</u>
7) Amount of Penalties (not surcharges) Collected (total dollars/IUs assessed)	<u>0</u>	<u>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 2-14-2018

ATTACHMENT A
 PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	SIC/NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (N/A, C, NC, or SNC)				Permit Limits (denote parameter violated & number of times)
			Y/N	Last Action				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	
Greenville Tub	3356/3317 33149/ 331210	433.17	Y	2-1-14	N	1	2	N/A	N/A	C	C	0
Hanesbrand	2251 313310	403	Y	9-1-16	N	1	2	N/A	N/A	C	C	0
Bright Harvest	2037 311411	403	Y	6-1-13	N	1	2	N/A	W/C	C	W/C	BOD 7 PH 4

Include NAICS code(s)
 3rd column - include the CFR # only if the Category has Pretreatment Standards (numeric or narrative)
 Please footnote N/A reason

Legal Notice

In reference with Federal Regulations CFR 40 403.8 (f) (2) (VII) and Legal Authority, City Ordinance #10.04.13 (A), when an industry is in significant noncompliance it must be published in the newspaper.

Bright Harvest is in significant non-compliance with the Publicly Owned Treatment Works. Bright Harvest has agreed and it is planning to take aggressive steps in the near future to correct this issue and return to compliance under their permit.

John Lester, General Manager, Clarksville Light & Water Company.

Published February 7, 2018

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT
 REPORTING YEAR: Jan-17 Dec-17
 TREATMENT PLANT: CITY OF CLARKSVILLE NPDES PERMIT #AR0022187
 AVERAGE POTW FLOW: 13.11 % IU FLOW

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 (See Attachment PPS)	
		3/2/2017	4/25/2017	9/12/2017	10/31/2017		3/3/2017	4/27/2017	6/14/2017	9/13/2017	11/2/2017	EPA Method Used	Detection Level Achieved (ug/l)
Antimony	N/A	0	0	0	0	N/A	0	0		0	0	200.8	60
Cadmium	5.35	0	0	0	0	5.29	0	0		0	0	200.8	0.5
Copper	134	19	5.8	20	32	45.75	7.4	8.8		9.2	5.5	200.8	0.5
Lead	55.3	1.7	0.55	1	0.84	20.04	0	0		0	0	200.8	0.5
Mercury	0.27	0.0087	0.014	0	0	0.013	0.0036	0.023	0.0069	0.008	0.0038	1631E	0.005
Nickel	49.2	5.7	3.3	3.9	5.5	514	3.7	2.9		4.9	3.4	200.8	0.5
Selenium	8.43	0	0	0	0	5.58	0	0		0	0	200.8	5
Silver	36.1	0	0	0	0	14.44	0	0		0	0	200.8	0.5
Zinc	500	99	28	180	79	444	38	30		50	23	200.8	20
Chromium	154	12	0	37	22	1192	0	0		0	0	200.8	10
Cyanide	18.7	0	0	0	0	5.8	0	0		0	0	SM4500	10
Arsenic	5.45	1.8	1.6	2.1	1.4	411.00000	0.72	1.2		1.3	0.65	200.8	0.5
Molybdenum	8.1	0	0	0	0	N/A	0	0		0	0	200.8	8
Phenols	N/A	12	36	23	0	N/A	0	0.024		0	0	420.1	5
Beryllium	11.8	0	0	0	0	5.91000	0	0		0	0	200.8	0.5
Thallium	N/A	0	0	0	0	N/A	0	0		0	0	200.8	0.5
Flow, MGD	N/A	0.761	0.998	1.077	1.09	N/A	0.856	1.7	1.258	1.31	1.557		