

**Torrence, Rufus**

**From:** Torrence, Rufus  
**Sent:** Tuesday, January 12, 2010 8:12 AM  
**To:** 'Myra Taylor'  
**Subject:** AR0037907 AR0043401 AFIN 16-00152 Jonesboro CWL 2008 Annual Pretreatment Report

**ADEQ**

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

January 12, 2010

Myra Taylor, Pretreatment Coordinator  
City Water & Light  
P O Box 1289  
Jonesboro, Arkansas 72403

Re: City Water & Light 2008 Annual Pretreatment Report  
(Permit No. AR0037907, AR0043401 AFIN 16-00152)

Dear Ms. Taylor:

The Department has reviewed the City's 2008 Annual Pretreatment Report and the report is complete.

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](mailto:torrence@adeq.state.ar.us).

Sincerely,

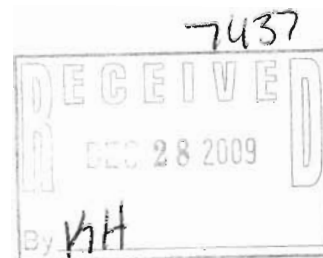


Rufus Torrence, Pretreatment Engineer  
Water Division

01-12-2010

Eff/Inf logged  
ICIS coded  
IV's checked  
ANRTIO updated  
RF

RT



**City Water & Light**  
400 E. Monroe Avenue  
PO Box 1289  
Jonesboro, Arkansas 72403-1289

**2008/2009  
Pretreatment Program  
Status Report**

**NPDES #AR0043401  
NPDES #AR0037907**

Monitoring Results For The Annual Pretreatment Report  
 Reporting Year: October 1, 2008 To September 30, 2009  
 Treatment Plant: City Water & Light Westside NPDES Permit # AR00037907  
 Average Flow : 1.1714 MGD % IU Flow 14.223%

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		EPA MQL (ug/L)	EPA Method used	Detection Level Achieved MQL (ug/L)	
		12/10/2008	2/25/2009	4/29/2009	7/22/2009	12/11/2008	2/26/2009		4/30/2009	7/23/2009						
Antimony	N/A	0	0	0	0	0	N/A	0	0	0	0	0	0	60.0	200.8	1.0
Cadmium	13.0	0.155	0.323	0.172	0.176	0.176	3.99	0	0	0	0	0	0	0.5	200.8	0.1
Copper	114.0	25.2	27.9	18.6	29.8	29.8	29.475	10.2	9.09	7.62	8.04	8.04	0.5	200.8	0.5	
Lead	65.0	3.4	2.98	5.65	6.15	6.15	11.7	0.778	0.798	1.05	0	0	0.5	200.8	0.5	
Mercury	0.026	0.1537	0.0345	0.0936	0.0815	0.0815	0.013	0.0091	0.0067	0.0085	0.00769	0.00769	0.005	1631E	0.0005	
Nickel	250.0	5.56	4.40	4.35	5.51	5.51	322.655	3.84	3.12	3.08	3.11	3.11	0.5	200.8	0.5	
Selenium	12.0	2.0	2.34	0	0	0	5.58	0	0	0	0	0	5.0	200.8	2.0	
Silver	35.0	0.258	0.193	0	0.257	0	6.905	0	0	0	0	0	0.5	200.8	0.1	
Zinc	323.0	82.9	83.5	78.3	78.0	78.0	281.872	38.3	26.3	16.5	17.7	17.7	20.0	200.8	5.0	
Chromium	1000.0	1.66	1.33	1.25	5.99	5.99	816.848	0	0	0	4.11	4.11	10.0	200.8	1.0	
Cyanide	14.0	0	0	0	0	0	5.803	0	0	0	0	0	10.0	4500CNE	10.0	
Arsenic	39.0	4.38	3.81	3.60	5.58	5.58	N/A	3.53	3.35	3.29	4.81	4.81	0.5	200.8	0.5	
Molybdenum	83.0	3.34	4.22	3.93	4.95	4.95	N/A	2.88	2.83	3.76	4.19	4.19	---	200.8	1.0	
Phenols	4000.0	0	0	0	0	0	N/A	0	0	0	0	0	5.0	420.1	5.0	
Beryllium	N/A	0	0	0	0	0	N/A	0	0	0	0	0	0.5	200.8	0.5	
Thallium	N/A	0	0	0	0	0	N/A	0	0	0	0	0	0.5	200.8	0.5	
Flow, MGD	N/A	1.2354	1.2270	2.7603	1.6636	1.6636	N/A	1.1029	1.5935	4.2810	1.3752	1.3752	---	---	---	
Chloroform	N/A	2.48	3.48	N/A	N/A	N/A	N/A	1.32	1.32	N/A	N/A	N/A	10.0	624	1.0	
1,4-Dichlorobenzene	N/A	24.6	31.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.0	624	1.0	
alpha-Terpineol	N/A	31.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.0	625	1.0	
Bis(2-ethylhexyl)phthalate	N/A	0.0107	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.010	608	0.00400	
Heptachlor epoxide	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.010	608	0.00400	
gamma-BHC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.05	608	0.00400	
Endrin aldehyde	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.10	608	0.00400	
Endrin Ketone	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.10	608	0.00400	
Mercury Sample Dates		12/2/2008	3/3/2009	6/2/2009	9/9/2009	12/3/2008		3/4/2009	6/3/2009	9/10/2009						

Monitoring Results For The Annual Pretreatment Report  
 Reporting Year: October 1, 2008 To September 30, 2009  
 Treatment Plant: City Water & Light Eastside NPDES Permit # AR0043401  
 Average Flow : 7.3883 MGD % IU Flow 21.27%

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)			
		12/9/2008	2/24/2009	4/28/2009	7/21/2009		12/11/2008	2/26/2009	4/30/2009	7/23/2009						
Antimony	N/A	0	0	0	0	0	0	0	0	0	0	60.0	200.8	200.8	1.0	
Cadmium	12.0	0.277	0.196	0.135	0.184	3.99	0	0	0	0	0	0.5	200.8	200.8	0.1	
Copper	88.0	33.3	27.0	14.9	29.4	29.475	4.74	2.76	3.85	4.23	4.74	0.5	200.8	200.8	0.5	
Lead	30.0	3.31	1.17	2.08	3.57	11.7	9.68	0	0	0.507	9.68	0.5	200.8	200.8	0.5	
Mercury	0.059	0.1698	0.150	0.1897	0.104	0.013	0.0029	0.0039	0.00164	0.00329	0.0029	0.005	1631E	1631E	0.0005	
Nickel	140.0	4.55	3.43	3.45	4.06	322.655	1.67	1.83	1.48	2.36	1.67	0.5	200.8	200.8	0.5	
Selenium	12.0	0	0	0	0	5.58	0	0	0	0	0	5.0	200.8	200.8	2.0	
Silver	66.0	3.42	3.11	0.674	1.40	6.905	0	0	0	0	0	0.5	200.8	200.8	0.1	
Zinc	407.0	125	99.9	66.3	103	281.872	48.9	28.7	28.4	50.2	48.9	20.0	200.8	200.8	5.0	
Chromium	250.0	2.19	0	1.41	5.21	816.848	0	0	3.30	0	0	10.0	200.8	200.8	1.0	
Cyanide	19.0	0	0	0	0	5.803	0	0	0	0	0	10.0	4500CNE	4500CNE	10.0	
Arsenic	23.0	2.24	0.831	2.46	3.43	N/A	0.807	1.19	1.50	0.807	1.19	0.5	200.8	200.8	0.5	
Molybdenum	77.0	8.61	10.0	4.57	6.71	N/A	9.14	6.18	8.55	9.14	6.18	---	200.8	200.8	1.0	
Phenols	4000.0	0	0.005	0	0	N/A	0	0	0	0	0	5.0	420.1	420.1	5.0	
Beryllium	N/A	0	0	0	0	N/A	0	0	0	0	0	0.5	200.8	200.8	0.5	
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0	0.5	200.8	200.8	0.5	
Flow, MGD	N/A	9.5827	6.962	20.4059	16.19427	N/A	6.1187	7.1590	14.3007	6.1187	7.1590	---	---	---	---	
Chloroform	N/A		2.81			N/A		5.24				10.0	624	624	1.0	
1,4-dichlorobenzene	N/A		1.83			N/A						10.0	624	624	1.0	
Bis(2-ethylhexyl)phthalate	N/A		11.9			N/A						10.0	625	625	1.0	
alpha-Terpineol	N/A		20.3			N/A						---	---	---	---	
bromodichloromethane	N/A					N/A		2.81				50.0	624	624	1.0	
alpha-BHC	N/A			0.0109								0.050	608	608	0.00400	
delta-BHC	N/A			0.00566								0.050	608	608	0.00400	
Endrin Ketone	N/A			0.0226								0.020	608	608	0.00400	
beta-BHC	N/A											0.050	608	608	0.00400	
Chlorpyrifos	N/A											0.070	608	608	0.00700	
Mercury Sample Dates		12/1/2008	3/2/2009	6/1/2009	9/8/2009		12/3/2008	3/4/2009	6/3/2009	9/10/2009						

**Pretreatment 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				90-Day Compliance	Semi-Annual	Self-Monitoring		
Colson Casters Corp	8402	3429	Metal finishing	Y	10/1/2009	No	1	12	N/A*	N/A*	N/A*	N/A*	C
Delta Cons. Industries	8409	3469	Metal Finishing	Y	7/1/2007	No	1	12	N/A*	N/A*	N/A*	N/A*	C
Hytrol Conveyor	8413	3535	Metal Finishing	Y	7/1/2007	No	1	12	N/A*	N/A*	N/A*	N/A*	C
Farr Company	8702	3499	Metal Finishing	Y	11/1/2007	No	1	12	N/A*	N/A*	N/A*	N/A*	C
Thomas & Betts	9502	3644	Metal Finishing	Y	6/1/2005	No	1	12	N/A*	N/A*	N/A*	N/A*	C
Trinity Lighting	9801	3646	Metal Finishing	Y	6/1/2008	No	1	12	N/A*	N/A*	N/A*	N/A*	C
JK Products & Serv.	10001	3648	Metal Finishing	Y	7/1/2005	No	1	12	N/A*	N/A*	N/A*	N/A*	NC(Zinc)
Action Graphix**	10503	332900	Metal Finishing	Y	6/1/2005	No	1	4	N/A*	N/A*	N/A*	N/A*	C
Riceland Foods	8408	2044	Food Products	Y	9/1/2004	No	1	12	N/A*	N/A*	N/A*	N/A*	C
Quebecor World	8414	2752	Printing	Y	10/1/2009	No	1	12	N/A*	N/A*	N/A*	N/A*	C
International Paper	8901	2653	Paper products	Y	12/1/2005	No	1	12	N/A*	N/A*	N/A*	N/A*	C
Butterball LLC.	9101	2013	Food Products	Y	9/30/2008	No	1	94	N/A*	N/A*	N/A*	N/A*	NC(FOG)
Post Foods	9302	2043	Food Products	Y	8/4/2008	No	1	365	N/A*	N/A*	N/A*	N/A*	C
G & K Services	9701	7218	Auto & Laundries	Y	9/1/2007	No	1	12	N/A*	N/A*	N/A*	N/A*	NC(FOG)
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	5/18/2009	No	1	365	N/A*	N/A*	N/A*	N/A*	NC(FOG)
Alberto Culver	10801	2844	Perfumes,Cosmetics, Etc.	Y	1/28/2008	No	1	61	N/A*	N/A*	N/A*	N/A*	C
Nice-Pak Products	10811	2844	Perfumes,Cosmetics, Etc.	Y	10/15/2009	Yes	1	7	N/A*	N/A*	N/A*	N/A*	C
<b>SUM</b>							<b>18</b>	<b>1393</b>					

\* CWL Performs All Monitoring For This IU.

\*\* Action Graphix ceased operation 02/2009.

Pretreatment 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	
<b>Categorical</b>												
Colson Casters Corp	8402	3429	Metal finishing	Y	10/1/2009	No	1	12	N/A*	N/A*	N/A*	C
Delta Cons. Industries	8409	3469	Metal Finishing	Y	7/1/2007	No	1	12	N/A*	N/A*	N/A*	C
Hyrol Conveyor	8413	3535	Metal Finishing	Y	7/1/2007	No	1	12	N/A*	N/A*	N/A*	C
Farr Company	8702	3499	Metal Finishing	Y	11/1/2007	No	1	12	N/A*	N/A*	N/A*	C
Thomas & Betts	9502	3644	Metal Finishing	Y	6/1/2005	No	1	12	N/A*	N/A*	N/A*	C
Trinity Lighting	9801	3646	Metal Finishing	Y	6/1/2008	No	1	12	N/A*	N/A*	N/A*	C
JFK Products & Services	10001	3648	Metal Finishing	Y	7/1/2005	No	1	12	N/A*	N/A*	N/A*	NC(Zinc)
Action Graphix**	10503	332900	Metal Finishing	Y	6/1/2005	No	1	4	N/A*	N/A*	N/A*	C
SUM							8	88				
<b>Ordinance</b>												
Riceland Foods	8408	2044	Food Products	Y	9/1/2004	No	1	12	N/A*	N/A*	N/A*	C
Quebecor World	8414	2752	Printing	Y	10/1/2009	No	1	12	N/A*	N/A*	N/A*	C
International Paper	8901	8901	Paper products	Y	12/1/2005	No	1	12	N/A*	N/A*	N/A*	C
Butterball LLC.	9101	2013	Food Products	Y	9/30/2008	No	1	94	N/A*	N/A*	N/A*	NC(FOG)
Post Foods	9302	2043	Food Products	Y	8/4/2009	No	1	365	N/A*	N/A*	N/A*	C
G & K Services	9701	7218	Auto & Laundries	Y	9/1/2007	No	1	12	N/A*	N/A*	N/A*	NC(FOG)
Frito-Lay Inc.	9702	2096	Food Products	Y	9/1/2007	No	1	365	N/A*	N/A*	N/A*	C
Nestle Prepared Foods	10205	2099	Food Products	Y	5/18/2009	No	1	365	N/A*	N/A*	N/A*	NC(FOG)
Alberto Culver (1)	10801	2844	Perfumes,Cosmetics, Etc.	Y	1/28/2008	No	1	61	N/A*	N/A*	N/A*	C
Nice-Pak Products (2)	10811	2844	Perfumes,Cosmetics, Etc.	Y	10/15/2009	Yes	1	7	N/A*	N/A*	N/A*	C
SUM							10	1305				

\* CWL Performs All Monitoring For This IU.

\*\* Action Graphix ceased operation 02/2009

① Alberto 2407 Quality Way (870) 910-1100  
 ② Nice-Pak 1 One Nice Park Rd (870) 935-6423

Attachment B

Significant Violations - Enforcement Actions Taken

Industrial User	Nature of Violation		Number of Actions Taken				Penalties Collected	Compliance Schedule		Current Status	Comments	
	Reports	Limits	N.O.V	A.O	Civil	Criminal		Other	Date Issued			Date Due
Alberto Culver	0	0	0	0	0	0	0	0	1/28/2009	4/15/2009	C	*
Thomas & Betts	0	0	0	0	0	0	0	0	9/10/2009	11/5/2009	C	**
JK Products	0	Zinc	1	0	0	0	0	0	N/A	N/A	C	N/A
Butterball LLC.	0	FOG	1	0	0	0	0	0	N/A	N/A	C	N/A
G & K Services	0	FOG	3	0	0	0	0	0	N/A	N/A	C	N/A
Nestle Prepared Foods	0	FOG	1	0	0	0	0	0	N/A	N/A	C	N/A

\* Alberto Culver initiated a compliance schedule to maintain observance of permit requirements during initial production phase and additional phases of new product lines.

\*\* Thomas & Betts initiated a compliance schedule to install a new sampling facility to meet CWL requirements.

\*\*\* No CWL permitted industries were in Significant Non-Compliance between 9/22/08 - 9/21/09.

## 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): Myra Taylor (Laboratory Supervisor/Pretreatment Coordinator)  
Contact Telephone: 870.930.3389  
E-mail: [mtaylor@jonesborocwl.org](mailto:mtaylor@jonesborocwl.org)

NPDES Permit Numbers: AR0037907 (Westside POTW) &  
AR0043401 (Eastside POTW)

Reporting Period  
-Beginning Month and Year: October 2008  
-Ending Month and Year: September 2009

Total Number of Categorical IUs: 08

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>N/A</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>01/01</u>	<u>01/01</u>
5) Number of SIUs in Significant Noncompliance/ Total Number of SIUs	<u>00/08</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>Non-Categorical</u>
1) Number of Control Documents Issued/ Total Number Required	<u>08/08</u>	<u>10/10</u>
2) Number of Non-sampling Inspections Conducted	<u>08</u>	<u>10</u>
3) Number of Sampling Visits Conducted	<u>88</u>	<u>1305</u>
4) Number of Facilities Inspected (non-sampling)	<u>08</u>	<u>10</u>
5) Number of Facilities Sampled	<u>08</u>	<u>10</u>

### IV. Enforcement Actions

	<u>Significant Industrial Users</u>	
	<u>Categorical</u>	<u>Non Categorical</u>
1) Number of Compliance Schedules Issued/Number of Schedules Required	<u>01/01</u>	<u>01/01</u>
2) Number of Notices of Violations Issued to SIUs	<u>01</u>	<u>05</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

12/18/2009  
Date

# PPS Program Report

\* NPDES ID: ARO 137907 Permittee's Name: Jonesboro

\* Report Received/Event Date: 12/28/2009 Date: 1-8-10

## Report Type

- 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: 10/01/2008

## Significant Industrial Users (SIUs)

SIUs: 18

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: 2

Violation Notices Issued to SIUs: 0

Administrative Orders Issued to SIUs: 0

Civil Suits Filed Against SIUs: 0

Criminal Suits Filed Against SIUs: 0

## Categorical Industrial Users (CIUs)

CIUs: 8

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: 3126

SUO Date: 05/03/1999

Annual Pretreatment Budget: \$           

Pass-Through/Interference Indicator:

Notification of IU Schedule for Remedial Measures:  No

Initial Response to Violation of IU Schedule for Remedial Measures:

## Local Limits

Date of Most Recent Technical Evaluation & or Local Limits: Nov 2007

Date of Most Recent Adoption of Technically Based Local Limits: X

Local Limit Pollutants: X

## Removal Credits

Removal Credits Application Status:  Not Applicable

Date of Most Recent Removal Credits Approval: X

Removal Credits: X

## 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: 4

Annual Frequency of Effluent Toxicant Sampling: 4

Annual Frequency of Sludge Toxicant Sampling: 4