

Gage, Hannah

From: Gilliam, Allen
Sent: Monday, December 28, 2015 9:47 AM
To: 'Myra Taylor'
Cc: Jake Rice; Susan Merideth; Adam Saulsbury; Jay Earley; Jody Gibson; Gage, Hannah; Ramsey, David; Kaelin, Cynthia; Allen-Daniel, Leslie
Subject: AR0043401_Jonesboro CWL AR0037907 Dec 2015 annual Pretreatment Program Status Report_20151228
Attachments: PPSR 2014-15.pdf

Myra,

Jonesboro CWL's December 2015 annual Pretreatment Program report was electronically received, reviewed, deemed complete and compliant with the Pretreatment reporting requirements in 40 CFR 403.12(i), CWL's NPDES Permit #s AR0043401 and AR0037907.

No further action is deemed necessary at this time.

CWL Pretreatment staff are lauded for identifying a source of Hg and eliminating it.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

[E/NPDES/NPDES/Pretreatment/Reports](#)

From: Myra Taylor [<mailto:mtaylor@jonesborocwl.org>]
Sent: Wednesday, December 23, 2015 4:40 PM
To: Gilliam, Allen
Cc: Jake Rice; Susan Merideth; Adam Saulsbury; Jay Earley; Jody Gibson
Subject: Pretreatment Program Status Report

Allen

Please find attached CWL annual Pretreatment Program Status Report. A hard copy will be mailed next week. Have a very Merry Christmas and Happy New Year!!!

Myra Taylor
CWL Laboratory Supervisor
(870) 219-5236 cell
(870) 930-3389 Office
(870) 931-9846 FAX
mtaylor@jonesborocwl.org



Owned by the Citizens of Jonesboro

December 23, 2015

Mr. Allen Gilliam
State Pretreatment Coordinator
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RETURN RECEIPT
CERTIFIED MAIL

Re: 2014-2015 Annual Pretreatment Status Report

Dear Mr. Gilliam,

Enclosed is our 2014-2015 Annual Pretreatment Status report for NPDES permit AR0043401 (AFIN 16-00936) & AR0037907 (AFIN 16-00152). This should satisfy the requirements stated in our NPDES Permit.

City Water and Light is committed to controlling or abating the sources of Mercury entering the Westside Wastewater Treatment Plant (Westside). Sludge drying beds located at an industrial pretreatment facility were identified as a source of mercury. These drying beds were removed on November 13, 2015, and the associated percolate lines that returned to the head of the pretreatment facility were plugged on November 24, 2015. This work was done to ensure that the Westside plant remains in compliance with the Water Quality Standard.

If more information is required, please contact my office at 870.930.3392.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay Earley", is positioned above the typed name and title.

Jay Earley
CWL Pretreatment & Laboratory Coordinator

Monitoring Results For The Annual Pretreatment Report
Reporting Year: October 1, 2014 To September 30, 2015
Treatment Plant: City Water & Light Eastside NPDES Permit # AR0043401 (AFIN 16-00936)
Average Flow : 7.3367 MGD % IU Flow 20.40 %

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)
		10/14/14	2/11/15	4/21/15	7/27/15		10/16/14	2/13/15	4/23/15	7/29/15			
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60.0	200.8	60.0
Cadmium	12.0	0	0	0	0	3.99	0	0	0	0	0.5	200.8	0.5
Copper	88.0	37.7	40.9	34.9	39.9	29.475	4.92	4.09	3.76	4.03	0.5	200.8	0.5
Lead	30.0	1.64	1.24	1.87	1.87	11.7	0	0	0	0	0.5	200.8	0.5
Mercury	0.089	0.046	0.023	0.053	0.054	0.013	0	0.007	0	0	0.005	1631E	0.005
Nickel	140.0	3.88	4.04	6.23	3.60	322.655	2.25	1.54	2.83	1.47	0.5	200.8	0.5
Selenium	12.0	0	0	0	0	5.58	0	0	0	0	5.0	200.8	5.0
Silver	66.0	0.691	0.791	0.917	1.78	6.905	0	0	0	0	0.5	200.8	0.5
Zinc	407.0	95.5	99.8	90.1	95.8	281.872	46.6	49.6	49.2	40.7	20.0	200.8	20.0
Chromium	250.0	0	0	0	0	816.848	0	0	0	0	10.0	4500CNE	10.0
Cyanide	19.0	0	0	0	0	5.803	0	0	0	0	10.0	4500CNE	10.0
Arsenic	23.0	1.33	0.760	0.780	1.90	N/A	1.27	0	0	2.39	0.5	200.8	0.5
Molybdenum	77.0	4.19	9.60	5.72	7.40	N/A	4.50	5.86	4.40	5.17	----	200.8	1.0
Phenols(Total)	4000.0	118.0	36.90	40.0	21.20	N/A	5.500	0	0	8.00	5.0	420.1	5.0
Beryllium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	7.4058	6.2195	6.8449	6.7649	N/A	6.3977	6.1456	6.7539	6.8982	----	----	----
alpha Endosulfan	N/A							0.01357			----	608	0.0100
Mercury Sample Dates		11/24/14	02/03/15	05/19/15	08/24/15		11/26/14	02/05/15	05/21/15	08/26/15			

Monitoring Results For The Annual Pretreatment Report
Reporting Year: October 1, 2014 To September 30, 2015
Treatment Plant: City Water & Light Westside NPDES Permit # AR0037907 (AFIN 16-00152)
Average Flow : 1.6254 MGD % IU Flow 16.305 %

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)
		10/14/14	2/11/15	4/20/15	7/27/15		10/15/14	2/12/15	4/21/15	7/28/15			
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60.0	200.8	60.0
Cadmium	13.0	0	0	0	0	3.99	0	0	0	0	0.5	200.8	0.5
Copper	114.0	32.8	38.9	37.0	50.5	29.475	8.18	9.60	7.57	10.6	0.5	200.8	0.5
Lead	65.0	3.73	4.21	3.35	11.3	11.7	0	0	0	0	0.5	200.8	0.5
Mercury*	0.089	0.053	0.084	0.011	0.030	0.013	0.0054	0	0	0.0056	0.005	1631E	0.005
Nickel	250.0	5.63	4.19	4.80	5.09	322.655	2.87	2.43	3.00	2.69	0.5	200.8	0.5
Selenium	12.0	0	0	0	0	5.58	0	0	0	0	5.0	200.8	5.0
Silver	36.0	0	0	0	0	6.905	0	0	0	0	0.5	200.8	0.5
Zinc	323.0	79.9	125	93.2	129	281.872	22.9	26.3	20.3	0	20.0	200.8	20.0
Chromium	1000.0	0	0	0	0	816.848	0	0	0	0	10.0	4500CNE	10.0
Cyanide	14.0	0	0	5.0	0	5.803	0	0	0	0	10.0	4500CNE	10.0
Arsenic	39.0	6.37	3.74	3.92	4.22	N/A	4.80	3.87	3.52	5.11	0.5	200.8	0.5
Molybdenum	83.0	3.99	3.84	2.84	8.85	N/A	6.23	4.73	6.09	8.93	-----	200.8	1.0
Phenols(Total)	4000.0	9.3	40.0	10.50	22.40	N/A	0	0	0	0	5.0	420.1	5.0
Beryllium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	1.3148	1.2937	1.8527	1.5504	N/A	1.1886	1.1753	1.4292	1.4762	-----	-----	-----
Chlorpyrifos	N/A					N/A		0.0700			-----	608	0.070
Mercury Sample Dates		11/17/14	01/27/15	06/01/15	07/16/15		11/18/14	01/28/15	06/02/15	07/17/15			

* Please note that additional mercury sampling was performed on the West Plant. Results are included in Attachment D.

Attachment A

City Water and Light Plant of the City of Jonesboro
Reporting Year: October 1, 2014 To September 30, 2015

Pretreatment Program Status Report Updated Significant Industrial Users List

Industrial User	Permit Number	SIC / NAIC Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status Reports				Permit Limits (Denote parameter violated & number of times)
				Y/N	Last Action				BMR	90- Day Compliance	Semi-Annual	Self-Monitoring	
Colson Casters Corp ³	8402	3499 / 332439	40 CFR 433.17	Y	10/1/2014	No	1	12	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Apex Tool Group ³	8409	3469 / 332439	40 CFR 433.15	Y	2/1/2013	No	1	12	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Hytrol Conveyor ³	8413	3535 / 333922	40 CFR 433.17	Y	12/1/2012	No	1	12	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Farr Company ³	8702	3564 / 333411	40 CFR 433.17	Y	12/1/2012	No	1	12	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Thomas & Betts ³	9502	3643 / 335931	40 CFR 433.17	Y	11/1/2015	No	1	24	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(Zinc/1)
Trinity Lighting ^{2,3}	9801	3646 / 335122	40 CFR 433.17	Y	6/1/2013	No	1	0	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Best Manufacturing ³	11301	3499 / 332439	40 CFR 433.17	Y	7/1/2013	No	1	12	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Riceland Foods ⁴	8408	2044 / 311212	N/A ⁵	Y	10/1/2011	No	1	70	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(FOG/1)
Butterball LLC. ³	9101	2013 / 311612	N/A ⁵	Y	10/1/2013	No	1	193	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Post Foods ³	9302	2043 / 311230	N/A ⁵	Y	8/1/2013	No	1	326	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
G & K Services ^{3,6}	9701	7218 / 812332	N/A ⁵	Y	12/1/2012	No	1	10	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Frito-Lay Inc. ³	9702	2096 / 311919	N/A ⁵	Y	2/1/2013	No	1	198	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Nestle Prepared Foods ³	10205	2038 / 311412	N/A ⁵	Y	3/1/2011	No	1	194	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(FOG/1)
Unilever ³	10801	2844 / 325620	N/A ⁵	Y	9/1/2011	No	1	193	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(FOG/4)
Nice-Pak Products ³	10811	2844 / 325620	N/A ⁵	Y	3/16/2012	No	1	12	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
SUM							15	1280					

1 - CWL Performs All Monitoring For This IU.

2 - Trinity Lighting had no discharges from October 1, 2014 to September 30, 2015.

3 - Discharges to East Plant (AR0043401)

4 - Discharges to West Plant (AR0037907).

5 - No applicable categorical standard.

6 - G&K Services ceased operations in July 2015.

* CWL currently has 37 permitted, yet Non- Significant Carwashes.

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: 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): Jay Earley (Pretreatment/Laboratory Coordinator)
 Contact Telephone: 870.930.3392
 E-mail: jearley@jonesborocwl.org

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

Reporting Period
 -Beginning Month and Year: 10/01/2014
 -Ending Month and Year: 09/30/2015

Total Number of Categorical IUs: 7
 Total Number of Significant Non-categorical IUs: 8
 Total Number of Non-Significant(yet permitted) IUs: 37

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>00/08</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>0%</u>	

*Metal finishers are submitting semi-annual TOMP certification statements. Industries with accidental or slug/spill discharge control plans are submitting semi-annual certification statements as well. City Water & Light is sampling/monitoring all SIU's.

Attachment C

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>08/08</u>
2) Number of Non-sampling Inspections Conducted / Total Number Required	<u>07/07</u>	<u>08/08</u>
3) Number of Sampling Visits Conducted / Total Number Required	<u>84/14</u>	<u>1196/16</u>
4) Number of Facilities Inspected (non-sampling) / Total Number Required	<u>07/07</u>	<u>08/08</u>
5) Number of Facilities Sampled / Total Number Required	<u>07/07</u>	<u>08/08</u>

IV. 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>01</u>	<u>06</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

12/23/2015
 Date

Attachment D

WEST PLANT 2014-2015 Hg Results			
RESULTS IN PPB			
SAMPLE DATE	W. INF.	W. EFF.	EPA Method Used
11/17/2014	0.0530		1631E
11/18/2014		0.0054	1631E
1/27/2015	0.0840		1631E
1/28/2015		0.0047	1631E
6/1/2015	0.0110		1631E
6/2/2015		0.0048	1631E
6/9/2015	0.0220		1631E
6/10/2015		0.0057	1631E
6/17/2015	0.0230		1631E
6/18/2015		0.0048	1631E
6/23/2015	0.0600		1631E
6/24/2015		0.0029	1631E
6/29/2015	0.0530		1631E
6/30/2015		0.0034	1631E
7/16/2015	0.0300		1631E
7/17/2015		0.0056	1631E
7/20/2015	0.0570		1631E
7/21/2015		0.005	1631E
7/29/2015	0.1500		1631E
7/30/2015		0.024	1631E