

Peltier, Hannah

From: Gilliam, Allen
Sent: Tuesday, December 30, 2014 10:38 AM
To: 'Jay Earley'
Cc: jonesboro myra taylor; jonesboro cwl adam saulsbury; jonesboro susan merideth; jonesboro jody gibson; Fuller, Kim; Peltier, Hannah; Kaelin, Cynthia; Ramsey, David; Allen-Daniel, Leslie
Subject: AR0043401_Jonesboro CWL Dec 2014 annual Pretreatment report with ADEQ reply_20141230
Attachments: 2013-2014 PPSR.pdf

Jay,

Jonesboro CWL's December 2014 report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i).

As discussed via phone yesterday, Attachment B need not be filled out if none of CWL's significant industrial users were in significant non-compliance. It was noted you had footnoted this fact on that attachment however.

Please be aware of CWL's Westside plant's Hg effluent concentrations as three of the four quarters sampled exceed the reasonable potential for exceeding the POTW's water quality criteria possibly subjecting it to future permit limits.

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

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

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

From: Jay Earley [<mailto:jeasley@jonesborocwl.org>]
Sent: Tuesday, December 23, 2014 4:46 PM
To: Gilliam, Allen
Cc: Adam Saulsbury; Susan Merideth; Myra Taylor; Jody Gibson; Jake Rice
Subject: Pretreatment Program Status Report

Mr. Gilliam,

I have attached Jonesboro City Water and Light's 2013-2014 Pretreatment Program Status Report. We are sending a hard copy to you in the mail (return/certified). If you have any question or require any further information please do not hesitate to contact us.

Sincerely,

Jay Earley
Pretreatment & Laboratory Coordinator
Jonesboro City Water and Light
(870) 930-3392
jeasley@jonesborocwl.org



Owned by the Citizens of Jonesboro

December 23, 2014

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: 2013-2014 Annual Pretreatment Status Report

Dear Mr. Gilliam,

Enclosed is our 2013-2014 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). We have worked closely with a local industry to discontinue an operation that was an identified source of Mercury. This industrial operation ceased on January 8, 2014, and CWL is in the final stages of complete Mercury source mitigation for this operation. 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 black ink, appearing to read 'Jay Earley', is written over a light blue horizontal line.

Jay Earley
CWL Pretreatment & Laboratory Coordinator

Monitoring Results For The Annual Pretreatment Report
Reporting Year: October 1, 2013 To September 30, 2014
Treatment Plant: City Water & Light Westside NPDES Permit # AR0037907 (AFIN 16-00152)
Average Flow : 1.6249 MGD % IU Flow 14.601 %

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)
		11/12/13	1/13/14	5/13/14	7/14/14		11/13/13	1/14/14	5/14/14	7/15/14			
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	25.0	21.9	49.4	53.5	29.475	9.29	6.84	7.35	9.89	0.5	200.8	0.5
Lead	65.0	3.12	2.44	5.62	11.7	11.7	0	0.924	1.18	0	0.5	200.8	0.5
Mercury	0.089	0.023	0.012	0.0035	0.055	0.013	0.012	0.0087	0.0064	0	0.005	1631E	0.005
Nickel	250.0	3.02	4.20	5.75	7.91	322.655	2.06	2.82	2.05	2.62	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	0.522	0	0	0	6.905	0	0	0	0	0.5	200.8	0.5
Zinc	323.0	84.4	80.0	113	178	281.872	24.3	30.9	0	20.6	20.0	200.8	20.0
Chromium	1000.0	0	0	0	0	816.848	0	0	0	0	10.0	200.8	10.0
Cyanide	14.0	0	0	0	0	5.803	0	0	0	0	10.0	4500CNE	10.0
Arsenic	39.0	2.68	1.58	3.22	5.05	N/A	2.29	1.53	2.93	3.91	0.5	200.8	0.5
Molybdenum	83.0	8.79	4.18	3.57	9.66	N/A	4.34	2.01	1.57	8.50	----	200.8	1.0
Phenols(Total)	4000.0	10.8	0	9.6	36.90	N/A	0	0	0	5.500	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	0.9262	1.6548	3.4304	1.9026	N/A	0.8872	1.4990	6.4687	1.3036	----	----	----
Phenol	N/A		10.8			N/A					----	625	10.0
Bis(2-ethylhexyl)phthalate	N/A		11.8			N/A					----	625	10.0
Mercury Sample Dates		12/26/13	03/18/14	06/03/14	09/03/14		12/27/13	03/19/14	06/04/14	09/04/14			

Monitoring Results For The Annual Pretreatment Report
Reporting Year: October 1, 2013 To September 30, 2014
Treatment Plant: City Water & Light Eastside NPDES Permit # AR0043401 (AFIN 16-00936)
Average Flow : 7.3678 MGD % IU Flow 19.95 %

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)
		11/11/13	1/14/14	5/13/14	7/14/14		11/13/13	1/16/14	5/15/14	7/16/14			
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	45.0	29.6	31.8	46.8	29.475	5.94	3.45	3.04	5.97	0.5	200.8	0.5
Lead	30.0	1.80	1.10	1.96	3.96	11.7	0	0	1.36	0.782	0.5	200.8	0.5
Mercury	0.089	0.088	0.013	0.069	0.026	0.013	0	0	0	0	0.005	1631E	0.005
Nickel	140.0	4.73	3.89	4.05	4.95	322.655	1.88	1.26	1.40	2.49	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	1.21	1.18	0.703	0.889	6.905	0	0	0	0	0.5	200.8	0.5
Zinc	407.0	117	84.6	84.5	148	281.872	41.2	38.2	37.4	46.3	20.0	200.8	20.0
Chromium	250.0	0	0	0	0	816.848	0	0	0	0	10.0	200.8	10.0
Cyanide	19.0	0	0	0	0	5.803	0	0	0	0	10.0	4500CNE	10.0
Arsenic	23.0	1.26	0.767	1.77	1.46	N/A	0	0	0.863	0	0.5	200.8	0.5
Molybdenum	77.0	4.52	4.01	3.69	6.17	N/A	2.94	2.61	3.96	4.58	----	200.8	1.0
Phenols(Total)	4000.0	0	16.0	14.0	37.50	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	6.0134	7.6157	11.2840	7.9318	N/A	5.6497	8.8497	10.3363	6.3967	----	----	----
Ethylbenzene	N/A		10.5			N/A					----	624	10.0
beta-BHC	N/A		0.0690			N/A					----	608	0.050
Bis(2-ethylhexyl)phtalate	N/A		10.8			N/A					----	625	10.0
Mercury Sample Dates		11/18/13	02/25/14	05/20/14	08/26/14		11/20/13	02/27/14	05/22/14	08/28/14			

Attachment A

City Water and Light Plant of the City of Jonesboro
Reporting Year: October 1, 2013 To September 30, 2014

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	6/1/2010	No	1	45	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
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	19	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	101	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Butterball LLC. ³	9101	2013 / 311612	N/A ⁵	Y	10/1/2013	No	1	224	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(FOG/8)
Post Foods ³	9302	2043 / 311230	N/A ⁵	Y	8/1/2013	No	1	365	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
G & K Services ³	9701	7218 / 812332	N/A ⁵	Y	12/1/2012	No	1	12	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	196	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	202	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C
Unilever ³	10801	2844 / 325620	N/A ⁵	Y	9/1/2011	No	1	219	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(FOG/11)
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	1443					

1 - CWL Performs All Monitoring For This IU.

2 - Trinity Lighting had 0 discharges in 2014.

3 - Discharges to East Plant (AR0043401)

4 - Discharges to West Plant (AR0037907).

5 - No applicable categorical standard.

* CWL currently has 39 permitted, yet Non- Significant Carwashes.

Attachment B

City Water and Light Plant of the City of Jonesboro

Reporting Year: October 1, 2013 To September 30, 2014

Significant Non-Compliant (SNC) Industries - 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		
Butterball LLC.	0	FOG	8	0	0	0	0	\$0.00	N/A	N/A	C	N/A
Unilever	0	FOG	11	0	0	0	0	\$0.00	N/A	N/A	C	N/A

* No CWL permitted industries were in Significant Non-Compliance between 10/01/13 - 9/30/14.

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: 10/01/2013
-Ending Month and Year: 09/30/2014

Total Number of Categorical IUs: 7
Total Number of Significant Non-categorical IUs: 8
Total Number of Non-Significant(yet permitted) IUs: 39

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>NA</u>
2) Number of SIUs Submitting 90-Day Compliance Reports/ Number Required	<u>NA</u>	<u>NA</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 and City Water & Light is sampling/monitoring all SIUs.

Attachment C

III. Compliance Monitoring Program

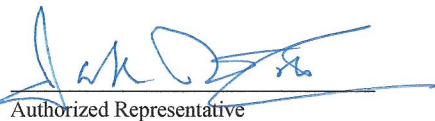
	<u>Significant Industrial Users</u>	
	<u>Categorical</u>	<u>Noncategorical</u>
1) Number of Control Documents Issued/ Total Number Required	<u>07/07</u>	<u>08/08</u>
2) Number of Non-sampling Inspections Conducted/ Total Number Required	<u>07/07</u>	<u>08/08</u>
3) Number of Sampling Visits Conducted/ Total Number Required	<u>112/14</u>	<u>1331/16</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>00</u>	<u>19</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

12/22/2014
Date