

## Gage, Hannah

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**From:** Yates, Adam  
**Sent:** Thursday, March 09, 2017 4:40 PM  
**To:** Myra Taylor  
**Cc:** Adam Saulsbury; Jay Earley; Jody Gibson; Jessie Hager; Gage, Hannah; Johnson, Lindsay; McWilliams, Carrie; Leamons, Bryan; Healey, Richard; Allen-Daniel, Leslie  
**Subject:** RE: AR0043401\_Jonesboro CWL Dec 2016 Pretreatment Program Annual Report\_20161220  
**Attachments:** 2017 PPSR.pdf

Myra,

City Water & Light Plant of the City of Jonesboro's December 2016 Pretreatment Program Annual Report was received, reviewed, and deemed complete according to the reporting requirements of 40 CFR 403.12(i). I appreciate your patience with me as I adjust to the duties of State Pretreatment Coordinator.

Thank you for your timely submittal. If you have any questions or concerns, please feel free to contact me.

Kindly,

Adam Yates  
Engineer, NPDES Permits Section  
Office of Water Quality

E:\NPDES\NPDES\Pretreatment\Reports

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**From:** Myra Taylor [<mailto:mtaylor@jonesborocwl.org>]  
**Sent:** Tuesday, December 20, 2016 1:59 PM  
**To:** Yates, Adam  
**Cc:** Adam Saulsbury; Jay Earley; Jody Gibson; Jessie Hager  
**Subject:** Annual PPSR

Mr. Yates,

Please find attached CWL Annual Pretreatment Program Status Report. This should satisfy the requirement stated in our NPDES permits.

Have a 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](mailto:mtaylor@jonesborocwl.org)

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*Owned by the Citizens of Jonesboro*

December 20, 2016

Mr. Adam Yates  
Permit Engineer  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

RETURN RECEIPT

CERTIFIED MAIL

Re: 2015-2016 Annual Pretreatment Status Report

Dear Mr. Yates,

Enclosed is our 2015-2016 Annual Pretreatment Status report for NPDES permit AR0043401 (AFIN 16-00936) & AR0037907 (AFIN 16-00152). This should satisfy the requirements stated in our NPDES Permits.

City Water and Light (CWL) 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. Following this change to the influent waste streams, CWL began collecting mercury samples on November 23, 2015. These samples allowed CWL to re-characterize mercury concentrations in the Westside effluent. Attachment D summarizes the mercury data collected.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Myra Taylor", is written over a faint, larger version of the same signature.

Myra Taylor  
CWL Lab Supervisor

Jake Rice III, MANAGER

**CITY WATER & LIGHT** • 400 East Monroe • P.O. Box 1289 • Jonesboro, Arkansas 72403-1289 • 870/935-5581

**Monitoring Results For The Annual Pretreatment Report**  
**Reporting Year: October 1, 2015 To September 30, 2016**  
**Treatment Plant: City Water & Light Westside NPDES Permit # AR0037907 (AFIN 16-00152)**  
**Average Flow : 1.6828 MGD % IU Flow 11.04 %**

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)
		10/12/15	1/11/16	4/11/16	7/11/16		10/13/15	1/12/16	4/12/16	7/12/16			
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	39.3	24.4	41.9	65.5	29.475	9.14	8.62	9.16	9.60	0.5	200.8	0.5
Lead	65.0	5.72	1.55	6.24	3.04	11.7	0.827	0.580	0.521	0	0.5	200.8	0.5
Mercury*	0.089	0	0.022	0.073	0.051	0.013	0.0051	0.0050	0.0063	0	0.005	1631E	0.005
Nickel	250.0	5.01	3.29	5.62	6.30	322.655	2.67	2.08	2.91	3.22	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	0.544	6.905	0	0	0	0	0.5	200.8	0.5
Zinc	323.0	108	46.90	186	132	281.872	0	20.7	28.3	0	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	3.71	3.34	4.81	4.44	N/A	3.27	2.79	3.28	3.31	0.5	200.8	0.5
Molybdenum	83.0	9.72	3.14	6.07	11.9	N/A	6.50	4.42	4.67	8.68	----	200.8	1.0
Phenols(Total)	4000.0	47.20	20.6	71.90	0	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	1.4167	2.0730	1.3189	1.3153	N/A	1.2217	1.8456	1.2323	1.3344	----	----	----
Mercury Sample Dates		12/07/15	02/17/16	06/21/16	09/07/16		12/08/15	02/18/16	06/22/16	09/08/16			

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

**Monitoring Results For The Annual Pretreatment Report**  
**Reporting Year: October 1, 2015 To September 30, 2016**  
**Treatment Plant: City Water & Light Eastside NPDES Permit # AR0043401 (AFIN 16-00936)**  
**Average Flow : 7.6107 MGD % IU Flow 21.17 %**

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)
		10/13/15	1/12/16	4/11/16	7/12/16		10/15/15	1/14/16	4/13/16	7/14/16			
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	42.4	21.8	38.4	41.1	29.475	2.25	4.09	4.58	4.83	0.5	200.8	0.5
Lead	30.0	1.21	0.651	2.34	1.11	11.7	0	0	0	0	0.5	200.8	0.5
Mercury	0.089	0	0.100	0.027	0.790	0.013	0	0	0.0061	0	0.005	1631E	0.005
Nickel	140.0	3.53	3.00	3.79	3.89	322.655	1.23	1.11	1.69	2.87	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	0.808	0	0	0	6.905	0	0	0	0	0.5	200.8	0.5
Zinc	407.0	107	59.6	113	102	281.872	48.2	37.9	66.2	58.3	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	0.597	0.832	1.080	0.948	N/A	0	0.593	0.597	0	0.5	200.8	0.5
Molybdenum	77.0	6.06	6.48	7.77	12.20	N/A	3.92	4.33	6.75	10.8	----	200.8	1.0
Phenols(Total)	4000.0	21.50	14.30	42.40	0	N/A	0	0	8.900	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	6.3636	7.9344	6.8628	6.7045	N/A	6.2599	7.4758	6.7448	8.0032	----	----	----
Mercury Sample Dates		11/10/15	03/21/16	06/13/16	09/12/16		11/12/15	03/23/16	06/15/16	09/14/16			

## Attachment A

City Water and Light Plant of the City of Jonesboro  
Reporting Year: October 1, 2015 To September 30, 2016

<b>Pretreatment Program Status Report Updated Significant Industrial Users List</b>													
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 <sup>3</sup>	8402	3469 / 332116	40 CFR 433.17	Y	10/1/2014	No	1	19	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	NC(Zinc/3)
Apex Tool Group <sup>3</sup>	8409	3469 / 332439	40 CFR 433.15	Y	2/1/2013	No	1	12	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
Hytrol Conveyor <sup>3</sup>	8413	3535 / 333922	40 CFR 433.17	Y	12/1/2012	No	1	12	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
Farr Company <sup>3</sup>	8702	3564 / 333411	40 CFR 433.17	Y	12/1/2012	No	1	12	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
Thomas & Betts <sup>3</sup>	9502	3498 / 332996	40 CFR 433.17	Y	11/1/2015	No	1	12	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
Trinity Lighting <sup>2,3</sup>	9801	3646 / 335122	40 CFR 433.17	Y	6/1/2013	No	1	0	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
Best Manufacturing <sup>3</sup>	11301	3499 / 332999	40 CFR 433.17	Y	7/1/2013	No	1	12	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
Riceland Foods <sup>4</sup>	8408	2044 / 311212	N/A <sup>5</sup>	Y	2/1/2014	No	1	50	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
Butterball LLC. <sup>3</sup>	9101	2015 / 311615	N/A <sup>5</sup>	Y	10/1/2013	No	1	198	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	NC(FOG/2)
Post Foods <sup>3</sup>	9302	2043 / 311230	N/A <sup>5</sup>	Y	8/1/2013	No	1	341	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	NC(FOG/3)
Frito-Lay Inc. <sup>3</sup>	9702	2096 / 311919	N/A <sup>5</sup>	Y	2/1/2013	No	1	191	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
Nestle Prepared Foods <sup>3</sup>	10205	2038 / 311412	N/A <sup>5</sup>	Y	8/1/2014	No	1	197	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	NC(FOG/1)
Unilever <sup>3</sup>	10801	2844 / 325620	N/A <sup>5</sup>	Y	11/1/2013	No	1	203	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
Nice-Pak Products <sup>3</sup>	10811	2844 / 325620	N/A <sup>5</sup>	Y	3/16/2012	No	1	12	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
TrinityRail Maintenance Service, Inc. <sup>3</sup>	11503	4789 / 488210	N/A <sup>5</sup>	Y	11/16/2015	Yes	1	42	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	N/A <sup>1</sup>	C
SUM							15	1313					

1 - CWL Performs All Monitoring For This IU.

2 - Trinity Lighting had no discharges from October 1, 2015 to September 30, 2016.

3 - Discharges to East Plant (AR0043401)

4 - Discharges to West Plant (AR0037907).

5 - No applicable categorical standard.

\* CWL currently has 34 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): Myra Taylor (Pretreatment Coordinator/Laboratory Supervisor)  
Contact Telephone: 870.930.3389  
E-mail: [mtaylor@jonesborocwl.org](mailto:mtaylor@jonesborocwl.org)

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

#### Reporting Period

-Beginning Month and Year: 10/01/2015  
-Ending Month and Year: 09/30/2016

Total Number of Categorical IUs: 7  
Total Number of Significant Non-categorical IUs: 8  
Total Number of Non-Significant(yet permitted) IUs: 34

#### II. Significant Industrial User Compliance

	Significant Industrial Users	
	<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. 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>79/14</u>	<u>1234/16</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>03</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

12/20/2016  
Date



## Attachment D

<b>WEST PLANT 2015-2016 Hg Results</b>			
RESULTS IN PPB			
<b>SAMPLE DATE</b>	<b>W. INF.</b>	<b>W. EFF.</b>	<b>EPA Method Used</b>
11/23/2015	0.0120		1631E
11/24/2015		0.0043	1631E
12/3/2015	0.0037		1631E
12/4/2015		0.0048	1631E
12/7/2015	0.0018		1631E
12/8/2015		0.0051	1631E
12/8/2015	0.0017		1631E
12/9/2015		0.0056	1631E
12/17/2015	0.0610		1631E
12/18/2015		0.0068	1631E
1/5/2016	0.0210		1631E
1/6/2016		0.0052	1631E
1/12/2016	0.0730		1631E
1/13/2016		0.0054	1631E
1/13/2016	0.0730		1631E
1/14/2016		0.0056	1631E
1/18/2016	0.0200		1631E
1/19/2016		0.0056	1631E
1/25/2016	0.0500		1631E
1/26/2016		0.0045	1631E
1/26/2016	0.0660		1631E
1/27/2016		0.0054	1631E

1/27/2016	0.0280		1631E
1/28/2016		0.0060	1631E
1/28/2016	0.0240		1631E
1/29/2016		0.0049	1631E
2/3/2016	0.0280		1631E
2/4/2016		0.0053	1631E
2/4/2016	0.0230		1631E
2/5/2016		0.0050	1631E
2/8/2016	0.0320		1631E
2/9/2016		0.0046	1631E
2/9/2016	0.0240		1631E
2/10/2016		0.0051	1631E
2/10/2016	0.0210		1631E
2/11/2016		0.0058	1631E
2/11/2016	0.0310		1631E
2/12/2016		0.0048	1631E
2/17/2016	0.0220		1631E
2/18/2016		0.0050	1631E
6/21/2016	0.0730		1631E
6/22/2016		0.0063	1631E
9/7/2016	0.0510		1631E
9/8/2016		0.0050	1631E