

Re: CWL Jonesboro- PPSR 2019-2020

Yates, Adam

Thu 4/29/2021 10:04 AM

To: Whitney Young <wyoung@jonesborocwl.org>;

Cc: Jake Rice <jrice@jonesborocwl.org>; Adam Saulsbury <asaulsbury@jonesborocwl.org>; Jay Earley <jearley@jonesborocwl.org>; Jody Gibson <jgibson@jonesborocwl.org>; McWilliams, Carrie <mcwilliamsc2@adeq.state.ar.us>; Healey, Richard <HEALEYR@adeq.state.ar.us>; Ramsey, David <RAMSEY@adeq.state.ar.us>; Allen-Daniel, Leslie <ALLEN-DANIEL@adeq.state.ar.us>;

Whitney,

City of Jonesboro's Dec 2020 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 on this matter, please feel free to contact me.

Kindly,

Adam Yates | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
5301 Northshore Drive | North Little Rock, AR 72118
t: (501) 682-0617 | e: yates@adeq.state.ar.us

From: Whitney Young <wyoung@jonesborocwl.org>
Sent: Tuesday, December 15, 2020 3:23 PM
To: Yates, Adam
Cc: Jake Rice; Adam Saulsbury; Jay Earley; Jody Gibson
Subject: CWL Jonesboro- PPSR 2019-2020

Adam,
Please see the attached letter and documentation for our 2019-2020 Annual Pretreatment Status Report. If more information is required, please let me know.
Thank you,

Whitney Young
Laboratory Supervisor
City Water & Light
Jonesboro, AR
(office) 870.930.3389



Owned by the Citizens of Jonesboro

December 15, 2020

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

Re: 2019-2020 Annual Pretreatment Status Report

Dear Mr. Yates,

Please find, included with this letter, our 2019-2020 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.

If more information is required, please contact my office at 870.930.3389.

Sincerely,

A handwritten signature in blue ink that reads 'Whitney Young'.

Whitney Young
CWL Laboratory Supervisor/Pretreatment Coordinator

Monitoring Results For The Annual Pretreatment Report
Reporting Year: October 1, 2019 To September 30, 2020
Treatment Plant: City Water & Light Eastside NPDES Permit # AR0043401 (AFIN 16-00936)
Average Flow : 8.6039 MGD % IU Flow 21.71 %

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)
		10/15/19	1/21/20	4/21/20	7/21/20		10/17/19	1/23/20	4/23/20	7/23/20			
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	36.7	26.0	30.6	44.1	29.475	2.35	3.96	3.06	7.97	0.5	200.8	0.5
Lead	30.0	1.73	0.792	1.46	1.30	11.7	0	0	0	0	0.5	200.8	0.5
Mercury	0.089	0.059	0.064	0.010	0.018	0.013	0.011	0	0	0	0.005	1631E	0.005
Nickel	140.0	5.55	3.74	3.83	4.05	322.655	1.82	1.73	2.16	2.23	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	0	0	0	6.905	0	0	0	0	0.5	200.8	0.5
Zinc	407.0	130	80.2	101	110	281.872	43.4	43.0	28.7	35.2	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	1.50	0.728	0.952	0.908	N/A	0	0	0.564	0	0.5	200.8	0.5
Molybdenum	77.0	1.76	2.37	6.98	2.78	N/A	0	1.37	4.17	1.98	----	200.8	1.0
Phenols(Total)	4000.0	30.40	10.30	14.80	17.80	N/A	0	5.500	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	7.9987	7.7535	7.1815	6.8189	N/A	6.9665	13.9696	9.4565	6.4667	----	----	----
Dichlorobromomethane	N/A					N/A		14.9			----	----	----
Chloroform	N/A					N/A		28.9			----	----	----
Mercury Sample Dates		12/02/19	03/11/20	06/02/20	09/08/20			12/04/19	03/13/20	06/04/20	09/10/20		

Monitoring Results For The Annual Pretreatment Report
Reporting Year: October 1, 2019 To September 30, 2020
Treatment Plant: City Water & Light Westside NPDES Permit # AR0037907 (AFIN 16-00152)
Average Flow : 2.5064 MGD % IU Flow 8.68 %

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)
		10/14/19	1/20/20	4/20/20	7/22/20		10/15/19	1/21/20	4/21/20	7/21/20			
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	24.5	18.7	25.8	22.5	29.475	9.91	6.95	9.00	6.83	0.5	200.8	0.5
Lead	65.0	2.74	2.46	4.51	1.06	11.7	0.866	0	0.721	0	0.5	200.8	0.5
Mercury	0.089	0.029	0.014	0.017	0.019	0.013	0.011	0	0	0	0.005	1631E	0.005
Nickel	250.0	4.24	3.99	4.76	2.52	322.655	2.69	2.72	2.56	2.50	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	82.3	85.5	105	80.3	281.872	25.8	28.2	21.3	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	3.93	3.19	4.08	0	N/A	3.35	2.82	3.75	4.19	0.5	200.8	0.5
Molybdenum	83.0	1.62	1.25	1.29	2.84	N/A	1.60	1.07	1.42	1.73	----	200.8	1.0
Phenols(Total)	4000.0	27.40	18.40	17.50	10.60	N/A	0	5.500	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	1.7624	1.9449	1.9103	1.7856	N/A	2.3073	1.9566	1.8353	2.0098	----	----	----
Mercury Sample Dates		10/28/19	02/25/20	06/16/20	09/15/20		10/29/19	02/26/20	06/17/20	09/16/20			

Attachment A

City Water and Light Plant of the City of Jonesboro
Reporting Year: October 1, 2019 To September 30, 2020

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 / 332813	40 CFR 433.17	Y	10/1/2019	No	1	10	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	2/1/2018	No	1	10	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C	
Hytrol Conveyor ³	8413	3535 / 333922	40 CFR 433.17	Y	12/15/2017	No	1	10	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C	
Camfil APC (Farr APC) ³	8702	3564 / 333413	40 CFR 433.17	Y	12/15/2017	No	1	6	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C	
ABB Installation Products, Inc. (Thomas&Betts) ³	9502	3643 / 335932	40 CFR 433.17	Y	9/1/2018	No	1	10	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	7/1/2018	No	1	0	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C	
Best Manufacturing ³	11301	3499 / 332999	40 CFR 433.17	Y	7/1/2018	No	1	10	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C	
Riceland Foods ⁴	8408	2044 / 311212	N/A ⁵	Y	2/1/2019	No	1	75	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C	
Butterball LLC. ³	9101	2013 / 311613	N/A ⁵	Y	9/1/2018	No	1	185	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(FOG/3)	
Post Foods ³	9302	2043 / 311230	N/A ⁵	Y	8/1/2018	No	1	309	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(FOG/4)	
Frito-Lay Inc. ³	9702	2096 / 311919	N/A ⁵	Y	7/1/2018	No	1	237	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C	
Nestle Prepared Foods ³	10205	2038 / 311412	N/A ⁵	Y	8/1/2019	No	1	174	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(FOG/6)	
Unilever ³	10801	2844 / 325620	N/A ⁵	Y	11/22/2016	No	1	176	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C	
Nice-Pak Products ³	10811	2844 / 325620	N/A ⁵	Y	12/1/2016	No	1	12	N/A ¹	N/A ¹	N/A ¹	N/A ¹	C	
TrinityRail Maintenance Service, Inc. ³	11503	4789 / 488210	N/A ⁵	Y	7/15/2017	No	1	47	N/A ¹	N/A ¹	N/A ¹	N/A ¹	NC(FOG/1)	
SUM							15	1271						

1 - CWL Performs All Monitoring For This IU.

2 - Trinity Lighting had no discharges from October 1, 2019 to September 30, 2020.

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 B

City Water and Light Plant of the City of Jonesboro
Reporting Year: October 1, 2019 To September 30, 2020

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		
Post Foods		4	4	0	0	0	0	\$0.00	N/A	N/A	C	*
				0	0	0	0	\$0.00	N/A	N/A	C	N/A
				0	0	0	0	\$0.00	N/A	N/A	C	N/A
				0	0	0	0	\$0.00	N/A	N/A	C	N/A

*Significant Noncompliance for FOG Technical Review Criteria violations

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): Whitney Young (Laboratory Supervisor/Pretreatment Coordinator)
 Contact Telephone: 870.930.3389
 E-mail: wyoung@jonesborocwl.org

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

Reporting Period
 -Beginning Month and Year: 10/01/2019
 -Ending Month and Year: 09/30/2020

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

	<u>Significant Industrial Users</u>	
	<u>Categorical</u>	<u>Non-categorical</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>01/08</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and Non-categorical)	<u>6.7%</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>Non-categorical</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>56/14</u>	<u>1215/16</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>Non-categorical</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>14</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>01</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

12/15/2020
 Date



Newspaper Notice of Significant Violators

In compliance with 40 CFR of the General Pretreatment Regulations, the following permitted industry, having significantly violated Pretreatment requirements, is submitted to the largest newspaper in the municipality. Although listed as a significant violator, the permitted industry was only in noncompliance for a short time and did not upset the routine operations of the local publicly owned treatment works.

Company:

Post Consumer Brands

Site Address:

5800 C.W. Post Road, Jonesboro, AR 72401

(To be published in The Sun, Jonesboro, AR, December 25, 2020)