

Peltier, Hannah

From: Gilliam, Allen
Sent: Monday, December 15, 2014 2:09 PM
To: jonesboro myra taylor
Cc: 'Jay Earley'; Fuller, Kim; Peltier, Hannah; Healey, Richard
Subject: AR0043401_Jonesboro Sept 2014 Pretreatment Program Audit Response with ADEQ reply_20141215
Attachments: DOC_20141212092913.pdf

Myra,

Jonesboro City Water and Light's (CWL) submittal of corrective action to the City's Pretreatment Program deficiency was received and deemed adequate.

Thank you for considering this office's recommendations also. It is believed these recommendations will only solidify more detailed Pretreatment Program implementation and create more Pollution Prevention (P2) activities within its non-domestic contributors' universe.

Thank you for your timely response.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Richard Healey, NPDES Enforcement Branch Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Myra Taylor [<mailto:mtaylor@jonesborocwl.org>]
Sent: Friday, December 12, 2014 1:11 PM
To: Gilliam, Allen
Subject: 2014 Audit Response

Allen,

Attached is City Water & Light (CWL) response to the 2014 Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment. A hard copy is being mailed today to you returned/certified.

If you need anything else, please let me know.

Have a great afternoon,

Mrs. Myra Taylor
CWL Laboratory Supervisor
400 E. Monroe
P. O. Box 1289

Jonesboro, AR 72403
office # (870) 930-3389
work cell # (870) 219-5236
FAX # (870) 931-9846
mtaylor@jonesborocwl.org



Owned by the Citizens of Jonesboro

December 11, 2014

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

RETURN RECEIPT
CERTIFIED MAIL

RE: CWL Response to Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Gilliam:

In accordance with requirements stated in NPDES Permit Number AR0043401 / AFIN 16-00936 and NPDES Permit Number AR0037907 / AFIN 16-00152, this letter serves as written response to the report dated November 12, 2014.

Required Actions

1. Toxic Organic Management Plans (TOMPs) and Slug Control Plans (SCPs) are currently included as Pretreatment requirements in applicable permits in accordance with the 40 CFR 403.8. These BMP implementation and compliance reporting requirements are not included in the effluent limitation section but are included in other appropriate section(s) of applicable permits.

City Water and Light (CWL) will modify the "Effluent Limitation" section to include Best Management Practice (BMP) acronyms in the Discharge limitations table with a footnote referencing the appropriate section of the permit that further describes these BMPs. Most Industrial User (IU) permits include language that describes the TOMP and SCP as "on file" and "approved by CWL on [date]". With this modification, CWL will include the above language in all applicable IU permits.

CWL will require applicable IUs to submit SCP implementation certification statements semi-annually. These certification statements will serve as documentation that the IUs are implementing their submitted/approved SCPs.

Recommended Actions

1. Industries practicing pollution prevention (P2) have these practices listed in their fact sheet along with P2 success stories. CWL will continue to update applicable IU fact sheets as we become aware of additional P2 practices at our permitted industries.
2. As resources allow, CWL will research and consider options for sending IU/business sector specific surveys tailored with questions specific to their wastewater generating processes.
3. In 2009, CWL sent the reporting requirements located in 40 CFR 403.12 (p) and (j) to all the hazardous waste generators, within the CWL service area, that were listed on the ADEQ

Jake Rice III, MANAGER

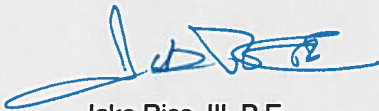
CITY WATER & LIGHT • 400 East Monroe • P.O. Box 1289 • Jonesboro, Arkansas 72403-1289 • 870/935-5581

website. CWL also sent these reporting requirements to all our permitted IUs listed on ADEQ's website in 2008 and 2011. CWL will send the reporting requirements located in 40 CFR 403.12 (p) and (j) to the generators, within the CWL service area, that are listed on ADEQ's hazardous waste generators list in 2016 and at least once every 5 years thereafter.

4. In response to the 2008 Pretreatment Audit recommendation, CWL updated the CWL annual inspection form for categorical industries to include questions regarding the TOMP. These questions were designed to insure the industry personnel are familiar with the TOMP and that the TOMP is current. In response to the 2011 Pretreatment Audit recommendation, CWL began performing a more in depth review of the TOMP's during annual inspections to further verify that all essential categorical industry personnel are familiar with their TOMP and that the TOMP is current. CWL will ask our categorical industries to review their TOMP for current accuracy and to re-sign and re-date it periodically.
5. The bypass prohibition per 40 CFR 403.17(d) is included in the Sewer Use-Pretreatment Ordinance. CWL will begin including this language in every SIU's permit conditions.
6. CWL's current IU inspection form uses a system of check boxes and comment sections to: identify sources of regulated waste, classify flow, evaluate process and pretreatment systems, describe the appearance of the operation and maintenance of all appurtenances, assess chemical/hazardous waste storage and handling procedures, and evaluate pollution prevention practices. CWL will consider adding more narrative to the IU inspection form and/or referencing the IUs permit/fact sheet for more specific information as necessary.
7. CWL will work with SIUs to obtain more comprehensive schematics and process descriptions when, in the opinion of CWL, such records would benefit the implementation of the Pretreatment Program.
8. CWL will search for opportunities for public outreach efforts concerning proper disposal of items that may harm the environment, public health, and/or cause pass through or interference at the Publicly Owned Treatment Works (POTW).
9. CWL is continuing to work on our IU sampling standard operating procedure (SOP). Once complete, the SOP will be considered a living document that is used on a daily basis to enhance the implementation of our Pretreatment Program.

These actions should address the requirement and recommendations stated in the ADEQ November 12, 2014 Audit/Assessment report. CWL would like to thank Mr. Gilliam and the department for the assistance in improving the CWL Pretreatment Program and achieving the objectives of the Clean Water Act. If you have any questions or more information is required, please contact my office at (870) 930-3310

Sincerely,



Jake Rice, III, P.E.
Manager
Jonesboro City Water & Light Plant

JR/je