

# ADEQ

ARKANSAS  
Department of Environmental Quality

April 24, 2006

Ronald Bowen, Plant Manager  
City Water & Light of Jonesboro  
P.O. Box 1289  
Jonesboro, AR 72403

Re: Pretreatment Compliance Inspection

AFIN: 16-00152 NPDES Permit No.: AR0043401

Dear Mr. Bowen:

On April 13, 2006, I performed a routine pretreatment compliance inspection of your facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder. This inspection revealed that you are in compliance with the terms of your permit. Please see the inspection report for comments and minor deficiencies.

I am very pleased to inform you that the pretreatment staff has demonstrated a tremendous increase in knowledge of the program since the last inspection.

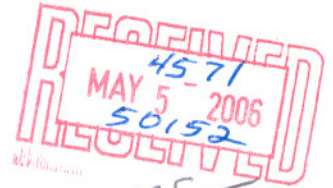
If I can be of any assistance, please contact me at 870-935-7221 ext.-12.

Sincerely,

*Frank Ery*

*for*  
Brent L. Walker  
District 3 Field Inspector  
Water Division

cc: NPDES Branch



*HE*  
*NO action*  
*NECESSARY*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

# NPDES Compliance Inspection Report

## Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1   N   2   5   3   A   R   0   0   4   3   4   0   1   11   12   0   6   0   4   1   3   17   18   P   19   S   20   1					
Remarks					
A   F   I   N   1   6   -   0   0   1   5   2					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67       69	70   N	71   N	72   N	73       74   75         80	

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>Jonesboro City Water and Light – East Treatment Plant</b> 5205 Ingles Rd. Jonesboro, AR Craighead County	Entry Time /Date 0930 04/13/2006	Permit Effective Date April 1, 2001
	Exit Time/Date 1800 04/13/2006	Permit Expiration Date March 31, 2006
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Myra Taylor/Pretreatment Coordinator & Laboratory Supervisor - Jody Gibson/Pretreatment Specialist/870-930-3389 Susan Merideth/Treatment Superintendent/870-930-3387	Other Facility Data 35.791505°N -90.633395°W	
Name, Address of Responsible Official/Title/Phone and Fax Number Ronald Bowen/Plant Manager/870-930-3300 City Water and Light of Jonesboro P.O. Box 1289 Jonesboro, AR 72403	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

**Much improved since last inspection.**  
**Overall Satisfactory Pretreatment Program**  
  
See attached report for details.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext.-12/(870) 935-4715	Date April 21, 2006
ddw		
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

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Name of Municipality: City of Jonesboro

AFIN Number: 16-00152

NPDES Permit Numbers: AR0037907 and AR0043401

Program Tracked under NPDES Permit Number: AR0043401

Fact Sheet Preparation Date: August 31, 2005

Date of Last PCI/Audit: December 16 & 17, 2004

Date of Last Annual Report: December 12, 2005

Name of Inspector: Brent Walker & Dale Washam

Date PCI Performed: April 13, 2006

Name, Title, and Telephone Number of Facility Representative:  
Myra Taylor- Pretreatment Coordinator and Laboratory Supervisor

Name and Title of Other Participants:  
Jody Gibson- Pretreatment Specialist  
Susan Merideth- Associate Engineer

Number of IUs Visited: 2

Name(s) of IUs Visited: Thomas and Betts Corporation  
Nestle Prepared Foods

Note: AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

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**NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.**

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. Deleted: General Electric and Haworth. None added.
2. Has ADPC&E or EPA been notified of these changes? No
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes; GE & Haworth removed after the preparation of last annual report.**
4. What procedures are being used to update the IU Survey? Review of new connections to the two treatment systems, review of Jonesboro Chamber of Commerce Directory, City engineer and local newspaper.
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 17
6. Number of Categorical Industrial Users: 9
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Limits are determined according to the regulations and 40 CFR using SIC code and process type in IU survey.
8. List all categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (such as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
<u>Colson Caster</u>	<u>metal finishing</u>	<u>Zinc electroplating</u>
<u>Delta Cons.Ind.</u>	<u>metal finishing</u>	<u>Phosphatizing line</u>
<u>Hytrol Conveyor</u>	<u>metal finishing</u>	<u>Phosphatizing and power paint</u>
<u>Farr Company</u>	<u>metal finishing</u>	<u>Phosphatizing line</u>
<u>Majestic Metals</u>	<u>metal finishing</u>	<u>Phosphatizing and power paint</u>
<u>Spirit Manufacturing</u>	<u>metal finishing</u>	<u>Phosphatizing line</u>
<u>Thomas and Betts</u>	<u>metal finishing</u>	<u>Zinc electroplating</u>
<u>Trinity Lighting</u>	<u>metal finishing</u>	<u>Phosphatizing and painting</u> (wet and powder)
<u>Sun Ergoline</u>	<u>metal finishing</u>	<u>Phosphatizing line</u>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADPC&E OR EPA? Yes-Developed and adopted technically based local limits in May 1990. Made a change of Cu and Zn mass local limits to concentration by resolution in December 1993.
2. Describe any apparent problems with the local limits. None
3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
influent	1/quarter	1/quarter	N/A	
effluent	1/quarter	1/quarter	N/A	
sludge	1/quarter	1/quarter	N/A	
Organics:				
influent	1/year	1/year	N/A	
effluent	1/year	1/year	N/A	
sludge	N/A	N/A	N/A	

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective? None

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes-permit
2. How many IU permits (or other control documents) have been issued? 17 permits (plus 30 car washes)
3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.  
Yes
4. Does the control document contain the following items?  
An expiration date Yes  
Discharge limitations Yes

If the program requires self-monitoring by the IUs, do the permits contain No self-monitoring

IU self-monitoring requirements N/A

IU reporting requirements N/A

5. Indicate which of the following recommended standard conditions are contained in the control documents:

sample location Yes  
 type of sample Yes  
 monitoring frequency Yes  
 bypass prohibition Yes - vague  
 right of entry Yes  
 non transferability Yes  
 revocation clause Yes  
 penalty provisions Yes  
 slug load notification Yes  
 notification of process change Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>1/month to 2/year</u>	<u>2/year</u>
other SIUs	<u>daily to 2/year</u> <u>(IU specific)</u>	<u>2/year</u>
Inspection:		
categorical IUs	<u>1/year</u>	<u>1/year</u>
other SIUs	<u>1/year</u>	<u>1/year</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes

3. Are inspections announced or unannounced? ~1 day notice

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection Yes

Officials present Yes

Inspection of chemical storage areas Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams Yes

Inspection of the pretreatment facilities Yes - vague

Review of self-monitoring records N/A

Observation of IU self-monitoring procedures N/A

Verification that approved analytical techniques are used N/A

Verification of IU flow measurement (where required) No

6. Overall adequacy of inspection documentation:

Overall satisfactory; however the inspection report should provide more information regarding the condition and operation of the pretreatment facilities and/or equipment.

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY). Yes - Conventional and metals monthly all others 2/yr
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes
9. Are sampling and flow monitoring equipment properly maintained? Yes
10. Is the POTW keeping proper field notes and chain of custody forms? Yes
11. Is the sampling location representative of the discharge to the collection system? Yes
12. Are sampling locations identified in POTW records? Yes
13. Are sampling services available in an emergency? Yes
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Reports are tracked with computer program (AS400) The reports either go to the pretreatment specialist or the pretreatment coordinator for review and determination of completeness.
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? N/A- The city is doing all monitoring.
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? N/A for self-monitoring reports All violations are responded to with an NOV letter requiring a response - additional action taken as needed.



17. What are the POTW's procedures for following up violations?  
If a violation is found in a report the City will contact the IU by phone call and letter requiring a response. The next course of action depends on the violation.
18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? Do not use BMRs instead the information the on a BMR is obtained by using questionnaires and the permit application.

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR: No BMR's - use thorough user survey instead.

Name and address N/A

Other environmental permits held N/A

Description of operations N/A

Process flow diagrams N/A

Flow measurements N/A

Measurements of regulated pollutants N/A

Certification of compliance by the IU N/A

Compliance schedule (if needed) N/A

18. Additional comments on the POTW's inspection and sampling procedures: Overall satisfactory - the tubing on the composite sampler at Thomas and Betts was sagging thus preventing proper purging of the line

E. ENFORCEMENT

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes - 8 IUs had violations Thomas and Betts was the only significant violator

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2. How does the POTW respond to the following violations?

Effluent limitations Phone call followed by letter of notice of violation which requires a response.

Late reports Phone call followed by letter of notice of violation which requires a response.

Unpermitted discharges Phone call followed by letter of notice of violation which requires a response.

Slug loads or spills Phone call followed by letter of violation - Inspection if important to the WWTP

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes- Monday December 26, 2005 for Thomas and Betts.

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4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
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<u>Thomas and Betts</u>	<u>Zinc Local Limits</u>	<u>NOV (4 times)</u>	<u>12/05/2005</u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>

5. Comments on the POTW's enforcement procedures:  
It appears to be adequate. The pretreatment staff is much more familiar with the program and the enforcement procedures than at the last inspection.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program?  
Yes - matches the March 9, 2005 revision.
2. Are staffing levels adequate? Yes
3. Are the responsible officials familiar with the approved program? Personnel admit they are still learning but are much improved since the last inspection.

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:  
None
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area?  
N/A
3. Does the POTW have copies of permits for IUs in user cities?  
N/A
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators?  
N/A
4. Comments on multijurisdictional issues:  
None

H. EVALUATION AND COMMENTS

Overall much improved since the previous inspection.

The staff has a much better knowledge and understanding of the pretreatment program than was noted during the previous inspection. During the course of the inspection they were able to readily provide all requested documents and information.

All of the violations and/or deficiencies noted in the last inspection have either been addressed or are in the process of being corrected.

Some areas could use more detail such as inspection reports.

Spill reporting, clean-up and follow-up procedures should be closely examined at the Nestle Prepared Foods facility which is operated by CWL personnel.

Modification of the sampling setup at Thomas and Betts is recommended to remedy the sagging intake tubing.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Thomas and Betts Corporation

POTW Name: City Water and Light of Jonesboro

Industry Contacts: Alfred Davis/Engineer

Date and Time of Visit: April 13, 2006 @ 1520

Description of Manufacturing Process: Manufacturing of electrical conduit fittings including zinc plating and PVC coatings.

Sources of Process Wastewater:  
Parts cleaning and phosphatizing rinse

Categorical Industry? Yes

Basis for Limits: Federal regulations and technically based local limits

Point of Application: At discharge point to city system

Description of Pretreatment Equipment and Procedures:  
Chemical precipitation, solids filtration and pH adjustment.

Spill Prevention and Solvent Management Procedures:  
Written spill plan including notification of City Water & Light in the event of a slug load or spill. No floor drains in the facility.

Sampling Location and Equipment: Outside of plant along south wall with composite sampler provided and maintained by CWL.  
Note: This differs from the location in the permit and is in the process of being updated.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Nestle Prepared Foods

POTW Name: City Water & Light of Jonesboro

Industry Contacts: None - Inspected only the Pretreatment area of the facility which is operated by CWL - Steve Johnson

Date and Time of Visit: April 13, 2006 @ 1630

Description of Manufacturing Process: Produces Banquet and Lean Cuisine Frozen Entrees.

Sources of Process Wastewater:  
Food manufacturing, steam production, wash down, cleaning and sanitation.

Categorical Industry? No

Basis for Limits: Technically based local limits

Point of Application: At discharge point to city system.

Description of Pretreatment Equipment and Procedures:  
Two skimmers, 2 DAF unit, equalization basin

Spill Prevention and Solvent Management Procedures:  
Written spill plan including notification of City Water & Light in the event of a slug load or spill. No floor drains in the facility.

Sampling Location and Equipment: Separate pretreatment facility operated by CWL - Jonesboro. Composite sampler provided and maintained by CWL

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME	<u>Brent Walker &amp; Dale Washam</u>	
NAME OF FACILITY	<u>City Water and Light of Jonesboro</u>	
PERMIT NUMBER USED TO TRACK PROGRAM	<u>AR0037907</u>	NPID
DATE OF PCI	<u>April 13, 2006</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS)	<u>17</u>	SIUS
NUMBER OF CATEGORICAL IUS	<u>9</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING	<u>1</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW	<u>0</u>	SNIN





# POTW Pretreatment Program

## Industrial Site Visit

Name of Industry: Nestle Prepared Food

Industry Contacts: None – Inspected only the Pretreatment area of the facility which is operated by CWL – Steve Johnson

Type of Industry: Non-Categorical Food Products – Produces Banquet and Lean Cuisine Frozen Entrees

Date of Visit: April 13, 2006 \*\*\*Only the pretreatment portion of the facility was inspected – all evaluations were made at this location

- |  |   |  |   |
|--|---|--|---|
| 1. Significant industrial user:                        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> Not Determined           |
| 2. Pretreatment equipment or procedures?               | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A                      |
| 3. Pretreatment equipment maintained and operational?  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A                      |
| 4. Hazardous waste generated or stored?                | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A                      |
| 5. Proper solid waste disposal?                        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A                      |
| 6. Solvent management/TTO control?                     | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            | <input checked="" type="checkbox"/> N/A           |
| 7. Suitable sampling location?                         | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            | <input type="checkbox"/> N/A                      |
| 8. Appropriate self-monitoring procedures / equipment? | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            | <input checked="" type="checkbox"/> N/A           |
| 9. Adequate spill prevention?                          | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A                      |
| 10. Industry familiar with limits and requirements?    | <input type="checkbox"/> Yes            | <input type="checkbox"/> No            | <input checked="" type="checkbox"/> Not evaluated |

Additional Comments: Moderate size DAF skimmings spill by hauler had not been properly cleaned-up; otherwise the facility was clean and appeared well maintained and operated

Visit Conducted By: Brent L. Walker & Dale Washam Date: April 21, 2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

# NPDES Compliance Inspection Report

## Section A: National Data System Coding

Transaction Code			NPDES								yr/mo/day					Inspec. Type		Inspector		Fac Type																																																											
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<table border="1"> <tr> <td colspan="4">Inspection Work Days</td> <td colspan="4">Facility Evaluation Rating</td> <td colspan="2">BI</td> <td colspan="2">QA</td> <td colspan="10">Reserved</td> </tr> <tr> <td>67</td><td></td><td></td><td></td><td>69</td><td>70</td><td>N</td><td>71</td><td>N</td><td>72</td><td>N</td><td>73</td><td></td><td></td><td>74</td><td>75</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>80</td> </tr> </table>																												Inspection Work Days				Facility Evaluation Rating				BI		QA		Reserved										67				69	70	N	71	N	72	N	73			74	75														80
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## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>Thomas and Betts/CWL-Jonesboro/AR0043401</b> <b>5601 E. Highland Dr.</b> <b>Jonesboro, AR 72401</b>	Entry Time /Date <b>1520 04/13/2006</b>	Permit Effective Date <b>April 1, 2001</b>
	Exit Time/Date <b>1625 04/13/2006</b>	Permit Expiration Date <b>March 31, 2006</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Alfred Davis/Engineer/870-935-2559 ext.-285</b>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Doug Bryson/Plant Manager/870-935-2559 ext.-200</b> <b>P.O. Box 2280</b> <b>Jonesboro, AR 72401-2280</b>	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> Sampling
<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

**This facility was inspected during a pretreatment inspection on City Water and Light - Jonesboro, AR and has an active permit issued by the POTW (Permit #95-02)**

**Details are attached.**

Name(s) and Signature(s) of Inspector(s) <b>Brent L. Walker</b>	Agency/Office/Telephone/Fax <b>Arkansas Dept. of Environmental Quality/Jonesboro/ 870-935-7221 ext.-12/870-935-4715</b>	Date <b>April 21, 2006</b>
ddw		
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

# POTW Pretreatment Program

## Industrial Site Visit

Name of Industry: Thomas and Betts Corporation

Industry Contacts: Alfred Davis/Engineer

Type of Industry: Metal Finishing – Produce fittings for electrical conduit

Date of Visit: April 13, 2006

- |  |   |                             |   |
|--|---|-----------------------------|---|
| 1. Significant industrial user:                        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures?               | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A            |
| 3. Pretreatment equipment maintained and operational?  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A            |
| 4. Hazardous waste generated or stored?                | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A            |
| 5. Proper solid waste disposal?                        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A            |
| 6. Solvent management/TTO control?                     | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A            |
| 7. Suitable sampling location?                         | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A            |
| 8. Appropriate self-monitoring procedures / equipment? | <input type="checkbox"/> Yes            | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 9. Adequate spill prevention?                          | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A            |
| 10. Industry familiar with limits and requirements?    | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A            |

Additional Comments: 27% of sludge produce is Zn, 21% of sludge produced is Fe  
~400 employees

Several storm water deficiencies were noted and will be addressed in a future inspection

Visit Conducted By: Brent L. Walker & Dale Washam Date: April 21, 2006