DIVISION OF
ENVIRONMENTAL
QUALITY

October 17, 2024

Ms. Porsha Russell, Wastewater Manager
Clarksville Connected Utilities
1305 S. Crawford St.
Clarksville, AR 72830
Email Address: Porsha.Russell@clarksvilleconnected.net

RE: Clarksville PCI Inspection – PDS# 131755 (Johnson Co.)
AFIN: 36-00038 Permit No.: AR0022187

Dear Ms. Russell:

On 08/29/204, DEQ performed a Pretreatment Compliance Inspection of the above referenced 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. A copy of the inspection report is enclosed for your records.

Please refer to the Summary of Findings section of the inspection report and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each noted item. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e. photos) is due by **November 1, 2024**.

If I can be of any assistance, please contact me at Jason.Bolenbaugh@arkansas.gov or (501) 682-0659.

Sincerely,

Jason Bolenbaugh
Compliance Branch Manager, Office of Water Quality

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **36-00038**	PERMIT #: **AR0022187**	DATE: **8/24/2024**
COUNTY: **36 Johnson**	PDS #: **131755**	MEDIA: **WN**
GPS LAT:	LONG:	LOCATION: **************

FACILITY INFORMATION

NAME: **Clarksville PCI**

LOCATION: **1305 S. Crawford St.**

CITY: **Clarksville**

RESPONSIBLE OFFICIAL

NAME / TITLE: **Ms. Porsha Russell / Wastewater Manager**

COMPANY: **Clarksville Connected Utilities**

MAILING ADDRESS: **1305 S. Crawford St.**

CITY, STATE, ZIP: **Clarksville AR 72830**

PHONE & EXT: / FAX: **479-774-6241 /**

EMAIL: **Porsha.Russell@clarksvilleconnected.net**

CONTACTED DURING INSPECTION: **Yes**

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**

INSPECTOR ID#: **83321 S - State**

FACILITY EVALUATION RATING: **4 - Satisfactory**

INSPECTION TYPE: **Pretreatment Compliance**

DATE(S): **8/24/2024**

ENTRY TIME: **10:00**

EXIT TIME: **13:15**

PERMIT EFFECTIVE DATE: **11/1/2020**

PERMIT EXPIRATION DATE: **10/31/2025**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:

Ms. Porsha Russell, Wastewater Manager, CCU
Mr. Alan Anderson, Pretreatment Coordinator, DEQ

AREA EVALUATIONS

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

**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

At the time of the inspection the following was noted:

1. **The Industrial User (IU) Survey hasn't been updated since at least 2014. Ms. Russell was working on updating the survey and plans to request a new IU survey with each permit renewal. Part II.8.A.1 of the permit requires IU information be updated at a frequency adequate to ensure that all IUs are properly characterized at all times. Please provide a date in which the IU survey updates will be completed.**

GENERAL COMMENTS

Below are general comments of permit conditions that were made during the PCI. As part of the PCI, two IU inspections were conducted at Greenville Tube Corporation (GTC) and Pictsweet.

Clarksville Connected Utilities (CCU) Comments

1. **The permittee inspects and samples each SIU in accordance with 40 CFR 403.8(f)(2)(v).**
2. **The permittee enforces and obtains remedies for noncompliance issues.**
3. **All permits are issued by CCU to the SIUs are active and comply with Part II.8.A.4 of the permit.**
4. **Per Part II.8.B of the permit, the permittee submitted, on November 4, 2020, a written certification demonstrating the existing technically based local limits (TBLLs) were based on current state water quality standards.**
5. **The permittee analyzes the POTWs influent and effluent for toxic pollutants in accordance with Part II.8.C of the permit and 40 CFR 122.**
6. **Per Part II.D of the permit, the permittee prepares annual Industrial User reports and submits those timely to the DEQ-OWQ Pretreatment Coordinator.**

Pictsweet Comments – See IU inspection (PDS# 131757) for details of the facility.

1. **CCU issued Permit 001 on June 1, 2023. The permit expires on May 31, 2028.**
2. **The facility is a food processing facility where raw, whole sweet potatoes are washed, steamed, peeled, cut, and cooked.**
3. **Pictsweet is a non-Categorical IU and the last SIU to be found in significant non-compliance.**
4. **Environmental permits consist of ARG250001, ARR00A209, and ARD064171952.**

Greenville Tube Corporation Comments – See IU inspection (PDS# 131756) for details of the facility.

1. **CCU issued Permit 06 on February 1, 2024. The permit expires on January 31, 2029.**
2. **GTC is a Categorical SIU (metal finisher) where metal tubes are produced from stainless steel piping.**
3. **Environmental Permits consists of ARR00A004 and ARR000014027.**

INSPECTOR'S SIGNATURE: ←Click text to left to add signature **-Inspector Name**	DATE:
SUPERVISOR'S SIGNATURE: **Jason Bolenbaugh**	DATE: **10/14/2024**

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. **One. According to the annual report submitted on February 4, 2024, Hanesbrands stopped production and moved from the building in September 2023. A Tyson plant is scheduled to be added near the end of 2024.**
2. Has ADEQ or EPA been notified of these changes? **Yes.**
3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? **The IU survey has not been updated since at least 2014. Ms. Russell is currently working on updating the survey. However, per Part II, Condition 8.A.1, the POTW requires the IUs to submit a new IU survey during permit renewal.**
4. What procedures are being used to update the IU Survey? **Ms. Russell is evaluating the survey in preparation of making revisions.**
5. Total number of Significant Industrial Users, according to the definition used by the POTW: **2, Greenville Tube and Pictsweet**
6. Number of Categorical Industrial Users: **1, Greenville Tube Corporation (GTC of Clarksville, LLC)**
7. How does the POTW determine the appropriate categorical standards to apply to an IU? **40 CFR 433, IU Survey, IU Permit Application**
8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (i.e. Metal Finishing), and the regulated process (i.e. phosphating, zinc plating, etc.). Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
GTC	**40 CFR 433.17**	**Metal Finishing**

B. LOCAL LIMITS

1.IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? **The POTW is not applying local limits.**

2. Describe any apparent problems with the local limits. **Not applicable at this time.**

3. How often are pollutant scans of POTW influent and effluent performed by the POTW? Does this fulfill the requirements of the approved program and Part II, Condition 8.C of the NPDES permit?

Pollutant:	**Sampling Frequency**	**Permit Requirement**	**Program Requirement**
Metals:			
Influent:	**4/year**	**4/year**	**4/year**
Effluent:	**4/year**	**4/year**	**4/year**
Organics:			
Influent:	**Annually**	**Annually**	**Annually**
Effluent:	**Annually**	**Annually**	**Annually**

Comments: **Reviewed 2021-2023 annual reports. Table II influent was typically sampled first, and the effluent sampled a day or two after. All samples collected according to the required frequency.**

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 POTW to ensure that the incident would not recur. Were these actions effective? **None. The POTW had minor impacts due to discharged effluent from Pictsweet that were high in BOD and TSS. However, this issue did not result in any upsets or effluent violations at the POTW.**

C. INDUSTRIAL USER CONTROL MECHANISM
1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? **The POTW issues permits to the IUs.**
2. How many IU permits (or other control documents) have been issued? **2**
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. GTC's permit expires on 1/31/2029, and Pictsweet's permit expires on 5/31/2028.**
4. Does the control document contain the following items? List the section of the permit each item is listed under. **The permit for GTC was reviewed for this section.**
An expiration date: **01/31/2029**
Discharge limitations: **Section A**
If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under.
IU self-monitoring requirements: **Section A. Frequency varies based on effluent characteristic.**
IU reporting requirements: **Section A (monthly)**
5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under.
Sample location: **Section A: samples must be taken from the discharge point of the passivator rinse tank.**
Type of sample: **Section A. 24-hour composite and grab samples, depending on effluent characteristic.**
Monitoring frequency: **Section A. Monthly or bi-annually depending on the effluent characteristic.**
Bypass prohibition: **Section C.3**
Right of entry: **Section D.6**
Non-transferability: **Section B.6**
Revocation clause: **Section B.4**
Penalty Provisions: **Section B.2**
Slug load notification: **Section F.5**
Notification of process change: **Section E.1**

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below (Part II, Condition 8.A.2 and 40 CFR 403.8(f)(2)(v)).

	Current frequency:	Program Requirements:
Sampling:		
Categorical IUs	**1-2/year**	**Annually**
Other SIUs	**1-2/year**	**Annually**
Non-SIUs	**NA**	**NA**
Inspection:		
Categorical IUs	**Annually**	**Annually**
Other SIUs	**Annually**	**Annually**
Non-SIUs	**NA**	**NA**

Comments: **Reviewed 2021-2023 annual reports. In 2021 and 2022 the permittee conducted two sampling inspections/year.**

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

3. Are inspections announced or unannounced? **Mostly an advanced notice is given, but Ms. Russell may not provide the date she will be inspecting.**

4. Are records kept of each inspection? **YES.**

5. Does the inspection report contain an adequate description of the following: **Reviewed GTC's, September 20, 2023, inspection report.**

Date and time of inspection: **September 20, 2023**

Officials present:
Porsha Russell and Connor Cagle, City of Clarksville
Jim Roberts, GTC

Inspection of chemical storage areas:

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: **Metal tubes are produced at the facility where tubing is drawn, annealed, degreased, straightened, cut to length, sand blasted, polished, and passivated.**

Inspection of the pretreatment facilities: **The report notes "All pretreatment system seems to be in good operating condition. Caustic soda is on spill proof pallet." The pH calibration log sheet is checked by the inspector.**

Review of self-monitoring records: **Yes. Parameters sampled and analyzed by the Environmental Enterprise Group (EEG) are Cadmium, Chromium, Copper, Lead, Silver, Zinc, Cyanide, pH, Oil & Grease, and Temperature. The inspector reviews the records, COCs, analytical results, and testing methods.**

Observation of IU self-monitoring procedures: **Yes.**

Verification that approved analytical techniques are used: **Yes.**

Verification of IU flow measurement (where required): **Yes, noted meter**

replacement.
6. Please describe the overall adequacy of inspection documentation: **The inspection is complete and includes a summary of the inspection and recommended actions for the IU staff to take. It includes general information of the facility, and specific information regarding the waste stream generation, pretreatment facility, records and laboratory reports, and spill and discharge prevention.**
7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? **Yes.**
8. Are analyses performed in accordance with EPA approved methods (40 CFR 136)? **Yes. Samples collected at Greenville Tube in April 2023, are sent to Europhins for analysis.**
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, Ms. Russell has the sampling equipment if necessary.**
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? **Each industry has a spreadsheet in which Ms. Russell writes the date received and results of any report.**
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? **Yes.**
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? **Yes, she sends each facility a Notice of Violation letter.**
17. What are the POTW's procedures for following up violations? **Effluent violations are resampled, and she receives the results.**

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? **She didn't find any BMR on file and utilizes the applications as a substitute.**
Review a Baseline Monitoring Report from the POTW's file and indicate which of the following items can be identified in the BMR. **GTC**
Name and address: **501 S. Montgomery St.**
Other environmental permits held: **ARG250001, ARR00A004, 0161-AR-3.**
Description of operations: **Stainless steel pip is drawn down, degreased, annealed, straightened, sand blasted, and cut to length.**
Process flow diagrams: **Yes.**
Flow measurements: **Yes.**
Measurements of regulated pollutants: **Yes.**
Certification of compliance by the IU: **No.**
Compliance schedule (if needed): **Not needed.**
19. Additional comments on the POTW's inspection and sampling procedures: **Inspections and sampling procedures are adequate.**

E. Enforcement
1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? **Ms. Russell believes the enforcement procedures and permits in place are satisfactory. Ordinance 10.04.14 contains enforcement procedures.**
2. How does the POTW respond to the following violations?
Effluent limitations: **Response depends on nature of effluent limit violation and whether damage to the POTW occurred or environmental effect. Range of actions: Phone call, informal letter, NOV, compliance meeting, AO, show cause, consent order, etc.**
Late reports: **Response depends on nature of reporting violation. Range of actions: Phone call, informal letter, NOV, AO, meeting, show cause, civil action, etc.**
Unpermitted discharges: **Stop the discharge immediately. Response depends on nature of unpermitted discharge violation and whether damage to the POTW occurred or environmental effect. Range of actions: Phone call, informal letter, NOV, AO, require permit app, wastewater analysis, etc.**
Slug loads or spills: **Communicates with the facility and she inspects the problem. Will write a letter acknowledging the problem. Would receive a NOV letter and potentially be surcharged.**
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)? **Pictsweet was the last and it has been more than 3 years. But SNC violators are published in the paper.**
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. **No SIUs have been in significant non-compliance status in the last 12 months.**
5. Comments on the POTW’s enforcement procedures: **They are adequate.**

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE
1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Ms. Russell and Mr. Connor Cagle. Another operator may be requested to look at one of the SIUs if Ms. Russell is not available.**
2. Are staffing levels adequate? **Yes.**
3. Are the responsible officials familiar with the approved program? **Yes.**
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? **Not applicable.**
3. Does the POTW have copies of permits for IUs in other cities? **Not applicable.**
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? **Not applicable.**
5. Comments on multijurisdictional issues: **None.**

Jason Bolenbaugh (adpce.ad)

From: Russell, Porsha <Porsha.Russell@clarksvilleconnected.net>
Sent: Thursday, October 17, 2024 12:16 PM
To: Uniqika.Marshall@adeq.state.ar.us; Jason Bolenbaugh (adpce.ad)
Subject: Industrial pretreatment AR0022187
Attachments: Nonresidential Wastewater Survey.docx

Dear Ms. Marshall and Mr. Bolenbaugh:

I have received your inspection report on my facility, and I have been in the process of updating the industrial user surveys. Please find attached the IU Survey form that I have updated from the one that was previously used and in our pretreatment program that was last updated in 2014. Is the form that I have attached acceptable to use presently? Please advise. If the new survey is acceptable, I will get these out to my industries as soon as possible.

Thank you,

Porsha Russell
Wastewater Manager
(479) 774-6241

CLARKSVILLE
CONNECTED UTILITIES

Clarksville Connected Utilities
Wastewater Department
Pretreatment Program
non-residential Wastewater Survey

This survey is intended to obtain information needed by Clarksville Connected Utilities (CCU) to comply with state and federal Pretreatment requirements. Failure to submit a complete and accurate survey may result in penalties including the termination of service. CCU may verify the data submitted through phone calls, site inspection, and sample analysis. Answer each question accurately to reflect existing conditions and conditions proposed to occur within 3 to 5 years. Attach additional sheets as necessary.

Directions for Completing this Industrial Waste Survey Form

1. Fill out industrial waste survey form completely. Answer all questions. If you do not know the answer to a question, write "Unknown" in the box. If an answer is not applicable to your facility, write "N/A".
2. Sign the industrial waste survey form (see last page). Must be signed by an Authorized Representative of the Industrial User.
3. Failure to submit a complete Industrial Waste Survey form or to submit the form *within thirty (30) business days* is a violation of the City's Ordinance 12-651
4. Fill out using ink. Do not use a pencil. Write clearly.
5. If you have any questions, please contact Clarksville Connected Utilities' Pollution Control Facility at: 479-705-0811

General Information

Company Name and d.b.a. Business Name, if different	
Name of responsible person at the facility authorized to represent the company in official dealings with CCU.	
Title:	Phone:
Non business hours contact:	Phone:
Email Address (if available):	Physical Street Address of Facility:
Website (if available):	Official Mailing Address if Different:
Number of days of operation:	Number of hours per day of operation:
NAICS/SIC code:	Does your business currently have a notional pollutant discharge elimination system (NPDES) permit: Yes☐ No☐
If you have a NPDES permit, what is the identifying number?	

WATER USAGE INFORMATION

Current Water usage (gallons per month):	Current Wastewater discharged (gallons per month)
Do you expect a change in water usage in the next five years?	Yes☐ No☐
If so, what changes do you anticipate?	
Of the amount of wastewater discharged what percent is related to production activities (i.e. process water, cooling towers,etc.)?	Percent domestic wastewater (i.e. bathrooms)
Will there be a water source used other than city water? Yes☐ No☐	If so, what is the source (i.e. private well)

Check Any and All Activities Occurring at Your Location	
☐ Aircraft Repair/Maintenance	☐ Brewery
☐ Treating Waste from Other Businesses	☐ Industrial Laundry (other than neighborhood laundry)
☐ Copper or Aluminum Forming	☐ Dairy Products Manufacturing
☐ Dental Services	☐ Fertilizer Manufacturing
☐ Electrical Component Manufacturing	☐ Firearms - Bluing
☐ Grocery –Retail With Deli	☐ Grocery – Retail Without Deli
☐ Hospital	☐ Medical (other than hospital)
☐ Leather Tanning	☐ Meat, Vegetable or Food Processing (factory level, not restaurants)
☐ Trucked & Hauled Waste (including domestic septic tanks, sand traps, commercial or industrial waste)	☐ Metal Finishing (including electroplating, electroless plating, anodizing, coloring, coating, acid rinse or acid cleaning prior to painting, chemical etching, etc.)
☐ Non Ferrous Metals Forming	☐ Metal Molding and Casting
☐ Oil & Grease Refining/Extraction	☐ Paint/Ink Manufacturing
☐ Painting of Metal	☐ Photographic/X-Ray Developing
☐ Plastics Manufacturing	☐ Porcelain Enameling
☐ Printing/Publishing	☐ Restaurant
☐ Retail Sales Only	☐ Smelting/Metal Refining
☐ Soap or Detergent Manufacture	☐ Steam Power Generation
☐ Wood Preservation	☐ Transportation Equipment Cleaning
☐ Vehicle Repair Shop/Garage	☐ Warehouse
☐ Other:	☐ Other:

SECTION 1

Waste Discharge Check all types of operations and wastewater generated at this site:	
☐ Air Pollution Equipment	☐ Medical/Dental Services
☐ Anodizing	☐ Metal Coating (chromating, phosphating, coloring)
☐ Beverage Bottling	☐ Pesticide Application Service
☐ Boiler/Cooling Blowdown	☐ Photographic/Film/X-ray Processing
☐ Chemical Etching or Milling	☐ Plastics Processing
☐ Cooling Water, Contact	☐ Powder Coating
☐ Cooling Water, Non-contact	☐ Printed Circuit Board Manufacturing
☐ Domestic Waste	☐ Printing & Publishing
☐ Electroless Plating	☐ Process Water
☐ Electroplating	☐ Slaughter/Meat Packing/Rendering
☐ Equipment Manufacturing	☐ Vehicle or Equipment Maintenance/Repair
☐ Fertilizer Application Service	☐ Vehicle or Equipment Washdown
☐ Food Processing	☐ Waste Recycling
☐ Food Service Establishment	☐ Water Treatment
☐ Groundwater Treatment	☐ Wood Preserving
☐ Laundry	☐ Other:

Will you use fats, oil, grease (cooking or petroleum), or dairy products in your business?	Yes☐	No☐
Will liquid, gaseous, or sludge waste be generated but not discharged to the sanitary sewer?	Yes☐	No☐
If "Yes", please provide your company practices:	Onsite Storage ☐ Offsite Storage☐	Onsite Disposal ☐ Offsite Disposal☐
Describe the method of storage/disposal of these wastes, including names of all waste haulers used.		

WASTEWATER PRETREATMENT		
Is your wastewater treated prior to discharge to the sanitary sewer? (If so, mark all that apply.)	Yes☐	No☐

☐ pH Adjustment	☐ Filtering	☐ Metals Treatment
☐ Sand/Sedimentation Tank	☐ Food Grinder/Garbage Disposal	☐ Biological Treatment
☐ Flow Equalization	☐ Other(Please Explain):	

WASTE DISCHARGE (CONTINUED)			
Will there be a garbage disposal unit (food grinder) at your business?	Yes☐	Qty:	No☐
Are there any floor drains in areas other than restrooms?	Yes☐	Qty:	No☐
Will you generate hazardous waste as defined by ADEQ and federal regulations (RCRA)?	Yes☐	Generator Status:	No☐
Will you discharge any RCRA listed or characteristic hazardous wastes to the sanitary sewer?	Yes☐	Waste Description:	No☐

Will there be an interceptor, separator, or other device installed to pretreat your wastewater prior to discharge? (If so, check all that apply below.):	Yes☐	No☐
☐ Amalgam Separator: ☐wet ring ☐dry vacuum pump system	☐ Hair Trap	☐ Other (List):
☐ Amalgam Chairside Trap	☐ Lint Trap	☐ Other (List):
☐ Grease Interceptor, Inside	☐ Oil/Water Separator	☐ Other (List):
☐ Grease Interceptor, Outside	☐ Sand Interceptor	☐ Other (List):
Does a waste hauler pick-up any chemicals or liquid wastes from your facility?	Yes☐	No☐
If yes, please list what is picked up and by whom:		

SECTION 2

CATEGORICAL INDUSTRY			
Is this facility a categorical industry as defined by 40 CFR 403 through 40 CFR 471? (If "Yes" check the appropriate category below)	Yes ☐	No ☐	Unknown ☐

☐ Aluminum Forming	☐ Metal Finishing
☐ Battery Manufacturing	☐ Metal Molding or Casting
☐ Builders' Paper and Board Mills	☐ Nonferrous Metals Forming or Metal Powders
☐ Carbon Black Manufacturing	☐ Nonferrous Metals Manufacturing
☐ Coil Coating	☐ Organic Chemicals, Plastics & Synthetic Fibers Man.
☐ Copper Forming	☐ Paint Formulating
☐ Electrical or Electronic Component	☐ Paving or Roofing Materials (Tar & Asphalt)
☐ Electroplating	☐ Pesticide Chemicals
☐ Feedlot	☐ Petroleum Refining
☐ Fertilizer Manufacturing	☐ Pharmaceutical Manufacturing
☐ Glass Manufacturing	☐ Porcelain Enameling
☐ Grain Mill	☐ Pulp, Paper, or Fiberboard Manufacturing
☐ Ink Formation	☐ Rubber Manufacturing
☐ Inorganic Chemicals Manufacturing	☐ Soaps or Detergent Manufacturing
☐ Iron & Steel Manufacturing	☐ Steam Electric Power Generating
☐ Leather Tanning & Finishing	☐ Timber Products Processing

CHEMICAL INFORMATION		
Will/Do you use EPA Toxics Release Inventory (TRI) chemicals in reportable quantities?	Yes ☐	No ☐
Will you store chemicals at your facility in a volume greater than 5 gallons each? (If yes, attach a description of the chemical, container size and type, storage location, frequency and method of container cleaning/disposal.	Yes ☐	No ☐
Has your company ever been issued a local, state, or federal environmental permit? (i.e. Air, Water, HazWaste, etc.) If "Yes" list the permit(s) type and Permit(s) number:	Yes ☐	No ☐

Does your business activities use, generate, or dispose of any of the following chemicals?	Yes	No	Discharged/Disposed of to Sanitary Sewer?	Where disposed of if not to Sanitary Sewer?
Antifreeze/Glycol Compounds	☐	☐	Yes☐ No☐	
Petroleum Grease/Oils	☐	☐	Yes☐ No☐	
Vegetable Grease/Oils	☐	☐	Yes☐ No☐	
Acids/Corrosives	☐	☐	Yes☐ No☐	
Food Wastes	☐	☐	Yes☐ No☐	
Solvents (incl. cleaning solvents)	☐	☐	Yes☐ No☐	
Flammables/Explosives	☐	☐	Yes☐ No☐	
Pesticides/Herbicides	☐	☐	Yes☐ No☐	
Phenols	☐	☐	Yes☐ No☐	
Cyanides	☐	☐	Yes☐ No☐	
Metals/Metal Solutions	☐	☐	Yes☐ No☐	
Nitrogen Containing Compounds	☐	☐	Yes☐ No☐	
Organic Chemicals	☐	☐	Yes☐ No☐	
Hazardous Waste	☐	☐	Yes☐ No☐	
Radioactive Isotopes	☐	☐	Yes☐ No☐	
Trucked or Hauled Waste	☐	☐	Yes☐ No☐	
High Temperature Waste	☐	☐	Yes☐ No☐	
Sulfide/Hydrogen Sulfide Generating Waste	☐	☐	Yes☐ No☐	
High Total Dissolved Solids (TDS)	☐	☐	Yes☐ No☐	

SECTION 3

SIGNATURE SECTION

The Authorized Representative for the Business shall sign this survey and return it within thirty (30) days to:

Clarksville Connected Utilities
Pollution Control Facility
P.O. Box 1807
Clarksville, AR 72830

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment for knowing violations."

____
Printed Name of Authorized Representative from Page 1

____
Title

____
Signature of Authorized Representative from Page 1

____
Date

The signing official must have authorization to provide such information on behalf of the company, corporation or partnership. In accordance with Arkansas law, information and data provided in the questionnaire may be available for public review under the Freedom of Information Act. Requests for confidential treatment of the information will be governed by procedures specified by the City's Pretreatment Program and the Freedom of Information Act.

DIVISION OF
ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR
Shane E. Khoury
SECRETARY

10/18/2024

Ms. Porsha Russell, Wastewater Manager
Clarksville Connected Utilities
1305 S. Crawford St.
Clarksville, AR 72830
Email Address: Porsha.Russell@clarksvilleconnected.net

RE: Adequate Response to Inspection PDS# 131755
AFIN: 36-00038 Permit No.: AR0022187

Dear Ms. Russell:

I have reviewed the response pertaining to my Pretreatment Compliance Inspection of the Clarksville Connected Utilities. The information provided sufficiently addresses the items referenced in my inspection report. At this time, the Division has no further comment concerning this inspection. Acceptance of this response by the Division does not preclude any future enforcement action deemed necessary at this site or any other site.

If I require further information concerning this matter, I will contact you. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 682-0659 or you may email me at Jason.Bolenbaugh@arkansas.gov.

Sincerely,

Jason Bolenbaugh
Compliance Branch Manager, Office of Water Quality