



CITY OF
Siloam Springs
It's a natural

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January 23, 2014

USPS-CERTIFIED MAIL RETURN RECEIPT REQUESTED

Teresa Marks, Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

**Re: City of Siloam Springs NPDES Permit No. AR0020273
Notice of New Introduction of Pollutants into Treatment Works**

Dear Director Marks,

Pursuant to Conditions II.D.1 and III.8.e. of the City's NPDES Permit No. AR0020273 this is notice of a new introduction of pollutants into the City's treatment works.

The City has issued the attached Authorization 2014-01 for Discharge of Hauled Industrial Wastewater to Allens, Inc. in accordance with the requirements of the City's Industrial Pretreatment Ordinance section 98-737.

Authorization 2014-01 allows Allens, Inc. to discharge up to 150,000 gallons per day of wastewater from vegetable preparation and canning operations. After the City has determined the POTW's response as a result from the increased organic loading, the City may allow for additional increases up to 500,000 gallons per day. The parameters and concentrations of parameters in the wastewater are provided in the most recently tested attached laboratory analyses from Environmental Services Company. Allens, Inc. has represented to the City that these analyses are representative of the wastewater that will be discharged to the City collection and treatment system under the Authorization.

Authorization 2014-01 requires Allens, Inc. to comply with the City's Industrial Pretreatment Ordinance and imposes limits on parameters in the Allens, Inc. wastewater that are necessary to protect the City's treatment works from pass through and interference, comply with federal, state, and local limits, and protect the City's ability to comply with effluent limitations in the City's NPDES Permit. The City has evaluated the proposed discharge with regard to solids and sludge handling and has determined that the terms of the Authorization protect the City's ability to properly handle solids and sludge in compliance with applicable requirements.

Director Marks
January 23, 2014
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Allens, Inc. discharges will be monitored as provided in the Authorization. The Authorization provides the City the ability to make changes in the discharge requirements as needed and sets forth the consequences of failure to comply by Allens, Inc.

Please contact me if you have any questions regarding this notice.

Sincerely,

A handwritten signature in black ink, appearing to read "David Cameron", with a stylized flourish extending to the right.

David Cameron
City Administrator

Enclosure: Originally signed City of Siloam Springs Authorization 2014-01
Laboratory Analyses from Environmental Services Company (2 pages)

cc: Allen Gilliam (ADEQ) (with copy of signed Authorization 2014-01 only)
NPDES Enforcement Section (ADEQ) (with copy of signed Authorization 2014-01 only)

COPY

CITY OF SILOAM SPRINGS

INDUSTRIAL PRETREATMENT PROGRAM

AUTHORIZATION FOR DISCHARGE OF HAULED INDUSTRIAL WASTEWATER

JANUARY 22, 2014

Pursuant to section 98-737 of the City's Industrial Pretreatment Ordinance Allens, Inc. is authorized to discharge in accordance with this Authorization and other requirements which may from time to time be imposed by the City Administrator, hauled industrial wastewater to the City's sewer collection system for treatment in the City's POTW.

The discharge authorized is industrial wastewater directly from the Allens, Inc. vegetable processing and canning Plant #1, 14961 Readings Road, Siloam Springs, AR. This City will only accept process wastewater from the "Lagoon Pump Inlet for Tanking". Lagoon or other stored or otherwise collected wastewater shall not be discharged under this Authorization. Waste directly from the lagoon is of differing consistency and would require different Authorization for discharge. Allens, Inc. has provided the City a comprehensive analysis of the wastewater to be discharged and has represented that the wastewater to be discharged shall not deviate significantly from that baseline analysis and has further represented that there is not hazardous waste in the wastewater to be discharged.

The discharge is subject to the following requirements:

1. The discharge is subject to all requirements of the City's Industrial Pretreatment Ordinance, a copy of which has been provided to Allens, Inc.
2. Allens, Inc. will begin by delivering 150,000 gallons daily for the first three (3) days of start of discharge to allow the City system to adapt to additional organic loading. Upon written amendment of this Authorization which will be sent via electronic mail, the City may authorize larger volumes on an increasing daily basis. If at any time there is a negative impact on the operation of the City's Publicly Owned Treatment Works the City may require a decrease in discharge authorized or may revoke this Authorization or the Authorization as amended.
3. In addition to all requirements in the City's Industrial Pretreatment Program, the discharge is subject to the discharge limits set forth in this Authorization. At no time may all or any portion of a discharge exceed the discharge limits. If such exceedance occurs, the discharge shall cease immediately pursuant to notice by the City Administrator or the City's Water and Wastewater Director and shall not resume without written authorization from the City Administrator.
4. The discharge shall be made from 7,000 gallon or less truckloads. The discharge shall be pumped to the manhole located at the City Solid Waste Department located at 1108 East Ashley.

5. If any material is spilled or otherwise not discharged directly to the manhole, Allens Inc. shall be solely responsible for notification of such spill and for any cleanup or other requirements as a result of the spill and for all legal obligations associated with such spill.
6. Allens, Inc may discharge daily between the hours of 7:00 am and 10:00 pm. Notice shall be to the City Water and Wastewater Director at 479-238-0935 and sgorszczyk@siloamsprings.com of any reduction in the volume allowed under this Authorization or this Authorization as amended.
7. Allens, Inc. shall provide BOD, TSS, TKN, Phosphorus, and total recoverable Copper every three (3) days. Such analysis must be received within three business days following the sample day except for BOD which will be allowed seven business days. Analysis must be performed at a certified laboratory conforming to regulations per 40 CFR Part 136.
8. The City may sample any load at any time. The City will invoice Allens, Inc. the charges for collection and analysis of such samples. Such invoice shall be paid within 30 days of the date of the invoice.
9. Discharge limits are as follows:
 - a. BOD = 5,000 ppm
 - b. TSS = 2,500 ppm
 - c. Phosphorus = 16 ppm
 - d. Copper = 15.84 ug/L
 - e. TKN = 25 ppm
10. Charges for the discharge of wastewater are as follows:
 - a. BOD – the following fees apply at all times:
 - i. BOD up to 1000 ppm = \$.045 per gallon
 - ii. BOD up to 2000 ppm = \$.055 per gallon
 - iii. BOD up to 3000 ppm = \$.065 per gallon
 - iv. BOD up to 4000 ppm = \$.085 per gallon
 - v. BOD up to 5000 ppm = \$.10 per gallon

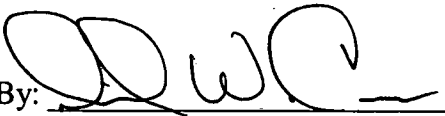
Charges shall be assessed daily by electronic invoice from the City and based upon the load information recorded from the previous day on the Hauled Wastewater Tracking Forms. The Hauled Wastewater Tracking Forms shall be submitted to the City by 9:00 am each weekday. Weekend volumes must be emailed on the following Monday prior to 9:00 am. The City's Finance Director, Christina Petriches cpetriches@siloamsprings.com 238-0947 shall submit a daily invoice to Allens, Inc. financial representative, Mark Towery, mtowery@allens.com for a daily wire transfer for the previous day's volume. Allens, Inc. shall provide wire transfer by end of the business day. The City will stop accepting waste loads if the payment is not made.

11. If Allens, Inc. fails to comply with any requirement in this Authorization the City Administrator may revoke this authorization without prior notice. Any noncompliance with this Authorization or

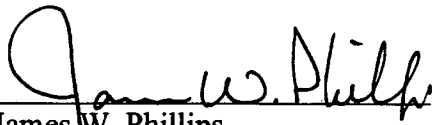
the City's Industrial Pretreatment Ordinance shall be subject to enforcement as provided in the Industrial Pretreatment Ordinance.

12. This Authorization and compliance with this Authorization does not relieve Allens, Inc. of its obligation to comply with any applicable federal, state or local laws.

13. This Authorization is effective January 23, 2014 and shall expire at midnight March 28, 2014.

By: 
David W. Cameron
City Administrator

Date: 1/23/14

By: 
James W. Phillips
Executive Vice President HR / Legal
Allens, Inc.

Date: 1/23/14

Environmental Services Company, Inc.

Corporate Office
13715 West Markham
Little Rock, AR 72211
Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
1107 Century Avenue
Springdale, AR 72762
Tel. (479)750-1170 Fax (479)750-1172

| | | |
|---|--------------------------------|-------------------|
| Control Number: 1311020378 | Sample Date : 11/25/13 | Collected By: WDS |
| Customer Name : ALLEN CANNING CO-IRRIGATION WTR | Sample Time : 1110 | Delivery By : WDS |
| Customer Number : 1381 | Sample Type : GRAB IRR. WATER | Work Order : |
| Report Date : 12/11/13 | Sample From : IRRIGATION WATER | Purchase Order : |

| <u>Laboratory Analysis</u> | | | | | | <u>Quality Assurance</u> | | | |
|----------------------------|-------------|-----------|---------------------------|----------------|--------------|--------------------------|--------------------|------------------|-------|
| <u>Analysis</u> | | | | | | <u>Precision</u> | <u>Accuracy</u> | | |
| <u>Date</u> | <u>Time</u> | <u>By</u> | <u>Parameter</u> | <u>Result</u> | <u>Notes</u> | <u>Quantity</u> | <u>Method</u> | | |
| | | | | | | | <u>% RPD</u> | <u>% Recover</u> | |
| 12/02 | 1000 | TSB | Ammonia Nitrogen | 3.5 mg/L | | | SM 18th 4500-NH3 H | 0.94 | 80.0 |
| 12/02 | 0800 | TSB | Kjeldahl Nitrogen Total | 39.20 mg/L | | | SM 18th 4500-NorgB | 1.68 | 100.9 |
| 12/04 | 1219 | RAH | Potassium | 133.8100 mg/L | | | EPA 200.8 | 0.27 | 98.8 |
| 11/25 | 1110 | WDS | pH | 4.3 S.U. | | | SM 18th 4500-H+ B | 0.00 | N/A |
| 12/02 | 0830 | TSB | Phosphorous, Total (as P) | 8.8 mg/L | | | EPA 365.3 | 2.99 | 98.6 |
| 11/27 | 1100 | KIK | Solids, Total Dissolved | 4323.3 mg/L | | | SM 18th 2540C | 4.88 | N/A |
| 11/25 | 1330 | KIK | Solids, Total Suspended | 490.0 mg/L | | | SM 18th 2540D | 0.00 | N/A |
| 12/02 | 1620 | KIK | Solids, Total | 3160.0 mg/L | | | SM 18th 2540B | 1.90 | N/A |
| 11/25 | 1110 | WDS | Specific Conductance | 3780.00 U MHOS | | | EPA 120.1 | 0.00 | N/A |
| 12/02 | 1345 | KIK | Chloride | 509.98 mg/L | | | SM 18th 4500-Cl C | 6.06 | 109.6 |
| 11/27 | 0830 | KIK | BOD, Carbonaceous | 5640.0 mg/L | | | SM 18th 5210B | 0.00 | 103.5 |
| 12/02 | 1620 | KIK | Solids, % Total | 0.527 % | | | SM 18th 2540G | 4.75 | N/A |
| 12/03 | 1000 | TSB | Nitrate + Nitrite | 0.3 mg/L | | | SM 18th 4500-NO3 E | 0.00 | 98.6 |

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature _____

Environmental Services Co., Inc.

Environmental Services Company, Inc.

Corporate Office
13715 West Markham
Little Rock, AR 72211
Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
1107 Century Avenue
Springdale, AR 72762
Tel. (479)750-1170 Fax (479)750-1172

| | | |
|---|---------------------------------|-------------------------------|
| Control Number: 1401020200 | Sample Date : 01/13/14 | Collected By: LAURA MUSHINSKI |
| Customer Name : ALLEN CANNING CO-IRRIGATION WTR | Sample Time : 1320 | Delivery By : LAURA MUSHINSKI |
| Customer Number : 1381 | Sample Type : GRAB - WASTEWATER | Work Order : |
| Report Date : 01/21/14 | Sample From : LAGOON | Purchase Order : |

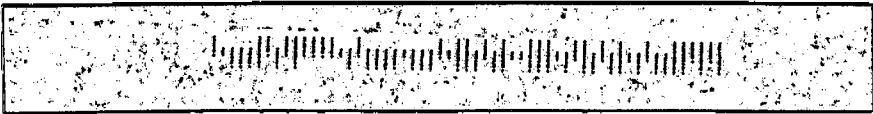
| <u>Laboratory Analysis</u> | | | | | | <u>Quality Assurance</u> | |
|-----------------------------------|-----------------------|---------------|--------------|-----------------|-------------------|--------------------------|-------------------|
| <u>Analysis</u> | <u>Parameter</u> | <u>Result</u> | <u>Notes</u> | <u>Quantity</u> | <u>Method</u> | <u>Precision</u> | <u>Accuracy</u> |
| <u>Date</u> <u>Time</u> <u>By</u> | | | | | | <u>± RPD</u> | <u>± Recovery</u> |
| 01/15 0900 KIK | BOD, 5-day | 1809.3 mg/L | | | SM 18th 5210B | 18.02 | 100.6 * |
| 01/16 1631 RAH | Beryllium | 0.0100 mg/L | | | EPA 200.8 | | |
| 01/14 0800 MNM | Cyanide Total (as CN) | < 0.0100 mg/L | | | SM 18th 4500-CN E | 0.94 | 103.1 * |
| 01/13 1320 LM | Dissolved Oxygen | 0.4 mg/L | | | SM 18th 4500-O G | | |
| 01/21 1340 VLP | Phenolics | 0.264 mg/L | | | EPA 420.1 | 6.32 | 95.0 |
| 01/16 1631 RAH | Chromium | < 0.0010 mg/L | | | EPA 200.8 | | |
| 01/16 1631 RAH | Silver | < 0.0010 mg/L | | | EPA 200.8 | | |
| 01/16 1631 RAH | Antimony | < 0.0200 mg/L | | | EPA 200.8 | | |
| 01/15 0900 KIK | BOD, Carbonaceous | 1282.3 mg/L | | | SM 18th 5210B | 16.95 | 100.6 * |

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature _____

Environmental Services Co., Inc.



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01/23/2014

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CITY OF SILOAM SPRINGS

P.O. Box 80
Siloam Springs, AR 72761

NPDES Enforcement Section
Water Division
AR Dept of Environmental Quality
5301 Northshore Drive
North Little Rock AR 72118-5317