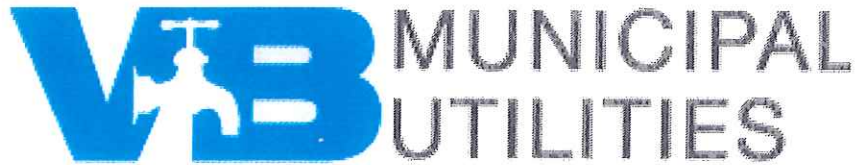


Commission:
Jim Williamson
Todd Young
J.W. Floyd
Chad Adams
Keith Hefner



Attorney
Sean Brister
Secretary
Kathy Geppert

“Providing Water, Sewer, and Sanitation Services”
2806 Bryan Road / P.O. Drawer 1269
Van Buren, Arkansas 72957
479-474-5067 / Fax 479-471-8969
Van Buren Municipal Utilities

October 25, 2019

Certified Mail # 7011 2970 0002 2764 7636

Pretreatment Coordinator NPDES Branch
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, Arkansas 72218

Re: Permit #AR0021482, #AR0040967, & #AR0037567
Annual Pretreatment Report for 2018-2019

Dear Mr. Yates:

Please find our Annual Pretreatment Program Report. The report contains the following:

- I. Cover Page
- II. Annual Averages for Main, North and Bekaert Plants
- III. Influent-Effluent Chart for Main Plant – Table III
- IV. Influent-Effluent Chart for North Plant
- V. Attachment A -- PPS Report Updated SIU List
- VI. Attachment B -- Significant Violations – Enforcement Action
- VII. Attachment C – PPS (1st page)
- VIII. Attachment C – PPS (2nd page)
- IX. Attachment of Legal Notice for SNC Violator

If you have any questions feel free to contact our office.

Sincerely,

A handwritten signature in blue ink that reads 'Steve Dufresne'. The signature is stylized with a long horizontal stroke and a vertical line extending downwards from the end.

Steve Dufresne
Director

Cc: ADEQ
Kim Redo, VBMU Environmental Coordinator
North & South Plant files

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: Oct. 1, 2018 TO Sept. 30, 2019
TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0021482
AVERAGE POTW FLOW: 3.013 MGD % IU FLOW: 31.6 %

METALS, CYANIDE and PHENOLS (Total)	MAHC (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/quarter			WQ level/limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/quarter			LABORATORY ANALYSIS			
		11/8/2018	2/26/2019	4/15/2019		7/30/2019	11/8/2018	2/26/2019	4/15/2019	7/30/2019	EPA MQL (µg/l) (1)	EPA Method Used (1)
Antimony	N/A	0	0	0	0	0	0	0	0	60	200.8	60
Cadmium	54.1	0	0.59	0	126.52	0	0	0	0	0.5	200.8	0.5
Copper	1000.0	14	7.9	7	431.63	5.2	3.7	4.6	8.6	0.5	200.8	0.5
Lead	587.2	1.2	0.93	0.7	587.66	0	0.6	0	0	0.5	200.8	0.5
Mercury	0.98ug/L	0	0.030	0.00086	0.39 ug/L	0	0.0052	0	0	.005	EPA 245.7	1.8 ng/L
Nickel	426.42	3.6	2.5	2.8	15071.86	2.4	2.3	1.3	2.9	0.5	200.8	0.5
Selenium	85.28	0	0	0	137.76	0	0	0	0	5	200.8	5
Silver	250.00	0	0	0	112.58	0	0	0	0	0.5	200.8	0.5
Zinc	300.00	120	0	56	3461.17	39	53	23	33	20	200.8	20
Chromium, total	1000.0	0	0	0	22680.2	0	0	0	0	10	200.8	10
Cyanide	100.00	0	0	0	154.01	0	0	0	0	10	SM4500-CN C.E	0.01 mg/L
Arsenic	71.07	1.2	1.4	1.3	4807.76	1.00	1.00	1.10	1.70	0.5	200.8	0.5
Molybdenum	63.96	0	0	0	N/A	0	0	0	0	--	200.8	0.5
Phenols	N/A	0.027	0	0.036	N/A	0.0099	0.039	0.017	0	5	EPA 420.1	0.005 mg/L
Beryllium	100.00	0	0	0	173.41	0	0	0	0	0.5	200.8	0.5
Thallium Chloroform	N/A	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	3.452	3.296	3.540	N/A	2.830	3.171	3.862	1.776	2.0	EPA 624.1	2.0

*No MAHC's calculated for these parameters

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.

(2) This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either

ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

- (3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.
MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration (from inf-eff charts MAHC column by Larry Weir, Egr.)
WQ - "Water Quality Levels not to exceed" OR actual permit limit.

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: Oct. 1, 2018 TO Sept. 30, 2019
TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0040967
AVERAGE POTW FLOW: 1.608 MGD IU FLOW: 0.820 %

METALS, CYANIDE and PHENOLS (Total)	MAHC (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/year				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/year				LABORATORY ANALYSIS			
		11/12/2018	3/12/2019	6/19/19	9/6/2019		11/12/2018	3/12/2019	6/19/2019	9/6/2019	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)	
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	0	60	200.8	60
Cadmium	5.58	0	0	0	0	1.84	0	0	0	0.50	0	0.5	200.8	0.5
Copper	31.85	32	6.9	13	9.8	9.24	5.3	3.7	5.00	4.2	0	0.5	200.8	0.5
Lead	10.84	1	0	1	0.52	2.71	0	0	0.50	0	0	0.5	200.8	0.5
Mercury,LL (in ng/L)	0.03	0.0073	0.007	0.005	0.005	0.0134	0	0.005	0.0050	0	0	.005	EPA 245.7	0.0018
Nickel	167.18	4.6	3	3.7	3.6	96.96	3.3	2.7	6.50	2.1	0	0.5	200.8	0.5
Selenium	11.16	0	0	0	0	5.58	0	0	2.00	0	0	5	200.8	5
Silver	3.73	0	0	0	0	0.93	0	0	0.50	0	0	0.5	200.8	0.5
Zinc	167.71	180	54	480	63	85.53	57	32	48	23	0	20	200.8	20
Chromium, total	748.99	10	0	0	0	295.4(tr)	0	0	10	0	0	10	200.8	10
Chromium, Hexavalent		n/a	n/a	n/a	n/a	11.81(hex)	n/a	n/a	n/a	n/a	n/a	10	SM 3500- Cr B	10
Cyanide	187.2	0.078	0	0.010	0.01	5.80	0	0	0.01	0.01	0	10	SM4500- CN C,E	0.00001
Arsenic	341.2	1.9	1.3	1.6	12	348.96	0.66	0.6	0.79	4.9	0	0.5	200.8	0.5
Phenols (mg/L)	*	0.072	0.065	0.074	0.088		0.015	28	0.013	0.005	0	5	EPA 420.1	0.000005
Beryllium	11.83	0	0	0	0	5.91	0	0	0.50	0	0	0.5	200.8	0.5
Thallium	*	0	0	0	0	N/A	0	0	0.50	0	0	0.5	200.8	0.5
Flow, MGD	N/A	0.923	2.022	0.883	01.386	N/A	0.923	2.022	0.883	1.386				

*No MAHC's calculated for these parameters

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.

(2) This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

MAHL - Maximum Allowable Headworks Level / MAHC - Maximum Allowable Headworks Concentration

WQ - "Water Quality Levels not to exceed" OR actual permit limit.

PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT USERS LIST
 ATTACHMENT A

Control Document COMPLIANCE STATUS REPORTS

INDUSTRIAL USER	SIC CODE	Categorical Determination	Y/N	Last Action	New User	Times Inspected	Times Sampled	BMR	90-DAY COMPLIANCE	SEMI ANNUAL	SELF MONITORING	EFFLUENT LIMITS
Arkansas Lamp Mfg.	1721	Categorical	Y	10/8/2017	no	1	0*	yes	n/a	C	n/a	C*
B & W Plating	1721	Categorical	Y	11/17/2016	no	1	0*	yes	n/a	C	n/a	C*
FabTech	3400	Categorical	Y	2/28/2019	no	1	2	yes	n/a	C	C	C
River City Coatings	1721	Categorical	Y	9/18/2019	no	1	2	yes	n/a	C	C	C
Simmons Foods	2015	Noncategorical	Y	4/15/2017	no	1	12	yes	n/a	n/a	C	NC
Simmons Poultry Farms	2017	Noncategorical	Y	11/30/2017	no	1	11	yes	n/a	n/a	C	NC
Tate & Lyle	2046	Noncategorical	Y	5/31/2019	no	1	7	yes	n/a	n/a	C	NC
Tyson Foods Arkansas Valley	2017	Noncategorical	Y	11/30/2018	no	1	5	yes	n/a	n/a	C	NC
Truck Wash of America	7542	Noncategorical	Y	1/1/2019	no	1	6	yes	n/a	n/a	C	NC

*B & W Plating - Zero Discharge for entire year - Sampling not possible
 *Arkansas Lamp - no discharge for entire year.

SIGNIFICANT VIOLATORS -- ENFORCEMENT ACTIONS TAKEN
ATTACHMENT B

INDUSTRIAL USER	NUMBER OF ACTIONS TAKEN										COMPLIANCE SCHEDULE			
	Nature of Violation		N.O.V.	A.O.	CIVIL	CRIMINAL	OTHER	PENALTIES COLLECTED	DATE ISSUED	DATE DUE	CURRENT STATUS	COMMENTS		
	REPORTS	LIMITS												
River City Coatings	2X		2	0	0	0	no	n/a	n/a	C	Late reports			
Simmons Foods		15X	9	0	0	0	yes	n/a	n/a	NC	13 BOD & 1 pH excursions			
Simmons Prepared Foods		19X	11	0	0	0	yes	n/a	n/a	NC	32 BOD & 1 pH excursions			
Tate & Lyle	1X		1	0	0	0	yes	n/a	n/a	C	Incorrect reporting of data			
Arkansas Valley Truck Wash		3X	2	0	0	0	yes	n/a	n/a	C	3 BOD & 1 TSS excursions			

PRETREATMENT PERFORMANCE SUMMARY (PPS)
ATTACHMENT C

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT DEPARTMENT AUTHORIZATION.

General Information

Control Authority Name Van Buren Municipal Utilities

Address 2806 Bryan Road, P.O. Drawer 1269

City Van Buren State/Zip Arkansas 72956

Contact Person Steve Dufresne Director
(Position)

Contact Telephone (479) 474-5067
(Area Code)

NPDES Permit Nos. AR0021482 & AR0040967

Reporting Period October 1, 2018 September 30, 2019
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 4

Total Number of Significant Noncategorical IUs 5

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>
1) No. of SIUs submitting BMRs/Total No. Required.....	0/0	N/A*
2) No. of SIUs submitting 90-day Compliance Reports/No. Required.....	0/0	N/A*
3) No. of SIUs submitting Semi-annual Reports/ Total No. Required.....	0/0	0/0
4) No. of SIUs meeting Compliance Schedule/ Total No. Required to Meet Schedule.....	0/0	0/0
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs.....	0/4	1/5
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical).....		1/9

Compliance Monitoring Program

1) No. of Control Documents Issued/Total No. Required.....	4/4	5/5
2) No. of Nonsampling Inspections Conducted.....	4/4	5/5
3) No. of Sampling Visits Conducted.....	4/4	45/5

4)	No. of Facilities Inspected (nonsampling).....	<u>4/4</u>	<u>5/5</u>
5)	No. of Facilities Sampled.....	<u>2/4*</u>	<u>5/5</u>

Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>
1)	No. of Compliance Schedules Issued/No. of Schedules Required.....	<u>0/0</u> <u>0/0</u>
2)	No. of Notices of Violations Issued to SIUs.....	<u>2/4</u> <u>23/4</u>
3)	No. of Administrative Orders Issued to SIUs.....	<u>0</u> <u>0</u>
4)	No. of Civil Suits Filed.....	<u>0</u> <u>0</u>
5)	No. of Criminal Suits Filed.....	<u>0</u> <u>0</u>
6)	No. of Significant Violators (newspaper publication attached).....	<u>0</u> <u>1</u>
7)	Amount of Penalties Collected (total dollars/ IUs Assessed) (Not Surcharges).....	<u>\$0</u> <u>\$40,672.20/4</u>
8)	Other Actions (sewer bans, etc.).....	<u>0</u> <u>0</u>

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.

Authorized Representative Steve Jese Date 10-21-2019

*B & W Plating is Zero Discharge; Arkansas Lamp Mfg. had no discharges in 2018-2019 pretreatment year.

THURSDAY, OCTOBER 17, 2019

LEGLAS	LEGLAS	LEGLAS
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**CITY OF VAN BUREN WASTEWATER PRETREATMENT PROGRAM
NOTICE OF SIGNIFICANT VIOLATION**

As directed by the Environmental Protection Agency in the City of Van Buren's National Pollutant Discharge Elimination System (NPDES) permit #AR0021482, public notice of significant violators of the City of Van Buren Wastewater Pretreatment Program is hereby given. A significantly violating industrial user is one which meets one or more of the following criteria:

- (A) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent or more of all measurements taken during a six month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter;
- (B) Technical Review Criteria (TRC) Violations, defined here as those which thirty-three percent or more of all of the measurements for each pollutant parameter taken during a six month period equal or exceed the product of the daily maximum limit of the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil and grease, and 1.2 for all other pollutants except pH);
- (C) Any other violation of a pretreatment effluent limit (daily maximum or longer term average) that the Control Authority determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public);
- (D) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f) (1) (vi) (B) section to halt or prevent such a discharge;
- (E) Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;
- (F) Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- (G) Failure to accurately report non-compliance;
- (H) Any other violation or group of violations which the Control Authority determines will adversely affect the operation or implementation of the local pretreatment program.

Significant violators for the period October 1, 2018 through March 31, 2019 are as follows:

Industry
Simmons Prepared Foods (Main Street)
 Reasons for Significant NonCompliance classification:
(A) Biochemical Oxygen Demand

THURSDAY, OCTOBER 17, 2019

LEGLAS	LEGLAS	LEGLAS
--------	--------	--------

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- (D) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f) (1) (vi) (B) of this section to halt or prevent such a discharge;
- (E) Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;
- (F) Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
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they will fit in the letter
squares. The number after the
definition tells you how many
syllables in each word.
cator (1)
cross Blanchett" (1)

PROOF OF PUBLICATION
STATE OF ARKANSAS
COUNTY OF SEBASTIAN

I, **Julie Newman** do solemnly swear that I am **an advertising representative** of the **Times Record**, a daily newspaper having a second class mailing privilege, and being not less than four pages of five columns each, published at a fixed place of business and at fixed daily intervals continuously in the City of Fort Smith, Sebastian County, Arkansas, for more than a period of twelve months, circulated and distributed from an established place of business to subscribers and readers generally of all classes, in the city and county aforesaid, for a definite price for each copy, or a fixed price per annum, which was fixed at what is considered the value of the publication based upon the news service value it contains, that at least fifty percent of the subscribers thereto have paid cash for their subscription to the newspaper or its agents or through recognized news dealers, over a period of at least six months and that said newspaper published an average of more than forty percent news matter. The newspaper is circulated in the counties of Crawford, Franklin, Johnson, Logan, Polk, Scott and Sebastian in Arkansas, and Haskell, Leflore and Sequoyah Counties in Oklahoma. I further certify that the legal notice hereto attached in the matter of:

**RE: CITY OF VAN BUREN WASTEWATER PRETREATMENT PROGRAM
NOTICE OF SIGNIFICANT VIOLATION**

As directed by the Environmental Protection Agency in the City of Van Buren's National Pollutant Discharge Elimination System (NPDES) permit #AR0021482, public notice of significant violators of the City of Van Buren Wastewater Pretreatment Program is hereby given. A significantly violating industrial user is one which meets one or more of the following criteria:

ORDER# 1285140
COST: \$314.50

Was published in the regular daily issue of said newspaper for consecutive insertions as follows:

First Run: 10/17/19
Second Run:
Third Run:

Julie Newman

(Signature)

Sworn before me on the 22nd day of October 20 19

My Commission expires 3/13/2027

Joel Buben

Notary Public

FOSTER BRABEC
NOTARY PUBLIC
CRAWFORD COUNTY, ARKANSAS
COMM. EXP. 03/13/2027
COMMISSION NO. 12700969