

To: Mo Shafii
From: A. Gilliam
Subject: Alma Permit Modification
Filename: pretreatmentfactsheet.wpc;2
Date: November 6, 1991

FACT SHEET

for modification of the National Pollutant Discharge Elimination System (NPDES) Permit Number AR0021466 to discharge to waters of the United States.

The issuing office is:

Arkansas Department of Pollution Control and Ecology
NPDES Branch
8001 National Drive
Post Office Box 8913
Little Rock, Arkansas 72219-8913

The applicant is:

City of Alma
P.O. Box 308
Alma, Arkansas 72921

1. The City of Alma was required to develop a Pretreatment Program which would meet the minimum requirements of 40 CFR 403. Their Program was approved by EPA, Region VI and subsequently incorporated by reference into their NPDES Permit on May 5, 1985. Specific Pretreatment Program implementation requirements are stated in the Permit, Part III, Other Conditions. The provisions require the City to continue to update and modify their Program to remain current with revisions to 40 CFR 403.

Correspondence from the City dated 8/20/91, was received by the Department requesting that the specific Pretreatment Program Implementation requirements be deleted from their NPDES Permit. The City's argument is: they have had no, and anticipate no changes in their industrial user base; they feel their present administrative procedures and authorities are adequate for the protection of their collection system; and expenditures to modify their present Program are not justifiable.

A review of documents located in their Pretreatment files indicate that wastewater discharges from their two (2) Significant Industrial Users have not and most likely will not pose a great potential for upsetting, inhibiting or causing pass-through of the City's treatment plant.

This is the basis for deleting the specific Pretreatment Program Implementation requirements from Part III of their NPDES permit. It is felt that the Standard Pretreatment language will be adequate for their present situation.

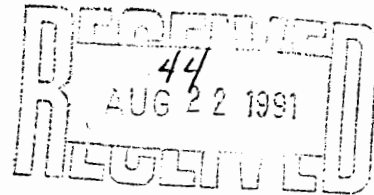
City of Alma

P. O. BOX 308 — ALMA, ARKANSAS 72921

WATER & SEWER DEPARTMENT — Phone (501) 632-2254 SUPERINTENDENT — Phone (501) 632-4169

August 20, 1991

Mr. Chuck Bennett
Chief - Water Division
Arkansas Department of Pollution
Control and Ecology
8001 National Drive
P.O. Box 8913
Little Rock, Arkansas 72219



Re: NPDES permit No. AR0021466
City of Alma

Dear Mr. Bennett:

In 1985, the City of Alma Water and Sewer Department finalized and put into effect an Industrial Pretreatment Program. When the program became effective, Alma had one continuous industrial contributor and one intermittent industrial contributor to its treatment facility. The City has the same conditions currently.

The one continuous industry is Allen Canning Company which is Alma's largest wastewater contributor. This industry processes various beans, greens, and hominy. There are no categorical discharges from this facility. The other industry, Bryant Preserving Company, processes honeydew melons, watermelons, and cantaloupes for preserves. This facility operates seasonally and does not discharge any categorical constituents.

The City of Alma requests that its pretreatment program be eliminated from the State's pretreatment oversight. The City will continue to operate the program locally and enforce its provisions per the City ordinance establishing Alma's authority. The City will operate the program under its established authority to protect the treatment facility and the health of Alma's citizens.

The City feels the time and expense of updating and modifying the pretreatment program stipulated by EPA could better be utilized to make anticipated improvements to the sewer system and treatment plant. In light of the industries covered by Alma's Pretreatment Program, the City feels that any undue financial hardships caused by compliance with increasing regulatory changes are not necessary in this particular situation.

AS
10/16/91
Request to take
for and before final.
will need to take state
No State indicated possible
reopen in 1991
Sludge requirements
Nov 1, 1991
know what
1991

NPDES PERMIT NO. AR0021466

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
WATER DIVISION

Mr. Chuck Bennett
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The City appreciates your review and consideration of this request and anticipates your response. If further information is needed by your office, please call or notify the City.

Very truly yours,

A handwritten signature in cursive script, appearing to read "D. Millard". The signature is written in black ink and is positioned above the typed name.

Darryl Millard
Superintendent Water and Sewer Department

DM/bh

cc: Mickle Wagner Coleman, Inc.