

From: Torrence, Rufus
Sent: Tuesday, November 13, 2012 1:31 PM
To: Gary Smith (vbeasy@aol.com)
Cc: Kim Redo (kimredo@aol.com)
Subject: AFIN 17-00062 AR0021482 & AFIN 17-00565 AR0040967 City of Van Buren 2011 Annual Report
Attachments: Ltr TBLL MAHL Development 20120817.pdf; VNBN SOUTH Conventionals TBLL WorkSheet 20121108.pdf; VNBN NORTH Conventionals TBLL Worksheet 20121108.pdf; North WWTP Inf Eff Chart.doc; South WWTP Inf Eff Chart.doc; VNBN 2011 Annual Report Cover Letter-ICIS.pdf



November 13, 2012

Gary Smith, Director
City of Van Buren
P O Drawer 1269
Van Buren, AR 72956

Re: City of Van Buren 2011 Annual Report
(Permit No. AR0021482, AFIN 17-00062 & AR0040967, AFIN 17-00565)

Dear Mr. Smith:

The Department has reviewed the City's 2011 Annual Report. The report is complete. However, the Department has concerns:

1. The City has demonstrated that local limits for CBOD₅ and TSS are not necessary at this time. Nonetheless, the department will review the CBOD₅ and TSS Maximum Allowable Headworks Loads (MAHLs) annually to ensure no significant increase in loadings (Refer to the attached department letter dated August 17, 2012). Therefore, the Department is asking the City to report quarterly CBOD₅, TSS and NH₃-N loadings in future annual reports. **Please report the maximum daily loading in each quarter and not the average loading.** Please find attached updated Influent-Effluent charts. The chart shows MAHLs for CBOD₅, TSS and NH₃-N. The City should review the attached Excel spreadsheets (PDF copies) which show the derivation of the loadings for each plant. Copies of the complete Excel Workbooks with supporting documentation were made available to the City during the last pretreatment audit in June 2012. Please note that the MAHLs are "*pretreatment standards for the purposes of ...section 307(c) of the Act*" pursuant to 40 CFR 403.5(d).

2. The City reported that Simmons Food discharged a slug load to the POTW. In accordance with 40 CFR 403.8(2)(vi), the City must “*Evaluate whether each such Significant Industrial User needs a plan or [Best Management Practices] to control Slug Discharges*”. In accordance with paragraph (j) in Section 2. 7 (*Contents of Permit*) of Ordinance # 26-2009, the City has the authority to include in Simmons’ permit the “*Requirement to Control Slug Discharges...*”. Please note that if an SIU discharge (normal or slug) causes the City to exceed the MAHL for a parameter (CBOD₅, TSS, etc.), the City can be cited for a violation of 40 CFR 403.5(d) for failing to prevent Interference [40 CFR 403.3(k) & 403.5(b)(4)] even if no Pass Through [40 CFR 403.3(p)] occurs.

3. **The City must send the Department the recorded maximum daily CBOD₅ and TSS loading (lbs/day) at the South POTW headworks which occurred during the slug loading from Simmons.**

The Department appreciates the City’s cooperation with the concerns listed above.

If you have any questions or need more information, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us .

Sincerely,



Rufus Torrence, Pretreatment Engineer
Water Division

A PRLN RT

VAN BUREN MUNICIPAL UTILITIES
PROVIDING WATER, SEWER AND SOLID WASTE SERVICES
2806 BRYAN ROAD
PO DRAWER 1269

STEVE DUFRESNE, MANAGER
(479) 474-5067
FAX (479) 471-8969

October 29, 2012

Mr. Rufus Torrence
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 2011
Certified Mail # 7011 2970 0002 2763 8733

Dear Mr. Torrence:

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

- I. Cover Page
- II. Influent-Effluent Chart for Main Plant – Table III
- III. Influent-Effluent Chart for North Plant
- III. Attachment A -- PPS Report Updated SIU List
- IV. Attachment B -- Significant Violations – Enforcement Action
- V. Attachment C – PPS (1st page)
- VI. Attachment C – PPS (2nd page)

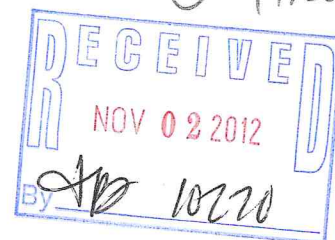
If you have any questions feel free to contact our office.

Sincerely,

Steve Dufresne
Steve Dufresne
Director

- ① Inf/eff logged
- ② IUs updated
- ③ Annual Report Form
- ④ ICIS Coded
- ⑤ August 17, Letter Attached
- ⑥ TRLL workshop

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



WL

PPS Program Report

* NPDES ID: AR002148ZPermittee's Name V. J. Wren* Report Received/Event Date: 10/31/2012Date 11-8-2012

Report Type

Select a Program Report to add

<input type="radio"/> Biosolids Program Report	<u>AR0037567</u>	<input checked="" type="checkbox"/> Pretreatment Performance Summary Report
<input type="radio"/> CAFO Annual Report	<u>AR0040967</u>	<input type="checkbox"/> SSO Annual Report
<input type="radio"/> CSO Event Report		<input type="checkbox"/> SSO Event Report
<input type="radio"/> Local Limits Report		<input type="checkbox"/> SSO Monthly Event Report
<input type="radio"/> MS4 Program Report		<input type="checkbox"/> Storm Water Event Report

Report Information

* Pretreatment Performance Summary Start Date: 10/01/2011

Significant Industrial Users (SIUs)

SIUs:	<input type="text" value="9"/>
SIUs Without Control Mechanism:	<input type="text" value="0"/>
SIUs Not Inspected:	<input type="text" value="0"/>
SIUs Not Sampled:	<input type="text" value="0"/>
SIUs in SNC with Pretreatment Standards:	<input type="text" value="0"/>
SIUs in SNC with Reporting Requirements:	<input type="text" value="1"/>
SIUs in SNC with Pretreatment Schedule:	<input type="text" value="0"/>
SIUs in SNC Published in Newspaper:	<input type="text" value="1"/>
SIUs Schedules:	<input type="text" value="2"/>
Violation Notices Issued to SIUs:	<input type="text" value="5"/>
Administrative Orders Issued to SIUs:	<input type="text" value="0"/>
Civil Suits Filed Against SIUs:	<input type="text" value="0"/>
Criminal Suits Filed Against SIUs:	<input type="text" value="0"/>

Categorical Industrial Users (CIUs)

CIUs:	<input type="text" value="4"/>
CIUs in SNC:	<input type="text" value="0"/>

Penalties

Dollar Amount of Penalties Collected: \$ 6586

Industrial Users (IUs) from which Penalties have been collected: 3

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Notification of IU Schedule for Remedial Measures:

Initial Response to Violation of IU Schedule for Remedial Measures:

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

Removal Credits

Removal Credits Application Status:

Date of Most Recent Removal Credits Approval:

Removal Credits:

Acceptance of Waste

Acceptance of Hazardous Waste:

Acceptance of Non-Hazardous Industrial Waste:

Acceptance of Hauled Domestic Wastes:

Deficiencies

Deficiencies Identified During IU File Review:

Control Mechanism Deficiencies:

Legal Authority Deficiencies:

Deficiencies in Data Management and Public Participation:

Deficiencies in Interpretation and Application of Pretreatment Standards:

Inadequacy of Sampling and Inspections:

Adequacy of Pretreatment Resources:

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling:

ADEQ

ARKANSAS
Department of Environmental Quality

August 17, 2012

Gary Smith, Director
City of Van Buren
P O Drawer 1269
Van Buren, AR 72956

Re: City of Van Buren Pretreatment Program Audit Response & TBLL/MAHL Development
(Permit No. AR0021482, AFIN 17-00062)

Dear Mr. Smith:

In reference to Van Buren Municipal Utilities (VBMU) letters dated July 12, 2012 (WER development) and August 6, 2012 (Pretreatment Audit Response), VBMU has concluded that local limits are not necessary at this time.

Since VBMU has decided not to develop local limits at this time and has demonstrated that local limits are not necessary, no further efforts on local limits development are required at this time. Please be advised, Part II.12.b on page 9 of the NPDES permit requires VBMU to re-evaluate the need for local limits based on any changes to the City's SIUs. This will be reviewed by the Department on an annual basis along with the submitted annual report.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us.

Sincerely,



Rufus Torrence,
ADEQ Engineer

(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. CBOD₅, TSS and NH₃-N limits are in mg/l.

(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
For BOD₅, TSS & NH₃-N, in each quarter show the maximum daily loading and the maximum daily effluent concentration.

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

ATTACHMENT C

PRETREATMENT PERFORMANCE SUMMARY (PPS)

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

I. General Information

Control Authority Name _____

Address _____

City _____ State/Zip _____

Contact Person _____ Position _____

Contact Telephone _____ NPDES Permit Nos. _____

Reporting Period _____

(Beginning Month and Year)

(Ending Month and Year)

Total Number of Categorical IUs _____

Total Number of Significant Noncategorical IUs _____

Total Number of Non-Significant (yet permitted) IUs _____

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

1) No. of SIUs Submitting BMRs/Total No. Required.	/	N/A*
2) No. of SIUs Submitting 90-Day Compliance Reports/No. Required.	/	N/A*
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required.	/	/
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule	/	/
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs	/	/
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .	/	/

III. Compliance Monitoring Program

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued/Total No. Required.	<u> / </u>	<u> / </u>
2) No. of Nonsampling Inspections Conducted. .	<u> / </u>	<u> / </u>
3) No. of Sampling Visits Conducted.	<u> / </u>	<u> / </u>
4) No. of Facilities Inspected (nonsampling) .	<u> / </u>	<u> / </u>
5) No. of Facilities Sampled	<u> / </u>	<u> / </u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Compliance Schedules Issued/No. of Schedules Required	<u> / </u>	<u> / </u>
2) No. of Notices of Violations Issued to SIUs	<u> </u>	<u> </u>
3) No. of Administrative Orders Issued to SIUs	<u> </u>	<u> </u>
4) No. of Civil Suits Filed.	<u> </u>	<u> </u>
5) No. of Criminal Suits Filed	<u> </u>	<u> </u>
6) No. of Significant Violators (attach newspaper publication).	<u> </u>	<u> </u>
7) Amount of Penalties (not surcharges) Collected (total dollars/IUs assessed) . . .	<u> / </u>	<u> / </u>
8) Other Actions (sewer bans, etc.).	<u> </u>	<u> </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 Date _____

(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. CBOD₅, TSS and NH₃-N limits are in mg/l.

(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
For BOD₅, TSS & NH₃-N, in each quarter show the maximum daily loading and the maximum daily effluent concentration.

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

ATTACHMENT C

PRETREATMENT PERFORMANCE SUMMARY (PPS)

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

I. General Information

Control Authority Name _____

Address _____

City _____ State/Zip _____

Contact Person _____ Position _____

Contact Telephone _____ NPDES Permit Nos. _____

Reporting Period _____

(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs _____

Total Number of Significant Noncategorical IUs _____

Total Number of Non-Significant (yet permitted) IUs _____

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

1) No. of SIUs Submitting BMRs/Total No. Required.	_____ / _____	_____ N/A*
2) No. of SIUs Submitting 90-Day Compliance Reports/No. Required.	_____ / _____	_____ N/A*
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required.	_____ / _____	_____ / _____
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule	_____ / _____	_____ / _____
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs	_____ / _____	_____ / _____
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .	_____ / _____	_____ / _____

Pollutant	% Rem ⁷	Water Quality ¹ mg/l	Water Quality ¹ lbs/day	Sludge ³ mg/kg	Sludge ³ lbs/day	Inhibition ² mg/l	Inhibition ⁴ lbs/day	MAHL lbs/day	MAHC mg/l	Domestic lbs/day	Allocation for %SF ⁵ lbs/day	MAIL ⁶ lbs/day	Max Inf Exceedec MAHC	Max Effluent vs WQS(mg/l)
Cadmium Total	67	0.0018	0.0550	85	0.2558	1.00	9.85	0.0550	0.00558	0.0049	0.0495	0.0446	No	No
Copper Total	71	0.0092	0.3137	4300	12.2122	1.00	9.85	0.3137	0.03185	0.2564	0.2823	0.0259	0.0370	No
Lead Total	75	0.0027	0.1068	840	2.2584	1.00	9.85	0.1068	0.01084	0.0156	0.0961	0.0805	No	No
Mercury Total	60	0.00001	0.0003	57	0.1916	0.10	0.98	0.0003	0.00003	0.0029	0.0003	0.0000	No	No
Nickel Total	42	0.0970	1.6466	420	2.0164	1.00	9.85	1.6466	0.16718	0.0613	1.4820	1.4206	No	No
Selenium Total	50	0.0056	0.1099	100	0.4033	0.20	1.97	0.1099	0.01116	0.0489	0.0989	0.0501	No	No
Silver Total	75	0.0009	0.0368	0	0.0000	0.25	2.46	0.0368	0.00373	0.0049	0.0331	0.0282	No	No
Zinc Total	49	0.0855	1.6518	7500	30.8639	4.500	44.32	1.6518	0.16771	1.3798	1.4866	0.1068	0.1900	No
Chromium Total	82	0.2954	16.1660	3000	7.3772	1.00	9.85	7.3772	0.74899	0.0977	6.6395	6.5417	No	No
Cyanide Total	69	0.0058	0.1844	0	0.0000	0.23	2.27	0.1844	0.01872	0.0977	0.1659	0.0682	No	No
Arsenic	45	0.3490	6.2493	75	0.3361	0.10	0.985	0.3361	0.03412	0.0049	0.3025	0.2976	No	No
Molybdenum	50	0.0000	0.0000	75	0.3025	0.20	1.97	0.3025	0.03071	9774470.23	0.2722	0.0000	No	No
Beryllium	50	0.005915	0.1165	0	0.0000	0.10	0.98	0.1165	0.01183	9774470.23	0.1049	0.0000	No	No
CBOD							See Note 9=>	3336.00						
TSS							See Note 10=>	3336.00						
NH3-N							See Note 11=>	417.00						

Dry tons/day of sludge⁸ 1.0082 Safety Factor 0.10

1 lbs/day = mg/l * 8.34 * average flow / (1-%Rem)

2 Page 3-44 of EPA 833B87202 Be est @ 0.10 mg/l; Zinc (4.5 mg/l) and CN (0.23 mg/l) from Sept 06 Annual Report

3 lbs/day = (dry tons/day * 0.002 * critria(mg/kg)) / % Rem

4 lbs/day = mg/l * Flow * 8.34

5 lbs/day = (1 - SF) * MAHL

6 MAIL = Maximum allowable industrial loading = Allocation for % SF - Domestic

7 Rem Eff from Page 3-56 EPA 833B87202, Be & Mo est @ 50; Cu,Pb & Zn from "Rem" spreadsheet in this Workbook

8 Dry tons/day of sludge based on page 5 of checklist in Audit Report dated July 11, 2006.

9 The CBOD Peak Load (2798 lbs/day) occurred in June 2011; see TSS Peak Load worksheet. The Department elected to use a typical design load of 2 MGD X 200 mg/l X 8.34 = 3336 lbs/day.

10 The TSS Peak Load (2249 lbs/day) occurred in May 2011; the Department elected to use a typical design load of 3336 lbs/day.

11 The NH3-N Peak Load (155.89 lbs/day) occurred in August 2011; the Department elected to use a typical design load of 2 MGD X 25 mg/l X 8.34 = 417 lbs/day.

VNBN South MAHL

Pollutant	% Rem ⁷	Water Quality ¹ mg/l	Water Quality ¹ lbs/day	Sludge ³ mg/kg	Sludge ³ lbs/day	Inhibition ² mg/l	Inhibition ⁴ lbs/day	MAHL lbs/day	MAHC mg/l	Domestic lbs/day	Allocation for %SF lbs/day ⁵	MAIL lbs/day	Max Inf Exceedec MAHC	Max Effluent vs WQS(mg/l)
Cadmium Total	67	0.1265	8.2818	85	1.17	1.00	21.60	1.17	0.05415	0.01	1.05	1.043	No	No
Copper Total	68	0.4316	29.1356	4300	58.30	1.00	21.60	21.60	1.00000	0.35	19.44	19.088	No	No
Lead Total	61	0.5877	32.5483	840	12.70	1.00	21.60	12.70	0.58778	0.08	11.43	11.349	No	No
Mercury Total	60	0.00039	0.0212	57	0.88	0.10	2.16	0.0212	0.00098	0.0032	0.02	0.016	No	No
Nickel Total	42	15.0719	561.3125	420	9.22	1.00	21.60	9.22	0.42684	0.10	8.30	8.202	No	No
Selenium Total	50	0.1378	5.9513	100	1.84	0.20	4.32	1.844	0.08537	0.03	1.66	1.628	No	No
Silver Total	75	0.1126	9.7273	0	0.00	0.25	5.40	5.40	0.25000	0.04	4.86	4.824	No	No
Zinc Total	69	3.4612	241.1720	7500	100.22	0.300	6.48	6.48	0.30000	2.80	5.83	3.027	No	No
Chromium Total	82	22.6802	2721.6997	3000	33.73	1.00	21.60	21.60	1.00000	0.16	19.44	19.280	No	No
Cyanide Total	69	0.1540	10.7315	0	0.00	0.10	2.16	2.16	0.10000	0.16	1.94	1.784	No	No
Arsenic	45	4.8078	188.8193	75	1.54	0.10	2.160	1.54	0.07114	0.02	1.38	1.361	No	No
Molybdenum	50	0.0000	0.0000	75	1.38	0.20	4.32	1.383	0.06403	0.01	1.24	1.237	No	No
Beryllium	50	0.173405	7.4913	0	0.00	0.10	2.16	2.16	0.10000	0.00	1.94	1.939	No	No

Phenols ? ?

503 Table I														
Molybdenum	50	0.0000	0.00	75		0.20							0.022	0.046

PCBs ? ?

NPDES Permit														
CBOD5							Note 8 ==>	6672.0	Note 9 ==	3910.0	6004.8	2094.8		
TSS							Note 10 ==>	6672.0	Note 9 ==	4600.0	6004.8	1404.8		
NH3-N							Note 11 ==>	835.0	Note 11 ==	398.7	751.5	352.8		
TP							?		?					
TK							?		?					

Dry tons/day of sludge ³	4.61	Safety Factor	0.10
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- Notes:
- lbs/day = mg/l * 8.34 * average flow / (1-%Rem)
 - Inhibition Levels from Page 3-44 of EPA 833B87202 Be est @ 0.10 mg/l and Zinc Level from 04-19-2005 Inf analysis
 - lbs/day = (dry ton-sludge/day) * (2000 lbs-sludge/ton)*(lb-pollutant/10⁶ lbs-sludge)/%Rem = (dry tons/day * 2000/10⁶ * critria(mg/kg))/ % Rem;
Dry tons/day of sludge based on page 3 of checklist in Audit Report dated July 11, 2006.
 - lbs/day = mg/l * Flow * 8.34
 - lbs/day = (1 - SF) * MAHL
 - MAIL = Maximum allowable industrial loading = Allocation for % SF - Domestic
 - Rem Eff from Page 3-56 EPA 833B87202, Be & Mo est @ 50; Cu,Pb & Zn from "Rem" spreadsheet in this Workbook
 - The Department elected to use the design loading instead of the actual current POTW's peak loading (5108 lbs/day) capacity for CBOD as shown on the Conventional Pollutants spreadsheet for the month of Dec 2011.
The design loading is 4.0 MGD * 200 mg/l * 8.34 = 6672 lbs/day which is greater than the actual peak loading (5108 lbs/day) for the past twelve months.
The influent effluent data on the Conventional Pollutants sheet was provided to the Department (Torrence) in an email from the City (Redo) dated 5-30-2012.
Other options are also available if the City elects to develop limits; please refer to page 5-22 in "EPA Local Limits Development Guidance; 833-R-04-002A"
 - Since the City has not provided the Department with Domestic sampling for conventional pollutants, the Department elected to use the Ten States Standard BOD rate of 0.17 lb/day per capita (BOD is always equal to or greater than CBOD). The 2010 population of Van Buren was 23,000; therefore, the domestic load is 0.17 X 23,000 = 3910 lbs/day. The TSS domestic rate is 0.20 lb/day per capita (.2 X 23,000 = 4600 lbs/day).
Reference: Recommend Standards for Wastewater Facilities 2004 Edition (Ten States Standards); Section 11.253.a
 - The actual current peak loading for TSS removal is only 3504 lbs/day for the month Nov 2011. The Department elected to use the design loading for TSS at 4.0 MGD X 200 mg/l X 8.34 = 6672 lbs/day. Refer to Hawkins-Weir Project #04251 dated 11/14/2007.
The plant average only 266 lbs/day of TSS in the effluent; the allowable limit is 1000.8 lbs/day.
 - The Department elected to use the actual current maximum performance for NH3-N of 835 lbs/day (the design load is 4.0 MGD X 25 mg/l X 8.34 = 837 lbs/day)
Note that during the month of Mar 2012 the effluent average 151 lbs/day of NH3-N. The South plant has no limit for March but the limit for May - Oct is 166.8 lbs/day.
Referring to "EPA Design of Wastewater Treatment Facilities Major Systems", find in Table 2-2. Typical Characteristics of Domestic Sewage the average value of NH3-N at 15 mg/l. During the month of Mar 2012 the average flow was 3.187 MGD. The average domestic loading for NH3-N is 3.187 MGD X 15 mg/l X 8.34 = 398.7 lbs/day.