

Wilson, Tabatha

From: Torrence, Rufus
Sent: Wednesday, November 06, 2013 8:36 AM
To: darel@vbm.arcoxml.com
Cc: Kim Redo (kim@vbm.arcoxml.com); Wilson, Tabatha
Subject: FW: AFIN 17-00062 AR0021482; AFIN 17-00057 AR0037567; & AFIN 17-00565 AR0040967: City of Van Buren 2012 Annual Report Review
Attachments: VNBN TBLL Letter 20120806 A0000NZML.pdf; VNBN AR0040967_DMR Measurement Report_20131021.pdf; VNBN ICIS Code Form 20131022.docx; VNBN 2012 Annual Report C0000DQAC.pdf



October 21, 2013

Steve Dufresne, Director
City of Van Buren
P O Drawer 1269
Van Buren, AR 72956

Re: City of Van Buren 2012 Annual Report
(Tracking Permit No. AR0021482 AFIN 17-00062; AR0037567 AFIN 17-00057; & AR0040967 AFIN 17-00565)

Dear Mr. Dufresne:

The Department has reviewed the City's 2012 Annual Report. The report has deficiencies:

1. The City sampled only once for Table III parameters at the North Plant (AR0040967). The new permit issued on April 23, 2013 requires the city to sample the influent and effluent at least quarterly. See excerpt below from paragraph 7.C:

- C. The permittee shall analyze the treatment facility influent and the toxic pollutants listed in 40 CFR 122 Appendix D (NPDES Requirements) Table II at least once/year and the toxic pollutants quarterly (Jan-Mar, Apr-Jun, Jul-Sep & Oct-Dec). If, based upon

Since the City sampled the effluent at least four times for copper and zinc (see attached DMR report), the Department will accept the DMR data to satisfy this requirement for only this 2012 Annual Report. Please instruct your lab technician to sample the influent and effluent quarterly at the North Plant.

2. The City violated the WQ limit (85.53 µg/l) on July 17, 2013 by discharging wastewater with a zinc concentration of 110 µg/l.
3. In reference to the City's letter dated August 6, 2012, the City has concluded that local limits for all pollutants are not necessary at this time (metal finishers are excluded). The Department's understanding at this time is that the City wishes to reserve the right to place local limits for metals and cyanide in metal finisher permits and that all other SIUs are exempt from all local limits. Therefore, the City should discontinue placing non-metal finisher SIUs in SNC for local limit violations and should issue only NOV's to these SIUs until their permits expire. In other words, the City should not place SIUs in SNC for violating BOD and TSS limits and should remove local limits for BOD and TSS from future renewed permits.

The Department appreciates the City's continued efforts in annual reporting and the City will not be required to submit any additional information for the 2012 annual report.

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

Sincerely,



Rufus Torrence, Pretreatment Engineer
Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5301 NORTHSORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE (501) 682-0626
www.adeq.state.ar.us

VAN BUREN MUNICIPAL UTILITIES

Commission:
C.E. Dougan
John Barnwell
J.W. Floyd
Jim Williamson
Todd Young

"Providing Water, Sewer, and Sanitation Services"
2806 Bryan Road / P.O. Drawer 1269
Van Buren, Arkansas 72957
479-474-5067 / Fax 479-471-8969
Steve Dufresne, Director

Attorney
Paul Gant
Treasurer
Bryant Larcade
Secretary
Kathy Geppert

August 6, 2012

Mr. Rufus Torrence, Water Division Engineer
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: City of Van Buren (AFIN: 17-00062) NPDES # AR0021482)
Pretreatment Program Audit & Municipal Pollution Prevention (P2) Assessment

Dear Mr. Torrence:

The Van Buren Municipal Utilities has reviewed the above referenced audit/assessment and have the following responses:

B) FINDINGS WITH REQUIRED ACTIONS

1) Calculations of Headworks Loadings reflect that the development of local limits is not necessary at this time.

C) RECOMMENDED POTW ACTIONS

1) Calculations of Headworks Loadings reflect that the development of local limits is not necessary at this time.

2) Derivation of mass limits has been removed from the River City Coating permit.

3) VBMU staff has requested a proposal from FTN Associates to develop a WER for the North Plant, and have requested information from ADEQ. (Letter attached)

4) There are two main pump stations that discharge into the South Plant, 4th Street Pump Station and S. 28th Street Pump Station. We are adjusting the 4th Street Pumping Station Variable Speed Pumps to achieve a more consistent flow. A new pump station is currently under construction at South 28th Street and is scheduled for completion sometime by the end of 2012; the new pump station will be equipped with variable speed pumps. We believe the ability to control influent flow into the South Plant will result in a more steady organic loading and may assist with nitrification and denitrification. Also, plant operators are working on more education in this area and working with the Pretreatment/Environmental Coordinator.

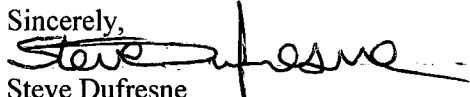
5) At this time, we feel it is best to leave BOD and TSS limits in the Metal Finishers permits.

**C) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED
PRETREATMENT PROGRAM**

1) Calculations of Headworks Loadings reflect that the development of local limits is not necessary at this time.

We trust this response will be satisfactory for your review, if you have any questions or require further information please contact us.

Sincerely,



Steve Dufresne
Director of Utilities

Cc: Correspondence file
Darel Manus, Operations Superintendent
Kim Redo, Pretreatment/Environmental Coordinator

COPY

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Attorney
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Secretary
Kathy Geppert

July 18, 2012

Mr. Kevin Suel
Enforcement Analyst
Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: NPDES AR0040967, AFIN: 17-00565
Van Buren, Arkansas, North Plant
Copper and Zinc

Dear Mr. Suel:

The staff and administration of Van Buren Municipal Utilities has diligently searched for sources of controllable contributions of copper and zinc into the North Plant collection system as well as investigating other measures to meet the discharge limits set for this treatment facility.

We have contended that the receiving stream is in fact backwater from the Arkansas River but also understand the rigid premise used by ADEQ to set the limits.

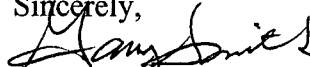
— Please be advised that we have continued with our investigation and believe that the copper and zinc contributions are background from the domestic sewage system. We would like to determine if there is a legitimate basis for a more lenient concentration limit.

It is our understanding that the Water Effects Ration (WER) is one such potential basis for which there is precedence. We understand that there are EPA guidelines for a streamlined methodology for copper and that similar methodology may be developed or justified for zinc.

On that remise the VBMU engaged the assistance of FTN-Associates to evaluate the potential for justification of discharge limits based on the WER. To date a Biotic Ligand Model (BLM) was evaluated and the model developed gives credibility to a potential favorable WER based limit for copper that is achievable and the same may hold true for zinc.

Before undergoing the expense to determine if the WER for copper and zinc could justify revised effluent limits, we wish to know if ADEQ would consider revising the effluent limits on that basis or your reasoning if such is not considered to be a valid proposition.

Sincerely,



Gary Smith
Director of Utilities

Cc: Steve Dufresne, Director I.T.
Darel Manus, Operations Superintendent
Larry Weir, P.E.

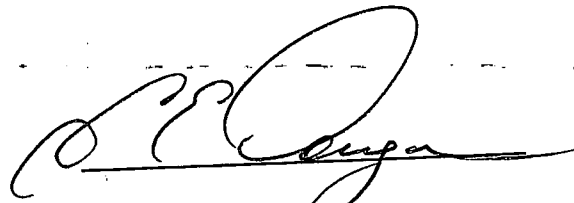
RESOLUTION

A RESOLUTION, granting authority to sign documents for the Van Buren
Municipal Utilities Department.

WHEREAS, Gary Smith Retires from the Van Buren Municipal Utilities
effective August 31, 2012.

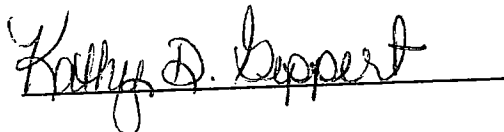
NOW THEREFORE, be it resolved, the Van Buren Municipal Utilities
Commission does hereby authorize Steve Dufresne to execute and sign
on behalf of the Department, all documents necessary to the continued
operation of the Department.

PASSED AND APPROVED this 11th day of July 2012.



C.E. Dougan, Chairman

ATTEST:



Kathy D. Geppert, Secretary

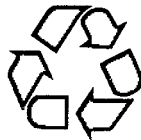
VAN BUREN MUNICIPAL UTILITIES

Providing Water, Sewer and Solid Waste Services

2806 Bryan Road

P.O. DRAWER 1269

VAN BUREN, ARKANSAS 72957



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Mr. Rufus Torrence, Water Division Engineer
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

721185317 8018



Measurement Report with Limits 10/21/13

VAN BUREN, CITY OF-NORTH WWTP AR0040967, Expiration: 4/30/18

001A

Copper, total recoverable 01119 Monitoring Location = 1

Limit Start Date = 03/01/2011 Limit End Date = 02/28/2013
 Season 0 (-Jan--Feb--Mar--Apr--May--Jun--Jul--Aug--Sep--Oct--Nov--Dec-)

	.15	9.2	18.5
	lb/d Q1	ug/L C2	ug/L C3
	MO AVG	MO AVG	7 DA AVG
11/30/2012	0.08	17.5	38
12/31/2012	0.12	18	25
01/31/2013	0.08	10.3	14
02/28/2013	0.13	9.7	11
03/31/2013	0.06	7.5	7.5
04/30/2013	0.12	6.7	6.7

Limit Start Date = 05/01/2013 Limit End Date = 04/30/2018
 Season 0 (-Jan--Feb--Mar--Apr--May--Jun--Jul--Aug--Sep--Oct--Nov--Dec-)

	.15	9.2	18.5
	lb/d Q1	ug/L C2	ug/L C3
	MO AVG	MO AVG	7 DA AVG
05/31/2013	0.04	6.4	6.4
06/30/2013	0.09	8.9	13
07/31/2013	0.04	6.3	6.3
08/31/2013	0.02	4.1	4.1
09/30/2013	Not Received	Not Received	Not Received

Zinc, total recoverable 01094 Monitoring Location = 1

Limit Start Date = 03/01/2011 Limit End Date = 02/28/2013
 Season 0 (-Jan--Feb--Mar--Apr--May--Jun--Jul--Aug--Sep--Oct--Nov--Dec-)

	1.43	85.5	171.6
	lb/d Q1	ug/L C2	ug/L C3
	MO AVG	MO AVG	7 DA AVG
11/30/2012	0.71	148.1	280
12/31/2012	0.88	130	220
01/31/2013	0.51	73.3	76
02/28/2013	0.53	49	50
03/31/2013	0.35	45	45
04/30/2013	0.67	39	39

Limit Start Date = 05/01/2013 Limit End Date = 04/30/2018
 Season 0 (-Jan--Feb--Mar--Apr--May--Jun--Jul--Aug--Sep--Oct--Nov--Dec-)

	1.43	85.5	171.6
	lb/d Q1	ug/L C2	ug/L C3
	MO AVG	MO AVG	7 DA AVG
05/31/2013	0.51	62.5	86
06/30/2013	0.58	44.6	69
07/31/2013	1.36	222.5	222.5
08/31/2013	0.52	89.9	89.9
09/30/2013	Not Received	Not Received	Not Received

PPS Program Report

NPDES Tracking Permit No.

Permittee Name:

Second NPDES Permit No.

Date: 10/22/2013

Third NPDES Permit No.

Reviewing Engineer:

Report Type:

Report Information

Pretreatment Performance Summary Start 10/1/2012

Significant Industrial Users (SIUs)

SIUs:

SIUs Without Control Mechanism:

SIUs Not Inspected:

SIUs Not Sampled:

SIUs in SNC with Pretreatment Standards:

SIUs in SNC with Reporting Requirements:

SIUs in SNC with Pretreatment Schedule:

SIUs in SNC Published in Newspaper:

SIUs Schedules:

Violation Notices Issued to SIUs:

Administrative Orders Issued to SIUs:

Civil Suits Filed Against SIUs:

Criminal Suits Filed Against SIUs:

Categorical Industrial Users (CIUs)

CIUs:

CIUs in SNC:

Penalties

Dollar Amount of Penalties Collected

Industrial Users (IUs) from which Penalties have been collected