

**Torrence, Rufus**

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**From:** Torrence, Rufus  
**Sent:** Friday, November 13, 2009 2:05 PM  
**To:** 'KimRedo@aol.com'  
**Subject:** AFIN 17-00062 AR0021482 City of Van Buren 2008 Annual Report



November 12, 2009

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

Re: City of Van Buren 2008 Annual Report  
(Permit No. AR0021482, AFIN 17-00062)

Dear Mr. Smith:

The Department has reviewed the City's 2008 Annual Report and has the following concerns:

1. The City did not submit all the required analysis. The influent analyses at the South (Main) plant for Mercury were missing for all four quarters. The City must also test the influent at the Main plant for Mercury.
2. The City is required to test for all Table III parameters. Unfortunately, Table III presently does not include Molybdenum. Molybdenum is one of the specified fifteen parameters in EPA guidance for local limits, and the City should also monitor for Molybdenum.
3. The City did a good job in submitting all the required elements
  - Cover Letter
  - List of SIUs in SNC (If applicable)
  - Influent/Effluent Chart
  - Attachment A (Updated SIU List)
  - Attachment B (Enf Actions)
  - Attachment C (PPS)

However, please do not send the Department the lab reports. The City should retain these reports in the POTW files.

4. The MAHCs (Maximum Allowable Headworks Concentrations) were not shown on the influent/effluent chart. Please refer to the Department's letter dated January 30, 2009

with the attached spreadsheets. The spreadsheets show the derivation of the MAHCs. The Department has attached charts with the current MAHCs. Please use these charts for future reports.

5. The City did not list the data correctly on the charts. Referring to Allen's email (attached) dated 1-14-09, please list all non-detects (at or below the EPA MQL) as zero. Even though Allen's email did not specifically state influent, please list this data similarly. Please show all MAHCs, lab results, and levels in only micrograms/liter ( $\mu\text{g/l}$ ) on the influent/effluent chart.

The Department appreciates the City's continued efforts in annual reporting. The City will not be required to submit any additional information for the 2008 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](mailto:torrence@adeq.state.ar.us).

Sincerely,

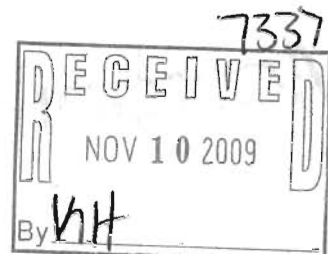
A handwritten signature in black ink, appearing to read "Rufus Torrence". The signature is written in a cursive style with a large initial "R".

Rufus Torrence,  
ADEQ Engineer

RT

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

GARY SMITH, MANAGER  
(479) 474-5067  
FAX (479) 471-8969



October 28, 2009

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: Annual Pretreatment Report

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  
(Table II analyses attached)
- III. Influent-Effluent Chart for North Plant  
(Table II analyses attached)
- III. Attachment A -- PPS Report Updated SIU List
- IV. Attachment B -- Significant Violations – Enforcement Action
- V. Attachment C – PPS (1<sup>st</sup> page)
- VI. Attachment C – PPS (2<sup>nd</sup> page)

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

Sincerely,

Gary Smith  
Director

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

"Original" ①

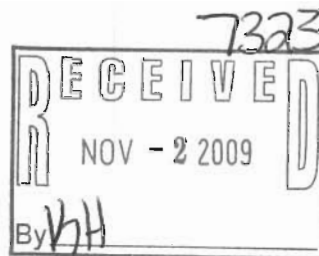
① Van Buren submitted two reports (original & copy)

BT

**VAN BUREN MUNICIPAL UTILITIES**

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Sincerely,

*Gary Smith*  
Gary Smith  
Director

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

"Copy" ①

CITY OF VAN BUREN  
WASTEWATER PRE-  
TREATMENT 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 in 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 for 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) 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 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 noncompliance;

(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 July 1, 2008 through January 31, 2009 are as follows:

Industry

Tate & Lyle

Reasons for Significant NonCompliance classifications:

(A) Total Suspended Solids, Biochemical Oxygen Demand excursions

Published in the September 19, 2009 issues of the Press Argus-Courier.

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: Oct. 1, 2008 TO Sept. 30, 2009**  
**TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0021482**  
**AVERAGE POTW FLOW: 2,524 MGD % IU FLOW: 27.2 %**

METALS, CYANIDE and PHENOLS (Total)	MAHC mg/L (2)	INFLUENT DATES SAMPLED (mg/L) Once/quarter				WQ level/ limit mg/l (2)	EFFLUENT DATES SAMPLED (mg/L) Once/quarter				LABORATORY ANALYSIS		
		10/29/08	2/19/09	5/27/09	7/8/09		10/29/08	2/19/09	5/27/09	7/8/09	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
Antimony	N/A	ND	ND	ND	ND	N/A	ND	ND	ND	ND	60	200.8	60
Cadmium	54.1	0.65 -0.00065	ND	0.62 -0.00062	0.57 -0.00057	ND	ND	ND	ND	ND	0.5	200.8	0.5
Copper	1000.0	6.8 0.060	4.4 0.044	1.1 0.011	1.2 0.012	5.7 0.057	5.8 0.058	6.9 0.069	2.6 0.026	2.6	0.5	200.8	0.5
Lead	587.2	1.9 -0.019	3.3 0.033	2.6 0.026	2 0.02	1.6 0.016	1.9 0.019	1.9 0.019	1.4 0.014	1.4	0.5	200.8	0.5
Mercury	0.98	—	—	—	—	0.514 +4	0.012 -12	0.086 8.6	0.005 -5	0.005	.005	EPA 245.7	0.0018 -1.8mg/L
Nickel	4264	3.64 0.00064	4.8 0.048	5.9 0.059	5.9 0.059	3.3 0.0033	3.8 0.0038	5.5 0.0055	3.9 0.0039	3.9	0.5	200.8	0.5
Selenium	85.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	5	200.8	5
Silver	250.0	1.1 0.011	1.2 0.012	0.96 0.0096	2.9 0.029	ND	ND	ND	2.7 0.027	2.7	0.5	200.8	0.5
Zinc	300.0	1.2 -0.120	1.3 -0.130	1.5 -0.150	1.0 -0.100	3.9 0.039	3.8 0.038	5.5 0.055	2.8 0.028	2.8	20	200.8	20
Chromium	1000.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	200.8	10
Cyanide	100.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	10	SM4500- CN.C.E	10 -0.01 mg/L
Arsenic	71.0	0.89 *	ND	ND	ND	—	—	—	—	—	0.5	200.8	0.5
Molybdenum	64.0	8.4	7.8	9.6	—	—	—	—	9.9	9.9	--	—	—
Phenols	N/A	-0.084	<0.020	0.096	—	ND	5.8 -0.060	ND	0.0999	0.0999	5	EPA 420.1	0.005 mg/L
Beryllium	100.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5
Thallium	N/A	ND	ND	ND	ND	N/A	ND	ND	ND	ND	0.5	200.8	0.5
Flow, MGD	N/A	2,268	2,579	2,769	2,018	2,268	2,579	2,549	2,060	2,060			
(3)													
Toluene					12								

\* Outlier for Arsenic; show "ND" for 16-29-08 analysis

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: Oct. 1, 2008 TO Sept. 30, 2009**  
**TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0040967**  
**AVERAGE POTW FLOW: 1.103 MGD % IU FLOW: 0.67 %**

METALS, CYANIDE and PHENOLS (Total)	MAHC mg/l (2)	6/16/09	INFLUENT DATES SAMPLED				WQ level/ limit mg/l (2)	6/16/09	EFFLUENT DATES SAMPLED				LABORATORY ANALYSIS			
			(mg/d) Once/quarter						(mg/l) Once/quarter				EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)	
Antimony	N/A	ND	0			N/A	ND	0				60	200.8	60		
Cadmium	5.6	ND	0				ND	0				0.5	200.8	0.5		
Copper	31.8	2.6	0.026				7.9	0.079				0.5	200.8	0.5		
Lead	18.8	1.8	0.018				0.77	0.0077				0.5	200.8	0.5		
Mercury	0.03	0.011	0.011				0	0				0.005	EPA 245.7	1.8 mg/L		
Nickel	167.2	5.2	0.0052				4.9	0.0049				0.5	200.8	0.5		
Selenium	11.2	ND	0				ND	0				5	200.8	5		
Silver	3.7	ND	0				ND	0				0.5	200.8	0.5		
Zinc	167.7	148	0.148				68	0.068				20	200.8	20		
Chromium	749.0	ND	0				ND	0				10	200.8	10		
Cyanide	18.7	ND	0				ND	0				10	SM4500- CN C.E	0.01 mg/L		
Arsenic	34.1	2.2	0.0022				2.2	0.0022				0.5	200.8	0.5		
Molybdenum	36.7	2.9	0.0029				ND	0				-				
Phenols	N/A	ND	0				ND	0				5	EPA 420.1	0.005 mg/L		
Beryllium	11.8	ND	0				ND	0				0.5	200.8	0.5		
Thallium	N/A	ND	0				ND	0				0.5	200.8	0.5		
Flow, MGD	N/A	0.838					0.838									
(3)																
Bis(2-ethylhexyl) phthalate		88					8.4									

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	9/16/09	no	1	1*	yes	n/a	C	C	C
✓ FabTech	3400	Categorical	Y	9/16/09	no	1	2	yes	n/a	C	C	C
✓ River City Coatings	1721	Categorical	Y	9/16/09	no	1	2	yes	n/a	C	C	C
✓ Simmons Foods	2015	Noncategorical	Y	4/16/08	no	1	10	yes	n/a	n/a	C	NC
✓ Simmons Poultry Farms	2017	Noncategorical	Y	12/01/06	no	1	4	yes	n/a	n/a	C	C
✓ Tate & Lyle	2046	Noncategorical	Y	5/31/07	no	1	10	yes	n/a	n/a	C	NC
✓ Tyson Foods	2017	Noncategorical	Y	11/30/06	no	1	6	yes	n/a	n/a	NC	C
✓ Van Buren Pipe Co.	3084	Noncategorical	Y	7/12/08	no	1	1**	yes	n/a	n/a	C	C
✓ Arkansas Valley Truck Wash of America	7542	Noncategorical	Y	12/30/06	no	1	4	yes	n/a	n/a	C	C

\* Arkansas Lamp Mfg. - no discharge so sampling not possible

\*\* Van Buren Pipe closed in December 2008

Permits modified to reflect wording changes as per ADEQ audit requirements: Arkansas Lamp, FabTech, and River City Coatings



SIGNIFICANT VIOLATORS -- ENFORCEMENT ACTIONS TAKEN  
ATTACHMENT B

INDUSTRIAL USER	NATURE VIOLATION	OF	NUMBER OF ACTIONS TAKEN					COMPLIANCE SCHEDULE			PENALTIES DATE DATE	CURRENT	STATUS	COMMENTS
			REPORTS	LIMITS	N.O.V.	A.O.	CIVIL	CRIMINAL	OTHER	COLLECTED				
Tate & Lyle		126X	9	0	0	0	0	0	0	yes	n/a	n/a	C	BOD, -TSS excursions
Simmons Foods		1X	1	0	0	0	0	0	0	yes	n/a	n/a	C	BOD excursion
Tyson Foods		1X	1	0	0	0	0	0	0	no	n/a	n/a	C	*

\*Oil & Grease: bottles collected but not tested and reported due to breakage (isolated incident)

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 Gary Smith Director  
(Position)

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

NPDES Permit Nos. AR0021482 & AR0040967

Reporting Period October 1, 2008 September 30, 2009  
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 3

Total Number of Significant Noncategorical IUs 6

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS

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

Compliance Monitoring Program

1) No. of Control Documents Issued/Total No. Required.....	<u>3/3</u>	<u>6/6</u>
2) No. of Nonsampling Inspections Conducted.....	<u>3/3</u>	<u>6/6</u>
3) No. of Sampling Visits Conducted.....	<u>5/3</u>	<u>36/6</u>

4)	No. of Facilities Inspected (nonsampling).....	<u>3/3</u>	<u>5/6*</u>
5)	No. of Facilities Sampled.....	<u>3</u>	<u>6</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>1</u> <u>11</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).....	<u>\$0</u> <u>\$56,874.00/2</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  Date 10-28-09

\*Van Buren Pipe closed in November 2008

# PPS Program Report

\* NPDES ID: AR 0021487 Permittee's Name Van Buren

\* Report Received/Event Date: 11-02-2009 Date 11-09-09

Report Type

- Biosolids Program Report
- CAFO Annual Report
- CSO Event Report
- Local Limits Report
- MS4 Program Report

- Pretreatment Performance Summary Report
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

### Report Information

\* Pretreatment Performance Summary Start Date: 10-01-2008

### Significant Industrial Users (SIUs)

- SIUs: 8
- SIUs Without Control Mechanism: 0
- SIUs Not Inspected: 0
- SIUs Not Sampled: 0
- SIUs in SNC with Pretreatment Standards: 1
- SIUs in SNC with Reporting Requirements: 0
- SIUs in SNC with Pretreatment Schedule: 0
- SIUs in SNC Published in Newspaper: 1
- SIUs Schedules: 0
- Violation Notices Issued to SIUs: 12
- Administrative Orders Issued to SIUs: 0
- Civil Suits Filed Against SIUs: 0
- Criminal Suits Filed Against SIUs: 0

### Categorical Industrial Users (CIUs)

- CIUs: 3
- CIUs in SNC: 0

### Penalties

Dollar Amount of Penalties Collected: \$ 0

Industrial Users (IUs) from which Penalties have been collected: 0

### Other Information

SUO Reference: 6-1990

SUO Date: 03-19-1990

Annual Pretreatment Budget: \$           

Pass-Through/Interference Indicator:

Violation of IU Schedule for Remedial Measures:  No

Timely Response to Violation of IU Schedule for Remedial Measures:

### Local Limits

Date of Most Recent Technical Evaluation & or Local Limits: 01-30-2008

Date of Most Recent Adoption of Technically Based Local Limits: X

Local Limit Pollutants: X

### Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval: X

Removal Credits: X

### Acceptance of Waste

Acceptance of Hazardous Waste:  No

Acceptance of Non-Hazardous Industrial Waste:  No

Acceptance of Hauled Domestic Wastes:  No

### Deficiencies

Deficiencies Identified During IU File Review:  No

Control Mechanism Deficiencies:  No

Legal Authority Deficiencies:  No

Deficiencies in Data Management and Public Participation:  No

Deficiencies in Interpretation and Application of Pretreatment Standards:  No

Inadequacy of Sampling and Inspections:  No

Adequacy of Pretreatment Resources:  Yes

### Annual Frequency

Annual Frequency of Influent Toxicant Sampling: 4

Annual Frequency of Effluent Toxicant Sampling: 4

Annual Frequency of Sludge Toxicant Sampling: 1