

Torrence, Rufus

From: Torrence, Rufus
Sent: Thursday, November 04, 2010 2:33 PM
To: Gary Smith (vbeasy@aol.com); Kim Redo (kimredo@aol.com)
Subject: AFIN 17-00062 AR0021482 City of Van Buren 2009 Annual Report



ARKANSAS
Department of Environmental Quality

November 4, 2010

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 2009 Annual Report. The report had the required analyses and the Department will deem the report as "complete". However, some essential elements were missing:

1. The required elements of a complete report are shown below:
 - Cover Letter
 - List of SIUs in SNC (If applicable)
 - Influent/Effluent Charts with required analyses
 - Attachment A (Updated SIU List)
 - Attachment B (Enf Actions)
 - Attachment C (PPS)

The City did not submit Attachment B with the 2009 report even though the cover letter indicates otherwise (The City submitted two copies of Attachment A). The Department cannot determine which SIUs were issued the 14 NOVs shown on Attachment C. In the future please show all enforcement actions on Attachment B.

Please do not show "surcharges" on Attachment C. The City listed "\$8,339.00/5" in the space reserved for "penalties".

2. 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 (The 2008 report had this same deficiency and this same paragraph was in the Department's letter dated November 12, 2009).

3. Referring to Allen's email (attached) dated 1-14-09 and revised on 1-26-09, 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. The charts in the 2008 report also listed "ND" instead of "0" (zero).

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 2009 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 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72318-5517 / TELEPHONE 501-682-0744 / FAX 501-682-0880
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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 27, 2010

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
- 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,

Gary Smith
Director

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

- ① inf-eff logged
- ② ICIS coded
- ③ IU's checked
- ④ "Annual Report" form updated

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: Oct. 1, 2009 TO Sept. 30, 2010

TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0040967

AVERAGE POTW FLOW: 1,199 MGD % IU FLOW: 0.71 %

METALS, CYANIDE and PHENOLS (Total)	MAHC mg/l (2)	INFLUENT DATES SAMPLED (ug/l) (unless otherwise noted) Once/year		WQ level/limit mg/l (2)	EFFLUENT DATES SAMPLED (ug/l) Once/year		LABORATORY ANALYSIS		
		5/4/10	5/9/10		5/4/10	5/9/10	EPA MQL (ug/l) (1)	EPA Method Used (1)	Detection Level Achieved (ug/l)
Antimony	N/A	ND	ND	N/A	ND	ND	60	200.8	60
Cadmium	5.6	ND	ND		ND	ND	0.5	200.8	0.5
Copper	31.8	12			6.6		0.5	200.8	0.5
Lead	10.8	1.1			ND	ND	0.5	200.8	0.5
Mercury	0.03	8.1 ng/L			ND	ND	.005	EPA 245.7	1.8 ng/L
Nickel	167.2	3.6			3.2		0.5	200.8	0.5
Selenium	11.2	ND	ND		ND	ND	5	200.8	5
Silver	3.7	ND	ND		ND	ND	0.5	200.8	0.5
Zinc	167.7	78			58		20	200.8	20
Chromium	749.0	ND	ND		ND	ND	10	200.8	10
Cyanide	18.7	ND	ND		ND	ND	10	SM4500-CN C.E	0.01 mg/L
Arsenic	34.1	ND	ND		ND	ND	0.5	200.8	0.5
Molybdenum	30.7			N/A			--		
Phenols	N/A	47ug/L		N/A	ND	ND	5	EPA 420.1	0.005 mg/L
Beryllium	11.8	ND	ND		ND	ND	0.5	200.8	0.5
Thallium	N/A	ND	ND	N/A	ND	ND	0.5	200.8	0.5
Flow, MGD (3)	N/A	0.812	0.916	N/A	0.812	0.916			

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: Oct. 1, 2009 TO Sept. 30, 2010

TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0021482

AVERAGE POTW FLOW: 2.492 MGD % IU FLOW: 30.2 %

METALS, CYANIDE and PHENOLS (Total)	MAHC ug/l (2)	INFLUENT DATES SAMPLED (ug/l) Once/quarter				WQ level/ limit mg/l (2)	EFFLUENT DATES SAMPLED (ug/l) Once/quarter				LABORATORY ANALYSIS		
		11/13/09	2/17/10	4/27/10	8/10/10		11/13/09	2/17/10	4/27/10	8/10/10	EPA MQL (ug/l) (1)	EPA Method Used (1)	Detection Level Achieved (ug/l) Unless noted
Arsenic	71.0	ND	ND	ND	1.2	ND	ND	ND	0.62	0.5	200.8	0.5	
Chromium	1000.0	ND	ND	ND	ND	ND	ND	ND	ND	10	200.8	10	
Cyanide	100.0	ND	ND	ND	ND	ND	ND	ND	ND	10	SM4500- CN C.E	0.01 mg/L	
Lead	587.2	0.019	0.0033	0.0026	0.002	0.016	0.0019	0.0019	0.0014	0.5	200.8	0.5	
Mercury (ug/L)	0.98	0.094	0.017	ND	ND	0.011	0.0058	0.044	ND	.005	EPA 245.7	1.8ug/L	
Nickel	426.4	5.8	5.3	4.8	6.1	2.80	2.60	3.50	3.50	0.5	200.8	0.5	
Selenium	85.2	ND	ND	ND	ND	ND	ND	ND	0.0027	0.5	200.8	0.5	
Silver	250.0	0.51	ND	1.40	8.30	ND	ND	ND	0.0027	0.5	200.8	0.5	
Zinc	300.0	200	120	110	170	34	36	46	23	20	200.8	20	
Phenols	N/A	0.24	0.26	0.26	0.51	ND	ND	ND	0.0095	5	EPA 420.1	0.005 mg/L	
Beryllium	100.0	ND	ND	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5	
Thallium	N/A	ND	ND	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5	
Flow, MGD (3)	N/A	2.551	2.605	2.089	2.073	2.195	2.658	1.881	2.05				

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	10/09/08	no	1	1*	yes	n/a	C	C	C
FabTech	3400	Categorical	Y	3/1/10	no	1	2	yes	n/a	C	C	C
River City Coatings	1721	Categorical	Y	9/19/10	no	1	2	yes	n/a	C	C	C
B & W Plating	1721	Noncategorical	Y	11/17/09	yes	1	3*	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	12/01/08	no	1	4	yes	n/a	n/a	C	NC
Tate & Lyle	2046	Noncategorical	Y	6/1/10	no	1	12	yes	n/a	n/a	C	NC
Tyson Foods	2017	Noncategorical	Y	12/1/09	no	1	5	yes	n/a	n/a	NC	NC
Arkansas Valley Truck Wash of America	7542	Noncategorical	Y	1/1/09	no	1	4	yes	n/a	n/a	C	NC

*Lacked one visit due to extremely low or no discharge (sampling events conducted but no samples collected)
 Permits modified to reflect wording changes as per ADEQ audit requirements: Arkansas Lamp, FabTech, and River City Coatings

PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT USERS LIST
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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	10/09/08	no	1	1*	yes	n/a	C	C	C
FabTech	3400	Categorical	Y	3/1/10	no	1	2	yes	n/a	C	C**	C
River City Coatings	1721	Categorical	Y	9/19/10	no	1	2	yes	n/a	C	C	C
B & W Plating	1721	Non categorical	Y	11/17/09	yes	1	3*	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	12/01/08	no	1	4	yes	n/a	n/a	C	NC
Tate & Lyle	2046	Noncategorical	Y	6/1/10	no	1	12	yes	n/a	n/a	C	NC
Tyson Foods	2017	Noncategorical	Y	12/1/09	no	1	5	yes	n/a	n/a	NC	NC
Arkansas Valley Truck Wash of America	7542	Noncategorical	Y	1/1/09	no	1	4	yes	n/a	n/a	C	NC

*Lacked one visit due to extremely low or no discharge (sampling events conducted but no samples collected)
 Permits modified to reflect wording changes as per ADEQ audit requirements: Arkansas Lamp, FabTech, and River City Coatings

**Due to extremely low flow FabTech was unable to conduct 2nd sampling event as per permit requirement

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, 2009 September 30, 2010
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 4

Total Number of Significant Noncategorical IUs ~~0~~ 5

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>
1) No. of SIUs submitting BMRs/Total No. Required.....	<u>4/4</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>4/4</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>0/4</u>	<u>0/5</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>4/4</u>	<u>5/5</u>
2) No. of Nonsampling Inspections Conducted.....	<u>4/4</u>	<u>5/5</u>
3) No. of Sampling Visits Conducted.....	<u>8/4</u>	<u>35/5</u>

4)	No. of Facilities Inspected (nonsampling).....	<u>4/4</u>	<u>5/5</u>
5)	No. of Facilities Sampled.....	<u>4</u>	<u>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>0</u>	<u>14</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>0</u>
7)	Amount of Penalties Collected (total dollars/ IUs Assessed) (Not Surcharges).....	<u>\$0</u>	<u>\$8,339.00/5</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 10-27-10

PPS Program Report

* NPDES ID: AR0021482 Permittee's Name Van Buren

* Report Received/Event Date: 10/20/2010

Date 11-3-2010

Report Type

Please select a Program Report to add.

- 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: 10-01-2009

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:

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Adherence to IU Schedule for Remedial Measures:

Local 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: Not Applicable

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: