

Torrence, Rufus

From: Torrence, Rufus
Sent: Tuesday, November 01, 2011 10:47 AM
To: Gary Smith (vbeasy@aol.com)
Cc: Kim Redo (kimredo@aol.com)
Subject: FW: AFIN 17-00062 AR0021482 & AFIN 17-00565 AR0040967 City of Van Buren 2010 Annual Report



ARKANSAS
Department of Environmental Quality

November 1, 2011

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

Re: City of Van Buren 2010 Annual Report
(Permit No. AR0021482, AFIN 17-00062 & AR0040967, AFIN 17-00565)

Dear Mr. Smith:

The Department has reviewed the City's 2010 Annual Report. The report is complete. However, the Department has concerns:

1. The North Plant (AR0040967) effluent copper concentration (10 μ g/l) exceeded the Water Quality Limit (9.24 μ g/l) shown on the influent-effluent chart. In reference to Part II.A.4, the City is expected to comply with Regulation #2 standards "*even if the permit has not yet been modified to incorporate the requirement*". The City is expected to be currently attempting to abate or control the source of Copper entering the North Plant. Note the Part I.A has report requirements for both Copper and Zinc.
2. Some of the MAHCs (Maximum Allowable Headworks Concentrations) shown on the influent/effluent charts are not the currently approved MAHCs. The City has listed some MAHCs attached to Van Buren's letter dated June 28, 2011. The Department has not approved the June 2011 MAHCs (which include BOD₅, TSS, etc.). Please refer to the Department's letter dated January 30, 2009 with attached spreadsheets (the letter and spreadsheets are shown on ADEQ website under permit


#AR0021482). These spreadsheets show the currently approved MAHCs which do not include conventional pollutants.

3. Several pretreatment cities have submitted headwork analyses for conventional pollutants. The Department is working on guidance for MAHL development for conventional pollutants. To encourage consistent development from city to city the Department will share the guidance with all cities required to develop new MAHLs for conventional pollutants when the guidance is finalized. Van Buren is currently enforcing local limits in SIU permits for BOD₅ and TSS. The City may continue to enforce these “conventional” local limits until new MAHLs are approved.

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 2010 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
3301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72315-5517 / TELEPHONE 501-682-0744 / FAX 501-687-0880
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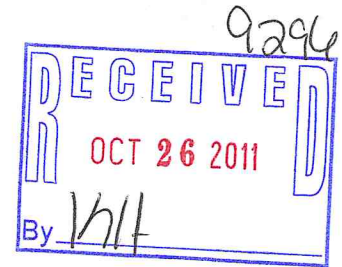
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VAN BUREN MUNICIPAL UTILITIES
 PROVIDING WATER, SEWER AND SOLID WASTE SERVICES
 2806 BRYAN ROAD
 PO DRAWER 1269

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

October 21, 2011

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 2010

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 Update

Scanned

OCT 26 2011

Mailroom

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: Oct. 1, 2010 TO Sept. 30, 2011
TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0040967
AVERAGE POTW FLOW: 1.094 MGD % IU FLOW: 0.39 %

METALS, CYANIDE and PHENOLS (Total)	MAHC (µg/l) (2)	INFLUENT DATES SAMPLED				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED				LABORATORY ANALYSIS		
		(µg/l) Once/year					(µg/l) Once/year				EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
Antimony	N/A	0				N/A	0				60	200.8	60
Cadmium	5.58	0				1.84	0				0.5	200.8	0.5
Copper	16.80	26				9.24	10				0.5	200.8	0.5
Lead	5.89	1.2				2.71	0				0.5	200.8	0.5
Mercury	0.06	39 ng/L				0.0134	0				.005	EPA 245.7	0.0018
Nickel	108.94	9.1				96.96	5.5				0.5	200.8	0.5
Selenium	*	0				5.58	0				5	200.8	5
Silver	3.72	0.82				0.93	0				0.5	200.8	0.5
Zinc	115.58	83				85.53	70				20	200.8	20
Chromium, total	737.73	14				11.81(hex) 295.4(tri)	0				10	200.8	10
Cyanide	*	0				5.80	0				10	SM4500- CN CE	0.00001
Arsenic	*	0				348.96	0				0.5	200.8	0.5
Molybdenum	302.5										--		
Phenols	*	8					8				5	EPA 420.1	0.00005
Beryllium	11.82					5.91	0				0.5	200.8	0.5
Thallium	*					N/A	0				0.5	200.8	0.5
Flow, MGD	N/A	0				N/A							
(3)													

* The effluent non-detects on [dates] represent our laboratory's lowest achievable MQLs

*No MAHC's calculated for these parameters

(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.

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: Oct. 1, 2010 TO Sept. 30, 2011

TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0021482

AVERAGE POTW FLOW: 2.221 MGD % IU FLOW: 31.7 %

METALS, CYANIDE and PHENOLS (Total)	MAH C (µg/l) (2)	INFLUENT DATES SAMPLED				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED				LABORATORY ANALYSIS		
		11/17/10	2/15/11	5/17/11	7/12/11		11/17/10	2/15/11	5/17/11	7/12/11	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		Once/quarter					Once/quarter						
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8	60
Cadmium	56.78	0	0.57	0.59	0	126.52	0	0	0	0	0.5	200.8	0.5
Copper	1000.00	15	11	9.2	36	431.63	3.5	2.7	1.5	2.3	0.5	200.8	0.5
Lead	488.27	2.0	2.1	1.3	3.1	587.66	0.67	0.54	0	0	0.5	200.8	0.5
Mercury (ng/L)	0.98µg/l	31 ng/L	0	0.98 ng/L	0	0.39 ng/L	3.9 ng/L	2.7 ng/L	3.7 ng/L	0	.005	EPA 245.7	1.8 ng/L
Nickel	427.2	4.1	6.2	5.4	6.4	15071.86	3.1	3.2	3.5	4.1	0.5	200.8	0.5
Selenium	85.2	0	5.5	6.3	0	137.76	0	5.8	6.3	0	5	200.8	5
Silver	250.0	2.1	1.3	0	2.2	112.58	0	0	0	0	0.5	200.8	0.5
Zinc	3000.0	140	110	100	190	3461.17	42	55	25	20	20	200.8	20
Chromium, total	1000.00	0	0	0	0	22680.2	0	0	0	0	10	200.8	10
Cyanide	10*	0	0	0	0	154.01	0	0	0	0	10	SM4500-CN CE	0.01 mg/L
Arsenic	71*	0	1.6	1.4	1.7	4807.76	0.92	1.5	1.9	1.6	0.5	200.8	0.5
Molybdenum	67.14	---	0	0	0	N/A	0	0	0	0	--	200.8	0.5
Phenols	N/A	0.08	0.023	0.036	0.041	N/A	0	0	0	0	5	EPA 420.1	5
Beryllium	1000.0	0	0	0	0	173.41	0	0	0	0	0.5	200.8	0.5
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	1.926	2.629	2.624	1.818	N/A	1.867	3.154	2.903	1.698			
(3)** Bis(2- Ethylhexyl)phthalate					0.014								
**Butyl benzyl phthalate					0.010								

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* The effluent non-detects on [dates] represent our laboratory's lowest achievable MQLs
*No MAHC's calculated for these parameters

(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 TBL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table VI] detected and the concentration at which they were detected.
**reported data is only one of three grabs that day. All others were non-detect.

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration (from inf-eff charts MAHC column by Larry Weir, Egr.)

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

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	2	yes	n/a	C	C	C
B & W Plating	1721	Categorical	Y	11/17/09	no	1	0*	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
Simmons Foods	2015	Noncategorical	Y	4/16/11	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	C
Tate & Lyle	2046	Noncategorical	Y	6/1/10	no	1	11	yes	n/a	n/a	C	NC
Tyson Foods	2017	Noncategorical	Y	12/1/09	no	1	6	yes	n/a	n/a	C	NC
Arkansas Valley Truck Wash of America	7542	Noncategorical	Y	1/1/09	no	1	4	yes	n/a	n/a	C	NC

*Seet up composite sampler several times but no flow and no sample collected

SIGNIFICANT VIOLATORS -- ENFORCEMENT ACTIONS TAKEN
ATTACHMENT B

INDUSTRIAL USER	NATURE OF VIOLATION	NUMBER OF ACTIONS TAKEN					COMPLIANCE SCHEDULE			PENALTIES DATE ISSUED	DATE DUE	CURRENT STATUS	COMMENTS	
		REPORTS	LIMITS	N.O.V.	A.O.	CIVIL	CRIMINAL	OTHER	COLLECTED					
Tate & Lyle		6X	3	0	0	0	0	0	0	yes	n/a	n/a	C	BOD, -TSS excursions
Simmons Foods		9X	5	0	0	0	0	0	0	yes	n/a	n/a	C	BOD excursion
Simmons Poultry Farms		21X	9	0	0	0	0	0	0	yes	n/a	n/a	C	BOD excursions
B & W Plating		1X	1	0	0	0	0	0	0	n/a*	n/a	n/a	C	One isolated lead excursion

* Due to extremely low discharged amount (batch) no penalty collected. Next batch tested well within limits

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, 2010 September 30, 2011
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 4

Total Number of Significant Noncategorical IUs 5

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS

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

Compliance Monitoring Program

1) No. of Control Documents Issued/Total No. Required.....	4/4	5/5
2) No. of Nonsampling Inspections Conducted.....	4/4	5/5
3) No. of Sampling Visits Conducted.....	6	37

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>1</u>	<u>18</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>\$18,754.00/5</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 *Hammond* Date 10-24-11

* Refer to section 10.08.07 paragraph # 2 [Ordinance # 26-2009]

PPS Program Report

* NPDES ID: AR00040967

Permittee's Name Van Buren

* Report Received/Event Date: 10/26/2011

Date 10-31-2011

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: 10/01/2010

Significant Industrial Users (SIUs)

SIUs: 9

SIUs Without Control Mechanism: 0

SIUs Not Inspected: 0

SIUs Not Sampled: 0

SIUs in SNC with Pretreatment Standards: 0

SIUs in SNC with Reporting Requirements: 0

SIUs in SNC with Pretreatment Schedule: 0

SIUs in SNC Published in Newspaper: 0

SIUs Schedules: 0

Violation Notices Issued to SIUs: 19

Administrative Orders Issued to SIUs: 0

Civil Suits Filed Against SIUs: 0

Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

CIUs: 4

CIUs in SNC: 0

Penalties

Dollar Amount of Penalties Collected: \$ 18,754

Number of Industrial Users (IUs) from which Penalties have been collected: 5

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Adoption of IU Schedule for Remedial Measures: No

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: 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:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling: