

Commission:  
Jim Williamson  
Todd Young  
Chad Adams  
Keith Hefner



Attorney  
Sean Brister  
Secretary  
Kathy Geppert

2806 Bryan Road / P.O. Drawer 1269  
Van Buren, Arkansas 72957  
479-474-5067 / Fax 479-471-8969  
Van Buren Municipal Utilities

October 14, 2022  
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 ~~2020-2021~~ 2021-2022

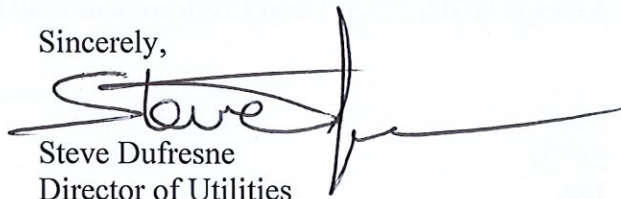
Dear Pretreatment Coordinator :

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

- I. Cover Page
- II. Annual Averages for Main, North and Bekaert Plants
- III. Influent-Effluent Chart for Main Plant – Table III
- IV. Influent-Effluent Chart for North Plant – Table III
- V. Attachment A -- PPS Report Updated SIU List
- VI. Attachment B -- Significant Violations – Enforcement Action
- VII. Attachment C – PPS (1<sup>st</sup> page)
- VIII. Attachment C – PPS (2<sup>nd</sup> page)

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

Sincerely,



Steve Dufresne  
Director of Utilities

Cc: ADEQ  
Nathan Gregory, VBMU Pretreatment Coordinator  
North & South Plant files





(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 (not required but, **SHOULD also be met for the influent**) so the data can also be used for future Local Limits re-evaluation/assessments and NPDES application purposes.

(2) The value MAHC (= MAHL / 8.34 X Avg. POTW flow in MGD) was calculated during the development of TBLL based on State WQ criteria, EPA guidance and ADEQ Pretreatment staff Excel spreadsheets.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity at which they were detected.

MAHC - Maximum Allowable Headworks Concentration

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

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: Oct. 1, 2022 TO Sept. 1, 2022**  
**TREATMENT PLANT: City of Van Buren NPDES PERMIT #AKR0040967**  
**AVERAGE POTW FLOW: 1.508 MGD % IU FLOW: 0.95%**

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		
	Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (ug/l) (1)	EPA Method Used (1)	Detection Level Achieved (ug/l)
	12/8 2021	1/15 2022	6/14 2022	8/22 2022		12/8 2021	1/15 2022	6/14 2022	8/22 2022			
Antimony	0	0	0	0	N/A	0	0	0	0	60	200.8	60
Cadmium	0	0	0	0	1.84	0	0	0	0	0.5	200.8	0.5
Copper	16	6.1	19	67	9.24	3.5	4.6	5.1	0	0.5	200.8	0.5
Lead	.84	.55	.67	0.16	2.71	0	0	0	0	0.5	200.8	0.5
Mercury	0.13	0.01	0.16	2.8	.0134	0.0072	0	0	0	.005	EPA245.7	.0018
Nickel	167.18	3.6	3.8	2.8	96.96	2.6	3.2	3.3	0	0.5	200.8	0.5
Selenium	11.16	0	0	0	5.58	0	0	0	0	5	200.8	5
Silver	3.73	0	0	0	.93	0	0	0	0	0.5	200.8	0.5
Zinc	167.71	150	66	70	85.53	44	0	31	0	20	200.8	20
Chromium	748.99	0	0	0	295.4(TRI)	0	0	0	0	10	200.8	10
Cyanide	187.2	0	0	0	5.80	0	0	0	0	10	SM4500-CN C.E	10
Chromium Hexavalent	0	0	0	0	11.81(HEX)	N/A	N/A	N/A	N/A	10	SM3500-CrB	.00001
Arsenic	341.2	29	13	69	348.96	2.6	4.5	5.4	0	0.5	200.8	0.5
Molybdenum	+	0	0	0		0	0	0	0	0.5	200.8	0.5
Phenols	N/A	0.13	.14	.098		0.10	.015	0	0	5	EPA420.1	0.000005
Beryllium	11.83	0	0	0	5.91	0	0	0	0	0.5	200.8	0.5
Thallium	N/A	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	4.480	5.790	3.643	N/A	3.638	2.98	2.883	1.7			

- (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 (not required but, SHOULD also be met for the influent) so the data can also be used for future Local Limits re-evaluation/assessments and NPDES application purposes.**
- (2) The value MAHC (= MAHL / 8.34 X Avg. POTW flow in MGD) was calculated during the development of TBLI based on State WQ criteria, EPA guidance and ADEQ Pretreatment staff Excel spreadsheets.
- (3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity at which they were detected.

MAHC - Maximum Allowable Headworks Concentration

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SIGNIFICANT VIOLATORS -- ENFORCEMENT ACTIONS TAKEN  
ATTACHMENT B

INDUSTRIAL USER	Nature of Violation		NUMBER OF ACTIONS TAKEN						COMPLIANCE SCHEDULE			
	REPORTS	LIMITS	N.O.V.	A.O.	CIVIL	CRIMINAL	OTHER	PENALTIES COLLECTED	DATE ISSUED	DATE DUE	CURRENT STATUS	COMMENTS
Simmons Prepared Foods Main Street		X	9	0	0	0	0	yes	n/a	n/a	C	10X-BOD5
Simmons Prepared Foods Cook Plant		X	9	0	0	0	0	yes	n/a	n/a	NC	14X-BOD5
Tate & Lyle		X	3	0	0	0	0	yes	n/a	n/a	C	1X-BOD5
Arkansas Valley Truck Wash		X	3	0	0	0	0	yes	n/a	n/a	C	1X-BOD5 2X - TSS
Inter-American Proppants			0	0	0	0	0	no	n/a	n/a	C	
River City Coatings			0	0	0	0	0	no	n/a	n/a	C	
Fab Tech			0	0	0	0	0	no	n/a	n/a	C	
Arkansas Lamp			0	0	0	0	0	no	n/a	n/a	C	
Tyson			0	0	0	0	0	no	n/a	n/a	C	



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 City of Van Buren Municipal Utilities

Address 2806 Bryan Road, P.O. Drawer 1269

City Van Buren State/Zip Arkansas 72956

Contact Person Steve Dufresne Director  
(Position)

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

NPDES Permit Nos. AR0021482 & AR0040967

Reporting Period October 1, 2021 September 30, 2022  
(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>0/0</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>0/0</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>0/10</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>1/3</u>	<u>0/6</u>
3) No. of Sampling Visits Conducted.....	<u>4/3</u>	<u>32/6</u>

4)	No. of Facilities Inspected (nonsampling).....	<u>1/3</u>	<u>0/6</u>
5)	No. of Facilities Sampled.....	<u>3/3</u>	<u>6/6</u>

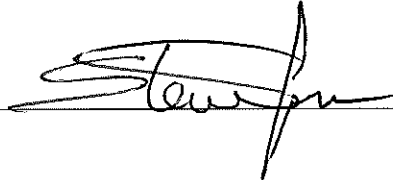
Enforcement Actions

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>3/3</u> <u>21 /6</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>\$51157.96</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 10/21/2022

t: 501.682.0858 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



## ARKANSAS ENERGY & ENVIRONMENT

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**From:** Steve Dufresne [<mailto:steve@vbmunicipal.org>]  
**Sent:** Friday, **October 21,** 2022 2:55 PM  
**To:** Pretreatment-Submittals  
**Cc:** Nathan Gregory; James Dunn; Darel Manus; South WWTP; North WWTP  
**Subject:** City of Van Buren Municipal Utilities Pretreatment Report 2021-2022

Arkansas Energy & Environment Environmental Quality  
Pretreatment Program  
5301 Northshore Drive  
North Little Rock, Arkansas 72218

Via email

Re: Annual Pretreatment Report 2021-2022  
NPDES Permit No.(s): AR0021482, AR0040967, AR0037567

Please find the attached report for the City of Van Buren South, North, and Lee Creek Industrial Park WWTPs.  
Please let us know if you need further information.

Sincerely,

**Steve Dufresne**  
**Director of Utilities**  
**City of Van Buren Municipal Utilities**  
**(479)474-5067**

[vbmunicipal.org](http://vbmunicipal.org)  
 **MUNICIPAL  
UTILITIES**

I apologize for these oversights and assure you that our team will coordinate and implement scheduling and control procedures to prevent similar oversights in the future. Please let me know if you need further information or if additional action is required.

Sincerely,

Steve Dufresne  
Director of Utilities  
City of Van Buren Municipal Utilities  
(479)474-5067  
[vbmunicipal.org](http://vbmunicipal.org)



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From: Jamie Belcourt (adpce.ad) <[jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)>  
Sent: Monday, October 31, 2022 1:58 PM  
To: Steve Dufresne <[steve@vbmunicipal.org](mailto:steve@vbmunicipal.org)>  
Cc: Nathan Gregory <[nathan@vbmunicipal.org](mailto:nathan@vbmunicipal.org)>; James Dunn <[james@vbmunicipal.org](mailto:james@vbmunicipal.org)>; Darel Manus <[darel@vbmunicipal.org](mailto:darel@vbmunicipal.org)>; South WWTP <[vbsouthwwtp@vbmunicipal.org](mailto:vbsouthwwtp@vbmunicipal.org)>; North WWTP <[vnorthwwtp@vbmunicipal.org](mailto:vnorthwwtp@vbmunicipal.org)>; Richard Healey (adpce.ad) <[Richard.Healey@adeq.state.ar.us](mailto:Richard.Healey@adeq.state.ar.us)>; Stacie Wassell (adpce.ad) <[wassell@adeq.state.ar.us](mailto:wassell@adeq.state.ar.us)>  
Subject: RE: City of Van Buren Municipal Utilities Pretreatment Report 2021-2022

Good afternoon,

I am inquiring about the City of Van Buren's (NPDES Permits: AR0021482, AR0037567, AR0040967) October 1, 2021 – September 30, 2022 Annual Pretreatment Program Report.

In regards to NPDES Permit AR0040967, the monitoring results indicate that sampling was not conducted during the second quarter (January 15, 2022). In the report, both influent and effluent results are not noted on the report. Was this a reporting error, or was sampling not conducted? Please provide an explanation.

Additionally, Attachment A of the Pretreatment Program Status Report indicates that only one (1) inspection was conducted at one (1) facility, Arkansas Valley Truck Wash of America. The report indicates that the remaining eight (8) facilities were not inspected during the reporting year. However, the attachment does indicate that all nine (9) facilities were sampled at least once. Please provide an explanation.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator  
Division of Environmental Quality | Office of Water Quality  
Policy and Administration  
5301 Northshore Drive | North Little Rock, AR 72118



## ARKANSAS ENERGY & ENVIRONMENT

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**From:** Steve Dufresne [<mailto:steve@vbmu.org>]  
**Sent:** Wednesday, November 2, 2022 1:34 PM  
**To:** Jamie Belcourt (adpce.ad)  
**Cc:** Nathan Gregory; James Dunn; Darel Manus; South WWTP; North WWTP; Richard Healey (adpce.ad); Stacie Wassell (adpce.ad)  
**Subject:** RE: City of Van Buren Municipal Utilities Pretreatment Report 2021-2022

Good afternoon,

In regards to NPDES Permit AR0040967, the monitoring results indicate that sampling was not conducted during the second quarter (January 15, 2022). In the report, both influent and effluent results are not noted on the report. Was this a reporting error, or was sampling not conducted? Please provide an explanation.

Sampling was inadvertently not conducted for the second quarter period of January 2022 – March of 2022 due to an oversight by the North Plant WWTP Operator and the Pretreatment Coordinator. The previous VBMU Pretreatment Coordinator (hired February 1, 1992 -retired April 30, 2022) was on FMLA leave and working part time during that period. We, the Chief Plant Operator and I, did not realize sampling had not been conducted until we began collecting information for the Pretreatment Report. The new VBMU Pretreatment Coordinator and Chief Plant Operator will coordinate with me to schedule sample collection for all 4 quarters from now on.

Additionally, Attachment A of the Pretreatment Program Status Report indicates that only one (1) inspection was conducted at one (1) facility, Arkansas Valley Truck Wash of America. The report indicates that the remaining eight (8) facilities were not inspected during the reporting year. However, the attachment does indicate that all nine (9) facilities were sampled at least once. Please provide an explanation.

Though a basic walk through was performed, formal Inspections were inadvertently not conducted for all facilities during the October 2021 to September 2022 reporting period due to an oversight by the Pretreatment Coordinator. As stated above; the previous VBMU Pretreatment Coordinator (hired February 1, 1992 - retired April 30, 2022) was on FMLA leave and working part time during the period of January 2022 – April 2022. Nathan Gregory began performing the duties of VBMU Pretreatment Coordinator in June of 2022, during that time and since that time VBMU has been short handed due to one WWTP being off on Workers Comp Leave and multiple other occurrences. We, the Chief Plant Operator and I, did not realize formal inspections had not been conducted until we began collecting information for the Pretreatment Report. The new VBMU Pretreatment Coordinator and Chief Plant Operator will coordinate with me to schedule formal inspections from now on. We are currently scheduled to begin this week.

**From:** Jamie Belcourt (adpce.ad)  
**Sent:** Wednesday, November 9, 2022 9:43 AM  
**To:** Steve Dufresne  
**Subject:** City of Van Buren's (NPDES Permits: AR0021482, AR0037567, AR0040967) October 1, 2021 – September 30, 2022 Annual Pretreatment Program Report

Good morning,

I have a further inquiry about the City of Van Buren's (NPDES Permits: AR0021482, AR0037567, AR0040967) October 1, 2021 – September 30, 2022 Annual Pretreatment Program Report. Specifically, please submit the items below for review.

- NPDES Permit AR0021482 - Influent and effluent sampling analytical data and chain-of-custody documentation for the dates below:
  - 10/25/2021,
  - 2/14/2022,
  - 4/27/2022,
  - 7/12/2022, and
  - 7/13/2022
- NPDES Permit AR0040967 - Influent and effluent sampling analytical data and chain-of-custody documentation for the dates below:
  - 12/8/2021,
  - 6/14/2022, and
  - 8/22/2022
- Copies of NOV's sent to the following facilities during the October 1, 2021 – September 30, 2022 Pretreatment Reporting Year:
  - Simmons Prepared Foods – Main Street,
  - Simmons Prepared Foods – Cook Plant,
  - Tate & Lyle, and
  - Arkansas Valley Truck Wash
- Documentation of required corrective actions the City of Van Buren has requested from Simmons Prepared Foods – Main Street, Simmons Prepared Foods – Cook Plant, Tate & Lyle, and Arkansas Valley Truck Wash

If you have any questions, please do not hesitate to reach out.

Regards,

**Jamie Belcourt** | State Pretreatment Coordinator  
**Division of Environmental Quality | Office of Water Quality  
Policy and Administration**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0858 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



**From:** [Steve Dufresne](#)  
**To:** [Jamie Belcourt \(adpce.ad\)](#)  
**Cc:** [Nathan Gregory](#); [James Dunn](#); [Darel Manus](#); [South WWTP](#); [North WWTP](#); [Richard Healey \(adpce.ad\)](#); [Stacie Wassell \(adpce.ad\)](#)  
**Subject:** RE: City of Van Buren's (NPDES Permits: AR0021482, AR0037567, AR0040967) October 1, 2021 – September 30, 2022 Annual Pretreatment Program Report  
**Date:** Thursday, November 10, 2022 1:27:49 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[PTR A.pdf](#)  
[PTR B.pdf](#)  
[PTR C.pdf](#)

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Please find the attached information as requested. I would note that there were not any formal Corrective Action Plans requested, there were however, requests in the NOV's to "Please respond to this allegation in writing explaining why this violation occurred..." At this time, we have not been able to locate responses for some of the NOV's, (as noted on the attached NOV's). It appears that some of the responses may have been sent to an email address that is no longer accessible or may have been misplaced, or not submitted, we are continuing review.

Also, we are in review of the City of Van Buren Municipal Utilities Pretreatment Program and Ordinance, it appears that pursuant to the program, some of the NOV's should have been a Notice of Exceedance, and not necessarily a Notice of Violation. I would also note that none of the exceedances have caused any treatment issues at the City WWTP.

We are currently working with our consulting engineer to begin an update and streamline of the current program/ordinance, TBLL's and MAHL's as the most recently adopted are from 2011.

Please let me know if you need further information or if further action is required.

**Steve Dufresne**  
**Director of Utilities**  
**City of Van Buren Municipal Utilities**  
**(479)474-5067**  
[vbmunicipal.org](#)

**VBM MUNICIPAL UTILITIES**  
**"ONE WATER - ONE TEAM - ONE VBMU"**

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**From:** Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>  
**Sent:** Wednesday, November 9, 2022 9:43 AM  
**To:** Steve Dufresne <steve@vbmunicipal.org>  
**Subject:** City of Van Buren's (NPDES Permits: AR0021482, AR0037567, AR0040967) October 1, 2021 – September 30, 2022 Annual Pretreatment Program Report

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Regards,

**Jamie Belcourt** | State Pretreatment Coordinator  
**Division of Environmental Quality | Office of Water Quality**  
**Policy and Administration**

5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0858 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



**ARKANSAS**  
**ENERGY & ENVIRONMENT**

---

**From:** Steve Dufresne [<mailto:steve@vbm.org>]

**Sent:** Wednesday, November 2, 2022 1:34 PM

**To:** Jamie Belcourt (adpce.ad)

**Cc:** Nathan Gregory; James Dunn; Darel Manus; South WWTP; North WWTP; Richard Healey (adpce.ad); Stacie Wassell (adpce.ad)

**Joshua Hickey (adpce.ad)**

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**From:** Steve Dufresne <steve@vbmu.org>  
**Sent:** Thursday, November 10, 2022 1:28 PM  
**To:** Jamie Belcourt (adpce.ad)  
**Cc:** Nathan Gregory; James Dunn; Darel Manus; South WWTP; North WWTP; Richard Healey (adpce.ad); Stacie Wassell (adpce.ad)  
**Subject:** RE: City of Van Buren's (NPDES Permits: AR0021482, AR0037567, AR0040967) October 1, 2021 – September 30, 2022 Annual Pretreatment Program Report  
**Attachments:** PTR A.pdf; PTR B.pdf; PTR C.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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City of Van Buren Municipal Utilities  
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"ONE WATER - ONE TEAM - ONE VBMU"