

Peltier, Hannah

From: Gilliam, Allen
Sent: Tuesday, October 28, 2014 11:38 AM
To: steve@vbm.arcoxml.com; 'van buren kim redo'
Cc: Fuller, Kim; Peltier, Hannah; Ramsey, David; Kaelin, Cynthia
Subject: AR0021482_Van Buren Oct 2014 non compliant annual Pretreatment report with ADEQ reply_20141028
Attachments: Van Buren Oct 2014 Annual Pretreatment Report.PDF

Steve,

Van Buren's October 2014 annual Pretreatment report was received on October 23rd, reviewed, but deemed not complete nor compliant with the reporting requirements in 40 CFR 403.12(i) referring to the below notes.

On the 1st page of Attachment C, under Part II "Significant Industrial User Compliance", the SIGNIFICANT INDUSTRIAL USERS" column for "BMRs/Total No. Required" should reflect BMRs submitted by newly connected (within your last Pretreatment year) categorical industries. Line 1), 1st column in that section should be "0/0" (unless you had 4 new categorical industry connect/begin discharging to Van Buren's collection system within your last Pretreatment year).

On the 2nd page of the same attachment under "Enforcement Actions", 7) asks for "Amount of Penalties Collected (total dollars/IUs Assessed)(Not Surcharged)". You have entered \$25,782 in "penalties, but haven't indicated how many IUs this penalty amount was assessed against. Please advise this office within five (5) from the date on this correspondence the number of IUs this penalty amount was assessed.

Attachment B "Significant Violators" is reserved for those significant industries in significant non-compliance [SNC per 40 CFR 403.8(f)(2)(viii)]. Please take note for future annual reports as you've reported "0" on Attachment C, Part II, #6). Specific violations per IU should continue to be listed if you wish to footnote them on Attachment A.

If you have any questions or comments please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

A1VT5
AG

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

VB MUNICIPAL UTILITIES

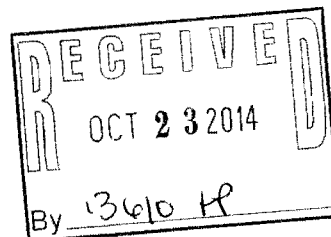
Attorney
Paul Gant

Secretary
Kathy Geppert

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

October 21, 2014

Mr. Allen Gilliam
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 2013-2014

Dear Mr. Gilliam:

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

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

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

Sincerely,


Steve Dufresne
Director of Utilities

Cc: ADEQ
Kim Redo, VBMU Environmental Coordinator
file

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: Oct. 1, 2013 TO Sept. 30, 2014
TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0021482
AVERAGE POTW FLOW: 2.188 MGD % IU FLOW: 36.7 %

METALS, CYANIDE and PHENOLS (Total)	MAHC (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/quarter				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/quarter				LABORATORY ANALYSIS		
		10/1/2013	2/24/2014	5/5/2014	7/7/2014		10/1/2013	2/24/2014	5/5/2014	7/7/2014	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8	60
Cadmium	54.1	0	0	0	0	126.52	480	0	0	0	0.5	200.8	0.5
Copper	1000.0	13	10	10	14	431.63	9.6	6.1	6.7	0.59	0.5	200.8	0.5
Lead	587.2	1.1	0.90	1.1	1.1	587.66	1.0	0.69	0.59	0	0.5	200.8	0.5
Mercury	0.98ug/ L	0.25	0.14	0.11	0.017	0.39 ug/L	0.0047	0.0049	0.42	0	.005	EPA 245.7	1.8 ng/L
Nickel	426.42	4.2	7.6	4.0	7.5	15071.86	3.9	5.9	4.5	6.6	0.5	200.8	0.5
Selenium	85.28	0	0	0	0	137.76	0	0	0	0	5	200.8	5
Silver	250.00	2.4	2.1	0	0	112.58	0	0	0	0	0.5	200.8	0.5
Zinc	300.00	71	71	78	93	3461.17	40	64	36	33	20	200.8	20
Chromium, total	1000.0	0	0	0	0	22680.2	0	0	0	0	10	200.8	10
Cyanide	100.00	0	0	0	0	154.01	0	0	0	0	10	SM4500- CN C,E	0.01 mg/L
Arsenic	71.07	1.4	0.69	0.64	1.1	4807.76	1.4	0.58	0	1.2	0.5	200.8	0.5
Molybdenum	63.96	0	0	0	0	N/A	0	0	0	0	--	200.8	0.5
Phenols	N/A	82	58	44	110	N/A	24	9.7	0	7.3	5	EPA 420.1	0.005 mg/L
Beryllium	100.00	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	1.700	1.814	1.900	1.651	N/A	1.784	1.834	2.428	1.430			
Chromium, Hexavalent					0					0	10	SM-Cr B	10
Bis(2-ethylhexyl) Phthalate										26			
Phenol										17			

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: Oct. 1, 2013 TO Sept. 30, 2014
TREATMENT PLANT: City of Van Buren NPDES PERMIT #AR0040967
AVERAGE POTW FLOW: 1.130 MGD % IU FLOW: 0.87%

METALS, CYANIDE and PHENOLS (Total)	MAHC (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/year				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/year				LABORATORY ANALYSIS		
		11/17/13	3/12/14	4/22/14	7/29/14		11/17/2013	3/12/14	4/22/14	7/29/14	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8	60
Cadmium	5.58	0	1.2	0	0	1.84	0	0	0	0	0.5	200.8	0.5
Copper	31.85	5.8	0	19	18	9.24	6.7	7.7	6.6	5.6	0.5	200.8	0.5
Lead	10.84	0	2.0	0.76	0.95	2.71	0.52	1.3	0	0.57	0.5	200.8	0.5
Mercury	0.03	0	0.037	0.014	0.0083	0.0134	0	0	0	0	.005	EPA 245.7	0.0018
Nickel	167.18	5.0	5.7	4.6	3.9	96.96	3.0	2.8	3.1	3.8	0.5	200.8	0.5
Selenium	11.16	0	0	0	0	5.58	0	0	0	0	5	200.8	5
Silver	3.73	0	0.59	0	0	0.93	0	0	0	0	0.5	200.8	0.5
Zinc	167.71	34	130	87	100	85.53	67	110	70	110	20	200.8	20
Chromium, total	748.99	0	0	0	0	11.81(hex) 295.4(tri)	0	0	0	0	10	200.8	10
Chromium, Hexavalent		0	0	0	0		0	0	0	0	10	SM 3500- Cr B	10
Cyanide	187.2	0	0.17	0	0	5.80	0	0	0	0	10	SM4500- CN C,E	0.00001
Arsenic	341.2	0.67	1.3	0.83	1.2	348.96	0	0.54	0	0.81	0.5	200.8	0.5
Phenols	*	0.075	0.057	0.048	33		0.025	0	19	19	5	EPA 420.1	0.000005
Beryllium	11.83	0	0	0	0	5.91	0	0	0	0	0.5	200.8	0.5
Thallium	*		0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	0.657	1.703	0.911	0.826	N/A	0.657	1.703	0.911	0.826			
Bis(2-ethylhexyl) Phthalate					14						10	EPA 625	10
											10	EPA 625	10

*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 TBLL 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 V] detected and the concentration at which they were detected.

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration

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

PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT USERS LIST
 ATTACHMENT A

INDUSTRIAL USER	SIC CODE	Categorical Determination	Control Document Y/N	Last Action	New User	Times Inspected	Times Sampled	BMR	COMPLIANCE STATUS REPORTS			
									90-DAY COMPLIANCE	SEMI ANNUAL	SELF MONITORING	EFFLUENT LIMITS
Arkansas Lamp Mfg.	1721	Categorical	Y	10/01/2011	no	1	1*	yes	n/a	C	C	C
B & W Plating	1721	Categorical	Y	11/17/2012	no	1	0*	yes	n/a	C	C	C
FabTech	3400	Categorical	Y	3/1/2013	no	1	2	yes	n/a	C	C	C
Oxane Materials	212325	Noncategorical	Y	1/1/2013	no	1	8	yes	n/a	n/a	NC	NC
River City Coatings	1721	Categorical	Y	9/19/2013	no	1	2	yes	n/a	C	C	C
Simmons Foods	2015	Noncategorical	Y	4/16/2014	no	1	6	yes	n/a	n/a	C	NC
Simmons Poultry Farms	2017	Noncategorical	Y	12/01/2011	no	1	10	yes	n/a	n/a	C	NC
Tate & Lyle	2046	Noncategorical	Y	6/1/2013	no	1	12	yes	n/a	n/a	C	NC
Tyson Foods	2017	Noncategorical	Y	12/1/2012	no	1	6	yes	n/a	n/a	C	C
Arkansas Valley Truck Wash of America	7542	Noncategorical	Y	1/1/2012	no	1	4	yes	n/a	n/a	C	NC

*Arkansas Lamp - only 1 sampling event due to no other discharges for the year

*B & W Plating - no discharge all year

SIGNIFICANT VIOLATORS -- ENFORCEMENT ACTIONS TAKEN
ATTACHMENT B

INDUSTRIAL USER	VIOLATION OF		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
Oxane Materials	X	X	1	0	0	0	0	yes	n/a	n/a	C	unauthorized discharge
Tate & Lyle		X	5	0	0	0	0	yes	n/a	n/a	C	BOD ₅ , -TSS excursions
Simmons Foods		X	5	0	0	0	0	yes	n/a	n/a	C	BOD ₅ excursion
Simmons Prepared Foods		X	3	0	0	0	0	yes	n/a	n/a	C	BOD ₅ excursions
Arkansas Valley Truck Wash		X	2	0	0	0	0	yes	n/a	n/a	C	TSS & Zn excursions

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 Steve Dufresne Director of Utilities

(Position)

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

NPDES Permit Nos. AR0021482 & AR0040967

Reporting Period October 1, 2013 September 30, 2014
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 4

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>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>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>0/4</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>4/4</u>	<u>6/6</u>
2) No. of Nonsampling Inspections Conducted.....	<u>4/4</u>	<u>6/6</u>
3) No. of Sampling Visits Conducted.....	<u>8/4</u>	<u>44/6</u>

4)	No. of Facilities Inspected (nonsampling).....	<u>4/4</u>	<u>6/6</u>
5)	No. of Facilities Sampled.....	<u>4</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>17/6</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>1</u>
7)	Amount of Penalties Collected (total dollars/ IUs Assessed) (Not Surcharges).....	<u>\$0</u>	<u>\$25,782</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 Steve Dufresne Date 10-21-2014

STEVE DUFRESNE
DIRECTOR OF UTILITIES