

ADEQ

ARKANSAS
Department of Environmental Quality

June 9, 2011

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

Re: City of Van Buren TBLL/MAHL Development
(Permit No. AR0021482, AFIN 17-00062)

Dear Mr. Smith:

In reply to Recommended Change shown in paragraph 3 in the Department's letter dated June 18, 2010, Van Buren Municipal Utilities (VBMU) submitted separate TBLL/MAHL charts attached to the City's letter dated April 22, 2011. The Department has reviewed the charts and the charts are accurate but incomplete. Based on the City's approved pretreatment program (March 6, 1997), the City must include conventional pollutants (BOD5 and TSS) in the TBLL/MAHL evaluation charts.

In addition, the current NPDES permits have limits for additional conventional pollutants. The City should consider developing MAHLs for other pollutants as shown below:

<u>WWTP (Permit No.)</u>	<u>Conventional Pollutant of Concern</u>
South-Main (AR0021482):	CBOD5, BOD5, TSS, NH3-N & TP
North (AR0040967):	CBOD5, TSS & NH3-N
Lee Creek (AR0037567):	BOD5 & TSS

The City must submit the amended TBLL charts (Excel spreadsheets) for the Main and South WWTPs and the new TBLL chart for the Lee Creek WWTP by June 30, 2011. The City must submit the associated methodology for developing the limits so the Department can follow the rationale for the MAHLs.

In the future, the City must continue to track the actual headworks loading for all pollutants of concern (metals, cyanide and conventional). The October 2011 annual report (Influent-Effluent Charts) must be updated to include all calculated MAHLs.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us.

Sincerely,



Rufus Torrence,
ADEQ Engineer

Cc: Larry Weir, PE / 1714 Bunker Hill Drive / Van Buren, Arkansas 72956-2826