

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

# VBMUNICIPAL 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 31, 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  
REVISED Per October 28, 2014 email

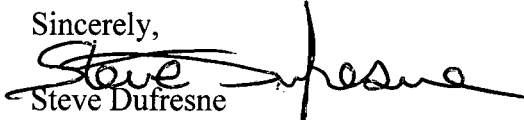
Dear Mr. Gilliam:

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 (1<sup>st</sup> page)
- IX. 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  
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<br>and PHENOLS<br>(Total) | MAHC<br>(µg/l)<br>(2) | INFLUENT DATES SAMPLED<br>(µg/l)<br>Once/quarter |           |          |          | WQ<br>level/<br>limit<br>(µg/l)<br>(2) | EFFLUENT DATES SAMPLED<br>(µg/l)<br>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<br>MQL<br>(µg/l)<br>(1) | EPA<br>Method<br>Used<br>(1) | Detection<br>Level<br>Achieved<br>(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/<br>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-<br>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)<br>Phthalate            |                       |  |           |          |          |  |  |           |          | 26       |                             |                              |  |
| Phenol                                    |                       |  |           |          |          |  |  |           |          | 17       |                             |                              |  |

\*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 (from inf-eff charts MAHC column by Larry Weir, Egr.)

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

**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,<br>CYANIDE and<br>PHENOLS<br>(Total) | MAHC<br>(µg/l)<br>(2) | INFLUENT DATES SAMPLED<br>(µg/l)<br>Once/year |         |         |         | WQ<br>level/<br>limit<br>(µg/l)<br>(2) | EFFLUENT DATES SAMPLED<br>(µg/l)<br>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<br>MQL<br>(µg/l)<br>(1) | EPA<br>Method<br>Used<br>(1) | Detection<br>Level<br>Achieved<br>(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)<br>295.4(tri)               | 0   | 0       | 0       | 0       | 10                          | 200.8                        | 10                                       |
| Chromium,<br>Hexavalent                      |                       | 0   | 0       | 0       | 0       |  | 0   | 0       | 0       | 0       | 10                          | SM 3500-<br>Cr B             | 10                                       |
| Cyanide                                      | 187.2                 | 0   | 0.17    | 0       | 0       | 5.80                                   | 0   | 0       | 0       | 0       | 10                          | SM4500-<br>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)<br>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.



SIGNIFICANT VIOLATORS -- ENFORCEMENT ACTIONS TAKEN  
ATTACHMENT B

| INDUSTRIAL<br>USER | VIOLATION<br>OF<br>REPORTS LIMITS | NUMBER OF ACTIONS TAKEN |      |       |          |       | COMPLIANCE SCHEDULE    |                |             |                   |          |
|--------------------|-----------------------------------|-------------------------|------|-------|----------|-------|------------------------|----------------|-------------|-------------------|----------|
|                    |                                   | N.O.V.                  | A.O. | CIVIL | CRIMINAL | OTHER | PENALTIES<br>COLLECTED | DATE<br>ISSUED | DATE<br>DUE | CURRENT<br>STATUS | COMMENTS |

No SNC violators  
2013-2014

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  
(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<br>No. Required.....                                  | <u>0/0</u>         | <u>N/A*</u>           |
| 2) No. of SIUs submitting 90-day Compliance<br>Reports/No. Required.....                   | <u>0/0</u>         | <u>N/A*</u>           |
| 3) No. of SIUs submitting Semi-annual Reports/<br>Total No. Required.....                  | <u>0/0</u>         | <u>0/0</u>            |
| 4) No. of SIUs meeting Compliance Schedule/<br>Total No. Required to Meet Schedule.....    | <u>0/0</u>         | <u>0/0</u>            |
| 5) No. of SIUs in Significant Noncompliance/<br>Total No. of SIUs.....                     | <u>0/4</u>         | <u>0/6</u>            |
| 6) Rate of Significant Noncompliance for all<br>SIUs (categorical and noncategorical)..... |                    | <u>0/10</u>           |

Compliance Monitoring Program

|   |            |             |
|---|------------|-------------|
| 1) No. of Control Documents Issued/Total No.<br>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>0/0</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>0</u>              |
| 7) | Amount of Penalties Collected (total dollars/ IUs Assessed) (Not Surcharges)..... | <u>\$0</u>         | <u>\$25,782/5</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 Steve James Date 10-31-2014

**steve@vbm.arcoxml.com**

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**From:** "Gilliam, Allen" <GILLIAM@adeq.state.ar.us>  
**Date:** Tuesday, October 28, 2014 11:38 AM  
**To:** <steve@vbm.arcoxml.com>; "van buren kim redo" <kim@vbm.arcoxml.com>  
**Cc:** "Fuller, Kim" <FULLER@adeq.state.ar.us>; "Peltier, Hannah" <peltier@adeq.state.ar.us>; "Ramsey, David" <RAMSEY@adeq.state.ar.us>; "Kaelin, Cynthia" <KAELIN@adeq.state.ar.us>  
**Attach:** Van Buren Oct 2014 Annual Pretreatment Report.PDF  
**Subject:** AR0021482\_Van Buren Oct 2014 non compliant annual Pretreatment report with ADEQ reply\_20141028

Steve,

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

On the 1<sup>st</sup> 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), 1<sup>st</sup> 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 2<sup>nd</sup> 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.

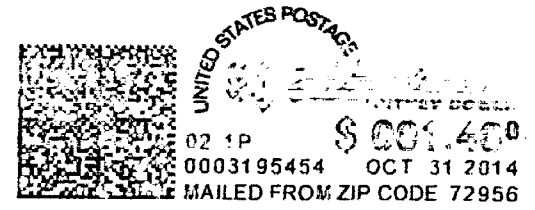
Attachment B "Significant Violators" is reserved for those significant industries in significant non-compliance [SNC per 40 CFR 403.8(f)(2)(viii)]. Please take note for future annual reports as you've reported "0" on Attachment C, Part II, #6). Specific violations per IU should continue to be listed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

10/31/2014



**VB MUNICIPAL UTILITIES**

2806 Bryan Rd. • Van Buren, AR 72956

Mr. Allen Gilliam  
Pretreatment Coordinator NPDES Branch  
Arkansas Dept. of Environmental Quality  
5301 North Shore Drive  
North Little Rock, Arkansas 72218

