

**Torrence, Rufus**

**From:** Torrence, Rufus  
**Sent:** Monday, April 13, 2009 8:25 AM  
**To:** Daniel Dawson (d.dawson@cablelynx.com)  
**Subject:** AFIN 73-00055 AR0021601 City of Searcy Pretreatment Program 2008 Annual Report

Dan,

I have reviewed your 2008 report. First, allow me to apologize for the confusion that occurred in the transition of your program to my oversight. Second, allow me to congratulate you on completing your inf/eff chart precisely according to department guidance (This is the first chart that I have reviewed which had no mistakes). However, I still have some concerns:

1. Even though you are not required to use the forms supplied by ADEQ, please consider using these forms. They help you submit a complete/accurate report and they aide in my review. You referred to the Inf/Eff chart as "Attachment B", but you did not submit Attachment B. Therefore, I still can not tell what parameters caused the non-compliance for Searcy's IUs. For your convenience I have attached the latest forms and attachments which you could use to submit future reports.
2. ADEQ has switched from Quattro Pro to Excel for calculating MAHCs and WQ Levels. My "Excel" calculations indicate that Searcy's MAHCs and WQ Levels have not changed significantly. However, the WQ Level for Selenium contains a "typo". Please change the Selenium level/limit from "23 ug/l" to "28.8 ug/l" on the inf/eff chart in your next annual report.

You will not be required to submit any amendments to your 2008 annual report, but I encourage you to use the new attachments for your 2009 annual report.

Thanks!

Rufus, ADEQ

-----Original Message-----

**From:** Daniel Dawson [mailto:d.dawson@earthlink.net]  
**Sent:** Tuesday, March 18, 2008 10:43 AM  
**To:** Torrence, Rufus  
**Cc:** Bailey, John; Gilliam, Allen  
**Subject:** RE: AFIN 73-00055 AR0021601 City of Searcy Pretreatment Program Annual Status Report

Rufus:

I haven't changed anything. I am using the same report format that I have used for several years. I did not receive the new reporting form (received on 03/11/08) until after I had filed my annual report (3/04/08, via Certified Mail). The email I received from Allen on 03/11/08 stated:

"if you already have your annual report done on the old form, send it and worry about the new form next year. like i said, this form is not required, just recommended."

Thus, I did not worry about filing an amended report. In all 3 of these cases, the NOVs were issued for pH violations.

Regards,

NPDES PERMIT FILE  
 NPDES # AR0021601  
 AFIN # 73-00055  
 Permit PN  
 \_\_\_\_\_  
 Correspondence  
 \_\_\_\_\_  
 Technical Backup  
 \_\_\_\_\_  
 4/13/09 Date Scanned

Dan Dawson

---

**From:** Torrence, Rufus [mailto:TORRENCE@adeq.state.ar.us]

**Sent:** Tuesday, March 18, 2008 8:33 AM

**To:** Daniel Dawson

**Cc:** Bailey, John; Gilliam, Allen

**Subject:** AFIN 73-00055 AR0021601 City of Searcy Pretreatment Program Annual Status Report

Dan,

I am reviewing your report; even though it is fairly complete, you have changed the format of the attachments. Therefore, you did not show the nature of the non-compliance for your SIUs. I can deduce from your report that Land O'Frost, Road Systems, Inc and White County Med each had one NOV; however, you did not show whether BOD, O&G, etc caused the Noncompliance.

What caused the noncompliance for each of these SIUs?

I have attached the latest version of the forms which you should use to submit your annual reports. I have not calculated new MAHCs or WQS yet; nonetheless, they should be same. When I have the new MAHCs, I will send you another email with updated attachments.

Rufus J. Torrence, Engineer

**ARKANSAS DEPT OF ENVIRONMENTAL QUALITY**

Water Division

5301 Northshore Drive

North Little Rock, Arkansas 72118-5317

Phone: (501)682-0626

Fax: (501)682-0910

Email: torrence@adeq.state.ar.us

# ADEQ

ARKANSAS  
Department of Environmental Quality

April 15, 2009

Mr. Larry Dutton  
Cargill Turkey Products  
730 Randall Wobbe Lane  
Springdale, AR 72765

RE: Notice of Termination, Stormwater Construction General Permit, Cargill Large Scale Development, Springdale, AR (Permit Tracking No. **ARR151439**, AFIN **72-01662**)

Dear Mr. Dutton:

In accordance with receipt of the Notice of Termination (NOT), you are hereby notified that permit tracking number **ARR151439** has been terminated effective the date of this letter. Resumption of construction activities at this site resulting in a storm water discharge of any pollutant to waters of the State is unlawful and it will be necessary to file a new Notice of Intent prior to commencing of any such activities.

If you have any questions concerning this matter or need additional information, please feel free to contact the General Permits Section at (501) 682-0623.

Sincerely,

Mo Shafii  
Assistant Chief  
Water Division

MS:ag

cc: Electronic Filing (ARR151439, w/ attachments)  
Eric Fleming, Tech. Assistance Manager, Inspection Branch  
Cindy Garner, Tech. Assistance Manager, Enforcement Branch  
Jim Purvis, Permit Fee Coordinator  
David Ramsey, ICIS-NPDES, Lead Prog. Analyst

## SEARCY WATER AND SEWER SYSTEM

300 NORTH ELM STREET

P. O. BOX 1319

SEARCY, ARKANSAS

72145-1319

CLARENCE O. BUCKNER, MANAGER

March 4, 2009

MAR - 5 2009

CERTIFIED MAIL, Return Receipt Requested: 7008 1830 0000 2485 7070

Mr. Allen Gilliam  
Pretreatment Coordinator  
Arkansas Department of Environmental Quality  
5301 Northshore Dr.  
North Little Rock, AR 72218-5317

Re: NPDES Permit No. AR0021601  
Pretreatment Program Annual Status Report

Dear Allen:

In accordance with Part III (7)(d) of the above referenced NPDES permit, I am sending you the enclosed information.

The Searcy Pretreatment Program did not have any Significant Industrial Users that met the definition for Significant Noncompliance (SNC), as defined by 40 CFR 403.8(f)(2)(viii).

Referring to the subparagraphs of Part III (7)(d) in the permit, we submit the following information:

- (1) The updated list of significant industrial users is enclosed with this letter as Attachment "A". With the exception of the categorical IU's Semi-Annual Report, this information only reflects monitoring activity by the Utility and does not include all the self-monitoring activity as performed by each IU.
- (2) There were no service terminations or permit cancellations during this reporting period.
- (3) The Searcy POTW has not observed any interference, pass through, upset, or POTW permit violations known to be caused by contributions from our significant industrial users.
- (4) The results of the latest 40 CFR 122 Appendix D Table II and Table III analysis on the POTW influent and effluent is enclosed with this letter as Attachment "B".
- (5) Since there were no SIUs in Significant Noncompliance in this period, there is no newspaper publication of the SNC report.
- (6) See Attachment "A" enclosed.
- (7) Attachment "B" includes this information.

6725

inH

Also enclosed with this letter is our completed Pretreatment Performance Summary (PPS) form.

I trust that this information will meet with your approval. If there is any more information that you require in this regard, please do not hesitate to call me.

Sincerely,

SEARCY WATER AND SEWER SYSTEM

A handwritten signature in black ink, appearing to read "Dawson", with a long horizontal flourish extending to the right.

Daniel K. Dawson  
Assistant Manager/Pretreatment Coordinator

Enclosures: Attachment A, Status Report  
Attachment B, Annual Analysis Report Summary  
Attachment C, PPS Form

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: February 16, 2008 TO February 15, 2009**  
**TREATMENT PLANT: City of Searcy, Board of Public Utilities NPDES PERMIT #AR0021601**  
**AVERAGE POTW FLOW: 4.08 MGD % IU FLOW: 8.2%**

METALS, CYANIDE and PHENOLS (Total)	MAHC ug/l (2)	INFLUENT DATES SAMPLED				WQ level/ limit ug/l (2)	EFFLUENT DATES SAMPLED				LABORATORY ANALYSIS				
		Once/quarter (ug/l)	Once/quarter (ug/l)	Once/quarter (ug/l)	Once/quarter (ug/l)		Once/quarter (ug/l)	Once/quarter (ug/l)	Once/quarter (ug/l)	Once/quarter (ug/l)	EPA MQL (ug/l) (1)	EPA Method Used (1)	Detection Level Achieved (ug/l)		
		2/27/08	5/01/08	7/31/08	10/29/08		2/27/08	5/01/08	7/31/08	10/29/08					
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8	60		
Cadmium	17	0	0.84	0	0	0.0095	0	0	0	0	0.5	200.8	0.5		
Copper	112.5	21	21	20	15	29.6	6.5	6.0	6.5	5.0	0.5	200.8	0.5		
Lead	35.9	2.1	2.2	0	3.7	14	1.1	0	0	1.7	0.5	200.8	0.5		
Mercury	0.18	0.029	0.027	0.180	0	0.07	0	0	0	0	.005	245.7	.005		
Nickel	95.8	10	5.1	7.2	5.9	500	5.2	2.9	12	3.2	0.5	200.8	0.5		
Selenium	19.2	0	0	0	0	23	0	0	0	0	5	200.8	5		
Silver	12.4	7.3	1.7	1.6	1.0	2.8	0	0	0	0	0.5	200.8	0.5		
Zinc	300	120	81	180	80	261	72	48	69	47	20	200.7	20		
Chromium	350.5	0	0	0	0	1520	0	0	0	0	10	200.8	10		
Cyanide	96.7	0	0	0	0	30	0	0	0	0	10	SM4500- CN,C,E	10		
Arsenic	160	0	2.7	0	0	N/A	0	2.2	0	0	0.5	200.8	0.5		
Molybdenum	14.4	0	0	0	0	N/A	0	0	0	0	--	200.8	8		
Phenols	N/A	66	70	60	130	N/A	0	0	0	0	5	420.1	5		
Beryllium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5		
Thallium	N/A	0	0.54	0	0	N/A	0	1.2	0	0	0.5	200.8	0.5		
Flow, MGD	N/A	4.63	4.25	2.69	2.79	N/A									
(3) Chloroform															
Methylene Chloride															
Dichlorobromo- methane															
Tetrachloro- ethylene															
Toluene															

624

- (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 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.

MAHL - Maximum Allowable Headworks Level

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

**INDUSTRY INFORMATION for 12 months ending February 15, 2009**  
**Pretreatment Program Status Report**

NPDES Permit No. AR0021601

Part III (8)(D)(1)

IU No.	Industry Name	SIC Code	Categorical Determination	Control Document Status		Monitoring Activity		Compliance Status					
				Exists?	Type	Issued	Insp.	Samples	BMR	90	S-A	S-M	LIM
1	The Bryce Company	2641	Non-Categorical	Yes	Permit	3/16/2008	1	2	NA	NA	NA	C	C
2	White County Med S	8062	Non-Categorical	Yes	Permit	3/16/2008	1	2	NA	NA	NA	C	C
3	Land O' Frost, Inc.	2013	Non-Categorical	Yes	Permit	3/16/2008	1	2	NA	NA	NA	C	NC
4	Road Systems, Inc.	3715	Non-Categorical	Yes	Permit	3/16/2008	1	2	NA	NA	NA	C	C
5	Kohler	3469	Non-Categorical	Yes	Permit	3/16/2008	1	2	NA	NA	NA	C	C
7	Cintas, Inc.	7213	Non-Categorical	Yes	Permit	3/16/2008	1	2	NA	NA	NA	C	NC
9	Eaton Hydraulics	3494	Metal Finishing	Yes	Permit	3/16/2008	1	2	NA	NA	C	C	C
10	White County Med.	8062	Non-Categorical	Yes	Permit	3/16/2008	1	2	NA	NA	NA	C	C
11	Yarnell Ice Cream	2024	Non-Categorical	Yes	Permit	3/16/2008	1	2	NA	NA	NA	C	NC
12	Wal-Mart Dist. Ctr. 18	4224	Non-Categorical	Yes	Permit	3/16/2008	1	2	NA	NA	NA	C	C

**Monitoring Activity:**

Numeral indicates the number of times inspected or sampled during reporting period.

**Compliance Status Codes:**

- C--No violations during reporting period
- NC--One or more violations during reporting period, but not SN
- SN--Significantly Non-compliant, per EPA definition
- BMR--Baseline Monitoring Report submitted (new IUs only)
- 90--90-day Compliance Report submitted (new IUs only)
- S-A--Semi-Annual Report submitted (categorical IUs only)
- S-M--Compliance with Self-Monitoring requirements
- LIM--Compliance with effluent permit limitations

Attachment "A"



PRETREATMENT PERFORMANCE SUMMARY (PPS)

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 EPA AUTHORIZATION.

I. General Information

Control Authority Name Searcy Board of Public Utilities  
 Address P O Box 1319  
 City Searcy State/Zip AR 72145  
 Contact Person Daniel K Dawson Asst. Manager  
 (Position)  
 Contact Telephone ( 501) 268-2481  
 (Area Code)  
 NPDES Permit Nos. AR0021601  
 Reporting Period February 16, 2008 February 15, 2009  
 (Beginning month and year) (Ending month and year)  
 Total Number of Categorical IUs 1  
 Total Number of Significant Noncategorical IUs 9

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 Semiannual Reports/ Total No. Required . . . . .	<u>1 / 1</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 / 0</u>	<u>0 / 0</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . . . . .	<u>0 / 0</u>	

III. Compliance Monitoring Program

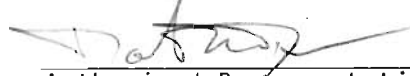
1) No. of Control Documents Issued/Total No.		
Required . . . . .	<u>1/1</u>	<u>9 / 9</u>
2) No. of Nonsampling Inspections Conducted . . . . .	<u>1</u>	<u>9</u>
3) No. of Sampling Visits Conducted . . . . .	<u>2</u>	<u>18</u>
4) No. of Facilities Inspected (nonsampling) . . . . .	<u>1</u>	<u>9</u>
5) No. of Facilities Sampled . . . . .	<u>1</u>	<u>9</u>

IV. 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</u>	<u>3</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 (attach newspaper publication) . . . . .	<u>0</u>	<u>0</u>
7) Amount of Penalties Collected (total dollars/IUs assessed) . . . . .	<u>0 / 0</u>	<u>0 / 0</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

3/04/2009  
 \_\_\_\_\_  
 Date

# PPS Program Report

\* NPDES ID: AR0021601

Permittee's Name City of Searcy

\* Report Received/Event Date: 03/05/2009

Date 4-10-2009

**Report Type**  
 Select a Program Report to add

- 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: 2-16-2008

**Significant Industrial Users (SIUs)**

- SIUs: 10
- 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: 3
- Administrative Orders Issued to SIUs: 0
- Civil Suits Filed Against SIUs: 0
- Criminal Suits Filed Against SIUs: 0

**Categorical Industrial Users (CIUs)**

- CIUs: 1
- CIUs in SNC: 0

**Penalties**

Dollar Amount of Penalties Collected: \$ 0

Industrial Users (IUs) from which Penalties have been collected: 0

**Other Information**

- SUO Reference: \_\_\_\_\_
- SUO Date: \_\_\_\_\_
- Annual Pretreatment Budget: \$ \_\_\_\_\_
- Pass-Through/Interference Indicator:
- Notification 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: 04/10/2009

Date of Most Recent Adoption of Technically Based Local Limits: 07/02/1996

Local Limit Pollutants: Metals & Cyanide

**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: \_\_\_\_\_