

From: [Gilliam, Allen](#)
To: [Mcavoy, Lance](#)
Cc: [Burrow, Kealey](#); [Ramsey, David](#); [Pemberton, Layne](#)
Subject: AR0021750_Fort Smiths Massard and P Street AR0033278 TBLL evaluations ADEQ concurrence and compliance schedule event_20150922
Date: Tuesday, September 22, 2015 3:11:59 PM

Lance,

Your submittal and this office's subsequent concurrence with your Technically Based Local Limits (TBLL) evaluation for both of the City's POTWs satisfies Section B. *Permit Compliance Schedule*, paragraph A.(2), "...a technical evaluation revising the current TBLL will be submitted within 12 months of the effective date of this permit." located on Page 1 of Part IB of your tracking permit #AR0021750.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Gilliam, Allen
Sent: Tuesday, September 22, 2015 1:19 PM
To: 'Mcavoy, Lance'
Cc: Burrow, Kealey
Subject: AR0021750_Fort Smiths Massard and P Street AR0033278 TBLL evaluation and ADEQ concurrence_20150922

Lance,

This office reviewed Massard's TBLL spreadsheets and found nothing questionable.

The Zn influent excursion can be brushed off because of your inhibition bench scale study showing the MAHC should be more the 5 times that number, or was that at P Street?.

And Mo's "exceedance" of WQ criteria is moot because AR has no WQ criteria for the element.

It appears you've used all the correct PPS (tab) "knowns" so your WQ numbers should be equivalent to any calculated within ADEQ's Water Division.

Excellent data set for site specific rem %s!

Don't know why you included land application sludge criteria since you currently landfill, but further satisfies the objectives of 40 CFR 403.5(c)(1).

I see most of your MAHLs are based on inhibition criteria with only two driven by WQ and one by

sludge criteria (which for now, you aren't worried about).

I also reviewed P Street's spreadsheets and it appears your "knowns" on the PPS tab are correct=>the WQ criteria. Again, great rem % data, but don't recognize your last few dates' schema on your domestic background tab. Can those unidentifiable numbers be corrected?

Was the RAS stream re-routed below the inf sampling pt. at P street prior to the exceedances of Ni and Zn's MAHC? I remember our conversations about this issue (wasn't this the case for both w.w. treatment plants?) just getting resolved after yrs of this office requesting your predecessor to fix the problem.

Can the Zn "excursion" of its MAHC be settled with the same argument as above? Ni's MAHC "excursion" is moot at this point because its driving criteria is based on land application of sludge. Mo's WQ "excursion" can be waved off with the same argument as above.

This office would consider this fairly detailed review and concurrence from this office notice that your TBLL evaluation is valid and correct arriving at each POTW's Max. Allowable Industrial Loadings from which to allocate local limits if ever necessary.

If there are further questions or comments please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports