



2/28/2024

State Pretreatment Coordinator  
Arkansas Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

To Whom it May Concern,

Please find attached a copy of the Annual Pretreatment Report for City Corporation for the 2023 reporting year as required by part II.7.D of NPDES permit AR0021768. This report contains the following sections:

1. Influent and effluent monitoring results
2. An updated list of significant industrial users (SIUs) and their status for the year
3. A list of industrial users in significant non-compliance for the 2023 reporting year
4. A copy of the newspaper publication for SIUs in significant non-compliance
5. The pretreatment performance summary

Please feel free to contact me if you have any questions or concerns about this report.

Respectfully,

*Michael B. Hall*

Pretreatment Coordinator

P.O. Box 3186  
Russellville, AR 72811-3186  
Phone: (479) 968-2080 ext. 224  
mhall@citycorporation.com



**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: JANUARY 1, 2023 to DECEMBER 31, 2023**  
**TREATMENT PLANT: Russellville City Corporation NPDES PERMIT #AR0021768**  
**AVERAGE POTW FLOW: 5.71 MGD %IU FLOW: 24.6%**

Metals, Cyanide, and Phenols	MAHC (Total) (µg/L) (2)	Influent Dates Sampled (µg/L) Once/quarter				WQ Level	Effluent Dates Sampled (µg/L) Once/quarter				Laboratory Analysis		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/L) (1)	EPA Method Used (1)	Detection Level Achieved (µg/L)
		1/17/2023	4/4/2023	7/5/2023	11/14/2023		1/17/2023	4/6/2023	7/6/2023	11/15/2023			
<b>Antimony</b>	N/A	<60	<5.0	<5.0	<5.0	N/A	<60	<5.0	<5.0	<5.0	60	EPA 200.8	60
<b>Arsenic</b>	9.4	45	17	4.2	5	349	7.5	3.6	1	0.91	0.5	EPA 200.8	0.5
<b>Beryllium</b>	11.8	<0.50	<0.50	<0.50	<0.50	5.9	<0.50	<0.50	<0.50	<0.50	0.5	EPA 200.8	0.5
<b>Cadmium</b>	5.6	<0.5	<0.50	<0.50	<0.50	1.8	<0.50	<0.50	<0.50	<0.50	0.5	EPA 200.8	0.5
<b>Chromium</b>	1000	17	13	13	20	295.4	<10	<10	<10	<10	10	EPA 1631E	0.005
<b>Copper</b>	44	15	17	25	17	9.2	4.7	2.9	3.7	4.8	0.5	EPA 200.8	0.5
<b>Cyanide (mg/L)</b>	18.7	<10	<10	<10	<10	5.8	<10	<10	<10	<10	10	EPA 200.8	5
<b>Lead</b>	6.9	0.8	1.3	1.5	1	2.7	<0.50	<0.50	<0.50	<0.50	0.5	EPA 200.8	0.5
<b>Mercury</b>	4.6	<0.005	<0.0005	0.0056	<0.0005	0.01	0.00126	0.0016	<0.0005	0.0015	0.005	EPA 200.8	10
<b>Molybdenum</b>	10.3	<10	<10	<10	<10	N/A	<10	<10	<10	<10	10	EPA 200.8	10
<b>Nickel</b>	70.4	6.9	4.7	6.9	9.1	97	3.7	2.8	4.4	4.5	0.5	SM 4500-CN C,E 2011	10
<b>Phenols</b>	N/A	97	71	110	360	N/A	<5.0	<5.0	<5.0	<8.2	5	EPA 200.8	0.5
<b>Selenium</b>	12.4	<5	<2.0	<2.0	<2.0	5.6	<5.0	<2.0	<2.0	<2.0	5	EPA 200.8	10
<b>Silver</b>	3.7	<0.5	<0.5	<0.5	0.67	0.9	<0.5	<0.50	<0.50	<0.50	0.5	EPA 420.1	5
<b>Thallium</b>	N/A	<0.5	<0.5	<0.5	<0.50	N/A	<0.5	<0.5	<0.50	<0.50	0.5	EPA 200.8	0.5
<b>Zinc</b>	225.1	66	82	140	76	85.5	44	28	50	60	20	EPA 200.8	0.5
<b>Flow, MGD</b>	N/A	8.737	5.283	4.111	4.712	N/A	6.874	4.086	3.159	3.526	N/A	Totalizer	N/A

(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.



## **List of Significant Industrial Users - January 1, 2023 through December 31, 2023**

### ***Categorical Industries***

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**Name of Industry:** Aqua Contour Cutting, Inc.

**SIC Code:** 3499

**Category:** Metal finishing

**Control Document:** Yes

**Effective date:** 1/1/2022

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2023 reporting year.

**Name of Industry:** Grace Manufacturing, Inc.

**SIC Code:** 3423

**Category:** Metal finishing

**Control Document:** Yes

**Effective date:** 11/1/2021

**Times inspected:** 1

**Times sampled:** 1 (both outfalls)

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2023 reporting year.

**Name of Industry:** P.O.M., Inc.

**SIC Code:** 3999

**Category:** Metal finishing

**Control Document:** Yes

**Effective date:** 12/14/2021

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2023 reporting year.



**Name of Industry:** Taber Extrusions, LLC

**SIC Code:** 3354

**Category:** Aluminum forming

**Control Document:** Yes

**Effective date:** 12/1/2021

**Times inspected:** 1

**Times sampled:** 1

Current compliance status: Compliant

Other: Notice of Violation issued three times (May, June, and July) for excessive Oil and Grease. IU was in significant Non-compliance for the third quarter of 2023.



### ***Non-Categorical Industries***

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**Name of Industry:** Bridgestone Tube

**SIC Code:** 3011

**Control Document:** Yes

**Effective date:** 11/1/2021

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2023 reporting year.

**Name of Industry:** Conagra Foods

**SIC Code:** 2038

**Control Document:** Yes

**Effective date:** 7/1/2022

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2023 reporting year.

**Name of Industry:** Hackney-Ladish, Inc.

**SIC Code:** 3462

**Control Document:** Yes

**Effective date:** 12/7/2021

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2023 reporting year.

**Name of Industry:** International Paper – Container Division U. S. A.

**SIC Code:** 2653

**Control Document:** Yes

**Effective date:** 12/7/2021

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2023 reporting year.



**Name of Industry:** International Paper – Russellville Sheet Feeder

**SIC Code:** 2653

**Control Document:** Yes

**Effective date:** 12/7/2021

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** Notice of Violation issued in June for low pH. Issue was quickly corrected and has not reoccurred.

**Name of Industry:** MAHLE Engine Components

**SIC Code:** 3714

**Control Document:** Yes

**Effective date:** 8/1/2021

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2023 reporting year.

**Name of Industry:** Premium Protein Products, LLC

**SIC Code:** 2077

**Control Document:** Yes

**Effective date:** 11/1/2021

**Times inspected:** 1

**Times sampled:** 2

**Current compliance status:** Non-compliant

**Other:** Premium Protein is in significant non-compliance (chronic) for the 2023 reporting year for the exceedance of ammonia. Premium Protein is under an administrative compliance order to bring the facility into compliance with their permit by December 31<sup>st</sup>, 2023. Failure to do this will lead to civil penalties, and/or termination of their discharge permit.

**Name of Industry:** Rockline Industries

**SIC Code:** 2676

**Control Document:** Yes

**Effective date:** 12/1/2023

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** Notice of Violation issued in August for low pH. Issue was quickly corrected and has not reoccurred.



**Name of Industry:** Sugar Creek Foods

**SIC Code:** 2024

**Control Document:** Yes

**Effective date:** 12/14/2021

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** Notice of Violation issued in June for high pH. Issue was quickly corrected and has not reoccurred.

**Name of Industry:** Tyson River Valley Hatchery

**SIC Code:** 0254

**Categorical:** No

**Control Document:** Yes

**Effective date:** 12/14/2021

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2023 reporting year.

**Name of Industry:** Tyson Tyler Road

**SIC Code:** 2653

**Categorical:** No

**Control Document:** Yes

**Effective date:** 6/1/2020

**Times inspected:** 1

**Times sampled:** 1

**Current compliance status:** Compliant

**Other:** No issues of non-compliance occurred during the 2022 reporting year.



**ATTACHMENT A**  
**PRETREATMENT PROGRAM STATUS REPORT**  
**UPDATED SIGNIFICANT INDUSTRIAL USERS LIST**

Industrial User Name	SIC/NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Reports				Effluent Limits
			Y/N	Last Action				BMR	90-day Compliance	Semi-Annual	Self-Monitoring	
Aqua Contour Cutting	3499	433.15	Y	1/1/2022	N	1	1			C	C	C
Bridgestone Tube	3011		Y	11/1/2021	N	1	2 <sup>(2)</sup>			C	C	C
ConAgra Foods	2038		Y	7/1/2021	N	1	1			N/A <sup>(1)</sup>	C	C
Grace Manufacturing	3423	433.15	Y	11/1/2021	N	1	1			C	C	C
Hackney-Ladish	3462		Y	12/7/2021	N	1	1			C	C	C
International Paper	2653		Y	12/7/2021	N	1	1			N/A <sup>(1)</sup>	C	C
International Paper - Sheet Feeder	2653		Y	12/7/2021	N	1	2 <sup>(2)</sup>			N/A <sup>(1)</sup>	C	NC
MAHLE	3714		Y	8/1/2021	N	1	1			C	C	C
P.O.M.	3999	433.15	Y	12/14/2021	N	1	1			C	C	C
Premium Protein Products	2077		Y	11/1/2021	N	1	3			N/A <sup>(1)</sup>	C	NC
Rockline Industries	2676		Y	12/1/2023	N	1	1			N/A <sup>(1)</sup>	C	NC
Sugar Creek Foods	2024		Y	12/14/2021	N	1	2 <sup>(2)</sup>			N/A <sup>(1)</sup>	C	NC
Taber Extrusions	3354	467.35	Y	12/1/2021	N	1	2 <sup>(2)</sup>			C	C	NC
Tyson River Valley Hatchery	254		Y	12/14/2021	N	1	1			N/A <sup>(1)</sup>	C	C
Tyson Tyler Road	2653		Y	6/1/2020	N	1	1			N/A <sup>(1)</sup>	C	C

Footnotes:

1: Industry monitors monthly

2: Additional samples were collected for Arsenic and Zinc monitoring as per ADEQ's directive on February 28<sup>th</sup>, 2023







**ATTACHMENT C**  
**PRETREATMENT PERFORMANCE SUMMARY (PPS)**

**NOTE:** ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY ADEQ. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT DEPARTMENT AUTHORIZATION.

**I. General Information**

**Control Authority Name:** City Corporation – Russellville Water & Sewer

**Address:** P.O. Box 3186, Russellville, AR 72811

**Contact Person:** Michael Hall

**Position:** Pretreatment Coordinator

**Contact Phone:** (479) 968-2080 Ext. 224

**NPDES Permit No.:** AR0021768

**Reporting Period:** January 1, 2023 to December 31, 2023

**Number of Categorical IUs:** 4

**Number of Significant Noncategorical IUs:** 11

**Total Number of Non-Significant (yet permitted) IUs:** 0

**II. Significant Industrial User Compliance**

	Significant Industrial Users	
	Categorical	Non-Categorical
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/No. Required	<u>4/4</u>	<u>11/11</u>
4) No. of SIUs Meeting Compliance Schedule/Total No. Required	<u>0/0</u>	<u>0/0</u>
5) No. of SIUs in Significant Noncompliance/Total No. of SIUs	<u>1/4</u>	<u>1/11</u>
6) Rate (%) of Significant Noncompliance for all SIUs		<u>13%</u>

**III. Compliance Monitoring Program**

	Significant Industrial Users	
	Categorical	Non-Categorical
1) No. of Control Documents Issued/Total No. Required	<u>4/4</u>	<u>11/11</u>
2) No. of Non-sampling Inspections Conducted/Total No. Required	<u>4/4</u>	<u>11/11</u>
3) No. of Sampling Visits Conducted/Total No. Required	<u>5/4</u>	<u>17/11</u>
4) No. of Facilities Inspected (nonsampling)	<u>4/4</u>	<u>11/11</u>
5) No. of Facilities Sampled/Total No. Required	<u>4/4</u>	<u>11/11</u>



IV. Enforcement Actions

	Significant Industrial Users	
	Categorical	Non-Categorical
1) No. of Compliance Schedules Issued/No. Required	<u>0/0</u>	<u>0/0</u>
2) No. of Notices of Violation Issued to SIUs	<u>3</u>	<u>13</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>1</u>	<u>1</u>
7) Amount of Penalties (not surcharges) Collected	<u>0</u>	<u>0</u>
8) Other Actions (sewer bans, etc)	<u>0</u>	<u>0</u>

ATTACHMENT D

Proof of publication in the local newspaper.

**INDUSTRIAL PRETREATMENT PROGRAM  
SIGNIFICANT NONCOMPLIANCE  
2023 ANNUAL REPORT**

City Corporation, as the operating agency of the Russellville Water & Sewer System, is required by NPDES Permit No. AR0021786, Part II, (7), D, to prepare annually a list of industrial users which during the preceding twelve months were in significant noncompliance with applicable pretreatment requirements. The following permitted industrial users were found to be in significant noncompliance for the 2023 pretreatment reporting year:

**PREMIUM PROTEIN PRODUCTS**, Permit No. WDP 2006  
Chronic violation for ammonia discharge limitation  
40 CFR 403.8 (f)(2)(v)(A)

**TABER EXTRUSIONS, LLC**, Permit No. WDP 2005  
Technical Review Criteria violation for  
Oil & Grease discharge limitation  
40 CFR 403.8 (f)(2)(v)(B)

Inquiries into the above information can be made to:

Chief Executive Officer  
City Corporation  
Post Office Box 3196  
Russellville, Arkansas 72811

Business hours are 8:00 a.m. to 5:00 p.m., Monday through Friday.  
Steve Mellett, Chief Executive Officer  
This legal published in The Courier on February 2, 2024.

PROOF OF PUBLICATION

STATE OF ARKANSAS  
COUNTY OF POPE

} SS:

I, Judy Manning, of the Council, a newspaper published at Russellville, Arkansas, and having a bona fide circulation in Pope County, Arkansas, for one year next preceding the first insertion of, and during the publication of the Notice hereto attached, do solemnly swear that said Notice was published in the above named

paper 1 issues consecutively bearing date of

February 2, 2024

Noncompliance Report 2023

Ad# 70881481

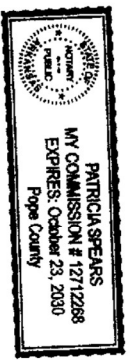
Printer's Fee \$ 78.39

Subscribed and sworn to before the undersigned, this 2

day of February, 2024.

My commission expires October 23, 2030.

[Signature]  
Notary Public





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.

*Michael B. Hall*  
Pretreatment Coordinator

Date: 1/31/2024

## Alan Anderson (adpce.ad)

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**From:** Michael Hall <mhall@citycorporation.com>  
**Sent:** Thursday, March 28, 2024 9:36 AM  
**To:** Alan Anderson (adpce.ad)  
**Subject:** RE: Question concerning 2023 pretreatment report

Alan,

As per our phone conversation earlier this morning:

Line 3 in section IV (Enforcement Actions) is incorrect in the pretreatment summary. It should match the data in Attachment B. It should show 0 Categorical A.O.'s issued, and one Non-categorical A.O. issued.

*Michael B. Hall*

*Pretreatment Coordinator*

Office: (479) 968-2080 ext. 224



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**From:** Alan Anderson (adpce.ad) <Alan.Anderson@adeq.state.ar.us>  
**Sent:** Wednesday, March 27, 2024 15:31  
**To:** Michael Hall <mhall@citycorporation.com>  
**Subject:** Question concerning 2023 pretreatment report

You don't often get email from [alan.anderson@adeq.state.ar.us](mailto:alan.anderson@adeq.state.ar.us). [Learn why this is important](#)

Michael:

If you get a chance tomorrow (Thursday) would you mind giving me a call. I have a question about the 2023 pretreatment summary.

Thanks  
alan

**Alan Anderson, MPA** | Pretreatment and Enforcement Coordinator  
**Division of Environmental Quality** | **Office of Water Quality**  
**Enforcement Section**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0635 | c: 501.837.6954 | e: [alan.anderson@example.com](mailto:alan.anderson@example.com)



**ARKANSAS**  
ENERGY & ENVIRONMENT

## Alan Anderson (adpce.ad)

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**From:** Alan Anderson (adpce.ad)  
**Sent:** Thursday, March 28, 2024 2:16 PM  
**To:** 'Michael Hall'  
**Subject:** AR0021768- January 1, 2023 through December 31, 2023 Pretreatment Program Annual Report

Michael:

City Corporation-Russellville Water and Sewer's January 1, 2023 through December 31, 2023 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 C.F.R. § 403.12(i). If you have any questions, please feel free to contact me.

Alan Anderson, MPA | Pretreatment and Enforcement Coordinator  
Division of Environmental Quality | Office of Water Quality  
Enforcement Section  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0635 | c: 501.837.6954 | e: [alan.anderson@example.com](mailto:alan.anderson@example.com)



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