

Henderson, Katie

From: Torrence, Rufus
Sent: Monday, March 12, 2012 8:39 AM
To: RBradley@citycorporation.com
Cc: Henderson, Katie
Subject: AFIN 58-00105 AR0021768 City of Russellville 2011 Annual Report
Attachments: RSVL 2011 Annual Report.pdf



March 9, 2012

Randy Bradley, Pretreatment Coordinator
City Corporation
Russellville Water and Sewer System
P O Box 3186
Russellville, Arkansas 72811-3186

Re: City of Russellville 2011 Annual Pretreatment Report
(Permit No. AR0021768, AFIN 58-00105)

Dear Mr. Bradley:

The Department has reviewed the City's 2011 Annual Report. The report is complete. Nonetheless, the Department has concerns.

Please note that the October 14, 2011 effluent concentration (110 µg/l) exceeded the permit limit (85.5 µg/l) for Zinc.

In reference to Attachment B, the City simply inserted "X's" into the chart for NOVs. Please note that the heading is "Number of Action Taken". The City must show how many NOVs were issued to each SIU. This concern was also noted in the last Department's letter/email (dated March 3, 2011). Please make a note as a reminder for the 2012 annual report.

Finally, please include a cover letter with each report. The letter must be addressed to the appropriate pretreatment engineer.

The Department appreciates the City's continued efforts in annual reporting and the City will not be required to submit any additional information for the 2011 annual report.

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

Sincerely,



Rufus Torrence, Pretreatment Engineer
Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5901 NORTHSIDE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-9317 / TELEPHONE 501-682-
www.adeq.state.ar.us

**INDUSTRIAL PRETREATMENT PROGRAM
SIGNIFICANT NONCOMPLIANCE
2011 ANNUAL REPORT**

City Corporation, as the operating agency of the Russellville Water & Sewer System, is required by NPDES Permit No. AR0021768, Part II, 13, D, to "prepare annually a list of industrial users which during the preceding twelve months were in significant noncompliance with applicable pretreatment standards." The following permitted industrial users were found to be in significant non-compliance for the 2011 pretreatment reporting year:

SUGAR CREEK FOOD INTERNATIONAL INC., Permit No. WDP 2000 Technical Review Criteria violation for BOD discharge limitations.
CFR 403.8 (f)(2)(vii)(B)

TABER EXTRUSION — LIMITED PARTNERSHIP, Permit No. WDP 2005 Technical Review Criteria violation for Oil & Grease discharge limitations.
CFR 403.8 (f)(2)(vii)(B)

Inquiries into the above information can be made to:

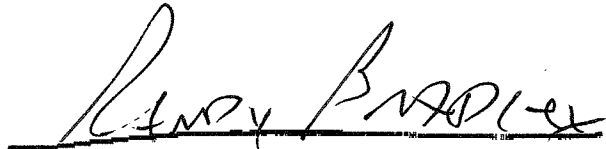
Pretreatment Coordinator
City Corporation
Post Office Box 3186
Russellville, Arkansas 72811

Business hours are 8:00 a.m. to 4:00 p.m., Monday through Friday.

Craig Noble
General Manager

This legal published in The Courier Feb 26, 2012.

Please proof ?
fax back to 918-2832.


signature

- ① inf/eff logged
- ② ICIS coded/cover letter missing
- ③ SIU's checked
- ④ Annual Report Form updated

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: January 1, 2011 TO December 31, 2011
TREATMENT PLANT: City Corporation NPDES PERMIT #AR0021768
AVERAGE POTW FLOW: 6.136 MGD % IU FLOW: 16.8%

95780
RECEIVED
 MAR - 2 2012
 By: KH

| METALS, CYANIDE and PHENOLS | MAHC (Total) (µg/l) (2) | INFLUENT DATES SAMPLED (µg/l) Once/quarter | | | | WQ level/ limit (µg/l) (2) | 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) | | | |
| | | 2/15/11 | 4/19/11 | 9/21/11 | 10/13/11 | | 2/16/11 | 4/20/11 | 9/22/11 | 10/14/11 | | | | | | |
| Antimony | N/A | 0 | 0 | 0 | 0 | N/A | 0 | 0 | 0 | 0 | 0 | 0 | 60 | 200.8 | 60 | |
| Cadmium | 5.58 | 0 | 0 | 0 | 0 | 1.84 | 0 | 0 | 0 | 0 | 0 | 0 | 0.5 | 200.8 | 0.5 | |
| Copper | 36.95 | 21 | 31 | 37 | 49 | 9.24 | 3.9 | 4.2 | 8.9 | 3.9 | 3.9 | 3.9 | 0.5 | 200.8 | 0.5 | |
| Lead | 6.95 | 1.4 | 1.2 | 2.5 | 4.1 | 2.71 | 0 | 0 | 0 | 2.2 | 2.2 | 2.2 | 0.5 | 200.8 | 0.5 | |
| Mercury | 0.03 | 0 | 0.022 | 0.087 | 0.018 | 0.013 | 0.0022 | 0.0072 | 0.0096 | 0.005 | 0.005 | 0.005 | .005 | 245.7 | 0.0018 | |
| Nickel | 53.43 | 8.6 | 13 | 13 | 12 | 97.0 | 7.3 | 7.4 | 8.0 | 0 | 0 | 0 | 0.5 | 200.8 | 0.5 | |
| Selenium | 10.69 | 0 | 0 | 0 | 0 | 5.58 | 0 | 0 | 0 | 0 | 0 | 0 | 5 | 200.8 | 5 | |
| Silver | 3.73 | 0.97 | 1 | 1.9 | 1.4 | 0.93 | 0 | 0 | 0 | 2.5 | 2.5 | 2.5 | 0.5 | 200.8 | 0.5 | |
| Zinc | 475.17 | 190 | 61 | 150 | 140 | 86.0 | 0 | 22 | 34 | 110 | 110 | 110 | 20 | 200.8 | 20 | |
| Chromium | 195.49 | 14 | 0 | 16 | 11 | 295.0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 200.8 | 10 | |
| Cyanide | 18.72 | 0 | 0 | 0 | 0 | 5.8 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | SM4500 | 10 | |
| Arsenic | 8.91 | 0.74 | 0 | 0.92 | 0.86 | 349.0 | 0 | 0 | 0.60 | 0.72 | 0.72 | 0.72 | 0.5 | 200.8 | 0.5 | |
| Molybdenum | 8.02 | 0 | 0 | 0 | 0 | N/A | 0 | 0 | 0 | 0 | 0 | 0 | -- | 200.8 | 8 | |
| Phenols | N/A | 13 | 14 | 27 | 30 | N/A | 0 | 0 | 0 | 17 | 17 | 17 | 5 | 420.1 | 5 | |
| Beryllium | 11.83 | 0 | 0 | 0 | 0 | 5.92 | 0 | 0 | 0 | 0 | 0 | 0 | 0.5 | 200.8 | 0.5 | |
| Thallium | N/A | 0 | 0 | 0 | 0 | N/A | 0 | 0.73 | 0 | 0 | 0 | 0 | 0.5 | 200.8 | 0.5 | |
| Flow, MGD | N/A | 7.920 | 6.738 | **** | **** | N/A | 7.186 | 6.125 | 4.294 | 4.731 | | | | | | |
| (3) | | | | | | | | | | | | | | | | |
| *** Inf flow meter broken | | | | | | | | | | | | | | | | |
| Bis(2- ethylhexyl)phthalat | | 20 | | | | | | | | | | | | EPA 625 | 10 | |

ATTACHMENT A
PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

| Industrial User Name | NAICS Code | 40 CFR XXX or N/A | Control Document | | New User | Times Inspected | Times Sampled | Compliance Status (C, NC, or SNC) | | | Permit Limits |
|---|------------|-------------------|------------------|-------------|----------|-----------------|---------------|-----------------------------------|-------------------|-------------|---------------|
| | | | Y/N | Last Action | | | | BMR | 90-day Compliance | Semi Annual | |
| Con Agra Foods | 2038 | | Y | 16Dec10 | N | 2 | 2 | | C | C | C |
| MAHIE | 3714 | | Y | 16Dec10 | N | 2 | 2 | | C | C | C |
| Sugar Creek Foods, International | 2024 | | Y | 16Dec10 | N | 2 | 2 | | C | C | SNC/BOD |
| Bridgestone Tube | 3011 | | Y | 16Dec10 | N | 2 | 2 | | C | C | C |
| International Paper | 2653 | | Y | 16Dec10 | N | 2 | 2 | | C | C | C |
| Hackney Ladish | 3462 | | Y | 16Dec10 | N | 2 | 2 | | C | C | C |
| POM, Inc. | 3999 | 433.15 | Y | 16Dec10 | N | 2 | 2 | | C | C | C |
| Premium Protein Products | 2077 | | Y | 16Dec10 | N | 2 | 21 | | C | C | NC/HN3-N |
| Taber Extrusions | 3354 | 467.35 | Y | 16Dec10 | N | 2 | 2 | | C | C | SNC / O&G |
| Tyson Foods, RVH | 0254 | | Y | 16Dec10 | N | 2 | 2 | | C | C | C |
| Tyson Foods, Tyler Road | 2017 | | Y | 16Dec10 | N | 2 | 2 | | C | C | C |
| International Paper, 16 th St. | 2653 | | Y | 16Dec10 | N | 2 | 2 | | C | C | C |
| Grace Manufacturing | 3423 | 433.15 | Y | 26OCT11 | N | 2 | 2 | | C | C | NC/Cr |

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

Address Post Office Box 3186

City Russellville State/Zip Arkansas 72811

Contact Person Randy Bradley Position Pretreatment Coordinator

Contact Telephone 479-968-4989 NPDES Permit Nos. AR0021768

Reporting Period January 2011 December 2011

(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 3

Total Number of Significant Noncategorical IUs 10

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

II. Significant Industrial User Compliance

| | <u>SIGNIFICANT INDUSTRIAL USERS</u> | |
|--|-------------------------------------|-----------------------|
| | <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>3/3</u> | <u>10/10</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>1/3</u> | <u>1/10</u> |
| 6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . . | | <u>2/13</u> |

III. Compliance Monitoring Program


| | <u>SIGNIFICANT</u> <u>Categorical</u> | <u>INDUSTRIAL USERS</u> <u>NonCategorical</u> |
|--|--|--|
| 1) No. of Control Documents Issued/Total No. Required. | <u>3/3</u> | <u>10/10</u> |
| 2) No. of Nonsampling Inspections Conducted. | <u>6/6</u> | <u>20/20</u> |
| 3) No. of Sampling Visits Conducted. | <u>6/6</u> | <u>39/20</u> |
| 4) No. of Facilities Inspected (nonsampling) | <u>3/3</u> | <u>10/10</u> |
| 5) No. of Facilities Sampled | <u>3/3</u> | <u>10/10</u> |

IV. Enforcement Actions

| | <u>SIGNIFICANT</u> <u>Categorical</u> | <u>INDUSTRIAL USERS</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>2</u> | <u>8</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 (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

Date March 1, 2012

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

CONT

Report Information

* Pretreatment Performance Summary Start Date: 01/01/2011

Significant Industrial Users (SIUs)

- SIUs: 13
- SIUs Without Control Mechanism: 0
- SIUs Not Inspected: 0
- SIUs Not Sampled: 0
- SIUs in SNC with Pretreatment Standards: 2
- SIUs in SNC with Reporting Requirements: 0
- SIUs in SNC with Pretreatment Schedule: 0
- SIUs in SNC Published in Newspaper: 2
- SIUs Schedules: 0
- Violation Notices Issued to SIUs: 10
- Administrative Orders Issued to SIUs: 0
- Civil Suits Filed Against SIUs: 0
- Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

- CIUs: 3
- CIUs in SNC: 1

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:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

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: