

## Jamie Belcourt (adpce.ad)

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**From:** Jamie Belcourt (adpce.ad)  
**Sent:** Tuesday, February 28, 2023 12:30 PM  
**To:** 'Greg Kremers'  
**Cc:** Stacie Wassell (adpce.ad); Richard Healey (adpce.ad); David Ramsey (adpce.ad)  
**Subject:** City of Russellville AR0021768 Annual Pretreatment Program Report

Mr. Kremers,

The City of Russellville's January 1, 2022 – December 30, 2022 Pretreatment Program Annual Report (NPDES Permit AR0021768) was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 C.F.R. § 403.12(i).

However, during review of the submitted report, it was noted in the monitoring results of your submitted report that the maximum allowable headworks concentration (MAHC) for arsenic was exceeded for each quarter during the reporting year. Additionally, it was noted that the MAHC for zinc was exceeded for the first quarter of the reporting year. DEQ requests that the City of Russellville address the arsenic and zinc exceedances of the MAHC by investigating the cause of the high loading, identifying any noncomplying industries, and increasing monitoring of its industrial users. Please provide a response detailing the City's investigation into the cause, documentation of any industrial not in compliance, and results of additional monitoring conducted.

Further, it was noted during review of this report that the water quality level/limit is 5.8 µg/L for this permit and the detection level achieved using Standard Method (SM) 4500-CN C, E was 10 µg/L. Please ensure that the water quality level/limit is met in the future.

If you have any questions, please feel free to reach out to me.

Thank you,

**Jamie Belcourt** | State Pretreatment Coordinator  
**Division of Environmental Quality | Office of Water Quality**  
**Policy and Administration**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0858 | c: 501.287.8714 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



**ARKANSAS**  
ENERGY & ENVIRONMENT

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**From:** Greg Kremers [<mailto:gkremers@citycorporation.com>]  
**Sent:** Friday, February 17, 2023 2:17 PM  
**To:** Pretreatment-Submittals  
**Subject:** City Corporation 2022 Pretreatment Report

To Whom it May Concern,

Attached is the 2022 Pretreatment Annual Report for City Corporation - Russellville Water & Sewer. Please confirm receipt.

Thanks

Greg Kremers  
Wastewater & Pretreatment Operations Director

City Corporation  
Russellville Water & Sewer System  
205 West Third Place  
PO Box 3186  
Russellville, AR 72811  
Phone 479.968.2080 Ext. 236  
Main 479.968.2105





205 W 3<sup>rd</sup> Place P.O. Box 3186  
Russellville, AR 72811-3186  
Office (479) 968-2105

February 17, 2023

Office of Water Quality - Permits Branch  
Arkansas Energy & Environment – Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Dear Sir or Madam,

Enclosed, please find the Pretreatment Annual Report for City Corp - Russellville Water & Sewer for the 2022 reporting year as required by Part II.7.D of NPDES permit AR0021768. The report will include influent and effluent monitoring results, a synopsis of significant industrial users, program status report, industries in significant non-compliance, the pretreatment performance summary, and the proof of publication for significant noncompliance.

Should you require additional information, feel free to contact me.

Respectfully,

A handwritten signature in black ink that reads "Greg Kremers". The signature is written in a cursive style with a large, looping initial "G".

Greg Kremers  
Wastewater & Pretreatment Operations Director  
P.O. Box 3186  
Russellville, AR 72811-3186  
Phone 479.968.2080 Ext. 236  
[gkremers@citycorporation.com](mailto:gkremers@citycorporation.com)

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: January 1, 2022 TO December 31, 2022**  
**TREATMENT PLANT: Russellville City Corporation NPDES PERMIT #AR0021768**  
**AVERAGE POTW FLOW: 5.42 MGD % IU FLOW: 24.6 %**

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	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)		
		1/6/22	6/16/22	9/8/22	10/5/22		1/7/2022	6/17/22	9/9/22	10/6/22				
Antimony	N/A	<60	<60	<60	<60	N/A	<60	<60	<60	<60	EPA 200.8	60	EPA 200.8	60
Cadmium	5.6	<0.5	<0.5	<0.5	<0.5	1.8	<0.5	<0.5	<0.5	<0.5	EPA 200.8	0.5	EPA 200.8	0.5
Copper	44.0	17	23	25	29	9.2	3.5	5.3	6.7	6.2	EPA 200.8	0.5	EPA 200.8	0.5
Lead	6.9	0.98	2.3	1.5	1.5	2.7	<0.5	0.6	<0.5	<0.5	EPA 200.8	0.5	EPA 200.8	0.5
Mercury	4.6	0.031	0.042	0.0098	0.034	0.01	<0.005	0.003	0.0010	0.00095	EPA 1631E	0.005	EPA 1631E	0.005
Nickel	70.4	4.5	5.6	5.6	5.7	97	3.1	4	3.8	3.2	EPA 200.8	0.5	EPA 200.8	0.5
Selenium	12.4	<5	<5	<5	<5	5.6	<5	<5	<5	<5	EPA 200.8	5	EPA 200.8	5
Silver	3.7	<0.5	0.57	<0.5	<0.5	0.9	<0.5	<0.5	<0.5	<0.5	EPA 200.8	0.5	EPA 200.8	0.5
Zinc	225.1	420	130	150	160	85.5	55	96	65	61	EPA 200.8	20	EPA 200.8	10
Chromium	1000	<10	<10	10	11	295.4	<10	<10	<10	<10	EPA 200.8	10	EPA 200.8	10
Cyanide	18.7	<10	<20	<10	<10	5.8	<10	<10	<10	<10	SM 4500-CN C.F.2011	10	SM 4500-CN C.F.2011	10
Arsenic	9.4	16	27	45	18	349	5.3	2.9	88	6.2	EPA 200.8	0.5	EPA 200.8	0.5
Molybdenum	10.3	12	<10	<10	13	N/A	11	<10	<10	11	EPA 200.8	--	EPA 200.8	10
Phenols	N/A	42	62	91	150	N/A	47	6.6	<5	5	EPA 420.1	5	EPA 420.1	5
Beryllium	11.8	<0.5	<0.5	<0.5	<0.5	5.9	<0.5	<0.5	<0.5	<0.5	EPA 200.8	0.5	EPA 200.8	0.5
Thallium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	EPA 200.8	0.5	EPA 200.8	0.5
Flow, MGD (3)	N/A	6.309	6.888	4.460	4.514	N/A	5.907	3.832	4.976	3.030	Totalizer	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.



# City Corporation – Russellville Water & Sewer

## List of Significant Industrial Users - January 1, 2022 through December 31, 2022

### Categorical Industries

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

SIC Code: 3499

Categorical: Metal finishing

Control Document: Yes

Effective date: 1/1/2022

Times inspected: 1

Times sampled: 3

Current compliance status: Compliant

Other: Notice of violation issued for late submittal of self-monitoring flow report (Mar. 2022)

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

SIC Code: 3423

Categorical: 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 incurred during the 2022 reporting year.

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

SIC Code: 3999

Categorical: 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 incurred during the 2022 reporting year.

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

SIC Code: 3354

Categorical: 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 for exceedance of daily max for zinc (July-Dec semiannual). The reason for exceedance was corrected, the discharge retested, and shown to be in compliance. Monthly average O&G exceeded in the month of December. Retest on January 6, 2023 resulted in an O&G concentration below permit limit.

**Non-categorical Industries**

Name of Industry: **Bridgestone Americas Tube**  
SIC Code: 3011  
Categorical: No  
Control Document: Yes  
Effective date: 11/1/2021  
Times inspected: 1  
Times sampled: 1  
Current compliance status: Compliant  
Other: No issues of non-compliance incurred during the 2022 reporting year.

Name of Industry: **Conagra Foods**  
SIC Code: 2038  
Categorical: No  
Control Document: Yes  
Effective date: 7/1/2022  
Times inspected: 1  
Times sampled: 1  
Current compliance status: Compliant  
Other: Conagra took over operational duties of the pretreatment facility from City Corporation at the end of May. Permit reissued July 1, 2022. No issues of non-compliance incurred during the 2022 reporting year.

Name of Industry: **Hackney-Ladish, Inc.**  
SIC Code: 3462  
Categorical: No  
Control Document: Yes  
Effective date: 12/7/2021  
Times inspected: 1  
Times sampled: 1  
Current compliance status: Compliant  
Other: No issues of non-compliance incurred during the 2022 reporting year.

Name of Industry: **International Paper – Container Division U. S. A.**  
SIC Code: 2653  
Categorical: No  
Control Document: Yes  
Effective date: 12/7/2021  
Times inspected: 1  
Times sampled: 1  
Current compliance status: Compliant  
Other: No issues of non-compliance was incurred during the 2022 reporting year.

Name of Industry: **International Paper – Russellville Sheet Feeder**  
SIC Code: 2653  
Categorical: No  
Control Document: Yes  
Effective date: 12/7/2021  
Times inspected: 1  
Times sampled: 1  
Current compliance status: Compliant  
Other: NOV issued on April 11 for pH below 5.0 s.u. during compliance monitoring. Issue was corrected.

Name of Industry: **MAHLE Engine Components**

SIC Code: 3714

Categorical: No

Control Document: Yes

Effective date: 8/1/2021

Times inspected: 1

Times sampled: 1

Current compliance status: Compliant

Other: Notice of violation issued for late submittal of self-monitoring flow report (June 2022).

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

SIC Code: 2077

Categorical: No

Control Document: Yes

Effective date: 11/1/2021

Times inspected: 2

Times sampled: 3

Current compliance status: Not in compliance

Other: Premium Protein is in significant non-compliance (chronic) for the 2022 reporting year for the exceedance of NH<sub>3</sub>-N. Premium Protein Products is currently under an administrative compliance order to bring the facility into compliance by December 31, 2023. Failure to do so will result in the loss of its permit and termination of service.

Name of Industry: **Rockline Industries**

SIC Code: 2676

Categorical: No

Control Document: Yes

Effective date: 12/1/2021

Times inspected: 1

Times sampled: 1

Current compliance status: Compliant

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

Name of Industry: **Sugar Creek Foods**

SIC Code: 2024

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 incurred during the 2022 reporting year.

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 incurred during the 2022 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 incurred 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	Compliance Status (N/A, C, NC, or SNC)				Effluent Limits	
			Y/N	Last Action				BMR	90-day Compliance	Semi Annual Reports	Self Monitoring		
Aqua Contour Cutting	3499	433.15	Y	1/1/2022	N	1	3			C		NC	C
Bridgestone Americas Tube	3011		Y	11/1/2021	N	1	1			C		C	C
ConAgra Foods	2038		Y	7/1/2022	N	1	1			NA(1)		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			NA(1)		C	C
International Paper-Sheet Feeder	2653		Y	12/7/2021	N	1	1			NA(1)		C	NC
MAHLE	3714		Y	8/1/2021	N	1	1			C		NC	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			NA(1)		NC	NC
Rockline	2676		Y	12/1/2021	N	1	1			NA(1)		C	C
Sugar Creek Foods	2024		Y	12/14/2021	N	1	1			NA(1)		C	C

Taber Extrusions	3354	467.35	Y	12/1/2021	N	1	1				C	C	NC
Tyson River Valley Hatchery	0254		Y	12/14/2021	N	1	1				NA (1)	C	C
Tyson Tyler Road	2653		Y	6/1/2020	N	1	1				NA (1)	C	C

Include NAICS code (s)  
 3<sup>rd</sup> column - include the CFR # only if the Category has Pretreatment Standards (numeric or narrative)  
 Please footnote N/A reason

Footnote:

(1) Industry monitors monthly



**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

City Russellville State/Zip Arkansas / 72811

Contact Person Greg Kremers Position Wastewater & Pretreatment Operations Dir.

Contact Telephone 479-968-2080 Ext 236 NPDES Permit Nos. AR0021768

Reporting Period January 1, 2022 December 31, 2022  
 (Beginning Month, day and Year) (Ending Month, day and Year)

Total Number of Categorical IUs 4

Total Number of Significant Noncategorical IUs 11

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>4/4</u>	<u>11 /11</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 /4</u>	<u>1 /11</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical) . . . . .	<u>7%</u>	



III. Compliance Monitoring Program

	SIGNIFICANT INDUSTRIAL USERS	
	<u>Categorical</u>	<u>NonCategorical</u>
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>12 / 11</u>
3) No. of Sampling Visits Conducted / Total No. Required. . . . .	<u>6 / 4</u>	<u>13 / 11</u>
4) No. of Facilities Inspected (nonsampling) / Total No. Required. . . . .	<u>4 / 4</u>	<u>12 / 11</u>
5) No. of Facilities Sampled / Total No. Required. . . . .	<u>4 / 4</u>	<u>11 / 11</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>3</u>	<u>11</u>
3) No. of Administrative Orders Issued to SIUs	<u>0</u>	<u>1</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>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.

Gray Kremer

Authorized Representative

Date 2/17/2023

# PROOF OF PUBLICATION

STATE OF ARKANSAS  
COUNTY OF POPE

} SS:

## INDUSTRIAL PRETREATMENT PROGRAM SIGNIFICANT NONCOMPLIANCE 2022 ANNUAL REPORT

City Corporation, as the operating agency of the Russellville Water & Sewer System, is required by NPDES Permit No. AR0021788, 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 2022 pretreatment reporting year:

PREMIUM PROTEIN PRODUCTS, Permit No. WDP 2006  
Chronic Violation for Ammonia discharge limitation  
40 CFR 403.8 (f)(2)(viii)(A)

TABER EXTRUSIONS, LLC, Permit No. WDP 2005  
Technical Review Criteria violation for Zinc discharge limitation  
40 CFR 403.8 (2)(viii)(B)

Inquiries into the above information can be made to:

Chief Executive Officer  
City Corporation  
Post Office Box 3186

Russellville, Arkansas 72811

Business hours are 8:00 a.m. to 4:30 p.m., Monday through Friday.  
Steve Mallett, Chief Executive Officer

This legal published in The Courier on February 4, 2023.

I, Judy Manning, of The Courier, 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 4, 2023.

Industrial Pretreatment Program

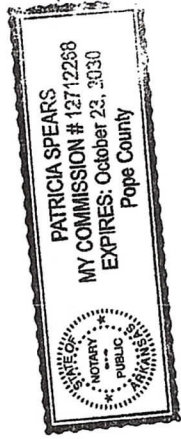
Ad# 705040785

Printer's Fee \$ 70.00

Subscribed and sworn to before the undersigned, this 0

day of February, 2023.

My commission expires October 23, 2030.



Patricia Spears  
Notary Public

**Correction Printed in the February 11, 2023**

**Edition of The Courier**

**Classified Desk: 479-968-5252**

**Fax: 479-967-9361**

**Email: class1@couriernews.com**

**Hours: Monday - Friday 8am-3pm CST**

**0100**

**ANNOUNCEMENTS**

**0100**

Correction In the February 4, 2023, edition of The Courier, City Corporation incorrectly reported that Taber Extrusions, LLC was found to be in significant noncompliance for the 2022 pretreatment reporting year. After discovery of a data collection error, it was found that Taber Extrusions, LLC did not meet the definition of significant noncompliance as defined by 40 CFR 403.8(f)(2)(viii)(B). City Corporation apologizes for the error.

**DIRECT**  
months v  
Watch yc  
news & er  
First 3 i  
Cinemax  
Epix inc  
Cust  
(JD  
Some  
Call

**DONA**  
**TRUCK**