



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

February 22, 2022

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 2021 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, looped initial "G".

Greg Kremers
Pretreatment Coordinator
P.O. Box 3186
Russellville, AR 72811-3186
Phone 479.968.2080 Ext. 236
gkremers@citycorporation.com

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: January 1, 2021 TO December 31, 2021
TREATMENT PLANT: Russellville City Corporation NPDES PERMIT #AR0021768
AVERAGE POTW FLOW: 5.34 MGD % IU FLOW: 23.7 %

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)
		1/12/21	4/13/21	8/2/21	10/5/21		1/13/21	4/14/21	8/3/21	10/6/21			
Arsenic	N/A	< 60	< 60	< 60	< 60	N/A	< 60	< 60	< 60	< 60	60	EPA 200.8	60
Cadmium	4.7	< 0.5	< 0.5	< 0.5	< 0.5	1.84	< 0.5	< 0.5	< 0.5	< 0.5	0.5	EPA 200.8	0.5
Copper	3.4	15	26	41	40	9.24	3.6	4.9	5.3	5.4	0.5	EPA 200.8	0.5
Lead	15.9	1.0	1.3	1.8	1.1	2.71	0.79	< 0.5	< 0.5	< 0.5	0.5	EPA 200.8	0.5
Mercury	0.1	0.022	0.063	0.024	0.019	5.8	0.0040	0.0029	0.0014	< 0.0005	0.005	EPA 1631E	0.0005
Nickel	47.5	11	8.2	8.8	8.1	96.96	4.5	4.9	4.4	3.4	0.5	EPA 200.8	0.5
Selenium	7.5	< 5	< 5	< 5	< 5	5.58	< 5	< 5	< 5	< 5	5	EPA 200.8	5
Silver	5.2	< 0.5	< 0.5	< 0.5	< 0.5	0.93	< 0.5	< 0.5	< 0.5	< 0.5	0.5	EPA 200.8	0.5
Zinc	194.4	110	110	320	130	85.53	25	25	81	71	20	EPA 200.8	20
Chromium	100	49	17	24	< 10	11.81	< 10	< 10	< 10	< 10	10	EPA 200.8	10
Cyanide	18.7	< 10	< 10	< 10	< 10	N/A	< 10	< 10	< 10	< 10	10	SM 4500-CN CE 2011	10
Arsenic	5.1	3.9	20	17	49	348.96	5.0	4.8	3.3	3.6	0.5	EPA 200.8	0.5
Molybdenum	5.6	< 10	20	< 10	< 10	N/A	< 10	< 10	< 10	< 10	--	EPA 200.8	10
Phenols	N/A	57	190	170	60	N/A	10	< 5	< 5	< 5	5	EPA 420.1	5
Beryllium	11.8	< 0.5	< 0.5	< 0.5	< 0.5	3.82	< 0.5	< 0.5	< 0.5	< 0.5	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	0.5	EPA 200.8	0.5
Flow, MGD	N/A	7.880	6.913	3.382	4.329	N/A	6.077	6.256	3.919	3.980	N/A	Totalizer	N/A
(3) Chloroform		2.5					< 2.0					EPA 624.1	2

(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, 2021 through December 31, 2021

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: 1

Current compliance status: Compliant

Other: Notice of violation issued for late submittal of self-monitoring flow report (Jan. 2021)

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

Current compliance status: Compliant

Other: No issues of non-compliance incurred during the 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: Not in compliance

Other: POM was issued a notice of violation on July 15, 2021 for late submittal of January-June 2021 semi-annual report.

Notice of violation was issued on January 24, 2022 for late submittal of July-December 2021 semi-annual report.

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 and monthly average for oil and grease (Nov.). The reason for exceedance was corrected and Taber is currently in compliance with its permit.

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: Notice of violation issued for late submittal of self-monitoring flow report (Jan. 2021). Issue was corrected.

Name of Industry: **ConAgra Foods**

SIC Code: 2038

Categorical: No

Control Document: Yes

Effective date: 5/30/2017

Times inspected: 1

Times sampled: 82

Current compliance status: Compliant

Other: Notice of violation issued on May 12, 2021 for plant upset and on November 17, 2021 for the bypass of wastewater. Corrective Action Plan submitted and approved for both incidents. ConAgra is currently in compliance.

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 2021 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 incurred during the 2021 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: No issues of non-compliance incurred during the 2021 reporting year.

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 February 9, 2021 for high pH (> 12 s.u.) slug discharge and on July 7, 2021 for late submission of January – June semiannual report. Issues were corrected and facility is currently in compliance with its permit.

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

SIC Code: 2077

Categorical: No

Control Document: Yes

Effective date: 11/1/2021

Times inspected: 1

Times sampled: 2

Current compliance status: Not in compliance

Other: Premium Protein is in significant non-compliance (chronic) for the reporting year for the exceedance of NH3-N.

Name of Industry: **Rockline Industries**

SIC Code: 2676

Categorical: No

Control Document: Yes

Effective date: 12/1/2021

Times inspected: 1 (Prior to issuance of permit)

Times sampled: 1 (Prior to issuance of permit)

Current compliance status: Compliant

Other: Rockline Industries is a newly identified industry that was categorized as an SIU during the 2021 reporting year. The facility was inspected and sampled in 2021 prior to receiving a permit and is not included in the Pretreatment Performance Summary, Part III.2-5. Effective date of permit was December 1, 2021.

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 2021 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 2021 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 2021 reporting year.

Name of Industry: **Waste Management - Ozark Ridge Landfill**

SIC Code: 4953

Categorical: No

Control Document: Yes

Effective date: 9/1/2018

Times inspected: 1 (Inspection to verify no treatment unit)

Times sampled: No discharge

Current compliance status: Expired

Other: Permit was for the disposal of hauled landfill leachate. No leachate was ever brought to the POTW. Permit expired on 12/31/2021 and was not renewed.

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	Self Monitoring	
Aqua Contour Cutting	3499	433.15	Y	1/1/2022	N	1	1		C	NC	C	
Bridgestone Americas Tube	3011		Y	11/1/2021	N	1	1		C	NC	C	
ConAgra Foods	2038		Y	5/30/2017	N	1	82		C	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		C	C	C	
International Paper-Sheet Feeder	2653		Y	12/7/2021	N	1	1		C	C	C	
MAHE	3714		Y	8/1/2021	N	1	1		NC	C	C	
P.O.M.	3999	433.15	Y	12/14/2021	N	1	1		NC	C	C	
Premum Protein Products	2077		Y	11/1/2021	N	1	2		C	C	NC	
Rockline	2676		Y	12/1/2021	Y	N/A (1)	N/A (1)		C	C	C	
Sugar Creek Foods	2024		Y	12/14/2021	N	1	1		C	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			C	C	C
Tyson Tyler Road	2653		Y	6/1/2020	N	1	1			C	C	C
Waste Management - Ozark Ridge	4953		Y	9/1/2018	N	1	N/A (2)			C	C	N/A (2)

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

Footnote:
 (1) Rockline Industries is a newly designated SIU with a permit effective date of December 1, 2021. The Facility was inspected and sampled by the City Corporation prior to the issuance of the permit. Rockline's status report is based off of one month of reporting (December 2021).

(2) No leachate was discharged to the POTW during the reporting year, so no sampling was conducted by the permittee or City Corporation.

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 Pretreatment Coordinator

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

Reporting Period January 1, 2021 December 31, 2021
 (Beginning Month, day and Year) (Ending Month, day and Year)

Total Number of Categorical IUs 4

Total Number of Significant Noncategorical IUs 12

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>12 /12</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 /12</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical) . .	<u>6%</u>	

III. Compliance Monitoring Program

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued / Total No. Required.	<u>4 / 4</u>	<u>12 / 12</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>4 / 4</u>	<u>92 / 10</u>
4) No. of Facilities Inspected (nonsampling) / Total No. Required.	<u>4 / 4</u>	<u>11 / 11</u>
5) No. of Facilities Sampled / Total No. Required.	<u>4 / 4</u>	<u>10 / 10</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<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>4</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>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.

Grey Kremer

Authorized Representative

Date 2/22/2022

PROOF OF PUBLICATION

STATE OF ARKANSAS }
COUNTY OF POPE } SS:

INDUSTRIAL PRETREATMENT PROGRAM SIGNIFICANT NONCOMPLIANCE 2021 ANNUAL REPORT

City Corporation, as the operating agency of the Russellville Water & Sewer System, is required by NPDES Permit No. AR0021768, 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 user was found to be in significant noncompliance for the 2021 pretreatment reporting year:

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

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 publication in The Courier on February 12, 2022.

I, Yudel Morrongy
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 12, 2022.

Industrial Pretreatment

PO# 70888875

Printer's Fee \$ 1010.00

Subscribed and sworn to before the undersigned, this 15
day of February, 2022.

My commission expires October 23, 2030.

Patricia Spears
Notary Public

