

Torrence, Rufus

From: Torrence, Rufus
Sent: Wednesday, March 10, 2010 3:34 PM
To: RBradley@citycorporation.com
Subject: AFIN 58-00105 AR0021768 City of Russellville 2009 Annual Report

ADEQ

ARKANSAS
 Department of Environmental Quality

March 10, 2010

Craig Noble, General Manager
 City Corporation
 Russellville Water and Sewer System
 P O Box 3186
 Russellville, Arkansas 72811-3186

Re: City of Russellville 2009 Annual Pretreatment Report
 (Permit No. AR0021768, AFIN 58)

Dear Mr. Noble:

The Department has reviewed the City's 2009 Annual Pretreatment Report and the report is complete. However, the Department has some concerns and offers some recommendations to improve the City's reporting.

1. Referring to Allen Gilliam's email (attached), please list "non-detects" as "zero" for both influent and effluent values.
2. City Corporation's NPDES permit has limits for Zinc (86 µg/l) and Copper (9.24 µg/l). Nonetheless, in accordance with paragraph 4, Toxic Pollutants (page 2 of Part II), City Corporation "*shall comply with effluent standards...under Regulation No. 2 (Arkansas Water Quality Standards)...even if the permit has not yet been modified to incorporate the requirement*". Therefore, City Corporation must comply with the following Water Quality Standards (WQS):

Cadmium	1.84 µg/l
Copper	9.24 µg/l
Lead	2.71 µg/l
Mercury	0.013 µg/l
Nickel	97.0 µg/l
Selenium	5.58 µg/l
Silver	0.93 µg/l
Zinc	86.0 µg/l
Chromium	295.0 µg/l
Cyanide	5.8 µg/l

3. Please refer to the Department's letter dated April 3, 2009 (attached) to review the criteria which the Department used to derive the WQS.
4. Please note that City Corporation did not list the correct Maximum Allowable Headworks Concentrations (MAHC) or the correct WQS on the influent/effluent chart. Please use the attached chart to report future data.

The Department appreciates the City's continued efforts in annual reporting. 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,

A handwritten signature in black ink, appearing to read "Rufus Torrence". The signature is written in a cursive style with a large initial "R".

Rufus Torrence, Pretreatment Engineer
Water Division



CITY CORPORATION

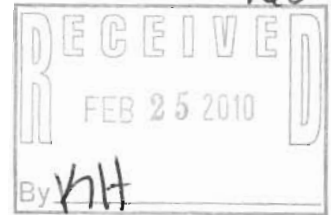
Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186

Phone (479) 968-2105
FAX (479) 968-3265

February 22, 2010

Rufus Torrence
NPDES Pretreatment Engineer & Auditor
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317



Re: Annual Pretreatment Program Status Report
NPDES Permit: AR0021768, AFIN: 58-00105

Mr. Torrence:

Enclosed is the City Corporation Pretreatment Program Status Report for the year ending December 31, 2009.

If you have any questions about this report, please contact Randy Bradley, Pretreatment Coordinator, at (479) 968-2080 ext 133.

Respectfully,

A handwritten signature in black ink, appearing to read 'Craig Noble'.

Craig Noble
General Manager

Encl

cc: Randy Bradley
Larry Collins

LEGAL NOTICES

PROOF OF PUBLICATION

INDUSTRIAL PRETREATMENT PROGRAM SIGNIFICANT NONCOMPLIANCE

2009 ANNUAL REPORT

incorporation, as the operating agency of the Russellville Water & Sewer System, is required by Permit No. AR0021768, Part III, 7.D. to "prepare annually a list of industrial users which the preceding twelve months were in significant noncompliance with applicable pretreatment standards." The following permitted industrial users were found to be in significant noncompliance for the 2009 pretreatment reporting year:

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

TABER EXTRUSION-LIMITED PARTNERSHIP, Permit No. WDP 2005
Chronic Violation of wastewater discharge limits for Zinc
CFR 403.8 (f) (2) (viii) (A)

POM, Inc., Permit No. WDP 2013
Technical Review Criteria, violation for Zinc discharge limitations.
CFR 403.8 (f) (2) (viii) (B)

Based on 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.

Notary Public
Notary Manager

Notarially published in The Courier on February 14, 2010.

STATE OF ARKANSAS
COUNTY OF POPE

} SS:

I, Kelly Davis
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

2-14, 2010

2009 Annual Report

Printer's Fee \$ 130.00

Subscribed and sworn to before the undersigned, this 17th

day of February, 2010

My commission expires 10-01, 2010



Sheila Porter
Notary Public

Torrence, Rufus

From: Gilliam, Allen
Sent: Wednesday, January 14, 2009 1:44 PM
To: Fuller, Kim; Torrence, Rufus; Bailey, John
Subject: inf/eff "ND" reporting

Does the below parallel with what's in our CPP and what our permit writers may be expected to do? Comments PLEASE before I send this out.

Thx, Allen g

Dear Pretreatment Professionals:

As previously mentioned, this guidance is submitted with some explanation and examples (see attached) of reporting your effluent results (for your influent values, you may place whatever numbers or "ND" your lab may supply you. Hopefully you are also using the same methods as the used for the effluent samples for more accurate removal efficiencies.).

Our NPDES permit writers have the option to use your effluent values in calculating your "reasonable potential to exceed WQ criteria".

The below footnoted #s are denoted in red with the examples on the attached:

- 1) If you have a detectable level of an analyte, obviously report that number (in ug/l)
- 2) If you have a non-detect value AT or BELOW the EPA required MQL, you may report "0".
- 3) If you have a non-detect value ABOVE the EPA required MQL, please report "ND*" with that asterisk denoting at what MQL the analyte was not detected at.

Keep in mind if your lab cannot achieve the required MQL and you report "ND*", an NPDES permit writer may take this "ND*" at its numeric value in calculating your reasonable potential for exceeding a WQ criteria. It is in your best interest to achieve these MQLs especially if you are discharging into an intermittent stream as the WQ criteria will be applicable at the "end of pipe" of your outfall (the most stringent case).

See attachment for examples. Questions? Please feel free to contact this office with any questions or comments,

Thank you for your cooperation,

Allen Gilliam
State Pretreatment Coordinator
501.682.0625

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: January 1, 2009 TO December 31, 2009
TREATMENT PLANT: City Corporation NPDES PERMIT #AR0021768
AVERAGE POTW FLOW: 6.384 MGD % IU FLOW: 17.2%

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)
		1/14/09	4/06/09	7/21/09	10/21/09		1/15/09	4/07/09	7/22/09	10/23/08			
Antimony	N/A	<60	<60	<60	<60	N/A	<60	<60	<60	<60	60	200.8	60
Cadmium	6.78	<0.5	<0.5	<0.5	<0.5	11.84	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Copper	306.36	28.0	56.0	47	18	9.24	10	71	17	8.4	0.5	200.8	0.5
Lead	73.58	2.3	5.2	6.1	1.6	2.71	0.76	4.4	<0.5	0.65	0.5	200.8	0.5
Mercury	0.57	<.0018	0.0091	<.0018	0.150	0.23	0.028	0.032	0.012	0.014	.005	245.7	0.0018
Nickel	53.43	7.4	<10.0	13	23.0	8488.0	7.2	7.1	8.2	4.4	0.5	200.8	0.5
Selenium	10.69	<5	<5	<5	<5	85.8	<5	<5	<5	<5	5	200.8	5
Silver	250.0	3.2	<0.5	3.1	4.9	70.3	0.79	1.1	<0.5	<0.5	0.5	200.8	0.5
Zinc	488.73	110	190	240	80	2094.9	46	190	28	30	20	200.8	20
Chromium	195.49	10	<10	31	<10	14024.4	<10	<10	<10	<10	10	200.8	10
Cyanide	100	<10	<10	<10	<10	5.59	<10	<10	<10	<10	10	SM4500	10
Arsenic	8.91	<0.5	5.5	2.2	0.99	2943.8	<0.5	1.8	0.87	<0.5	0.5	200.8	0.5
Molybdenum	8.02	<8	8.3	<8	<8	N/A	<8	<8	<8	<8	--	200.8	8
Phenols	N/A	<5	110	<5	25	N/A	11	14	<5	<5	5	420.1	5
Beryllium	100.0	<0.5	<0.5	<0.5	<0.5	106.968	<0.5	<0.5	<0.5	<0.5	0.5	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	200.8	0.5
Flow, MGD	N/A	5.676	6.403	4.155	6.517	N/A	5.456	6.447	6.251	10.017			
(3)													
Bis(2-ethylhexyl)phthalate		29										625	2.9
Chlorpyrifos								0.067				608	0.05

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	Self Monitoring	
Con Agra Foods	2038		Y	1Apr07	N	2	2		C	C	C	C
MAHLE	3714		Y	1Apr07	N	2	2		C	C	C	C
Sugar Creek Foods, International	2024		Y	1Aug07	N	2	2		C	C	C	SNC/BOD
Firestone	3011		Y	1Apr07	N	2	2		C	C	C	C
International Paper	2653		Y	1Apr07	N	2	2		C	C	C	C
Hackney Ladish	3462		Y	1Apr07	N	2	2		C	C	C	C
POM, Inc.	3999	433.15	Y	1Apr07	N	2	2		C	C	C	SNC / zinc
Premium Protein Products	2077		Y	1Apr07	N	2	2		C	C	C	C
Taber Extrusions	3354	467.35	Y	1July07	N	2	2		C	C	C	SNC / O&G, zinc
Tyson Foods, RVH	0254		Y	1Apr07	N	2	2		C	C	C	C
Tyson Foods, Tyler Road	2017		Y	1Apr07	N	2	2		C	C	C	C
International Paper, 16 th St.	2653		Y	1Sep08	N	2	2		C	C	C	NC / TSS
Grace Manufacturing	3423	433.15	Y	1Jun07	N	2	2		C	C	C	C

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 2009 December 2009
 (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>2/3</u>	<u>1/10</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .	<u>3/13</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>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>20/20</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 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>2</u>	<u>2</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>2</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 February 22, 2010

PPS Program Report

* NPDES ID: AR0021760

Permittee's Name Kussellville

* Report Received/Event Date: 02/25/2010

Date 2-23-2010

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

Report Information

* Pretreatment Performance Summary Start Date: 01/01/2009

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: 3

SIUs in SNC with Reporting Requirements: 3

SIUs in SNC with Pretreatment Schedule: 0

SIUs in SNC Published in Newspaper: 3

SIUs Schedules: 0

Violation Notices Issued to SIUs: 4

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: 2

Penalties

Dollar Amount of Penalties Collected: \$ 0

Industrial Users (IUs) from which Penalties have been collected: 0

Other Information

SUO Reference: 1388

SUO Date: 03/10/1992

Annual Pretreatment Budget: \$ 0

Pass-Through/Interference Indicator: No

Notification of IU Schedule for Remedial Measures: No

Initial Response to Violation of IU Schedule for Remedial Measures: No

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits: 01/19/2010

Date of Most Recent Adoption of Technically Based Local Limits: 03/10/1992

Local Limit Pollutants: As, Cd, Cr, Cu, CN, Pb, Hg, Ni, Ag, B.

Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval: 0

Removal Credits: 0

Acceptance of Waste

Acceptance of Hazardous Waste: NPY

Acceptance of Non-Hazardous Industrial Waste: NPY

Acceptance of Hauled Domestic Wastes: NPY

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: 4

Annual Frequency of Effluent Toxicant Sampling: 4

Annual Frequency of Sludge Toxicant Sampling: 4