



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 23, 2006

Lorraine Steward
Enforcement Assistant
Arkansas Department of Environmental Quality
Post Office Box 8913
Little Rock, Arkansas 72219-8913



Re: Annual Pretreatment Program Status Report

Dear Ms. Steward:

Enclosed is the City Corporation Pretreatment Program Status Report for the year ending December 31, 2005. We have reissued permits to eleven (11) of the thirteen (13) permitted industries due to their permits expiring. As of date of this letter we have not reissued the permit to Con Agra, but will reissue their permit by the end of March 2006.

You will notice on our Monitoring Results for the third quarter we have entered more than one date. We collected more samples this quarter due to the influent sampler being moved. We determined that the sampler was located in our system where the stream being sampled was not a true sample of our influent. Per your request the sampler was moved and a series of influent samples were collected and analyzed to better determine our influent loading. The results that are reported for this quarter are an average of all seven (7) samples taken during this period.

City Corporation is also undergoing review of our local limits, changes in our User Fee and Rate Ordinance, and a complete update of our Approved Pretreatment Program. All of which will be forwarded to your office for approval as soon as these changes have been finalized.

Enclosed are reports of upsets to the POTW suspected to be caused by industrial contributors as required in Part III, paragraph D (3) of our permit, AR0021768.

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

Respectfully,

City Corporation

A handwritten signature in black ink, appearing to read "Craig Noble". The signature is written in a cursive style with a large initial "C" and "N".

Craig Noble
General Manager

Encl

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: January 1 2005 TO December 31, 2005

TREATMENT PLANT : City of Russellville

NPDES PERMIT #AR0021768

AVERAGE POTW FLOW: 5.1MGD % IU FLOW: 20.2%

| METALS, CYANIDE and PHENOLS (Total) | MAHL mg/l (2) | Influent Dates Sampled (mg/l) Once/quarter | | | | WQ level/ limit mg/l (2) | Effluent Dates Sampled (mg/l) Once/quarter | | | | Laboratory Analysis (See Attachment PPS) | |
|--|---------------------|--|-------------|---|-------------|--------------------------------------|--|-------------|-------------|-------------|--|--|
| | | 1/19/0 5 | 4/19/0 5 | 8/9/05 8/22 - 8/26 8/29/0 5 | 10/6/0 5 | | 1/20/0 5 | 4/20/ 05 | 8/10/ 05 | 10/7/ 05 | EPA Method Used (1) | Detection Level Achieved (ug/l) |
| Antimony | N/A | 0.0 | <0.03 | <0.03 | <0.03 | N/A | <0.01 | <0.03 | <0.03 | <0.03 | 200.7 | 10.0 |
| Cadmium | | 0.0 | <0.004 | <0.004 | <0.004 | | <0.005 | <0.004 | <0.004 | <0.004 | 200.7 | 1.0 |
| Copper | | 0.034 | 0.12 | 0.0687 | 0.011 | | <0.02 | <0.006 | .013 | <0.006 | 200.7 | 10.0 |
| Lead | | 0.0 | <0.04 | <0.04 | <0.04 | | <0.005 | <0.04 | <0.04 | <0.04 | 200.7 | 5.0 |
| Mercury | | .00045 | .0019 | 0.0003 | <.0002 | | <0.0002 | <.0002 | <.0002 | <.0002 | 245.1 | 0.2 |
| Nickel | | 0.0 | 0.017 | 0.008 | 0.011 | | <0.02 | <0.01 | <0.01 | <0.01 | 200.7 | 10.0 |
| Selenium | | 0.0 | 0.0025 | <0.07 | <0.07 | | <0.02 | <0.07 | <0.07 | <0.07 | 200.7 | 70.0 |
| Silver | | 0.0 | 0.014 | 0.0046 | 0.0077 | | <0.01 | <0.007 | <0.007 | <0.007 | 200.7 | 7.0 |
| Zinc | | 0.12 | 0.8 | 0.383 | 0.28 | | 0.03 | 0.024 | 0.042 | 0.032 | 200.7 | 20.0 |
| Chromium | | 0.015 | 0.045 | 0.0299 | 0.011 | | <0.01 | <0.007 | <0.007 | <0.007 | 200.7 | 7.0 |
| Cyanide | | 0.0 | <0.01 | 0.0 | <0.01 | | 0.005 | 0.014 | <0.01 | <0.01 | 335.2 | 10.0 |
| Arsenic | | 0.0 | <0.001 | 0.0 | <0.05 | N/A | <0.02 | <0.05 | <0.05 | <0.05 | 200.7 | 50.0 |
| Molybdenum | | .0055 | 0.022 | 0.018 | 0.016 | N/A | 0.004 | <0.008 | 0.014 | 0.019 | 200.7 | 8.0 |
| Phenols | N/A | 0.04 | 0.039 | 0.029 | 0.040 | N/A | <0.04 | <0.005 | <0.005 | 0.02 | 420.1 | 5.0 |
| Beryllium | N/A | 0.0 | <.0003 | <.0003 | <0.0003 | N/A | <0.002 | <.0003 | <.0003 | <.0003 | 200.7 | 0.3 |
| Thallium | N/A | 0.0 | <0.04 | <0.04 | <0.04 | N/A | <0.02 | <0.04 | <0.04 | <0.04 | 200.7 | 40.0 |
| Flow, MGD | N/A | 7.64 | 6.99 | 6.22 | 5.98 | N/A | 6.577 | 5.911 | 4.357 | 4.201 | | |
| (3) | | | | | | | | | | | | |
| Bromodichloromethane | | | | | | | 0.0024 | | | | 624 | 1.0 |
| Bis(2-ethylhexyl) Phthalate | | | | | | | 0.016 | | | | 624 | 10.0 |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |

- (1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs should be used so that the data can also be used for Local Limits assessment and NPDES application purpose.**
- (2) This value was calculated during the development of TBLL based on State WQ Standards and implementation procedures.
- (3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity in which they were detected.

MAHL - Maximum Allowable Headworks Level

WQ - Water Quality

ATTACHMENT A
PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

| Industrial User | SIC Code | Categorical Determination | Control Document | | New User | Times Inspected | Times Sampled | Compliance Status | | | Permit Limits | |
|--------------------------|----------|---------------------------|------------------|-------------|----------|-----------------|---------------|-------------------|-------------------|-------------|---------------|---------------------|
| | | | Y/N | Last Action | | | | BMR | 90-day Compliance | Semi Annual | | Self Monitoring |
| Con Agra | 2038 | | N | 1 Nov00 | N | 2 | 2 | | | C | C | C |
| Dana Corporation | 3714 | | Y | 23Feb06 | N | 2 | 2 | | | C | C | C |
| Eskimo Pie Foods | 2024 | | Y | 23Feb06 | N | 2 | 2 | | | C | C | SNC / BOD |
| Firestone | 3011 | | Y | 23Feb06 | N | 2 | 2 | | | C | C | C |
| International Paper | 2653 | | Y | 23Feb06 | N | 2 | 2 | | | C | C | C |
| Trinity | 3462 | | Y | 23Feb06 | N | 2 | 2 | | | C | C | C |
| POM, Inc. | 3999 | 40CFR 433.15 | Y | 23Feb06 | N | 2 | 2 | | | NC | NC | SNC / Report |
| Premium Protein Products | 2077 | | Y | 23Feb06 | N | 2 | 2 | | | C | C | NC / pH NH3N TSS |
| Taber Extrusions | 3354 | 40CFR 467 | Y | 23Feb06 | N | 2 | 2 | | | C | C | SNC / O&G |
| Tyson Foods, RVH | 0254 | | Y | 23Feb06 | N | 2 | 2 | | | C | C | C |
| Tyson Foods, Tyler Road | 2017 | | Y | 23Feb06 | N | 2 | 2 | | | C | C | NC / pH BOD |
| Weyerhaeuser | 2653 | | Y | 23Feb06 | N | 2 | 2 | | | C | C | NC / TSS pH |
| Grace Manufacturing | 3423 | 40CFR 433.15 | Y | 20Oct04 | 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 THE EPA. 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 AR 72811-3186

Contact Person Randy Bradley Position Pretreatment Coordinator

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

Reporting Period January 2005 _____ December 2005 _____
 (Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 3

Total Number of Significant Noncategorical IUs 10

II. Significant Industrial User Compliance

| | SIGNIFICANT INDUSTRIAL USERS | |
|--|------------------------------|-----------------------|
| | <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>2/10</u> |
| 6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . . | | <u>4/13</u> |

III. Compliance Monitoring Program

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

| | | |
|--|--------------|--------------|
| 1) No. of Control Documents Issued/Total No. Required. | <u>3 / 3</u> | <u>9/10</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

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

| | | |
|---|-------------|--------------------|
| 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>17</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>2</u> |
| 7) Amount of Penalties Collected (total dollars/IUs assessed) | <u>0/ 0</u> | <u>11,191.37/3</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.

C. Nell
 Authorized Representative

March 1, 2006
 Date

INDUSTRIAL PRETREATMENT PROGRAM

SIGNIFICANT NONCOMPLIANCE

2005 ANNUAL REPORT

City Corporation, as the operating agency of the Russellville Water & Sewer System is required by NPDES Permit No. AR0021768, Part III, 7. D. to "prepare annually a list of industrial user 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 noncompliance for the 2005 pretreatment reporting year:

ESKIMO PIE FOOD SERVICE, LLC, Permit No. WDP 2000 Chronic Violations of BOD discharge limitations. CFR 403.8 (F)(2)(vi)(A)

TYSON FOODS INC. TYLER ROAD PLANT Technical Review Criteria violation for BOD discharge limitations. CFR 403.8 (F)(2)(vi)(B)

TABER EXTRUSIONS-LIMITED PARTNERSHIP Chronic Violations of Oil & Grease discharge limitations. CFR 403.8 (F)(2)(vi)(A)

P.O.M. INC.

Failure to provide, within 30 days after the due date, required self-monitoring report CFR 403.8 (F)(2)(vi)(F)

Inquiries into the above information can be made to:

General Manager
City Corporation
Post Office Box 3186
Russellville, Arkansas 72811

Business hours are 8:00 a.m. to 4:30 p.m., Monday through Friday.

Craig Noble
General Manager

This legal was published in The Courier on February 12, 2006.

PROOF OF PUBLICATION

STATE OF ARKANSAS
COUNTY OF POPE

SS:

I, Sheila Porter
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, 2006
2005 Annual Report, Significant Noncompliance.

Printer's Fee \$ 110.24

Subscribed and sworn to before the undersigned, this 12th

day of February, 2006

My commission expires October 1, 2010



Sheila Porter
Notary Public

CODE SHEET

Annual Report

| | | <u>CODE</u> |
|-------------------------------|------------------|-------------|
| Auditor's Name | <u>Gilliam</u> | |
| Permit Number | <u>AR0021768</u> | |
| Period Report Covers End Date | <u>12/31/05</u> | PSED |
| Start Date | <u>1/1/05</u> | PSSD |

PPETS WENDB DATA ELEMENTS

| | | |
|--|-----------|------|
| Significant IUs in Significant Noncompliance with Pretreatment Compliance Schedule | <u>0</u> | SSNC |
| NOV's and A.O.'s Issued Against Significant IUs | <u>20</u> | FENF |
| Civil and/or Criminal Judicial Actions Against Significant IUs | <u>0</u> | JUDI |
| Significant IUs with Significant Violations published in Newspaper | <u>4</u> | SVPU |
| IUs from which penalties have been collected | <u>3</u> | IUPN |

COMMENTS:
