

## Gage, Hannah

---

**From:** Gilliam, Allen  
**Sent:** Wednesday, March 30, 2016 2:30 PM  
**To:** russellville randy bradley  
**Cc:** Gage, Hannah; McWilliams, Clark  
**Subject:** AR0021768\_Russellville Feb 2016 annual Pretreatment Program report response\_20160330  
**Attachments:** Russellville's Feb 2016 annual Pretreatment Program report response.pdf

Randy,

Your response to this office's March 10<sup>th</sup> e-request for an explanation of Russellville City Corp's high industry significant non-compliance (SNC) rate was received (attached).

Your approved Pretreatment Program's enforcement response plan's (ERP) guide should be followed more strictly to bring violating industries back into compliance in a timely fashion.

Your suggested "fixes" may help these industries to understand why there are Pretreatment requirements expected of them, but they also need to understand there can be monetary fines imposed if repeat violations occur according to Russellville City Corp's ERP guide.

You may want to copy your industries on this guide allowing them the specific knowledge this is what City Corp is bound to follow according to their delegated Pretreatment Program.

This office expects to see zero Russellville City Corp industries in SNC on next year's annual report.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

BZBU9



# CITY CORPORATION

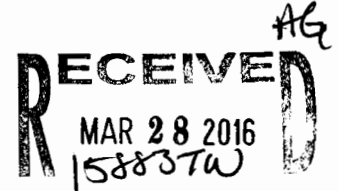
Russellville Water and Sewer System

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

Office (479) 968-2105  
Fax (479) 968-3265

March 17, 2016

Mr. Allen Gilliam  
ADEQ State Pretreatment Coordinator  
Arkansas Department of Environmental Quality  
5301 Northshore Dr.  
North Little Rock, Arkansas 72118



RE: AR0021768 Russellville Feb 2016 annual Pretreatment Program report

Dear Mr. Gilliam:

This letter is in response to your email dated March 3, 2016 requiring written correspondence on how the industries in the annual report became SNC. The following details each industry path to SNC:

1. Premium Protein Products: During the months January 2015 thru June 2016 3 of the 9 sampling events showed ammonia levels above the "Technical Review Criteria" limit of 210 mg/l. These 3 samples all occurred in January and February during a time when their pretreatment facilities were experiencing limited nutrient loading and wet and cold weather.
2. Taber Extrusions: During the months May 2015 thru October 2015 2 of the 6 sampling events showed Oil & Grease levels above the "Technical Review Criteria" limit of 42.6 mg/l.
3. Hackney Ladish, Inc.: This industry failed to submit a semi-annual report for the second half of 2015. I contacted the industry with instructions and they sent me a copy of the analytical report but failed to submit a complete semi-annual report with certification statement.
4. P.O.M.: The two sampling events during the second half of the year showed chromium levels about the permitted "Chronic violation of wastewater discharge limits" of 2.77 mg/l. One of the sampling events was City Corporation's control sampling and the results showed a chromium level of 7.2 mg/l. This industry was resampled by City Corporation staff and the results showed a chromium level of 0.57 mg/l.
5. Grace Manufacturing: During this reporting year (2015) Grace has experienced issue with the levels of chromium in their discharge. Both semi-annual reports showed chromium levels above the permitted monthly average limit of 1.71 mg/l.

In my efforts to correct these issues I will personally visit each industry, review with them the past year's events, give guidance on proper sampling, review of sample results and reporting requirements. I am confident with this training most if not all these issues can be corrected.

Should you have any questions or need other info please contact me at 479-968-2080 ext. 224.

Sincerely,

A handwritten signature in black ink that reads 'Randy Bradley'.

Randy Bradley  
Wastewater Operations Manager

cc: Steve Mallett  
Larry Collins  
File