

Gage, Hannah

From: Gilliam, Allen
Sent: Thursday, March 10, 2016 3:26 PM
To: 'Randy Bradley'
Cc: Larry Collins; Steve Mallett; Gage, Hannah; McWilliams, Clark; Kaelin, Cynthia; Ramsey, David
Subject: AR0021768_Russellville Feb 2016 annual Pretreatment Program report_20160310
Attachments: annual pretreatment report 2015.pdf; 2015 SNC pub.docx

Randy,

Russellville City Corporation's February 2016 annual Pretreatment Report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i).

Almost 40% of your industries being in SNC is not a good indication your enforcement activities are effective. Please respond in writing within ten (10) working days from the date on this correspondence how these industries became SNC.

Russellville's January 2015 Audit indicated most of your industries are only required to sample/report twice per year AND cited Russellville as being in reportable non-compliance for "Failure to enforce pretreatment standards...".

Twice per year sampling may put those industries at a disadvantage if only one of those two samples was in violation for exceedance of a permit limit [meeting the SNC criteria for Chronic violations per 40 CFR 403.8(f)(2)(viii)(A)]. It may be advisable to increase their sampling requirements to once/month.

Your report might indicate Russellville's enforcement options are not being sufficiently escalated per Russellville's Enforcement Response Plan to keep these industries from becoming SNC to begin with.

Per 40 CFR 403.12(g)(2), "If sampling performed by an Industrial User indicates a violation, the User shall notify the Control Authority within 24 hours of becoming aware of the violation. The User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within 30 days after becoming aware of the violation." Did the SNC industries comply with these regulatory provisions?

Thank you for attention to this matter,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Randy Bradley [<mailto:rbradley@citycorporation.com>]
Sent: Wednesday, February 24, 2016 2:23 PM
To: Gilliam, Allen
Cc: Larry Collins; Steve Mallett
Subject: annual report

Allen

Attached is the annual report, I also attached a copy of the paper ad that will run this Sunday. I will forward you the proof of pub once I receive. Thanks sir

Randy Bradley
Wastewater Operations Manager

City Corporation
Russellville Water & Sewer System
205 West Third Place
Russellville, AR 72811
Phone 479.968.2080 Ext. 224
Fax 479.968.3265



(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.

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				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	
Con Agra Foods	2038		Y	16Dec10	N	2	2			C	C	C
MAHLE	3714		Y	16Dec10	N	2	2			C	C	C
Sugar Creek Foods, International	2024		Y	16Dec10	N	2	2			C	C	NC/BOD
Bridgestone Tube	3011		Y	16Dec10	N	2	2			C	C	C
International Paper	2653		Y	16Dec10	N	2	2			C	C	C
Hackney Ladish	3462		Y	16Dec10	N	2	2			SNC	C	C
POM, Inc.	3999	433.15	Y	16Dec10	N	2	2			C	C	SNC/Cr
Premium Protein Products	2077		Y	16Dec10	N	2	2			C	C	SNC/NH3
Taber Extrusions	3354	467.35	Y	16Dec10	N	2	2			C	C	SNC/O&G
Tyson Foods, RVH	0254		Y	16Dec10	N	2	2			C	C	c
Tyson Foods,	2017		Y	16Dec10	N	2	2			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 WW Operations Manager

Contact Telephone 479-968-5797 NPDES Permit Nos. AR0021768

Reporting Period January 2015 December 2015

(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>9/10</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>3/3</u>	<u>2/10</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .		<u>5/13</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>3</u>	<u>3</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>3</u>	<u>2</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.

 Date 2-24-16
 Authorized Representative

INDUSTRIAL PRETREATMENT PROGRAM

SIGNIFICANT NONCOMPLIANCE

2015 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 users were found to be in significant noncompliance for the 2015 pretreatment reporting year:

HACKNEY LADISH, INC, Permit No. WDP 2014
Failure to submit self-monitoring report.
CFR 403.8 (F)(2)(viii)(F)

PREMIUM PROTEIN PRODUCTS, Permit No. WDP 2006
Technical Review Criteria violation for Ammonia discharge limitations.
CFR 403.8 (F)(2)(viii)(B)

TABER EXTRUSIONS, LLC
Technical Review Criteria violation for Oil & Grease discharge limitations
CFR 403.8 (F)(2)(viii)(B)

GRACE MANUFACTURING INC.
Chronic violation of wastewater discharge limitations for chromium
CFR 403.8 (F)(2)(viii)(A)

P.O.M. INC
Chronic violation of wastewater discharge limitations for chromium
CFR 403.8 (F)(2)(viii)(A)

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.

Steve Mallett
General Manager

Note: Please run one day only in the legal section. Send bill to City Corporation, P.O. Box 3186
Russellville, AR 72811 c/o Randy Bradley Thanks