

Wilson, Tabatha

From: Gilliam, Allen
Sent: Thursday, February 27, 2014 11:22 AM
To: russellville randy bradley
Cc: Fuller, Kim; Wilson, Tabatha; Uyeda, Craig; Anderson, Alan; Kaelin, Cynthia; Ramsey, David
Subject: AR0021768_Russellvilles Feb 2014 annual Pretreatment report with ADEQ reply_20140227
Attachments: scan0002.pdf; scan0001.pdf

Randy,

Russellville's February 2014 annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i). No further actions are deemed necessary at this time.

Regarding exceedances of your previously calculated Hg MAHCs, it appears the incorrect removal efficiency was used @ 60%. A more realistic Hg removal efficiency shown across the State is in the neighborhood of 90 - 95% which would increase your MAHC to ~0.13 ug/l. We can talk further about Russellville City Corporation's TBLL evaluation at a later date if desired.

Regardless, these MAHCs are for your "flagging" for potential further investigation of contributors and are of no regulatory value. Reviewing your Hg effluent values, as we discussed on the phone today, could mean something completely different as far as potential future permit limits.

Thank you for your timely report remaining in compliance with the Federal Pretreatment Regulations.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

-----Original Message-----

From: RBradley@citycorporation.com [<mailto:RBradley@citycorporation.com>]
Sent: Wednesday, February 26, 2014 12:39 PM
To: Gilliam, Allen
Subject: Annual report

Allen,

Attached is the annual report and hard copy will be coming your way by snail mail once I receive proof of publication from the news paper. Let me know if you need any other info and I am sure you will have questions.

Thanks

(See attached file: scan0002.pdf)(See attached file: scan0001.pdf)

Randy Bradley
City Corporation
Pretreatment Coordinator
479-968-2080 Ext. 244



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 26, 2014

Mr. Allen Gilliam
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: Russellville City Corporation Annual Pretreatment Report
AFIN 58-00105; NPDES Permit No. AR0021768

Dear Mr. Gilliam:

Enclosed is City Corporation's Annual Pretreatment Report as required by permit AR0021768. City Corporation's WWTP is currently under construction to address nitrate, TRC and TSS issues. During this construction time, lab staff is collecting system data needed for new local limits development. City Corporation will forward draft local limits development to your office for review once completed.

If you have any questions or need additional information please feel free to contact Randy Bradley, City Corporation's pretreatment coordinator at (479) 968-2080 ext. 133.

Sincerely,

RUSSELLVILLE CITY CORPORATION

A handwritten signature in blue ink that reads "Steve Mallett".

Steve Mallett
General Manager

Attachment: Annual Report

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: January 1, 2013 TO December 31, 2013
TREATMENT PLANT: City Corpotation NPDES PERMIT #AR0021768
AVERAGE POTW FLOW: 5.734 MGD % IU FLOW: 16.4 %

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)
		1/10/13	5/8/13	7/17/13	10/16/13		1/11/13	5/9/13	7/18/13	10/17/13			
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8	60
Cadmium	5.58	0	0	0	0	1.84	0	0	0	0	0.5	200.8	0.5
Copper	36.95	31.0	28.0	46.0	27.0	9.24	5.8	15.0	8.4	6.6	0.5	200.8	0.5
Lead	6.95	2.9	1.3	2.2	2.9	2.71	0	0.5	1.3	0.53	0.5	200.8	0.5
Mercury	0.03	0.038	0.11	0.12	0.058	0.013	0.007	0.011	0.0067	0.0	.005	245.7	0.0018
Nickel	53.43	20	17.0	60.0	5.4	97.0	5.5	11.0	14.0	5.1	0.5	200.8	0.5
Selenium	10.69	0	0	0	0	5.58	0	0	0	0	5	200.8	5
Silver	3.73	0	0	0	0	0.93	0.0	0	0	0	0.5	200.8	0.5
Zinc	475.17	88.0	78.0	190.0	99.0	86.0	21	29.0	66.0	41.0	20	200.8	20
Chromium	195.49	57	31.0	120.0	10.0	295.0	0	0	10	0	10	200.8	10
Cyanide	18.72	0	0	0	0	5.8	0	0	0	0	10	SM4500	10
Arsenic	8.91	0.91	0.69	0.97	1.6	349.0	0	0.7	1.1	8.2	0.5	200.8	0.5
Molybdenum	8.02	0	0	0	0	N/A	0	0	0	0	--	200.8	8
Phenols	N/A	60.0	7.4	110.0	40.0	N/A	0	0	6.6	27.0	5	420.1	5
Beryllium	11.83	0	0	0	0	5.92	0	0	0	0	0.5	200.8	0.5
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	6.961	6.200	3.862	6.988	N/A	6.840	5.959	4.060	5.527			
(3)													
Bis(2-ethylhexyl)phthalate		20					15.0					EPA 625	10

(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	SNC/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			C	C	C
POM, Inc.	3999	433.15	Y	16Dec10	N	2	2			C	C	C
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	C
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 Pretreatment Coordinator

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

Reporting Period January 2013 December 2013
 (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>0/3</u>	<u>2/10</u>
6)	Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . . .		<u>2/13</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>0</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>0</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 2-25-14
 Authorized Representative