

# ADEQ

ARKANSAS  
Department of Environmental Quality

NOV 6 2012

Ken Johnson, Manager  
Pine Bluff Wastewater Utility  
1520 S. Ohio Street  
Pine Bluff, AR 71601-6055

Re: City of Pine Bluff (AFIN: 35-00149 NPDES Permit Number: AR0033316)  
Program Modification for Streamlining Rule Update and TBLL Development

Dear Mr. Johnson:

In reference to the Department's letter dated August 17, 2012, the City must develop local limits for BOD<sub>5</sub>, CBOD<sub>5</sub>, TSS and NH<sub>3</sub>-N or demonstrate that local limits for these conventional pollutants are not necessary. The following paragraph explaining this requirement was included in the August 17, 2012 letter (see attached).

(1) The City's conclusion in "Section 9: Technically Based Local Limit Evaluation" in Section 9.7 that "...local limits are not necessary at this time..." supports all of the submitted non-conventional data. The Department's review of the 2010 and 2011 DMR data indicates that the POTW's BOD<sub>5</sub>, CBOD<sub>5</sub> and TSS effluent concentrations approached the effluent limits on a consistent basis. Preliminary engineering calculations indicate that the City may need local limits for some of these pollutants. Since the POTW is receiving large organic loadings from several SIUs, the City must develop local limits for BOD<sub>5</sub>, CBOD<sub>5</sub>, TSS and NH<sub>3</sub>-N (or demonstrate that local limits for these conventional pollutants are not necessary).

Please note that not only is the MAHL for BOD<sub>5</sub> exceeded routinely (in March 2010, 46,229 lbs/day entered the POTW) but also during March 2010 a TSS slug load (TSS reported at 1223 mg/l & 128,343 lbs/day entered the North Aerated Pond) entered the POTW. Since the detention time was almost a year, the POTW struggled to meet the BOD<sub>5</sub> and TSS limits until March 2011 when the slug finally dissipated.

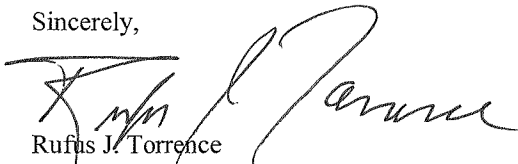
The City must not only take steps to control organic loadings from SIUs but must ensure that slugs do not enter the treatment plant. In accordance with **40 CFR 403.8(f)(4)**, the City must develop local limits for BOD and TSS or submit detailed documentation that local limits are not necessary. The City may issue permits with mass limits for BOD<sub>5</sub> and TSS or include BMPs (Best Management Practices) in lieu of numeric limits. In accordance with **40 CFR 403.8(f)(2)(vi)**, the City must require all SIUs with the potential to discharge organic slug loads to develop a Slug Control Plan.

The Department has enclosed a spreadsheet with MAILs for BOD<sub>5</sub> and TSS. The City may accept the loadings in the spreadsheet for allocation or independently develop MAILs.

The Department will expect the City to concur with the findings in this letter or submit an independent evaluation. In either case, the City must respond by December 3, 2012.

If the City has questions or concerns, please do not hesitate to contact the Department at (501) 682-0626 or [torrence@adeq.state.ar.us](mailto:torrence@adeq.state.ar.us).

Sincerely,



Rufus J. Torrence  
Water Division Engineer

Attachments: (1) Pine Bluff TBLL Excel Spreadsheet (sent by email dated 11-5-2012)  
(2) EPA Local Limits Guidance Excerpt (sent by email dated 11-5-2012)  
(3) ADEQ Letter dated August 17, 2012 (sent by email dated 11-5-2012)