

From: [Jamie Belcourt \(adpce.ad\)](#)
To: "Dennis Brunson"
Cc: [Stacie Wassell \(adpce.ad\)](#); [Richard Healey \(adpce.ad\)](#)
Subject: RE: Hot Springs Pretreatment Performance Summary 2022
Date: Tuesday, January 31, 2023 3:05:26 PM
Attachments: [image003.png](#)

Mr. Brunson,

DEQ's OWQ has received the City of Hot Springs' (NPDES Permits AR0033880 & AR0050148) Annual Pretreatment Report for the January 2022 – December 2022 reporting year.

During review of the submitted report, it was noted that the Southwest Wastewater Treatment Plant (AR0033880) has exceeded the maximum allowable headworks concentration (MAHC) for arsenic for each quarter during the reporting year. DEQ requests that the City of Hot Springs address the arsenic exceedances of the MAHC by investigating the cause of the high loading, identifying any noncomplying industries, and increasing monitoring of its industrial users. Please provide a response detailing the City's investigation into the cause, documentation of any industrial not in compliance, and results of additional monitoring conducted.

Further, please provide documentation of the inspections and sampling events conducted during this reporting period, and include any notices of violation issued to the City's industrial users.

If you have any questions, please feel free to reach out to me.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
**Division of Environmental Quality | Office of Water Quality
Policy and Administration**

5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: Dennis Brunson [mailto:DBrunson@cityhs.net]
Sent: Friday, January 27, 2023 11:02 AM
To: Jamie Belcourt (adpce.ad)
Subject: Re: Hot Springs Pretreatment Performance Summary 2022

Ms. Belcourt,

Please find the following attachment. If you have any questions and/or concerns, please let me know.

Thanks,

Dennis R. Brunson

Pretreatment Coordinator
Industrial Pretreatment Division
City of Hot Springs Utilities
501-262-1881 ext 2861
501-520-9267 (Cell)
501-262-0339 fax
www.cityhs.net



This email, including any attachment (s) to it, is confidential and intended solely for the use of the individual or entity to which it is addressed. If you have received this email in error, please notify the sender immediately. The City of Hot Springs does not accept liability for any damage caused by any virus transmitted by this email. The recipient should check this email and any attachment (s) for the presence of viruses.



City of Hot Springs
Municipal Utilities
WWTP
320 Davidson Drive
Hot Springs, AR 71902
501-262-1881
501-262-0339 fax

January 27, 2023

Arkansas Department of Environmental Quality
Attn: Jamie Belcourt
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Pretreatment Performance Summary (PPS)

Ms. Belcourt,

Please find enclosed the City of Hot Springs Municipal Utilities' 2022 pretreatment performance summary.

If you have any questions, comments and/or need additional information, please let me know.

Sincerely,

A handwritten signature in blue ink that reads "Dennis R. Brunson". The signature is fluid and cursive, with a large loop at the end.

Dennis R. Brunson
Pretreatment Coordinator

Enclosure

C: Harold Mauldin, Facilities Operations Manager
Monty Lebetter, Utilities Director
Bill Burrough, City Manager

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: January, 2022 TO December, 2022
TREATMENT PLANT: City of Hot Springs Regional WWTP NPDES PERMIT #AR0033880
AVERAGE POTW FLOW: 10.31 MGD % IU FLOW: 14.8 %

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		EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)		
		Date	Date	Date	Date	Date	Date		Date	Date	Date	Date					
		2/7/2022	4/11/22	9/21/22	10/31/22	2/7/2022	4/11/22		9/21/22	10/31/22	2/7/2022	4/11/22				9/21/22	10/31/22
Antimony	N/A	<60	<5	<60	<60	<60	N/A	<60	<5	<60	<60	<60	200.8	60	60		
Cadmium	8.96	<0.5	<0.5	<0.5	<0.5	<0.5	23	<0.5	<0.5	<0.5	<0.5	<0.5	200.8	0.5	0.5		
Copper	131.11	21	29	55	27	27	450	2.6	3.4	4.8	2.7	2.7	200.8	0.5	0.5		
Lead	11.59	1.7	3.3	4.6	2.4	2.4	34	<0.5	<0.5	<0.5	<0.5	<0.5	200.8	0.5	0.5		
Mercury	0.06	0.021	0.024	<0.005	0.071	0.071	0.5	0.0013	<0.005	<0.005	<0.005	<0.005	245.7	.005	0.005		
Nickel	70.63	2.0	2.6	3.4	2.8	2.8	780	1.1	1.5	2.2	1.6	1.6	200.8	0.5	0.5		
Selenium	14.13	<5	<5	<5	<5	<5	N/A	<5	<5	<5	<5	<5	200.8	5	5		
Silver	6.20	<0.5	<0.5	0.52	1.4	1.4	6	<0.5	<0.5	<0.5	<0.5	<0.5	200.8	0.5	0.5		
Zinc	688.68	92	89	220	110	110	2130	21	25	23	35	35	200.8	20	20		
Chromium	258.41	<10	<10	26	12	12	8180	<10	<10	<10	<10	<10	200.8	10	10		
Cyanide	32.25	<0.01	<0.01	<0.01	<0.01	<0.01	70	<0.01	<0.01	<0.01	<0.01	<0.01	SM 4500- CN C, E 2011	0.01	0.01		
Arsenic	11.77	20	29	33	44	44	N/A	1.9	3.9	3.5	5.1	5.1	200.8	0.5	0.5		
Molybdenum	10.59	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Phenols	N/A	0.057	0.090	<0.5	0.18	0.18	N/A	0.017	0.081	<0.005	0.0066	0.0066	420.1	0.005	0.005		
Beryllium	20.38	<0.01	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	<0.5	200.8	0.5	0.5		
Thallium	N/A	<0.5	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	<0.5	200.8	0.5	0.5		
Flow_MGD	N/A	11.75	14.49	6.71	6.54	6.54	N/A	11.75	14.49	6.71	6.54	6.54					
(3)																	
Bis(2-ethylhexyl) phthalate		5.7											625.1	5.0	5.0	5.0	
2,6-Dinitrotoluene		20											625.1	5.0	5.0	5.0	

ATTACHMENT A
PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	SIC/NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (N/A, C, NC, or SNC)				Permit Limits (denote parameter violated & number of times)
			Y/N	Last Action				Reports			Self Monitoring	
								BMR	90-day Compliance	Semi Annual		
ORG Chem Group	324110	437	Yes	4/2/20	No	1	8	N/A	N/A	C	C	Compliant
Radius Aerospace, Inc.	332813	433	Yes	7/2/20	No	1	9	N/A	N/A	C	C	Compliant
Triumph Airborne Structures, Inc.	332813	433	Yes	8/2/20	No	1	8	N/A	N/A	C	C	Compliant
Alliance Rubber	326299	428	Yes	3/2/20	No	1	10	N/A	N/A	C	C	Compliant
Non-Significant (Yet Permitted)												
NPMC Hospital	622110	460	Yes	5/2/21	No	1	9	N/A	N/A	C	C	Compliant
St. Vincent Med Hospital	622110	460	Yes	5/2/21	No	1	8	N/A	N/A	C	C	Compliant
Mountain Valley Water (Transported)	221310	N/A	Yes	4/1/20	No	1	0	N/A	N/A	C	C	Compliant

Include NAICS code (s)

3rd column ✕ include the CFR # only if the Category has Pretreatment Standards (numeric or narrative)
Please footnote N/A reason

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 of Hot Springs Municipal Utilities

Address 320 Davidson Dr.

City Hot Springs National Park State/Zip Arkansas 71901

Contact Person Dennis R. Brunson Position: Pretreatment Coordinator

Contact Telephone 501-262-1881 Ext 2861 NPDES Permit Nos. AR0033880

Reporting Period January 1, 2022 December 31, 2022
 (Beginning Month, day and Year) (Ending Month, day and Year)

Total Number of Categorical IUs 3

Total Number of Significant Noncategorical IUs 1

Total Number of Non-Significant (yet permitted) IUs 4

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>0/0</u>	<u>0/0</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>0/0</u>	<u>0/0</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical) . .	<u>0/0</u>	

III. Compliance Monitoring Program

SIGNIFICANT INDUSTRIAL USERS

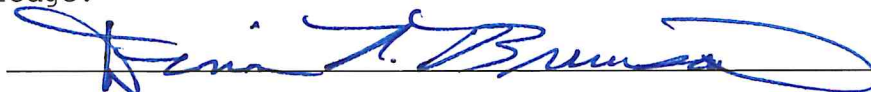
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued / Total No. Required.	<u>3/3</u>	<u>1/1</u>
2) No. of Non-sampling Inspections Conducted / Total No. Required.	<u>3/3</u>	<u>1/1</u>
3) No. of Sampling Visits Conducted / Total No. Required.	<u>25/6</u>	<u>10/2</u>
4) No. of Facilities Inspected (nonsampling) / Total No. Required.	<u>3/3</u>	<u>1/1</u>
5) No. of Facilities Sampled / Total No. Required.	<u>3/3</u>	<u>1/1</u>

IV. Enforcement Actions

	<u>SIGNIFICANT Categorical</u>	<u>INDUSTRIAL USERS 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>1</u>	<u>0</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>0</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.



 Authorized Representative Date 27 Jan 23