

Torrence, Rufus

From: Torrence, Rufus
Sent: Wednesday, January 28, 2009 2:48 PM
To: 'Dennis Brunson'
Cc: 'Ron Wacaster'; 'Larry Merriman'; 'Steve Mallett'; Fuller, Kim; Garner, Cindy; Roberts, Anne; Gilliam, Allen
Subject: RE: AFIN 26-00145 AR0033880 City of Hot Springs Technically Based Local Limits (TBLL)

Tracking:	Recipient	Delivery	Read
	'Dennis Brunson'		
	'Ron Wacaster'		
	'Larry Merriman'		
	'Steve Mallett'		
	Fuller, Kim	Delivered: 01-28-2009 2:48 PM	
	Garner, Cindy	Delivered: 01-28-2009 2:48 PM	
	Roberts, Anne	Delivered: 01-28-2009 2:48 PM	Read: 01-28-2009 4:49 PM
	Gilliam, Allen	Delivered: 01-28-2009 2:48 PM	Read: 01-28-2009 3:09 PM

Dennis,

Steve's letter indicated that the City officials "need to establish current water quality characteristics at our plant and within the collection system..". The City should already have sufficient influent and effluent samples since the NPDES permit requires quarterly sampling for influent and effluent.

Since the City wants to void the local limits shown in the pretreatment ordinance no. 4577 (Section 9-3-43.4) and the City wishes to have some form of control over the local industries, I recommend that the City consider performance-based local limits. These limits reflect the industries historical discharge to the POTW and provide "control".

Finally, the City does not need domestic sampling results to develop MAHLs. The City already has sufficient information to develop MAHLs. The City does not have to "replace" the numbers in the existing ordinance. The City may completely omit numbers in the next ordinance and only reference a TBLL document with MAHLs/MAILs (Maximum Allowable Headworks Loadings/Maximum Allowable Industrial Loadings).

I can furnish the City with recommended MAHLs but I need the current sludge rate.

In conclusion, the local limit process is an ongoing process and not just an isolated occurrence. Since the City has sufficient sampling information to submit the MAHLs to ADEQ now, I see no reason to grant an extension.

The MAHLs must be submitted by March 1, 2009.

Rufus, ADEQ

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

From: Dennis Brunson [mailto:DBrunson@cityhs.net]
Sent: Friday, January 23, 2009 4:49 PM
To: Torrence, Rufus
Cc: Ron Wacaster; Larry Merriman; Steve Mallett
Subject: RE: AFIN 26-00145 AR0033880 City of Hot Springs Technically Based Local Limits (TBLL)

Rufus,

We are going to do some more sampling and lab testing for our engineering firm. Summertime is the best time for sampling and lab testing because, our plant flows are low. We're looking at the latter part of this year. Please, feel free to contact me

Thanks,

Dennis R. Brunson

Pretreatment Coordinator
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From: Torrence, Rufus [mailto:TORRENCE@adeq.state.ar.us]
Sent: Friday, January 23, 2009 12:42 PM
To: Dennis Brunson
Cc: Fuller, Kim; Garner, Cindy
Subject: AFIN 26-00145 AR0033880 City of Hot Springs Technically Based Local Limits (TBLL)

Dennis,

I have a letter from Steve Mallett dated 1-14-2009; he is asking for an extension to submit the TBLL package to us.

The TBLL revisions are due by February 1, 2009.

When do you think you will have it ready?

Rufus, ADEQ