

Torrence, Rufus

From: Torrence, Rufus
Sent: Friday, March 20, 2009 8:22 AM
To: 'Dennis Brunson'
Subject: AFIN 26-00145 AR0033880 City of Hot Springs 2009 Annual Report

Dennis,

I have reviewed your January 2009 Annual Report. First, I want to congratulate you on submitting a complete and very thorough report. However, I have a few suggestions to improve your report and program implementation.

1. Please do not mix reporting units; all concentrations should be reported in micrograms/liter (ug/l).
2. If a pollutant is not detected, do not show the <DL but list "0" for this sampling event.
3. To avoid placing SIUs in SNC for only one (1) violation in a six month period, you might consider sampling them more than one time per six months. For instance, you might consider sampling SIUs with O&G limits at least four times in a six month period. If one sample in four shows non-compliance, then only 25% of the measurements exceeded the pretreatment standard and therefore SNC does not apply.

Note: The Technical Review Criteria (TRC) for O&G is 1.4; therefore, if the actual measurement of FOG is 30 mg/l, then you must use $30 \times 1.4 = 42$ mg/l to compare with the permit limit. For FOG, 40 CFR 403.8(f)(2)(viii)(B) specifies that at least 33% of all measurements must exceed the product before SNC applies; therefore, if you sample only 3 times in a six month period and one sample is "over", then $33 \frac{1}{3}$ % applies in this case and the SIU is in SNC.

For more information, please review Appendix A in the "EPA Pretreatment Compliance Monitoring and Enforcement Guidance" for more details.

Let me know if you have questions or concerns,

Rufus, ADEQ

NPDES PERMIT FILE
 NPDES # AR0033880
 AFIN # 26-00145
 Permit PN
 Correspondence
 Technical Backup
3/23/09 Date Scanned

IUs checked & updated
ICIS Cycled
Eff/Inf Logged
EiNPDES Pret ANRTU9 updated
R99

6585

JAN 28 2009



1/14

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

January 26, 2009

Arkansas Department of Environmental Quality
Attn: Rufus Torrence
5301 Northshore Drive
Little Rock, AR 72118-5317

Re: Pretreatment Performance Summary (PPS)

Dear Mr. Torrence,

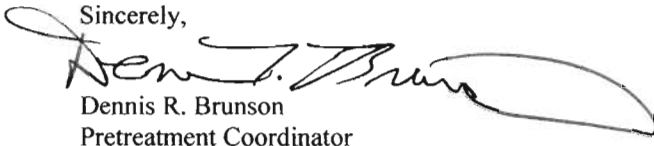
Please find enclosed the City of Hot Springs Municipal Utilities' 2008 performance summary.

Arkansas Extrusion was deleted from the industrial users list. This industry closed its doors as of April 15, 2008. ATOKA, Inc. was also deleted from the industrial users list. This industry chose not to renew its waste hauler permit.

Please note that first, second and third quarter low level Hg results and collection dates are highlighted in red on the report. These samples were collected at different times from our regular table III results.

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

Sincerely,


Dennis R. Brunson
Pretreatment Coordinator

Enclosure

C: Ron Wacaster, Facilities Operations Manager
Larry Merriman, Utilities Director
Steve Mallett, Deputy City Manager

I, THOMAS I. OVERTON Manager of **The Sentinel-Record** a newspaper of

NOTICE OF VIOLATION
City of Hot Springs
Municipal Utilities
Hot Springs National Park,
Arkansas

In the matter of:
Hot Springs Packing Co.
270 Weston Rd.
Hot Springs, AR 71914
Legal Authority:

The following findings are made and notice issued pursuant to the authority vested in the manager of the Municipal Utilities Sewer System under section 1 of the City's Pretreatment Code. This order is based on the findings of violation of the conditions of the wastewater discharge permit issued under section 1 of the City's Pretreatment Code.

Findings:
1. The City of Hot Springs Municipal Utilities is charged with the ongoing construction, maintenance and control of sewer system and treatment works.

2. To protect the sewer system and treatment works, The City of Hot Springs Municipal Utilities administers a Pretreatment Program.

3. Under this pretreatment program, Hot Springs Packing Co. was issued a discharge permit.

4. The discharge permit issued to Hot Springs Packing Co. contained numerical limits on the quality of pollutants, which Hot Springs Packing Co. could discharge and self maintaining requirements.

4. From July 1, 2008 to December 31, 2008, pollutant analysis revealed that the parameter Oil & Grease violated the Technical Review Criteria (TRC) permit limitation.

Therefore, based on the above finding, Hot Springs Packing Co. is hereby notified that it is in violation of its discharge permit and the Pretreatment Code of the City of Hot Springs.

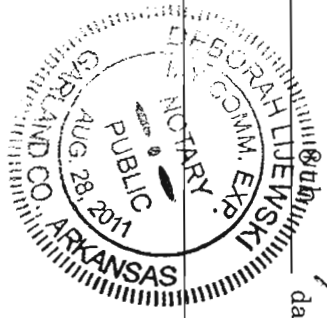
City of Hot Springs
Municipal Utilities
Steve Mallert,
Public Works Director
PO Box 700
Hot Springs National Park, AR
71902

general circulation published, and having bonafide circulation in Hot Springs, Garland County, Arkansas, hereby certify that the legal notice hereto attached was published in said newspaper for 1 consecutive insertions and that the

First insertion was on the	<u>8th</u>	Day of	<u>January</u>	A.D.	<u>2009</u>
Second Insertion was		Day of		A.D.	
Third Insertion was		Day of		A.D.	
Fourth Insertion was		Day of		A.D.	
Fifth Insertion was		Day of		A.D.	
and the last insertion on the	<u>8th</u>	Day of	<u>January</u>	A.D.	<u>2009</u>

Witnessed before me on this _____ day of _____ A.D. 2009

[Signature]
Notary Public



MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
 REPORTING YEAR: 1 Jan 2008 thru 31 Dec 2008 TREATMENT PLANT: City of Hot Springs Municipal Utilities
 AVERAGE POTW FLOW: 12.38 MGD % IU FLOW: 2.00% NPDES PERMIT: AROO33880

Metals, Cyanide and Phenols	MAHL mg/l	Influent Dates Sampled				WQ level/limit mg/l	Effluent Dates Sampled				EPA MCL ug/l	Laboratory Analysis (See Attachment PPS) EPA METHOD USED	DETECTION LEVEL ACHIEVED
		3/23/2008	5/20/2008	8/28/2008	10/29/2008		3/23/2008	5/20/2008	8/28/2008	11/13/2007			
T Antimony	N/A	60	<0.03	<0.03	<60	N/A	60	<0.03	<0.03	<60	80	EPA 200.8	60 ug/l
T Arsenic	1.11	<0.5	0.001	<0.001	<0.5	N/A	<0.5	<0.001	<0.001	<0.5	0.5	EPA 200.8	0.5 ug/l
T Beryllium	N/A	<0.5	<0.0003	<0.0003	<0.5	N/A	<0.5	<0.0003	<0.0003	<0.5	0.5	EPA 200.8	0.5 ug/l
T Cadmium	0.59	<0.5	<0.004	<0.004	<0.5	0.023	<0.5	<0.004	<0.004	<0.5	0.5	EPA 200.8	0.5 ug/l
T Chromium	17.43	<10	<0.01	0.008	11	8.18	<10	<0.007	<0.007	<10	10	EPA 200.8	10 ug/l
T Copper	16.65	2.8	0.068	0.042	40	0.45	2.8	<0.006	<0.006	5.8	0.5	EPA 200.8	0.5 ug/l
T Lead	2.53	3.3	0.0056	<0.04	<0.5	0.034	0.5	<0.005	<0.04	<0.5	0.5	EPA 200.8	0.5 ug/l
T Mercury	0.037	0.042	0.013	0.013	<5 ng/l	0.0005	0.042	0.039	0.005	<5 ng/l	0.005	EPA 245.7	1.8 ng/l
T Molybdenum	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	EPA 200.8	N/A
T Nickel	10.07	2.6	<0.04	<0.01	3.4	0.78	2.3	<0.04	<0.01	2.4	0.5	EPA 200.8	0.5 ug/l
T Selenium	N/A	<5	<0.002	0.002	<5	N/A	<5	<0.002	<0.002	<5	5	EPA 200.8	5 ug/l
T Silver	0.47	<0.5	<0.007	<0.007	2.1	0.006	<0.5	<0.007	<0.007	<0.5	0.5	EPA 200.8	0.5 ug/l
T Thallium	N/A	<0.5	<0.04	<0.04	<0.5	N/A	1	<0.04	<0.04	<0.5	0.5	EPA 200.8	0.5 ug/l
T Zinc	34.08	74	0.14	0.09	120	2.13	28	0.037	0.024	32	20	EPA 200.8	20 ug/l
T Cyanide	2.45	<0.01	<0.01	<0.01	<10	0.07	<0.01	<0.01	<0.01	<10	10	EPA 335.2	10 ug/l
T Phenols	N/A	23	0.061	0.052	<5	N/A	14	<0.005	<0.005	<5	5	EPA 420.1	5 ug/l
Flow, MGD	14.19	8.18	9.25	7.27			17.39	7.67	9.47	7.41			
Bis(2-ethylhexyl)phthalate		3/4/2008	Influent										
Chloroform		3/4/2008	8.7 ug/l										EPA 625
Di-n-butyl phthalate		3/4/2008	3.3 ug/l										EPA 624
Dieldrin		3/4/2008	0.0069 ug/l										EPA 625
													EPA 608

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. Analytical MCLs should be used so that the data can also be used for local limits assessment and NPDES application purpose.
 (2) Record the name of any pollutants [40 CFR 122, Appendix D, Table II and/or Table III] detected and the quantity in which they were detected.
 MAHL- Maximum Allowable Headworks Level

* Numbers in pencil must appear in inf/eff database.

PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User	SIC Code	Categorical Determination	Control Documents			New User	Number of Times Inspected	Number of Times Sampled	BMR	Compliance Status			Effluent Limits
			Y/N	Last Action	Y/N					90-Day Comp	Semi Annual	Self Monitoring	
✓ Mid-America Distillations, Inc.	2899	Categorical	Yes	3/2/2008	No	1	12	0	0	0	12	Compliant	
✓ Hot Springs Packing Co.	2011-01	Noncategorical	Yes	8/2/2008	No	3	20	0	0	0	12	Compliant	
✓ Triumph Fabrications Hot Springs	3471-02	Categorical	Yes	7/2/2008	No	2	10	0	0	0	103	Compliant	
✓ Alliance Rubber Co.	3069-02	Noncategorical	Yes	3/2/2008	No	1	11	0	0	0	24	Compliant	
✓ National Park Medical Center	8062-01	Noncategorical	Yes	5/3/2008	No	2	15	0	0	0	12	Compliant	
✓ St. Joseph Regional Health Center	8062-01	Noncategorical	Yes	5/2/2008	No	1	10	0	0	0	12	Compliant	
✓ Wacaster Oil Co.	5983-03	Noncategorical	Yes	3/2/2008	No	0	0	0	0	0	0	Compliant	
✓ Triumph Airborne Structures, Inc.	3471-02	Categorical	Yes	8/2/2008	No	1	2	0	0	0	24	Compliant	
✓ Craighead Cleaners Inc.	7218-04	Noncategorical	Yes	4/3/2008	No	2	15	0	0	0	12	Compliant	

SIGNIFICANT NONCOMPLIANCE USER-ENFORCEMENT ACTION TAKEN

Industrial User	Nature of Violation		Number of Actions Taken			Compliance Schedule			Current Status	Comments			
	Reports	Limits	N.O.V.	A.O.	Civil	Crimal	Other	Penalties Collected			Schedule Date issued	Date Due	
Hot Springs Packing Co.	Exceeded Oil & Grease Permit Limit		issued 9/12/2008	None	None	None	None	PNOV 1/8/2009	None	N/A	N/A	Compliant	Publication Notice of Violation in Local Newspaper

Attachment C-1/3

Pretreatment Performance Summary (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT EPA AUTHORIZATION.

I. General Information

Control Authority Name: Hot Springs Municipal Utilities

Address: 320 Davidson Dr.

City: Hot Springs State: Ar Zip: 71901

Contact Person: Dennis R. Brunson Title: Pretreatment Coordinator

Contact Telephone: 501-262-1881 Ext 15

NPDES Permit No: AR0033880

Reporting Period: January 1, 2008 December 31, 2008
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs: 3

Total Number of Noncategorical IUs: 6

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>
1. No. of SIUs Submitting BMRS/Total No Required.....	<u>0/3</u>	<u>N/A</u>
2. No. of SIUs Submitting 90 day Compliance Reports/ No. Required...	<u>0/3</u>	<u>N/A</u>
3. No. of SIUs Submitting Semi-annual Reports/Total No. Required.....	<u>3/3</u>	<u>5/6</u>
4. No. of SIUs Meeting Compliance Schedule/Total No. Required to Meet Schedule.....	<u>0/0</u>	<u>0/0</u>

Attachment C-2/3

SIU Compliance (cont.)

	<u>Categorical</u>	<u>Noncategorical</u>
5. No. of SIUs in Significant Noncompliance/Total No. of SIUs....	<u>0/3</u>	<u>1/6</u>
6. Rate of Significant Noncompliance For all SIUs Categorical and Noncategorical.....	<u>1/9</u>	

III. Compliance Monitoring Program

1. No. of Control Documents Issued/ Total No. Required.....	<u>3</u>	<u>6</u>
2. No. of Nonsampling Inspections Conducted.....	<u>3</u>	<u>5</u>
3. No. of Sampling Visit Conducted.....	<u>24</u>	<u>71</u>
4. No. of Facilities Inspected Nonsampling.....	<u>3</u>	<u>5</u>
5. No. of Facilities Sampled.....	<u>3</u>	<u>5</u>

IV. Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>
1. No. of Compliance Schedules Issued/No. Of Schedules Required.....	<u>0</u>	<u>0</u>
2. No. of Notices of Violations Issued to SIUs.....	<u>0</u>	<u>1</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>

Attachment C-3/3

	<u>Categorical</u>	<u>Noncategorical</u>
6. No. of Significant Violators (Attach newspaper publication).....	<u>0</u>	<u>1</u>
7. Amount of Penalties Collected (total dollars IUs assessed).....	<u>0</u>	<u>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: Gene J. Brunson

Title: Pretreatment Coordinator Date: 26 JAN 09

PPS Program Report

* NPDES ID: AR0033800 Permittee's Name Hot Springs

* Report Received/Event Date: 01/28/09

Date 3-18-09

Report Type

- Biosolids Program Report
- CAFO Annual Report
- CSO Event Report
- Local Limits Report
- MS4 Program Report
- Pretreatment Performance Summary Report
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

Report Information

* Pretreatment Performance Summary Start Date: 01/01/2008

Significant Industrial Users (SIUs)

- SIUs: 9
- SIUs Without Control Mechanism: 0
- SIUs Not Inspected: 0
- SIUs Not Sampled: 0
- SIUs in SNC with Pretreatment Standards: 1
- SIUs in SNC with Reporting Requirements: 0
- SIUs in SNC with Pretreatment Schedule: 0
- SIUs in SNC Published in Newspaper: 1
- SIUs Schedules: 0
- Violation Notices Issued to SIUs: 1
- Administrative Orders Issued to SIUs: 0
- Civil Suits Filed Against SIUs: 0
- Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

- CIUs: 3
- CIUs in SNC: 0

Penalties

Dollar Amount of Penalties Collected: \$ 0

Industrial Users (IUs) from which Penalties have been collected: 0

Other Information

SUO Reference: _____

SUO Date: _____

Annual Pretreatment Budget: \$ _____

Pass-Through/Interference Indicator:

Notification of IU Schedule for Remedial Measures: No

Immediate Response to Violation of IU Schedule for Remedial Measures:

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits: 02/04/09

Date of Most Recent Adoption of Technically-Based Local Limits: 02/25/2008

Local Limit Pollutants: _____

Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval: _____

Removal Credits: _____

Acceptance of Waste

Acceptance of Hazardous Waste: No

Acceptance of Non-Hazardous Industrial Waste: No

Acceptance of Hauled Domestic Wastes: No

Deficiencies

Deficiencies Identified During IU File Review: No

Control Mechanism Deficiencies: No

Legal Authority Deficiencies: No

Deficiencies in Data Management and Public Participation: No

Deficiencies in Interpretation and Application of Pretreatment Standards: No

Inadequacy of Sampling and Inspections: No

Adequacy of Pretreatment Resources: Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling: _____

Annual Frequency of Effluent Toxicant Sampling: _____

Annual Frequency of Sludge Toxicant Sampling: _____