

Torrence, Rufus

From: Torrence, Rufus
Sent: Tuesday, February 02, 2010 3:47 PM
To: 'Dennis Brunson'
Subject: AFIN 26-00145 AR0033880 City of Hot Springs 2009 Annual Report



ARKANSAS
Department of Environmental Quality

February 2, 2010

Dennis R. Brunson, Pretreatment Coordinator
City of Hot Springs
P. O. Box 700
Hot Springs, Arkansas 71901

Re: City of Hot Springs 2009 Annual Pretreatment Report
(Permit No. AR0033880, AR0043401 AFIN 26-00145)

Dear Mr. Brunson:

The Department has reviewed the City's 2009 Annual Pretreatment Report and the report is complete. However, the Department has some recommendations to improve the City's program operation and reporting.

1. Please do not mix reporting units. All concentrations should be reported in micrograms/liter (ug/l).
2. To avoid placing SIUs in SNC for only one (1) violation in a six month period, the city might consider sampling SIUs more than one time per six months. For instance, the City 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 the City 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 the City samples 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.

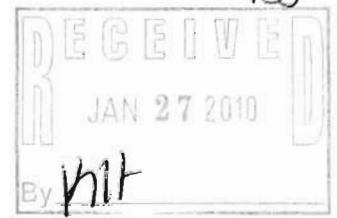
The Department appreciates the City's continued efforts in annual reporting. If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Rufus Torrence", is written over a faint, light-colored background.

Rufus Torrence, Pretreatment Engineer
Water Division

IUs checked & updated
ICIS coded
Eff/Inf Logged
ANRT10 updated
R



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

January 20, 2010

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' 2009 performance summary.

Please note that the first, second, third and fourth 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,

A handwritten signature in black ink, appearing to read "Dennis R. Brunson".

Dennis R. Brunson
Pretreatment Coordinator

Enclosure

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

THOMAS J. OVERTON

Manager, of **The Sentinel-Record** a newspaper of

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 _____ consecutive insertions and that the

First insertion was on the 9th Day of January A.D. 2010

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 9th Day of January A.D. 2010

NOTICE OF VIOLATION

City of Hot Springs
Municipal Utilities
Hot Springs National Park,
Arkansas

In the matter of: National Park
Medical Center
1910 Malvern Ave.
Hot Springs, AR, 71901

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 Ci-
ty's Pretreatment Code. This or-
der is based on the findings of
violation of the conditions of the
wastewater discharge permit is-
sued under section 1 of the C-
Pretreatment Code.

Findings:
The City of Hot Springs
Utilities is charged with
the duty to maintain

[Handwritten signature]

Sworn to and subscribed before me on this 13th day of January A.D. 2010



[Handwritten signature: Deborah Lijeowski]
Notary Public

ITAL

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
 REPORTING YEAR: 1 Jan ; TREATMENT PLANT: City of Hot Springs Municipal Utilities
 AVERAGE POTW FLOW: 12.91 MGD % U FLOW: 2.00% NPDES PERMIT: AR0033880

Metals, Cyanide and Phenols	MAHL mg/l	Influent Dates Sampled				WQ level/limit mg/l	Effluent Dates Sampled				EPA MQL ug/l	Laboratory Analysis (See Attachment PPS) EPA METHOD USED	DETECTION LEVEL ACHIEVED	
		2/15/2009 ug/l	4/19/2009 ug/l	7/19/2009 ug/l	11/8/2009 ug/l		2/15/2009 ug/l	4/19/2009 ug/l	7/19/2009 ug/l	11/8/2009 ug/l				
T Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	EPA 200.8	60 ug/l	
T Arsenic	1.11	0	0	0	0	N/A	0	0	0	0	0.5	EPA 200.8	0.5 ug/l	
T Beryllium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	EPA 200.8	0.5 ug/l	
T Cadmium	0.59	0	0	1.3	0	0.023	0	0.64	0	0	0.5	EPA 200.8	0.5 ug/l	
T Chromium	17.43	0	0	0	0	8.18	0	0	0	0	10	EPA 200.8	10 ug/l	
T Copper	16.65	21	18	42	30	0.45	14	4.2	3.1	0.5	0.5	EPA 200.8	0.5 ug/l	
T Lead	2.53	1.5	1.3	4	2.4	0.034	0	0	0	0	0.5	EPA 200.8	0.5 ug/l	
T Mercury	0.037	0.0053 3.3 ng/l 2/24/2009	0.130 130 6/9/2009	0.1 100 ng/l 8/18/2009	0.033 33 ng/l 12/1/2009	0.0005	0 3.6 ng/l 2/24/2009	0 0 8/18/2009	0 0 12/1/2009	0.005	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	1.8	2.6	4.5	2.8	0.78	2.8	2.8	1.9	0.5	0.5	EPA 200.8	0.5 ug/l	
T Selenium	N/A	0	0	0	0	N/A	0	0	0	0	5	EPA 200.8	5 ug/l	
T Silver	0.47	0	0	0	0.68	0.006	0	0	0	0.5	0.5	EPA 200.8	0.5 ug/l	
T Thallium	N/A	0	0	0	0	N/A	0	0	0	0.5	0.5	EPA 200.8	0.5 ug/l	
T Zinc	34.08	50	42	87	72	0.07	24	0	0	20	20	EPA 200.8	20 ug/l	
T Cyanide	2.45	0	0	0	0	0.07	0	0	0	10	10	EPA 335.2	10 ug/l	
T Phenols	N/A	77	12	16	16	N/A	0	0	20	5	5	EPA 420.1	5 ug/l	
Flow, MGD		12.76	18.6	8.32	15.36		12.76	18.6	8.32	15.36				
Bis(2-ethylhexyl)phthalate		2/8/2009		59 ug/l									EPA 625	2.5 ug/l
Chloroform		2/8/2009		3.6 ug/l									EPA 624	1.6 ug/l
Diethyl phthalate		2/8/2009		4.2 ug/l									EPA 625	2.5 ug/l
Phenol		2/8/2009		2 ug/l									EPA 625	0.002 ug/l
gamma-BHC (lindane)		2/8/2009		0.017 ug/l									EPA 608	0.004 ug/l

(1) It is advised that the Influent and effluent samples are collected considering flow detention time through each plant. Analytical MQLs 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

* Typo... "1/01/1900" should be "0" per tel conv (Torrence w/Brunson 2-2-10 @ 8:30am)

Attachment A

PRETREATMENT PROGRAM STATUS REPORT UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User	SIC Code	Categorical Determination	Control Documents			Number of Times Inspected	Number of Times Sampled	BMR	Compliance Status			Effluent Limits
			Y/N	Last Action	New User				90-Day Comp	Semi Annual	Self Monitoring	
✓ Mid-America Distillations, Inc.	2869	Categorical	Yes	3/2/2008	No	1	6	0	0	0	18	Compliant
✓ Hot Springs Packing Co.	2011-01	Noncategorical	Yes	8/2/2008	No	1	17	0	0	0	12	Compliant
✓ Triumph Fabrications Hot Springs	3471-02	Categorical	Yes	7/2/2008	No	2	6	0	0	0	109	Compliant
✓ Alliance Rubber Co.	3069-02	Noncategorical	Yes	3/2/2008	No	1	4	0	0	0	39	Compliant
✓ National Park Medical Center	8062-01	Noncategorical	Yes	5/3/2008	No	2	6	0	0	0	12	Compliant
✓ St. Joseph Regional Health Center	8062-01	Noncategorical	Yes	5/2/2008	No	1	5	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	6	0	0	0	32	Compliant
✓ Craighead Cleaners Inc.	7218-04	Noncategorical	Yes	4/3/2008	No	1	4	0	0	0	12	Compliant

Attachment B

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	Penalties Collected	Date Issued	Date Due			
National Park Medical Center	Exceeded Permit Limit	Oil & Grease	None	None	None	None	PNOV 1/8/2009	N/A	N/A	Compliant	Publication Notice of Violation in Local Newspaper

Attachment C

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, 2009 December 31, 2009
(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>

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>4</u>	<u>6</u>
3. No. of Sampling Visit Conducted.....	<u>18</u>	<u>36</u>
4. No. of Facilities Inspected Nonsampling.....	<u>4</u>	<u>6</u>
5. No. of Facilities Sampled.....	<u>3</u>	<u>5</u>

IV. Enforcement Actions

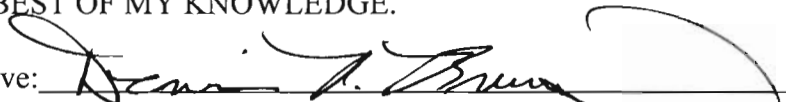
SIGNIFICANT INDUSTRIAL USERS

	<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>

	<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: 

Title: Pretreatment Coordinator Date: 19 Jan 10

PPS Program Report

* NPDES ID: AR0033800 Permittee's Name City of Hot Springs
 * Report Received/Event Date: 01/27/2010 Date 2-2-10

Report Type

- Select a Program Report to add:
- 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: 01/01/2009

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

Local 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: 11/18/1996

Local Limit Pollutants: As, Cd, Cr, Cu, CN, Pb, Hg, Ni, O&G, Ag, Zn

See back →

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: 4

Annual Frequency of Effluent Toxicant Sampling: 4

Annual Frequency of Sludge Toxicant Sampling: 4