

## Torrence, Rufus

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**From:** Torrence, Rufus  
**Sent:** Tuesday, February 01, 2011 8:57 AM  
**To:** Dennis Brunson  
**Subject:** AFIN 26-00145 AR0033880 City of Hot Springs 2010 Annual Report  
**Attachments:** AR0033880\_Hot Springs MAHL and Draft Ordinance\_20090520.pdf; HTSP Inf-Eff Chart.doc; image001.gif; image002.gif; image003.gif



February 1, 2011

Dennis R. Brunson, Pretreatment Coordinator  
City of Hot Springs  
320 Davidson Drive  
Hot Springs, Arkansas 71902

Re: City of Hot Springs 2010 Annual Pretreatment Report  
(Permit No. AR0033880, AFIN 26-00145)

Dear Mr. Brunson:

The Department has reviewed the City's 2010 Annual Report. The report is complete. However, the Department cannot verify the MAHCs listed on the influent-effluent chart in the report.

In a letter dated May 20, 2009 the Department recommended that the City used the MAHCs developed by ADEQ. For expediency, the Department recommends that the City list the MAHCs shown on the Local Limits worksheet in the attached TBLI workbook. For the City's convenience, the Department has attached a chart with these MAHCs listed.

The Department appreciates the City's continued efforts in annual reporting and the City will not be required to submit any additional information for the 2010 annual report.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at [torrence@adeq.state.ar.us](mailto:torrence@adeq.state.ar.us) .

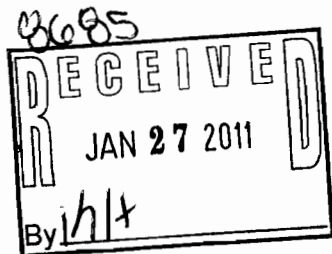
Sincerely,

A handwritten signature in black ink, appearing to read "Rufus Torrence". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Rufus Torrence, Pretreatment Engineer  
Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
5301 NORTHSORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72113-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0745  
[www.adeq.state.ar.us](http://www.adeq.state.ar.us)

RT



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

January 24, 2010

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

Re: Pretreatment Performance Summary (PPS)

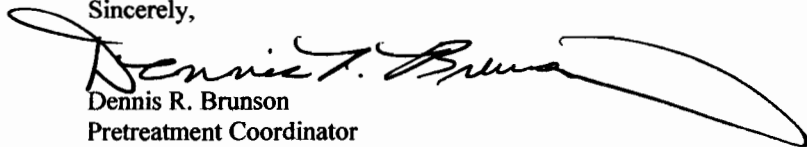
Dear Mr. Torrence,

Please find enclosed the City of Hot Springs Municipal Utilities' 2010 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,

  
Dennis R. Brunson  
Pretreatment Coordinator

Enclosure

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

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT  
 REPORTING YEAR: 1 Jan;  
 AVERAGE POTW FLOW: 10.03 MGD  
 TREATMENT PLANT: City of Hot Springs Municipal Utilities  
 % 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 (See Attachment PPS) ug/l Laboratory Analysis EPA METHOD USED DETECTION LEVEL ACHIEVED

Parameter	MAHL mg/l	Influent Dates Sampled					Effluent Dates Sampled					EPA MCL (See Attachment PPS) ug/l	Laboratory Analysis EPA METHOD USED	DETECTION LEVEL ACHIEVED
		3/7/2010 ug/l	5/16/2010 ug/l	7/25/2010 ug/l	10/17/2010 ug/l	3/7/2010 ug/l	5/16/2010 ug/l	7/25/2010 ug/l	10/17/2010 ug/l	3/10/2010 ug/l	6/14/2010 ug/l			
T Antimony	N/A	0	0	0	0	N/A	0	0	0	60	EPA 200.8	60 ug/l		
T Arsenic	1.11	0	0	0	0	N/A	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	0.5	EPA 200.8	0.5 ug/l		
T Cadmium	0.59	0	0	1.3	0	0.023	0	0	0.64	0.5	EPA 200.8	0.5 ug/l		
T Chromium	17.43	0	0	0	0	8.18	0	0	0	10	EPA 200.8	10 ug/l		
T Copper	16.65	29	22	62	52	0.45	14	3	4.1	0.5	EPA 200.8	0.5 ug/l		
T Lead	2.53	1.9	3.1	4.1	3.3	0.034	0.89	0	0	0.5	EPA 200.8	0.5 ug/l		
T Mercury	0.037	21 ng/l	40 ng/l	44 ng/l	16 ng/l	0.0005	30 ng/l	65 ng/l	0 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	EPA 200.8	N/A		
T Nickel	10.07	2.6	3.3	4.5	4	0.76	3	2.6	2.9	0.5	EPA 200.8	0.5 ug/l		
T Selenium	N/A	0	0	0	0	N/A	0	0	0	5	EPA 200.8	5 ug/l		
T Silver	0.47	0.86	0	1.2	4.8	0.006	0	0	0	0.5	EPA 200.8	0.5 ug/l		
T Thallium	N/A	0	0	0	0	N/A	0	0	0	0.5	EPA 200.8	0.5 ug/l		
T Zinc	34.08	69	53	130	110	34	0	0	22	20	EPA 200.8	20 ug/l		
T Cyanide	2.45	0	0	0	0	0.07	0	0	0	10	EPA 335.2	10 ug/l		
T Phenols	N/A	0.022	0.021	0.018	0.036	N/A	0.0077	0	0	5	EPA 420.1	5 ug/l		
Flow, MGD	8.27	13.95	6.9	6.89	10.57	13.9	6.5	7.1						
Bis(2-ethylhexyl)phthalate	2/28/2010	Influent	19 ug/l	0 ug/l	2.8 ug/l	0 ug/l								
Chloroform	2/28/2010	Influent	3.0 ug/l	2.8 ug/l	0 ug/l									
Diethyl phthalate	2/28/2010	Influent	2.3 ug/l	0 ug/l	0 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

X MAHL/MAHL source unknown.

# Attachment B

## SIGNIFICANT NONCOMPLIANCE USER-ENFORCEMENT ACTION TAKEN

Industrial User	Nature of Violation	Number of Actions Taken	Compliance Schedule	Date	Current Status	Comments
Mid-America Distillations, Inc.	Reports Exceeded Permit Limits O & G	N.O.V. Issued	A.O. None	Civil None	Criminal None	Other None
			Penalties Collected	Date Issued	Date Due	
			None	N/A	N/A	Compliant
						A one time isolated incident

# Attachment A

## PRETREATMENT PROGRAM STATUS REPORT UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User	SIC Code	Categorical Determination	Control Documents				Compliance Status				Effluent Limits	
			Y/N	Last Action	New User	Number of Times Inspected	Number of Times Sampled	BMR	90-Day Comp	Seml Annual		Self Monitoring
Mid-America Distillations, Inc.	2899	Categorical	Yes	3/2/2008	No	1	15	0	0	0	24	Compliant
Hot Springs Packing Co.	2011-01	Noncategorical	Yes	8/2/2008	No	2	8	0	0	0	12	Compliant
Triumph Fabrications Hot Springs	3471-02	Categorical	Yes	7/2/2008	No	1	5	0	0	0	118	Compliant
Alliance Rubber Co.	3099-02	Noncategorical	Yes	3/2/2008	No	1	3	0	0	0	34	Compliant
National Park Medical Center	8062-01	Noncategorical	Yes	5/3/2008	No	1	46	0	0	0	12	Compliant
St. Joseph Regional	8062-01	Noncategorical	Yes	5/2/2008	No	1	6	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	3	0	0	0	30	Compliant
Craighead Cleaners Inc.	7218-04	Noncategorical	Yes	4/3/2008	No	1	5	0	0	0	12	Compliant

# 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, 2010 December 31, 2010  
(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>0/6</u>
6. Rate of Significant Noncompliance For all SIUs Categorical and Noncategorical.....	<u>0/9</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>23</u>	<u>58</u>
4. No. of Facilities Inspected Nonsampling.....	<u>3</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>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>



	<u>Categorical</u>	<u>Noncategorical</u>
6. No. of Significant Violators (Attach newspaper publication).....	0	0
7. Amount of Penalties Collected (total dollars IUs assessed).....	0	0
8. Other Actions (sewer bans, etc).....	0	0

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: *Dennis T. Brown*

Title: *Pretreatment Coordinator* Date: *24 Jan 11*

# PPS Program Report

\* NPDES ID: AR0033880

Permittee's Name Hot Springs

\* Report Received/Event Date: 1-27-2011

Date 1-31-2011

## 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: 01/01/2010

### 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: 0
- SIUs in SNC with Reporting Requirements: 0
- SIUs in SNC with Pretreatment Schedule: 0
- SIUs in SNC Published in Newspaper: 0
- 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: \_\_\_\_\_
  - Date of Most Recent Adoption of Technically Based Local Limits: \_\_\_\_\_
  - 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: \_\_\_\_\_