

Wilson, Tabatha

From: Gilliam, Allen
Sent: Wednesday, February 12, 2014 12:35 PM
To: dbrunson@cityhs.net
Cc: Fuller, Kim; Wilson, Tabatha; Ramsey, David; Kaelin, Cynthia; Uyeda, Craig; Anderson, Alan
Subject: AR0033880_Hot Springs Feb 2014 annual Pretreatment report and ADEQ reply_20140212
Attachments: Hot Springs Jan 2014 Annual Report.pdf; Pretreatment Attachments '12.doc

Dennis,

Hot Springs' February 2014 annual Pretreatment report (attached) was received on 2/5/14, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i). There are no further actions deemed necessary at this time.

The preferred annual report form is also attached. Some of your report sheets have been modified deviating from this EPA (original) format. Separation of the influent/effluent results may be more difficult to accurately enter into the NPDES database without the dividing lines and the "WQ level/limit" column's units should reflect ug/l.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

AXJNTAG



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

January 30, 2014

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

FEB 6 2014

12212 TW

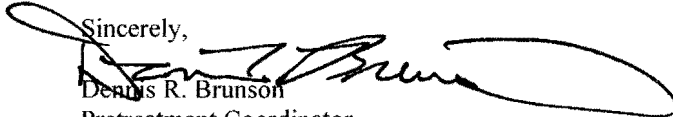
Re: Pretreatment Performance Summary (PPS)

Dear Mr. Gilliam,

Please find enclosed the City of Hot Springs Municipal Utilities' 2013 performance summary.

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

Sincerely,


Dennis R. Brunson
Pretreatment Coordinator

Enclosure

C: James Sorrells, Facilities Operations Manager
Bill Burrough, Deputy City Manager

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, 2013 December 31, 2013
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs: 3

Total Number of Noncategorical IUs: 1

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>Noncategorical</u>
1. No. of SIUs Submitting BMRS/Total No Required.....	<u>0/0</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 Semi-annual 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>

SIU Compliance (cont.)

	<u>Categorical</u>	<u>Noncategorical</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

1. No. of Control Documents Issued/ Total No. Required.....	<u>3</u>	<u>1</u>
2. No. of Nonsampling Inspections Conducted.....	<u>3</u>	<u>1</u>
3. No. of Sampling Visit Conducted.....	<u>23</u>	<u>8</u>
4. No. of Facilities Inspected Nonsampling.....	<u>3</u>	<u>1</u>
5. No. of Facilities Sampled.....	<u>3</u>	<u>1</u>

IV. Enforcement Actions

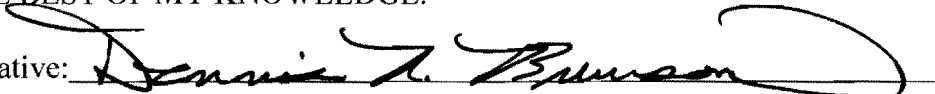
SIGNIFICANT INDUSTRIAL USERS

	<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>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).....	<u>0</u>	<u>0</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: Pre-treatment Coordinator Date: 30 Jan 14

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					90-Day Comp	Semi Annual	Self Monitoring	
Mid-America Distillations, Inc.	2869	Categorical	Yes	3/2/2011	No	1	8	0	0	0	25	Compliant
Triumph Fabrications Hot Springs	3471-02	Categorical	Yes	7/2/2011	No	1	7	0	0	0	129	Compliant
Alliance Rubber Co.	3069-02	Noncategorical	Yes	3/1/2011	No	1	8	0	0	0	45	Compliant
Triumph Airborne Structures, Inc.	3471-02	Categorical	Yes	8/2/2011	No	1	8	0	0	0	25	Compliant

MONITORING RESULTS FOR

REPORTING YEAR: 1 Jan 11 thru 31 Dec 11
 AVERAGE POTW FLOW: 11.35 MGD

TREATMENT PLANT: City of Hot Springs Municipal Utilities
 % IU FLOW: 4.20%

NPDES PERMIT: AROO33880

Metals, Cyanide and Phenols	MAHL ug/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
		3/17/2013 ug/l	5/19/2013 ug/l	8/11/2013 ug/l	11/24/2013 ug/l		3/17/2013 ug/l	5/19/2013 ug/l	8/11/2013 ug/l	11/24/2013 ug/l			
T Antimony	N/A	0	0	5	0	N/A	0	0	0	0	60	EPA 200.8	60 ug/l
T Arsenic	11.77	0.67	1	1	0.82	N/A	0	0	0	0.58	0.5	EPA 200.8	0.5 ug/l
T Beryllium	20.38	0	0	0	0	N/A	0	0	0	0	0.5	EPA 200.8	0.5 ug/l
T Cadmium	8.96	0	0.54	1.3	0	0.023	0	0	0.64	0	0.5	EPA 200.8	0.5 ug/l
T Chromium	258.41	0	12	0	0	8.18	0	0	0	0	10	EPA 200.8	10 ug/l
T Copper	131.11	46	45	30	21	0.45	5.2	5.7	5.3	6.3	0.5	EPA 200.8	0.5 ug/l
T Lead	11.59	3	6.6	1.6	1.8	0.034	0	0.74	0.67	0	0.5	EPA 200.8	0.5 ug/l
T Mercury	0.06	0.033	0.037	0.032	0.046	0.0005	0.0063	0.0042	0	0.0034	0.005	EPA 245.7	0.018 ug/l
T Molybdenum	10.59	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	70.63	4.2	4.1	3.2	3.6	0.78	3.1	4.6	3.9	2.6	0.5	EPA 200.8	0.5 ug/l
T Selenium	14.13	0	0	0	0	N/A	0	0	0	0	5	EPA 200.8	5 ug/l
T Silver	6.2	0	1.3	1.9	0	0.006	0	1	0	0	0.5	EPA 200.8	0.5 ug/l
T Thallium	N/A	0	0.9	0	0	N/A	0	0	0	0	0.5	EPA 200.8	0.5 ug/l
T Zinc	688.68	100	110	63	68		36	34	23	23	20	EPA 200.8	20 ug/l
T Cyanide	32.25	0	0	0	0	0.07	0	0	0	0	10	EPA 335.2	10 ug/l
T Phenols	N/A	110	58	68	22	N/A	0	58	36	7.5	5	EPA 420.1	5 ug/l
Flow, MGD		9.53	8.76	9.28	15.5		9.94	8.81	10.78	11.38			
				Influent		Effluent							
Bis(2-ethylhexyl)phthalate		3/3/2013		100		40						EPA 625	10 ug/l
Flow, MGD				11.14		11.34							

(1). It is advised that the influent and effluent samples are collected considering flow detention time through each plant. Analytical MQLs should be used sothat the data can also be used for local limits assesement and NPDES application purpose.

(2). Record the name of any poilutants [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

SIGNIFICANT NONCOMPLIANCE USER-ENFORCEMENT ACTION TAKEN

Industrial User	Nature of Violation		Number of Actions Taken					Compliance Schedule			Comments	
			Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other	Penalties Collected		Date Issued
None	None	None	None	None	None	None	None	None				

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.**

(2) This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration

WQ - "Water Quality Levels not to exceed" OR actual permit limit.

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				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	

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 _____

Address _____

City _____ State/Zip _____

Contact Person _____ Position _____

Contact Telephone _____ NPDES Permit Nos. _____

Reporting Period _____
 (Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs _____

Total Number of Significant Noncategorical IUs _____

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

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>N/A*</u>
2) No. of SIUs Submitting 90-Day Compliance Reports/No. Required.	/	<u>N/A*</u>
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required.	/	/
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule	/	/
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs	/	/
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .		_____

III. Compliance Monitoring Program

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

1) No. of Control Documents Issued/Total No. Required.	/	/
2) No. of Nonsampling Inspections Conducted.	/	/
3) No. of Sampling Visits Conducted.	/	/
4) No. of Facilities Inspected (nonsampling)	/	/
5) No. of Facilities Sampled	/	/

IV. Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

1) No. of Compliance Schedules Issued/No. of Schedules Required	/	/
2) No. of Notices of Violations Issued to SIUs	_____	_____
3) No. of Administrative Orders Issued to SIUs	_____	_____
4) No. of Civil Suits Filed.	_____	_____
5) No. of Criminal Suits Filed	_____	_____
6) No. of Significant Violators (attach newspaper publication).	_____	_____
7) Amount of Penalties (not surcharges) Collected (total dollars/IUs assessed)	/	/
8) Other Actions (sewer bans, etc.).	_____	_____

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 _____
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