

## Gage, Hannah

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**From:** Gilliam, Allen  
**Sent:** Tuesday, September 13, 2016 1:56 PM  
**To:** Gage, Hannah  
**Cc:** Leamons, Bryan  
**Subject:** AR0036498\_Bentons Oct 2009 TBLL Eval spreadsheets\_20101226  
**Attachments:** benton TBLL 10-09.xls

Hannah,

Can you open each "tab" (don't need NH3) at the bottom to make a total of 5 spreadsheets showing up as pdfs?

I'm cleaning out my D drive and need to place some of the docs on the website. More to come.

Allen g

[Ps: yes, just include the below text along with the spreadsheets. E/NPDES/NPDES/Pretreatment/Reports ↓](#)

**From:** Gilliam, Allen  
**Sent:** Tuesday, October 30, 2012 11:27 AM  
**To:** benton jonathan buff  
**Subject:** AR0036498\_Bentons Oct 2009 TBLL development and spreadsheets\_20101226

Jonathan,

Find attached the spreadsheets sent to Terry back in '09. The "local limits" tab at the bottom will show the maximum allowable headworks/max allowable industrial loadings (MAHLs/MAILs). Obviously both will change slightly on a daily basis and you may see that your SIU (significant industrial user) and domestic flows have already changed from what I used back in '09 (see "PPS\_Scan" tab), but the MAHLs/MAILs are meant to be based on an averaging scheme over time.

All information used in these spreadsheets' calculations were site specific provided by Terry. For those pollutants reported as ND per EPA guidance, one can either use the ND value, ½ the ND value or 0.0 mg/l. You'll see my notes regarding these on a couple of the tabbed spreadsheets. ½ the ND level is the most widely used (see "Domestic" tab info for instance).

These spreadsheets are what most (if not all Pretreatment) cities in the state are "concurring" with as our Pretreatment staff is following EPA's guidance for developing local limits and our own continuing planning process (CPP) which goes into detail developing WQ based permit limits.

From the MAILs, it is up to the City to decide if they even need local limits. At least you'll have a max. allowable industrial loading to allocate to suspect industries/businesses discharging higher than domestic background concentrations.

I'll let you ponder the spreadsheets for a while. Once you have an idea on what the numbers might mean, we can then have some more in-depth conversations whether Benton actually needs "local limits" (an allocation of the MAILs) for any of its industries/businesses.

I'm unsure of your present significant industry make-up at this time. Have you conducted a comprehensive industrial user survey recently to discover who you might consider "significant"?

Please call when you've had a chance to review what I sent Terry several years ago.

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

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**From:** Jonathan W. Buff [<mailto:jwbuff@bentonar.org>]  
**Sent:** Thursday, October 25, 2012 5:02 PM  
**To:** Gilliam, Allen  
**Subject:** Developing Local Limits

Mr. Gilliam,

I writing this to ask for your help. Some time back we had discussed local limits, you had indicated that you had helped previous manager develop. I indicated then that I could not find any information on what was developed. I do not know how much this may change with plant expansion and whether this was done prior to most recent expansion back in 2008. I would like your help in developing local limits for the plant. I will be reading at length the EPA Local Limits Development Guidance manual. If you can help me with this I would greatly appreciate it.

Kindest regards,

**Jonathan Buff**  
Wastewater Treatment Manager  
Benton Utilities  
Benton, AR 72015  
Phone: 501-776-5982  
Fax: 501-776-5974

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**WQ Levels not exceed for Benton 10/09**

Aquatic Life  
AML, ug/l

Cadmium Total	2.50
Chromium (hex)	11.81
Copper Total	15.49
Lead Total	5.19
Mercury Total	0.01
Nickel Total	166.66
Selenium Total	5.58
Silver Total	2.16
Zinc Total	146.53
Chromium (Tri)	458.06
Cyanide Total	5.80
Beryllium Total	5.91
Arsenic	373.31

**Benton 10/09**

Pollutant	% Rem***	Water Quality		Sludge		Inhibition**		MAHL	MAHC	Domestic Allocation for %SF		MAIL	Max Inf Exceeded	Max Effluent
		mg/l	lbs/day	mg/kg	lbs/day	mg/l	lbs/day	lbs/day	mg/l	lbs/day	lbs/day^	lbs/day	MAHC	vs WQS(mg/l)
Cadmium Total	83	0.0025	0.7853	85	1.54	1.00	53.38	0.785	0.01471	0.13	0.667	0.538	No	No
Copper Total	83	0.0155	4.8643	4300	77.71	1.00	53.38	4.864	0.09113	0.95	4.135	3.183	0.1800	No
Lead Total	61	0.0052	0.7102	840	20.66	1.00	53.38	0.710	0.01331	0.09	0.604	0.517	0.0390	No
Mercury Total	89	0.00001	0.0065	57	0.96	0.10	5.34	0.006	0.00012	0.0052	0.006	0.00035	0.0001	No
Nickel Total	45	0.1667	16.1741	420	14.00	1.00	53.38	14.000	0.26229	0.28	11.900	11.616	No	No
Selenium Total	47	0.0056	0.5620	100	3.19	0.20	10.68	0.562	0.01053	0.19	0.478	0.293	No	No
Silver Total	75	0.0022	0.4606	0	0.00	0.25	13.34	0.461	0.00863	0.07	0.392	0.326	No	No
Zinc Total	67	0.1465	23.7002	7500	167.91	0.50	26.69	23.700	0.44402	4.55	20.145	15.595	No	No
Chromium Tota	82	0.4581	135.8313	3000	54.88	1.00	53.38	53.376	1.00000	0.26	45.370	45.111	No	No
Cyanide Total	69	0.0058	0.9992	0	0.00	0.10	5.34	0.999	0.01872	0.26	0.849	0.591	No	No
Arsenic	45	0.3733	36.2288	75	2.50	0.10	5.34	2.500	0.04684	0.13	2.125	1.996	No	No
Molybdenum	50	0.0000	0.0000	75	2.25	0.20	10.68	2.250	0.04215	0.21	1.913	1.706	No	No
Beryllium	50	0.005915	0.6314	0	0.00	0.10	5.34	0.6314	0.01183	0.01	0.537	0.524	No	No

yellow denotes the MAHL/MAIL driving criteria

Dry tons/day of sludge 7.50 Safety Factor 0.15

\* lbs/day = mg/l \* 8.34 \* average flow / (1-%Rem)

\*\* Page 3-44 of EPA Guidance Mtrl. (Be est. @ 0.10 mg/l)

\*\*\* EPA Default Numbers from page 3-56 of TBLL guidance manual used for Pb, Cr, CN & Ar (Mo & Be est. @ 50%)

\*\*\*\* lbs/day = dry tons/day \* 0.002 \* CFR 503 criteria/ % removal from EPA Pret. Prog. Implementation workshop mtrl. ~ 6/93

++ lbs/day = mg/l \* Flow \* 8.34

^ lbs/day = (1 - SF) X MAHL

MAIL = Maximum allowable industrial loading = MAHL - Allocation for % SF - Domestic lb/day



