

## Gage, Hannah

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**From:** Gilliam, Allen  
**Sent:** Friday, April 22, 2016 1:45 PM  
**To:** 'conway trey lieblong'  
**Cc:** Gage, Hannah; Leamons, Bryan; Barber, Kyle; Ramsey, David; Kaelin, Cynthia  
**Subject:** AR0051951\_Conway AR0047279 April 2016 annual Pretreatment Program report\_20160422  
**Attachments:** Conway's April 2016 Pret. Program Report.PDF; Pretreatment Attachments (annual report) '14.doc

Trey,

Conway Corporation's April 2016 annual Pretreatment Program report was received, reviewed, deemed complete and compliant with the reporting requirements per 40 CFR 403.12(i).

Attachment A, 3<sup>rd</sup> column ("Categorical Determination") should list the actual CFRs (433, e.g.) the industry is subject to (Pretreatment Standards only), not "C" or "NC".

Attachment B is meant to list Conway's industries in significant non-compliance (SNC) during the City's reporting year, not those who have just been non-compliant (NC).

In the future, please use the above (2<sup>nd</sup>) attachment which has been sent out several times in the recent past to all the Pretreatment Cities in the State.

Also, please be prepared to revise/submit your maximum allowable industrial loadings (MAILs)/possible technically based local limits (TBLLs) for the Tupelo Bayou Plant. You have had ample time to prepare a sampling plan and gather requisite analyticals per EPA guidance for this exercise since the plant became steady state well over a year ago. This will be a requirement in the upcoming Audit of Conway's Pretreatment Program, but should have already been accomplished.

You have also been provided with this agency's MS Excel spreadsheets to expedite calculations for the above required numbers.

Thank you for your timely report. If you have any further questions or comments please feel free to contact this office.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

E/NPDES/NPDES/Pretreatment Reports



**Conway**  
Corporation

April 14, 2016

Mrs. Deborah Gerst  
NPDES Enforcement Section  
Ark. Dept. of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72218-5317

Re: The City of Conway's Annual Pretreatment Report for 2015- NPDES Permits #  
AR0051951 and # AR0047279

Dear Mrs. Gerst:

Enclosed are copies of the City of Conway's Pretreatment Performance Summary for 2015, monitoring result forms, and significant non-compliance notice published in the Log Cabin Democrat and proof of publication of said notice.

As noted in the enclosed report, we had one industry that met EPA's definition of being in significant non-compliance of their wastewater effluent limits. Conway Corporation is working diligently with this industry to bring them into compliance.

If you have any questions, please let me know.

Yours truly,  
Conway Corporation

  
Trey Lieblong  
Environmental Coordinator

CC: Allen Gilliam, NPDES Pretreatment Coordinator





(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	SIC Code	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (C, NC, or SNC)				Permit Limits
			Y/N	Last Action				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	
Southern E-Coating	3479	C	Y	Aug 12	N	1	12	N/A	N/A	N/A	N/A	C
Conway Reg. Med. Center	8062	NC	N		N	1	1	N/A	N/A	N/A	N/A	n/a
Wonder State Box Company	2653	NC	Y	Aug 12	N	1	5	N/A	N/A	N/A	N/A	NC
Arkansas Box Company	2653	NC	Y	Aug 12	N	1	4	N/A	N/A	N/A	N/A	C
Valley Plating	3471	C	Y	Aug 12	N	1	12	N/A	N/A	N/A	N/A	C
Age Industries	2653	NC	Y	Aug 12	N	1	5	N/A	N/A	N/A	N/A	SNC
Central Arkansas Dust Control	7218	NC	Y	Nov 13	N	1	5	N/A	N/A	N/A	N/A	C

\*\* Detco has had a sewer ban placed on them since October of 2005

\*\*\*\* Conway Corporation performs all effluent monitoring

**PERMIT LIMIT NON COMPLIANCE WERE AS FOLLOWS:**

Wonder State Box one month for monthly average on Copper.  
AGE Industries one month for daily max and monthly average on Copper.





**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 DEPARTMENT AUTHORIZATION.

I. General Information

Control Authority Name Conway Corporation

Address 1307 PRAIRIE STREET (P.O.BOX 99)

City CONWAY State/Zip ARKANSAS, 72033

Contact Person TREY LIEBLONG Position ENVIRONMENTAL COORDINATOR

Contact Telephone 501-548-3040 NPDES Permit Nos. AR0051951,AR0047279

Reporting Period January 1, 2015 December 31, 2015  
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 7

Total Number of Significant Noncategorical IUs 10\*\*\*\*\*

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>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 Semiannual 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>
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs . . . . .	<u>0 / 7</u>	<u>1 / 11</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .		<u>1/18</u>

III. Compliance Monitoring Program

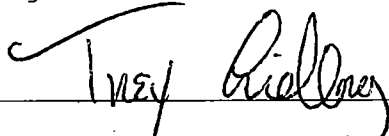
	SIGNIFICANT INDUSTRIAL USERS	
	Categorical	NonCategorical
1) No. of Control Documents Issued/Total No. Required. . . . .	<u>7 / 7</u>	<u>11 / 11</u>
2) No. of Nonsampling Inspections Conducted. . . . .	<u>7 / 7</u>	<u>11 / 11</u>
3) No. of Sampling Visits Conducted. . . . .	<u>75 / 75</u>	<u>34 / 34</u>
4) No. of Facilities Inspected (nonsampling) . . . . .	<u>7 / 7</u>	<u>11 / 11</u>
5) No. of Facilities Sampled . . . . .	<u>6 / 7**</u>	<u>11 / 11</u>

IV. Enforcement Actions

	SIGNIFICANT INDUSTRIAL USERS	
	Categorical	NonCategorical
1) No. of Compliance Schedules Issued/No. of Schedules Required . . . . .	<u>0 / 0</u>	<u>0 / 0</u>
2) No. of Notices of Violations Issued to SIUs	<u>0</u>	<u>2</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>
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 / 0</u>	<u>0 / 0</u>
8) Other Actions (sewer bans, etc.). . . . .	<u>1</u>	<u>1</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

Date 4/14/16

# thecabin.net

Log Cabin Democrat

## PROOF OF PUBLICATION

RI/

STATE OF ARKANSAS  
COUNTY OF FAULKNER

Account No. 1000701592

CONWAY CORPORATION  
1319 PRAIRIE ST  
CONWAY 72033 USA

I, Chealsey Mosby do hereby certify that I am the Authorized Agent of the Log Cabin Democrat published in the city of Conway, Arkansas, and having a bonafide circulation in Faulkner County, said newspaper has been published at regular intervals continuously during a period of at least

Prior to the date of publication of the annexed .....

Public Notice

and is in all respects eligible and qualified to publish legal notices under the provisions of Act 1 of the General Assembly of the State of Arkansas as amended by act 263 of the 1937 Acts of the State of Arkansas.

I further certify that said legal advertisement, a copy of which is hereby attached, was published for

.....!..... insertions on the following days, to-wit:

Section / Ad #	Run Date	Page Placement
LEGAL NOTICES		
7000051546-01	4/4/2016	
	4/4/2016	B8 4
		2

AFFIANT: *Chealsey Mosby*

Subscribed and sworn to this 4<sup>th</sup> day of April, 2016

Notary Public

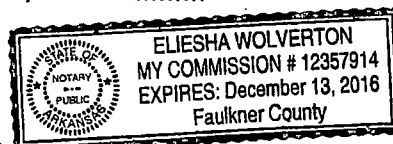
*Eliesha Wolvertson*

My commission expires December 13, 2016

Fees for Printing, \$ 125.25

Cost of Proof, \$ 0

Total, \$ 125.25



### PUBLIC NOTICE OF SIGNIFICANT NONCOMPLIANCE OF THE CITY OF CONWAY'S INDUSTRIAL PRETREATMENT PROGRAM REGULATIONS

CONW

Under the Provisions of 40 CFR 403.8 (f) (VII), enforcement of National Pretreatment Standards and the City of Conway's Industrial Pretreatment Ordinance No. O-12-08, the public is hereby notified that during 2015 the following industry was in significant noncompliance with EPA pretreatment and requirements as specified below.

INDUSTRY: AGE INDUSTRIES

ADDRESS: 410 COMMERCE ROAD, CONWAY, AR 72032

INDUSTRY OFFICIAL: MR. JIMMY TOAL, TITLE: GENERAL MANAGER

SIC NUMBER: 2651  
PRODUCT: CORRUGATED SHIPPING BOXES

NATURE OF VIOLATION(S): THE WASTEWATER EFFLUENT EXCEEDED THE MAXIMUM DAILY CONCENTRATION FOR COPPER TWO TIMES AND MONTHLY AVERAGE CONCENTRATION FOR COPPER ONE TIME IN 2015.

DATE OF OCCURRENCE: JUNE OF 2015

APPLICABLE ORDINANCE: CONWAY CITY ORDINANCE NO. O-12-08

ENFORCEMENT ACTION TAKEN: AGE INDUSTRIES COMPANY WAS NOTIFIED IN WRITING OF THE VIOLATIONS, AND A CORRECTIVE ACTION PLAN WAS REQUESTED AND RECEIVED

COMMENTS: WHILE AGE INDUSTRIES WERE IN SIGNIFICANT NONCOMPLIANCE, THEIR WASTEWATER EFFLUENT DID NOT CAUSE ANY PROBLEMS FOR THE CITY'S WASTEWATER TREATMENT FACILITY.

DATE: 3-31-16  
Trey Lieblong  
Environmental Coordinator



(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 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, day and Year) (Ending Month, day 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

SIGNIFICANT INDUSTRIAL USERS  
Categorical      NonCategorical

1) No. of SIUs Submitting BMRs/Total		
No. Required. . . . .	/	N/A*
2) No. of SIUs Submitting 90-Day Compliance		
Reports / No. Required. . . . .	/	N/A*
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



	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued / Total No. Required. . . . .	/	/
2) No. of Non-sampling Inspections Conducted / Total No. Required. . . . .	/	/
3) No. of Sampling Visits Conducted / Total No. Required. . . . .	/	/
4) No. of Facilities Inspected (nonsampling) / Total No. Required. . . . .	/	/
5) No. of Facilities Sampled / Total No. Required. . . . .	/	/

IV. Enforcement Actions

	<u>SIGNIFICANT Categorical</u>	<u>INDUSTRIAL USERS NonCategorical</u>
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 \_\_\_\_\_