Peltier, Hannah

From: Gilliam, Allen

Sent: Monday, June 01, 2015 11:04 AM

To: conway trey lieblong; conway tommy shackelford

Cc: Peltier, Hannah; Ramsey, David; McDonald, Scott; Johnson, Miles; Healey, Richard;

Kaelin, Cynthia

Subject: AR0051951_Conway Corps AR0033359 AR0047279 April 2015 annual Pretreatment

report 20150601

Attachments: AR0051951_Conway April 2015 Annual Pretreatment Report_20150515.pdf

Trey,

Conway Corporation's annual Pretreatment report was received 4/24/15 (attached), reviewed, corrections made/initialed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i). This report covers all three (3) City Corp. NPDES permit requirements.

It has been noted the Stone Dam Creek POTW has been shut down and its permit (AR0033359) has been terminated, effective 11/6/14.

A requirement which you'll find in the next Tupelo Bayou's NPDES permit will state, "The permittee shall submit, within sixty (60) days of the effective date of this permit, (1) a WRITTEN CERTIFICATION that a technical evaluation has demonstrated that the existing technically based local limits (TBLL) are based on current state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment facility, worker health and safety problems, and sludge contamination, (2) a WRITTEN NOTIFICATION that a technical evaluation revising the current TBLL will be submitted within 12 months of the effective date of this permit."

Tupelo Bayou's NPDES expires about a year and a half from now on 1/31/17. It may be a good time to begin gathering domestic/light commercial background information for a re-evaluation of your Maximum Allowable Headworks/Maximum Allowable Industrial Loadings (MAHL/MAIL) and to determine if technically based local limits (TBLLs) are necessary. Preferably six samples over a six month period is requested for most representative samples.

[Note: The current inf/eff summary charts' "MAHC" and "WQ level/limit" columns are no longer applicable {leave blank} until Tupelo Bayou's new ones are determined]

Due to the recent rainfall and associated I&I, you will probably want to wait until your remaining collection system returns to steady state.

Once domestic/light commercial testing begins, it's advised to use the most sensitive methods for all the metals including the recommendation to use the analytical method 1631E on the grab samples for Hg using clean hand/dirty hands, double glove/double bag common sense clean sampling techniques.

However, if the Tucker Creek POTW's influent does not receive any significant users' wastewater, would you consider its influent representative of the entire City's domestic/light commercial wastewater?

Thank you for your timely report and consideration in gathering information to support a valid MAHL/MAIL/TBLL evaluation at your new Tupelo Bayou POTW.

Sincerely,

Allen Gilliam ADEQ State Pretreatment Coordinator 501.682.0625

E/NPDES/NPDES/Pretreatment/Reports



April 22, 2015

Mr. Allen Gilliam NPDES Pretreatment Coordinator Ark. Dept. of Environmental Quality 5301 Northshore Drive North Little Rock, Arkansas 72218-5317

corrections made

Ho

Stone Dam Potwishut

Re: The City of Conway's Annual Pretreatment Report for 2014- NPDES Permits # AR0033359) # AR0047279 and # AR0051951

Dear Mr. Gilliam:

Enclosed are copies of the City of Conway's Pretreatment Performance Summary for 2014, monitoring result forms.

As noted in the enclosed report, none of our permitted industries met EPA's definition of being in significant non-compliance of their wastewater effluent limits. Conway Corporation is working diligently with our industries to continue this compliance.

If you have any questions, please let me know.

Yours truly,

Conway Corporation

Trey Leblong

Environmental Coordinator

CC: Deborah Gerst, NPDES Enforcement

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: January 1, 2014 TO December 31, 2014

TREATMENT PLANT: City of Conway Tupelo Bayou WWTP

AVERAGE POTW FLOW: 3.967MGD % IU FLOW: 11.6%

METALS,	манс		INFLUENT DA	ATES SAMPLE	ED	WQ level/ limit (µg/l) (2)	E		ATES SAMPLI	LABORATORY ANALYSIS			
CYANIDE and PHENOLS	(Total) (μg/l) (2)		Once	/quarter				Once	/quarter		EPA MQL	EPA Method	Detection Level
	(-,	Date	Date	Date	Date	(2)	Date	Date	Date	Date	(μg/l) (1)	Used (1)	Achieved (μg/l)
					12/15/14				8/27/14	12/15/14			
Antimony	N/A				<60	N/A			<60	<60	60	200.8	60
Cadmium	1.000				<.5	4.4263			<0.5	<0.5	0.5	200.8	0.1
Copper	1.000				39	3.2515			7.5	11.0	0.5	200.8	6
Lead	1.000				2.7	3.3117			1.8	<0.5	0.5	200.8	11
Mercury	0.0929				<0.2	0.0929			<0.2	<0.2	.005	245.7	.0018
Nickel	1.000				6.6	17.981			4.1	3.6	0.5	200.8	10
Selenium	N/A				<5	N/A			<5	<5	5	200.8	2
Silver	0.2500				0.65	0.332			0.75	<0.5	0.5	200.8	.2
Zinc	0.3000				130	18.831			25	46	20	200.8	20
Chromium	1.000				<10	222.2			<10	<10	10	200.8	10
Cyanide	0.1000				<10	2.7438			<0.01	<0.01	0.01	SM4500C N C,E	0.01
Arsenic	0.1000				1.6	1027			1.2	0.79	0.5	200.8	.5
Molybdenum	N/A				<8	N/A			<8	<8		200.8	8
Phenols	N/A				.10	N/A			0.056	<0.005	5_	200.8	5
Beryllium	N/A				<0.5	N/A			<.5	<.5	0.5	200.8	.5
Thallium	N/A				<0.5	N/A			<0.5	<0.5	0.5	200.8	.5
Flow, MGD	N/A				6.869	N/A			3.085	6.682			
(3)													
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MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: January 1, 2014 TO December 31, 2014

TREATMENT PLANT: City of Conway Tucker Creek WWTP NPDES PERMIT # AR0047279

AVERAGE POTW FLOW: 5.092 MGD % IU FLOW: 0 %

METALS, CYANIDE and	MAHC (Total)	1	(μ	ATES SAMPLE 1g/l) /quarter	D	WQ level/	E	FFLUENT DA (щ Once/e	g/l)	LABORATORY ANALYSIS			
PHENOLS	(μg/l) (2)		Once/	quarter		limit (µg/l) (2)		Once			EPA MQL	EPA Method	Detection Level
	(=)	Date	Date	Date	Date	(2)	Date	Date	Date	Date	(μg/l) (1)	Used (1)	Achieved (µg/l)
		3/11/14	5/21/14	7/7/14	12/15/14		3/11/14	5/21/14	7/7/14	12/15/14	` ′		
Antimony	N/A	<60	<60	<60	<60	N/A	<60	<60	<60	<60	60	200.8	60
Cadmium	1.000	<.5	<.5	<.5	<.5	4.4263	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.1
Copper	1,000	35	22	39	26	3.2515	10	7.8	5.4	9.2	0.5	200.8	6
Lead	1.000	1.6	.85	.88	1.0	3.3117	<0.5	<0.5	<0.5	0.56	0.5	200.8	l
Mercury	0.0929	<0.2	<0.2	<0.2	<0.2	0.0929	<0.2	0.0060	<0.2	<0.2	.005	245.7	.0018
Nickel	1.000	4.6	3.9	3.5	4.0	17.981	3.2	3.5	3.3	3.4	0.5	200.8	10
Selenium	N/A	<5	<5	<5	<5	N/A	<5	<5	<5	<5	5	200.8	2
Silver	0.2500	<0.5	<0.5	0.52	<0.5	0.332	<0.5	<0.5	<0.5	<0.5	0.5	200.8	.2
Zinc	0.3000	110	150	87	96	18.831	37	21	<20	42	20	200.8	20
Chromium	1.000	<10	<10	<10	<10	222.2	<10	<10	<10	<10	10	200.8	10
Cyanide	0.1000	<10	<10	<10	<10	2.7438	<0.01	<0.01	<0.01	<0.01	0.01	SM4500C N C,E	0.01
Arsenic	0.1000	1.3	10	1.2	1.1	1027	0.77	4.8	1.2	1.0	0.5	200.8	.5
Molybdenum	N/A	<8	<8	45	<8	N/A	<8	<8	<8	<8		200.8	8
Phenols	N/A	0.054	.032	.051	.041	N/A	0.024	0.014	0.0096	<0.005	5	200.8	5
Beryllium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<.5	<,5	<.5	<.5	0.5	200.8	.5
Thallium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	0.5	200.8	.5
Flow, MGD	N/A	4.548	3.986	2.643	2.692	N/A	8.466	11.225	4.153	3.536			
(3)													
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MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT REPORTING YEAR: <u>January 1</u>, <u>2014</u> TO <u>December 31</u>, <u>2014</u>

TREATMENT PLANT: City of Conway Stone Dam Plant NPDES PERMIT #AR0033359

shutdown 9/15/15/14permit ferminated

AVERAGE POTW FLOW: 3.894 MGD % IU FLOW: 11.83 %

METALS, CYANIDE and	манс	1	INFLUENT DA	TES SAMPLE	D	WQ level/ limit	E	FFLUENT DA		LABORATORY ANALYSIS			
PHENOLS (Total)	mg/l (2)			quarter		mg/l (2)	(μg/l) Once/quarter				EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
Antimony	N/A	3/11/14 <60	5/21/14 <60	7/7/14 <60	8/27/14 <60	N/A	3/11/14 <60	5/21/14 <60	7/7/14 <60	8/27/14 <60	60	200.8	60
Cadmium	0.00677	<0.5	<0.5	<0.5	<0.5	0.0053	<0.5	<0.5	<0.5	<0.5	0.5	200.8	.5
Copper	0.01239	15	57	59	76	0.0321	13.0	6.3	6.2	9.0	0.5	200.8	.5
Lead	0.01124	2.3	3.0	2.4	2.9	0.005	0.50	<0.5	<0.5	0.51	0.5	200.8	.5
Mercury	0.00018	<0.02	<0.02	<0.02	<0.02	0.00009	< 0.02	0.0042	<0.02	<0.02	.005	245,2	.005
Nickel	0.32564	7.0	9.0	9.9	12.0	<0.01	6.4	5.3	3.5	10.0	0.5	200.8	.5
Selenium	N/A	<5	<5	<5	<5	N/A	<5	<5	<5	<5	5	200.8	5
Silver	.00422	<0.5	0.53	<0.5	<0.5	0.0016	<0.5	<0.5	<0.5	<0.5	0.5	200.8	.5
Zinc	0.37477	130	130	110	220	0.2972	58	30	37	52	20	200.8	20
Chromium	1.06151	<10	<10	<10	<10	1.0654	<10	<10	<10	<10	10	200.8	10
Cyanide	0.02566	<10	<10	<10	<10	0.0116	<10	<10	<10	<10	10	SM4500C N C,E	10
Arsenic	0.00677	1.3	1.3	1.5	1.4	0.7742	0.76	5.3	1.0	.97	0.5	200.8	.5
Molybdenum	N/A	13	<8	<8	<8	N/A	<8	<8	<8	<8		200.8	8
Phenols	N/A	0.037	0.040	0.042	0.045	N/A	0.038	<.005	<.005	0.014	5	420.1	5
Beryllium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	0.5	200.8	.5
Thallium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	0.5	200.8	.5
Flow, MGD	N/A	3.923	4.201	3.217	2.859	N/A	3.987	4.267	3.403	2.846			
(3)													
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- (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 ADEQ Pretreatment staff Excel spreadsheets.
- (3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity at which they were detected.

MAHL - Maximum Allowable Headworks Level

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

ATTACHMENT A

PRETREATMENT PROGRAM STATUS REPORT UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

		Categorical Determination	Control					Co	ompliance Stat	us (C, NC	, or SNC)	
Industrial User	SIC Code		Doo	cument	New User	Times Inspected	Times Sampled		Re	ports	, , , , , , , , , , , , , , , , , , , ,	Permit Limits
			Y/N	Last Action				BMR	90-day Compliance	Semi Annual	Self Monitoring	
*Virco Mfg1	2531	NC	Y	8/1/12	No	1	0	N/A	N/A	N/A***	N/A***	С
Virco Mfg2	2531	CFR433C	Y	8/1/12	No	1	12	N/A	N/A	N/A***	N/A***	С
Conway Mils	2647	HO NC	Y	8/1/12	No	1	1	N/A	N/A	N/A***	N/A***	С
Rock Tenn	2651	NC	Y	8/1/12	No	1	5	N/A	N/A	N/A***	N/A***	С
Snap-On	3549 3559	NC	Y	8/1/12	No	1	1	N/A	N/A	N/A***	N/A***	С
S F I of Arkansas Plant 1	3599	NC	Y	8/1/12	No	1	1	N/A	N/A	N/A***	N/A***	С
DETCO IND.	2842	С	Y	8/1/12	No	1	0	N/A	N/A	N/A*	N/A***	C**
S F I of Arkansas Plant 2	3599	CFR 433 _C	Y	8/1/12	No	1	12	N/A	A/N	N/A***	N/A***	С
IC Corporation	3713	CFR 433	Y	8/1/12	No	1	13	N/A	N/A	N/A***	N/A***	С
International Paper CO.	2653	NC	Y	8/1/12	No	1	4	N/A	N/A	N/A***	N/A***	С
Tokusen USA	3496	CFR 433	Y	8/1/12	No	1	13	N/A	N/A	N/A***	N/A***	NC
*****Linen King	7218	NC	Y	8/1/12	No	1	5	N/A	N/A	N/A***	N/A***	С

ATTACHMENT A

PRETREATMENT PROGRAM STATUS REPORT UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User	SIC Code		Control Document		New User	Times Inspected	Times Sampled	Co	Permit Limits			
		Categorical Determination										
			Y/N	Last Action				BMR	90-day Compliance	Semi Annual	Self Monitoring	
Southern E- Coating	3479	CFR433	Y	Aug 12	N	1	12	N/A	N/A	N/A	N/A	С
Conway Reg. Med. Center	8062	NC	N		И	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	С
Arkansas Box Company	2653	NC	Y	Aug 12	N	1	4	N/A	N/A	N/A	N/A	С
Valley Plating	3471	CFR 433 AG	Y	Aug 12	N	1	13	N/A	N/A	N/A	N/A	NC
***Age Industries	2653	NC	Y	Aug 12	N	1	4	N/A	N/A	N/A	N/A	С

- * Virco Chrome Plating unit shut down in June of 2005 and Virco Wash Facility shut down in Aug 2005
- ** Detco has had a sewer ban placed on them since October of 2005
- *** AGE Ind. has had a sewer ban placed on them since October of 2005 but was reinstated in March Of 2009
- **** Conway Corporation performs all effluent monitoring
- ***** Linen King was formally Institutional Service Corporation, Linen King purchased ISC in 2007

PERMIT LIMIT NON COMPLIANCE WERE AS FOLLOWS:

Tokusen one time for zinc and Valley Plating one time for nickel

ATTACHMENT B SIGNIFICANT VIOLATIONS - ENFORCEMENT ACTIONS TAKEN

Industrial User	Nature Violat	of ion		Numbe	r of Act:	ion Taken		Penalties	Compli Sched	ance dule	Current	Comments
ingustifai osei	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other	Collected	Date Issued	Date Due	Status	
												<u> </u>
												4,,,,,

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

Cont	rol Authority Name Conway Corporation	
Addı	ess 1307 PRAIRIE STREET (P.O.BOX 99)	
City	CONWAY State/Zip ARKANSAS, 72033	
Cont	act Person TREY LIEBLONG Position ENVIRONMENTAL COORDINATOR	
Cont	act Telephone 501-548-3040 NPDES Permit Nos. AR0033359,AR0047279, AR005	L951
Repo	rting Period January 1, 2014 December 31, 2014	
	(Beginning Month and Year) (Ending Month and Year)	
Tota	l Number of Categorical IUs 7	
Tota	l Number of Significant Noncategorical IUs 10*****#	
	II. Significant Industrial User Compliance	
	SIGNIFICANT INDUSTRIAL USERS Categorical NonCategorical	
1)	No. of SIUs Submitting BMRs/Total No. Required	
2)	No. of SIUs Submitting 90-Day Compliance Reports/No. Required	
3)	No. of SIUs Submitting Semiannual Reports/ Total No. Required	0
4)	No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule 0 /0 0 0 0 0	
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

		NIFICANT INDUS	TRIAL USERS NonCategorical
1)	No. of Control Documents Issued/Total No. Required	7 /7	_11 / 11_
2)	No. of Nonsampling Inspections Conducted	7 /7	11 /11
3)	No. of Sampling Visits Conducted	74 / 74	35 /35
4)	No. of Facilities Inspected (nonsampling) .	7 / 7	11 /11
5)	No. of Facilities Sampled	6 / 7**	11 / 11
	IV. Enforcement Acti	ions	
		SIGNIFICANT Categorical	INDUSTRIAL USERS NonCategorical
1)	No. of Compliance Schedules Issued/No. of Schedules Required	0/0	0 / 0
2) 3)	No. of Notices of Violations Issued to SIUs No. of Administrative Orders Issued to SIUs		0
4)	No. of Civil Suits Filed	0	0
5)	No. of Criminal Suits Filed	0	0
6)	No. of Significant Violators (attach newspaper publication)	0	0
7)	Amount of Penalties Collected (total dollars/IUs assessed)	0 /0	0 /0
8)	Other Actions (sewer bans, etc.)		1
	following certification must be signed in or	rder for this	form to be considered
	ertify that the information contained herein my knowledge.	is complete a	and accurate to the best
	Authorized Representative	Date _	4/22/15