

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**[Note: The current inf/eff summary charts' "MAHC" and "WQ level/limit" columns are no longer applicable {leave blank} until Tupelo Bayou's new ones are determined]**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

**RECEIVED**  
APR 24 2015  
14408 KB  
corrections made  
MS  
Stone Dam POTW shut  
down. Permit terminated

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

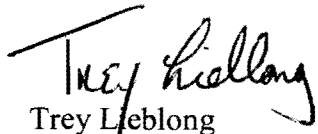
Dear Mr. Gilliam:

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







- (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**

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	CFR 433 C AB	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	C
Arkansas Box Company	2653	NC	Y	Aug 12	N	1	4	N/A	N/A	N/A	N/A	C
Valley Plating	3471	CFR 433 C AB	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	C

\* 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 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. AR0033359, AR0047279, AR0051951

Reporting Period January 1, 2014 December 31, 2014  
 (Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 7

Total Number of Significant Noncategorical IUs 10 ~~11~~ <sup>AB</sup>

II. Significant Industrial User Compliance

	SIGNIFICANT INDUSTRIAL USERS	
	Categorical	NonCategorical
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>0 / 11</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .		<u>0/18</u>

III. Compliance Monitoring Program

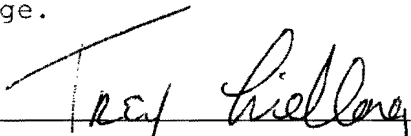
	SIGNIFICANT INDUSTRIAL USERS	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued/Total No. Required. . . . .	<u>7 / 7</u>	<u>11 / 11</u>
2) No. of Nonsampling Inspections Conducted. .	<u>7 / 7</u>	<u>11 / 11</u>
3) No. of Sampling Visits Conducted. . . . .	<u>74 / 74</u>	<u>35 / 35</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	
	<u>Categorical</u>	<u>NonCategorical</u>
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>2</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>
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 / 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 4/22/15