



## BENTONVILLE WASTEWATER UTILITIES

August 11, 2015

Ms. Jaqueline Trotta, Enforcement Analyst  
Mr. Allen Gilliam, State Pretreatment Coordinator  
Arkansas Department of Environmental Quality, Water Division  
5301 Northshore Drive  
North Little Rock, AR 72118

RE: Section B., Page 1, A., (1) of Bentonville's NPDES permit AR0022403, effective July 1, 2015

Permit Compliance Schedule; Pretreatment Requirements

Bentonville's pretreatment program currently consists of one SIU; Wal-Mart Fleet Maintenance Garage. There are currently no CIU's.

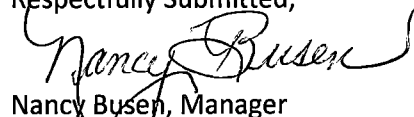
Our Pretreatment Program was updated in October 2013; Pretreatment Ordinance 2012-65 was updated August 14<sup>th</sup> 2012.

A great deal of our pretreatment time and effort are devoted to the Grease Abatement Program. We are working in conjunction with sewer rehab and maintenance to eliminate grease related SSO's.

Our latest Domestic sampling data was collected and analyzed in August 2012. To fulfill our permit obligations, more domestic sampling and analysis will be performed and submitted before the end of 2017. Please accept the attached documents to fulfill Section B., A. (1) of this permit requirement.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Respectfully Submitted,



Nancy Busen, Manager

City of Bentonville Wastewater Utilities, 1901 N.E. "A" Street, Bentonville, AR 72712  
Phone: 479-271-3160, Fax: 479-271-3163, Email: [nbusen@bentonvillear.com](mailto:nbusen@bentonvillear.com)

## **Peltier, Hannah**

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**From:** Gilliam, Allen  
**Sent:** Thursday, January 24, 2013 12:06 PM  
**To:** Nancy Busen (NBusen@bentonvillear.com)  
**Cc:** Fuller, Kim; Peltier, Hannah  
**Subject:** AR0022403\_Bentonvilles Jan 2013 ADEQ TBLL Excel Spreadsheet\_20120124  
**Attachments:** bentonville Jan 2013 tbll.xls

Nancy,

Please find attached the MS Excel spreadsheet used to calculate your "Water Quality Levels not exceed", maximum allowable headworks/maximum allowable industrial loadings.

The spreadsheet's formulas follow ADEQ's latest continuing planning process (CPP) procedures for calculating WQ based average monthly permit limits (as if Bentonville were to have them) based on the Arkansas Pollution Control and Ecology's Regulation #2 Toxics Criteria in Section 5, part 2.508 for EPA's minimum pollutants of concern.

The attached spreadsheet's first tab (PPS\_Scan) is known site specific data used in the calculations mentioned above and shown in the second tab (WQ\_Levels).

The spreadsheet's third tab (Local\_Limits) is the culmination of all calculations illustrating your maximum allowable headworks and maximum allowable industrial loadings (MAHLs/MAILs) based on the driving criteria of either WQ Levels, Sludge Criteria from 40 CFR 503 (land application of biosolids) or EPA default levels for inhibition of activated sludge wastewater treatment plants.

The remaining tabs ("Rem" [Removal efficiency across the w.w. plant] and Domestic [background concentrations]) include site specific data Bentonville supplied this office also used in the "Local Limits" calculations. The NH3 tab may be disregarded at this time.

The City may concur with and accept this office's calculated WQ levels not to exceed, MAHLs and MAILs using Bentonville's site specific information in its Pretreatment Program section entitled "Local Limits" section or secure the services of a qualified professional to create an approvable and defensible set of data.

Based on the attached spreadsheet's results it is this office's opinion that Local Limits are not necessary at this time for Bentonville as the last three (3) years' worth of influent/effluent data shows no exceedances of the MAHLs or WQ levels "not to exceed". A table of historical industrial loading data compared to the MAILs would further demonstrate local limits are currently not necessary per 40 CFR 403.8(f)(4).

Please advise this office of your intentions within 15 working days from the date on this correspondence. You have been provided standard language suggested to be used in your local limits section to complete your entire Pretreatment Program submittal to be current with the Streamlining revisions to 40 CFR 403.

As always please feel free to contact this office with any questions or concerns. I will be available to further explain the rationale behind the attached spreadsheet.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

**CALCULATIONS OF ARKANSAS WATER QUALITY-BASED EFFLUENT LIMITATIONS**

For an Arkansas River/Stream

(Reserved)

AV

AR River

**STEP 1:** INPUT TWO LETTER CODE FOR ECOREGION (Use Code at Right)  
Basin Name

**Codes & TSS for Ecoregions and Large Rivers**

**FACILITY**

Permittee & Date Bentonville Jan 13  
 NPDES Permit No. AR0022403  
 Outfall No.(s) 1.00  
 Plant Avg Flow (MGD) 2.85  
 SIUs Avg Flow (MGD) 0.02  
 Domestic Flow (MGD) 2.83  
 Plant Design Flow (MGD) 4.00  
 Plant Design Flow (cfs) 6.18

Ouachita Mts. Eco (OM) = 2.0 mg/l Arkansas (Ft. Smith to Dardanelle Dam) 12.0 mg/l  
 Ozark Highlands Eco (OH) = 2.5 mg/l Arkansas (Dardanelle Dam to Terry L& 10.5 mg/l  
 Boston Mts. Eco (BM) = 1.3 mg/l Arkansas (Terry L&D to L&D No. 5) 8.3 mg/l  
 Ark River Valley Eco (AV) = 3.0 mg/l Arkansas (L&D No. 5 to Mouth) 9.0 mg/l

Gulf Coastal Eco (GC) = 5.5 mg/l White (Above Beaver Lake) 2.5 mg/l  
 Delta Ecoregion (DL) = 8.0 mg/l White (Below Bull Shoals to Black Riv) 3.3 mg/l  
 White (From Black River to Mouth) 18.5 mg/l  
 St. Francis River 18.0 mg/l  
 Ouachita (Above Caddo River) 2.0 mg/l  
 Ouachita (Below Caddo River) 5.5 mg/l  
 Red River 33.0 mg/l

**RECEIVING STREAM**

Is this a large river? (see list at right)(enter "1" if yes, "0" if no; make entry as a number) 0  
 Name of Receiving Stream: Town Branch  
 Waterbody Segment Code No. 3J

Is this a lake or reservoir? (enter '1' if yes, '0' if no; make entry as a number) 0  
 Is seasonal critical flow applicable (1=yes, 0=no; see Reg 2 page 1-3 for details.) 0  
 (Reserved) DO NOT INPUT DATA INTO CELL H22, H23 & H24....LEAVE BLANK  
 (Reserved)

**Total Hardness for:**

Arkansas River = 125 mg/l Red River = 211 mg/l  
 Ouachita River = 28 mg/l St. Francis River = 103 mg/l  
 White River = 116 mg/l

(Reserved) (Reserved) ?  
 (Reserved) (Reserved) ?  
 (Reserved) (Reserved) ?  
 (Reserved) (Reserved) ?

Gulf Coastal = 31 mg/l Ouachita Mount = 31 mg/l  
 Ozark Highlands = 148 mg/l Ark River Valley = 25 mg/l  
 Boston Mount = 25 mg/l Delta = 81 mg/l

Ecoregion TSS (mg/l) (For Large River, See List to Right) 2.50  
 Ecoregion Hardness (mg/l) 148.00  
 Enter 7Q10 (cfs) (Reserved) 0.10  
 Long Term Avg / Harmonic Mean Flow (cfs) 0.30  
 Using Diffusers (Yes/No) No  
 pH (Avg) 6.83  
 Percent (%) of 7Q10 for Chronic Criteria 0.67  
 Percent (%) of 7Q10 for Acute Criteria 0.33  
 Water Effect Ratio (WER) 1.00  
 EPA Statistical Factor for Data (enter 2.13 for <20; enter 1 for >20) 2.13  
 Ave Monthly Limit LTA Multiplier (Ref: page 103 TSD for WQ-Based Toxics Control) 1.55  
 Max Daily Limit LTA Multiplier (Ref: " " " " " ") 3.11

**Large Rivers**

Mississippi River, Arkansas River, Red River  
 White (Below confluence with Black River)  
 Ouachita (Below confluence with Little Miss. River)

**WQ Levels not to exceed for Bentonville Jan 13**

Aquatic Life  
AML, ug/l

Cadmium Total	7.0712
Chromium (hex)	11.9375
Copper Total	41.5251
Lead Total	18.9303
Mercury Total	0.0135
Nickel Total	426.5969
Selenium Total	5.6405
Silver Total	20.0574
Zinc Total	374.8799
Chromium (Tri)	1268.6246
Cyanide Total	5.8661
Beryllium Total	5.9789
Arsenic	346.0995

Bentonville Jan 13

Pollutant	% Rem***	Water Quality mg/l	Water Quality* lbs/day	Sludge mg/kg	Sludge **** lbs/day	Inhibition** mg/l	Inhibition^^ lbs/day	MAHL lbs/day	MAHC mg/l	Domestic Allocation for %SF lbs/day	Allocation for %SF lbs/day^	MAIL lbs/day	Max Inf Exceeded MAHC	Max Effluent vs WQS(mg/l)
Cadmium Total	74.2	0.0071	0.6515	85	0.62	1.00	23.77	0.619	0.0260	0.006	0.526	0.5199	No	No
Copper Total	84.6	0.0415	6.4092	4300	27.45	1.00	23.77	6.409	0.2696	0.945	5.448	4.5030	No	No
Lead Total	77.4	0.0189	1.9909	840	5.86	1.00	23.77	1.991	0.0838	0.035	1.692	1.6569	No	No
Mercury Total	93.7	0.00001	0.0051	57	0.33	0.10	2.38	0.005	0.0002	0.001	0.004	0.0038	No	No
Nickel Total	49.0	0.4266	19.8819	420	4.63	1.00	23.77	4.629	0.1947	0.092	3.934	3.8422	No	No
Selenium Total	50.0	0.0056	0.2681	100	1.08	0.20	4.75	0.268	0.0113	0.059	0.228	0.1689	No	No
Silver Total	83.4	0.0201	2.8720	0	0.00	0.25	5.94	2.872	0.1208	0.006	2.441	2.4353	No	No
Zinc Total	66.6	0.3749	26.6782	7500	60.81	0.50	11.88	11.885	0.5000	5.196	10.102	4.9057	No	No
Chromium Total	82.0	1.2686	167.5219	3000	19.76	1.00	23.77	19.756	0.8312	0.118	16.793	16.6746	No	No
Cyanide Total	69.0	0.0059	0.4498	0	0.00	0.10	2.38	0.450	0.0189	0.236	0.382	0.1461	No	No
Arsenic	63.6	0.3461	22.6001	75	0.64	0.10	2.38	0.637	0.0268	0.035	0.541	0.5064	No	No
Molybdenum	59.2	1.0000	58.2574	75	0.68	0.20	4.75	0.684	0.0288	0.094	0.582	0.4870	No	No
Beryllium	50.0	0.005979	0.2842	0	0.00	0.10	2.38	0.2842	0.0120	0.006	0.242	0.2357	No	No

Dry tons/day of sludge 2.70 Safety Factor 0.15

Yellow highlighted boxes indicate driving criteria

\* lbs/day = mg/l X 8.34 X POTW avg flow / (1-Total POTW %Rem)

\*\* EPA Default values (most conservative) from page G-1 of the 7/04 EPA TBLL guidance manual (Be est. @ 0.10 mg/l; Se & Mo est. @ 0.2 mg/l; Ag from old 12/87 EPA guidance manual)

\*\*\* EPA Default Median Removal Numbers from page R-2 of the 7/04 TBLL guidance manual for Se, Cr & CN (Be est. @ 50%)

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

^^ lbs/day = mg/l X Avg POTW flow X 8.34

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

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







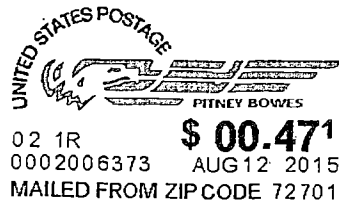
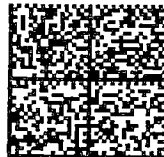






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PRESORTED  
FIRST CLASS



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GSLTLMF 72118

