

Lawrence, Myrl

From: Yates, Adam
Sent: Thursday, April 15, 2021 4:18 PM
To: Lawrence, Myrl
Cc: McWilliams, Carrie
Subject: Blytheville CAO 20-166 Pretreatment Program Deficiencies
Attachments: AR0022560_Blytheville 2020 Pretreatment Program Annual Report.pdf

Myrl,

Sorry for my misunderstanding of your original request for information regarding the subject CAO for Blytheville.

Based on my understanding of CAO 20-166, the pretreatment deficiencies were as follows:

1. Failure to issue control mechanisms to 90% of SIUs in a timely fashion;
2. Failure to inspect or sample at least 80% of SIUs;
3. Failure to enforce pretreatment standards and reporting requirements; and
4. Any other violation(s) of concern (e.g., incomplete influent/effluent monitoring).

Numbers 1 and 3 were resolved with the response provided by the consultant, Brad Wingfield, PMI. The 2018 report (link [here](#)) included documentation showing that control mechanisms were issued to all SIUs and are current. I also removed the violation for "failure to enforce pretreatment standards and reporting requirements" based on responses indicating that steps are in place to ensure standards and requirements are enforced as required.

Numbers 2 and 4 seem to be resolved based on the 2019 Report (attached) received July 28, 2020. Attachment C in the report shows that at least 80% of SIUs were inspected/sampled. The influent/effluent monitoring charts are complete for all 3 POTWs covered under the Blytheville Program.

If you have any questions or concerns, please feel free to contact me.

Kindly,

Adam Yates | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
5301 Northshore Drive | North Little Rock, AR 72118
t: (501) 682-0617 | e: yates@adeq.state.ar.us

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: July, 2019 TO August , 2020

TREATMENT PLANT: City of Blytheville - West NPDES PERMIT #AR0022560

AVERAGE POTW FLOW: 0.744 MGD % IU FLOW: 0 %

METALS, CYANIDE and PHENOLS	MAHC (Total) (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/quarter				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		9/25/19	1/31/20	4/17/20	6/23/20		9/25/19	1/31/20	4/17/20	6/23/20			
Antimony	N/A	<1.00	<1.00	<1.00	<1.00	N/A	<1.00	<1.00	<1.00	<1.00	60	EPA-200.8	1
Cadmium		<0.100	0.410	<0.100	0.202	4	<0.100	<0.100	<0.100	<0.100	0.5	EPA-200.8	0.1
Copper		49.1	130	17.4	36.3	29.5	5.88	9.05	5.34	15.5	0.5	EPA-200.8	0.5
Lead		1.56	13.7	1.01	3.97	11.7	<0.500	0.650	0.565	1.63	0.5	EPA-200.8	0.5
Mercury		0.0127	0.0348	0.0196	0.0105	0.013	0.0132	0.00878	0.00486	0.00168	.005	1631E	0.5
Nickel		1.90	14.0	4.10	3.38	322.7	2.21	2.57	2.57	3.59	0.5	EPA-200.8	0.5
Selenium		<1.00	2.00	<1.00	<1.00	50.3	<1.00	<1.00	<1.00	<1.00	5	EPA-200.8	2
Silver		0.435	4.64	<0.100	<0.100	124.4	<0.100	<0.100	<0.100	<0.100	0.5	EPA-200.8	0.1
Zinc		169	568	59.1	161	477.19	26.3	33.4	<20.0	53.0	20	EPA-200.8	5
Chromium		1.5	9.42	1.3	1.96	204.38	<1.00	<1.00	<1.00	1.10	10	EPA-200.8	1
Cyanide		<5	<5	<5	<5	84.3	8	<5	<5	<5	10	4500CNE- 2011	0.01
Arsenic		0.633	8.41	3.23	2.21	N/A	1.06	1.93	2.82	3.31	0.5	EPA-200.8	0.5
Molybdenum						N/A					--		
Phenols	N/A	15.4	8.2	5.8	144.6	N/A	<5	8.2	15.4	<5	5	420.1	0.5
Beryllium		<0.500	<0.500	<0.500	<0.500	N/A	<0.500	<0.500	<0.500	<0.500	0.5	EPA-200.8	0.5
Thallium	N/A	<0.200	<0.200	<0.200	<0.200	N/A	<0.100	<0.200	<0.200	<0.200	0.5	EPA-200.8	0.005

Flow, MGD	N/A	N/A	N/A	N/A	N/A	N/A	0.298	0.637	1.392	0.671			
(3)													

(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 TBL 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

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: July, 2019 TO August , 2020

TREATMENT PLANT: City of Blytheville - South NPDES PERMIT #AR0022578

AVERAGE POTW FLOW: 0.996 MGD % IU FLOW: 0 %

METALS, CYANIDE and PHENOLS	MAHC (Total) (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/quarter				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		9/25/19	1/31/20	4/17/20	6/23/20		9/25/19	1/31/20	4/17/20	6/23/20			
Antimony	N/A	1.02	<1.00	<1.00	<1.00	N/A	<1.00	<1.00	<1.00	<1.00	60	EPA-200.8	1
Cadmium		<0.100	<0.100	0.140	<0.100	4	<0.100	<0.100	<0.100	<0.100	0.5	EPA-200.8	0.1
Copper		66.6	15.2	14.4	18.0	29.5	6.10	6.81	2.59	3.89	0.5	EPA-200.8	0.5
Lead		1.66	0.975	1.12	0.869	11.7	0.570	0.534	<0.500	0.520	0.5	EPA-200.8	0.5
Mercury		0.0061	0.0571	0.0357	0.00775	0.013	0.00433	0.00303	0.00276	0.00790	.005	1631E	0.5
Nickel		3.41	2.55	3.33	3.59	322.7	2.09	2.12	2.21	3.05	0.5	EPA-200.8	0.5
Selenium		<1.00	<1.00	1.37	<1.00	50.3	<1.00	<1.00	1.10	<1.00	5	EPA-200.8	2
Silver		0.162	<0.100	<0.100	<0.100	124.4	<0.100	<0.100	<0.100	<0.100	0.5	EPA-200.8	0.1
Zinc		137	87.5	74.3	52.7	477.19	22.3	38.1	<20.0	21.9	20	EPA-200.8	5
Chromium		2.14	<1.00	1.41	1.01	204.38	<1.00	<1.00	<1.00	<1.00	10	EPA-200.8	1
Cyanide		<5	<5	<5	<5	84.3	5	<5	<5	<5	10	4500CNE- 2011	0.01
Arsenic		0.842	1.74	2.99	1.50	N/A	1.47	1.90	2.44	2.44	0.5	EPA-200.8	0.5
Molybdenum						N/A					--		
Phenols	N/A	22.6	31.3	23.5	50.2	N/A	<5	9.7	<5	<5	5	420.1	0.5
Beryllium		<0.500	<0.500	<0.500	<0.500	N/A	<0.500	<0.500	<0.500	<0.500	0.5	EPA-200.8	0.5
Thallium	N/A	<0.200	<0.200	<0.200	<0.200	N/A	<0.200	<0.200	<0.200	<0.200	0.5	EPA-200.8	0.005

Flow, MGD	N/A	N/A	N/A	N/A	N/A	N/A	0.618	0.882	1.46	1.031			
(3)													

(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 TBL 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.

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MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: July, 2019 TO August , 2020

TREATMENT PLANT: City of Blytheville - North NPDES PERMIT #AR0022586

AVERAGE POTW FLOW: 0.604 MGD % IU FLOW: 20 %

METALS, CYANIDE and PHENOLS	MAHC (Total) (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/quarter				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		9/25/19	1/31/20	4/17/20	6/23/20		9/25/19	1/31/20	4/17/20	6/23/20			
Antimony	N/A	<1.00	1.12	<1.00	1.36	N/A	1.61	<1.00	<1.00	1.22	60	EPA-200.8	1
Cadmium		<0.100	<0.100	<0.100	<0.100	4	<0.100	<0.100	<0.100	<0.100	0.5	EPA-200.8	0.1
Copper		7.86	76.3	11.6	50.9	29.5	41.6	5.49	4.71	4.63	0.5	EPA-200.8	0.5
Lead		1.36	31.8	0.654	3.37	11.7	0.600	0.571	<0.500	<0.500	0.5	EPA-200.8	0.5
Mercury		0.0113	0.00827	0.00860	0.00114	0.013	0.00588	0.00917	0.00897	0.0473	.005	1631E	0.5
Nickel		23.0	1950	202	987	322.7	246	489	233	477	0.5	EPA-200.8	0.5
Selenium		<1.00	<1.00	<1.00	<1.00	50.3	<1.00	<1.00	<1.00	<1.00	5	EPA-200.8	2
Silver		0.222	<0.100	<0.100	0.111	124.4	<0.100	<0.100	<0.100	<0.100	0.5	EPA-200.8	0.1
Zinc		288	1120	130	791	477.19	104	113	40.9	44.2	20	EPA-200.8	5
Chromium		1.56	845	18.0	333	204.38	12.6	21.3	11.3	11.1	10	EPA-200.8	1
Cyanide		<5	8	<5	<5	84.3	<5	<5	<5	<5	10	4500CNE- 2011	0.01
Arsenic		1.06	2.04	3.60	2.89	N/A	1.89	2.95	2.60	2.65	0.5	EPA-200.8	0.5
Molybdenum						N/A					--		
Phenols	N/A	25.9	37.0	32.8	63.7	N/A	<5	<5	7.3	<5	5	420.1	0.5
Beryllium		<0.500	<0.500	<0.500	<0.500	N/A	<0.500	<0.500	<0.500	<0.500	0.5	EPA-200.8	0.5
Thallium	N/A	<0.200	<0.200	<0.200	<0.200	N/A	<0.200	<0.200	<0.200	<0.200	0.5	EPA-200.8	0.005

Flow, MGD	N/A	N/A	N/A	N/A	N/A	N/A	0.299	0.479	0.946	0.697			
(3)													

(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 TBL 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

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Include NAICS code(s)

3rd column - include the CFR # only if the Category has Pretreatment Standards (numeric or narrative)

Please footnote N/A reason

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 BLYTHEVILLE WASTEWATER DEPARTMENT

Address 4834 N.C.R. 639 / PO BOX 1784

City BLYTHEVILLE State/Zip ARKANSAS 72315

Contact Person GARY CARR Position DEPARTMENT MANAGER

Contact Telephone 870-763-4961 NPDES Permit Nos. AR0022560, AR0022578, AR0022586

Reporting Period AUGUST 2019 JULY 2020

(Beginning Month, day and Year) (Ending Month, day and Year)

Total Number of Categorical IUs 3

Total Number of Significant Noncategorical IUs 0

Total Number of Non-Significant (yet permitted) IUs 0

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>3/3</u>	<u>/</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>0/3</u>	<u>0/0</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>0</u>	

III. Compliance Monitoring Program

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued / Total No. Required.	<u>0/0</u>	<u>0/0</u>
2) No. of Non-sampling Inspections Conducted / Total No. Required.	<u>3/3</u>	<u>0/0</u>
3) No. of Sampling Visits Conducted / Total No. Required.	<u>5/6</u>	<u>0/0</u>
4) No. of Facilities Inspected (nonsampling) / Total No. Required.	<u>3/3</u>	<u>0/0</u>
5) No. of Facilities Sampled / Total No. Required.	<u>3/3</u>	<u>0/0</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<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 (not surcharges) Collected (total dollars/IUs assessed) . . .	<u>0/0</u>	<u>0/0</u>
8) Other Actions (sewer bans, etc.).	<u>0</u>	<u>0</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 July 28-2020