

Lawrence, Myrl

Subject: FW: AR0022560 Blytheville Wastewater Pretreatment Report

From: Yates, Adam

Sent: Tuesday, November 5, 2019 4:31 PM

To: Brad Wingfield

Cc: Gary Carr; McWilliams, Carrie; Healey, Richard; Bolenbaugh, Jason

Subject: RE: AR0022560 Blytheville Wastewater Pretreatment Report

Brad,

City of Blytheville's August 2018 Pretreatment Program Annual Report was received late on September 26, 2019 and has been reviewed. There are several deficiencies that indicate the Program may be in significant noncompliance with pretreatment requirements:

1. The influent/effluent monitoring results for each POTW are incomplete. The West Plant (AR0022560) and South Plant (AR0022578) both are missing one quarter of monitoring results. The North Plant (AR0022586) is missing three quarters of monitoring results.
2. The percentage of the average flow to the POTW contributed by industrial users (IUs) is not calculated for any of the POTWs. It is understood that one or two of the three POTWs may not receive any IU wastewater, but it cannot be all of them.
3. According to the previous year's report, it appears that Regal Beloit is no longer permitted under the City's Program. Per 40 CFR 403.12(i)(1), a brief explanation of why the IU was removed from the Program must be provided.
4. SIUs and CIUs must have their discharges sampled a minimum of twice per year either by the industry itself or the City. Two CIUs, Omnium LLC and Primetals, were only sampled once during the reporting period.
5. Attachment C indicates that there is one non-categorical SIU permitted under the City's Program; however, there is no information about this industry included in the report. At a minimum, the following information should be included: name, permit status, compliance status, number of inspections performed, and number of sampling visits.
6. Attachment A details the latest permit action for two CIUs, Primetals and Precoat Metals, as January 1, 2014. This is concerning because the action took place over 5 years ago and potentially indicates that the IU permits have expired.
7. Attachment A details the compliance status of semi-annual reporting for two CIUs, Primetals and Precoat Metals, as N/A. There should be an explanation for this determination.
8. The third column of the Attachment A table should also specify which Standards of that categorical determination are applicable to the IU. (e.g., Primetals is either subject to 433.15 - pretreatment standards for existing sources or 433.17 - pretreatment standards for new sources)

Based on this review and per the EPA Memorandum (1990) on "Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements" (link [here](#)), the City currently meets four of the Level II Criteria:

- 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 violations of concern (e.g., incomplete influent/effluent monitoring) to the Approval Authority.

According to the EPA Memo, meeting two or more of the Level II Criteria is considered Significant Noncompliance (SNC) and should be reported on the Quarterly Noncompliance Report (QNCR). **Please provide a response for each of the deficiencies listed above within 30 days from the date of this email.**

Thank you for your cooperation in this matter. If you have any questions or concerns, please feel free to contact me.

Kindly,

Adam Yates | State Pretreatment Coordinator
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From: Brad Wingfield [<mailto:BWingfield@pmico.com>]
Sent: Thursday, September 26, 2019 11:31 AM
To: Yates, Adam
Cc: Gary Carr
Subject: AR0022560 Blytheville Wastewater Pretreatment Report

Adam,

Attached is the City of Blytheville's 2019 Pretreatment Program Annual Report. Please review and let us know if you have any questions or comments.

Thanks,
Brad

Brad Wingfield, P.E.
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