

**From:** [Belcourt, Jamie](#)  
**To:** [Byrd, Johnson \(Johnson.Byrd@jacobs.com\)](#)  
**Cc:** [Healey, Richard](#); [Ramsey, David](#); [Wassell, Stacie](#)  
**Subject:** City of Fayetteville - May 2022 Pretreatment Program Annual Report  
**Date:** Thursday, June 2, 2022 8:19:59 AM  
**Attachments:** [image003.png](#)

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John,

The City of Fayetteville's May 2022 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 CFR 403.12(i). Thank you for your timely submittal. If you have any questions or concerns on this matter, please feel free to contact me.

Regards,

**Jamie Belcourt** | Pretreatment Coordinator

**Division of Environmental Quality | Office of Water Quality**

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0858 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)





May 31<sup>st</sup>, 2022

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

**RE: City of Fayetteville 2020 Annual Pretreatment Report  
(Permit No. AR0020010, AFIN 72-00781 and AR0050288, AFIN 72-01033)**

To whom it may concern,

In accordance with NPDES Permits AR0020010, AFIN 72-00781 and AR0050288, AFIN 72-01033, the Annual Pretreatment Report is enclosed.

Please do not hesitate to contact the Industrial Pretreatment Coordinator, John Byrd, at 479-443-3292 ext. 3 or by email at [johnson.byrd@jacobs.com](mailto:johnson.byrd@jacobs.com) if you have any questions.

*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.*

Sincerely,

**City of Fayetteville**

A handwritten signature in blue ink, appearing to read "Tim Nyander", is written over a light blue horizontal line.

Tim Nyander  
Utilities Director  
Utilities Department

Enclosure

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT<sup>1</sup>**  
**REPORTING YEAR: January 2021 TO December 2021**  
**TREATMENT PLANT: City of Fayetteville Paul R. Noland WRRF NPDES PERMIT # AR0020010**  
**AVERAGE POTW FLOW: 5.6871 MGD % IU FLOW: 13.7%**

METALS, CYANIDE, and PHENOLS (Total)	MAHC <sup>2</sup> (Total) (µg/L) <sup>3</sup>	Influent Dates Sampled (µg/L) Once/quarter				WQ <sup>4</sup> level/ limit (µg/L) <sup>3</sup>	Effluent Dates Sampled (µg/L) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/L) <sup>5</sup>	EPA Method Used <sup>5</sup>	Detection Level Achieved (µg/L)
		02/02/21	05/04/21	07/27/21	11/30/20		02/03/21	05/05/21	07/28/21	12/01/21			
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8	60
Cadmium	21.2	0	0	0	0	7.00	0	0	0	0	0.5	200.8	0.5
Copper	684.66	18	21	15.1	17.1	41.08	2.9	1.4	1.11	1.54	0.5	200.8	0.5
Lead	39.02	0.63	1.7	1.87	0.859	18.73	0	0	0	0	0.5	200.8	0.5
Mercury	0.03	0.015	0	0.012	16.3	0.01	0	0	0	0	0.005	245.7	0.0050
Nickel	235.34	4.2	5.3	5.00	4.12	422.02	2.8	2.8	2.51	2.06	0.5	200.8	0.5
Selenium	11.16	0	0	0	0	5.58	0	0	0	0	5	200.8	5
Silver	44.34	0	0.69	0	0	19.95	0	0	0	0	0.5	200.8	0.5
Zinc	300.00	82	66	99.3	72.6	372.89	20	0	0	0	20	200.8	20
Chromium	676.51	0	0	0	0	1255.02	0	0	0	0	10	200.8 & 200.7	10
Cyanide	18.72	0	0	0	0	5.80	0	0	0	0	10	SM 4500-CN C, E 2011	10
Arsenic	30.82	16	14	0.94	0	342.39	2.0	4.4	0.537	0	0.5	200.8	0.5
Molybdenum	27.74	0	0	0	0	N/A	0	0	0	0	N/A	200.8	10
Phenols	N/A	100	170	19.30	27.4	N/A	0	0	0	0	5	420.1	5
Beryllium	11.83	0	0	0	0	5.91	0	0	0	0	0.5	200.8	0.5
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	5.167	12.177	6.077	4.185	N/A	5.88	10.19	6.09	4.94	N/A	N/A	N/A
NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20	625.1	N/A

<sup>1</sup> In accordance with an email from Allen Gilliam of ADEQ dated January 26, 2009, any non-detect value AT or BELOW the EPA required MQL report as "0", non-detect values ABOVE the EPA required MQL report as a "less than" with a footnote stating that was the lab's lowest achievable MQL.

<sup>2</sup> MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration

<sup>3</sup> This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff. [Table & values provided by R. Torrence of ADEQ in a letter dated October 1, 2009.]

<sup>4</sup> WQ - "Water Quality Levels not to exceed" OR actual permit limit.

<sup>5</sup> 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.**

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT<sup>6</sup>**  
**REPORTING YEAR: January 2021 TO December 2021**  
**TREATMENT PLANT: City of Fayetteville West Side WRRF**      **NPDES PERMIT # AR0050288**  
**AVERAGE POTW FLOW: 9.8907 MGD**      **% IU FLOW: 0.0%**

METALS, CYANIDE, and PHENOLS (Total)	MAHC <sup>7</sup> (Total) (µg/L) <sup>8</sup>	Influent Dates Sampled (µg/L) Once/quarter				WQ <sup>9</sup> level/ limit (µg/L) <sup>8</sup>	Effluent Dates Sampled (µg/L) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/L) <sup>10</sup>	EPA Method Used <sup>10</sup>	Detection Level Achieved (µg/L)
		02/10/21	05/03/21	07/29/21	12/02/21 <sup>11</sup>		02/11/21	05/04/21	07/30/21	12/03/21 <sup>11</sup>			
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8 & 200.7	1, 10 & 60
Cadmium	21.2	0	0	0	<2	7.00	0	0	0	<2	0.5	200.8 & 200.7	0.1 & 0.5
Copper	456.44	17	21	12.9	28.9	41.08	2.2	1.4	1.41	<5	0.5	200.8 & 200.7	0.5
Lead	74.91	0.65	1.7	0.793	6.9	18.73	0	0	0	<6	0.5	200.8 & 200.7	0.5
Mercury	0.03	0	0	0.0146	0.0404	0.01	0	0	0	0.00052	0.005	245.7	0.0005, 0.0025 & 0.0050
Nickel	844.04	4.3	5.3	18.7	<5	422.02	3.4	2.8	14.1	<5	0.5	200.8 & 200.7	0.5
Selenium	11.16	0	0	0	<10	5.58	0	0	0	<10	5	200.8 & 200.7	1 & 5
Silver	86.74	ND	0.69	0	<5	19.95	0	0	0	<5	0.5	200.8 & 200.7	0.1 & 0.5
Zinc	300.00	110	66	70.3	97.3	372.89	23	0	0	26.6	20	200.8 & 200.7	20
Chromium	1000.0	0	0	78.5	9.6	1255.02	0	0	0	0	10	200.8	10
Cyanide	18.72	0	0	0	0	5.80	0	0	0	0	10	SM4500-CN C, E 2011	5 & 10
Arsenic	100.0	17	14	0	<10	342.39	1.5	4.4	0	<10	0.5	200.8 & 200.7	0.5
Molybdenum	200.0	0	0	1.21	0	N/A	0	0	0	0	30	200.8 & 200.7	1 & 10
Phenols	N/A	100	170	13	<250	N/A	6.0	0	0	<50	5	420.1	5
Beryllium	11.83	0	0	0	<1	5.91	0	0	0	<1	0.5	200.8 & 200.7	0.5
Thallium	N/A	0	0	0	<20	N/A	0	0	0	<20	0.5	200.8 & 200.7	0.2 & 0.5
Flow, MGD	N/A	8.8423	15.215	9.584	6.4097	N/A	8.714	21.818	8.832	6.254	N/A	N/A	N/A
4, 4'-DDT	N/A	N/A	N/A	0.00969	N/A	N/A	N/A	N/A	0	N/A	0.02	608.3	0.00533
Chlorpyrifos	N/A	N/A	N/A	0.00665	N/A	N/A	N/A	N/A	0	N/A	0.07	608.3	0.00533
Chloroform	N/A	N/A	N/A	3.72	N/A	N/A	N/A	N/A	0	N/A	10	624.1	1.00

<sup>6</sup> In accordance with an email from Allen Gilliam of ADEQ dated January 26, 2009, any non-detect value AT or BELOW the EPA required MQL report as "0", non-detect values ABOVE the EPA required MQL report as a "less than" with a footnote stating that was the lab's lowest achievable MQL.

<sup>7</sup> MAHL - Maximum Allowable Headworks Level / MAHC - Maximum Allowable Headworks Concentration

<sup>8</sup> This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff. [Table & values provided by R. Torrence of ADEQ in a letter dated October 1, 2009.]

<sup>9</sup> WQ - "Water Quality Levels not to exceed" OR actual permit limit.

<sup>10</sup> 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.**

<sup>11</sup> During analysis of the sampling events having taken place on **December 2<sup>nd</sup> & 3<sup>rd</sup>, 2021**, EPA Method 200.7 (Determination of Metals and Trace Elements in Water and Wastes by Inductively Coupled Plasma-Atomic Emission Spectrometry) was performed, instead of EPA Method 200.8 (Determination of Trace Elements in Waters and Wastes by Inductively Coupled Plasma-Mass Spectrometry) thereby resulting in an insufficient Minimum Quantification Level (MQL) for multiple Table III pollutants as is defined in the 2020 draft State of Arkansas Continuing Planning Process (CPP) document Section 4.4.

PRETREATMENT PROGRAM STATUS REPORT  
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	SIC Code/ NAICS Code	Categorical Determination (40CFRXXX or N/A)	Control Document		New User or Newly ID	Times Inspected	Times Sampled <sup>12</sup> (SIU+WRRF/ WRRF sampling)	Compliance Status <sup>13</sup> (N/A, C, NC, or SNC)					WRRF <sup>14</sup>
			Y or N	Last Action				Reports				Permit Limits (parameter violated & number of times)	
								BMR	90-Day Compliance	Semi Annual	Self Monitoring		
Custom Powder Coating Services, Inc.	3479/332812	40 CFR 433	Y	10/01/18 Reissued	No	1	3/1	N/A	N/A	C	C	C	NOL
Elkhart Products Corporation	3498/332996 3351/331420 3366/331529 3432/332913	40 CFR 468	Y	07/01/20 Modification	No	1	47/1	N/A	N/A	C	C	C	NOL
Hiland Dairy Foods, Inc.	2026/311511 2086/312111	N/A	Y	10/01/18 Reissued	No	1	369/4	N/A	N/A	C	C	C	NOL
Marshalltown Company	3423/332212	40 CFR 433	Y	10/01/18 Reissued	No	1	3/1	N/A	N/A	C	C	C	NOL
ConAgra Foods Packaged Foods, LLC	2038/311412	N/A	Y	01/01/20 Transfer	No	1	162/4	N/A	N/A	C	C	C	NOL
Ecotech Consumer Products	2821/325991	40 CFR 463	Y	12/1/21 Issued	Yes	0	3/0	N/A	N/A	C	C	NC: TSS 1 monthly avg & 1 daily max; 2 NOVs	NOL
Tyson of Fayetteville	2038/311412 2099/311830	N/A	Y	10/01/18 Reissued	No	1	369/4	N/A	N/A	C	C	C	NOL

<sup>12</sup> Per Don Morgan (ADEQ) and David Long (EPA) 2/1/2006 Pretreatment Compliance Inspection—include self-monitoring in these data.

<sup>13</sup> N/A = Not Applicable; C = Compliant: no violations in pretreatment year; NC = Non-compliant: 1 or more violations in pretreatment year, but not SNC; SNC = Significant Noncompliance: as defined in 40 CFR 403.8(f)(2) and the Fayetteville Sewer Use Ordinance and calculated on rolling quarters.

<sup>14</sup> NOL = Paul R. Noland Water Resource Recovery Facility; WS = West Side Water Resource Recovery Facility

Significant Non-Compliant (SNC) Industries - Enforcement Actions Taken

Industrial User Name	Nature of Violation		Number of Actions Taken					Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other		Date Issued	Date Due		

**PRETREATMENT PERFORMANCE SUMMARY**

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: **City of Fayetteville**  
1400 N Fox Hunter Road  
Fayetteville, AR 72701

Contact Person: John Byrd, IPP Coordinator  
(479) 443-3292 ext. 3

NPDES No.: **AR0020010 & AR0050288**

Reporting Period: January 1, 2021 –  
December 31, 2021

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.



Tim Nyander  
Utilities Director  
Authorized Representative

May 31, 2022  
Date

Total Categorical IUs: 4

Total Significant Noncategorical IUs: 3

Total Non-Significant (yet permitted) IUs: 0

**II. Significant Industrial User Compliance**

**Significant Industrial Users**

Categorical	Noncategorical
-------------	----------------

1) No. of SIUs submitting BMRs/No. Required.....	1 / 1	N/A
2) No. of SIUs submitting 90-Day Compliance Reports/No. Required.....	0 / 0	N/A
3) No. of SIUs submitting Semiannual Report/No. Required.....	4 / 4	3 / 3
4) No. of SIUs meeting Compliance Schedule/No. Required.....	0 / 0	0 / 0
5) No. of SIUs in Significant Noncompliance/Total No. of SIUs.....	0 / 4	0 / 3
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical).....	0 / 7	

**III. Compliance Monitoring Program**

1) No. of Control Documents Issued/No. Required.....	4 / 4	3 / 3
2) No. of Non-sampling Inspections Conducted.....	3	3
3) No. of Sampling Visits Conducted.....	3	12
4) No. of Facilities Inspected (nonsampling).....	3	3
5) No. of Facilities Sampled.....	3	3

**IV. Enforcement Actions**

1) Compliance Schedules Issued/Schedules Required.....	0 / 0	0 / 0
2) Notices of Violation Issued to SIUs.....	2	0
3) Administrative Orders Issued to SIUs.....	0	0
4) Civil Suits Filed.....	0	0
5) Criminal Suits Filed.....	0	0
6) Significant Violators (attach newspaper list).....	0	0
7) Amount of Penalties Collected (total dollars/IUs assessed).....	\$0 / 0	\$0 / 0
8) Other Actions (sewer bans, etc.).....	0	0

## 2021 Industrial Pretreatment Year

The staff completed Jacobs quarterly IPQC tracking report on Industrial Pretreatment compliance, as well as the monthly data entry for the Maximum Allowable Headworks Loading (MAHL) data base for both Noland and West Side WRRFs.

No authorization to discharge was revoked for significant industrial user. No interference, pass through, upset or WRRF permit violations occurred that were known or suspected to be caused by industrial contributors and so no actions were taken.

The Arkansas Department of Environmental Quality (ADEQ) and Federal Regulations require the City of Fayetteville to conduct a Wastewater Survey of the users within service areas every three years. The reason for this survey is to determine if users' wastewater could have a significant impact on the wastewater collection and treatment system and its processes, as well as to confirm compliance with the Industrial Pretreatment Program and the Discharge and Pretreatment Regulations in the Fayetteville Code. Surveys were mailed at the beginning of February 2020 and were due back to the IPP coordinator by the end of April of 2020. By the end of 2021, there was an 83% remittance rate. This is a continuation of the 2020 Wastewater Survey, as the original mailing occurred during the start of the Covid-19 Pandemic and thus responses were limited. The original response rate for the 2020 Wastewater Survey was about 54%.

Final notices were issued again to dental providers that have yet to complete or did not originally sign the 1<sup>st</sup> the one-time compliance report regarding the EPA dental amalgam rule that had a deadline of July 14<sup>th</sup>, 2020. All notices have been signed and are on file.

Ecotech Consumer Products became the most recent categorical industrial user in Fayetteville under the plastics molding and forming sub-category for new users (\$463.26). This industry is required to self-monitor for metals/cyanide monthly, and total suspended solids weekly due to concerning preliminary sampling/testing. Estimated discharge will 7,000 gallons per day.