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# CITY OF FAYETTEVILLE, AR


## PAUL R. NOLAND WASTEWATER TREATMENT FACILITY INDUSTRIAL PRETREATMENT PROGRAM ANNUAL REPORT

NPDES PERMIT # AR0020010

PROGRAM YEAR  
January 2007 - December 2007

Submitted by:

City of Fayetteville  
113 W. Mountain Ave.  
Fayetteville, AR 72701  
(479) 575-8330  
(479) 575-8257 Fax


  
\_\_\_\_\_  
David Jurgens, P.E.  
Water and Wastewater Director

NPDES PERMIT FILE  
NPDES # AR0020010  
AFIN # 72-00781  
Permit PN  
Correspondence  
Technical Backup  
8/5/08 vlt Date Scanned

May 2008

POST  
JUN 30 2008  
MARKED

## 2007 Industrial Pretreatment Year

Arkansas Democrat  Gazette

▲ FRIDAY, MAY 30, 2008 ● 9G

Public Notice of Significant Industrial Pollution Violations. Listed below are significant wastewater discharge violations as defined in Part 51.082 of the Fayetteville Code of Ordinances:

Custom Powder Coating Services, Inc., 1629 W. Farmington, Fayetteville, AR. Violations: Discharge without an industrial waste discharge permit (Part 51.077(B)). Failure to submit a baseline monitoring report, a report on compliance with categorical pretreatment standards, and periodic reports on continued compliance in accordance with regulations (51.079(A), (C), & (D)). These violations constitute significant noncompliance according to Part 51.082 of the Fayetteville Code of Ordinances. Actions taken: Notice of violation was issued to Custom Powder Coating Services. They were required to apply for an industrial wastewater discharge permit, which included the baseline monitoring report information. A permit was issued, which includes required reports on compliance. Response: Custom Powder Coating Services submitted the permit application and fee and received a permit. Status: Custom Powder Coating Services is in compliance with its permit.

51153624 May 30, 2008

**Attachment C**  
Pretreatment Program Status Report  
Updated Significant Industrial Users List

Industrial User	SIC Code	Categorical Determination	Control Document		New User or New ID	Times Inspected	Times Sampled (SIU+POTW/POTW sampling)	Compliance Status <sup>1</sup>				
			Y/N	Effective Date/ Action				Reports				
								BMR	90-Day Compliance	Semi Annual	Self Monitoring	Effluent Limits
Ayrshire Electronics, LLC, 1101 S. Beechwood Ave.	3672	Non-Categorical	Y	033103/ Reissued	No	1	13/1	N/A	N/A	C	C	C
Cooper Power Systems/Kearney Operation, 3660 S. School	3643	Non-Categorical	Y	112707/ Voided Permit	No	1	10/1	N/A	N/A	C	NC	C
Custom Powder Coating Services, Inc, 1629 W. Farmington	3479	40 CFR 433	Y	1/1/08	Yes	1	0	SNC	SNC	SNC	SNC	NA
Elkhart Products Corporation, 3265 Hwy 71 S.	3498 3351 3366 3432	40 CFR 468	Y	090103/ Reissued 080405/ Modified	No	1	25/1	N/A	N/A	C	C	C
Hiland Dairy Company, 301 E. 15 <sup>th</sup> St.	2026 2086	Non-Categorical	Y	030105/ Reissued	No	1	365/4	N/A	N/A	C	C	C

<sup>1</sup> N/A = Not Applicable

C = Compliant: no violations in pretreatment year.

NC = Noncompliant: 1 or more violations in pretreatment year, but not SNC.

SN = Significant Noncompliance: as defined in 40 CFR 403.8(f)(2) and calculated on rolling quarters.

**Attachment C**  
**Pretreatment Program Status Report**  
**Updated Significant Industrial Users List**

Industrial User	SIC Code	Categorical Determination	Control Document		New User or New ID	Times Inspected	Times Sampled (SIU+POTW/POTW sampling)	Compliance Status <sup>1</sup>				
			Y/N	Effective Date/ Action				Reports				Effluent Limits
								BMR	90-Day Compliance	Semi Annual	Self Monitoring	
K-D Tools, 2900 City Lake Road	3423 3471	40 CFR 433	Y	090106/ Reissued	No	2	51/1	N/A	N/A	C	C	C
Marshalltown Tools, 2200 Industrial Drive	3423	40 CFR 433	Y	120103/ Reissued	No	1	7/1	N/A	N/A	C	C	C
Pinnacle Foods Corporation, 100 W 15 <sup>th</sup> St.	2038	Non-Categorical	Y	060105/ Reissued	No	2	160/4	N/A	N/A	C	C	C
Superior Industries International, 1901 Borick Dr.	3363 3398 3471 3479	40 CFR 433	Y	100103/ Reissued	No	2	101/1	N/A	N/A	C	C	C
Tyson Foods (South), 2615 S. School	2038 2099	Non-Categorical	Y	030105/ Reissued	No	1	365/4	N/A	N/A	C	C	C

**Attachment E**  
Significant Violators - Enforcement Actions Taken

Industrial User	Nature of Violation		Number of Actions Taken				Penalties Collected	Compliance Schedule to meet effluent limits		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other	Date Issued	Date Due		
Custom Powder Coating Services	Discharge without an industrial waste discharge permit. Late BMR, 90- day compliance report, & periodic reports.		1				SNC publication			C	Issued permit

## 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: Denise Georgiou, IPC  
(479) 443-3292

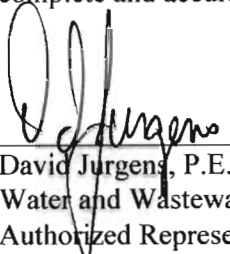
NPDES No.: **AR0020010**

Reporting Period: January 2007 - December 2007

Total Categorical IUs:	6
Total Significant Noncategorical IUs:	4
Total Non-Significant (yet permitted) IUs:	0

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.

  
David Jurgens, P.E.  
Water and Wastewater Director  
Authorized Representative

28 May 2008  
Date

### II. Significant Industrial User Compliance

	Significant Industrial Users	
	Categorical	Noncategorical
1) No. of SIUs submitting BMRs/No. Required.....	0 / 1	N/A
2) No. of SIUs submitting 90-Day Compliance Reports/No. Required.....	0 / 1	N/A
3) No. of SIUs submitting Semiannual Report/No. Required.....	5 / 6	4 / 4
4) No. of SIUs meeting Compliance Schedule/No. Required.....	0 / 0	0 / 0
5) No. of SIUs in Significant Noncompliance/Total No. of SIUs.....	1 / 6	0 / 4
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical).....	1 / 10	

### III. Compliance Monitoring Program

1) No. of Control Documents Issued/No. Required.....	1 / 1	0 / 0
2) No. of Nonsampling inspections Conducted.....	8	5
3) No. of Sampling Visits Conducted.....	5	13
4) No. of Facilities Inspected (nonsampling).....	6	4
5) No. of Facilities Sampled.....	5	4

### IV. Enforcement Actions

1) Compliance Schedules Issued/Schedules Required.....	0 / 0	0 / 0
2) Notices of Violation Issued to SIUs.....	1	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).....	1	0
7) Amount of Penalties Collected (total dollars/IUs assessed).....	\$0 / 0	\$0 / 0
8) Other Actions (sewer bans, etc.).....	0	0

Monitoring Results (1) for the Annual Pretreatment Report  
 Reporting Year: January 1, 2007 - December 31, 2007  
 Treatment Plant: Fayetteville Municipal Pollution Control Facility NPDES Permit # AR0020010  
 Average POTW Flow: 11.29 MGD %IU Flow: 13.5%

Metals, Cyanide, & Phenols	MAHL lb/day (3) & (4)	Influent (mg/l) (2) Dates Sampled											
		01/27/07	02/26/07	03/27/07	04/30/07	05/02/07	06/11/07	07/24/07	08/23/07	09/25/07	10/10/07	11/17/07	12/26/07
Antimony		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
Arsenic	13.83	ND	ND	ND	ND	ND	ND	0.001	0.001	ND	ND	ND	
Beryllium		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
Cadmium	0.44	0.0004	0.0003	0.0004	0.0005	0.0015	0.0004	0.0004	0.0004	0.0005	0.0006	0.0008	
Chromium	10.82	0.0020	ND	0.0030	0.0100	0.0040	0.0040	0.016	ND	0.016	0.008	ND	
Copper	6.10	0.029	0.024	0.033	0.035	0.026	0.025	0.079	0.093	0.094	0.110	0.150	0.180
Lead	3.18	0.005	0.008	0.004	0.016	0.008	0.018	0.012	0.006	0.015	0.003	0.004	
Mercury	0.0018	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.0006	ND	
Molybdenum													
Nickel	6.61	ND	ND	ND	0.011	ND	ND	0.012	ND	0.013	ND	ND	
Selenium		ND	0.003	ND	0.002	ND	ND	ND	ND	ND	ND	ND	
Silver	24.96	0.0007	0.0006	0.0019	0.0015	0.0021	ND	0.0032	0.0016	0.0017	0.0014	0.0023	
Thallium		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
Zinc	36.60	0.42	0.09	0.13	0.16	0.12	0.13	0.27	0.16	0.18	0.20	0.24	
Cyanide	0.60		0.01								ND		
Phenols			0.062								0.043		
Flow, MGD		13.54	12.56	10.69	10.82	13.30	10.06	9.40	10.02	10.52	10.62	9.02	7.76
(5)													

ND = Not Detected

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant.

Analytical MQLs should be used so that the data can also be used for Local Limits assessments and NPDES application purposes.

(2) Indicate reported unit of measure.

(3) This value was calculated during development of TBLL and based on State Water Quality Standards and implementation procedures.

(4) This can be reported in ppm (mg/l), ppb, lb/day.

(5) Record the name of any pollutants [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity in which they were detected.

Monitoring Results (1) for the Annual Pretreatment Report  
 Reporting Year: January 1, 2007 - December 31, 2007  
 Treatment Plant: Fayetteville Municipal Pollution Control Facility NPDES Permit # AR0020010  
 Average POTW Flow: 11.29 MGD %IU Flow: 13.5%

Metals, Cyanide, & Phenols	WQ Level/Limit (mg/l) (3) & (4)	Effluent (mg/l) (2) Dates Sampled	
		02/26/07	10/10/07
Antimony		ND	ND
Arsenic	0.34	ND	ND
Beryllium		ND	ND
Cadmium	0.007	ND	0.0001
Chromium	1.26	ND	0.003
Copper	0.04	0.005	0.0016
Lead	0.02	0.006	0.013
Mercury	0.00001	ND	ND
Molybdenum			
Nickel	0.42	ND	ND
Selenium		0.002	ND
Silver	0.02	ND	ND
Thallium		ND	ND
Zinc	0.37	0.02	0.02
Cyanide	0.01	0.006	ND
Phenols		0.005	0.009
Flow, MGD		17.88	10.62
(5)			

ND = Not Detected

Effluent = Flow proportioned composite of White River and Mud Creek discharges

- (1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant.

Analytical MQLs should be used so that the data can also be used for Local Limits assessments and NPDES application purposes.

- (2) Indicate reported unit of measure.

- (3) This value was calculated during development of TBLL and based on State Water Quality Standards and implementation procedures.

- (4) This can be reported in ppm (mg/l), ppb, lb/day.

- (5) Record the name of any pollutants [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity in which they were detected.

(See next two tables in this report, influent and effluent organics, for 40 CFR 122, Appendix D, Table II data)

Reporting Year: January 1, 2007 – December 31, 2007  
Treatment Plant: Fayetteville Municipal Pollution Control Facility NPDES Permit # AR0020010  
Average POTW Flow: 11.29 MGD %IU Flow: 13.5 %

Laboratory Analysis for Influent and Effluent			
Metals and Cyanide	EPA Method Used	Detection Level Achieved (µg/l)	Detection Level Required (From ADEQ Web site May '08) (µg/l)
Antimony, Total Recoverable	200.8	3	60
Arsenic, Total Recoverable	200.8	1	10
Beryllium, Total Recoverable	200.8	0.3	5
Cadmium, Total Recoverable	200.8	0.1	1
Chromium, Total Recoverable	200.8	1	10
Chromium, (6+) Dissolved			10
Copper, Total Recoverable	200.8	1	10
Lead, Total Recoverable	200.8	1	5
Mercury, Total Recoverable	245.2	0.2	0.2
Nickel, Total Recoverable	200.8	10	40
Selenium, Total Recoverable	200.8	2	5
Silver, Total Recoverable	200.8	0.2	2
Thallium, Total Recoverable	200.8	1	10
Zinc, Total Recoverable	200.8	2	20
Cyanide, Total Recoverable	335.2	5	20
Phenols, Total Recoverable	420.1	5	5

**Torrence, Rufus**

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**From:** Torrence, Rufus  
**Sent:** Monday, August 04, 2008 8:16 AM  
**To:** 'Denise Georgiou'  
**Cc:** Richart, Bruce; Fuller, Kim; Tran, Duyen  
**Subject:** RE: AFIN 72-00102 AR0020010 City of Fayetteville: 2007 Annual Report

**Tracking:** **Recipient**      **Delivery**  
                  'Denise Georgiou'  
                  Richart, Bruce  
                  Fuller, Kim      Delivered: 08-04-2008 8:17 AM  
                  Tran, Duyen

Denise,

My reply is in red below.

-----Original Message-----

**From:** Denise Georgiou [mailto:dgeorgiou@arkansasusa.com]  
**Sent:** Friday, August 01, 2008 4:47 PM  
**To:** Torrence, Rufus  
**Cc:** Richart, Bruce; Fuller, Kim; Tran, Duyen  
**Subject:** Re: AFIN 72-00102 AR0020010 City of Fayetteville: 2007 Annual Report

Rufus,

Please see my responses interspersed below.

Denise Georgiou  
 Industrial Pretreatment Coordinator  
 CH2M HILL OMI  
 1400 N. Fox Hunter Road  
 Fayetteville, AR 72701  
 479.443.3292 Tele  
 479.443.5613 Fax  
 dgeorgiou@arkansasusa.com

----- Original Message -----

**From:** Torrence, Rufus  
**To:** dgeorgiou@arkansasusa.com  
**Cc:** Fuller, Kim  
**Sent:** Friday, August 01, 2008 7:58 AM  
**Subject:** AFIN 72-00102 AR0020010 City of Fayetteville: 2007 Annual Report

Denise,

I am reviewing your last annual report. I have a few concerns:

Rufus - Fayetteville's new West Side POTW came online June 2008 and flows have slowly been transferred from Noland to West Side. Because we knew data generated before the split would not be useful in assessing TBLLs, we kept analyses to the minimum needed to meet NPDES requirements and process control needs leading up to the split flow.

The City of Fayetteville is only required to meet the minimum...

1. You listed no analytical results on the effluent for the second and third quarters. Do you have lab data on the effluent for the second and third quarters?

Response: We do not have other effluent lab data for these parameters. In accordance with Page 4, of Part III, 8.C. of NPDES permit number AR0020010 effective June 1, 2006, we are required to analyze the influent and effluent for pollutants in Table III at least twice/year.

One of our permits has an error... Page 4 of Part III in every permit issued to cities with approved pretreatment programs are required to analyze for Table III pollutants at least FOUR/YEAR. Please review the AR0020010 permit shown on ADEQ website; if your permit is different from the one on the website, let me know. For your convenience I have attached a copy of it.

2. You listed no analytical results in the second and third quarter for cyanide; do you have this data?

Response: We do not have other cyanide analytical results. In accordance with Page 4, of Part III, 8.C. of the permit, we are required to analyze the influent and effluent for pollutants in Table III at least twice/year.

Ditto..FOUR/YEAR

3. There were some errors(?) on Attachment D (Pretreatment Performance Summary). You have 10 SIUs; therefore, you are required to have 10 Control Documents. You listed only one under section III Compliance Monitoring Program. If you were trying to show that you issued only one new permit, then this is not the intent.

Response: The EPA *Pretreatment Compliance Monitoring and Enforcement Guidance*, July 1986, does not help clarify this. In reference to Part III it states, "The Control Authority should complete the table with the number of control documents (i.e. permits) issued to industrial users and the number required;..."

The Pretreatment Performance Summary is for the pretreatment year, and all information appears to be intended for events that occurred during that year. A comparison to the wording in section II, 1), for example: "No. of SIUs submitting BMRs/No. Required," is read as, "Number of SIUs submitting BMRs this year, number required this year," when completing the table. Please note that Attachment C in the annual report has columns indicating whether SIUs have control documents and their effective date.

If all Arkansas Pretreatment Performance Summaries are required to report total number of permits issued/required "to date" instead of "in the IPP year" in that section, I will gladly change our method of reporting.

OK

You did not analyze for Molybdenum at all; you SHOULD analyze for Molybdenum, too. EPA has added molybdenum to its list of Pollutant of Concerns for the purpose of local limits.

Response: EPA *Local Limits Development Guidance*, July 2004, page 3-1, part 3.1 in its discussion of POCs states, "EPA added molybdenum and selenium because they are part of the Federal biosolids regulations for the land application of sludge." The last paragraph of section 3.2.3 on page 3-4 notes that sludge should be tested for TCLP if it is landfilled. We currently landfill our sludge and have it analyzed for TCLP. I find no molybdenum inhibition levels, or Water Quality Standards in the guidance. We do not plan to land apply sludge in the near future and therefore don't plan to test for molybdenum.  
– Denise

None of the pretreatment cities are required to analyze for Molybdenum but most of the cities are analyzing for Mo (even the cities which have no immediate plans to land apply). EPA guidance allows cities to preserve a land disposal option (land application) even if the city has no immediate plans to land apply. Most cities are land filling their sludge and preserving the option to land apply. The City of Fayetteville is not required to preserve the option to land apply but I do recommend that you do.

Rufus J. Torrence, Engineer  
**ARKANSAS DEPT OF ENVIRONMENTAL QUALITY**  
 Water Division  
 5301 Northshore Drive  
 North Little Rock, Arkansas 72118-5317  
 Phone: (501)682-0626

CODE SHEET

Annual Report

CODE

Auditor's Name

Torrence

Permit Number

AR 0020010

Period Report Covers End Date

12/31/07

PSED

Start Date

1/1/07

PSSD

PPETS WENDB DATA ELEMENTS

Significant IUs in Significant Noncompliance  
with Pretreatment Compliance Schedule

1

SSNC

NOV's and A.O.'s Issued Against  
Significant IUs

1

FENF

Civil and/or Criminal Judicial Actions  
Against Significant IUs

0

JUDI

Significant IUs with Significant Violations  
published in Newspaper

1

SVPU

IUs from which penalties have been collected

0

IUPN

COMMENTS:

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