

# ADEQ

ARKANSAS  
Department of Environmental Quality

October 1, 2009

Denise Georgiou  
Industrial Pretreatment Coordinator  
Operations Management International, Inc.  
1400 North Fox Hunter Road  
Fayetteville, AR 72701

Re: City of Fayetteville Maximum Allowable Headworks Loadings and Water Quality Levels not to be Exceeded (NPDES Permit Numbers AR0020010 and AR0050288 AFIN 72-00102)

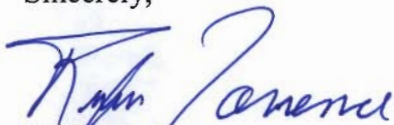
Dear Ms. Georgiou:

The City of Fayetteville existing local limits are based on an Operations Management International document dated May 30, 1995 (Part 2 in the Industrial Pretreatment Program Document). The enclosed final excel spreadsheets (shown in Word format) indicate the current two Publicly Owned Treatment Works' (POTWs') Maximum Allowable Headworks Concentrations (MAHCs), Maximum Allowable Industrial Loadings (MAILs), and Water Quality Standards (WQS) not to be exceeded. The City should review these documents and may use the MAHCs and WQS levels for future annual reports.

Please find enclosed new charts with the current MAHCs and WQS levels for both POTWs (Noland and West POTWs). The City should display MAHCs (and not Maximum Allowable Headworks Loadings-MAHL) on the charts for two reasons. First, the City can compare lab analyses with the MAHCs and, second, the MAHLs are based on a specific plant flow which may not be applicable.

Please contact the Department at 682-0626 or [torrence@adeq.state.ar.us](mailto:torrence@adeq.state.ar.us) if you have questions or concerns.

Sincerely,



Rufus Torrence  
ADEQ Engineer

Enclosures:

1. Fayetteville Noland POTW Technically Based Local Limit Development dated October 1, 2009
2. Fayetteville West POTW Technically Based Local Limit Development dated October 1, 2009
3. AR0020010 Noland POTW Influent / Effluent Chart
4. AR0050288 West POTW Influent / Effluent Chart



(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.



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WQ - "Water Quality Levels not to exceed" OR actual permit limit.



**WQ Limits for the FYVL Noland**

	Aquatic Life
	AML, ug/l
Cadmium Total	7.00
Chromium (hex)	11.81
Copper Total	41.08
Lead Total	18.73
Mercury Total	0.01
Nickel Total	422.02
Selenium Total	5.58
Silver Total	19.95
Zinc Total	372.89
Chromium (Tri)	1255.02
Cyanide Total	5.80
Beryllium Total	5.91
Arsenic	342.39

Pollutant	% Rem****	Water Quality		FYL Noland		MAHC		Inhibition**	Inhibition**	Inhibition**	MAHL	MAHC	Domestic lbs/day	Allocation for %SF lbs/day <sup>a</sup>	MAIL lbs/day	Max Inf Exceeded MAHC	Max Effluent vs WQS(mg/l)
		mg/l	lbs/day	mg/kg	lbs/day	mg/l	lbs/day										
Cadmium Total	67	0.0070	1.71	85	1.89	1.00	80.65	1.00	80.65	1.71	0.02120	0.04	1.28	1.247	No	No	
Copper Total	94	0.0411	55.22	4300	68.22	1.00	80.65	1.00	80.65	55.22	0.68466	3.36	41.41	38.051	No	No	
Lead Total	52	0.0187	3.15	840	24.09	1.00	80.65	1.00	80.65	3.15	0.03902	0.23	2.36	2.125	No	No	
Mercury Total	60	0.00001	0.0027	57	1.42	0.10	8.06	0.10	8.06	0.0027	0.00003	0.0006	0.0020	0.001	No	No	
Nickel Total	33	0.4220	50.7987	420	18.98	1.00	80.65	1.00	80.65	18.98	0.23634	0.54	14.23	13.699	No	No	
Selenium Total	50	0.0056	0.900	100	2.983	0.20	16.13	0.20	16.13	0.900	0.01116	0.35	0.68	0.323	No	No	
Silver Total	55	0.0200	3.58	0	0.00	0.25	20.16	0.25	20.16	3.58	0.04434	0.08	2.68	2.604	No	No	
Zinc Total	70	0.3729	100.2422	7500	159.78	0.300	24.19	0.300	24.19	24.19	0.30000	5.63	18.15	12.520	No	No	
Chromium Total	82	1.2950	562.3026	3000	54.56	1.00	80.65	1.00	80.65	54.56	0.67651	0.70	40.92	40.216	No	No	
Cyanide Total	69	0.0058	1.51	0	0.00	0.10	8.06	0.10	8.06	1.51	0.01872	0.35	1.13	0.781	No	No	
Arsenic	45	0.3424	50.2051	75	2.49	0.10	8.065	0.10	8.065	2.49	0.03082	0.35	1.86	1.512	No	No	
Molybdenum	50	0.0000	0.0000	75	2.237	0.20	16.13	0.20	16.13	2.237	0.02774	0.21	1.68	1.467	No	No	
Beryllium	50	0.005915	0.954	0	0.00	0.10	8.06	0.10	8.06	0.954	0.01183	0.35	0.72	0.364	No	No	
Dry tons/day of sludge ****			7.46	Safety Factor	0.25												

\* lbs/day = mg/l \* 8.34 \* average flow / (1-%Rem)  
 \*\* Page 3-44 of EPA 833B87202 Be est @ 0.10 mg/l  
 + lbs/day = (dry tons/day \* 0.002 \* critria(mg/kg)) / % Rem  
 ++ lbs/day = mg/l \* Flow \* 8.34  
 ^ lbs/day = (1 - SF) \* MAHL  
 MAIL = Maximum allowable industrial loading = Allocation for % SF - Domestic  
 \*\*\*\*Rem Eff from Page 3-56 EPA 833B87202, Be & Mo est @ 50; Cu,Pb, Ni, Ag & Zn from "Rem" spreadsheet in this Workbook  
 \*\*\*\*\* Dry tons/day of sludge based on page 3 of checklist in Audit Report dated January 31, 2007



Fayetteville Noland WWTP Technically Based Local Limits Development  
 FY14 Noland  
 REMOVAL EFFICIENCIES (% REM)

October 1, 2009

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Influent Date	Cadmium	Copper	Lead	Mercury	Nickel	Selenium	Silver	Zinc	Chromium	Cyanide	Arsenic	Molybdenum	Beryllium
02/26/08		0.0570	0.0017		0.0076			0.0015	0.1000				
08/15/08		0.0150	0.0016		0.0659			0.0006	0.0600				
12/06/08		0.0440	0.0034		0.0094			0.0012	0.1200				
12/17/08		0.0370	0.0020		0.0076			0.0013	0.0900				
02/26/07		0.0240	0.0060					0.0006	0.0000				
10/10/07		0.1100						0.0014	0.0200				
<b>Detection Level (DL)</b>													
Average	0.0005	0.0005	0.0005	0.000005	0.0005	0.0050	0.0005	0.0200	0.0100	0.0100	0.0005	0.0100	0.0005
Maximum	#DIV/0!	0.04783	0.00334	#DIV/0!	0.00763	#DIV/0!	0.00110	0.08000	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
All Concs > DL (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>Effluent</b>													
02/26/08		0.0046	0.0005		0.0064			0.0005	0.0440				
08/15/08		0.0038	0.0005		0.0051			0.0005	0.0200				
12/06/08		0.0022	0.0005		0.0049			0.0005	0.0200				
12/17/08		0.0023	0.0005		0.0041			0.0005	0.0200				
02/26/07		0.0060	0.0060					0.0005	0.0200				
10/10/07		0.0016						0.0005	0.0200				
<b>Detection Level</b>													
Average	0.0005	0.0005	0.0005	0.000005	0.0005	0.0050	0.0005	0.0200	0.0100	0.0100	0.0005	0.0100	0.0005
Maximum	#DIV/0!	0.00273	0.0160	#DIV/0!	0.00513	#DIV/0!	0.00050	0.02400	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
All Concs > DL (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>% Rem</b>													
Average	#DIV/0!	94	52	#DIV/0!	33	#DIV/0!	55	70	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
EPA % REM	57	86	61	60	42	50	75	79	82	89	45	50	50

Note: The engineer considered only the pollutants with concentrations in the influent well above the method detection level.

**Domestic Calculations for FYVL Noland**

Pollutants	EPA, P3-59* mg/l	Avg Reported** mg/l	Loading lbs/day
Cadmium Total	0.0030	0.00050	0.04
Copper Total	0.0607	0.04780	3.36
Lead Total	0.0490	0.00334	0.23
Mercury Total	0.0003	0.0000079	0.00056
Nickel Total	0.0210	0.00763	0.54
Selenium Total	-	0.00500	0.35
Silver Total	0.0050	0.00110	0.08
Zinc Total	0.1750	0.08000	5.63
Chromium Total	0.0500	0.01000	0.70
Cyanide Total	0.0410	0.00500	0.35
Arsenic	0.0030	0.00500	0.35
Molybdenum	999999.0000	0.00300	0.21
Beryllium	999999.00	0.00500	0.35

\*EPA Page 3-59 of 633-B87-202

\*\*Domestic concentrations are the smaller of either EPA Typical Levels or average influent values reported in the 2008 Annual Report dated May 2009 except Molybdenum (EPA Method 200.8 Detection Level used for Molybdenum).



<b>WO Limits for the FYVL West</b>	
	Aquatic Life
	AML, ug/l
Cadmium Total	7.00
Chromium (hex)	11.81
Copper Total	41.08
Lead Total	18.73
Mercury Total	0.01
Nickel Total	422.02
Selenium Total	5.58
Silver Total	19.95
Zinc Total	372.89
Chromium (Tri)	1255.02
Cyanide Total	5.80
Beryllium Total	5.91
Arsenic	342.39



		REMOVAL EFFICIENCIES (% REM)												
		FVLA West												
Influent Date		Cadmium	Copper	Lead	Mercury	Nickel	Selenium	Silver	Zinc	Chromium	Cyanide	Arsenic	Molybdenum	Beryllium
06/26/08		0.0430	0.0036	0.0100	0.0021	0.0000	0.0021	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
09/18/08		0.0260	0.0020	0.0056	0.0013	0.0750	0.0013	0.0750	0.0750	0.0750	0.0750	0.0750	0.0750	0.0750
12/12/08		0.0360	0.0016	0.0057	0.0031	0.1100	0.0031	0.1100	0.1100	0.1100	0.1100	0.1100	0.1100	0.1100
Detection Level (DL)		0.0005	0.0005	0.0005	0.00005	0.0005	0.0050	0.0005	0.0200	0.0100	0.0100	0.0005	0.0100	0.0005
Average		#DIV/0!	0.03467	0.00240	#DIV/0!	0.00743	#DIV/0!	0.00217	0.12853	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Maximum		0.0030	0.0420	0.0036	0.0003	0.0100	0.0000	0.0031	0.2000	0.0000	0.0000	0.0000	0.0000	0.0000
All Conc's > DL (Yes/No)		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>Effluent</b>														
Date		Cadmium	Copper	Lead	Mercury	Nickel	Selenium	Silver	Zinc	Chromium	Cyanide	Arsenic	Molybdenum	Beryllium
06/26/08		0.0031	0.0005	0.0037	0.0005	0.0050	0.0050	0.0050	0.0250	0.0250	0.0250	0.0250	0.0250	0.0250
09/18/08		0.0046	0.0005	0.0047	0.0005	0.0310	0.0005	0.0310	0.0310	0.0310	0.0310	0.0310	0.0310	0.0310
12/12/08		0.0034	0.00081	0.0027	0.0005	0.0370	0.0005	0.0370	0.0370	0.0370	0.0370	0.0370	0.0370	0.0370
Detection Level		0.0005	0.0005	0.0005	0.00005	0.0005	0.0050	0.0005	0.0200	0.0100	0.0100	0.0005	0.0100	0.0005
Average		#DIV/0!	0.00303	0.00060	#DIV/0!	0.00370	#DIV/0!	0.00050	0.03100	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Maximum		0.0046	0.0008	0.0008	0.0000	0.0047	0.0000	0.0005	0.0370	0.0000	0.0000	0.0000	0.0000	0.0000
All Conc's > DL (Yes/No)		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
% Rem		Cadmium	Copper	Lead	Mercury	Nickel	Selenium	Silver	Zinc	Chromium	Cyanide	Arsenic	Molybdenum	Beryllium
Average		67	91	75	61	60	42	50	77	76	82	45	50	50
EPA % REM		67	86	61	60	42	50	75	79	82	69	45	50	50

Note: The engineer considered only the pollutants with concentrations in the influent well above the method detection level.

				Domestic Calculations for FYVL West	
Pollutants	EPA, P3-59* mg/l	Avg Reported*** mg/l	Loading lbs/day		
Cadmium Total	0.0030	0.00050	0.02		
Copper Total	0.0607	0.03467	1.47		
Lead Total	0.0490	0.00240	0.10		
Mercury Total	0.0003	0.00847	0.36		
Nickel Total	0.0210	0.00743	0.31		
Selenium Total	-	0.00500	0.21		
Silver Total	0.0050	0.00217	0.09		
Zinc Total	0.1750	0.12833	5.43		
Chromium Total	0.0500	0.01000	0.42		
Cyanide Total	0.0410	0.00500	0.21		
Arsenic	0.0030	0.00050	0.02		
Molybdenum	999999.0000	0.00030	0.01		
Beryllium	999999.00	0.00050	0.02		
*EPA Page 3-59 of 833-B87-202					
***Domestic concentrations are the smaller of either EPA Typical Levels or average influent values reported in the 2008 Annual Report dated May 2009 except Molybdenum (EPA Method 200.8 Detection Level used for Molybdenum).					