



CITY OF
FAYETTEVILLE
ARKANSAS

May 17, 2019

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

**RE: City of Fayetteville 2018 Annual Pretreatment Report
(Permit No. AR0020010, AFIN 72-00781 and AR0050288, AFIN 72-01033)**

Dear Mr. Yates,

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, Ashley Gregg, at 479-443-3292 ext 3 or by email at Ashley.Gregg@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 blue horizontal line.

Tim Nyander
Utilities Director
Utilities Department

Enclosure

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT¹
REPORTING YEAR: January 2018 TO December 2018
TREATMENT PLANT: City of Fayetteville Paul R. Noland WRRF NPDES PERMIT # AR0020010
AVERAGE POTW FLOW: 6.549 MGD % IU FLOW: 13.8%

METALS, CYANIDE, and PHENOLS (Total)	MAHC ² (Total) (µg/L) ³	Influent Dates Sampled (µg/L) Once/quarter				WQ ⁴ level/ limit (µg/L) ³	Effluent Dates Sampled (µg/L) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/L) ⁵	EPA Method Used ⁵	Detection Level Achieved (µg/L)
		03/06/18	05/30/18	08/08/18	10/30/18		03/07/18	06/05/18	08/10/18 ⁶	10/31/18			
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8	60 & 30
Cadmium	21.2	0	0	0	0	7.00	0	0	0	0	0.5	200.8	0.5
Copper	684.66	33	27	14	31	41.08	2.8	2.3	2.2	3.5	0.5	200.8	0.5
Lead	39.02	1.3	2.0	1.7	1.4	18.73	0	0	0	0	0.5	200.8	0.5
Mercury	0.03	0.021	0.035	0.034	0	0.01	0	0	0.0061	0	0.005	245.7	0.0050
Nickel	235.34	5.7	5.1	4.3	6.1	422.02	4.4	3.2	2.7	3.7	0.5	200.8	0.5
Selenium	11.16	0	0	0	0	5.58	0	0	0	0	5	200.8	5 & 2
Silver	44.34	0	0	0	0	19.95	0	0	0	0	0.5	200.8	0.5
Zinc	300.00	89	90	73	110	372.89	0	27	0	0	20	200.8 & 200.7	20 & 10
Chromium	676.51	0	0	0	0	1255.02	0	0	0	0	10	200.8	10
Cyanide	18.72	0	0	0	0	5.80	0	0	0	0	10	SM 4500-CN CE 2011	10 & 5
Arsenic	30.82	1.6	1.1	0	2.5	342.39	0.57	0	0	0.72	0.5	200.8	0.5
Molybdenum	27.74	0	0	0	0	N/A	0	0	0	0	--	200.8	10
Phenols	N/A	27	43	85	65	N/A	0	31	0	6.4	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	7.517	6.083	6.803	4.898	N/A	12.230	6.830	6.120	6.430	N/A	N/A	N/A
2,4-dinitrophenol ⁷	N/A	N/A	N/A	5.4	N/A	N/A	N/A	N/A	0	N/A	N/A	625	5
N-nitroso-di-n-propylamine ⁷	N/A	N/A	N/A	7.2	N/A	N/A	N/A	N/A	0	N/A	N/A	625	5
N-nitrosodimethylamine ⁷	N/A	N/A	N/A	8.3	N/A	N/A	N/A	N/A	0	N/A	N/A	625	5
Phenol ⁷	N/A	N/A	N/A	7.9	N/A	N/A	N/A	N/A	0	N/A	N/A	625	5

¹ 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.

² MAHL - Maximum Allowable Headworks Level / MAHC - Maximum Allowable Headworks Concentration

³ 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.]

⁴ WQ - "Water Quality Levels not to exceed" OR actual permit limit.

⁵ 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.**

⁶ Table II samples collected on 08/09/18.

⁷ 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.

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT⁸
REPORTING YEAR: January 2018 TO December 2018
TREATMENT PLANT: City of Fayetteville West Side WRRF NPDES PERMIT # AR0050288
AVERAGE POTW FLOW: 7.5027 MGD % IU FLOW: 0.0%

METALS, CYANIDE, and PHENOLS (Total)	MAHC ⁹ (Total) (µg/L) ¹⁰	Influent Dates Sampled (µg/L) Once/quarter				WQ ¹¹ level/ limit (µg/L) ¹⁰	Effluent Dates Sampled (µg/L) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/L) ¹²	EPA Method Used ¹²	Detection Level Achieved (µg/L)
		02/14/18	05/15/18	08/22/18	10/23/18		02/15/18	05/16/18	08/23/18	10/24/18			
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	456.44	40	23	18	35	41.08	2.3	1.2	1.5	1.6	0.5	200.8	0.5
Lead	74.91	1.0	0.84	0.98	1.8	18.73	0	0	0	0	0.5	200.8	0.5
Mercury	0.03	0.018	0.051	0.020	0.017	0.01	0	0	0	0	0.005	245.7	0.0050
Nickel	844.04	4.8	5.8	4.5	11	422.02	4.0	4.0	3.1	3.0	0.5	200.8	0.5
Selenium	11.16	0	0	0	0	5.58	0	0	0	0	5	200.8	5
Silver	86.74	0	0	0	0	19.95	0	0	0	0	0	200.8	0.5
Zinc	300.00	170	88	210	170	372.89	28	31	0	20	20	200.8 & 200.7	20
Chromium	1000.0	0	0	0	0	1255.02	0	0	0	0	10	200.8	10
Cyanide	18.72	0	0	0	0	5.80	0	0	0	95 12/18/19 0 ¹³	10	SM4500- CN CE 2011	10
Arsenic	100.0	1.6	2.7	1.3	2.1	342.39	0	0	0	3.9	0.5	200.8	0.5
Molybdenum	200.0	0	0	0	0	N/A	0	0	0	0	--	200.8	10
Phenols	N/A	51	42	38	68	N/A	6.2	34	11	29	5	420.1	5
Beryllium	11.83	0	0	0	0	5.91	0	0	0	0	0.5	200.8 & 200.7	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	5.8846	7.0372	8.3490	6.7327	N/A	6.2350	6.8420	7.8710	6.4570	N/A	N/A	N/A
¹⁴	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

⁸ 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.

⁹ MAHL - Maximum Allowable Headworks Level / MAHC - Maximum Allowable Headworks Concentration

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¹¹ WQ - "Water Quality Levels not to exceed" OR actual permit limit.

¹² 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.**

¹³ Goose Creek was reanalyzed for Total Cyanide to confirm a previous data result. Both data points were reported since methodology and quality control data were valid.

¹⁴ 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.

**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 ¹⁵ (SIU+WRRF/ WRRF sampling)	Compliance Status ¹⁶ (N/A, C, NC, or SNC)					Permit Limits (parameter violated & number of times)	WRRF ¹⁷
			Y or N	Last Action				Reports						
								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	10/01/18 Reissued	No	1	26/1	N/A	N/A	C	C	SNC Chromium:1 daily max & 1 monthly avg	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	NC pH: 1 exceedance	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	
Pinnacle Foods Corporation	2038/311412	N/A	Y	10/01/18 Reissued	No	2	160/4	N/A	N/A	C	C	C	NOL	
Superior Industries International, LLC	3714/336399	40 CFR 433	Y	10/01/18 Reissued	No	2	25/1	N/A	N/A	C	C	C	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	NC pH: 1 exceedance	NOL	

¹⁵ Per Don Morgan (ADEQ) and David Long (EPA) 2/1/2006 Pretreatment Compliance Inspection—include self-monitoring in these data.

¹⁶ 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.


¹⁷ 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		
Elkhart Products Corporation	N/A	Chromium: TRC violation of monthly avg	1	0	0	0	0	\$0	N/A	N/A	C	

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.

<p align="center"><u>I. General Information</u></p> <p>Control Authority: City of Fayetteville 1400 N Fox Hunter Road Fayetteville, AR 72701</p> <p>Contact Person: Bruce Richart, Lab & IPP Director (479) 443-3292</p> <p>NPDES No.: AR0020010 & AR0050288</p> <p>Reporting Period: January 1, 2018 – December 31, 2018</p> <p>Total Categorical IUs: <u>4</u></p> <p>Total Significant Noncategorical IUs: <u>3</u></p> <p>Total Non-Significant (yet permitted) IUs: <u>0</u></p>	<p>The following certification must be signed in order for this form to be considered complete:</p> <p>I certify that the information contained herein is complete and accurate to the best of my knowledge.</p>  <p align="right">05/17/2019</p> <hr/> <p>Tim Nyander Date Utilities Director Authorized Representative</p>
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<u>II. Significant Industrial User Compliance</u>	Significant Industrial Users	
	Categorical	Noncategorical
1) No. of SIUs submitting BMRs/No. Required.....	0 / 0	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	1 / 4	0 / 3
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical).....	1 / 7	
<u>III. Compliance Monitoring Program</u>		
1) No. of Control Documents Issued/No. Required.....	4 / 4	3 / 3
2) No. of Non-sampling Inspections Conducted	5	4
3) No. of Sampling Visits Conducted.....	4	12
4) No. of Facilities Inspected (nonsampling).....	4	3
5) No. of Facilities Sampled	4	3
<u>IV. Enforcement Actions</u>		
1) Compliance Schedules Issued/Schedules Required	0 / 0	0 / 0
2) Notices of Violation Issued to SIUs	1	2
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

2018 Industrial Pretreatment Year

Denise Georgiou retired on March 9, 2018 after almost 28 years of administering the Fayetteville Industrial Pretreatment Program (IPP). The Fayetteville IPP department now consists of Bruce Richart (Lab & IPP Director) and Ashley Gregg (Industrial Pretreatment Coordinator).

Ashley Gregg was awarded Pretreatment Professional 2018 by the Northwest District of the Arkansas Water Works & Water Environment Association. She was also awarded the Arkansas Water Environment Association 2018 Pretreatment Award.

The 2018 Industrial Awareness Seminar was held at the West Side Water Resource Recovery Facility on March 1, 2018. Industry awards were presented by Tim Nyander and introductions by Greg Weeks. Presentations were given on the new Noland permit (Tim Luther), Chlorides (Bruce Richart), Ozone Disinfection (Mayo Miller), and The City of Fayetteville Energy Action Plan (Rachael Shaffner).

In April 2018, the Industrial Pretreatment Staff conducted a brief meeting with Layne Pemberton (ADEQ Enforcement Analyst) to verify that the TBLL (technically based local limits) certification statement was received and met the requirements of the new Noland permit. TBLL certification statement was sent in February to ADEQ to comply with the requirement contained within the new Noland permit.

Notification was received from Tyson of Fayetteville in April regarding replacement of the rotating screen in the pretreatment building. The new screen may reduce Tyson's loading and surcharge fee.

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 Noland WRRF. The MAHL Tracker was created and updated for the West Side WRRF as well.

A Pretreatment Compliance Inspection was conducted by ADEQ on July 17-18, 2018 and included site visits to Pinnacle Foods and Superior Industries. A new industrial user discharge permit application form was approved by Adam Yates (ADEQ) and was sent to the seven permitted industries to begin the process of permit renewals. Industrial waste discharge renewal permits for all seven Fayetteville permitted industries were issued with an effective date of October 1, 2018. A verification email was sent to ADEQ the same day with the permits attached as a follow up to the Compliance Inspection conducted last July.

Pretreatment Department staff attended the annual USEPA Region VI Industrial Pretreatment Conference in Oklahoma City.

Authorization to discharge was not revoked for any 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.

NORTHWEST ARKANSAS Democrat Gazette

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AFFIDAVIT OF PUBLICATION

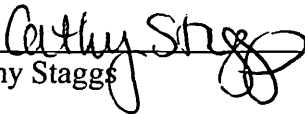
I Cathy Staggs, do solemnly swear that I am the Accounting Manager of the Northwest Arkansas Democrat-Gazette, printed and published in Washington County and Benton County, Arkansas, and of bona fide circulation, that from my own personal knowledge and reference to the files of said publication, the advertisement of:

CITY OF FAYETTEVILLE-WASTEWATER
Significant Non-Compliance

Was inserted in the Regular Edition on:

May 1, 2019

Publication Charges: \$ 55.90


Cathy Staggs

Subscribed and sworn to before me
This 13 day of May, 2019.


Notary Public
My Commission Expires: 2/20/2024

CATHY WILES
Arkansas - Benton County
Notary Public - Commission 12007110
My Commission Expires Feb 20, 2024

****NOTE****

Please do not pay from Affidavit.
Invoice will be sent.

Public Notice of Significant Non-Compliance (SNC). Listed below are industries in SNC as defined in Section 51.082 of the City of Fayetteville Code:
Elkhart Products Corporation (EPC), 3265 Hwy 71 South, Fayetteville, Ark., discharges treated industrial wastewater to the Noland Water Resource Recovery Facility. Violations: During the period from 07/01/2018 through 12/31/2018, the monthly average chromium mass discharge limit was exceeded 67% of the time. This constitutes Technical Review Criteria SNC according to Section 51.082 of the City of Fayetteville Code. Actions taken: A notice of violation was served on EPC. EPC was required to identify the suspected cause of the violation, take corrective measures to abate the violation, and to prevent recurrence. Response: EPC responded to the notice of violation, modified procedures, and conducted additional sampling and analysis to show a return to compliance. Status: EPC is no longer in SNC.
74926256 May 1, 2019