

# Re: City of Fayetteville 2019 Annual Pretreatment Report

Yates, Adam

Mon 8/31/2020 5:38 PM

To: Gregg, Ashley/FAY <Ashley.Gregg@jacobs.com>;

Cc: Healey, Richard <HEALEYR@adeq.state.ar.us>; Ramsey, David <RAMSEY@adeq.state.ar.us>; Allen-Daniel, Leslie <ALLEN-DANIEL@adeq.state.ar.us>; Pemberton, Layne <PEMBERTON@adeq.state.ar.us>;

Ashley,

City of Fayetteville's May 2020 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.

Kindly,

**Adam Yates** | State Pretreatment Coordinator  
**Division of Environmental Quality | Office of Water Quality**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: (501) 682-0617 | e: [yates@adeq.state.ar.us](mailto:yates@adeq.state.ar.us)

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**From:** Gregg, Ashley/FAY <Ashley.Gregg@jacobs.com>  
**Sent:** Friday, May 8, 2020 7:40 AM  
**To:** Yates, Adam  
**Cc:** Pemberton, Layne; Nyander, Tim; Weeks, Greg/FAY; Benton, Matthew/FAY; Luther, Tim/FAY  
**Subject:** City of Fayetteville 2019 Annual Pretreatment Report

Good morning Adam,

Attached is the City of Fayetteville's Annual Pretreatment Report for 2019. Please let me know if you have any questions.

**Ashley Gregg** | [Jacobs](#) | Industrial Pretreatment Coordinator  
479.443.3292 ext 3 | [ashley.gregg@jacobs.com](mailto:ashley.gregg@jacobs.com)  
1400 N Fox Hunter Rd | Fayetteville, AR 72701 | USA

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May 7, 2020

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

**RE: City of Fayetteville 2019 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](mailto: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 positioned above the printed name.

Tim Nyander  
Utilities Director  
Utilities Department

Enclosure

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT<sup>1</sup>**  
**REPORTING YEAR: January 2019 TO December 2019**  
**TREATMENT PLANT: City of Fayetteville Paul R. Noland WRRF NPDES PERMIT # AR0020010**  
**AVERAGE POTW FLOW: 7.660 MGD % IU FLOW: 13.3%**

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)
		02/05/19	04/09/19	07/30/19	12/04/19		02/06/19	04/10/19	07/31/19	12/05/19			
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	<b>39</b>	<b>13</b>	<b>30</b>	<b>18</b>	41.08	<b>2.4</b>	<b>2.9</b>	<b>2.2</b>	<b>2.9</b>	0.5	200.8	0.5
Lead	39.02	<b>1.4</b>	<b>1.1</b>	<b>1.7</b>	<b>0.89</b>	18.73	0	0	0	0	0.5	200.8	0.5
Mercury	0.03	<b>0.023</b>	<b>0.016</b>	0	<b>0.011</b>	0.01	0	0	0	<0.025 <sup>6</sup>	0.005	245.7	0.0050 & 0.025 <sup>6</sup>
Nickel	235.34	<b>5.5</b>	<b>5.4</b>	<b>5.5</b>	<b>5.1</b>	422.02	<b>2.7</b>	<b>3.1</b>	<b>3.5</b>	<b>3.0</b>	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	0	0	19.95	0	0	0	0	0.5	200.8	0.5
Zinc	300.00	<b>97</b>	<b>83</b>	<b>170</b>	<b>72</b>	372.89	0	<b>20</b>	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	<b>1.6</b>	<b>0.97</b>	<b>1.6</b>	<b>21</b>	342.39	0	0	<b>0.53</b>	<b>3.0</b>	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	<b>78</b>	<b>58</b>	<b>58</b>	<b>130</b>	N/A	<b>32</b>	<b>6.7</b>	<b>23</b>	<b>8.0</b>	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	<b>5.603</b>	<b>5.773</b>	<b>9.404</b>	<b>7.307</b>	N/A	<b>7.530</b>	<b>5.230</b>	<b>8.300</b>	<b>10.780</b>	N/A	N/A	N/A
delta-BHC <sup>7</sup>	N/A	N/A	N/A	<b>0.51</b>	N/A	N/A	N/A	N/A	0	N/A	N/A	608.3	0.050

<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.**

<sup>6</sup> Elevated reporting limit for Mercury, low level, is due to matrix interference.

<sup>7</sup> 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 REPORT<sup>8</sup>**  
**REPORTING YEAR: January 2019 TO December 2019**  
**TREATMENT PLANT: City of Fayetteville West Side WRRF NPDES PERMIT # AR0050288**  
**AVERAGE POTW FLOW: 10.159 MGD % IU FLOW: 0.0%**

METALS, CYANIDE, and PHENOLS (Total)	MAHC <sup>9</sup> (Total) (µg/L) <sup>10</sup>	Influent Dates Sampled (µg/L) Once/quarter				WQ <sup>11</sup> level/ limit (µg/L) <sup>10</sup>	Effluent Dates Sampled (µg/L) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/L) <sup>12</sup>	EPA Method Used <sup>12</sup>	Detection Level Achieved (µg/L)
		01/15/19	04/30/19; 05/21/19 <sup>13</sup>	07/16/19	11/13/19		01/16/19	05/01/19, 05/22/19 <sup>13</sup>	07/17/19	11/14/19			
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	13	24	28	14	41.08	1.5	1.3	2.2	2.1	0.5	200.8	0.5
Lead	74.91	0	1.4	1.1	0	18.73	0	0	0	0	0.5	200.8	0.5
Mercury	0.03	0.016	0.052	0	0.018	0.01	0	0	0	0	0.005	245.7	0.0050
Nickel	844.04	3.8	5.4	49	12	422.02	2.6	3.6	23	8.4	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	0.5	200.8	0.5
Zinc	300.00	55	380	200	52	372.89	38	0	0	0	20	200.8 & 200.7	20 & 10
Chromium	1000.0	0	0	190	69	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	10
Arsenic	100.0	0.93	1.6	1.3	7.0	342.39	0	0.59	0	1.4	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	36	740; 80 <sup>13</sup>	39	54	N/A	15	430; <5 <sup>13</sup>	7	<5	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	11.292	8.212; 8.874 <sup>13</sup>	8.273	13.071	N/A	9.502	15.955; 9.985 <sup>13</sup>	7.880	12.100	N/A	N/A	N/A
<sup>14</sup>	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

<sup>8</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>9</sup> MAHL - Maximum Allowable Headworks Level / MAHC - Maximum Allowable Headworks Concentration

<sup>10</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>11</sup> WQ - "Water Quality Levels not to exceed" OR actual permit limit.

<sup>12</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>13</sup> 2<sup>nd</sup> Quarter sampling occurred 04/30/19. Phenols were re-sampled on 05/21/19 to clarify unusual results in comparison to historical data.

<sup>14</sup> 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 <sup>15</sup> (SIU+WRRF/ WRRF sampling)	Compliance Status <sup>16</sup> (N/A, C, NC, or SNC)				Permit Limits (parameter violated & number of times)	WRRF <sup>17</sup>
			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: 2 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	1	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	1	24/1	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	C	NOL

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

<sup>16</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>17</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		
Elkhart Products Corporation	N/A	Chromium: 2 monthly avg	2	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.

#### I. General Information

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

Contact Person: Ashley Gregg, IPP Coordinator  
(479) 443-3292

NPDES No.: **AR0020010 & AR0050288**

Reporting Period: January 1, 2019 –  
December 31, 2019

Total Categorical IUs: 4

Total Significant Noncategorical IUs: 3

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.



Tim Nyander  
Utilities Director  
Authorized Representative

May 7, 2020  
Date

#### II. Significant Industrial User Compliance

Significant Industrial Users	
Categorical	Noncategorical
0 / 0	N/A
0 / 0	N/A
4 / 4	3 / 3
0 / 0	0 / 0
1 / 4	0 / 3
1 / 7	

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

#### III. Compliance Monitoring Program

4 / 4	3 / 3
4	3
4	12
4	3
4	3

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

#### IV. Enforcement Actions

0 / 0	0 / 0
2	2
0	0
0	0
0	0
1	0
\$0 / 0	\$0 / 0
0	0

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

## 2019 Industrial Pretreatment Year

As of July 31, 2019, Bruce Richart (Lab & IPP Director) transferred within the Jacobs company to a project in Florida. The Fayetteville Industrial Pretreatment department now consists of Ashley Gregg (Industrial Pretreatment Coordinator).

Ashley Gregg was awarded the Arkansas Water Environment 2018 Pretreatment Award at the state AWW&WEA conference in Hot Springs in April 2019.

In addition to the Hot Springs conference, other trainings attended included the a "FOG" roundtable hosted by the City of Bentonville, the 2019 Arkansas Water Resources Center Annual Water Conference discussing "Water Management and Nutrient Recovery", Region VI Pretreatment Association's 35<sup>th</sup> annual Pretreatment Conference in Denton, Texas, the NWD AWW&WEA meeting in Fayetteville, and various Jacobs internal webinars. In December, Ashley co-presented a Jacobs internal webinar for pretreatment colleagues providing an introductory overview to metal finishers.

In January, Pretreatment staff met with ADEQ, FTN, and The Southern Company regarding the Baldwin Piano groundwater remediation site to discuss Phase 1. In March, a temporary discharge authorization was granted to discharge recovered groundwater to the City of Fayetteville sewer system after passing analytical thresholds.

A one-time Dental discharger compliance report form was mailed out to all Fayetteville and multi-jurisdictional dentists as directed by the USEPA to reduce discharges of mercury from dental offices. One-time compliance reports to comply with Final Rule 40 CFR 266 Subpart P RCRA Hazardous Waste Pharmaceuticals were also mailed to medical and related facilities.

Pinnacle Foods Corporation was issued a Notice of Violation in August for a "reported slug load (no harm)" of ammonia. They are not permitted for ammonia; therefore, it was not a permit limit exceedance. The ammonia originated from an ammonia-cooled freezer plate malfunction within a freezer. Due to the quick notification, the Noland WRRF was able to divert incoming flow to a storage pond. No NPDES permit violations occurred as a result.

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 a 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

P.O. BOX 1607, FAYETTEVILLE, AR 72702 • 479-442-1700 • FAX 479-695-1118 • WWW.NWADG.COM

## AFFIDAVIT OF PUBLICATION

I, Brittany Smith, do solemnly swear that I am the Accounting Legal Clerk 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  
Notice of Pollution Violations

Was inserted in the Regular Edition on:  
May 1, 2020

Publication Charges: \$55.90

Brittany Smith  
Brittany Smith

Subscribed and sworn to before me  
This 1 day of May, 2020.

Catherine Staggs  
Notary Public  
My Commission Expires: 2/28/2025



**\*\*NOTE\*\***  
Please do not pay from Affidavit.  
Invoice will be sent.

Public Notice of Significant Industrial Pollution Violations. Listed below are significant wastewater discharge violations as defined in Section 51.082 of the City of Fayetteville Code: Elkhart Products Corporation (Elkhart), 3265 Hwy 71 South, Fayetteville, Ark. Violations: The January, June, & August 2019 monthly average chromium mass measurement exceeded permit limits. This resulted in exceeding the technical review criteria from 01/01/19 to 09/30/19. This constitutes significant noncompliance according to Section 51.082 of the City of Fayetteville Code. Actions taken: A notice of violation was served on Elkhart; Elkhart was required to identify the suspected cause of the violation, the corrective measures taken to abate the violation, and measures to prevent recurrence. Response: Elkhart responded to the notice of violation, modified procedures, and conducted additional sampling and analysis to show continued compliance. Status: Elkhart was not in significant noncompliance for any additional periods.  
75264247 May 1, 2020