

City of Fayetteville Pretreatment Annual Report for 2020

Jain, Anmol

Wed 8/18/2021 2:47 PM

To: tnyander@fayetteville-ar.gov <tnyander@fayetteville-ar.gov>;

Cc: McWilliams, Carrie <mcwilliamsc2@adeq.state.ar.us>; Sears, Jessica <Jessica.Sears@adeq.state.ar.us>; Healey, Richard <HEALEYR@adeq.state.ar.us>; Ramsey, David <RAMSEY@adeq.state.ar.us>; Harbin, Danielle <Danielle.Harbin@adeq.state.ar.us>; Manasco, Barry <Barry.Manasco@adeq.state.ar.us>;

Tim,

City of Fayetteville's 2020 Pretreatment Program Annual Report was received, reviewed, and deemed complete according to the reporting requirements of 40 CFR 403.12(i).

Thank you for your submittal. If you have any questions or concerns on this matter, please feel free to contact me or Barry Manasco.

Sincerely,

Anmol Jain | Engineer

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

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0626 | e: anmol.jain@adeq.state.ar.us



CITY OF
FAYETTEVILLE
ARKANSAS

May 17, 2021

Adam Yates, Permit Engineer
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)**

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, John Byrd, at 479-443-3292 ext. 3 or by email at 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".

Tim Nyander
Utilities Director
Utilities Department

Enclosure

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT¹
REPORTING YEAR: January 2020 TO December 2020
TREATMENT PLANT: City of Fayetteville Paul R. Noland WRRF NPDES PERMIT # AR0020010
AVERAGE POTW FLOW: 5.9244 MGD % IU FLOW: 13.0%

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)
		01/15/20	04/15/20	07/21/20	12/01/20		01/16/20	04/16/20	07/22/20	12/02/20			
Antimony	N/A	<60	<60	<60	<60	N/A	<60	<60	<60	<60	60	200.8	60
Cadmium	21.2	<0.5	<0.5	<0.5	<0.5	7.00	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Copper	684.66	15	13	30	31	41.08	2.4	2.1	2.6	2.6	0.5	200.8	0.5
Lead	39.02	0.66	0.93	1.4	0.85	18.73	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Mercury	0.03	0.013	0.014	<0.0050	0.0078	0.01	<0.0050	<0.0050	<0.0050	<0.005	0.005	245.7	0.0050
Nickel	235.34	5.1	4.5	7.9	8.9	422.02	2.4	2.7	3.9	3.6	0.5	200.8	0.5
Selenium	11.16	<5	<5	<5	<5	5.58	<5	<5	<5	<5	5	200.8	5
Silver	44.34	<0.5	<0.5	<0.5	<0.5	19.95	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Zinc	300.00	54	58	130	79	372.89	<20	<20	<20	22	20	200.8	20
Chromium	676.51	<10	<10	<10	<10	1255.02	<10	<10	<10	<10	10	200.8 & 200.7	10
Cyanide	18.72	<10	<10	<10	<10	5.80	<10	<10	<10	<10	10	SM 4500-CN C, E 2011	10
Arsenic	30.82	37	9.1	28	17	342.39	3.1	2.5	1.7	3.1	0.5	200.8	0.5
Molybdenum	27.74	<10	<10	<10	<10	N/A	<10	<10	<10	<10	N/A	200.8	10
Phenols	N/A	110	66	130	140	N/A	<5	<5	<5	<5	5	420.1	5
Beryllium	11.83	<0.5	<0.5	<0.5	<0.5	5.91	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Thallium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Flow, MGD	N/A	8.974	8.325	4.121	4.29	N/A	4.26	7.47	3.97	4.53	N/A	N/A	N/A
n-Nitrosodi-n-propylamine	N/A	N/A	N/A	25	N/A	N/A	N/A	N/A	<20	N/A	20	625.1	20

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.**

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT⁶
REPORTING YEAR: January 2020 TO December 2020
TREATMENT PLANT: City of Fayetteville West Side WRRF **NPDES PERMIT # AR0050288**
AVERAGE POTW FLOW: 8.9225 MGD **% IU FLOW: 0.0%**

METALS, CYANIDE, and PHENOLS (Total)	MAHC ⁷ (Total) (µg/L) ⁸	Influent Dates Sampled (µg/L) Once/quarter				WQ ⁹ level/ limit (µg/L) ⁸	Effluent Dates Sampled (µg/L) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/L) ¹⁰	EPA Method Used ¹⁰	Detection Level Achieved (µg/L)
		01/08/20	04/22/20	09/01/20	11/17/20		01/09/20	04/23/20	09/02/20	11/18/20			
Antimony	N/A	<30	<60	<60	<60	N/A	<30	<60	<60	<60	60	200.8	60 & 30
Cadmium	21.2	<0.5	<0.5	<0.5	<0.5	7.00	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Copper	456.44	6.1	15	30	17	41.08	2.2	1.8	2.1	1.5	0.5	200.8	0.5
Lead	74.91	<0.5	0.54	1.0	0.65	18.73	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Mercury	0.03	0.035	0.023	<0.0050	<0.0050	0.01	<0.0050	<0.0050	0.0096	<0.0050	0.005	245.7	0.0050
Nickel	844.04	3.5	4.3	6.2	5.4	422.02	6.2	3.3	3.0	3.6	0.5	200.8	0.5
Selenium	11.16	<2	<5	<5	<5	5.58	<2	<5	<5	<5	5	200.8	5 & 2
Silver	86.74	<0.5	<0.5	<0.5	<0.5	19.95	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Zinc	300.00	40	68	130	79	372.89	22	24	<20	<20	20	200.8 & 200.7	20 & 10
Chromium	1000.0	<10	<10	<10	<10	1255.02	<10	<10	<10	<10	10	200.8	10
Cyanide	18.72	<10	<10	<10	<10	5.80	<10	<10	<10	11	10	SM4500-CN C, E 2011	10
Arsenic	100.0	34	16	22	14	342.39	1.5	1.4	1.4	2.3	0.5	200.8	0.5
Molybdenum	200.0	<10	<10	<10	<10	N/A	<10	<10	<10	<10	--	200.8	10
Phenols	N/A	110	77	200	83	N/A	<5	<5	30	<5	5	420.1	5
Beryllium	11.83	<0.5	<0.5	<0.5	<0.5	5.91	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Thallium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Flow, MGD	N/A	7.123	8.344	7.6724	6.8396	N/A	7.277	9.95	8.969	6.453	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	N/A	N/A	N/A	N/A

⁶ 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.

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⁸ 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.]

⁹ WQ - "Water Quality Levels not to exceed" OR actual permit limit.

¹⁰ 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.**

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 ¹¹ (SIU+WRRF/ WRRF sampling)	Compliance Status ¹² (N/A, C, NC, or SNC)					WRRF ¹³
			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	SNC (TRC) Chromium: 2 monthly avg; 2 pH: 1 NOV	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
Superior Industries International, LLC	3714/336399	40 CFR 433	Y	12/21/20 Voided	No	1	4/1	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

¹¹ Per Don Morgan (ADEQ) and David Long (EPA) 2/1/2006 Pretreatment Compliance Inspection—include self-monitoring in these data.

¹² 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.

¹³ 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	
Elkhart Products Corporation	N/A	pH: 2 exceedances (same day)	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.

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, 2020 –
December 31, 2020

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 17, 2021
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
3	0
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.)

2020 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.

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 in 2019. Final notices were issued to dental providers that have yet to complete the one-time compliance report regarding the EPA dental amalgam rule that has a deadline of July 14th, 2020.

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 end of January and were due back to the IPP coordinator by the end of February. At the end of February, there was a 53% remittance rate. The IPP coordinator will be reaching out to users that did not complete the survey and determining if any follow-up is needed for submitted surveys.

Elkhart Products Corporation had, during the months of January, March, April, & June 2020, monthly average chromium mass measurements that exceeded their permit limits. This resulted in exceeding the technical review criteria from 01/01/20 to 09/30/20. This constitutes significant noncompliance according to Section 51.082 of the City of Fayetteville Code. A notice of violation was served on Elkhart during January and June of 2020; Elkhart was required to identify the suspected cause of the violation, the corrective measures taken to abate the violation, and measures to prevent recurrence for each notice of violation served. Elkhart responded to the notice of violations, modified procedures, and conducted additional sampling and analysis to show continued compliance. Elkhart was not in significant noncompliance for any additional periods during the year.

American Air Filter was issued two Notice of Violations in violation of ordinance #51.075(B)(1) - pollutants discharged caused interference with operations of the WRRF (dye). First response from American Air Filter regarding their Notice of Violation in violation of ordinance #51.075(B)(1), pollutants discharged caused interference with operations of the WRRF (dye) in March, was re-directing exterior water to a holding tank and treating in the tank before releasing. Response for the second NOV, which resulted from the same code violation, was that they have had an initial meeting with BlueInGreen to see if ozone can treat (de-colorize) their wastestream. They found that their current method of treatment (bleach) does not work as well on the

red/orange dyes because it is manufactured using solid particles unlike the blue/green food grades dyes.

At the request of Superior Industries International Arkansas LLC, Fayetteville industrial permit #FAY09 was voided. The categorical processes that triggered permitting have been removed from the Superior Industries International, LLC facility at 1901 Borick Drive. In accordance with Title V, Chapter 51, Article III, 51.078(F) of the Fayetteville Code of Ordinances, Permit Number FAY09 has been voided as of 12/21/2020. Superior ceased all aluminum wheel manufacturing processes on November 11, 2019. On, or about, December 13, 2019 all process pretreatment tanks were neutralized and discharged in accordance with permit FAY09.

Industrial Pretreatment Coordinator, Ashley Gregg, took a promotion within Jacob's in November, with the Compliance and Reporting Group. John Byrd has filled the position of Industrial Pretreatment & Environmental Compliance Coordinator. John graduated with a Bachelor of Arts in Biology and has over five and a half years of both wastewater sampling/chemistry and food chemistry experience.

NORTHWEST ARKANSAS Democrat Gazette

P.O. BOX 1607, FAYETTEVILLE, AR 72702 • 478-442-1700 • FAX 478-945-1175 • WWW.NWAGG.COM

AFFIDAVIT OF PUBLICATION

I, Brittany Smith, do solemnly swear that I am the Accounting Legal Clerk of the Northwest Arkansas Democrat-Gazette, a daily newspaper printed and published in said County, State of Arkansas; that I was so related to this publication at and during the publication of the annexed legal advertisement the matter of: Notice pending in the Court, in said County, and at the dates of the several publications of said advertisement stated below, and that during said periods and at said dates, said newspaper was printed and had a bona fide circulation in said County; that said newspaper had been regularly printed and published in said County, and had a bona fide circulation therein for the period of one month before the date of the first publication of said advertisement; and that said advertisement was published in the regular daily issues of said newspaper as stated below.

City of Fayetteville
Notice of Pollution Violations

Was inserted in the Regular Edition on:
May 12, 2021

Publication Charges: \$55.90

Brittany Smith
Brittany Smith

Subscribed and sworn to before me
This 12 day of May, 2021.

Cathy Wiles
Notary Public
My Commission Expires: 2/20/24

Cathy Wiles
Benton COUNTY
NOTARY PUBLIC - ARKANSAS
My Commission Expires 02-20-2024
Commission No. 12397118

****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, February, March, April, & June 2020 monthly average chromium mass measurement exceeded permit limits. This resulted in exceeding the technical review criteria from 01/01/20 to 09/30/20. 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.
75446080 May 12, 2021