### Gage, Hannah

From: Gilliam, Allen

**Sent:** Tuesday, August 30, 2016 12:24 PM

To: 'Tom Myers'

Cc: Steven Gorszczyk; Jack Harrison; Jessica Strickland; Renea Ellis; Gage, Hannah;

Leamons, Bryan; Yates, Adam; Ramsey, David; Kaelin, Cynthia; Healey, Richard;

Anderson, Alan; Johnson, Miles

**Subject:** AR0020273\_Siloam Springs August 2016 annual Pretreatment Program report\_

20160830

**Attachments:** 2015-2016 ANNUAL PRETREATMENT REPORT.PDF

Tom,

Siloam Springs' August 2016 annual Pretreatment report (attached) was electronically received, reviewed and deemed incomplete per 40 CFR 403.12(i).

Section IV on Page 2 of Attachment A does not list Sager Creek in significant non-compliances (SNC). SNC criteria in 40 CFR 403.8(f)(2)(viii)(C) include, "Any other violation of a Pretreatment Standard or Requirement as defined by 40 CFR 403.3(I) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW determines has caused, alone or in combination with other Discharges, Interference or Pass Through".

It's this office's interpretation Sager Creek's September 2015 slug load of extra strength organic matter which caused the City's POTW to exhibit pass through and interference clearly meets the above criteria.

Please reply in a return email within 10 days from the date on this correspondence why the City did not place Sager Creek in SNC or publish them as such and this pass through event in the local newspaper per 40 CFR 403.8(f)(2)(viii).

Side note: the fourth quarter (6/29/16) analysis for Hg exceeds the calculated Hg end of pipe WQ level calculated by ADEQ personnel. Please adhere closely to "common sense" clean sampling techniques to avoid contamination. It would be advisable sample/analyze Hg more often than quarterly to ensure the 0.044  $\mu$ g/L was (hopefully) an anomaly or a mercury minimization program may become necessary for the City to not see a Hg limit in a future permit. Three of the four quarters' influent sampling showed excursions of the calculated Hg maximum allowable headworks concentrations (MAHC) and it appears there's a mistake in the spreadsheets' removal efficiency.

Sincerely,

Allen Gilliam ADEQ State Pretreatment Coordinator 501.682.0625

E/NPDES/NPDES/Pretreatment Reports

From: Tom Myers [mailto:tmyers@siloamsprings.com]

Sent: Tuesday, August 30, 2016 8:12 AM

To: Gilliam, Allen

Cc: Steven Gorszczyk; Jack Harrison; Jessica Strickland; Renea Ellis

Subject: Pretreatment Annual Report 2015-2016

### Allen,

Here attached is the annual Pretreatment Report 2015-2016.

Sincerely,

Thomas A. Myers
Wastewater Superintendent
City of Siloam Springs
Ph:479-524-5623
Cell:479-228-0934
tmyers@siloamsprings.com



August 29, 2016 Certified Mail

Mr. Allen Gilliam Water Division Engineer NPDES Branch, ADEQ 5301 Northshore Drive North Little Rock, AR 72118-5317

RE: Siloam Springs, 2015/2016 Annual Pretreatment Performance Summary NPDES Permit #AR0020273

Dear Mr. Gilliam:

The enclosed report covers the 2016 annual pretreatment report for our NPDES Permit # AR0020273. The 2016 report covers the reporting period of July 1, 2015 thru June 30, 2016. The 2016 annual performance reports meet all applicable requirements of 40 CFR Part 403.12(I) and the applicable requirements of the City's NPDES permit.

The City of Siloam Springs would like to report that none of its permitted industrial users met the criteria of significant non-compliance as defined in 40 CFR 403.8.

One (1) interference, pass through, upset, or POTW permit violations was known or suspected to have been caused by industrial contributors during the reporting period.

If you have any questions or comments regarding the 2016 annual report, or if you need additional information, please feel free to contact me at (479)-524-5623.

Sincerely,

Thomas A. Myers

Wastewater Superintendent

Cc: Steve Gorszczyk, Water/Wastewater Manager

Renea Ellis, City Clerk Wastewater File

### MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

# REPORTING YEAR: \_July\_1\_, 2015 TO \_\_June\_30\_, \_2016\_ TREATMENT PLANT: City of Siloam Springs \_\_NPDES PERMIT #AR0020273

AVERAGE POTW FLOW: 3.15MGD	% IU FLOW: 34 <u>.2%</u>
----------------------------	--------------------------

METALS,	МАНС		INFLUENT DA	ATES SAMPLE	WQ level/	E	EFFLUENT DA	TES SAMPL	ED	LABORATORY ANALYSIS			
CYANIDE and PHENOLS	(Total) (μg/l) (2)		Once	/quarter		limit (μg/l)		Once/	quarter	EPA MQL	EPA Method	Detection Level	
	(=)	Date	Date	Date	Date	(2)	Date	Date	Date	Date	(μg/l) (1)	Used (1)	Achieved (μg/l)
		8/3/15	10/27/15	2/23/16	6/28/16		8/4/15	10/28/15	2/24/16	6/29/16			
Antimony	N/A	ND	ND	ND	ND	N/A	ND	.340	ND	.380	60	200.8	.060
Cadmium	3.42	ND	ND	ND	ND	1.08	ND	ND	ND	ND	0.5	200.8	.040
Copper	106.49	22.4	18.3	32.0	31.8	12.97	.68	4.72	3.76	.76	0.5	200.8	.060
Lead	6.92	ND	ND	1.20	1.20	2.7	ND	.500	.780	.340	0.5	200.8	.020
Mercury	.03	.045	.033	.027	.072	.01339	.0021	<.005	.009	.044	.005	245.7	.0018
Nickel	297.99	2.80	4.90	4.00	2.60	165.86	1.32	2.80	2.22	2.00	0.5	200.8	.100
Selenium	10.0	ND	1.80	ND	1.7	5	ND	ND	ND	ND	5	200.8	.400
Silver	15.4	ND	ND	ND	ND	3.85	ND	ND	ND	ND	0.5	200.8	.160
Zine	330.87	89.6	108	102	107	110.28	9.88	50.8	44.8	33.7	20	200.8	1.00
Chromium	314.66	.800	1.90	1.50	ND	50	.100	.220	.440	.260	10	200.8	.100
Cyanide	18.72	ND	ND	ND	ND	5.8	ND	ND	ND	ND	10	4500CN B,E-1999	.010
Arsenic	100	.600	ND	ND	1.8	190	ND	.300	.220	.440	0.5	200.8	.040
Molybdenum	200	ND	4.80	9.50	7.40	N/A	2.5	3.64	6.56	10.3		200.8	.100
Phenols	N/A	.027	0.03	.032	.016	N/A	ND	ND	ND	ND	5	420.1/1978	.005
Beryllium	11.83	ND	ND	ND	ND	5.915	ND	ND	ND	ND	0.5	200.8	.060
Thallium	N/A	ND	ND	ND	ND	N/A	ND	ND	ND	ND	0.5	200.8	.100
Flow, MGD	N/A					N/A							
(3)									JA .				
		2											

				Carating and a second				
	2					 		

- (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 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.
- (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.

### ATTACHMENT A

## PRETREATMENT PROGRAM STATUS REPORT UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

			Control Document				Times Sampled		Permit Limits			
Industrial User Name	NAICS Code	40 CFR XXX			New User	Times Inspected				(include parameter		
		or N/A	Y/N	Last Action				BMR	90-day Compliance	Semi Annual	Self Monitoring	and # of violations)
COBB-VANTRESS	254	N/A	Y	6/29/16	N	1	1	N/A	С	С	С	Y
GATES RUBBER	3052	428	Y	6/24/16	N	1	1	N/A	С	С	С	Y
SIMMONS FOOD	2015	N/A	Y	6/30/16	N	1	1	N/A	С	С	С	Y
SAGER CREEK FOOD	311421- 311422	N/A	Y	6/29/16	Y	1	1	N/A	С	С	С	Y
		1,	de T			eta es				n ya	de la consti	
										1-		
												148.5
							770 K					

# ATTACHMENT B SIGNIFICANT VIOLATIONS - ENFORCEMENT ACTIONS TAKEN

Industrial User	Nature of Violation			Numbe	r of Act	ion Taken		Penalties	Compliance Schedule		Curren	Comments
Name	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other	Collected	Date Issued	Date Due	Status	Connecties
COBB-VANTRESS	254	N/A	1	0	0	0	0	0	С	С	С	И
GATES RUBBER	3052	428	3	0	0	0	0	0	С	С	С	N
SIMMONS FOOD	2015	N/A	4	0	0	0	0	0	С	С	С	N
SAGER CREEK FOOD	311421- 311422	N/A	1	1	0	0	0	0	С	С	С	N
	7											
											217	
					-						-	
		1.0										125

### ATTACHMENT C

## PRETREATMENT PERFORMANCE SUMMARY (PPS)

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 NameCITY OF SILOAM SPRINGS	
Address 975 Anderson Avenue, P.O. Box 80	-
City Siloam Springs State/Zip Arkansas / 72761	
Contact Person Thomas A. Myers Position Superintendent	Facility
Contact Telephone _479-524-5623 NPDES Permit NosAR0020273	
Reporting Period July 1, 2015 June 30, 2016	
(Beginning Month and Year) (Ending Month and Year)	ear)
Total Number of Categorical IUs	
Total Number of Significant Noncategorical IUs3	
Total Number of Non-Significant (yet permitted) IUs	
II. Significant Industrial User Compliance	
SIGNIFICANT INDUSTRIA  Categorical NonCate	
1) No. of SIUs Submitting BMRs/Total No. Required	N/A*
2) No. of SIUs Submitting 90-Day Compliance Reports/No. Required	N/A*
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required	3/3
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule 0/0 * Sager Creek Foods	_1/1_
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs	0/3
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	

### III. Compliance Monitoring Program

	SIGNIFICANT	INDUSTRIAL USERS
	Categorical	NonCategorical
1) No. of Control Documents Issued/Total No.		
Required		3/3
2) No. of Nonsampling Inspections Conducted.	. 1/1	3/3
3) No. of Sampling Visits Conducted	1/1_	3/3
4) No. of Facilities Inspected (nonsampling)	1/1_	3/3
5) No. of Facilities Sampled	1/1_	_3/3_
IV. Enforcement Act	ions	

			INDUSTRIAL USERS NonCategorical
1)	No. of Compliance Schedules Issued/No. of Schedules Required	0/0	1/1
2)	No. of Notices of Violations Issued to SIUs	3	6
3)	No. of Administrative Orders Issued to SIUs	0	_ 1
4)	No. of Civil Suits Filed	0	0
5)	No. of Criminal Suits Filed	0	0
6)	No. of Significant Violators (attach newspaper publication)	0	0
7)	Amount of Penalties (not surcharges) Collected (total dollars/IUs assessed) *Sager Creek Foods	0/0	1/\$75,229.10
8)	Other Actions (sewer bans, etc.) *Sager Creek Foods	0	1

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.

Authorized Representative