

Gage, Hannah

From: Gilliam, Allen
Sent: Tuesday, August 30, 2016 12:24 PM
To: 'Tom Myers'
Cc: Steven Gorszcyk; 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(l) (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 µg/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 Gorszcyk; 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

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 Name CITY OF SILOAM SPRINGS

Address 975 Anderson Avenue, P.O. Box 80

City Siloam Springs State/Zip Arkansas / 72761

Contact Person Thomas A. Myers Position Water Pollution Control Facility Superintendent

Contact Telephone 479-524-5623 NPDES Permit Nos. AR0020273

Reporting Period July 1, 2015 June 30, 2016

(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 1

Total Number of Significant Noncategorical IUs 3

Total Number of Non-Significant (yet permitted) IUs 0

II. Significant Industrial User Compliance

		<u>SIGNIFICANT INDUSTRIAL USERS</u>	
		<u>Categorical</u>	<u>NonCategorical</u>
1)	No. of SIUs Submitting BMRs/Total No. Required.	<u>0/0</u>	<u>N/A*</u>
2)	No. of SIUs Submitting 90-Day Compliance Reports/No. Required.	<u>0/0</u>	<u>N/A*</u>
3)	No. of SIUs Submitting Semiannual Reports/ Total No. Required.	<u>1/1</u>	<u>3/3</u>
4)	No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule * Sager Creek Foods	<u>0/0</u>	<u>1/1</u>
5)	No. of SIUs in Significant Noncompliance/ Total No. of SIUs	<u>0/1</u>	<u>0/3</u>
6)	Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .		<u>0/4</u>

III. Compliance Monitoring Program

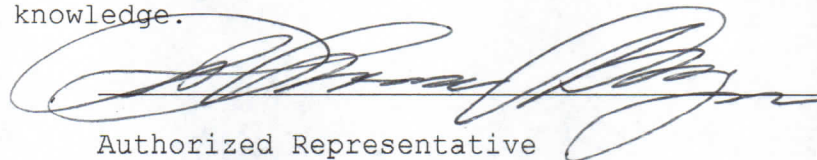
	<u>SIGNIFICANT INDUSTRIAL USERS</u> <u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued/Total No. Required.	<u>1/1</u>	<u>3/3</u>
2) No. of Nonsampling Inspections Conducted. .	<u>1/1</u>	<u>3/3</u>
3) No. of Sampling Visits Conducted.	<u>1/1</u>	<u>3/3</u>
4) No. of Facilities Inspected (nonsampling) .	<u>1/1</u>	<u>3/3</u>
5) No. of Facilities Sampled	<u>1/1</u>	<u>3/3</u>

IV. Enforcement Actions

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

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 _____ Date 8/29/16