

Peltier, Hannah

From: Gilliam, Allen
Sent: Wednesday, April 15, 2015 3:36 PM
To: Steven Gorszczyk
Cc: Tom Myers; Fuller, Kim; Peltier, Hannah
Subject: AR0020273_Siloam Springs notification of permit limits change to Simmons Industries_20150415
Attachments: Signed Letter to Allen Gilliam.pdf

Steve,

The actions you've outlined in the attached does not appear to be contrary to the Federal Pretreatment Regulations in modifying Simmons' concentration based limits to mass based along with a flow limitation.

If 40 CFR 403.18(b)(1)-(7) criteria were met via changes in Siloam Springs' permit activities to Simmons, the City would have to make a substantial modification to its Program and notify ADEQ. This office cannot locate conventional technically based local limits for Siloam Springs' industries.

Thank you for notifying this office of Simmons' permit limit changes. Please keep your rationale for this change in Simmons' file for future reference.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Steven Gorszczyk [<mailto:sgorszczyk@siloamsprings.com>]
Sent: Wednesday, April 08, 2015 10:31 AM
To: Gilliam, Allen
Cc: Tom Myers
Subject: Simmons Industries

Allen,

Attached is a letter to inform you of the City's activities with Simmons Industries that resulted in a Compliance Order being issued by the City to Simmons. A hard copy of the letter has been mailed as well.

The Order will ultimately change Simmons' permit to a mass limit for BOD and require increased monitoring. The revised permit is anticipated to become effective on May 31, 2015.

Please contact me if there are any questions.

Thanks,

Steve Gorszczyk
Water/Wastewater Manager

City of Siloam Springs
479-238-0935 Office
479-228-4888 Cell
sgorszczyk@siloamsprings.com





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Siloam Springs
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April 8, 2015

Mr. Allen Gilliam
State Pretreatment Coordinator
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Siloam Springs Pretreatment Program Implementation – Simmons Industries

Dear Mr. Gilliam:

This letter is to provide ADEQ information regarding implementation of the Siloam Springs approved Pretreatment Program. Industrial User Simmons Industries has requested review of the Biological Oxygen Demand discharge limits in its Wastewater Discharge Permit 001. Simmons has informed the City of changes in operations and in discharge flow that result in an 80% decrease in flow and an average 70% decrease in BOD mass discharge. Simmons has provided the City information demonstrating that recent exceedances of the Wastewater Discharge Permit BOD concentration limits are a function of lower flow resulting in more concentrated BOD levels in the discharge. Simmons has requested a permit modification to provide a maximum daily flow of 0.50 MGD and a maximum BOD limit of 2085 lbs/day.

Since September 2014, the City has issued four Notices of Violation to Simmons Industries for BOD, TSS and pH exceedances. Through the conference and conciliation process under the City's Enforcement Response Plan including requests for information from Simmons and requests for implementation of enhanced BMPs, the City gained the information summarized in the first paragraph above. This information demonstrates that although Simmons was in violation of the BOD concentration based limits in its Wastewater Discharge Permit, BOD loading discharged to the City actually has significantly decreased. The City will leave the NOVs in place and will be publishing Simmons as in Significant Noncompliance in May in accordance with the requirements of the City's NPDES permit and Ordinance section 98-701.

To address the changed operations and to provide an interim BOD discharge limit pending a permit modification, the City intends to use its authority under Industrial Pretreatment Ordinance section 98-764 to issue a compliance order to Simmons Industries. The Compliance Order will impose a deadline for Simmons Industries to file a permit modification application to reflect the changes in operations and discharge and to request modification of the BOD limits in the Simmons existing Wastewater Discharge Permit. If the application is in order and supports the modification, the City intends to use its authority under Siloam Springs Industrial Pretreatment Ordinance section 98-588 to provide a draft modified permit for review that incorporates a 0.50 MGD flow limit, a BOD daily maximum of 2085 lbs/day, and that requires weekly monitoring of BOD, TSS, and pH.

Mr. Allen Gilliam
March 24, 2015
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The City is providing the above information in order to keep ADEQ and you as our pretreatment inspector, apprised of the City's action in this matter.

Sincerely,



Steve Gorszcyk
City of Siloam Springs
Water and Wastewater Manager

Cc: Phillip Patterson, City Administrator
Don Clark, Community Services Director
Renea Ellis, City Clerk
Tom Myers, Wastewater Superintendent