

From: [Jamie Belcourt \(adpce.ad\)](#)
To: "Anthony Brown"
Cc: "[Steven Gorszczyk](#)"; [Stacie Wassell \(adpce.ad\)](#); [Richard Healey \(adpce.ad\)](#); [David Ramsey \(adpce.ad\)](#)
Subject: RE: Annual Pretreatment Report 2021-2022
Date: Tuesday, September 27, 2022 9:07:08 AM
Attachments: [image003.png](#)
[image004.png](#)
[June 1 2021 to July 31 2022 pretreatment-annual-report \(1\).pdf](#)
[image005.png](#)

Anthony,

The City of Siloam Springs' June 2021 through July 2022 Pretreatment Program Annual Report was received and reviewed.

Attachments A and C of the report indicate that one (1) of the City's three (3) significant industrial users (SIUs) were inspected for the 2021-2022 reporting year. During a follow-up conversation via phone on 9/1/2022, it was determined that two (2) SIUs were not inspected.

Per the EPA Memorandum (1990) on "*Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements*" (https://www.epa.gov/system/files/documents/2021-07/1990_potw_noncompliance_guidance.pdf), the City meets one (1) of the Level II Criteria for failure to inspect or sample SIUs. The guidance states that if the POTW has failed to either inspect or sample at least 80% of the SIUs as required by the permit or the approved program, the POTW should be reported on the Quarterly Noncompliance Report (QNCR).

If you have any questions or concerns, please feel free to contact me.

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
Policy and Administration

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ARKANSAS
ENERGY & ENVIRONMENT

From: Belcourt, Jamie
Sent: Monday, August 29, 2022 4:18 PM
To: 'Anthony Brown'
Cc: Steven Gorszczyk; Wassell, Stacie
Subject: RE: Annual Pretreatment Report 2021-2022

Hello,

In regards to your annual pretreatment report for NPDES Permit #AR0020273, Part III – Compliance Monitoring Procedures indicates that a categorical industrial user (Gates Rubber) and a significant non-categorical industrial user (Cobb-Vantress) were not inspected over the reporting period. Is this information correct?

If it is correct, please provide details on why these IU's were not inspected.

Thank you,

Jamie Belcourt | Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
5301 Northshore Drive | North Little Rock, AR 72118
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ARKANSAS
ENERGY & ENVIRONMENT

From: Anthony Brown [mailto:abrown@siloomsprings.com]
Sent: Monday, August 22, 2022 2:53 PM
To: Pretreatment-Submittals
Cc: Steven Gorszcyk
Subject: Annual Pretreatment Report 2021-2022

Dear State Representative,

The attached report covers the 2021-2022, annual pretreatment report for NPDES Permit # AR0020273. The report covers the reporting period of June 1, 2021, thru July 31, 2022. The 2021-2022, annual performance report meets 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.

No interference, pass through, upset, or POTW permit violations were known or suspected to have been caused by an industrial contributor during this reporting period.

If you have any questions or concerns regarding the 2021-2022, annual report, or if you need additional information, please feel free to contact me at (479) 524-5623.

Respectfully submitted,

Tony Brown

Wastewater Superintendent

Pretreatment Coordinator

975 Anderson Avenue, Siloam Springs, AR 72761

Plant: 479-524-5623

Cell: 479-228-2000

abrown@siloamsprings.com



(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 TBLI 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

Industrial User Name	SIC/NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (N/A, C, NC, or SNC)				Permit Limits (Denote parameter violated & number of times)
			Y/N	Last Action				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	
COBB-VANTRESS	254	N/A	Y	4/13/22	N	0	1	N/A	C	C	C	Y
GATES RUBBER	3052	428	Y	3/4/22	N	0	1	N/A	C	C	C	Y
SIMMONS FOOD	2015	N/A	Y	4/25/22	N	1	1	N/A	C	C	C	Y

Include NAICS code(s) 3rd column - include the CFR # only if the Category has Pretreatment Standards (numeric or narrative) Please footnote N/A reason

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 72761

Contact Person Tony Brown Position Wastewater Superintendent

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

Reporting Period June 1, 2021 July 31, 2022

(Beginning Month, day, and Year) (Ending Month, day, and Year)

Total Number of Categorical IUs 1

Total Number of Significant Noncategorical IUs 2

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>2 /2</u>
4) No. of SIUs Meeting Compliance Schedule / Total No. Required to Meet Schedule	<u>0/0</u>	<u>0/0</u>
5) No. of SIUs in Significant Noncompliance / Total No. of SIUs	<u>0/0</u>	<u>0/0</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical) ...	<u>0/3</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>2/2</u>
2) No. of Non-sampling Inspections Conducted / Total No. Required.	<u>1/1</u>	<u>2/2</u>
3) No. of Sampling Visits Conducted / Total No. Required.	<u>1/1</u>	<u>2/2</u>
4) No. of Facilities Inspected (nonsampling) / Total No. Required.	<u>0/1</u>	<u>1/2</u>
5) No. of Facilities Sampled / Total No. Required.	<u>1/1</u>	<u>2/2</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>0/0</u>
2) No. of Notices of Violations Issued to SIUs	<u>0</u>	<u>0</u>
3) No. of Administrative Orders Issued to SIUs	<u>0</u>	<u>0</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) Number of Penalties (not surcharges) Collected (total dollars/IUs assessed) . . .	<u>0/0</u>	<u>0/0</u>
8) Other Actions (sewer bans, etc.)	<u>0</u>	<u>0</u>

The following certification must be signed 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 August 22, 2022