

# ADEQ

ARKANSAS  
Department of Environmental Quality

DEC 3 2012

Michael Sims  
Wastewater Superintendent  
City of De Queen  
P O Box 730  
De Queen, AR 71832

Re: City of De Queen (NPDES #AR002733) Pretreatment Program  
Audit & Treatment Plant Assessment

Dear Mr. Sims:

Please find enclosed the finished report for the audit and assessment conducted October 16 through October 17, 2012. The report should be made available for review to appropriate City and industrial officials.

The Department has reviewed the new treatment plant performance and the impact of the sole SIU on the plant. The review reveals that the plant is performing as designed and with no chronic pass-through. Therefore, the Department has decided to remove the requirement in the City's NPDES permit to operate an industrial pretreatment program. The City should closely review the Department's rationale and decision. The appropriate City official must respond in writing within thirty (30) working days from the date on this correspondence to confirm or contest the Department's decision.

The Department appreciates the City's cooperation during this audit and assessment.

If any City official has questions or concerns, please contact Rufus Torrence at (501) 682-0626 or [torrence@adeq.state.ar.us](mailto:torrence@adeq.state.ar.us).

Sincerely,



Mo Shafii  
Assistant Chief  
Water Division

MS/rt

Encl: Audit/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)  
ADEQ Inspection Branch Manager (w/o attmt)  
Craig Uyeda / ADEQ Enforcement Branch Manager (w/o attmt)

***PRETREATMENT PROGRAM AUDIT***

***POLLUTION PREVENTION ASSESSMENT***

***DE QUEEN, ARKANSAS***

***NPDES PERMIT #AR0021733***

***October 24, 2012***

***AUDITOR: RUFUS TORRENCE***

***WATER DIVISION ENGINEER II***

***ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY***

***5301 Northshore Drive***

***NORTH LITTLE ROCK, ARKANSAS 72118***

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## ***LIST OF ATTACHMENTS***

### Pretreatment Program Audit/Assessment Checklist:

- Section I: General Information
- Section II: Program Analysis and Profile
- Section III: Industrial User File Review
- Reportable Noncompliance (RNC) Worksheet
- SIU Site Visit Summary

### Attachments: Supporting Documentation

- A - Application for Industrial Waste Permit-Pilgrim
- B - Discharge Permit-Pilgrim
- C - Industrial Inspection Report-Pilgrim
- D - Influent Monitoring Results for WWTP
- E - Noncompliance Report for Ammonia
- F - ICIS Violation Report-WWTP
- G - WET Results- Arkansas Analytical Test and Retest-WWTP
- H - WET Summary-WWTP
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## A) INTRODUCTION

Synopsis: Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

Since the Department is contemplating removing the City's NPDES permit requirement to operate an industrial pretreatment program, the auditor evaluated the new treatment plant performance. With Pollution Prevention (P2) being integrated into Pretreatment Programs, the auditor also assessed the city's P2 projects.

The auditor performed on October 16 & 17, 2012 an assessment of the Pretreatment Program implemented by the City of De Queen, Arkansas.

Participants included:

Rufus Torrence	ADEQ/Engineer & Auditor
Mike Sims	City of De Queen/Wastewater Superintendent

The goals of the audit/assessment were:

\* To determine the compliance status of the City of De Queen's new treatment plant with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403 and the Effluent Limitations in NPDES Permit No. AR0021733

\* To document the ADEQ Director's decision to discontinue the City of De Queen's NPDES permit requirement (AR0021733; Section 8.a on Page 2 of Part II) to operate an industrial pretreatment program

\*\*\*\*\*

Discussion: Since EPA Region VI delegated the NPDES Pretreatment Program to Arkansas on November 1, 1986, EPA Region VI approved the City of De Queen's Pretreatment Program on August 3, 1984 to control the sole SIU, Pilgrim Pride. Pilgrim was discharging over 50% of the loading (hydraulic and organic) to the POTW and the POTW was experiencing problems meeting the ammonia nitrogen (NH<sub>3</sub>-N) effluent limitations during the cold season.

In September 2009 the City upgraded the treatment plant in an effort to comply with the NPDES permit limits for nitrogen (NH<sub>3</sub>-N). The upgrade increased the plant design flow from 3.4 MGD to 4.0 MGD and the plant currently has the capacity to treat over 900 lbs/day of NH<sub>3</sub>-N (the maximum NH<sub>3</sub>-N loading over the past year was only 670 lbs/day, see attachment D-1/1). The upgrade consisted of a new bar screen, grit chamber, Vertical Loop Reactor-four aeration basins, two clarifiers and a Cannibal Reactor. The city converted an old filter to a chlorine contact chamber. The Cannibal Reactor was consuming 100% of the organic sludge. The City retrofitted the treatment process to include Luxury Uptake of Phosphorus which required storing about 376 dry tons per year of sludge in the old lagoon. Most of the phosphorus in the intake wastewater remains in the sludge wasted to the lagoon.

Pilgrim no longer has a reasonable potential for adversely affecting the POTW. Based on ICIS data (see Attachment F- 1/1), the new treatment plant has no problem meeting the NH<sub>3</sub>-N limits in the cold season. During the wet season, the plant did have some violations for NH<sub>3</sub>-N. However, these violations were due to improper O&M (see Attachment E-2/2). The plant was retrofitted with luxury phosphorus uptake to meet the final TP effluent limitation and the POTW has no problem meeting the 1.0/2.0 mg/l TP limits. In December 2010 the POTW effluent caused lethal and sub-lethal WET failures (see Attachment H-1/1) for the Pimephales Promelas (Fathead minnow). These failures were also caused by improper O&M (injecting too much Sodium Bisulfite for dechlorination). The WET retest passed (see Attachment G-4/4). The POTW is currently in compliance with the nitrogen and phosphorus limits in the NPDES permit. The treatment plant has performed as expected and the City expects to remain compliant with all effluent limitations in the future. Finally, the copper in the effluent has shown reasonable potential to violate the water quality standards of the receiving stream (unnamed tributary/Bear Creek) and the NPDES permit requires the City to monitor for copper. However, based on the 2011 annual report (see Attachment I-2/2), the copper concentration at the headworks was only 28.1/16.4 µg/l and well below the typical domestic levels of 740/140 µg/l (see Attachment J-2/2). The copper appears to be leaching from copper tubing in residential/commercial locations and at this time the City is not aware of any point sources of copper to control. Therefore, the Department will remove the NPDES permit requirement to operate an industrial pretreatment program. The POTW will be required to comply with only the General and Specific Prohibitions in 40 CFR 403.5.

The audit consisted of informal discussions with the City's Pretreatment personnel, examination of Pilgrim's file (only SIU), the pretreatment records at the treatment plant and, finally, a site visit to Pilgrim. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachments A through H.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit. Section C (normally contains recommendations) has been reserved. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

### ***B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS***

This section of the report provides confirmation that no chronic problems were found in the City of De Queen's POTW operations. The auditor has paraphrased with a CFR citation the Department's planned actions for the City's approved program. A narrative explanation of the finding will follow.

In accordance with **40 CFR 403.8(a)**, *"The Regional Administrator or Director may require that a POTW with a design flow of 5 mgd or less develop a POTW Pretreatment Program if he or she finds that the nature or volume of the industrial influent, treatment process upsets, violations of POTW effluent limitations, contamination of municipal sludge, or other circumstances warrant in order to prevent Interference with the POTW or Pass Through."*

Even though the City of De Queen's POTW design flow was only 3.4 MGD, the Regional Administrator required the City to develop a pretreatment program. Pilgrim Pride's (the only SIU) discharge was causing Interference (poor nitrification) and Pass Through (excessive NH<sub>3</sub>-N was entering the receiving stream) at the old WWTP. The City has upgraded the WWTP to enhance performance. Consequently, the Director finds that the current nature and volume of the industrial influent from Pilgrim Pride does not pose a threat at the new WWTP to cause treatment process upsets, violations of the POTW NPDES permit effluent limitations or contamination of the municipal sludge (no organic sludge is currently leaving the POTW). Furthermore, based on the plant upgrade in September 2009 and the good compliance history after the upgrade, the Director finds no other circumstances which may cause continued Interference with the POTW or Pass Through. Therefore, the Director has decided to remove the requirement from the NPDES permit to operate an industrial pretreatment program. The City of De Queen's POTW will be required to comply only with the General and Specific prohibitions found in **40 CFR 403.5**.

### ***C) RECOMMENDED POTW ACTIONS FOR IMPROVED IMPLEMENTATION OF THE PRETREATMENT AND POLLUTION PREVENTION PROGRAMS***

*[This section is reserved]*

**D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS**

In reference to Section 8.a on Page 2 of Part II of NPDES Permit #AR0021733, the City will not be required to update the Sewer Use Ordinance or Pretreatment Program to comply with the recent streamlining revisions to 40 CFR 403. Since the current effective permit is scheduled to expire on February 28, 2013 and the Department is presently drafting a renewal permit, the current effective permit will not be modified to remove the requirement to update and operate the pretreatment program.

The renewal permit will not have the requirement to (1) update the Sewer Use Ordinance and Pretreatment Program or (2) operate an industrial pretreatment program. The renewal permit will have the following pretreatment requirements:

A. The following pollutants may not be introduced into the treatment facility:

- (1) pollutants which create a fire or explosion hazard in the publicly owned treatment works (POTW), including, but not limited to, waste streams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;
- (2) pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0, unless the works are specifically designed to accommodate such discharges;
- (3) solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW, resulting in Interference<sup>1</sup> or Pass Through<sup>2</sup>;
- (4) any pollutant, including oxygen demanding pollutants (e.g., BOD), released in a discharge at a flow rate and/or pollutant concentration which will cause Pass Through or Interference with the POTW;
- (5) heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40 deg. C (104 deg. F) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits;
- (6) Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause Interference or Pass Through;
- (7) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- (8) Any trucked or hauled pollutants, except at discharge points designated by the POTW.

- B. The permittee shall require any indirect discharger to the treatment works to comply with the reporting requirements of Sections 204(b)<sup>3</sup>, 307<sup>4</sup>, and 308<sup>5</sup> of the Act, including any requirements established under 40 CFR Part 403.
- C. The permittee shall provide adequate notice to the Department of the following:
  - (1) any new introduction of pollutants into the treatment works from an indirect discharger which would be subject to Sections 301<sup>6</sup> or 306<sup>7</sup> of the Act if it were directly discharging those pollutants; and
  - (2) any substantial change in the volume or character of pollutants being introduced into the treatment works by a source introducing pollutants into the treatment works at the time of issuance of the permit.

Any notice shall include information on (i) the quality and quantity of effluent to be introduced into the treatment works, and (ii) any anticipated impact of the change on the quality or quantity of effluent to be discharged from the POTW.

\* \* \* \* \*

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*Footnotes:*

<sup>1</sup>According to 40 CFR Part 403.3(k) the term *Interference* means a Discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

(1) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and

(2) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

<sup>2</sup>According to 40 CFR 403.3(p) the term *Pass Through* means a Discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).

<sup>3</sup> Section 204(b) of the CWA requires the City to surcharge Pilgrim and any other SIU with significant organic loading to the POTW and to have proper revenue to operate and maintain the POTW.

<sup>4</sup>Section 307 requires the City to control toxic dischargers regulated by pretreatment standards; these users are referred to as Categorical Industrial Users and these users can have limits for toxic organics, heavy metals, cyanide, etc.

<sup>5</sup>Section 308 requires the City to have right of entry into industrial user facilities for inspections and monitoring.

<sup>6</sup>Section 301 requires the City to comply with all effluent limitation in the NPDES permit.

<sup>7</sup>Section 306 requires the City to control non-toxic indirect dischargers regulated by standards intended for direct dischargers (Categorical Industrial Users with limits for BOD<sub>5</sub>, TSS, NH<sub>3</sub>-N, etc.). The City may establish local limits for these users or demonstrate that local limits are not necessary.



# PRETREATMENT AUDIT CHECKLIST

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information.....Pages 1- 4  
 Section II: Pretreatment Program Analysis.....Pages 5-17  
 Section III: Industrial User File Evaluation .....Pages 18-25

### SECTION I: GENERAL INFORMATION

#### A. GENERAL INFORMATION

Control Authority Name: City of De Queen NPDES #: AR0021733  
 Mailing address: P.O. Box 730, De Queen, AR 71832  
 Permit Signatory: Mike Sims Title: Wastewater Superintendent  
 Telephone: 870.642.5231 FAX NUMBER: 870.642.5231 / 870.642.3111

Pretreatment Contact: Same Title: Same  
 Address: "  
 Telephone: "  
 E-Mail: msims@dequeen-ar.us

Pretreatment program approval date: 8/3/84

Dates of approval of any substantial modifications: N/A

Month Annual Pretreatment Report Due: August

Pretreatment Year Dates: 8/1 - 7/31 Date(s) of Audit: 10/16 - 10/17/12  
 (ASSESSMENT)

Inspector(s):

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
<u>Rufus Torrence</u>	<u>Engineer II</u>	<u>(501) 682-0626</u>

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>* Mike Sims</u>	<u>WW Superintendent</u>	<u>same</u>

\* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>Feb 16, 2011</u>	<u>No deficiencies noted</u>

YES NO

       ✓   Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

    If yes, describe the required corrective action:

       ✓   Is the Control Authority currently in SNC?

.....

The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with an asterisk or footnote that tells that there is more explanatory information and where it can be found.

## B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
<u>AR0021733</u>	<u>DeQueen WW Treatment Plant</u>	<u>03/01/08</u>	<u>02/28/13</u>

2. Individual Treatment Plant Information

a. Name of Treatment Plant: DeQueen WW Treatment Plant

Location Address: 670 South 9th Street

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 4.0 MGD; Actual (Average)- 2.0 MGD

Sewer System: 100 % Separate; 0 % Combined, # of CSOs 0

Industrial Contribution to this Treatment Plant

# of SIUs : 1 # of CIUs : 0  
Industrial Flow (mgd): 1.0 Industrial Flow (%) : 50 %

Level of Treatment

Type of Process(es):

Primary  Bar Screen-Grit chamber

Secondary  Vertical Loop Reactor-4 Aeration Basins, Luxury TP Uptake

Tertiary  Clarifiers-Sidestream sludge conditioning-Cannibal Reactor

Method of Disinfection: Chlorination

Dechlorination  YES  NO

Effluent Discharge

Receiving Stream Name: Big Bear Creek in Seg 1 of Red River

Receiving Stream Classification: Segment 1C of the Red River Basin

Receiving Stream Use: Fishable/Swimmable

If effluent is disposed of to any location other than the receiving stream, please note: No

Method of Sludge Disposal:

Quantity of Sludge:

<input type="checkbox"/> none generated	
<input type="checkbox"/> Land Application	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Monofill	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Public Distribution	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Lagoon Storage	<u>376</u> dry tons/yr.*
<input type="checkbox"/> Other (specify)	<input type="checkbox"/> dry tons/yr.

List of toxic pollutant limits in NPDES permit: None

\*The new plant has a cannibal reactor which can consume all of the biosolids but the Luxury Uptake requires the POTW to waste some of sludge to remove the phosphorus from the wastewater. Most of the Phosphorus entering the POTW is stored in the lagoon in the sludge.

a. (continuation of individual treatment plant information for De Queen Wastewater Treatment Plant.)

YES NO Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:  
            

Issuing Authority:    N/A    Issuance Date:    "     
Expiration Date:                                 

List pollutants that are specified in current sludge permit:  
   N/A   

YES NO N/A Has the Control Authority submitted results of whole effluent biological toxicity testing.  
        

         Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?)    Some failures occurred in 2010 on the fat head minnow tests.   

How many times were the following monitored during the past pretreatment year?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>   2   </u>	<u>   2   </u>	<u>   0   </u>	
Priority **	<u>   1   </u>	<u>   1   </u>	<u>   0   </u>	
Biomonitoring	<u>          </u>	<u>   4   </u>		
TCLP	<u>          </u>	<u>          </u>		
Other:	<u>          </u>	<u>          </u>		

\*As identified at 40 CFR 122, Appendix D, Table III, \*\*As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

   None established   

YES NO N/A Has the POTW begun tracking the trends in the above samples?  
        

        Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)  
Parameters Violated Cause(s)

   NH3-N       O&M-High NH3-N in EQ pond; feed rate too high   

YES NO  
   N/A\*    Has the treatment plant sludge violated the TCLP Test?

*\*Sludge is stored on-site in lagoon.*

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

- Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)] Program modification still under review by ADEQ pending discontinuing the pretreatment program.
- Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.  
CA demonstrated that local limits are not necessary and submitted a request to update legal authority to comply with recent Streamlining Rule.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

2. Modifications in Progress:

Date Requested	Nature of Modification
<u>July 7, 2009</u>	<u>Update Pretreatment Ordinance</u>

YES NO

- Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:
- Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

D. Legal Authority [403.8(f)(1)]

Date of original Pretreatment Program approval: 8/3/84 [WENDB-PTIM]  
 Date of most recent Ordinance approved by the Control authority: 5/3/83  
 Date of most recent Pretreatment Program modification approval: Pending  
 Does the Control Authority's legal authority enable it to:  
 [403.8(f)(1)(i-vii)]

YES NO

- Deny or condition pollutant discharges
- Require compliance with standards
- Control discharges through permit or similar means
- Require compliance schedules and IU reports
- Carry out inspection and monitoring activities
- Obtain remedies for noncompliance
- Comply with confidentiality requirements
- Establish Pollution Prevention
- Has the city developed and adopted a Pollution Prevention policy?

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

- No oversight authority
- No inspection authority
- No remedies for noncompliance
- No "equivalent" standard
- No clear delineation of responsibility for program implementation
- Interjurisdictional agreements not entered into
- Other, Specify

Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no:

N/A Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

N/A Have provisions been made for the incorporation of Pollution Prevention (P2) policies by contributing jurisdictions?

List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1. <u>N/A</u>			
2.			

If relying on activities of contributing jurisdictions, indicate which activities are performed by jurisdictions and describe any problems in their implementation. N/A

### Problems

- Updating industrial waste survey
- Notification of IUs
- Permit issuance
- Receipt and review of IU reports
- Inspection and sampling of IUs
- Assessment of IUs for P2 activity
- Analysis of samples
- Enforcement
- Other:

Briefly describe other problems:

—

Identify any IUs that have caused problems of interference, upset, pass through, sludge contamination, problems in the collection system, or worker health and safety in the past 12 months:

IU Name	Problem	NPDES Permit Violation	
		Yes	No
<u>None</u>			

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### E. Industrial User Characterization [403.8(f)(2)(i)]

YES NO Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]  
     

      If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P2 activity?

     \* Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

*\* size of community does not dictate formal procedures*

      If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P2 activity and the distribution of P2 reference materials to the IUs which qualify?

What methods are used to update the IWS:

- Review of newspaper/phone book
- Review of plumbing/building permits
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify)

How often is the survey to be updated? ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: none apparent

YES NO

      Have any new SIUs been identified within the last 12 months? If yes:

<u>Name of IU</u>	<u>Type of Industry</u>	<u>Is the IU Permitted?</u>
-------------------	-------------------------	-----------------------------

N/A

How many IUs are currently identified by the Control Authority in each of the following groups:

- |    |           |   |
|----|-----------|---|
| a. | <u>1*</u> | SIUs (As defined by the Control Authority) [WENDB-SIUS]             |
| b. | <u>0</u>  | Categorical Industrial Users (CIUs) [WENDB-CIUS]                    |
| c. | <u>1</u>  | Noncategorical SIUs [Pilgrims]                                      |
| d. | <u>1</u>  | Other regulated nonsignificant IUs (Describe) <u>septage hauler</u> |
|    | <u>2</u>  | TOTAL of a. + d.  |

**\*The CA 1982 IWS identifies 14 possible SIUs but only one (Pilgrim) was actually categorized as an SIU. Pilgrim remains the sole SIU to this date. Since Pilgrim no longer poses a threat to the new POTW, Pilgrim may be deemed a non-significant SIU.**

     Has the POTW identified any IUs with Pollution Prevention opportunities?

     Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1)(i-ii)]

If not, the Control Authority has defined "significant industrial user" to mean:

CA was adopting the Jan 2007 EPA Model Pretreatment Ordinance

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### F. Control Mechanism Evaluation [403.8(f)(1)(iii)]

YES    NO  
   

Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

Describe the Control Authority's approved control mechanism (e.g., permit, etc.): Permit

What is the maximum term of the control mechanism? 5 years

0

How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

	PERMIT EXPIRATION	DATE
IU NAME		
<u>N/A</u>		

YES    NO  
      
      
   

Does the Control Authority accept trucked septage wastes?

Does the Control Authority accept other trucked wastes?

Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

YES    NO  
     Does Control Mechanism designate a discharge point? [403.5(b)(8)]  
     Are all applicable categorical standards and local limits applied to trucked wastes?

\* General Prohibitions

List all pollutants and applicable limits, other than local limits and categorical standards, that are applied to waste haulers:

Pollutant	Limit
<u>N/A</u>	

Describe the discharge point(s) (including security procedures):

At the POTW under supervision

    Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?

N/A Does the Control Authority have a control mechanism for regulating wastes from UST sites?

List all pollutants and applicable limits, other than local limits and categorical standards, that are applied to UST cleanup sites:

Pollutant	Limit
<u>N/A</u>	



## SECTION II: PROGRAM ANALYSIS AND PROFILE

### G. Application of Pretreatment Standards and Requirements

YES  NO

Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

2-17-09 Date Notified Letter Method of Notification

How does the Control Authority keep abreast of current regulations to ensure proper implementation of standards?

<input type="checkbox"/> Federal Register	<input checked="" type="checkbox"/> Journals, Newsletters
<input checked="" type="checkbox"/> Meetings, Training	<input checked="" type="checkbox"/> Other <u>Internet</u>
<input checked="" type="checkbox"/> Government Agencies	<input type="checkbox"/> Other

YES  NO

Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit, or Annual Report?

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
-------------------	-----------	-----------	-------------------

Submitted modification demonstrating that local limits are not necessary.

YES  NO

\*   Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]

	Headworks Analysis Completed? *		Local Limits Needed?		Local Limits Adopted? (Ord.)		Old Ordinance Numerical Limit Adopted (mg/l)
	Yes*	No	Yes	No	Yes	No	
Arsenic (As)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Cadmium (Cd)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.5
Chromium-Total	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.5
Copper (Cu)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.8
Cyanide (CN)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.23
Lead (Pb)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.3
Mercury (Hg)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Molybdenum (Mo)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Nickel (Ni)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.8
Selenium (Se)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Silver (Ag)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Zinc (Zn)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.8

\* The CA has monitored Table III pollutants at the headworks & most of the pollutants listed above have not been detected; therefore, the CA requested that local limits be deemed unnecessary.

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES  NO

Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

POLLUTANT	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numeric Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
<u>None</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

YES  NO

N/A Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

What method of allocation was used for local limits for each pollutant that has a local limit in-place? N/A

	TYPE OF ALLOCATION		
	<u>Uniform Concentration</u>	<u>Mass</u>	<u>Hybrid</u>
Arsenic (As)	<u>      </u>	<u>      </u>	<u>      </u>
Cadmium (Cd)	<u>      </u>	<u>      </u>	<u>      </u>
Chromium-Total	<u>      </u>	<u>      </u>	<u>      </u>
Copper (Cu)	<u>      </u>	<u>      </u>	<u>      </u>
Cyanide (CN)	<u>      </u>	<u>      </u>	<u>      </u>
Lead (Pb)	<u>      </u>	<u>      </u>	<u>      </u>
Mercury (Hg)	<u>      </u>	<u>      </u>	<u>      </u>
Molybdenum (Mo)	<u>      </u>	<u>      </u>	<u>      </u>
Nickel (Ni)	<u>      </u>	<u>      </u>	<u>      </u>
Selenium (Se)	<u>      </u>	<u>      </u>	<u>      </u>
Silver (Ag)	<u>      </u>	<u>      </u>	<u>      </u>
Zinc (Zn)	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants?  
N/A

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
<b>Inspections:</b>			
CIUs	<u>N/A</u>	1/year	
Other SIUs	<u>1</u>	1/year	
<b>Sampling:</b>			
CIUs	<u>N/A</u>	1/year	
Other SIUs	<u>12</u>	1/year	<u>Surcharge</u>
<b>Reporting:</b>			
CIUs	<u>N/A</u>	2/year	
Other SIUs	<u>N/A</u>	2/year	<u>City does monitoring</u>
<b>Self-Monitoring:</b>			
CIUs	<u>N/A</u>	2/year	
Other SIUs	<u>N/A</u>	2/year	<u>City does monitoring</u>

<u>#</u>	<u>%</u>	<u>How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)</u>
<u>0</u>	<u>0</u>	Not sampled at least once in the past reporting year?
<u>0</u>	<u>0</u>	Not inspected at least once in the past Pretreatment reporting year?
<u>0</u>	<u>0</u>	Not inspected and not sampled at least once in the past reporting year ? [WENDB-NOIN]-[403.8(f)(2)(v)]

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected.

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	If requested?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	To verify city self-monitoring results?

Provide the following information regarding pollutant analyses done by the POTW:

	<u>Analytical Method *</u>	<u>Name of Laboratory</u>
Metals	<u>ICAP</u>	<u>Ark Analytical</u>
Cyanide	<u>spectrophotometric</u>	<u>Ark Analytical</u>
Organics	<u>GasChromo/MassSpec</u>	<u>Ark Analytical</u>
Other		

Were all wastewater samples analyzed by 40 CFR 136 methods? **Yes**

\* Enter the type of Analytical Method used for each group of pollutants. (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, etc.)

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe POTW uses a state certified lab has QA/QC procedures.

How much time normally elapses between sample collection and obtaining analytical results for:

5 days Conventionals  
2 wks Metals  
2 wks Organics

Is there an established protocol clearly detailing sampling location and procedures? **The CA samples Pilgrim's wastewater on-site in a surge pit just after a V-Notch weir-flume then the wastewater flows into a dedicated pipeline to the POTW headworks.**

Has the Control Authority had any problems performing compliance monitoring?  
If yes, explain:

Does the Control Authority use the following methods for compliance monitoring?

YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Scheduled compliance monitoring
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Unscheduled compliance monitoring
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Demand monitoring for IU compliance
<input type="checkbox"/>	<input checked="" type="checkbox"/>	IU self-monitoring
<input type="checkbox"/>	<input type="checkbox"/>	Other:

YES NO

N/A  Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below:  
None

### I. ENFORCEMENT

YES NO

Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)]

Does the Control Authority have a written enforcement response plan? [403.8(f)(5)]. If yes, does the draft plan:

Describe how the Control Authority will investigate instances of noncompliance

Describe the Control Authority's types of escalating enforcement responses and the periods for each response

Identify by Title the Official(s) responsible for implementing each type of enforcement response

Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

## SECTION II: PROGRAM ANALYSIS AND PROFILE

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Notice or letter of violation  | <input checked="" type="checkbox"/> Administrative Order    |
| <input checked="" type="checkbox"/> Setting of compliance schedule | <input checked="" type="checkbox"/> Revocation of permit    |
| <input checked="" type="checkbox"/> Injunctive relief              | <input checked="" type="checkbox"/> Fines (maximum amount): |
|  | \$ <u>1000*</u> /day/violation                              |
|  | \$ _____ /day/violation                                     |
|  | \$ _____ /day/violation                                     |
| <input type="checkbox"/> Imprisonment                              |   |
| <input checked="" type="checkbox"/> Termination of Service         |   |
| <input type="checkbox"/> Other:                                    |   |

\*Approved program has only \$500/day/violation; mod proposes increasing to \$1000

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: None at this time.

YES NO

- When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
- Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].  
Comment: *The CA is adopting EPA Jan 2007 Model Pretreatment Ordinance*
- If no, does the Control Authority conduct all of the monitoring?
- Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Date	Return to Compliance? Yes (Date)	No
N/A	N/A	N/A		N/A	

Indicate the number and percent of SIUs that were identified as being in significant noncompliance during the past Pretreatment reporting period:

#	%	
0		Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0		Self-monitoring requirements [WENDB-MSNC]
0		Reporting requirements [WENDB-PSNC]
0		Pretreatment compliance schedule [WENDB-SSNC]
0		How many SIUs that are currently in SNC with self-monitoring and were

## SECTION II: PROGRAM ANALYSIS AND PROFILE

not inspected or sampled? [WENDB-SNIN]

YES    NO

         Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples.

Has the Control Authority experienced any of the following:

YES    NO

EXPLAIN and ID Industrial User

        \* Interference [NPDES-ICIS]. \*Pilgrim is not a toxic discharger and has never caused interference (inhibition or disruption) at the POTW.

         Pass through [NPDES-ICIS].

         Fire or explosions?  
(incl. flash point viol.)

         Corrosive structural damage?  
(incl. pH <5.0).

         Flow obstructions?

         Excessive flow  
or pollutant  
concentrations?

         Heat problems?

         Interference due to oil  
or grease?

         Toxic fumes?

         Illicit dumping of  
hauled wastes?

     Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]

    0    How many SIUs are currently on compliance schedules?

    N/A    Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

Indicate the number of SIUs from which penalties have been collected by the Control Authority during the past Pretreatment reporting period:

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	\$
Administrative	<u>0</u>	\$
Total	<u>0</u>	\$
		[NPDES-ICIS]

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO  
✓     Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES NO  
✓     computerized  
✓     hard copy  
        OTHER:

Are the following files computerized:

YES NO  
    \* Control Mechanism Issuance  
    \* Inspection and Sampling schedule

***\*Not necessary since the CA has only one SIU***

✓     Monitoring Data  
✓     IU Compliance Status Tracking  
        Other:

Can IU monitoring data can be retrieved by:

✓     Industry name  
    ✓ Pollutant type  
    ✓ Industrial category or type  
    ✓ SIC Code  
    ✓ IU discharge volume  
    ✓ Geographic location  
    ✓ Receiving treatment plant (i.e.if > one plant in the system)  
        Other (specify)  
✓     Does the POTW have provisions to address claims of confidentiality?  
          [403.8(f)(1)(vii)]

    ✓ Have IUs requested that data be held confidential?  
How is confidential information handled by the Control Authority?

    ✓ Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain

✓     Are all records maintained for at least 3 years?

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] \* - FTE = Full Time Equivalent Employee

approximately 1/4 ; Mike Sims main duties are WWTP superintendent.

YES  NO

Have any problems in program implementation been observed which appear to be related to inadequate funding?

If yes, describe and show below the source(s) of funding for the program:

Percent of Total Funding

<input checked="" type="checkbox"/>	POTW general operating fund	<u>100</u>
<input type="checkbox"/>	IU permit fees	
<input type="checkbox"/>	monitoring charges	
<input type="checkbox"/>	industry surcharges	
<input type="checkbox"/>	other (describe)	
	Total	<b>100%</b>

Is funding expected to continue near the current level? If no, will it: Increase  or Decrease   
If no, describe the nature of the changes:

Are an adequate number of personnel available for the following program areas:

YES	NO		<u>If no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Legal assistance	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Permitting	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	IU inspections	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample collection	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample analyses	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data analysis, review and response	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enforcement	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Administration (inc. record keeping /data management)	

Does the Control Authority have access to adequate:

YES	NO		<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	"
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	<u>Pick-up</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	



## **SECTION II: PROGRAM ANALYSIS AND PROFILE**

### **L. POLLUTION PREVENTION**

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):  
None
  
2. Has the source of any toxic pollutants been identified?  
If yes, what was found?  
  
No; Table II & III analyses shows ND for most pollutants.
  
3. Has the POTW implemented any kind of public education program? If yes, describe:  
  
Plant tours
  
4. Does the POTW have any pollution prevention success stories for industrial users documented? No. If yes, please attach.
  
5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?  
No
  
6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? **No**  
  
If yes, which of the "Guides to Pollution Prevention" were used?

### SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Pilgram's Pride File/ID No. 032  
Industry Address 401 S. 3<sup>rd</sup> 71833  
Industry Description Poultry Processing  
Industrial Category N/A 40 CFR N/A SIC Code: 2015  
Ave. Total Flow (mgd) 1 - 1.5 Ave. Process Flow (mgd) 1.3

Industry visited during audit: YES

Comments: IU constitutes approx 60% of total POTW flow

FILE #: \_\_\_\_\_ Industry Name \_\_\_\_\_ File/ID No. \_\_\_\_\_  
Industry Address \_\_\_\_\_  
Industry Description \_\_\_\_\_  
Industrial Category \_\_\_\_\_ 40 CFR \_\_\_\_\_ SIC Code: \_\_\_\_\_  
Ave. Total Flow \_\_\_\_\_ Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit:

Comments:

FILE #: \_\_\_\_\_ Industry Name \_\_\_\_\_ File/ID No. \_\_\_\_\_  
Industry Address \_\_\_\_\_  
Industry Description \_\_\_\_\_  
Industrial Category \_\_\_\_\_ 40 CFR \_\_\_\_\_ SIC Code: \_\_\_\_\_  
Ave. Total Flow (gpd) \_\_\_\_\_ Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit:

Comments:

## SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
	✓ => Yes      N/A => Not Applicable				
g. Sampling locations?	<u>✓</u>				
h. Requirement for flow monitoring?	<u>✓</u>				
i. Types of samples (grab or composite) for self-monitoring?	<u>✓</u>				
j. Applicable IU reporting requirements?	<u>✓</u>				
k. Standard conditions for:					
Right of Entry?	<u>✓</u>				
Records retention? Civil and Criminal	<u>✓</u>				
Penalty provisions?	<u>✓</u>				
Revocation of permit?	<u>✓</u>				
l. Compliance schedules/ progress reports	<u>✓</u>				
m. General/Specific Prohibitions?	<u>no</u>				
n. Where technologically and economically achievable, are P2 aspect included?	<u>no</u>				
<b>C. <u>Application of Standards</u></b>					
1. Has the IU been properly categorized?	<u>✓</u>				
2. Were both Categorical Standards and Local Limits properly applied?	<u>N/A</u>				
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>✓</u>				
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>N/A</u>				

Comments:

## SECTION III: INDUSTRIAL USER FILE REVIEW

FILE 1    FILE 2    FILE 3    FILE 4    FILE 5

✓ => Yes    N/A => Not Applicable

5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]    N/A

6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?    N/A

7. Is the Control Authority applying a bypass provision to this IU?    no

### D. Compliance Monitoring

#### Sampling

1. Does the file contain Control Authority sampling results for the industry?    ✓

2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]    ✓

3. Does the sampling report(s) include: [403.8(f)(2)(vi)]

- a. Name of sampling personnel?    ✓
- b. Sample date and time?    ✓
- c. Sample type?    ✓
- d. Wastewater flow at the time of sampling?    ✓
- e. Sample preservation procedures?    ✓
- f. Chain-of-custody records?    ✓
- g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]    ✓

4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?    N/A

# SECTION III: INDUSTRIAL USER FILE REVIEW

FILE 1   FILE 2   FILE 3   FILE 4   FILE 5

✓ => Yes      N/A => Not Applicable

5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?      ✓

6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]      ✓

Inspections

7. Does the IU file contain inspection reports?      ✓

8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]      ✓

b. Date of last Inspection      08-01-12

9. Does the inspection report(s) include: [403.8(f)(2)(vi)]

a. Inspector Name(s)      ✓

b. Inspection date and time?      ✓

c. Name and title of IU official contacted?      ✓

d. Verification of production rates?      N/A

e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?      ✓

f. Evaluation of pretreatment facilities?      ✓

g. Evaluation of self-monitoring equipment and techniques?      N/A

h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]      no

Comments:

## SECTION III: INDUSTRIAL USER FILE REVIEW

FILE 1    FILE 2    FILE 3    FILE 4    FILE 5

✓ => Yes      N/A => Not Applicable

- i. Manufacturing facilities?                    N/A
- j. Chemical handling and storage procedures?       ✓
- k. Chemical spill prevention areas?               ✓
- l. Hazardous waste storage areas and handling procedures?       N/A
- m. Sampling procedures?                    N/A
- n. Laboratory procedures?                  N/A
- o. Monitoring records?                    N/A
- p. Evaluation of Pollution Prevention opportunities?       no
- q. Control Authority inspector signature?               ✓

### IU Self-Monitoring and Reporting

- 10. Does the file contain self-monitoring reports?       ✓<sup>5</sup>
- 11. Does the file include:
  - a. BMR?                                       N/A
  - b. 90-Day Report?                         N/A
  - c. All periodic reports?                   N/A
  - d. Compliance schedule reports?       N/A
- 12. Did the IU report on all required parameters?       N/A
- 13. Did the IU comply with the required sampling frequency(s)?       N/A
- 14. Did the IU report flow?                         N/A
- 15. Did the IU comply with the required reporting frequency(s)?       N/A

Comments: 5. City does all monitoring

## SECTION III: INDUSTRIAL USER FILE REVIEW

FILE 1    FILE 2    FILE 3    FILE 4    FILE 5

✓ => Yes      N/A => Not Applicable

16. For all SIUs, are self-monitoring reports signed and certified?      N/A

17. Did the IU report all changes in its discharge? [403.12(j)]      ✓

18. Has the IU developed a Slug Control and Prevention Plan?      no

19. Has the industry been responsible for spills or slug loads discharged to the POTW?      no

If yes, does the file contain documentation regarding:

a. Did the spill cause Pass Through or Interference?      N/A

b. Did POTW respond to the spill?      N/A

### E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]

a. Control Authority monitoring results?      ✓

b. IU self-monitoring results?      N/A

c. If NS CIU was it compliant within 90 days from commencement of discharge?      N/A

2. How many reports submitted during the past reporting year indicated discharge violations?      8<sup>1</sup>

3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?      N/A

Comments: 1. See 2011 Annual Report PPS Attachment C

## SECTION III: INDUSTRIAL USER FILE REVIEW

Enforcement (continued)

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
	✓ => Yes      N/A => Not Applicable				
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>N/A</u>				
5. Were all nondischarge violations identified in the file?	<u>N/A</u>				
6. Was the IU notified of all violations?	<u>✓</u>				
7. Was follow-up enforcement action taken by the Control Authority?	<u>✓</u>				
8. Did the Control Authority follow its approved ERP?	<u>✓</u>				
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>✓</u>				
10. Is there a compliance schedule? If yes:	<u>N/A</u>				
11. Were there any compliance schedule violations?	<u>N/A</u>				
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>✓</u>				
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>✓</u>				
b. TRC	<u>✓</u>				
c. Pass through/Interference	<u>✓</u>				
d. Spill/slug loads	<u>✓</u>				
e. Reporting	<u>✓</u>				
f. Compliance schedule	<u>✓</u>				
g. others (specify)					
13. Was the SIU published for SNC?	<u>N/A</u>				
Date of publication.	<u>N/A</u>				



**REPORTABLE NONCOMPLIANCE (RNC)**  
**for the Pretreatment Audit Checklist**  
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of De Queen NPDES #: AR0021733

Date of Audit: 10/16-17/12 Date entered into QNCR: 10-22-2012

(ASSESSMENT)

		Level
<u>NO</u>	Failure to enforce against pass through and/or interference	I
<u>NO</u>	Failure to submit required reports within 30 days	I
<u>NO</u>	Failure to meet compliance schedule milestone date within 90 days	I
<u>NO</u>	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
<u>NO</u>	Failure to inspect or sample 80% of SIUs within the last reporting year	II
<u>NO</u>	Failure to enforce pretreatment standards and reporting requirements	II
<u>NO</u>	Other violations of concern	II

SIGNIFICANT NONCOMPLIANCE (SNC)

NO Is the Control Authority in SNC for violation of any Level I criterion.

NO Is the Control Authority in SNC for violation of 2 or more **Level II criterion**.

**Compliance Monitoring Information**

Compliance Activity Type: Inspection/Evaluation      \* Compliance Monitoring Type: **AFO Defined**  
 \* State: AR      AFO Designation  
 Compliance Monitoring Activity Name: **City of D-Queen AR0021733**      Aerial Photography  
 If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method:       Audit (IU)

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Compliance Monitoring Dates**

Planned Start Date: **10-16-2012**      Actual Start Date: **10-16-2012**  
 Planned End Date: **10-17-2012**      Actual End Date: **10-17-2012**

**Statutes and Sections Information**

Federal Statutes: CWA - Clean Water Act

\* Programs:

- NPDES - Post Administrative Penalty Case (Settlement)
- NPDES - Pretreatment**
- NPDES - Sanitary Sewer Overflow (SSO)
- NPDES - Section 308 Information Requests
- NPDES - Sludge/Biosolids

State Statute:

\* Compliance Monitoring Action Reason:

- Agency Priority
- Citizen Complaint/Tip
- Core Program**
- For Cause
- Random Inspection

\* Compliance Monitoring Agency Type:

- State Contractor
- State - Using Federal Credential
- State**
- Regional
- Other Federal

Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist?: **No**

Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? **State**

If Joint, what was the purpose of the participation of the other party?

Which party had the lead?

**Government Contacts**

Affiliation Type	First Name	Last Name	Phone	Office	Organization
SIC Codes:	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <b>4952 Sewerage Systems</b> </div> <input type="button" value="ADD / REMOVE"/>				
NAICS Codes:					
		<b>Priorities</b>			
		OECA National Priority: <ul style="list-style-type: none"> <li>2009 - (CA Only) - Air Toxics - Flares</li> <li>2009 - (CA Only) - Air Toxics - LDAR</li> <li>2009 - (CA Only) - Air Toxics - Surface Coating</li> <li>2009 - (CA Only) - Financial Assurance</li> <li>2009 - (CA Only) - MP - Mining</li> </ul>			
		Regional Priority: <ul style="list-style-type: none"> <li>2009 - Region 06 - Air Toxics Major Sources (O &amp; G)</li> <li>2009 - Region 06 - Brine Spills from Oil &amp; Gas Operations</li> <li>2009 - Region 06 - CD Implementation</li> <li>2009 - Region 06 - Minor Wastewater Collection &amp; Treatment System</li> <li>2009 - Region 06 - Petroleum Refining</li> </ul>			

**Media Monitored**

Media Monitored:

**Compliance Monitoring Information**

Number of Days Physically Conducting Activity: **2**  
 Number of Hours Physically Conducting Activity:   
 Compliance Monitoring Action Outcome: **No Violations**  
 Compliance Monitoring Rating Code: **Satisfactory**

**Compliance Monitoring Comments**

Compliance Monitoring Comments: **001: Significant Industry Site Visit Conducted**



Special Programs

Pretreatment

Significant Industrial Users (SIUs)

SIUs:

SIUs Without Control Mechanism:

SIUs Not Inspected:

SIUs Not Sampled:

SIUs in SNC with Pretreatment Standards:

SIUs in SNC with Reporting Requirements:

SIUs in SNC with Pretreatment Schedule:

SIUs in SNC Published in Newspaper:

SIUs on Schedules:

Violation Notices Issued to SIUs:

Administrative Orders Issued to SIUs:

Civil Suits Filed Against SIUs:

Criminal Suits Filed Against SIUs:

Local Limits

Date of Most Recent Technical Evaluation for Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

Removal Credits

Removal Credits Application Status:

Date of Most Recent Removal Credits Approval:

Removal Credits:

Acceptance of Waste

Acceptance of Hazardous Waste:

Acceptance of Non-Hazardous Industrial Waste:

Acceptance of Hauled Domestic Wastes:

Deficiencies

Deficiencies Identified During IU File Review:

Control Mechanism Deficiencies:

Legal Authority Deficiencies:

Deficiencies in Data Management and Public Participation:

Deficiencies in Interpretation and Application of Pretreatment Standards:

Inadequacy of Sampling and Inspections:

Adequacy of Pretreatment Resources:

Categorical Industrial Users (CIUs)

CIUs:

CIUs in SNC:

Penalties

Dollar Amount of Penalties Collected: \$

Industrial Users (IUs) from which Penalties have been collected:

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Violation of IU Schedule for Remedial Measures:

Formal Response to Violation of IU Schedule for Remedial Measures:

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling:

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of De Queen NPDES #: AR0021733

Name, address and phone number of industry:  
Pilgram's Pride, 4015 S 3<sup>rd</sup>, 870.584.5000

Type of industry: Poultry Processor/kill plant Date/Time of visit: 10-16-12 @ 1:30 p.m.

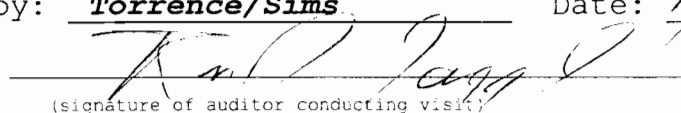
Industry contacts: Eddie Halter, Plant Mgr; Danny Willis, Safety Mgr; Danny Cranford, Maint Supv/Pretreatment Operator

	Yes	No	N/A
1. Significant industrial user?	<u>✓</u>		
2. Classified correctly?	<u>✓</u>		
3. Pretreatment equipment or procedures?	<u>✓</u>		
4. Pretreatment equipment maintained and operational?	<u>✓</u>		
5. Hazardous waste generated or stored?	_____	_____	<u>✓</u>
6. Proper solid waste disposal?	<u>✓</u>		
7. Solvent management/TTO control?	_____	_____	<u>✓</u>
8. Suitable sampling location?	<u>✓</u>		
9. Appropriate self-monitoring procedures/equipment?	_____	_____	<u>✓</u>
10. Adequate spill prevention and control?	<u>✓</u>		
11. Industrial familiar with limits and requirements?	<u>✓</u>		
12. Pollution Prevention activity	<u>*</u>		

Additional comments:

*This single IU contributes approximately 60% of the average daily flow to the POTW. The plant must comply with USDA requirements for wash waters including the truck wash waters; therefore, the facility has minimal control over "wastewater minimization" and must continue contributing about three quarters of the hydraulic load to the POTW. Nonetheless, the facility is attempting some wastewater minimization. All wastewater (pH 6) flows by gravity to the pretreatment pit and then is pumped to pretreatment equipment.*

Visit conducted by: Torrence/Sims Date: 10-23-12

  
 \_\_\_\_\_  
 (signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of De Queen NPDES #: AR0021733

Industry name: Pilgram's Pride

Additional comments:

*The pretreatment equipment consists of two standard (55,000 gallon) DAF units in parallel. Wastewater flows into a floc tank where ferric sulfide is added. Wastewater then is split and flows into either of the DAF units where anionic polymers are added.*


*Oil & grease skimmings (about 60,000 lbs/day) from the DAF units are sent to three 8,000 gallon sludge holding tanks. This sludge is hauled off for either cat food or chicken feed.*

*Caustic is added for neutralization before discharge to the POTW.*

*Licensed operators are on duty 24 hr/day.*

*The ADEQ and City Inspectors were not allowed to enter the food preparation area due to a recently implemented bio-contamination protocol which prohibits visitors from WWTPs from entering for at least 24 hours.*

Visit conducted by: Torrence/Sims Date: 10-25-12

  
(signature of auditor conducting visit)

BILLY RAY McKELVY  
MAYOR



DONNA J. JONES  
CITY CLERK/TREASURER

**CITY OF DE QUEEN**  
(870) 584-3445

**APPLICATION FOR INDUSTRIAL WASTEWATER DISCHARGE PERMIT**

( Please complete this form and return with \$50.00 application fee )

To: City of De Queen, Sewer Supt.

P.O. Box 730

De Queen Ar. 71832

NAME OF FIRM: PILGRIM'S PRIDE SIC NO 2015

LOCATION: 401 So. 3rd STREET, DEQUEEN, AR PHONE NO: 870-584-5212

MAILING ADDRESS: P.O. Box 389, DEQUEEN, AR 71832

TYPE OF BUSINESS / INDUSTRY: POULTRY PROCESSOR  
(restaurant, laundry, garage etc...)

WASTE PROCESS (S): PRODUCED PRIMARILY THROUGH RECEIVING + CUT-UP OPERATIONS  
OF POULTRY AS WELL AS CLEAN-UP OPERATIONS. PRODUCES: BOD, TSS, AND O<sub>2</sub>G.  
(equipment, floor washing, cooling, metal finishing, parts cleaning, etc...)

MAJOR CHEMICALS USED: FERRIC SULFATE, ANIONIC + CATIONIC POLYMERS, CAUSTIC SODA,  
SODIUM + CALCIUM HYPOCHLORITE CONTAINING SOAPS + DETERGENTS, + ACID-BASED ANTI-MICROBIALS.  
(soaps, detergents, caustics, solvents, acids, etc...)

AMOUNT OF WASTEWATER DISCHARGED (GALLONS): MEASURED: 1.15 MGD DURING NORMAL OP (5-6 DAYS/WRK)  
( measured / estimated --- per day / per month )

NAME, ADDRESS AND PHONE OF PERSON OR FIRM RESPONSIBLE FOR WORK COVERED BY THIS PERMIT: EDDIE HALTER, PLANT MANAGER

P.O. Box 389, DEQUEEN, AR 71832 PHONE: 870-584-5217

SIGNED: Eddie Halter

TITLE: PLANT MANAGER

CHECK OR MONEY ORDER NO: \_\_\_\_\_ DATE: 8-15-12

*Check has been requested.  
Dianna Barger 8/16/12*

**CITY OF DE QUEEN  
WASTEWATER DISCHARGE PERMIT**

**COMPANY NAME : PILGRIM'S PRIDE CORP.**

**DIVISION NAME ( if applicable ): DE QUEEN COMPLEX**

**MAILING ADDRESS : P O BOX 389 DE QUEEN AR 71832**

**FACILITY ADDRESS : 401 S. 3RD DE QUEEN AR. 71832**

**SIC NO : 2015**

The above Industrial User is authorized to discharge industrial wastewater to the City of De Queen's sewer system in compliance with City Ordinance Numbers ( 618,622,634 & 647 ) and any applicable provisions of Federal or State law or regulations. This in accordance with discharge point(s), effluent limitations, monitoring requirements and other conditions set forth herein.

This permit is granted in accordance with the application filed on ( 8/15/12) in the office of the Wastewater Superintendent, and in conformity with plans, specifications and other data submitted to the City in support of the submitted application.

**EFFECTIVE DATE : SEPTEMBER 1, 2012**

**EXPIRATION DATE : AUGUST 31,2013**

**WASTEWATER SUPT : MICHAEL SIMS**

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**PART 1 - WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS ...**

The Industrial User shall comply with the Effluent Limitations specified below by ( September 1,2012 ).  
Samples will be collected at the Pretreatment Final Flume at IU Pretreatment Facility.

<b>PARAMETER TYPE</b>	<b>30DAY AVE.</b>	<b>DAILY MAX.</b>	<b>SAMPLE FREQ.</b>	<b>SAMPLE</b>
<b>BOD 24hr composite</b>	<b>550 mg/l</b>	<b>650 mg/l</b>		<b>7day/month</b>
<b>TSS 24hr composite</b>	<b>300 mg/l</b>	<b>400 mg/l</b>		<b>7day/month</b>
<b>O &amp; G grab</b>	<b>100 mg/l</b>	<b>150 mg/l</b>		<b>7day/month</b>
<b>FLOW 24hr totalizer</b>	<b>2.00 mgd</b>	<b>2.5 mgd</b>		<b>7day/month</b>
<b>PH grab</b>	<b>6 to 9 su</b>			<b>7day/month</b>
<b>TKN/NH3/TP 24hr composite</b>	<b>report only</b>			<b>7day/month</b>

BOD = Biochemical Oxygen Demand  
TSS = Total Suspended Solids  
O&G = Oil & Grease  
TKN = Total Kjeldahl Nitrogen  
NH3 = Ammonia Nitrogen  
TP= Total Phosphorus

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## PART II - SPECIAL CONDITIONS / COMPLIANCE SCHEDULES

All samples will be collected by the City of De Queen wastewater dept. personal and the analysis will be conducted by a lab of the City's choosing. All fees for lab work will be paid by the industry.

- 1) Composite samples will be time composite
- 2) Daily & Monthly flow results are from Pretreatment effluent flow wastewater meter
- 3) 50,000 gallons added to daily flow when DAF units are drained

### PART III - REPORTING REQUIREMENTS

- 1 . The Industrial User shall notify the City immediately upon any accidental or slug discharge to the sanitary sewer as outlined in the Accidental Spill section of the City's Ordinance Number 647 . Formal written notification discussing circumstances and remedies shall be submitted to the City within 5 ( five ) days of the occurrence .
- 2 . The Industrial User shall notify the City prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the wastewater being introduced into the POTW from the User's industrial processes . Formal written notification shall follow within 30 ( thirty ) days of such introduction .
- 3 . The Industrial User shall report completion of its sampling / monitoring manhole .
- 4 . All reports shall be submitted to the following address :

Wastewater Supt .  
City of De Queen  
P . O . Box 730  
De Queen AR . 71832

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#### PART IV - STANDARD CONDITIONS

1 . The Industrial User shall comply with all the general prohibitive discharge standards in Section 2-1 of City Ordinance No . 647 .

#### 2 . RIGHT OF ENTRY

The Industrial User shall, after reasonable notification by the City, allow the City or it's representatives, exhibiting proper credentials and identification, to enter upon the premises of the User, at all reasonable hours, for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling includes any time the Industrial User is operating any process which results in a process wastewater discharge to the City's sewerage system.

#### 3 . RECORDS RETENTION

The Industrial User shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence and any and all summaries thereof, relating to monitoring, sampling and chemical analysis made by or in behalf of the user in connection with its discharge.

All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City shall be retained and preserved by the Industrial User until all enforcement activities brought by the City shall be retained and preserved by the Industrial User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

#### 4 . CONFIDENTIAL INFORMATION

Except for data determined to be confidential under Section 4-7 of the City's Ordinance, all reports required by this permit shall be available for public inspection at the office of the Sewer Superintendent.

#### 5 . RECORDING OF RESULTS

For each measurement or sample taken pursuant to the requirements of this permit, the user shall record the following information:

- a) The exact place, date, and time of sampling;
- b) The dates the analysis were performed;
- c) the person(s) who performed the analysis;

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Permit No. : 039

d) The analytical techniques or methods used; and

e) The results of all required analyses.

#### **6 . DILUTION**

No Industrial User shall increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

#### **7 . PROPER DISPOSAL OF PRETREATMENT SLUDGES AND SPENT CHEMICALS**

The disposal of sludges and spent chemicals generated shall be done in accordance with Section 405 of Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

#### **8 . SIGNATORY REQUIREMENTS**

All reports required by this permit shall be signed by a principal executive officer of the User, or his designee.

#### **9 . REVOCATION OF PERMIT**

The permit issued to the Industrial User by the City may be revoked when, after inspection, monitoring or analysis it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State, and local laws, ordinances, or regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any other required reporting form, shall be cause for permit revocation.

#### **10 . LIMITATION ON PERMIT TRANSFER**

Wastewater discharge permits are issued to a specific user for a specific operation and are not assignable to another user or transferable to any other location without the prior written approval of the City. Sale of a User shall obligate the purchaser to seek prior written approval of the City for continued discharge to the sewerage system.

#### **11 . FALSIFYING INFORMATION OR TAMPERING WITH MONITORING EQUIPMENT**

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of the City, as well as being subjected to civil penalties and relief.

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Page 7 of 8

Permit No.: 039

**12 . MODIFICATION OR REVISION OF THE PERMIT**

a) the terms and conditions of this permit may be subject to modification by the City at any time as limitations or requirements as identified in the City's Ordinance, are modified or other just cause exists.

b) This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.

c) The terms and conditions may be modified as a result of EPA promulgating a new federal pretreatment standard.

d) Any permit modifications which result in new conditions in the permit shall include a reasonable time schedule for compliance of necessary.

**13 . DUTY TO REAPPLY**

The City shall notify a User thirty (30) days prior to the expiration of the User's Permit. Within fifteen (15) days of notification, the User shall reapply for reissuance of the permit on a form provided by the City.

**14 . SEVERABILITY**

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

**15 . PROPERTY RIGHTS**

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of Federal, State, or Local regulations.

**16 . BYPASS OF TREATMENT FACILITIES**

- a) Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist.
  
- b) The permittee may allow bypass to occur which does not cause effluent limitations to be exceeded, but only if it is for essential maintenance to assure efficient operation.
  
- c) Notification of bypass:
  - 1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten days before the date of the bypass to the City of DeQueen Wastewater Department.
  
  - 2) Unanticipated bypass. The permittee shall immediately notify the City of DeQueen Wastewater Department and submit a written notice to the Department within 5 days. This report shall specify:
    - i) A description of the bypass, and its cause, including its duration:
    - ii) Whether the bypass has been corrected; and
    - iii) The steps being taken or to be taken to reduce, eliminate and prevent a reoccurrence of the bypass.

**17 . PENALTIES FOR VIOLATIONS OF PERMIT CONDITIONS**

The City of DeQueen's Sewer use Ordinance #634 provides that any person who violates a permit condition is subject to a civil penalty of at least \$1000. per day of such violation. Any person who willfully or negligently violates permit conditions is subject to criminal penalties of a fine of \$1000. per day of violation. The permittee may also be subject to sanctions under State and or Federal laws.

## FACT SHEET

- 1) **Description of Operation** : Live chickens are killed & processed into packaging for sale, new pretreatment plant went online 1996.
- 2) **Production Data** : @ 1150\_employees 16 hr processing / 8 hr cleanup, 300,000 birds killed daily.
- 3) **Processes / Flows** : All drains in production, truck wash & tray wash areas flow to pretreatment wet well.
- 4) **Classification** : Significant, high wastewater flow ( 1.60mgd to 1.80mgd ) above domestic BOD & TSS.
- 5) **Monitoring** : 24hrs / 7 days a week, flow metered at IU discharge, a weeks worth of results taken Monday through Sunday each month will be used for surcharge and permit sampling.
- 6) **Parameters Monitored** : BOD,TSS,OIL & GREASE,PH,TKN.NH3,TP,FLOW  
BOD - (550mg/l 30day ave.)

New Verticel (startup August 08) system has the capacity to treat 26,582 lbs of BOD, 50% = 13,291 lbs at 2.00mgd that's 796 mg/l

Surcharge ord. changed May 2007  
New refrigerated sampler added May 2006.  
\$ 1,000 lab fee charged each month.  
July 08 sewer monthly bill start using wastewater flow meter by Ord.

B-9/9

City of De Queen

Page 1 of 1

Industrial Inspection Report

Date Aug 1-2012

Time 9:00-9:45

Inspector #1: Michael Sims

Inspector #2: \_\_\_\_\_

Industry Name: Pilgrims Pride

Street Address: 123 W Park DeQueen Ar

Mailing Address: Po Box 389 DeQueen Ar 71832

Year Industry Was Established On Site: 1954

Contact Person: Darry Crawford Eddie Hatten Cody Butler

Title: Maint/Pretreat Plant Manager operator

Phone Number: 584-5000

Average Number of Employees: 1100-1150 Shifts: 2 production 1-cleanup

Working Hours Per Day: 16 production - 8 cleanup Per Week: 80 prod. 40 cleanup

S.I.C. Code Number: 2015

Inspected Pretreatment Building - needs some cleanup but overall OK

Raw Materials: chickens

Process Description: live chickens, killed cut up packaged, shipped out inspected pretreat next area, DAPS, Poly-Ferriz: caustic channels, pumps eff flame meter, outside building, sludge tanker

● SLUG LOAD POTENTIAL: no potential seen or noted

Products: chickens

Report Completed By: [Signature] Date: 8-1-12

Inspectors Time Involved: #1 45 min #2 \_\_\_\_\_

C-2/1 "



# De Queen POTW Influent

Date	Flow MGD	CBOD Conc mg/l	CBOD Mass lbs/day	TSS Conc mg/l	TSS Mass lbs/day	NH3-N Conc mg/l	NH3-N Mass lbs/day	TP mg/l	TP Mass lbs/day
1/11	2.13	300	5329	144	2558	7.8	137.7	6.99	124.2
2/11	2.397	233	4658	130	2599	10.8	214.9	4.37	87.4
3/11	2.323	210	4069	135	2615	27.2	527.0	6.92	134.1
4/11	2.529	189	3986	118	2489	23.3	491.4	6.06	127.8
5/11	2.732	150	3418	115	2620	27.1	617.5	4.81	109.6
6/11	2.284	202	3848	127	2419	22.7	432.4	6.25	119.1
7/11	2.171	316	5722	165	2988	21.9	396.5	6.58	119.1
8/11	1.773	439	6491	195	2883	19.5	288.3	8.10	119.8
9/11	2.379	173	3432	117	2321	19.5	386.9	6.81	135.1
10/11	2.21	163	3004	100	1843	18.5	341.0	5.58	102.8
11/11	2.397	145	2899	79	1579	22.6	451.8	5.63	112.5
12/11	2.788	191	4441	96	2232	25.0	581.3	5.17	120.2
1/12	2.32	173	3347	108	2090	24.7	477.9	7.25	140.3
2/12	2.531	136	2871	63	1330	31.8	670.2	6.89	145.4
3/12	2.729	212	4825	118	2686	23.6	537.1	7.91	180.0
4/12	2.131	282	5012	208	3697	20.0	355.5	7.92	140.8
5/12	2.11	358	6300	277	4874	20.6	362.5	8.70	153.1
6/12	2.077	402	6964	297	5145	19.5	337.8	8.90	154.2
7/12	1.778	307	4552	317	4701	17.9	265.4	8.71	129.2
8/12	2	292	4871	231	3853	23.6	393.6	9.61	160.3
9/12	1.889	461	7263	343	5404	25.6	403.3	13.98	220.2
<b>Maximum</b>	<b>MGD</b> 2.788	<b>mg/l</b> 461	<b>lbs/day</b> 7263	<b>mg/l</b> 343	<b>lbs/day</b> 5404	<b>mg/l</b> 31.8	<b>lbs/day</b> 670	<b>mg/l</b> 13.98	<b>lbs/day</b> 220.2
<b>Design</b>	<b>4</b>	<b>230</b>	<b>7673</b>	<b>137</b>	<b>4570</b>	<b>28.0</b>	<b>934.1</b>	<b>N/A</b>	<b>N/A</b>

D-1/1

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

June 21, 2012

**WATER DIVISION**  
**NPDES Enforcement Section**

**RE: City of De Queen Wastewater Plant, NPDES Permit AR0021733  
AFIN 67-00023, May DMR, SSO & Non-Compliance report.**

Michael Sims  
City of De Queen  
Wastewater Superintendent  
PO Box 730  
De Queen AR 71832

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# CITY OF DE QUEEN WASTEWATER DEPT.

May 2012  
NONCOMPLIANCE REPORT  
NPDES No. AR0021733      AFIN:67-00023

**Date:** June 21, 2012

**NON-COMPLIANCE DESCRIPTION:** The City of De Queen experienced elevated ammonia nitrogen levels in its effluent the first week of May 2012, resulting in noncompliance with the ammonia nitrogen permit; 7 day & monthly averages:

Weekly max 8.3mg/l and monthly avg. 2.21mg/l

Limits weekly max 3mg/l and monthly avg. 2mg/l

**CAUSES FOR NON-COMPLIANCE:** An excessive amount of water from the pond was turned back into the plant for treatment (this is done to lower the level in the pond to get ready for a rain event) this water had elevated ammonia in it. Testing on this flow was not done in a timely manner as it would have shown high ammonia numbers. When it was found to have a large amount of ammonia the flow was turned down so the plant could handle it. But the ammonia numbers for that week were elevated causing the weekly max. and monthly avg. to be over limits.

**ACTIONS BEING TAKEN:** In the future the pond water will be tested for ammonia before it is run back through the plant and the flow will be set so the plant can handle it.

The second week of May the ammonia numbers were under limits.

Sincerely;



Michael Sims  
City of De Queen  
Wastewater Supt.

E - 2/2

**Environmental Protection Agency  
Integrated Compliance Information System  
Violations Report**

Created Date: 09/15/2010  
Refresh Date: 09/19/2012  
Report Version 1.2, Modified: 01/03/2011

**AR0021733**

**Effluent Violations**

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	05/31/2012	001-A	00610 - Nitrogen, ammonia total (as N)	1	0	1		C2 MO AVG	2.21 mg/l	11%	<=2 mg/l		
E90	05/31/2012	001-A	00610 - Nitrogen, ammonia total (as N)	1	0	1		C3 7 DA AVG	8.3 mg/l	177%	<=3 mg/l		
E90	08/31/2011	001-A	00610 - Nitrogen, ammonia total (as N)	1	0	1		C2 MO AVG	2.73 mg/l	37%	<=2 mg/l		
E90	08/31/2011	001-A	00610 - Nitrogen, ammonia total (as N)	1	0	1		C3 7 DA AVG	9.8 mg/l	227%	<=3 mg/l		
E90	09/30/2010	001-A	00610 - Nitrogen, ammonia total (as N)	1	0	1		C3 7 DA AVG	4.9 mg/l	63%	<=3 mg/l		
E90	07/31/2010	001-A	00610 - Nitrogen, ammonia total (as N)	1	0	1		C3 7 DA AVG	5.9 mg/l	97%	<=3 mg/l		

F-1/1

**Schedule Violations**

Violation Code	Sch. Event Code	Schedule Date	Actual Date	Report Received Date	EA Identifier	Sch. Num.	Sch. Type	Schedule Event/ Comments	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
C40	CS016	10/01/2009	11/04/2009	11/19/2009	AR-N00007163-1	1	A	Complete Required Work or On-Site Construction Comment: END CONSTRUCTION		
C30	CS016	10/01/2009	11/04/2009	11/19/2009	AR-N00007163-1	1	A	Complete Required Work or On-Site Construction Comment: END CONSTRUCTION		

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g. \*\*X\*\*) indicate the NODI code will not automatically resolve RNC.  
Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

# Arkansas Analytical, Inc.

Toxicity Test Results  
City of DeQueen  
NPDES PERMIT NUMBER: AR0021733  
Fourth Quarter 2010  
AFIN # 67-00023

Fathead Minnow, *Pimephales promelas*, Larval Survival and Growth Test  
Test 1000.0

*Ceriodaphnia dubia*, Survival and Reproduction Test  
Test 1002.0

Prepared for: **Mr. Mike Sims**  
**City of DeQueen**  
**P.O. Box 730**  
**DeQueen, Arkansas 71832**

Prepared by: Arkansas Analytical, Inc.  
11701 I-30, Bldg 1, Suite 115  
Little Rock, Arkansas 72209  
**Lab Number K1012006**

Wednesday, December 29, 2010

G-1/4

## Summary of Results City of DeQueen

<i>Ceriodaphnia dubia</i>		<i>Pimephales promelas</i>	
NOEC / LOEC Survival	100% / NA	NOEC / LOEC survival	56% / 75%
NOEC / LOEC Reproduction	100% / NA	NOEC / LOEC growth	56% / 75%
Mean number of neonates (critical dilution)	19.2	%CV survival (critical dilution)	33.5%
%CV Reproduction (critical dilution)	25.1%	Mean dry weight (critical dilution) in milligrams	0.180
		%CV growth (critical dilution)	31.5%
PMSD Reproduction	31.0%	PMSD Growth	37.0

### Conclusion


Chronic static renewal larval survival and growth test using fathead minnow, *Pimephales promelas*, (Method 1000.0)



The permit issued to the City of DeQueen, AR0021733, specifies that the **critical dilution is 100% effluent**. The effluent samples **did** exhibit lethal and sublethal effects at the critical dilution, and, as such, **failed** both portions of the test.

Chronic static renewal survival and reproduction test using *Ceriodaphnia dubia*, (Method 1002.0)

The permit issued to the City of DeQueen, AR0021733, specifies that the **critical dilution is 100% effluent**. The effluent samples **did not** exhibit lethal effects or sublethal effects at the critical dilution, and, as such, **passed** both portions of the test.

Biomonitoring Analysts:

  
Kenneth Pigue

   
Whitney Fuhr

G - 2/4

# Arkansas Analytical, Inc.

Toxicity Test Results  
City of DeQueen  
NPDES PERMIT NUMBER: AR0021733  
First Quarter 2011  
AFIN # 67-00023

## *P. promelas* Growth Failure Retest

Fathead Minnow, *Pimephales promelas*, Larval Survival and Growth Test  
Test 1000.0

*Ceriodaphnia dubia*, Survival and Reproduction Test  
Test 1002.0

Prepared for: **Mr. Mike Sims**  
**City of DeQueen**  
**P.O. Box 730**  
**DeQueen, Arkansas 71832**

Prepared by: Arkansas Analytical, Inc.  
11701 I-30, Bldg 1, Suite 115  
Little Rock, Arkansas 72209  
**Lab Number K1101007**

Monday, February 07, 2011

G-3/4

**Revised**  
**Summary of Results**  
City of DeQueen

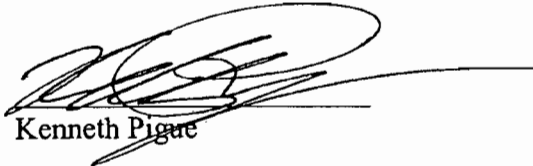
<i>Pimephales promelas</i>	
NOEC / LOEC survival	100% / NA
NOEC / LOEC growth	100% / NA
%CV survival (critical dilution)	5.73%
Mean dry weight (critical dilution) in milligrams	0.370
%CV growth (critical dilution)	8.14%
PMSD Growth	16.4%

**Conclusion**

Chronic static renewal larval survival and growth test using fathead minnow, *Pimephales promelas*, (Method 1000.0)

The permit issued to the City of DeQueen, AR0021733, specifies that the **critical dilution is 100% effluent**. The effluent samples **did not** exhibit lethal or sublethal effects at the critical dilution, and, as such, **passed** both portions of the test.

Biomonitoring Analysts:

  
Kenneth Pigue



## WHOLE EFFLUENT TOXICITY TESTING SUMMARY

Permit Number: **AR0021733**      AFIN: **67-00023**  
Facility Name: **City De Queen**      Outfall Number: **001**  
Critical Dilution: **100%**      Testing Frequency: **once per quarter**  
Date of Review: **9/19/12**      Name of Reviewer: **M. Barnett**

Number of tests performed during previous 5 years by species:

***Pimephales promelas* (Fathead minnow): 22**

***Ceriodaphnia dubia* (water flea): 19**

Failed test dates during previous 3 years by species:

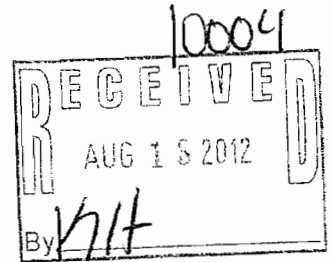
<b><i>Pimephales promelas</i> (Fathead minnow):</b>	<u>Lethal</u>	<u>Sub-lethal</u>
	12/2010	6/2010
		7/2010
		8/2010
		12/2010
<b><i>Ceriodaphnia dubia</i> (water flea):</b>	<u>Lethal</u>	<u>Sub-lethal</u>
	None	None

Facility has lethal WET limits for both species.

No TRE activities, the current permit does not contain TRE language.

H - 1/1

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118



August 3, 2012

**Rufus Torrence**  
**Pretreatment Engineer**  
**WATER DIVISION**

**RE: City of De Queen Wastewater Plant, NPDES Permit AR0021733**  
**AFIN 67-00023, Annual pretreatment Report.**

Michael Sims  
City of De Queen  
Wastewater Superintendent  
PO Box 730  
De Queen AR 71832

- ① inf/eff logged
- ② ICIS-Coded
- ③ IU's checked
- ④ Annual Report Form Updated

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: August, 2011 TO July, 2012**  
**TREATMENT PLANT: City of De Queen NPDES PERMIT #AR0021733**  
**AVERAGE POTW FLOW: 2.20 MGD % IU FLOW: 60%**

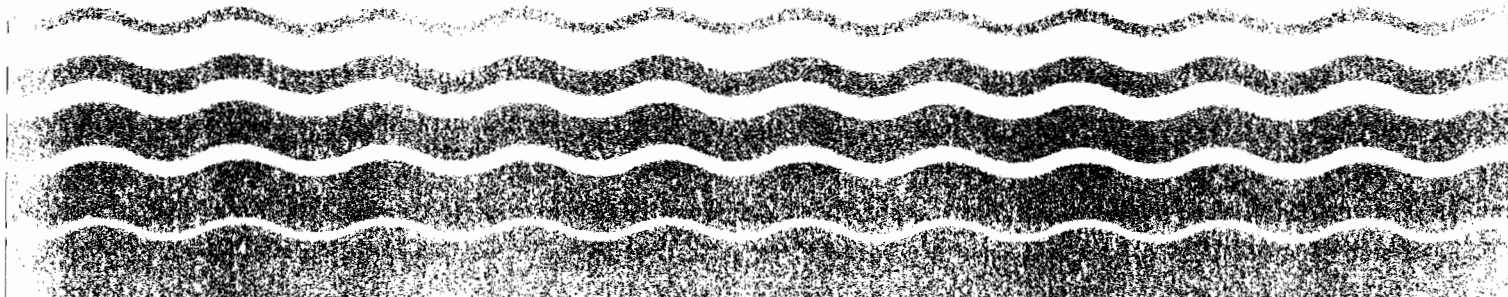
METALS, CYANIDE and PHENOLS (Total)	MAHC mg/l (2)	INFLUENT DATES SAMPLED (ug/l) 2/yr				WQ level/ limit mg/l (2)	EFFLUENT DATES SAMPLED (ug/l) 2/yr				LABORATORY ANALYSIS		
		3/7/12		7/17/12			3/7/12		7/17/12		EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
Antimony	N/A	<del>0.0</del> <del>&lt;60.0</del>	<del>0.0</del> <del>&lt;60.0</del>	<del>0.0</del> <del>&lt;60.0</del>	N/A	<del>0.0</del> <del>&lt;60.0</del>	<del>0.0</del> <del>&lt;60.0</del>	<del>0.0</del> <del>&lt;60.0</del>	<del>0.0</del> <del>&lt;60.0</del>	60	200.7	60	
Cadmium		<del>0.0</del> <del>&lt;0.500</del>	<del>0.0</del> <del>&lt;0.500</del>	<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>	<del>0.0</del> <del>&lt;0.500</del>	<del>0.0</del> <del>&lt;0.500</del>	<del>0.0</del> <del>&lt;0.500</del>	0.5	200.7	0.5	
Copper		28.1		16.4		3.84		7.48		0.5	3113B	0.5	
Lead		<del>0.0</del> <del>&lt;0.500</del>		0.730		<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>		0.5	3113B	0.5	
Mercury		<del>0.187</del> <del>187 ng/l</del>	<del>0.0623</del> <del>62.3 ng/l</del>	<del>0.0623</del> <del>62.3 ng/l</del>		<del>0.00073</del> <del>0.73 ng/l</del>	<del>0.00374</del> <del>3.74 ng/l</del>	<del>0.00374</del> <del>3.74 ng/l</del>	<del>0.00374</del> <del>3.74 ng/l</del>	.005	1631E&24 5.7	.005	
Nickel		12.0		10.3		3.94		4.40		0.5	3113B	0.5	
Selenium		<del>0.0</del> <del>&lt;5.00</del>		<del>0.0</del> <del>&lt;5.00</del>		<del>0.0</del> <del>&lt;5.00</del>		<del>0.0</del> <del>&lt;5.00</del>		5	3113B	5	
Silver		<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>		0.5	3113B	0.5	
Zinc		183		156		22.3		50.2		20	200.7	20	
Chromium		<del>0.0</del> <del>&lt;10.0</del>		<del>0.0</del> <del>&lt;10.0</del>		<del>0.0</del> <del>&lt;10.0</del>		<del>0.0</del> <del>&lt;10.0</del>		10	200.7	10	
Cyanide		<del>0.0</del> <del>&lt;10.0</del>		<del>0.0</del> <del>&lt;10.0</del>		<del>0.0</del> <del>&lt;10.0</del>		<del>0.0</del> <del>&lt;10.0</del>		10	4500CNE/ 9014	10	
Arsenic		<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>		0.750		<del>0.0</del> <del>&lt;0.500</del>		0.5	3113B	0.5	
					N/A					--			
Phenols	N/A	34		37	N/A	<del>0.0</del> <del>&lt;5.0</del>		<del>0.0</del> <del>&lt;5.0</del>		5	420.1/9065	5	
Beryllium		<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>		0.5	279.2	0.5	
Thallium	N/A	<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>	N/A	<del>0.0</del> <del>&lt;0.500</del>		<del>0.0</del> <del>&lt;0.500</del>		0.5	279.2	0.5	
Flow, MGD	N/A	2.598		2.203	N/A	2.330		2.114					
(3)													
Toluene				24.9				<del>0.0</del>					

I-2/2



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# Local Limits Development Guidance Appendices



J-1/2

# APPENDIX V - DOMESTIC POLLUTANT LOADINGS

## Residential/Commercial Trunkline Monitoring Data

Pollutant	Number of Detections	Number of Samples	Minimum Concentration (mg/L)	Maximum Concentration (mg/L)	Average Concentration (mg/L)
INORGANICS					
Arsenic	140	205	0.0004	0.088	0.007
Barium	3	3	0.04	0.216	0.115
Boron	4	4	0.1	0.42	0.3
Cadmium	361	538	0.00076	0.11	0.008
Chromium (III)	1	2	< 0.005	0.007	0.006
Chromium (T)	311	522	< 0.001	1.2	0.034
Copper	603	607	0.005	0.74	0.14
Cyanide	7	7	0.01	0.37	0.082
Fluoride	2	2	0.24	0.27	0.255
Iron	18	18	0.0002	3.4	0.989
Lead	433	540	0.001	2.04	0.058
Lithium	2	2	0.03	0.031	0.031
Manganese	3	3	0.04	0.161	0.087
Mercury	218	235	< 0.0001	0.054	0.002
Nickel	313	540	< 0.001	1.6	0.047
Phosphate	2	2	27.4	30.2	28.8
Total Phosphorous	1	1	0.7	0.7	0.7
Silver	181	224	0.0007	1.052	0.019
Zinc	636	638	0.01	1.28	0.231
ORGANICS					
Chloroform	21	30	<0.002	0.069	0.009
1,1-Dichloroethene	2	29	0.005	0.008	0.007
1,1-Dichloroethane	1	28	0.026	0.026	0.026
Trans-1,2-Dichloroethene	1	28	0.013	0.013	0.013
Fluoranthene	2	5	0.00001	<0.001	0.001
Methylene Chloride	7	30	0.00008	0.055	0.027
Phenols	2	2	0.00002	0.00003	0.000025
Bis (2-ethylhexyl) Phthalate	5	5	0.00002	0.022	0.006
Pyrene	2	3	0.00001	<0.005	0.0002
Tetrachloroethene	5	29	0.00001	0.037	0.014
1,2,4-Trichlorobenzene	1	3	<0.002	0.035	0.013
PESTICIDES					
Total BHC	3	3	0.001	0.001	0.001
4,4-DDD	3	3	0.00026	0.0004	0.0003
Total Endosulfan	3	3	0.002	0.002	0.002

V-1  
J-2/2

CONTRACTS AND SPECIFICATIONS

FOR AN UPGRADE TO THE

WASTEWATER TREATMENT FACILITY

to serve the

CITY OF DE QUEEN

PREPARED FOR

THE CITY OF DE QUEEN  
SEVIER COUNTY, ARKANSAS

BY

VAUGHN ENGINEERING, INC.

403 DEQUEEN STREET  
MENA, ARKANSAS 71953

30,354,070.02

WATER

Contract Sum To Date

Net

Orig

Net

K-1/2

- 1.2 Warranties and guarantees by the suppliers of various components in lieu of a single source responsibility by the equipment manufacturer will not be accepted. The equipment manufacturer shall be solely responsible for the warranty of the equipment and all related components.
- 1.3 In the event a component fails to perform as specified or is proven defective in service during the warranty period, excluding items of supply normally expended during operation, the manufacturer shall provide a replacement part without cost to the Owner.
- 1.4 This warranty shall be valid only if the product is properly serviced and operated under normal conditions and in accordance with the manufacturer's instructions.

**2.0 PROCESS PERFORMANCE GUARANTEE**

- 2.1 The SUPPLIER shall be responsible for the process performance of the wastewater treatment unit and shall guarantee the wastewater treatment unit effluent quality. Guaranteed Performance is based upon the Design Basis for the wastewater treatment unit as detailed in Table 1.

Table 1: DESIGN BASIS for Wastewater Treatment Unit		
Parameter	Value	Units
Influent Average Daily Flow	4	MGD
Influent CBOD	230	mg/L
Influent TSS	137	mg/L
Influent TKN	35	mg/L
Influent NH <sub>3</sub> - N	28	mg/L
Influent pH	6 - 8	units
Effluent CBOD	10 or less	mg/L
Effluent TSS	15 or less	mg/L
Effluent NH <sub>3</sub> - N	2 or less	mg/L
Effluent NO <sub>3</sub>	10 or less	mg/L
Effluent pH	6 - 9	units
Effluent D.O. **	6 - 8	mg/L

\*\* Post aeration exists for this facility.

**2.2 PROCESS PERFORMANCE TESTING**



- 2.2.1 The effluent quality performance of the wastewater treatment unit will be demonstrated by analysis of a number of samples taken over a reasonable length of time. Tests to determine compliance with this guarantee must be conducted by the Owner within a period not to exceed 90 days after start-up, or 120 days after completion, whichever occurs first. Lack of completion of tests within the specified period will constitute compliance with the effluent criteria. The performance test will demonstrate that the SUPPLIER has complied with the effluent quality criteria specified in the contract documents.
- 2.2.2 The OWNER shall be responsible for carrying out the performance testing, for collecting all samples, for carrying out all laboratory tests and for keeping such detailed records as


K-2/2

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

MEMORANDUM

TO: Mo Shafii, Assistant Chief, Water Division 

THROUGH: John Bailey, Permit Branch Manager   
Kim Fuller, Engineer Supervisor 

FROM: Rufus Torrence, NPDES Permit Engineer 

SUBJECT: AR0021733 Discontinue City of De Queen Pretreatment Program

DATE: November 14, 2012

The Assistant Water Division Chief's approval is requested to revise the City of De Queen NPDES Permit to remove the requirement to operate an industrial pretreatment program. The existing permit will expire on February 28, 2013. Pending the Assistant Chief's approval, the requirements for a Pretreatment Program will be deleted from the renewal permit which is currently under review. The City will be required to comply with only the General and Specific prohibitions listed in 40 CFR 403.5.

In 1984 EPA required the City to develop a pretreatment program to control Pilgrim Pride (the sole SIU). Pilgrim was discharging over 50% of the organic loading to the POTW and the excessive organic loading caused the City to violate the BOD and TSS limits in the NPDES permit. The City developed local limits for BOD and TSS. These limits were effective in controlling Pilgrim's discharge. However, recently the POTW had trouble complying with the NH3-N limits.

In 2009 the City upgraded the treatment plant from a lagoon system to a Vertical Loop Reactor. The upgrade was specifically designed to treat the organic loading from Pilgrim and to remove NH3-N. The POTW has a good compliance history for NH3-N since 2009. The plant was retrofitted with Luxury Phosphorus Uptake to comply with the new TP limits. The POTW also has good compliance with the TP limits.

Pilgrim's wastewater no longer poses a threat for chronic Interference and Pass Through.