

Peltier, Hannah

From: Torrence, Rufus
Sent: Friday, May 03, 2013 9:29 AM
To: Denise Bosnick
Cc: Peltier, Hannah
Subject: AFIN 18-00109 AR0022039 City of West Memphis 2012 Annual Report
Attachments: WMPS 2012 Annual Report.pdf; ICIS WMPS 2012.pdf



May 3, 2012

Denise Bosnick, Director of Environmental Quality
West Memphis Utility Commission
604 East Cooper
West Memphis, Arkansas 72301

Re: City of West Memphis 2012 Annual Report
(Permit No. AR0022039, AFIN 18-00109)

Dear Ms. Bosnick:

The Department has reviewed the City's 2012 Annual Pretreatment Report, and the report is complete. However, the Department has two concerns:

1. The City only needs to publish the Significant Industrial Users (SIUs) which are in SNC in the local newspaper. The City does not need to include the Non-Significant Industrial Users (NSIUs) in newspaper publications. The City published ATM Oil (NSIU) in the local newspaper. The intent of designating Users as "non-significant" is to remove them from state and federal oversight. ADEQ and EPA do not require NSIUs in SNC to be published in the local newspaper.
2. Please list all NOV's on Attachment B. The City listed only two (2) NOV's on Attachment B while Section IV of Attachment C shows thirty-three (33) NOV's.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us .

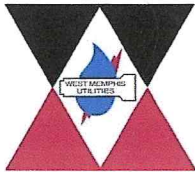
Sincerely,



Rufus Torrence, Pretreatment Engineer
Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL C
5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPH
www.adeq.state.ar.us

BOH HS
RT



WEST MEMPHIS UTILITY COMMISSION
604 East Cooper PO Box 1868
West Memphis, Arkansas 72301
Phone (870) 735-3355 Fax (870) 732-7623

April 19, 2013

Rufus Torrence
NPDES Pretreatment Coordinator
Arkansas Department of
Environmental Quality
5301 Northshore Drive
Little Rock, AR 72118-5317



Dear Mr. Torrence,

In order to comply with 40 CFR part 403, the General Pretreatment Regulation, and our NPDES permit (AR00022039) the following is submitted to you:

- 1) Pretreatment Performance Summary,
- 2) Monitoring results for the annual pretreatment report,
- 3) Copy of the statement to be submitted to the largest newspaper in the municipality (Evening Times) for publication during the month April and;
- 4) The following statement: For this reporting period March 2012 - February 2013 there were three significant violators for this reporting period.

Automated Conveyors
3850 Southland Drive
West Memphis, AR 72301

This was due to Chronic violations and Technical Review Criteria (TRC) violation.

ATM Oil
435 Dacus Road
Marion, AR 72364

This was due to Chronic violations and Technical Review Criteria (TRC) violations.

Stateside Steel
304 Wyanoke Road
West Memphis, AR 72301

This was due to Technical Review Criteria (TRC) violations.

- ① Inf/eff loggers
- ② ICIS Coded/
cover letter data
- ③ IU's checked
- ④ Annual Report data
updated

I trust this fulfills the requirements. Please let me know if further information is required.

Sincerely,



Denise Bosnick
Director of Environmental Quality

011 LEGAL NOTICES

The West Memphis Utility Commission and the City of West Memphis is required in its National Pollutant Discharge Elimination System Permit (NPDES) to list significant violators to the Industrial pretreatment program. This is a requirement by the United States Environmental Protection Agency and the State of Arkansas Department of Environmental Quality.

For this reporting period March 2012 - February 2013 there were three significant violators for this reporting period.

Automated Conveyors
3850 Southland Drive
West Memphis, AR 72301
This was due to Chronic violets and Technical Review Criteria (TRC) violations.

ATM Oil
435 Dacus Road
Marion, AR 72364
This was due to Chronic violets and Technical Review Criteria (TRC) violations.

Stateside Steel
304 Wyanoke Road
West Memphis, AR 72301
This was due to Technical Review Criteria (TRC) violations.

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2012 TO February 28, 2013
TREATMENT PLANT: City of West Memphis NPDES PERMIT #AR0022039
AVERAGE POTW FLOW: 4.6 MGD % IU FLOW: 16%

METALS, CYANIDE and PHENOLS	MAHC (Total) (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/quarter						WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/quarter						LABORATORY ANALYSIS		
		Date		Date		Date			Date		Date		EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)		
		Date	Date	Date	Date	Date	Date		Date	Date							
		5/30/2012	8/13/2012	11/19/2012	2/5/2013	5/30/2012	8/13/2012		11/19/2012	2/5/2013							
Antimony	N/A	0.252	0.224	0.303	0.438	N/A	N/A	0.100	0.438	0.303	0.438	0.100	EPA-200.8	1.00			
Cadmium	12.2	0.252	0.224	0.303	0.438	6510.0	6510.0	<1.00	0.438	0.303	<0.100	<0.100	EPA-200.8	0.100			
Copper	517.0	45.1	70.4	69.3	80.3	21200.0	21200.0	7.43	80.3	7.31	7.31	8.70	EPA-200.8	0.500			
Lead	132.3	1.99	2.85	3.33	3.45	30630.0	30630.0	0.738	3.45	<0.500	<0.500	0.673	EPA-200.8	0.500			
Mercury	.0091	.0286	.107	.0278	.0116	.0340	.0340	.00168	.0116	.00269	.00344	.00344	EPA-1631E	.0005			
Nickel	96.1	3.00	3.75	4.31	4.38	829050.0	829050.0	2.63	4.38	2.95	2.95	3.05	EPA-200.8	0.500			
Selenium	19.2	0.326	0.277	1.30	<1.00	10910.0	10910.0	0.326	1.30	1.23	1.23	<1.00	EPA-200.8	2.00			
Silver	250.0	0.326	0.592	0.277	0.132	4260.0	4260.0	0.326	0.132	<0.100	<0.100	<0.100	EPA-200.8	0.100			
Zinc	429.0	102	176	198	151	174030.0	174030.0	103	151	99.4	99.4	63.4	EPA-200.8	5.00			
Chromium	351.7	2.96	3.26	3.62	4.86	1230840.0	1230840.0	1.32	4.86	2.13	2.13	1.59	EPA-200.8	1.00			
Cyanide	100.0	0.326	0.277	<1.00	14	12200.0	12200.0	0.326	14	<1.00	<1.00	<1.00	SM-4500-CN-E	10			
Arsenic	16.0	1.45	1.67	1.84	1.54	361640.0	361640.0	1.44	1.54	<0.500	<0.500	2.15	EPA-200.8	0.500			
Molybdenum	14.4					N/A	N/A							--			
Phenols	N/A	0.326	0.277	0.326	0.277	N/A	N/A	0.326	0.277	35.1	35.1	<0.500	EPA-420.1(Low Level)	5			
Beryllium	100.0	0.326	0.277	<0.500	<0.500	15200.0	15200.0	<0.500	<0.500	<0.500	<0.500	<0.500	EPA-200.8	0.500			
Thallium	N/A	<0.500	<0.500	<0.100	<0.100	N/A	N/A	<0.500	<0.100	<0.100	<0.100	<0.100	EPA-200.8	0.100			
Flow, MGD	N/A					N/A	N/A										
Phosphorus		4920	3950	4590	4620			450	4620			5320	SM-4500-PE	625			
Benzene					1.30				1.30					1.00			
Chlorobenzene					1.14				1.14					1.00			
Chloroform					1.29				1.29					1.00			
Ethylbenzene		1.87			22.0				22.0			7.81		1.00			
beta-BHC					0.03984Q				0.03984Q					0.00408			
Endosulfan II					0.01097Q				0.01097Q					0.00408			
Naphthalene					5.93				5.93					5.10			

Phenol	114	16.9				5.10	625
Bis(2-ethylhexyl)phthalate	272	682		154		10.2	625
1,4-Dichlorobenzene	2.41					1.00	624
Toluene	6.05					5.00	624
Aldrin	0.00424					0.00408	608
delta-BHC	0.00918Q					0.00408	608
4,4'-DDE	0.00521					0.00408	608
4,4'-DDT	0.00758Q			0.01144		0.00408	608

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant.

Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.

(2) This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

(4) Qualifier -- Q RPD >40% dual column results

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration

WQ - "Water Quality Levels not to exceed" OR actual permit limit.

ATTACHMENT A

PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (C, NC, or SNC)				Permit Limits	
			Y/N	Last Action				BMR	Reports				Self Monitoring
									90-day Compliance	Semi Annual	Annual		
Automated Conveyors <i>**Only discharge to the city Sewer when they clean their equipment</i>	333922		Y	6/1/2011	N	0	1	Y	N/A	N/A	N/A	N/A	SNC
ATM Oil	562219		Y	3/1/2005	N	0	133	N/A	N/A	N/A	N/A	N/A	SNC
Coca-Cola Bottling	312111		Y	6/1/2011	N	0	90	N/A	N/A	N/A	N/A	N/A	NC
Grace Trailer	811192		Y	6/1/2011	N	0	129	Y	N/A	N/A	N/A	N/A	NC
Langston Bag	322224		Y	6/1/2011	N	0	99	N/A	N/A	N/A	N/A	N/A	NC
Nu-Way	325612		Y	6/1/2011	N	0	2	N/A	N/A	N/A	N/A	N/A	C
Qualawash Services	811192		Y	6/1/2011	N	0	66	Y	N/A	N/A	N/A	N/A	NC
Stateside Steel	331222		Y	3/24/2010	N	0	71	Y	N/A	N/A	N/A	N/A	SNC

ATTACHMENT C

PRETREATMENT PERFORMANCE SUMMARY (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY ADEQ. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT DEPARTMENT AUTHORIZATION.

I. General Information

Control Authority Name West Memphis Utility Commission

Address 604 East Cooper / P O Box 1868

City West Memphis State/Zip Arkansas / 72301

Contact Person Denise Bosnick Position Director of Environmental Quality

Contact Telephone 870-735-3355 NPDES Permit Nos. AR0022039

Reporting Period March 2012 February 2013
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs Four

Total Number of Significant Noncategorical IUs Zero

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

II. Significant Industrial User Compliance

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

III. Compliance Monitoring Program

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

1) No. of Control Documents Issued/Total No. Required.	<u>4 / 4</u>	<u>0 / 0</u>
2) No. of Nonsampling Inspections Conducted.	<u>0 / 4</u>	<u>0 / 0</u>
3) No. of Sampling Visits Conducted.	<u>267</u>	<u>0</u>
4) No. of Facilities Inspected (nonsampling)	<u>0 / 4</u>	<u>0 / 0</u>
5) No. of Facilities Sampled	<u>4 / 4</u>	<u>0 / 0</u>

IV. Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

1) No. of Compliance Schedules Issued/No. of Schedules Required	<u>0 / 0</u>	<u>0 / 0</u>
2) No. of Notices of Violations Issued to SIUs	<u>33</u>	<u>0</u>
3) No. of Administrative Orders Issued to SIUs	<u>0</u>	<u>0</u>
4) No. of Civil Suits Filed.	<u>0</u>	<u>0</u>
5) No. of Criminal Suits Filed	<u>0</u>	<u>0</u>
6) No. of Significant Violators (attach newspaper publication).	<u>3</u>	<u>0</u>
7) Amount of Penalties (not surcharges) Collected (total dollars/IUs assessed)	<u>0 / 0</u>	<u>0 / 0</u>
8) Other Actions (sewer bans, etc.).	<u>0</u>	<u>0</u>

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.

 Authorized Representative

Date _____

PPS Program Report

NPDES Tracking Permit No.

Permittee Name:

Second NPDES Permit No.

Date: 5/2/2013

Third NPDES Permit No.

Reviewing Engineer:

Report Type: Pretreatment Performance Summary Report

Report Information

Pretreatment Performance Summary Start 3/1/2012

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 Schedules:

Violation Notices Issued to SIUs:

Administrative Orders Issued to SIUs:

Civil Suits Filed Against SIUs:

Criminal Suits Filed Against SIUs:

Categorical Industrial Users (CIUs)

CIUs:

CIUs in SNC:

Penalties

Dollar Amount of Penalties Collected

Industrial Users (IUs) from which Penalties have been collected