

Yates, Adam

From: Yates, Adam
Sent: Friday, August 10, 2018 2:44 PM
To: 'Denise Bosnick'
Subject: RE: PPS-2018

Denise,

Thank you for your response and I appreciate your honesty. Unfortunately, this noncompliance event was still required to be reported on the QNCR. I am unsure as to whether this will trigger an enforcement action as that must be determined by the Enforcement Branch of the Office of Water Quality. For more information on that determination, the best person to contact would be Miles Johnson, Enforcement Coordinator at (501) 682-0631.

As for the next "Pretreatment Reporting Year," please ensure that all permitted SIUs (CIUs) are inspected at least once per year in accordance with the requirements at 40 CFR §403.8.

I look forward to seeing you at the conference next week! If you have any questions or concerns, please feel free to contact me.

Kindly,

Adam Yates
State Pretreatment Coordinator
Office of Water Quality
Arkansas Department of Environmental Quality
Phone: (501) 682-0617
Fax: (501) 682-0880

From: Denise Bosnick [<mailto:dbosnick@citywm.com>]
Sent: Friday, August 10, 2018 12:16 PM
To: Yates, Adam
Subject: RE: PPS-2018

Adam,

In response to your email of July 24, 2018. As the annual report indicated, I had not performed the inspections on my Categorical Industries. I do not have an excuse or a reason as to why this was not done. All but one inspection as been performed and the only reason for that was the facility manager was not in. I am attaching four reports.

Automated Conveyor Systems
Grace Trailer Services
Quala Services
Wastewater Solution.

The one that has not been done is Stateside Steel and Wire. That should be done next week but as you know EPA Region 6 conference is next week so I hope to have that one to you by the end of the month probably sooner.

Thanks,

Denise Bosnick
Director Environmental Quality

From: Yates, Adam <yates@adeq.state.ar.us>
Sent: Tuesday, July 24, 2018 1:13 PM
To: Denise Bosnick <dbosnick@citywm.com>
Cc: Blackmon, Amanda <Amanda.Blackmon@adeq.state.ar.us>; McWilliams, Carrie <mcwilliamsc2@adeq.state.ar.us>; Healey, Richard <HEALEYR@adeq.state.ar.us>; Ramsey, David <RAMSEY@adeq.state.ar.us>; Johnson, Miles <JohnsonM@adeq.state.ar.us>
Subject: RE: PPS-2018

Denise,

West Memphis Utility Commission's April 2018 Pretreatment Program Annual Report was received and reviewed.

Attachments A and C of the report indicate that none of the City's five (5) SIUs were inspected for the 2017 reporting year. Per the EPA Memorandum (1990) on "Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements" (link [here](#)), the City meets one (1) of the Level II Criteria: **failure to inspect at least 80% of the SIUs**. According to the Guidance Memo, this is considered to be Reportable Noncompliance (RNC) and should be reported on the Quarterly Noncompliance Report (QNCR).

If you believe the Annual Report has been misread or have comments or a rebuttal, please respond within 14 days from the date of this email.

Kindly,

Adam Yates
State Pretreatment Coordinator
Office of Water Quality
Arkansas Department of Environmental Quality
Phone: (501) 682-0617
Fax: (501) 682-0880

G:\Shared Folders\Water\Pretreatment\Reports

From: Denise Bosnick [<mailto:dbosnick@citywm.com>]
Sent: Thursday, April 19, 2018 9:47 AM
To: Yates, Adam
Subject: PPS-2018

Adam,

Attached is a copy of West Memphis Pretreatment Performance Summary. A hard copy was mailed to you on April 19, 2018 as well. If you have any questions please give me a call at (870) 70265141 or email me at dbosnick@citywm.com. Thanks so much.

Denise Bosnick
Director of Environmental Quality