

Torrence, Rufus

From: Torrence, Rufus
Sent: Thursday, April 09, 2009 12:39 PM
To: 'Denise Bosnick'
Cc: 'eq@ci.west-memphis.ar.us'
Subject: AFIN 18-00109 AR0022039 West Memphis 2008 Annual Report

Denise,

I have reviewed your annual report and it is complete and acceptable; however, I do have some recommendations:

1. Please analyze for Molybdenum.
2. Do not mix units on the influent/effluent chart; please show all analytical results in micrograms/liter (ug/l).
3. To avoid placing an industry in SNC for only one violation in a six month period, please sample all permitted industrial users (SIUs and NSIUs) on a monthly basis.

Let me know if you have concerns or questions.

Rufus, ADEQ

NPDES PERMIT FILE
NPDES # AR0022039
AFIN # 18-00109

Permit PN

Correspondence

Technical Backup
4/10/09 Date Scanned

Inf/Eff logged
ICIS coded
IUs checked
ANRT updated
RJP



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

AG
RT

April 1, 2009

6785

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

APR - 6 2009

5H

Dear Mr. Gilliam,

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) Analysis of the Influent, Effluent and Sludge,
- 4) Copy of the statement to be submitted to the largest newspaper in the municipality (Evening Times) for publication (April 1 – April 30, 2009) and;
- 5) The following statement: For this reporting period March 2008 - February 2009 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) violations.

Grace Trailer
615 Petro Cove
West Memphis, AR 72301

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

Nu-Way
220 Garrison
West Memphis, AR 72301

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

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

Sincerely,

A handwritten signature in cursive script that reads "Denise Bosnick".

Denise Bosnick
Director of Environmental Quality

Space, Rent	★	Marton, ... Attorney for Estate	1, 8
Im. Prop., Rent	★	The West Memphis Housing Authority accepting bids for its 2009 lawn service. Bid packets may be obtained by calling Janice Campbell with Ledford Engineering and Planning, LLC at 901-867-7800. There is no cost for a bid packet. The bids will be opened and read in public at 10:00 a.m., April 9, 2009 at the Senior Citizen's Community Center located at 430, 26th St. in West Memphis, Arkansas.	25, 1
Storage	★		
Mobile Homes For	★		
Mobile Home Lots	★		
ESTATE	★		
Resort Property,	★	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.	
Out of Town Prop.,	★		
Out of Town Prop.,	★		
Tracts/Acreage	★	For this reporting period March 2008- February 2009 there were three significant violators for this reporting period.	
Im. Prop., Sale	★	Automated Conveyors 3850 Southland Drive West Memphis, AR 72301	
Investment Prop.,	★	This was due to Chronic Violations and Technical Review Criteria (TRC) violations	
For Sale, Res.	★	Grace Trailer 615 Petro Cove West Memphis, AR 72301	
For Sale,	★	This was due to Chronic Violations and Technical Review Criteria (TRC) violations	
Tracts For sale	★	Nu-Way Products 220 Garrison West Memphis, AR 72301	
Homes For	★	This was due to Chronic violations and Technical Review Criteria (TRC) violations.	
		1, 2, 3, 6, 7, 8, 9, 10, 13, 14, 15, 16, 17, 20, 21, 22, 23, 24, 27, 28, 29, 30	

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MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2008 TO February 28, 2009
TREATMENT PLANT: City of West Memphis NPDES PERMIT #AR0022039
AVERAGE POTW FLOW: 4.6 MGD % IU FLOW: 15%

METALS, CYANIDE and PHENOLS	MAHC (Total) (µg/l) (2)	INFLUENT DATES SAMPLED <i>X</i>				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED <i>X</i>				LABORATORY ANALYSIS		
		Once/quarter					Once/quarter				EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		Date	Date	Date	Date		Date	Date	Date	Date			
Antimony	N/A	4/14/08 mg/L	8/4/08	10/28/08	2/17/09	N/A	4/14/08 mg/L	8/4/08	10/28/08	2/17/09	60	200.8	1.00
Cadmium	12.2	0	0.539	0.333	0.461	6510.0	0	0	0	0.200	0.5	200.8	0.150
Copper	517.0	0.0456	124	64.5	43.0	21200.0	0.0116	10.8	8.94	8.94	0.5	200.8	0.500
Lead	132.3	0	3.44	2.81	2.08	30630.0	0	0.779	0.693	0	0.5	200.8	0.500
Mercury	9.1	0	0.335 38.5 ng/L	0.1619 61.9 ng/L	2/20/09 31.4 ng/L	34.0	0	0.0031 3.1 ng/L	0.0031 3.1 ng/L	2/20/09 4.9 ng/L	0.005	1631E	0.5 ng/L
Nickel	96.1	0.0110	5.68	8.09	8.97	829050.0	0.00546	3.60	7.03	6.19	0.5	200.8	0.500
Selenium	19.2	0	0	0	3.05	10910.0	0	0	0	2.37	5	200.8	2.00
Silver	250.0	0	7.65	2.26	1.13	4260.0	0	0	0	0	0.5	200.8	0.500
Zinc	429.0	0.438	202	118	226	174030.0	0.142	107	114	87.0	20	200.8	5.00
Chromium	351.7	0.00765	3.56	2.68	1.70	1230840.0	0	1.03	1.58	0	10	200.8	1.00
Cyanide	100.0	0	0	0	0	12200.0	0	0	0	0	10	4500CNE	0.010 mg/L
Arsenic	16.0	0	2.58	1.85	8.74	361640.0	0	2.07	2.01	3.30	0.5	200.8	0.500
Molybdenum	14.4	0	0	0	0	N/A	0	0	0	0	--		
Phenols	N/A	0.144	0	0	0	N/A	0	0	0	0	5	420.1	0.005 mg/L
Beryllium	100.0	0	0	0	0	15200.0	0	0	0	0	0.5	200.8	0.500
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.500
Flow, MGD	N/A					N/A							
³⁾ Aluminum		0.713					0.345					200.7	0.100 mg/L
Iron		1.36					0.387					200.7	0.100 mg/L
Chloroform					1.19							624	1.00
1,4-Dichlorobenzene					2.40							624	

** Pencil in numbers should appear in database*

Ethylbenzene								4.54	(4)											624	1.00
Styrene								7.94	(4)											624	1.00
Toluene								5.34	(4)											624	5.00
Alpha-Terpineol								22.4	(4)											625	1.04
Bis(2-ethylhexyl)phthalate								351	(4)											625	104
Di-n-octyl phthalate								22.9	(4)											625	5.18
Phenol								8.07	(6)											625	5.18

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.**

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

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

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

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

(4) No Arkansas WAS for this parameter



WEST MEMPHIS UTILITY COMMISSION

P O Box 1868 604 East Cooper

West Memphis, AR 72303

Phone (870) 735-3355 Fax (870) 732-7623

Industrial Users For West Memphis, Arkansas

510 **Automated Conveyors Systems Inc.** ✓

3850 Southland Drive
West Memphis, AR 72301

Categorical Industry

North American Industry Classification System - 333922

Industrial Waste Discharge Permit Number - 02

Permit Issued – June 15, 2008 Expires – May 31, 2011

This industry only discharges into the city's wastewater system once or twice yearly to clean their equipment.

In a twelve month period there has been a total of 1 sampling visits made.

Compliance Status – SNC – 1 Oil & Grease violation.

NS-510 **ATM Oil**

435 Dacus Road
Marion, AR 72364

Non-Significant Non-Categorical Industry

Industrial Waste Discharge Permit Number - 26

Permit Issued - March 1, 2005 Expires - February 28, 2008 *see attached letter*

Samples are taken on a monthly basis for permit reporting. This industry is batch discharge only and must notify us before they discharge. There are no daily grab samples pulled.

In a twelve month period there has been a total of 103 sampling visits made.

Compliance Status – NC – 1 pH violation.



Department of Environmental Quality

NS-510

Coca-Cola Bottling Company
1400 Rainer Road
West Memphis, Arkansas 72301

Non-Significant Non-Categorical Industry
North American Industry Classification System - 312111
Industrial Waste Discharge Permit Number - 08
Permit Issued – June 15, 2008 Expires – May 31, 2011
Samples are taken twice a month for permit reporting, industry is checked daily and a grab sample is pulled when possible. ** When permit was renewed this was changed to once monthly. **
In a twelve month period there has been a total of 146 sampling visits made.
Compliance Status – NC – 9 pH violations and 1 Oil & Grease violation.

SLU/1010

Grace Trailer Service
615 Petro Cove
West Memphis, Arkansas 72301

Categorical Industry
North American Industry Classification System – 811192
Industrial Waste Discharge Permit Number - 24
Permit Issued – June 15, 2008 Expires – May 31, 2011
Samples are taken on a monthly basis for permit reporting this is done twice a month. The industry is checked daily and a grab sample is pulled when possible.
In a twelve month period there has been a total of 164 sampling visits made.
Compliance Status - SNC- 11 pH violations, 21 Oil and Grease, 12 TPH Oil and Grease and 3 Mercury violations.

NS-510

Langston Bag
1100 North 7th
West Memphis, Arkansas 72301

Non-Significant Non-Categorical Industry
North American Industry Classification System – 322224
Industrial Waste Discharge Permit Number - 10
Permit Issued – June 15, 2008 Expires – May 31, 2011
Samples are taken on a monthly basis for permit reporting, industry is checked daily and a grab sample is pulled when possible.
In a twelve month period there has been a total of 139 sampling visits made.
Compliance Status -NC- 3 Copper violations.



NS-SIU

Nu-Way Products

220 Garrison (213 Front)
West Memphis, Arkansas 72301

Non-Significant Non-Categorical Industry *OK*

North American Industry Classification System – 325612

Industrial Waste Discharge Permit Number - 11

Permit Issued – June 30, 2008 Expires – May 31, 2011

Samples are taken on a monthly basis for permit reporting. This industry is batch discharge only and must notify us before they discharge. There are no daily grab samples pulled.

In a twelve month period there has been a total of 4 sampling visits made.

Compliance Status – SNC – 1 Oil & Grease violation.

Stu/SIU

Stateside Steel and Wire, LLC

304 Wyanoke Road
West Memphis, AR 72301

Categorical Industry

North American Industry Classification System - 331222

Industrial Waste Discharge Permit Number - 25

Permit Issued – November 13, 2006 Expires – November 30, 2009

Samples are taken on a monthly basis for permit reporting, industry is checked daily and a grab sample is pulled when possible.

In a twelve month period there has been a total of 64 sampling visits made.

Compliance Status – NC – 2 pH violations, 2 Zinc violations.





WEST MEMPHIS UTILITY COMMISSION

PO Box 1868 604 East Cooper
Telephone (501) 735-3355 Fax (501) 732-7623
West Memphis, Arkansas 72301

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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 2008 February 2009
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs Three

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>3 / 3</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 / 3</u>	<u>1 / 4</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>3 / 7</u>	

III. Compliance Monitoring Program

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued/Total No. Required.	<u>3 / 3</u>	<u>3 / 4 0</u>
2) No. of Nonsampling Inspections Conducted.	<u>3 / 3</u>	<u>0 / 4</u>
3) No. of Sampling Visits Conducted.	<u>229</u>	<u>392</u>
4) No. of Facilities Inspected (nonsampling)	<u>3 / 3</u>	<u>0 / 4</u>
5) No. of Facilities Sampled	<u>3 / 3</u>	<u>4 / 4</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Compliance Schedules Issued/No. of Schedules Required	<u>0 / 0</u>	<u>0 / 0</u>
2) No. of Notices of Violations Issued to SIUs	<u>34</u>	<u>9</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>2</u>	<u>1</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.

Denise Bonnell
 Authorized Representative Date 4/1/09

PPS Program Report

* NPDES ID: AR00022039 Permittee's Name: West Memphis
 * Report Received/Event Date: 04/06/2009 Date: 04/08/2009

Report Type
 select a Program Report to apply

- Biosolids Program Report
- CAFO Annual Report
- CSO Event Report
- Local Limits Report
- MS4 Program Report
- Pretreatment Performance Summary Report
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

Report Information

* Pretreatment Performance Summary Start Date: 03/01/2008

Local Limits
 Date of Most Recent Technical Evaluation & or Local Limits: 03/20/2008
 Date of Most Recent Adoption of Technically Based Local Limits:
 Local Limit Pollutants:

Significant Industrial Users (SIUs)

SIUs: 3
 SIUs Without Control Mechanism: 0
 SIUs Not Inspected: 0
 SIUs Not Sampled: 0
 SIUs in SNC with Pretreatment Standards: 2
 SIUs in SNC with Reporting Requirements: 0
 SIUs in SNC with Pretreatment Schedule: 0
 SIUs in SNC Published in Newspaper: 2
 SIUs Schedules: 0
 Violation Notices Issued to SIUs: 34
 Administrative Orders Issued to SIUs: 0
 Civil Suits Filed Against SIUs: 0
 Criminal Suits Filed Against SIUs: 0

Removal Credits

Removal Credits Application Status: Not Applicable
 Date of Most Recent Removal Credits Approval:
 Removal Credits:

Categorical Industrial Users (CIUs)

CIUs: 3
 CIUs in SNC: 2

Acceptance of Waste

Acceptance of Hazardous Waste: No
 Acceptance of Non-Hazardous Industrial Waste: No
 Acceptance of Hauled Domestic Wastes: No

Penalties

Dollar Amount of Penalties Collected: \$ 0
 Industrial Users (IUs) from which Penalties have been collected: 0

Deficiencies

Deficiencies Identified During IU File Review: No
 Control Mechanism Deficiencies: No
 Legal Authority Deficiencies: No
 Deficiencies in Data Management and Public Participation: No
 Deficiencies in Interpretation and Application of Pretreatment Standards: No
 Inadequacy of Sampling and Inspections: No
 Adequacy of Pretreatment Resources: Yes

Other Information

SUO Reference: _____
 SUO Date: _____
 Annual Pretreatment Budget: \$ _____
 Pass-Through/Interference Indicator:
 Violation of IU Schedule for Remedial Measures: No
 Initial 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: _____