

Torrence, Rufus

From: Torrence, Rufus
Sent: Wednesday, April 20, 2011 1:03 PM
To: Denise Bosnick
Subject: AFIN 18-00109 AR0022039 City of West Memphis 2010 Annual Report



April 20, 2010

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

Re: City of West Memphis 2010 Annual Report
(Permit No. AR0022039, AFIN 18-00109)

Dear Ms. Bosnick:

The Department has reviewed the City's 2010 Annual Pretreatment Report and the report is complete. However, the Department noted that the City did not list the "Detected Level Achieved" on the monitoring chart. In addition, the City listed "zero" for all non-detects. Since the intent is to ensure that the detection level is low enough to verify compliance with water quality standards, the City must list the detection levels achieved.

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,

A handwritten signature in black ink that reads "Rufus Torrence". The signature is written in a cursive style.

Rufus Torrence, Pretreatment Engineer
Water Division

Inf/Eff logged
ICIS coded/Cover letter attached
IU's checked
ANRT 4/13/11

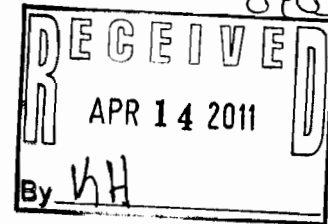


WEST MEMPHIS UTILITY COMMISSION
604 East Cooper PO Box 1868
West Memphis, Arkansas 72301
Phone (870) 735-3355 Fax (870) 732-7623

AFB30 RT

April 13, 2011

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



Re: 2010 Annual Report

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 of April and;
- 4) The following statement: For this reporting period March 2010 - February 2011 there were five significant violators for this reporting period.

ATM Oil

435 Dacus Road

Marion, AR 72364

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 Technical Review Criteria (TRC) violations.

Langston Bag
1100 North 7th
West Memphis, AR 72301

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

PSC Container (Quala Services)
400 Mound City Road
West Memphis, AR 72301

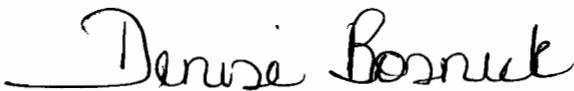
This was due to Technical Review Criteria (TRC) violations.

Stateside Steel
304 Wyanoke Road
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,



Denise Bosnick
Director of Environmental Quality

PAGE 8 TIMES, CRITTENDEN COUNTY, ARK., WEDNESDAY, APRIL 13, 2011

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 violations 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 2010- February 2011 there were five significant violations for this reporting period.

ATM Oil

435 Dacus Road
Marion, AR 72364

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 Technical Review Criteria (TRC) violations

Langston Bag

1100 North 7th
West Memphis, AR 72301

This was due to Technical Review Criteria (TRC) violations

PSC Container(Quala Services)

400 Mound City Road
West Memphis, AR 72301

This was due to Technical Review Criteria (TRC) violations

Stateside Steel

304 Wyanoke Road
West Memphis, AR 72301

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

2/12

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2010 TO February 28, 2011
TREATMENT PLANT: City of West Memphis NPDES PERMIT #AR0022039
AVERAGE POTW FLOW: 4.6 MGD % IU FLOW: 19%

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	Date	Date					
Antimony	N/A	5/25/2010	8/24/2010	11/18/2010	3/8/2011	5/24/2010	8/24/2010	11/18/2010	3/8/2011	5/24/2010	8/24/2010	11/18/2010	3/8/2011	1.00	EPA-200.8		
Cadmium	12.2	0.200	0.348	0.205	0.225	0	0	0.205	0.225	0	0	0.120	0	0.100	EPA-200.8		
Copper	517.0	55.0	66.5	73.0	43.0	66.5	8.44	6.75	6.52	3.84	8.44	6.75	6.52	0.500	EPA-200.8		
Lead	132.3	1.97	2.64	2.36	1.36	2.64	0	0.549	0	2.64	0.549	0.746	0	0.500	EPA-200.8		
Mercury	9.1ng/L	9.57ng/L	10.7ng/L	45.9ng/L	8.03ng/L	10.7ng/L	2.43ng/L	1.09ng/L	1.93ng/L	2.43ng/L	2.15ng/L	1.09ng/L	1.93ng/L	.005ng/L	EPA-1631E		
Nickel	96.1	4.49	3.31	4.18	3.73	3.31	3.26	2.07	2.95	3.26	2.07	3.41	2.95	0.500	EPA-200.8		
Selenium	19.2	0	0	0	2.36	0	0	0	0	0	0	0	0	2.00	EPA-200.8		
Silver	250.0	0.204	1.76	1.09	0.312	1.76	0	0.113	0	0	0.113	0	0	0.100	EPA-200.8		
Zinc	429.0	122	174	147	74.2	174	105	114	50.7	105	114	119	50.7	5.00	EPA-200.8		
Chromium	351.7	4.66	6.35	6.98	3.30	6.35	1.99	3.29	1.52	1.99	3.29	3.27	1.52	1.00	EPA-200.8		
Cyanide	100.0	0	0	0	0	0	0	0	0	0	0	0	0	0.010	SM-4500CNE		
Arsenic	16.0	2.82	1.68	2.11	1.59	1.68	3.76	1.46	1.88	3.76	1.46	3.08	1.88	0.500	EPA-200.8		
Molybdenum	14.4													--			
Phenols	N/A	0.008	0	0.005	0	0	0	0	0	0	0	0	0	0.005	EPA-420.1(Low Level)		
Beryllium	100.0	0	0	0	0	0	0	0	0	0	0	0	0	0.500	EPA-200.8		
Thallium	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0.500	EPA-200.8		
Flow, MGD	N/A																
⁽¹⁾ Phosphorus														.00625	SM-4500-PE		
Ammonia Nitrogen		5.02	12.8	6.80	0	5.02	0.347	2.27	0	5.02	0.347	2.27	0	.0050	SM-4500-NH3D		
Organic N		6.80	19.6	19.6	0	6.80	0	0	1.00	6.80	0	0	1.00	1.00	CALCULATION		
Total Kjeldahl Nitrogen		19.6	19.6	19.6	0	19.6	2.03	2.03	0.500	19.6	2.03	2.03	0	0.500	SM-4500-NH3D-T		
Nitrate+Nitrite-N									3.00					3.00	SM-4500-NO3E		
Benzene					0				1.00					1.00	624		
Chloroform					1.60				1.00					1.00	624		

3/12

1,4-Dichlorobenzene											0	1.00	624
Ethylbenzene						6.01					0	1.00	624
Styrene						1.35					0	1.00	624
Toluene						0					0	5.00	624
Alpha-Terpineol						0					0	1.02	625
Bis(2-ethylhexyl)phthalate						327					148	102	625
Phenol						0					0	5.10	625
Heptachlor						0					0.02014B	0.00400	L101735

(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.

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

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

4/12

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	433	Y	6/15/2008	N		2		N/A	N/A	N/A	Compliant	
ATM Oil	562219		Y	3/1/2005	N		110		N/A	N/A	N/A	SNC/O&G	
Coca-Cola Bottling	312111		Y	6/15/2008	N		86		N/A	N/A	N/A	NC/pH & O&G	
Grace Trailer	811192	442	Y	6/15/2008	N		113		N/A	N/A	N/A	SNC/pH, O&G, THP O&G, Copper & Mercury	
Langston Bag	322224		Y	6/15/2008	N		86		N/A	N/A	N/A	SNC/O&G & Copper	
Nu-Way	325612		Y	6/30/2008	N		3		N/A	N/A	N/A	Compliant	
PSC Container (Quala Services)	811192	442	Y	8/10/2009	N		60		N/A	N/A	N/A	SNC/pH, O&G, Copper & Mercury	
Stateside Steel	331222	433	Y	3/24/2010	N		108		N/A	N/A	N/A	SNC/pH, Chromium, Zinc & O&G	



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

Automated Conveyors Systems Inc.

3850 Southland Drive

West Memphis, AR 72301

SIU

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 2 sampling visits made.

Compliance Status – Compliant – no violations.

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 *industry is discharging under expired permit until an agreement can be made on where to discharge permanently *

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 110 sampling visits made.

Compliance Status – SNC – 3 Oil & Grease violations.



Department of Environmental Quality

6/12

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 once a month 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 86 sampling visits made.
Compliance Status – NC – 4 pH violations and 4 Oil & Grease violations.

Grace Trailer Service
615 Petro Cove
West Memphis, Arkansas 72301

SIV 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 113 sampling visits made.
Compliance Status - SNC- 7 pH violations, 3 Copper violations, 3 Mercury violations, 13 Oil and Grease violations and 3 TPH Oil and Grease violations.

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 86 sampling visits made.
Compliance Status -SNC- 3 Copper violations and 1 Oil & Grease violation.



Nu-Way Products

220 Garrison (213 Front)
West Memphis, Arkansas 72301

- ✓ Non-Significant Non-Categorical Industry
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 3 sampling visits made.
Compliance Status – Compliant - no violations.

PSC Conatiner (Quala Services)

400 Mound City Road
West Memphis, AR 72301

- S/U Categorical Industry
North American Industry Classification System – 811192
Industrial Waste Discharge Permit Number - 24
Permit Issued – August 10, 2009 Expires – July 31, 2012
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 60 sampling visits made.
Compliance Status - SNC- 4 pH violations, 1 Copper violation, 1 Mercury violation, and 11 Oil & Grease violations.

Stateside Steel and Wire, LLC

304 Wyanoke Road
West Memphis, AR 72301

- S/U Categorical Industry
North American Industry Classification System - 331222
Industrial Waste Discharge Permit Nurnber - 25
Permit Issued – March 24, 2010 Expires – February 28, 2013
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 108 sampling visits made.
Compliance Status – SNC – 2 pH violations, 4 Chromium violations, 10 Zinc violations and 4 Oil & Grease violation.



ATTACHMENT B
SIGNIFICANT VIOLATIONS - ENFORCEMENT ACTIONS TAKEN

Industrial User Name	Nature of Violation		Number of Action Taken					Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other		Date Issued	Date Due		
ATM Oil		X	0	0	0	0	0	0.00	N/A	N/A	SNC	They are in SNC because they are a Chronic and TRC violator for O&G.
Grace Trailer		X	24	0	0	0	0	0.00	N/A	N/A	SNC	They are in SNC because they are a TRC violator for O&G.
Langston Bag		X	3	0	0	0	0	0.00	N/A	N/A	SNC	They are in SNC because they are a TRC violator for Copper.
PSC Container (Quala Services)		X	11	0	0	0	0	0.00	N/A	N/A	SNC	They are in SNC because they are a TRC violator for O&G.
Stateside Steel		X	5	0	0	0	0	0.00	N/A	N/A	SNC	They are in SNC because they are a Chronic and TRC violator for Zinc.



WEST MEMPHIS UTILITY COMMISSION

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

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 2010 - February 2011 there were five significant violators for this reporting period.

ATM Oil

**435 Dacus Road
Marion, AR 72364**

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 Technical Review Criteria (TRC) violations.

Langston Bag

**1100 North 7th
West Memphis, AR 72301**

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

PSC Container (Quala Services)

**400 Mound City Road
West Memphis, AR 72301**

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

Stateside Steel

**304 Wyanoke Road
West Memphis, AR 72301**

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

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 2010 February 2011
(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>3 / 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>3 / 4</u>	<u>2 / 4</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)		<u>5 / 8</u>

7/12

III. Compliance Monitoring Program

	<u>SIGNIFICANT CATEGORICAL</u>	<u>INDUSTRIAL USERS NonCategorical</u>
1) No. of Control Documents Issued/Total No. Required.	<u>4 / 4</u>	<u>0 / 0</u>
2) No. of Nonsampling Inspections Conducted.	<u>3 / 4</u> *	<u>0 / 0</u>
3) No. of Sampling Visits Conducted.	<u>283</u>	<u>0</u>
4) No. of Facilities Inspected (nonsampling)	<u>3 / 4</u> *	<u>0 / 0</u>
5) No. of Facilities Sampled	<u>4 / 4</u>	<u>0 / 0</u>

IV. Enforcement Actions

	<u>SIGNIFICANT CATEGORICAL</u>	<u>INDUSTRIAL USERS 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>40</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.

Dennis Prosser
Authorized Representative

Date 4/13/11

→ City appears to have inadvertently listed "3/4" instead of 44 for "inspections".

PPS Program Report

* NPDES ID: AR0022039 Permittee's Name West Memphis
 * Report Received/Event Date: 04/14/2011 Date 4-18-2011

Report Type

- 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: 03/01/2010

Significant Industrial Users (SIUs)

SIUs: 4
 SIUs Without Control Mechanism: 0
 SIUs Not Inspected: 0
 SIUs Not Sampled: 0
 SIUs in SNC with Pretreatment Standards: 3
 SIUs in SNC with Reporting Requirements: 0
 SIUs in SNC with Pretreatment Schedule: 0
 SIUs in SNC Published in Newspaper: 3
 SIUs Schedules: 0
 Violation Notices Issued to SIUs: 40
 Administrative Orders Issued to SIUs: 0
 Civil Suits Filed Against SIUs: 0
 Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

CIUs: 4
 CIUs in SNC: 3

Penalties

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

Other Information

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

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits: _____
 Date of Most Recent Adoption of Technically Based Local Limits: _____
 Local Limit Pollutants: _____

Removal Credits

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

Acceptance of Waste

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

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

Annual Frequency

Annual Frequency of Influent Toxicant Sampling: _____
 Annual Frequency of Effluent Toxicant Sampling: _____
 Annual Frequency of Sludge Toxicant Sampling: _____