

## Henderson, Katie

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**From:** Torrence, Rufus  
**Sent:** Tuesday, April 24, 2012 1:32 PM  
**To:** Denise Bosnick  
**Cc:** Henderson, Katie  
**Subject:** AFIN 18-00109 AR0022039 City of West Memphis 2010 Annual Report  
**Attachments:** WMPS MQLs.pdf; WMPS 2011 Annual Report.pdf



April 24, 2012

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

Re: City of West Memphis 2011 Annual Report  
(Permit No. AR0022039, AFIN 18-00109)

Dear Ms. Bosnick:

The Department has reviewed the City's 2011 Annual Pretreatment Report and the report is complete. However, the Department noted that the City did not list the "Detected Level Achieved" on the influent-effluent chart. The City may list "zero" for all non-detects if the Detected Level Achieved is shown. 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 (Minimum Quantification Levels-MQLs achieved by the lab).

The City amended the report by submitting a copy of Environmental Testing & Consulting (ETC) lab report dated 3/13/2012. The Department reviewed the ETC report and added to the chart the Detection Levels achieved by ETC. In the future the City must enter the actual MQLs achieved by the lab in the last column ("Detection Level Achieved") on the chart. Referring to page 5 of 28 in the ETC report (column labeled "MQL"), find the achieved level (0.01 mg/l) for cyanide. Refer to pages 8 of 28 and 23 of 28 for the metal MQLs (note that the MQL for Mercury is listed in the "Method Reporting Limit"

row). EPA requires labs to achieve the levels listed in the “EPA MQL” column on the chart. The ETC MQLs (Detection Level Achieved) match the required EPA MQLs.

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

Sincerely,



Rufus Torrence, Pretreatment Engineer  
Water Division

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**9801 NORTHSIDE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-9317 / TELEPHONE 501-682-0744 / FAX 501-687-0800**  
**[www.adeq.state.ar.us](http://www.adeq.state.ar.us)**



05259

West Memphis Utilities- Industries  
Ms. Denise Bosnick  
PO Box 1868  
West Memphis , AR 72301

Project Wastewater Treatment Plant  
Information : Influent/Effluent

Report Date : 3/13/2012

Report Number : **12-059-0220**

### REPORT OF ANALYSIS

Received : 2/28/2012

Lab No : **91063**

Matrix: **Aqueous**

Sample ID : **Influent Grab**

Sampled: **2/28/2012 9:45**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Cyanide	<0.010	mg/L	0.010	1	03/01/12 09:00	NRT	4500-CN-E
Oil and Grease	<b>15.7</b>	mg/L	1.4	1	02/29/12 14:25	EBG	1664A
Phenols (Total)	<0.0050	mg/L	0.0050	1	03/02/12 07:35	DRG	420.1

**Analytical Method:** 624

**Prep Method:** EPA-624 (PREP)

**Prep Batch(es):** L125674

**Date/Time Prepped:** 3/1/2012 09:52:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Acrolein	<20.0	µg/L	20.0	1	03/01/12 19:05	NFP	L125675
Acrylonitrile	<20.0	µg/L	20.0	1	03/01/12 19:05	NFP	L125675
Benzene	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
Bromodichloromethane	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
Bromoform	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
Bromomethane	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
Carbon Tetrachloride	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
Chlorobenzene	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
Chlorodibromomethane	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
Chloroethane	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
2-Chloroethylvinyl Ether	<5.00	µg/L	5.00	1	03/01/12 19:05	NFP	L125675
Chloroform	<b>3.07</b>	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
Chloromethane	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
1,2-Dichlorobenzene	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
1,3-Dichlorobenzene	<1.00	µg/L	1.00	1	03/01/12 19:05	NFP	L125675
1,4-Dichlorobenzene	<b>1.57</b>	µg/L	1.00	1	03/01/12 19:05	NFP	L125675

#### Qualifiers/ Definitions

*	Outside QC limit	DF	Dilution Factor
I	Recovery out of range	MQL	Method Quantitation Limit
Q	RPD >40% dual column results		

05259

West Memphis Utilities- Industries  
Ms. Denise Bosnick  
PO Box 1868  
West Memphis , AR 72301

Project Wastewater Treatment Plant  
Information : Influent/Effluent

Report Date : 3/13/2012

Report Number : **12-059-0220**

**REPORT OF ANALYSIS**

Received : 2/28/2012

Lab No : **91064**

Matrix: **Aqueous**

Sample ID : **Influent 2/27-28/12**

Sampled: **2/28/2012 9:45**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Biochemical Oxygen Demand (5-day)	<b>182</b>	mg/L	60	1	02/28/12 12:00	TKM	5210-BOD
COD (Chemical Oxygen Demand)	<b>470</b>	mg/L	150	1	03/01/12 08:45	TKM	5220-D
Nitrate+Nitrite-N	<0.100	mg/L	0.100	1	03/08/12 13:45	NRT	4500-NO3E
pH	<b>7.0</b>	s.u.		1	02/28/12 13:00	JDW	4500-H-B
Total Suspended Solids	<b>132</b>	mg/L	6	1	02/28/12 14:22	KAT	2540D
Total Phosphorus	<b>5.19</b>	mg/L	0.625	1	02/29/12 08:30	TKM	4500-PE
Total Antimony	<1.00	µg/L	1.00	1	02/29/12 16:25	RQE	EPA-200.8
Total Arsenic	<b>4.13</b>	µg/L	0.500	1	02/29/12 16:25	RQE	EPA-200.8
Total Beryllium	<0.500	µg/L	0.500	1	02/29/12 16:25	RQE	EPA-200.8
Total Cadmium	<b>0.959</b>	µg/L	0.100	1	02/29/12 16:25	RQE	EPA-200.8
Total Chromium	<b>4.27</b>	µg/L	1.00	1	02/29/12 16:25	RQE	EPA-200.8
Total Copper	<b>64.9</b>	µg/L	0.500	1	02/29/12 16:25	RQE	EPA-200.8
Total Lead	<b>3.04</b>	µg/L	0.500	1	02/29/12 16:25	RQE	EPA-200.8
Total Nickel	<b>6.22</b>	µg/L	0.500	1	02/29/12 16:25	RQE	EPA-200.8
Total Selenium	<b>4.88</b>	µg/L	2.00	1	02/29/12 16:25	RQE	EPA-200.8
Total Silver	<b>0.244</b>	µg/L	0.100	1	02/29/12 16:25	RQE	EPA-200.8
Total Thallium	<0.500	µg/L	0.500	1	02/29/12 16:25	RQE	EPA-200.8
Total Zinc	<b>107</b>	µg/L	5.00	1	02/29/12 16:25	RQE	EPA-200.8

**Analytical Method:** 608

**Prep Method:** EPA-608 (PREP FV1)

**Prep Batch(es):** L125948

**Date/Time Prepped:** 3/6/2012 15:00:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Aldrin	<0.00400	µg/L	0.00400	1	03/07/12 22:50	VIC	L126143

**Qualifiers/ Definitions**

*	Outside QC limit	DF	Dilution Factor
I	Recovery out of range	MQL	Method Quantitation Limit
Q	RPD >40% dual column results		

# Mercury One LTD

Florida

New York

Louisiana

Mercury Analysis

NELAP Cert # E871043

NELAP Cert # 11976

NELAP Cert # 04150

## Analytical Report

Report #: 12-0471

EPA Method 1631E & 245.7 Rev 2

Page 1 of 1

Customer Name:

Environmental Testing & Consulting 3/1/12  
2790 Whitten Rd.  
Memphis, TN 38133-4753

Attention:

R Ross/ R Thomas

Project/PO#

12-059-0220

Lab /(Field ID) or (Customer ID)	Results ng/L	Results ng/L	Results ng/L	Results ng/L	Mercury One ID:
L 91067 (STP Influent Grab)	15.0				120229-18
L 91068 (STP Effluent Grab)		4.28			120229-19
L 91069 (Field Blank)			<0.5		120229-20
Sample Type	Influent	Effluent	Field Blank		
Date Sampled:	2/28/12	2/28/12	2/28/12		
Date Received:	2/29/12	2/29/12	2/29/12		
Date Prepared:	2/29/12	2/29/12	2/29/12	2/29/12	
Date Analyzed:	3/1/12	3/1/12	3/1/12		
Time Analyzed:	9:14:17 AM	9:15:52 AM	9:23:40 AM		
Method Qualifier	M 1	M 1	M 1	M 1	
Dilution Factor	10				<b>QCS</b>
Method Blank	1631E <0.2ng/L	245.7 Rev 2 <1.8 ng/L			<b>Acceptable Range</b>
Method Reporting Limit	1631E 0.5ng/L	245.7 Rev 2 5.0 ng/L			245.7 Rev 2 63-111%
Quality Control Sample (QCS)	6.15	102.5%	-	-	1631E 71-129%

**M= Modified: See Below for Explanation**

**M1= Method 1631E used for analysis.**

**M2= Method 245.7 used for analysis.**

The Matrix Spike and Matrix Spike Duplicate reported are for samples identified below

Mercury One ID

% Recovery

120229-19

MS/MSD Acceptable Range	RPD
1631E 71-129%	< 20%
245.7 Rev 2 63-111%	< 18%

MS	MSD	RPD
101.6%	99.6%	1.7%

Comments:

The results are related only to the samples presented on this report.

The test results are certified to meet all requirements of NELAC.

Other Codes

Other Comments: J = Estimated result , R = Rejected,

Reason for J or R flag:

\* A value found between the Reporting Limit and the Method Detection Limit is considered estimated

William W. Purves

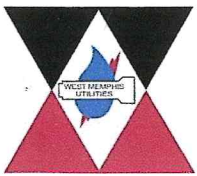
Rev 4 6/23/11

Phone: 330-963-0843

2241 Pinnacle Parkway, Suite B, Twinsburg, OH 44087

Fax: 330-963-1016

B1200



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

April 12, 2012

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 2011 - February 2012 there were three significant violators for this reporting period.

Grace Trailer  
615 Petro Cove  
West Memphis, AR 72301

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

- ① Inf/eff logged
- ② ICIS coded
- ③ IU's checked
- ④ Annual Report Chart

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,

A handwritten signature in purple ink that reads "Denise Bosnick". The signature is written in a cursive, flowing style.

Denise Bosnick  
Director of Environmental Quality

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 2011- February 2012 there were five significant violators for this reporting period.

Grace Trailer  
615 Petro Cove  
West Memphis, AR 72301  
This was due to Technical Review Criteria (TRC) violations

Quala Services  
400 Mound City Road  
West Memphis, AR 72301  
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  
17, 18, 19, 20, 23,  
24, 25, 26, 27, 30



**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: March 1, 2011 TO February 28, 2012**  
**TREATMENT PLANT: City of West Memphis NPDES PERMIT #AR0022039**  
**AVERAGE POTW FLOW: 4.6 MGD % IU FLOW: 17%**

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	Date	Date	Date	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		6/16/2011	9/28/2011	12/19/2011	2/28/2012		6/16/2011	9/28/2011	12/19/2011	2/28/2012			
Antimony	N/A	<1.00	<1.00	<1.00	<1.00	N/A	<1.00	<1.00	<1.00	<1.00	1.00	EPA-200.8	1.00
Cadmium	12.2	0.461	0.374	0.269	0.959	6510.0	<0.100	<0.100	0.198	<0.100	0.100	EPA-200.8	0.100
Copper	517.0	66.8	61.9	35.1	64.9	21200.0	11.3	3.15	31.1	10.0	0.500	EPA-200.8	0.500
Lead	132.3	5.24	3.24	2.56	3.04	30630.0	1.13	<0.500	2.32	0.718	0.500	EPA-200.8	0.500
Mercury	9.1ng/L	17.1ng/L	61.2ng/L	10.0ng/L	15.0ng/L	34.0ng/L	7.73ng/L	3.53ng/L	2.04ng/L	4.28ng/L	0.5ng/L	EPA-1631E	0.5ng/L
Nickel	96.1	8.38	5.40	6.33	6.22	829050.0	3.66	3.64	6.15	4.22	0.500	EPA-200.8	0.500
Selenium	19.2	<2.00	<2.00	<2.00	4.88	10910.0	<2.00	<2.00	2.19	<2.00	2.00	EPA-200.8	2.00
Silver	250.0	0.674	0.762	0.830	0.244	4260.0	<0.100	<0.100	0.241	<0.100	0.100	EPA-200.8	0.100
Zinc	429.0	193	190	101	107	174030.0	46.7	79.8	80.4	54.4	5.00	EPA-200.8	5.00
Chromium	351.7	7.45	4.47	2.22	4.27	1230840.0	<1.00	<1.00	1.77	2.44	1.00	EPA-200.8	1.00
Cyanide	100.0	<0.010mg/L	<0.010mg/L	<0.010mg/L	<0.010mg/L	12200.0	<0.010mg/L	<0.010mg/L	<0.010mg/L	<0.010mg/L	0.010mg/L	SM-4500-CN-E	0.010mg/L
Arsenic	16.0	6.56	1.66	3.62	4.13	361640.0	3.83	1.93	3.58	6.27	0.500	EPA-200.8	0.500
Molybdenum	14.4					N/A					--		
Phenols	N/A	0.118mg/L	0.262mg/L	<0.005mg/L	<0.005mg/L	N/A	<0.005mg/L	<0.005mg/L	<0.005mg/L	<0.005mg/L	0.005mg/L	EPA-420.1(Low Level)	
Beryllium	100.0	<0.500	<0.500	<0.500	<0.500	15200.0	<0.500	<0.500	<1.500	<0.500	0.500	EPA-200.8	0.500
Thallium	N/A	<0.500	<0.500	<0.500	<0.500	N/A	<0.500	<0.500	<0.500	<0.500	0.500	EPA-200.8	0.500
Flow, MGD	N/A					N/A							
(3)phosphorus				3.16mg/L	5.19 mg/L				3.66mg/L	2.07mg/L	0.0025mg/L	SM-4500-PE	
Dieldrin				0.00666Q	0.00666Q					<0.00400	0.00400	608	
Endosulfan II				0.00857	0.00857					<0.00400	0.00400	608	
Heptachlor				0.08497Q	0.08497Q					<0.00400	0.00400	608	
Bis(2-ethylhexyl)phthalate				713	713					114	40.0	625	
Phenol				89.8	89.8					<5.10	5.10	625	
Chloroform				3.07	3.07					<1.00	1.00	624	



**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	90-day Compliance	Semi Annual	Self Monitoring	
Automated Conveyors <i>**Only discharge to the city Sewer when they clean their equipment</i>	333922		Y	6/1/2011	N	1	1	Y	N/A	N/A	N/A	C
ATM Oil	562219		Y	3/1/2005	N	0	68	N/A	N/A	N/A	N/A	C
Coca-Cola Bottling	312111		Y	6/1/2011	N	0	99	N/A	N/A	N/A	N/A	NC
Grace Trailer	811192		Y	6/1/2011	N	1	144	Y	N/A	N/A	N/A	SNC
Langston Bag	322224		Y	6/1/2011	N	0	91	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	C
Quata Services	811192		Y	6/1/2011	N	1	71	Y	N/A	N/A	N/A	SNC
Stateside Steel	331222		Y	3/24/2010	N	1	124	Y	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 2011 February 2012  
(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>3 / 4</u>	<u>0 / 0</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .		<u>3 / 4</u>

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>4 / 4</u>	<u>0 / 0</u>
3) No. of Sampling Visits Conducted. . . . .	<u>340</u>	<u>0</u>
4) No. of Facilities Inspected (nonsampling) .	<u>4 / 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>19</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.

Denise Borrick  
Authorized Representative

Date 4/16/12

Report Type

Select a Program Report to add

- 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: 03/01/2011

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: 19
- 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:

Adherence of IU Schedule for Remedial Measures: No

Local 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: [ ]