

Jamie Belcourt (adpce.ad)

From: Jamie Belcourt (adpce.ad)
Sent: Tuesday, June 20, 2023 3:49 PM
To: Denise Bosnick (dbosnick@westmemphisar.gov)
Cc: Stacie Wassell (adpce.ad); Richard Healey (adpce.ad); Bryan Leamons (adpce.ad); Zachary Carroll (adpce.ad); Jason Bolenbaugh (adpce.ad)
Subject: City of West Memphis - AR0022039 - 2022 Annual Pretreatment Report
Importance: High

Ms. Bosnick,

West Memphis Wastewater Treatment Facility's (West Memphis) March 1, 2022 – February 28, 2023 Pretreatment Program Annual Report (NPDES Permit AR002203) was received, reviewed, and deemed complete according to the reporting requirements of 40 C.F.R. § 403.12(i).

During review of the Annual Report it was noted in the monitoring results section that the maximum allowable headworks concentration (MAHC) for cadmium and selenium was exceeded for one (1) quarter during the reporting year. Additionally, the MAHC for copper, lead, nickel, zinc, chromium, arsenic, and molybdenum was exceeded for all four (4) quarters during the reporting year. DEQ requests that West Memphis address the exceedances of the MAHC for all of the above-noted parameters by investigating the cause of the high loading, identifying any noncomplying industries, and increasing monitoring of its industrial users (IUs). Please provide a response within sixty (60) calendar days of the date of this email detailing West Memphis's investigation into the cause of the MAHC exceedances including documentation of any IU not in compliance.

In addition, the Annual Report indicated that mercury was not analyzed during three (3) quarters of the reporting year. This is a violation of NPDES Permit AR0022039 Part II Condition 7.C, which states that the permittee shall analyze the treatment facility influent and effluent for the presence of the toxic pollutants listed in 40 C.F.R. Part 122 Appendix D (NPDES Application Testing Requirements) Table II at least once per year and the toxic pollutants in Table III at least four (4) times per year (quarterly).

Furthermore, the Annual Report indicated that required inspections were not conducted for five (5) of West Memphis's Significant Industrial Users (SIUs). On June 5, 2023, DEQ received an email from you stating that these inspections were not conducted for the 2022–2023 reporting year. This is a violation of NPDES Permit AR0022039 Part II Condition 7.A.2, which states that the permittee must inspect and sample the effluent from each Significant Industrial User in accordance with 40 C.F.R. § 403.8(f)(2)(v). This is in addition to any industrial self-monitoring activities.

Please reply to this email to let me know that you have received it.

If you have any questions or concerns, or if I can be of any assistance, please do not hesitate to reach out.

Thank you,

Jamie Belcourt | Pretreatment Coordinator

Division of Environmental Quality | Office of Water Quality
Policy & Administration

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0858 | c: 501.287.8714 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2022 TO February 28, 2023
TREATMENT PLANT: City of West Memphis NPDES PERMIT #AR0022039
AVERAGE POTW FLOW: 4.6 MGD % IU FLOW: 8%

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)
		9/20/22	12/20/22	3/1/23	3/14/23		9/21/22	12/21/22	3/1/22	3/14/23			
Antimony	N/A	1.05	<1.00	<1.00	<1.00	N/A	<1.00	<1.00	<1.00	<1.00	60	EPA-200.8	1.00
Cadmium	0.100	0.216	<0.100	-0.100	<0.100	6510.0	<0.100	0.228	<0.100	<0.100	0.5	EPA-200.8	0.100
Copper	0.500	57.8	27.8	34.5	31.7	21200.0	4.84	24.9	3.97	5.35	0.5	EPA-200.8	0.500
Lead	0.500	2.52	1.49	1.40	1.24	30630.0	<0.500	1.23	<0.500	<0.500	0.5	EPA-200.8	0.500
Mercury	0.00020				<0.00020	0.034				<0.000200	0.005	EPA-245.1	0.00020
Nickel	0.500	7.46	4.44	3.69	3.35	829050.0	2.54	4.18	2.09	2.45	0.5	EPA-200.8	0.500
Selenium	1.00	<1.00	1.67	<1.00	<1.00	10910.0	<1.00	2.16	<1.00	<1.00	5	EPA-200.8	1.00
Silver	0.100	-0.100	-0.100	-0.100	-0.100	4260.0	-0.100	-0.100	-0.100	-0.100	0.5	EPA-200.8	0.100
Zinc	10.0	167	81.2	74	96.1	174030.0	60.4	51.7	42.5	43.0	20	EPA-200.8	10.0
Chromium	1.00	6.05	2.33	1.75	1.07	123084.0	-1.00	2.01	-1.00	-1.00	10	EPA-200.8	1.00
Cyanide	0.005	<0.005	<0.005	<0.005	<0.005	12200.0	<0.005	<0.005	<0.005	<0.005	10	4500CNE-2016	0.005
Arsenic	0.500	1.02	3.27	2.29	2.30	361640.0	0.948	5.01	5.26	2.88	0.5	EPA-200.8	0.500
Molybdenum	1.00	3.20	3.92	3.08	1.95	N/A	3.40	3.73	5.30	1.57	--	EPA-200.8	1.00
Phenols	N/A	0.0232	0.0169	0.112	0.0121	N/A	<0.0050	<0.0050	<0.0050	<0.0050	5	420.1	0.0050
Beryllium	0.500	<0.500	<0.500	<0.500	<0.500	15200.0	<0.500	<0.500	<0.500	<0.500	0.5	EPA-200.8	0.500
Thallium	N/A	<0.200	<0.200	<0.200	<0.200	N/A	<0.200	<0.200	<0.200	<0.200	0.5	EPA-200.8	0.200
Flow, MGD	N/A					N/A							
(3)													
1,4 Dichlorobenzene					1.25							624.1	1.00
Ethylbenzene					2.40							624.1	1.00

Toluene					5.55							624.1	5.00
Diesel Range Organics					4570							80158-DRO	900
Oil Range Organics					3330							80158-DRO	900
Surfactants					2.91							5540C-2011	0.400
Aluminum					255							EPA-200.8	100
Barium					63.6					32.8		EPA-200.8	1.00
Boron					187					186		EPA-200.8	25.0
Cobalt					1.20							EPA-200.8	1.00
Iron					964					174		EPA-200.8	100
Magnesium					4590					4120		EPA-200.8	100
Manganese					176					21.9		EPA-200.8	1.00
Tin					8.59					10.8		EPA-200.8	5.00
Titanium					19.0					16.4		EPA-200.8	1.00
4,4'DDT					0.01510							EPA-608.3	0.00400
Dieldrin					0.01080					0.00630		EPA-608.3	0.00400
Phosphorus					2.54					0.533		365.4	2.50
Nitrate-Nitrite-N												4500N03F-2016	0.100
											2.93		

(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.

Quala Services Out of Business at this location	7699/ 811192	40 CFR 442.15	Y	6/1/ 2020 To 5/31 2023	N		28	C	C	NA	NA	SNC 12-Oil and Grease 1-TPH Oil and Grease
Wastewater Solution	4212/ 562211	40 CFR 437.47	Y	6/1/ 2020 To 5/31/ 2023	N		25			NA	NA	C

City does all testing so there are no semi-annual report or self-monitoring report
Automated Conveyor System and Master Halco are Zero Dischargers.

ATTACHMENT A-2
PRETREATMENT PROGRAM STATUS REPORT
UPDATED NON-SIGNIFICANT (yet permitted) INDUSTRIAL USERS LIST

Industrial User Name	SIC/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				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	
Coca-Cola Consolidated	2086/312111	N/A	Y	6/1/2020-5/31/2023	N	0	253	N/A	N/A	N/A	N/A	NC-13 pH
Langston Bag	2674/322224	N/A	Y	6/1/2020-5/31/2023	N	0	80	N/A	N/A	N/A	N/A	C
Nu-Way-Out of Business	2842/325612	N/A	Y	6/1/2017-5/31/2020	N	0	0	N/A	N/A	N/A	N/A	C
Warren Oil	2992 / 324191	N/A	Y	6/1/2020 - 5/31/2023	N	0	83	N/A	N/A	N/A	N/A	C

- *All the above industries are Non-Categorical so no CFR category, no BMR is required, no 90-day compliance was issued, city does all testing so no semiannual or self-monitoring.
- Coca-Cola Consolidated will be updated to a Significant Industrial User in new permit.

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 Environmental Quality

Contact Telephone 870-702-5141 **NPDES Permit Nos.** AR002203

Reporting Period March 1, 2022 February 28,
2023

(Beginning Month, day and Year) (Ending Month, day and Year)

Total Number of Categorical IUs Five

Total Number of Significant Noncategorical IUs Zero

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

II. Significant Industrial User Compliance

	SIGNIFICANT INDUSTRIAL USERS	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No.of SIUs Submitting BMRs/Total	<u>0/0</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>2/5</u>	<u>0/0</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>2/5</u>	<u>0/0</u>

III. Compliance Monitoring Program

	<u>SIGNIFICANT CATEGORICAL</u>	<u>INDUSTRIAL USERS Non-Categorical</u>
1) No.of Control Documents Issued/Total No. Required	<u>5/5</u>	<u>0/0</u>
2) No.of Non-sampling Inspections Conducted Total No. Required	<u>0/0</u>	<u>0/0</u>
3) No.of Sampling Visits Conducted/Total No. Required	<u>167</u>	<u>0/0</u>
4) No.of Facilities Inspected (non-sampling) Total No. Required	<u>0/0</u>	<u>0/0</u>
5) No.of Facilities Sampled/Total No. Required	<u>5/5</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>12</u>	<u>0</u>
3) No. of Administrative Orders Issued to SIUs	<u>0/0</u>	<u>0/0</u>
4) No. of Civil Suits Filed	<u>0/0</u>	<u>0/0</u>
5) No. of Criminal Suits Filed	<u>0/0</u>	<u>0/0</u>
6) No. of Significant Violators (attach newspaper publication)	<u>2/5</u>	<u>0/0</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>0/0</u>	<u>0/0</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

III. Compliance Monitoring Program

SIGNIFICANT INDUSTRIAL USERS
Categorical Non-Categorical

1) No. of Control Documents Issued/Total No. Required	<u>5/5</u>	<u>0/0</u>
2) No. of Non-sampling Inspections Conducted Total No. Required	<u>0/0</u>	<u>0/0</u>
3) No. of Sampling Visits Conducted/Total No. Required	<u>167</u>	<u>0/0</u>
4) No. of Facilities Inspected (non-sampling) Total No. Required	<u>0/0</u>	<u>0/0</u>
5) No. of Facilities Sampled/Total No. Required	<u>5/5</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>12</u>	<u>0</u>
3) No. of Administrative Orders Issued to SIUs	<u>0/0</u>	<u>0/0</u>
4) No. of Civil Suits Filed	<u>0/0</u>	<u>0/0</u>
5) No. of Criminal Suits Filed	<u>0/0</u>	<u>0/0</u>
6) No. of Significant Violators (attach newspaper publication)	<u>2/5</u>	<u>0/0</u>
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8) Other Actions (sewer bans, etc	<u>0/0</u>	<u>0/0</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 Bosnick

Authorized Representative

Date

4/30/23

Jamie Belcourt (adpce.ad)

From: Denise Bosnick <dbosnick@westmemphisar.gov>
Sent: Monday, June 5, 2023 9:02 AM
To: Jamie Belcourt (adpce.ad)
Subject: RE: 2022-2023 PPS

Jamie,

Yes, there were no inspections performed on the five industry that require inspections Automated Conveyor Systems, Inc-Zero Discharger, PSC Customs, Transportation Equipment Cleaning, Master Halco, Zero Discharger, Qualawash Holdings Transportation Equipment Cleaning that has gone out of business at 400 Mound City Road and has taken over PSC Custom at 615 Petro Cove and Wastewater Solutions, Centralized Waste Treatment Facility. I know that this causes me to be out of compliance. I will tell you that we do go out on all the sites weekly and know if there are problems. I will correct this problem as soon as possible even though I know it is past the regulated time.

Denise



WEST MEMPHIS UTILITIES

Denise Bosnick

Director of Environmental Quality

604 East Cooper
P O Box 1868
West Memphis, AR 72303

Phone: 870-702-5141
Fax: 870-732-7623
dbosnick@westmemphisar.gov

www.westmemphisar.gov

From: Jamie Belcourt (adpce.ad)
Sent: Wednesday, May 31, 2023 8:25 AM
To: Denise Bosnick
Cc: Stacie Wassell (adpce.ad) ; Richard Healey (adpce.ad) ; David Ramsey (adpce.ad) ; Bryan Leamons (adpce.ad) ; Zachary Carroll (adpce.ad)
Subject: RE: 2022-2023 PPS

Ms. Bosnick,

The Annual Pretreatment Program Report submitted on May 12, 2023 indicates that there were zero (0) inspections conducted for the eight (8) significant industrial users. Please let me know if this is correct.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
Policy and Administration
5301 Northshore Drive | North Little Rock, AR 72118
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ARKANSAS

ENERGY & ENVIRONMENT

From: Denise Bosnick [<mailto:dbosnick@westmemphisar.gov>]
Sent: Wednesday, May 24, 2023 2:07 PM
To: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>
Subject: FW: 2022-2023 PPS



WEST MEMPHIS UTILITIES

Denise Bosnick
Director of Environmental Quality

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From: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>
Sent: Wednesday, May 24, 2023 10:56 AM
To: Denise Bosnick <dbosnick@westmemphisar.gov>
Subject: RE: 2022-2023 PPS

Denise,

Please sign this form and return it to me.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | **Office of Water Quality**
Policy and Administration
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | c: 501.287.8714 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS

ENERGY & ENVIRONMENT

From: Denise Bosnick [<mailto:dbosnick@westmemphisar.gov>]
Sent: Friday, May 12, 2023 9:52 AM
To: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>
Subject: 2022-2023 PPS



WEST MEMPHIS UTILITIES

Denise Bosnick
Director of Environmental Quality

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