

Henderson, Katie

From: Torrence, Rufus
Sent: Thursday, July 19, 2012 9:07 AM
To: Denise Bosnick
Cc: Henderson, Katie
Subject: AFIN 18-00109 AR0022039 City of West Memphis Pretreatment Program Modification: Streamlining Update



July 17, 2012

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

Re: City of West Memphis Streamlining Update
(Permit No. AR0022039, AFIN 18-00109)

Dear Ms. Bosnick:

The Department has reviewed the City's narrative attached to the West Memphis Utility Commission (WMUC) letter dated May 4, 2012. The narrative did not include the following:

1. Appendix F (City Attorney Letter) was missing. The last program narrative (approved on January 11, 1996) has a letter from the City Attorney (David Peeples) dated November 12, 1992. Since the letter is twenty years old, the Department recommends that the City submit a new letter or the City must confirm that the November 1992 letter is still applicable.
2. The narrative did not include a local limit development.
 - a. The City is discharging to the Mississippi River. Furthermore, the 2011 Annual Report shows that metals and cyanide are entering the POTW at typical domestic concentrations. Therefore, local limits for toxic pollutants appear unnecessary at this time.
 - b. The chart submitted with the WMUC email dated July 3, 2012 indicated ample capacity for BOD₅ and TSS loading:

In May 2011 the BOD₅ loading was 13,070 lbs/day and the TSS loading was 15,923 lbs/day. During this month the POTW was compliant with effluent limits (30 mg/l BOD₅ and 45 mg/l TSS). The average BOD₅ effluent concentration was only 5.6 mg/l and the average TSS effluent concentration was only 7.6 mg/l. Based on the 2011 Annual Report the average flow to the POTW was 4.6 MGD. Since no domestic loading for BOD₅ and TSS were submitted, the Department used typical values of 200 mg/l for each. Therefore, the MAILs are:

$$13,070 - (200 \times 4.6 \times 8.34) = 13,070 - 7673 = 5397 \text{ lbs/day BOD}_5 \quad \& \\ 15,923 - 7673 = 8250 \text{ lbs/day TSS}$$

The City currently has no point source (food processors, etc.) for BOD₅ and TSS but has ample capacity for any future loaders. Local limits for conventional pollutants appear unnecessary at this time.

In conclusion, local limits are not necessary at this time. Nonetheless, in accordance with 40 CFR 403.5(c)(1), the City must continue to monitor SIUs and develop local limits in the future as necessary.

On or before **August 31, 2012**, the Department will expect the City to submit a new Attorney letter based on 40 CFR 403.9(b)(1) or confirm that the existing letter from David Peebles dated November 12, 1992 is still applicable.

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,



Rufus Torrence, Pretreatment Engineer
Water Division

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