

Jamie Belcourt (adpce.ad)

From: Denise Bosnick <dbosnick@westmemphisar.gov>
Sent: Friday, July 14, 2023 11:56 AM
To: Jamie Belcourt (adpce.ad)
Attachments: Revised PPS.pdf



WEST MEMPHIS UTILITIES

Denise Bosnick

Director of Environmental Quality

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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 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>
5) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>2/5</u>	<u>0/0</u>

III. Compliance Monitoring Program

	<u>SIGNIFICANT</u> <u>Categorical</u>	<u>INDUSTRIAL USERS</u> <u>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</u> <u>Categorical</u>	<u>INDUSTRIAL USERS</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>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.

Denise Bosnick

Authorized Representative

Date

7/4/23

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	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)			
		Date	Date	Date	Date		Date	Date	Date						
Antimony	N/A	9/20/22	12/20/22	3/1/23	3/14/23		9/21/22	12/21/22	3/1/22	3/14/23					
		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	12.2	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	517.0	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	132.3	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	0.0091				<0.00020	0.034				<0.000200	0.005	EPA-245.1	0.00020		
Nickel	96.1	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	19.2	<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	250.0	-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	429.0	167	81.2	74	96.1	174030.0	60.4	51.7	42.5	43.0	20	EPA-200.8	10.0		
Chromium	351.7	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	100.0	<0.005	<0.005	<0.005	<0.005	12200.0	<0.005	<0.005	<0.005	<0.005	10	4500CHE-2016	0.005		
Arsenic	16.0	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	14.4	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...	0.0050		
Beryllium	100.0	<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 (3)	N/A					N/A									
1,4 Dichlorobenzene					1.25							624...	1.00		
Ethylbenzene					2.40							624...	1.00		

Toluene												624.1	5.00
Diesel Range Organics												80158-DRO	900
Oil Range Organics												80158-DRO	900
Surfactants												5540C-2011	0.400
Aluminum												EPA-200.8	100
Barium												EPA-200.8	1.00
Boron												EPA-200.8	25.0
Cobalt												EPA-200.8	1.00
Iron												EPA-200.8	100
Magnesium												EPA-200.8	100
Manganese												EPA-200.8	1.00
Tin												EPA-200.8	5.00
Titanium												EPA-200.8	1.00
4,4'DDT												EPA-608.3	0.00400
Dieldrin												EPA-608.3	0.00400
Phosphorus												365.4	2.50
Nitrate-Nitrite-N												4500N03F-2015	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	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
Out of Business at this location												
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 Use	Times Inspected	Times Sampled	Compliance Status (C, NC, or SNC)				Permit Limits
			Y/N	Last Action				Reports			Self Monitoring	
								BMR	90-day Compliance	Semi Annual		
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.

