

Torrence, Rufus

From: Torrence, Rufus
Sent: Thursday, April 08, 2010 4:00 PM
To: 'Denise Bosnick'
Subject: AFIN 18-00109 AR0022039 City of West Memphis 2009 Annual Report

ADEQ

ARKANSAS
DEPARTMENT OF ENVIRONMENTAL QUALITY

April 9, 2010

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

Re: City of West Memphis 2009 Annual Report
(Permit No. AR0022039, AFIN 18-00109)

Dear Ms. Bosnick:

The Department has reviewed the City's 2009 Annual Pretreatment Report and the report is complete. However, the Department has some recommendations to improve the City's program reporting.

1. Please remember to display the proper number of decimal places to correctly show the Mercury concentration in parts per billion ($\mu\text{g/l}$). For example, the City listed 12.9 $\mu\text{g/l}$ for the May 19, 2009 Mercury concentration. The correct concentration is 0.0129 $\mu\text{g/l}$.
2. In addition to the required Table III parameters, the City should list only the detected Table II (Appendix D, 40 CFR 122) parameters on the influent-effluent chart. Please note that Styrene and Alpha-Terpineol are not Table II parameters. Please refer to the attached APPD-CAS chart to help identify these parameters³. The City should show the applicable pretreatment standards in the third column of Attachment A. For example, Automated Conveyors is regulated by 40 CFR 433. The City should show how many times each SIU was inspected in the seventh column.

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

RT



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

April 1, 2010



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 (April 1 – April 30, 2010) and;
- 4) The following statement: For this reporting period March 2009 - February 2010 there were four significant violators for this reporting period.

Automated Conveyors
3850 Southland Drive
West Memphis, AR 72301

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

ATM Oil
435 Dacus Road
Marion, AR 72364

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

Grace Trailer
615 Petro Cove
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.

I trust this fulfills the requirements. Please let me know if further information is required.

Sincerely,

A handwritten signature in black ink that reads "Denise Bosnick". The signature is written in a cursive style with a large initial "D".

Denise Bosnick
Director of Environmental Quality

011 LEGAL NOTICES

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 2009- February 2010 there were four significant violators for this reporting period.

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Stateside Steel
304 Wyanoke Road
West Memphis, AR 72301
This was due to Technical Review Criteria (TRC) violations.
1, 2, 5, 6, 7, 8, 9, 12, 13, 14,
15, 16, 19, 20, 21, 22, 23, 26,
27, 28, 29, 30



WEST MEMPHIS UTILITY COMMISSION

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

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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

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 0 sampling visits made.

Compliance Status – SNC – 1 Oil & Grease violation.

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 103 sampling visits made.

Compliance Status – SNC – 1 pH violation and 5 Oil & Grease violations.



Department of Environmental Quality

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 134 sampling visits made.

Compliance Status – NC – 11 pH violation.

Grace Trailer Service

615 Petro Cove
West Memphis, Arkansas 72301

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 169 sampling visits made.

Compliance Status - SNC- 11 pH violations, 19 Oil and Grease violations and 1 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 133 sampling visits made.

Compliance Status -NC- 5 Copper violations.



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 4 sampling visits made.

Compliance Status – Compliant - no violations.

PSC Conatiner

400 Mound City Road
West Memphis, AR 72301

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 7 month period there has been a total of 25 sampling visits made.

Compliance Status - NC- 2 pH violations, 2 Oil and Grease violations and 1 Mercury violation.

Stateside Steel and Wire, LLC

304 Wyanoke Road
West Memphis, AR 72301

Categorical Industry

North American Industry Classification System - 331222

Industrial Waste Discharge Permit Number - 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 53 sampling visits made.

Compliance Status – SNC – 1 pH violations, 2 Chromium violations, 1 Lead violation and 3 Zinc violations.



MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2009 TO February 28, 2010
TREATMENT PLANT: City of West Memphis NPDES PERMIT #AR0022039
AVERAGE POTW FLOW: 4.6 MGD % IU FLOW: 15%

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		EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		Date	Date	Date	Date		Date	Date	Date	Date			
Antimony	N/A	5/19/2009	9/3/2009	10/29/2009	3/2/2010	N/A	5/19/2009	9/3/2009	10/29/2009	3/2/2010	1.00	EPA-200.8	
Cadmium	12.2	0.295	0.310	0.202	0.541	6510.0	0	0.266	0.370	0.138	0.100	EPA-200.8	
Copper	517.0	33.0	71.4	30.4	46.1	21200.0	7.75	10.8	19.1	8.43	0.500	EPA-200.8	
Lead	132.3	1.65	2.68	1.90	2.36	30630.0	0.507	1.05	0	0	0.500	EPA-200.8	
Mercury *	9.1	12.9	14.0	33.0	23.3	34.0	2.95	1.7	7.43	3.48	.005	EPA-1631E	
Nickel	96.1	5.67	3.29	4.92	5.38	829050.0	4.14	3.27	3.41	3.44	0.500	EPA-200.8	
Selenium	19.2	0	0	0	0	10910.0	0	0	0	0	2.00	EPA-200.8	
Silver	250.0	0.176	1.34	1.14	0.190	4260.0	0	0.275	0	0	0.100	EPA-200.8	
Zinc	429.0	64.6	166	76.9	131	174030.0	35.3	132	75.1	83.0	5.00	EPA-200.8	
Chromium	351.7	1.02	8.87	2.54	2.33	1230840.0	0	3.60	1.54	1.72	1.00	EPA-200.8	
Cyanide	100.0	0	0	0	0	12200.0	0	0	0	0	0.010	SM-4500CNE	
Arsenic	16.0	4.72	1.89	4.39	2.73	361640.0	4.75	2.75	4.39	2.75	0.500	EPA-200.8	
Molybdenum	14.4					N/A					--		
Phenols	N/A	0	0.031	0	0	N/A	0	0	0	0	5	EPA-420.1(Low Level)	
Beryllium	100.0	0	0	0	0	15200.0	0	0	0	0	0.500	EPA-200.8	
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.500	EPA-200.8	
Flow, MGD	N/A					N/A							
³ Phosphorus					3.12					2.34	.00625	SM-4500-PE	
Ammonia Nitrogen					9.05					1.03	.0050	SM-4500-NH3D	
Nitrate-Nitrite-N Benzene					0					3.23	3.00	SM-4500-NO3E	
Chloroform					2.77					2.77	1.00	624	
					3.33					1.29	1.00	624	

* Mercury shown in ng/l per fcl curv with Basnick on 4-7-10 @ 2:05 pm

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	
Automated Conveyors <i>**Only discharge to the city Sewer when they clean their equipment</i>	333922	40CFR 433	Y	6/15/2008	N	0	N/A	N/A	N/A	SNC/O&G	
ATM Oil	562219	N/A	Y	3/1/2005	N	103	N/A	N/A	N/A	NC/pH & O&G	
Coca-Cola Bottling	312111	N/A	Y	6/15/2008	N	134	N/A	N/A	N/A	NC/pH	
Grace Trailer	811192	40CFR 442 TEC	Y	6/15/2008	N	169	N/A	N/A	N/A	SNC/pH, O&G, & THP O&G	
Langston Bag	322224	N/A	Y	6/15/2008	N	133	N/A	N/A	N/A	NC/Copper	
Nu-Way	325612	N/A	Y	6/30/2008	N	4	N/A	N/A	N/A	Compliant	
PSC Container	811192	40CFR 442 TEC	Y	8/10/2009	Y	25	N/A	N/A	N/A	NC/pH, O&G & Mercury	
Stateside Steel	331222	40CFR 433 Metal Finisher	Y	3/24/2010	N	53	N/A	N/A	N/A	NC/pH, Chromium, Lead & Zinc	

1,4-Dichlorobenzene		3.00				0	1.00	624
Ethylbenzene		28.5				6.12	1.00	624
* Styrene		60.8				0	1.00	624
Toluene		9.58				5.66	5.00	624
* Alpha-Terpineol		34.4				0	1.02	625
Bis(2-ethylhexyl)phthalate		600				325	102	625
Phenol		30.2				0	5.10	625

(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 TBL 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.

* Styrene & Alpha-Terpineol are not Table II parameters.

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 2009 February 2010
 (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>0 / 0</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>3 / 4</u>	

* Tel Conv w/ Denise on 4-8-10 @ 10:15am. DSC Container is new SIU and BMR will be submitted within specified time frame

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>247</u>	<u>0</u>
4) No. of Facilities Inspected (nonsampling)	<u>4 / 4</u>	<u>0 / 0</u>
5) No. of Facilities Sampled	<u>3 / 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>30</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 Boonick
Authorized Representative

Date 4/1/2010

* Tel conv w/ Denise on 4-9-10 @ 10:15am; Automated Conveyor did not discharge and, hence, was not sampled.

PPS Program Report

* NPDES ID: AR 22039

Permittee's Name: West Memphis

* Report Received/Event Date: 04/06/2010

Date: 4-8-2010

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: 03/01/2009

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: 30
- 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:
- Notification of IU Schedule for Remedial Measures: No
- Initial 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: _____