

Yates, Adam

From: Yates, Adam
Sent: Wednesday, December 18, 2019 4:39 PM
To: 'Brad Wingfield'
Cc: Gary Carr; McWilliams, Carrie; Healey, Richard; Bolenbaugh, Jason
Subject: RE: AR0022560 Blytheville Wastewater Pretreatment Report

Brad,

Thank you for your response. After review and consideration of the justifications provided for the subject deficiencies, the previous determination will be amended to remove two of the noncompliance criteria. The City of Blytheville still meets two of the Level II Criteria:

- 1) failure to inspect or sample at least 80% of SIUs
 - based on not meeting the minimum sampling requirement of twice/year for CIUs
- 2) any other violation of concern to the Approval Authority
 - based on not conducting the full amount of influent/effluent monitoring for each POTW as required in Part II of their respective permits.

Therefore, per the aforementioned EPA Memorandum, the City will be reported on the Quarterly Noncompliance Report (QNCR) as being in Significant Noncompliance (SNC) with pretreatment program implementation requirements. If you have any questions or concerns, please feel free to contact me.

Thanks,

Adam Yates | State Pretreatment Coordinator
Office of Water Quality | Pretreatment Program
Arkansas Energy and Environment | [Environmental Quality](#)
5301 Northshore Drive, North Little Rock, AR 72118
t: (501) 682-0617 | e: yates@adeq.state.ar.us



From: Brad Wingfield [<mailto:BWingfield@pmico.com>]
Sent: Friday, November 22, 2019 8:37 AM
To: Yates, Adam
Cc: Gary Carr; McWilliams, Carrie; Healey, Richard; Bolenbaugh, Jason
Subject: RE: AR0022560 Blytheville Wastewater Pretreatment Report

Good morning Adam,

Attached you will find our response to your review of the August 2018 Pretreatment Program Annual Report.

Thanks,

Brad

Brad Wingfield, P.E.
Principal – Engineering Division
PMI | 3512 S. Shackleford Rd. | Little Rock, AR 72205
c: 501-258-2179
o: 501-221-7122
bwingfield@pmico.com
www.pmico.com

From: Yates, Adam [<mailto:yates@adeq.state.ar.us>]
Sent: Tuesday, November 5, 2019 4:31 PM
To: Brad Wingfield <BWingfield@pmico.com>
Cc: Gary Carr <gcarrblyww@gmail.com>; McWilliams, Carrie <mcwilliams2@adeq.state.ar.us>; Healey, Richard <HEALEYR@adeq.state.ar.us>; Bolenbaugh, Jason <BOLENBAUGH@adeq.state.ar.us>
Subject: RE: AR0022560 Blytheville Wastewater Pretreatment Report

Brad,

City of Blytheville's August 2018 Pretreatment Program Annual Report was received late on September 26, 2019 and has been reviewed. There are several deficiencies that indicate the Program may be in significant noncompliance with pretreatment requirements:

1. The influent/effluent monitoring results for each POTW are incomplete. The West Plant (AR0022560) and South Plant (AR0022578) both are missing one quarter of monitoring results. The North Plant (AR0022586) is missing three quarters of monitoring results.
2. The percentage of the average flow to the POTW contributed by industrial users (IUs) is not calculated for any of the POTWs. It is understood that one or two of the three POTWs may not receive any IU wastewater, but it cannot be all of them.
3. According to the previous year's report, it appears that Regal Beloit is no longer permitted under the City's Program. Per 40 CFR 403.12(i)(1), a brief explanation of why the IU was removed from the Program must be provided.
4. SIUs and CIUs must have their discharges sampled a minimum of twice per year either by the industry itself or the City. Two CIUs, Omnium LLC and Primetals, were only sampled once during the reporting period.
5. Attachment C indicates that there is one non-categorical SIU permitted under the City's Program; however, there is no information about this industry included in the report. At a minimum, the following information should be included: name, permit status, compliance status, number of inspections performed, and number of sampling visits.
6. Attachment A details the latest permit action for two CIUs, Primetals and Precoat Metals, as January 1, 2014. This is concerning because the action took place over 5 years ago and potentially indicates that the IU permits have expired.
7. Attachment A details the compliance status of semi-annual reporting for two CIUs, Primetals and Precoat Metals, as N/A. There should be an explanation for this determination.
8. The third column of the Attachment A table should also specify which Standards of that categorical determination are applicable to the IU. (e.g., Primetals is either subject to 433.15 - pretreatment standards for existing sources or 433.17 - pretreatment standards for new sources)

Based on this review and per the EPA Memorandum (1990) on “Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements” (link [here](#)), the City currently meets four of the Level II Criteria:

- 1) failure to issue control mechanisms to 90% of SIUs in a timely fashion,
- 2) failure to inspect or sample at least 80% of SIUs,
- 3) failure to enforce pretreatment standards and reporting requirements, and
- 4) any other violations of concern (e.g., incomplete influent/effluent monitoring) to the Approval Authority.

According to the EPA Memo, meeting two or more of the Level II Criteria is considered Significant Noncompliance (SNC) and should be reported on the Quarterly Noncompliance Report (QNCR). **Please provide a response for each of the deficiencies listed above within 30 days from the date of this email.**

Thank you for your cooperation in this matter. If you have any questions or concerns, please feel free to contact me.

Kindly,

Adam Yates | State Pretreatment Coordinator
Office of Water Quality | Pretreatment Program
Arkansas Energy and Environment | [Environmental Quality](#)
5301 Northshore Drive, North Little Rock, AR 72118
t: (501) 682-0617 | e: yates@adeq.state.ar.us



From: Brad Wingfield [<mailto:BWingfield@pmico.com>]
Sent: Thursday, September 26, 2019 11:31 AM
To: Yates, Adam
Cc: Gary Carr
Subject: AR0022560 Blytheville Wastewater Pretreatment Report

Adam,

Attached is the City of Blytheville’s 2019 Pretreatment Program Annual Report. Please review and let us know if you have any questions or comments.

Thanks,
Brad

Brad Wingfield, P.E.
Principal – Engineering Division
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November 21, 2019

Adam Yates
Arkansas Department of Environmental Quality
Office of Water Quality
5301 Northshore Drive
North Little Rock, AR 72118

RE: AR0022560 Blytheville Wastewater Treatment Report

Mr. Yates,

The following is a response to your email received on Tuesday, November 5, 2019, requesting clarifications on deficiencies in the City of Blytheville's August 2018 Pretreatment Program Annual Report. Our responses are as follow:

1. The influent/effluent monitoring results for each POTW are incomplete. The West Plant (AR0022560) and South Plant (AR0022578) both are missing one quarter of monitoring results. The North Plant (AR0022586) is missing three quarters of monitoring results.

The West and South Plant missing reports were due to a change in the pretreatment coordinator position and resulting miscommunication with the laboratory. Moving forward, steps have been created to ensure monitoring will be completed as required. The North Plant did not have discharge during the time period as flow was being diverted to the adjacent lagoon while UV construction was occurring.

2. The percentage of the average flow to the POTW contributed by industrial users (IUs) is not calculated for any of the POTWs. It is understood that one or two of the three POTWs may not receive any IU wastewater, but it cannot be all of them.

The South and West Plants do not receive any flow from industrial users. The North Plant receives approximately 80% residential and 20% industrial flow.

3. According to the previous year's report, it appears that Regal Beloit is no longer permitted under the City's Program. Per 40 CFR 403.12(i)(1), a brief explanation of why the IU was removed from the Program must be provided.

Regal Beloit was removed from the program because the facility was closed.

4. SIUs and CIUs must have their discharges sampled a minimum of twice per year either by the industry itself or the City. Two CIUs, Omnium LLC and Primetals, were only sampled once during the reporting period.

Similar to item #1, the pretreatment coordinator left the City of Blytheville during this time period and during the transition miscommunication with the laboratory resulted in the sampling error. Steps are in place to ensure sample occurs as required.

5. Attachment C indicates that there is one non-categorical SIU permitted under the City's Program; however, there is no information about this industry included in the report. At a minimum, the following information should be included: name, permit status, compliance status, number of inspections performed, and number of sampling visits.

It has been determined that Precoat Metals is a categorical SIU (40 CFR 465) and has current permit. The facility has been in compliance and has been inspected and sampled for the first half of the 2019 Pretreatment Report. A copy of the permit is included with this response.

6. Attachment A details the latest permit action for two CIUs, Primetals and Precoat Metals, as January 1, 2014. This is concerning because the action took place over 5 years ago and potentially indicates that the IU permits have expired.

The two other CIUs in the Blytheville Pretreatment Program are Omnium (40 CFR 455) and Primetals (40 CFR 413). Both facilities have active permit that are included with this response.

7. Attachment A details the compliance status of semi-annual reporting for two CIUs, Primetals and Precoat Metals, as N/A. There should be an explanation for this determination.

The compliance status of all IUs is C, Compliant.

8. The third column of the Attachment A table should also specify which Standards of that categorical determination are applicable to the IU. (e.g., Primetals is either subject to 433.15 - pretreatment standards for existing sources or 433.17 - pretreatment standards for new sources)

All IUs will fall under CFR 433.15 as they are existing facilities and their specific categorical pretreatment standards are listed above.

Sincerely,
PMI

A handwritten signature in blue ink, appearing to read "Brad Wingfield".

Brad Wingfield, P.E.
Principal – Engineering Division

Enclosure(s)

CITY OF BLYTHEVILLE, ARKANSAS
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO. 9

PRECOAT METALS
5888 EAST COUNTY ROAD
P.O. BOX 215
ARMOREL, AR 72310-215

has been classified as 40 CFR 465 because of its COIL COATING operations.
PRECOAT METALS shall maintain compliance with the provisions and conditions of the Discharge and Pretreatment Regulations in Ordinance # 1594 of 40 CFR 433, and also with any applicable provisions of local, federal or State of Arkansas laws or regulations, hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC No. 3479, and NAICS No. 332812 from premises located at the above address and through outfalls identified herein to the City of Blytheville's POTW collection system in accordance with effluent limitations, monitoring requirements, compliance schedule, reporting requirements, and conditions set forth in this permit and in the City of Blytheville's Pretreatment Program.

Noncompliance with any term or condition of this permit shall constitute a violation of the Blytheville Pretreatment Program.

This permit shall become effective on JANUARY-01-2019 and authorization to discharge shall expire at midnight on DEC 31ST 2024. The duration of this permit shall not exceed 5 years.

If the Permittee wishes to continue discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with requirements of the Discharge and Pretreatment Regulations of the Blytheville Pretreatment Program, a minimum of 90 days prior to the expiration date.

Signed this 19th day of SEPTEMBER-2018

Approved By: Gary Carr
WASTEWATER DIRECTOR

SECTION A. WASTESTREAM LOCATIONS

Location 001 Pretreatment System

The wastewater flow from the metal coating and engraving process tank flows directly to Location 001. Location 001 shall be the 22,000 gallon storage tank pump discharge line. This line also has an in-line flow meter. The flow from this tank will be batch or intermittent and operated by a float ball level system.

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to discharges from **Location 001 for the remainder of Precoats' permit unless otherwise specified.**

Parameter	LIMITATIONS ¹				MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average		Frequency	Sample Type
	(mg/l)	(lb/day)	(mg/l)	(lb/day)		
Cadmium, total	0.11		0.07		2-times/annually	Grab
Chromium, total	2.77		1.71		2-times/annually	Grab
Copper, total	3.38		2.07		2-times/annually	Grab
Lead, total	0.69		0.43		2-times/annually	Grab
Nickel, total	3.98		2.38		2-times/annually	Grab
Silver, total	0.43		0.24		2-times/annually	Grab
Mercury, total	0.005		-		2-times/annually	Grab
Zinc, total	2.61		1.48		2-times/annually	Grab
Cyanide, total	1.20		0.65		2-times/annually	Grab
Oil & Grease	100	-	-	-	2-times/annually	Grab
TTO, 40 CFR 433	2.13 mg/l		Report		2-times/annually	Grab
T.S.S.	300				2-times/annually	Grab

¹ The Permittee must monitor for TTO (Total Toxic Organics) at a frequency of one time every six months until a Toxic Organics Management Plan (TOMP) is developed and approved. On approval, certification statements are required in each monitoring report in lieu of TTO monitoring. Any TTO analysis performed according to the methods in 40 CFR 136 must be submitted in the monitoring reports and is limited as specified in this table.

⁵ The pH shall be maintained between a 6.0 minimum and 10.0 maximum at all times.

⁶ Flow must be recorded daily in gallons per day.

CITY OF BLYTHEVILLE, ARKANSAS
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO. 8

Omnium, The Crop Protection Products Manufacturing Division of Winfield Solutions, L.L.C. has been classified as 40 CFR 455 because of its Pesticide/Herbicide Formulating, Packaging, and Repackaging and 40 CFR 433. In compliance with the provisions and conditions of the Discharge and Pretreatment Regulations in Ordinance # 1594, of 40 CFR 433, and also with any applicable provisions of local, federal or State of Arkansas laws or regulations.

**Omnium, The Crop Protection Products Manufacturing Division
of Winfield Solutions, L.L.C.
400 Terra Road
Blytheville, AR 72315**

hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC No. 2879 and regulated under Subpart C of 40 CFR 455 from premises located at the above address and through outfalls identified herein to the City of Blytheville's POTW collection system in accordance with effluent limitations, monitoring requirements, compliance schedule, reporting requirements, and conditions set forth in this permit and in the Discharge and Pretreatment Regulations in noncompliance with any term or condition of this permit shall constitute a violation of the Blytheville Pretreatment Ordinance.

This permit shall become effective on April 10, 2015 and authorization to discharge shall expire at midnight on April 11, 2020. The duration of this permit shall not exceed 5 years.

If the Permittee wishes to continue discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with requirements of the Discharge and Pretreatment Regulations subchapter of the Blytheville Pretreatment Ordinance, a minimum of 90 days prior to the expiration date.

Signed this 10th day of April, 2015.

Approved By: _____


Pretreatment Coordinator

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to discharge from **Location 001**.

Parameter	LIMITATIONS ¹				MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average		Frequency ²	Sample Type
	(mg/l)	(lb/day)	(mg/l)	(lb/day)		
Copper, total	3.38				2-times/annually	Grab
Zinc, total	2.61				2-times/annually	Grab
Atrazine	Report				2-times/annually	Grab
Simazine	Report				2-times/annually	Grab
Amicarbazone	Report				2-times/annually	Grab
Clorothaonil	Report				2-times/annually	Grab
Metribuzin	Report				2-times/annually	Grab
Cypermetherin	Report				2-times/annually	Grab
Penhexomid	Report				2-times/annually	Grab
Mercury	<0.0005				2-times annually	Grab
Oil & Grease	100			2-times annually	Grab
Cyanide, total ²	1.20				2-times/annually	Grab
T.S.S. & BOD	300			2-times/annually	Grab
p.H.	6.0 s.u. minimum		9.0 s.u. maximum		2-times/annually	Grab
					
Flow, Discharge	Report		Report		Batch	Estimate

¹ It is the Permittee's responsibility to ensure test detection levels are sufficiently low to demonstrate compliance with permit limitations. If an analytical result is below the laboratory detection limit, then the detection limit shall be used in the calculation of pounds unless permitted otherwise by the Control Authority. The EPA recommends the following detection limits (mg/l): 0.001 cadmium, 0.01 chromium, 0.01 copper, 0.005 lead, 0.0002 mercury, 0.04 nickel, 0.002 silver, 0.02 zinc, 0.01 cyanide.

² Cyanide samples must be collected from Location 001.

³ Omnium shall also report for any other pesticide active ingredient (PA1) as identified in Table 10 of 40 CFR 455, the Pesticide Formulating, Packaging and Repackaging (PFPR) Category. Chemical Abstract System (CAS) numbers will be included.

CITY OF BLYTHEVILLE, ARKANSAS
BLYTHEVILLE WASTEWATER DEPARTMENT
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO. 13

Primetals Technologies USA LLC has been classified as a Categorical Industry (40 CFR 433 and 403.6) because of its MACHINE PARTS WASHING & OZONE TREATMENT/OIL & GREASE REMOVAL SYSTEM and its NICKEL PLATING PROCESS. STEEL RELATED TECHNOLOGIES must maintain compliance with the provisions and conditions of the Pretreatment Regulations in Ordinance 11 1594, of 40 CFR 433, and also with any applicable provisions of local, federal or State of Arkansas laws or regulations.

STEEL RELATED TECHNOLOGIES hereinafter called the Permittee, is authorized to discharge industrial wastewater from activities classified by SIC No. 7692 & 3471 from the premises located at the above address and through outfalls identified herein to the City of Blytheville's POTW collection system in accordance with effluent limitations, monitoring requirements, compliance schedule, reporting requirements, and conditions set forth in this permit and in the Pretreatment Regulations.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Blytheville's Pretreatment Ordinance.

This permit shall become effective on January 1, 2019 and authorization to discharge shall expire at midnight on December 31 2024. The duration of this permit shall not exceed 5 years.

If the Permittee wishes to continue discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with requirements of the Pretreatment Regulations subchapter of the Blytheville Pretreatment Ordinance, a minimum of 90 days prior to the expiration date.

Revised Due to Name Change:

Signed this 7th day of NOVEMBER, 2018.

Approved By: Dary Carr
Superintendent

Industrial User Fact Sheet

Name & Address of I.U.

Siemens Industry, Inc.
4313 E. State Hwy. 18
101 Terra Road
Blytheville, AR. 72315
(870) 762-1906

Phone Number

Type of I.U.

Machinery & Equipment
Repair/Cleaning/Ni & Cr
Plating for Steel Mill Ind.

Contacts

Josh Callis-Safety Mgr.
Lendall Yeater-Ni Plating Supv.
Chris Sutton-Cr Plating Supv.

Industry is classified as a Categorical User under 40 CFR 403 regulations with SIC # 7692, 3471. NAICS- 333319 & 332813.

Industrial User Discharge Permit # 13 (expires December 31, 2013)

Siemens Industry (formally Steel Related Technologies) conducts nickel & chrome plating on selected parts that are cleaned for the steel mill industry. The steel industry caster segments and rolls (large bearing systems) are cleaned with a high pressure cleaner with solvents prior to any plating. These wash waters are contained in the wash area and solids are hauled off site. The wastewater flows through a series (3) of settling tanks before discharge.

The nickel plating process is housed in 3 separate tanks that are heated. These are contained in a fiberglass pit. The nickel plating wastewater is pumped to a batch tank as needed to a holding tank where it is pretreated and sampled before notifying the city before discharge. This facility also has a filter press to remove solids for disposal.

The chrome plating process uses a long cylindrical tank standing up-right for the plating process. Rinse waters are pumped back to the pretreatment tank. This also has a wet fume scrubber with an evaporator to remove excess water.

This facility has 3 outfalls - # 001 high pressure wash/cleaning of machinery

002 nickel plating

003 chrome plating ✓ NOT DISCHARGING

PART I - SPECIFIC CONDITIONS, LIMITATIONS, AND REQUIREMENTS

SECTION A. WASTE STREAM LOCATIONS

Location 001 shall be a sampling well that is a concrete manhole outside the northeast corner of the facility. This waste stream goes through wash pits and from the clarifier/ozone/separator inside the building.

Location 002 shall be a holding tank inside the northeast corner of the building, which comes from the nickel plating process at the rear of the building.

Location 003 shall be a cylindrical tank inside the southwest corner of the building, which comes from the chromium plating process facility.

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to the discharge from **Location 001**. The Control Authority will monitor the discharge from **Location 001**, and the Permittee shall monitor the incoming water usage, and be limited as specified below:

Table I-1						
Parameter	LIMITATIONS ¹				MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average		Frequency	Sample Type
	(mg/l)	(lb/day)	(mg/l)	(lb/day)		
Cadmium, total	0.11				2-times/annually	24-hr composite
Chromium, total	2.77				2-times/annually	24-hr composite
Copper, total	3.38				2-times/annually	24-hr composite
Lead, total	0.69				2-times/annually	24-hr composite
Mercury, total <i>✓ 5.54</i>	0.0005				2-times/annually	24-hr composite
Nickel, total <i>✓ 3.98</i>	3.98				2-times/annually	24-hr composite
Silver, total	0.43				2-times/annually	24-hr composite
Zinc, total	2.61				2-times/annually	24-hr composite
Cyanide, total	1.20				2-times/annually	Grab
Oil & Grease	100	-----			2-times/annually	Grab
T. S.S. & B.O.D.5	300	-----			2-times/annually	24-hr composite
Flow, Usage l	Report	-----		Report	Continuous	Water Usage

¹ Usage flow (incoming water) shall be measured at the City water meter in the confines of the property.

Location 002

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to the discharge from **Location 002** except for flow usage, which apply as specified in the Table I-2 footnotes. The Control Authority will monitor the discharge from **Location 002**, and the Permittee shall monitor the incoming water usage, and be limited as specified below:

Parameter	LIMITATIONS ¹				MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average		Frequency ²	Sample Type
	(mg/l)	(lb/day)	(mg/l)	(lb/day)		
Cadmium, total	0.11		0.07		2-times/annually	GRAB
Chromium, total	2.77		1.71		2-times/annually	GRAB
Copper, total	3.38		2.07		2-times/annually	GRAB
Lead, total	0.69		0.43		2-times/annually	GRAB
Mercury, total	0.0005		--		2-times/annually	GRAB
Nickel, total	3.98		2.38		2-times/annually	GRAB
Silver, total	0.43		0.24		2-times/annually	GRAB
Zinc, total	2.61		1.48		2-times/annually	GRAB
Cyanide, total	0.86		0.32		2-times/annually	Grab
TTO, 40 CFR 433	2.13	-	-	-	2-times/annually	Certification-1
T.S.S.	300		-		2-times/annually	GRAB
Flow, Discharge	Report		Report		Continuous	Batch Tank
Oil & Grease	100				2-times/annually	Grab

1. The Permittee must monitor for TTO (Total Toxic Organics) at a frequency of one time every six months until a Toxic Organics Management Plan (TOMP) is developed and approved. On approval, certification statements are required in each monitoring report in lieu of TTO monitoring. Any TTO analysis performed according to the methods in 40 CFR 136 must be submitted in the monitoring reports and is limited as specified in this table.

² Usage flow (incoming water) shall be measured at the City water meter in the confines of the property.

³ Record daily flow for wastewater discharge on all monitoring days, and average daily and total monthly flow for water usage and wastewater discharges.

⁴ The p.H. shall be maintained between 6.0 s.u. and 10.0 s.u. at all times.

Location 003

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to the discharge from **Location 003** except for flow usage, which apply as specified in the Table I-2 footnotes. The Control Authority will monitor the discharge from **Location 003**, and the Permittee shall monitor the incoming water usage, and be limited as specified below:

Parameter	LIMITATIONS ¹				MONITORING REQUIREMENTS	
	Daily Maximum		Monthly Average		Frequency ²	Sample Type
	(mg/l)	(lb/day)	(mg/l)	(lb/day)		
Cadmium, total	0.11		0.07		2-times/annually	GRAB
Chromium, total	2.77		1.71		2-times/annually	GRAB
Copper, total	3.38		2.07		2-times/annually	GRAB
Lead, total	0.69		0.43		2-times/annually	GRAB
Mercury, total	0.0005		--		2-times/annually	GRAB
Nickel, total	3.98		2.38		2-times/annually	GRAB
Silver, total	0.43		0.24		2-times/annually	GRAB
Zinc, total	2.61		1.48		2-times/annually	GRAB
Cyanide, total	0.86		0.32		2-times/annually	Grab
TTO, 40 CFR 433	2.13	-	-	-	2-times/annually	Certification-1
T.S.S.	300		-		2-times/annually	GRAB
Flow, Discharge	Report		Report		Continuous	Batch
Oil & Grease	100		-		2-times/annually	Grab

1. The Permittee must monitor for TTO (Total Toxic Organics) at a frequency of one time every six months until a Toxic Organics Management Plan (TOMP) is developed and approved. On approval, certification statements are required in each monitoring report in lieu of TTO monitoring. Any TTO analysis performed according to the methods in 40 CFR 136 must be submitted in the monitoring reports and is limited as specified in this table.

⁵ Usage flow (incoming water) shall be measured at the City water meter in the confines of the property.

⁶ Record daily flow for wastewater discharge on all monitoring days, and average daily and total monthly flow for water usage and wastewater discharges.

⁷ The p.H. shall be maintained between 6.0 s.u. and 10.0 s.u. at all times.

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: July, 2018 TO August , 2019

TREATMENT PLANT: City of Blytheville - West NPDES PERMIT #AR0022560

AVERAGE POTW FLOW: 1.06 MGD % IU FLOW: 0 %

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)
		9/27/18	12/27/18	N/A	6/27/2019		9/27/18	12/27/18	N/A	6/27/2019			
Antimony	N/A	<1.00	<1.00		<1.00	N/A	<1.00	<1.00		<1.00	60	EPA-200.8	1
Cadmium		0.517	<0.100		<0.100	4	<0.100	<0.100		<0.100	0.5	EPA-200.8	0.1
Copper		42.5	48.0		48.9	29.5	8.95	6.88		2.41	0.5	EPA-200.8	0.5
Lead		3.36	1.42		1.52	11.7	0.962	0.836		<0.500	0.5	EPA-200.8	0.5
Mercury		0.00895	0.00750		0.035	0.013	0.0065	9.23		0.00441	.005	1631E	0.5
Nickel		3.75	3.01		2.47	322.7	2.54	2.68		2.8	0.5	EPA-200.8	0.5
Selenium		<1.00	<1.00		<1.00	50.3	<1.00	<1.00		<1.00	5	EPA-200.8	2
Silver		0.435	0.193		<0.100	124.4	<0.100	<0.100		<0.100	0.5	EPA-200.8	0.1
Zinc		67.3	64.2		100	477.19	17.9	34.8		<20.0	20	EPA-200.8	5
Chromium		1.72	<1.00		1.15	204.38	<1.00	<1.00		<1.00	10	EPA-200.8	1
Cyanide		<5	<5		<5	84.3	<5	<5		<5	10	4500CNE- 2011	0.01
Arsenic		3.08	2.96		1.62	N/A	2.65	2.23		2.79	0.5	EPA-200.8	0.5
Molybdenum						N/A					--		
Phenols	N/A	<5	31.9		56.0	N/A	<5	7.3		12.7	5	420.1	0.5
Beryllium		<0.500	<0.500		<0.500	N/A	<0.500	<0.500		<0.500	0.5	EPA-200.8	0.5
Thallium	N/A	<0.100	<0.200		<0.200	N/A	<0.100	<0.200		<0.200	0.5	EPA-200.8	0.005

Flow, MGD	N/A	N/A	N/A	N/A	N/A	N/A	0.92	0.918	1.69	0.73			
(3)													

(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

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: July, 2018 TO August , 2019

TREATMENT PLANT: City of Blytheville - South NPDES PERMIT #AR0022578

AVERAGE POTW FLOW: 1.04 MGD % IU FLOW: 0 %

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)
		9/27/18	12/27/18	N/A	6/27/2019		9/27/18	12/27/18	N/A	6/27/2019			
Antimony	N/A	<1.00	<1.00		<1.00	N/A	<1.00	<1.00		<1.00	60	EPA-200.8	1
Cadmium		<0.100	<0.100		<0.100	4	<0.100	<0.100		<0.100	0.5	EPA-200.8	0.1
Copper		29.3	48.0		41.3	29.5	4.11	6.88		2.38	0.5	EPA-200.8	0.5
Lead		1.75	1.42		1.79	11.7	0.640	0.836		<0.500	0.5	EPA-200.8	0.5
Mercury		0.00705	0.00750		0.010	0.013	0.00237	9.23		0.00452	.005	1631E	0.5
Nickel		2.5	3.01		2.12	322.7	1.69	2.68		2.47	0.5	EPA-200.8	0.5
Selenium		<1.00	<1.00		<1.00	50.3	<1.00	<1.00		<1.00	5	EPA-200.8	2
Silver		0.110	0.193		<0.100	124.4	<0.100	<0.100		<0.100	0.5	EPA-200.8	0.1
Zinc		49.7	64.2		168	477.19	<10.0	34.8		<20.0	20	EPA-200.8	5
Chromium		<1.00	<1.00		1.27	204.38	<1.00	<1.00		<1.00	10	EPA-200.8	1
Cyanide		<5	<5		<5	84.3	<5	<5		<5	10	4500CNE-2011	0.01
Arsenic		2.75	2.96		1.50	N/A	2.80	2.23		2.71	0.5	EPA-200.8	0.5
Molybdenum						N/A					--		
Phenols	N/A	<5	31.9		9.7	N/A	<5	7.3		5.8	5	420.1	0.5
Beryllium		<0.500	<0.500		<0.500	N/A	<0.500	<0.500		<0.500	0.5	EPA-200.8	0.5
Thallium	N/A	<0.100	<0.200		<0.200	N/A	<0.100	<0.200		<0.200	0.5	EPA-200.8	0.005

Flow, MGD	N/A	N/A	N/A	N/A	N/A	N/A	0.82	0.718	1.74	0.90			
(3)													

(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.**

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(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

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: July, 2018 TO August , 2019

TREATMENT PLANT: City of Blytheville - North NPDES PERMIT #AR0022586

AVERAGE POTW FLOW: 0.522 MGD % IU FLOW: 0 %

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)
		N/A	N/A	N/A	6/27/2019		N/A	N/A	N/A	6/27/2019			
Antimony	N/A				<1.00	N/A				<1.00	60	EPA-200.8	1
Cadmium					<0.100	4				<0.100	0.5	EPA-200.8	0.1
Copper					41.6	29.5				3.55	0.5	EPA-200.8	0.5
Lead					0.830	11.7				<0.500	0.5	EPA-200.8	0.5
Mercury					0.046	0.013				0.00542	.005	1631E	0.5
Nickel					8.72	322.7				172	0.5	EPA-200.8	0.5
Selenium					<1.00	50.3				<1.00	5	EPA-200.8	2
Silver					0.123	124.4				<0.100	0.5	EPA-200.8	0.1
Zinc					156	477.19				52.2	20	EPA-200.8	5
Chromium					1.56	204.38				4.02	10	EPA-200.8	1
Cyanide					<5	84.3				<5	10	4500CNE- 2011	0.01
Arsenic					2.04	N/A				5.17	0.5	EPA-200.8	0.5
Molybdenum						N/A					--		
Phenols	N/A				31.9	N/A				<5	5	420.1	0.5
Beryllium					<0.500	N/A				<0.500	0.5	EPA-200.8	0.5
Thallium	N/A				<0.200	N/A				<0.200	0.5	EPA-200.8	0.005

Flow, MGD	N/A	N/A	N/A	N/A	N/A	N/A	0.00	0.00	0.00	0.522			
(3)													

(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.**

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(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

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 BLYTHEVILLE WASTEWATER DEPARTMENT

Address 4834 N.C.R. 639 / PO BOX 1784

City BLYTHEVILLE State/Zip ARKANSAS 72315

Contact Person GARY CARR Position DEPARTMENT MANAGER

Contact Telephone 870-763-4961 NPDES Permit Nos. AR0022560, AR0022578, AR0022586

Reporting Period AUGUST 2018 JULY 2019

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

Total Number of Categorical IUs 3

Total Number of Significant Noncategorical IUs 1

Total Number of Non-Significant (yet permitted) IUs 0

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>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>2/2</u>	<u>/</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>0/3</u>	<u>0/0</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical) . .	<u>0</u>	

III. Compliance Monitoring Program

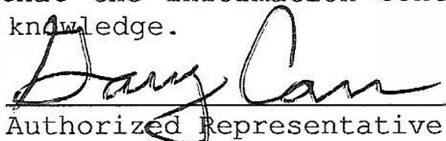
	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued / Total No. Required.	<u>0/0</u>	<u>0/0</u>
2) No. of Non-sampling Inspections Conducted / Total No. Required.	<u>3/3</u>	<u>0/0</u>
3) No. of Sampling Visits Conducted / Total No. Required.	<u>4/6</u>	<u>0/0</u>
4) No. of Facilities Inspected (nonsampling) / Total No. Required.	<u>3/3</u>	<u>0/0</u>
5) No. of Facilities Sampled / Total No. Required.	<u>3/3</u>	<u>0/0</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</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>0</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>0</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.


 Authorized Representative

Date SEPT-26-2019