

Peltier, Hannah

From: Gilliam, Allen
Sent: Tuesday, December 30, 2014 2:42 PM
To: tdjblyww@gmail.com
Cc: Trotta, Jacqueline; Fuller, Kim; Peltier, Hannah; Shafii, Mo
Subject: AR0022560_Blytheville South POTW AR0022578 initial Dec 2014 Mercury Progress report Signatory change with ADEQ reply_20141230
Attachments: South initial mercury progress report.pdf

Thomas,

Thank you for the corrected South plant's Hg analytical data, the contract lab's results and the signatory change form (attached).

All Hg concentrations reported were well above the South plant's limitations which will take effect on 1/1/17 per its permit requirements unless "reasonable potential" can be analytically proven otherwise.

Per the POTW's Permit Compliance requirements in Section B, Page 1 of Part IB, "If reasonable potential still exists following the submittal of additional data points for Mercury, the initial Progress Report must detail how the permittee plans to come into compliance with the Mercury limits within the remaining 2 years of the Interim period. Options must be provided that were considered along with which option* was selected. Any Best Management Practices (BMPs) that have been instituted to reduce the Mercury levels in the influent must also be discussed. If a study will be performed, a milestone schedule for the study must be provided.

* The permittee has the option to undertake any study deemed necessary to meet the final limitations during the interim period. Any additional treatment (including chemical addition) must be approved and construction approval granted prior to final installation."

Blytheville's attached corrective action plan only partially meets the above requirements. You've stated several treatment options "considered", but none selected and the "Progress Report" did not "detail how the permittee plans to come into compliance with the Mercury limits within the remaining 2 years of the Interim period."

Please submit within ninety (90) days from the date on this correspondence what treatment option or options have been selected and a more detailed plan how Blytheville intends to come into compliance with the South plant's Hg limits.

If you have further questions or comments please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Trotta, Jacqueline
Sent: Tuesday, December 30, 2014 11:57 AM
To: Gilliam, Allen

Cc: tdjblyww@gmail.com

Subject: AR0022578_Mercury Progress report

Allen,

Mr. Jones corrected the report per what we asked him to do. Please see attached. Let me know if he needs to send the original in the mail or if the attached will suffice. (I separated the change in authorization form and send it on to the permit department in a separate email).

Thanks,

Jacqueline Trotta
Enforcement Analyst
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118
501-682-0632

From: Thomas Jones [<mailto:tdjblyww@gmail.com>]

Sent: Tuesday, December 30, 2014 11:40 AM

To: Trotta, Jacqueline

Subject: Re:

Here is the South mercury progress report.

On Tue, Dec 30, 2014 at 10:23 AM, Trotta, Jacqueline <Trotta@adeq.state.ar.us> wrote:

Thanks!

Appendix 2


REQUEST FOR CHANGE OF AUTHORIZATION (CERTIFICATION AND SIGNATORY REQUIREMENTS)

NPDES Permit Number: AR 0022586
AR 0022560
AR 0022578 Facility Name: BLYTHEVILLE WASTEWATER

Type of Change: ☒ New Cognizant Official (or duly authorized representative) (sections 1 and 2)
 (check one) ☐ New Ranking Official (complete section 2 only)
☐ Both (sections 1 and 2)

1. **NEW COGNIZANT OFFICIAL** (or duly authorized representative) (See 122.22(b); the individual, authorized by the ranking official in writing, as **having responsibility for the overall operation** of the regulated facility or activity responsibility, or having overall responsibility for environmental matters for the company.)

The ranking official hereby designates the following individual as the cognizant official, (duly authorized representative), for signing the permit required reports, etc., including Discharge Monitoring Reports (DMR) required by the permit, and other information requested by the Director:


 Signature of the Cognizant Official (Duly Authorized Representative)


Thomas Jones
 Name (first name, mi, last name) Typed or Printed

P.O. Box 1784 Blytheville, AR 72316
 Mailing Address City, State and ZIP

Pretreatment Coordinator 1870 763 4961
 Title A/C Phone FAX

By signature below, the ranking official certifies that the above named individual is qualified to act as the duly authorized representative under the provisions of 40 CFR 122.22(b).

2. **RANKING OFFICIAL** (Note: The ranking official is the person authorized to sign the permit application i/a/w 40CFR 122.22(a). For a Corporation: it is the responsible corporate officer. Partnership or sole proprietorship: the general partner or proprietor. Municipality, State, Federal or other public agency: the principal executive officer or ranking elected official.)

 12-29-14

Signature of the Ranking Official Date

KENNETH O. ELLIS

Name (first name, mi, last) Typed or Printed

P.O. Box 1784 BLYTHEVILLE, AR 72316
 Mailing Address City, State and ZIP

SUPERINTENDENT 1870 763-4961 870-763-8541
 Title A/C Phone FAX

Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



ENVIRONMENTAL TESTING & CONSULTING, INC.

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2790 Whitten Road

Memphis, Tennessee 38133

(901) 213-2400

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"A Laboratory Management Partner"

03316

Blytheville Sewer Department

Mr. James Yankee

P.O. Box 1784

Blytheville, AR 72316

Project West, North & South WWTP - Monthly
Information :

Report Date : 03/05/2014

Received : 2/19/2014

Report Number : **14-050-0297**

REPORT OF ANALYSIS

Lab No : **94607**

Matrix: **Aqueous**

Sample ID : **South Effluent**

Sampled: **2/19/2014 8:30**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Nitrate (NO3-N)	5.64	mg/L	0.100	1	02/19/14 16:00	RQE	EPA-300.0
Nitrite (NO2-N)	2.31	mg/L	0.100	1	02/19/14 16:00	RQE	EPA-300.0
Nitrate+Nitrite-N	7.95	mg/L	0.100	1	02/19/14 16:00		EPA-300.0
Total Phosphorus	0.422	mg/L	0.250	5	02/20/14 08:40	TKM	4500PE-2011
Total Copper	2.79	µg/L	0.500	1	02/20/14 19:49	RQE	EPA-200.8
Total Mercury	90.1	ng/L	0.500	1	02/26/14 16:51	ARG	EPA-1631E

Qualifiers/ Definitions

*

MQL

Outside QC limit

Method Quantitation Limit

DF

Dilution Factor



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Blytheville Sewer Department

Mr. James Yankee

P.O. Box 1784

Blytheville, AR 72316

Project West, North & South WWTP - Monthly

Information : Project #052114

Report Date : 05/30/2014

Received : 5/21/2014

Report Number : 14-141-0301

REPORT OF ANALYSIS

Lab No : 91336

Matrix: Aqueous

Sample ID : South Effluent

Sampled: 5/21/2014 8:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Nitrate (NO3-N)	6.93	mg/L	0.100	1	05/21/14 15:32	RQE	EPA-300.0
Nitrite (NO2-N)	0.448	mg/L	0.100	1	05/21/14 15:32	RQE	EPA-300.0
Nitrate+Nitrite-N	7.38	mg/L	0.100	1	05/21/14 15:32		EPA-300.0
Total Phosphorus	0.406	mg/L	0.050	1	05/22/14 08:35	TKM	4500PE-2011
Total Copper	3.30	µg/L	0.500	1	05/27/14 23:02	RQE	EPA-200.8
Total Mercury	22.9	ng/L	0.500	1	05/27/14 18:18	ARG	EPA-1631E

Qualifiers/ Definitions

*
MQL

Outside QC limit
Method Quantitation Limit

DF

Dilution Factor



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Blytheville Sewer Department

Mr. James Yankee

P.O. Box 1784

Blytheville, AR 72316

Project West, North & South WWTP - Monthly
Information :

Report Date : 06/30/2014

Received : 6/13/2014

Report Number : **14-164-0306**

REPORT OF ANALYSIS

Lab No : **96183**

Sample ID : **South Effluent**

Matrix: **Aqueous**

Sampled: **6/13/2014 8:30**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Nitrate (NO3-N)	5.15	mg/L	0.100	1	06/13/14 15:14	RQE	EPA-300.0
Nitrite (NO2-N)	0.407	mg/L	0.100	1	06/13/14 15:14	RQE	EPA-300.0
Nitrate+Nitrite-N	5.56	mg/L	0.100	1	06/13/14 15:14		EPA-300.0
Total Phosphorus	0.421	mg/L	0.050	1	06/27/14 08:25	KM2	4500PE-2011
Total Copper	5.22	µg/L	0.500	1	06/18/14 17:16	RQE	EPA-200.8
Mercury (Total)	53.5	ng/L	0.500	1	06/18/14 18:05	ARG	EPA-1631E

Qualifiers/ Definitions

*
MQL

Outside QC limit

Method Quantitation Limit

DF

Dilution Factor



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Blytheville Sewer Department

Mr. James Yankee

P.O. Box 1784

Blytheville, AR 72316

Project West, North & South WWTP - Monthly
Information : Project #091014WNS

Report Date : 09/25/2014

Received : 9/10/2014

Report Number : 14-253-0313

REPORT OF ANALYSIS

Lab No : 93100

Sample ID : South Effluent

Matrix: Aqueous

Sampled: 9/10/2014 8:30

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Nitrate (NO3-N)	13.6	mg/L	1.00	10	09/10/14 18:34	RQE	EPA-300.0
Nitrite (NO2-N)	0.166	mg/L	0.100	1	09/10/14 18:17	RQE	EPA-300.0
Nitrate+Nitrite-N	13.8	mg/L	0.100	1	09/10/14 18:17		EPA-300.0
Total Phosphorus	0.696	mg/L	0.250	5	09/16/14 09:04	KM2	4500PE-2011
Total Copper	4.08	µg/L	0.500	1	09/11/14 18:47	RQE	EPA-200.8
Mercury (Total)	182	ng/L	5.00	10	09/23/14 18:58	ARG	EPA-1631E

**Qualifiers/
Definitions***
DFOutside QC limit
Dilution FactorB
MQLAnalyte detected in blank
Method Quantitation Limit



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Blytheville Sewer Department

Mr. James Yankee

P.O. Box 1784

Blytheville, AR 72316

Project West, North & South WWTP - Monthly
Information :

Report Date : 11/05/2014

Received : 10/15/2014

Report Number : **14-288-0268**

REPORT OF ANALYSIS

Lab No : **89836**

Matrix: **Aqueous**

Sample ID : **South Effluent**

Sampled: **10/14/2014 8:30**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Nitrate (NO3-N)	5.75	mg/L	0.100	1	10/15/14 15:09	RQE	EPA-300.0
Nitrite (NO2-N)	0.562	mg/L	0.100	1	10/15/14 15:09	RQE	EPA-300.0
Nitrate+Nitrite-N	6.31	mg/L	0.100	1	10/15/14 15:09		EPA-300.0
Total Phosphorus	1.20	mg/L	0.250	5	10/31/14 09:13	KM2	4500PE-2011
Total Copper	7.60	µg/L	0.500	1	10/16/14 16:08	RQE	EPA-200.8
Mercury (Total)	24.8	ng/L	0.500	1	10/31/14 21:39	ARG	EPA-1631E

Qualifiers/ Definitions

*
MQL

Outside QC limit
Method Quantitation Limit

DF

Dilution Factor



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Blytheville Sewer Department

Mr. James Yankee

P.O. Box 1784

Blytheville, AR 72316

Project West, North & South WWTP - Monthly
Information :

Report Date : 11/26/2014

Received : 11/11/2014

Report Number : 14-315-0255

REPORT OF ANALYSIS

Lab No : 95651

Matrix: Aqueous

Sample ID : South Effluent

Sampled: 11/11/2014 0:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Nitrate (NO3-N)	10.7	mg/L	1.00	10	11/11/14 15:21	CGC	EPA-300.0
Nitrite (NO2-N)	<0.100	mg/L	0.100	1	11/11/14 15:04	CGC	EPA-300.0
Nitrate+Nitrite-N	10.7	mg/L	0.100	1	11/11/14 15:04		EPA-300.0
Total Phosphorus	0.636	mg/L	0.250	5	11/12/14 09:00	DBB	4500PE-2011
Total Copper	5.01	µg/L	0.500	1	11/12/14 18:33	RQE	EPA-200.8
Mercury (Total)	104	ng/L	0.500	1	11/14/14 21:01	ARG	EPA-1631E

Qualifiers/ Definitions

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor

December 30, 2014

Ms. Jacqueline Trotta
Water Division, Enforcement Branch
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: NPDES Permit No: AR0022578, AFIN 47-00925

Dear Ms. Trotta,

The City of Blytheville Wastewater Department is submitting its initial progress report for Mercury Discharge from our South Treatment Facility.

Here are some of the previous Mercury test results from this year for your review.

February 2014-	0.0901 ug/L
May 2014-	0.0229 ug/L
June 2014-	0.0535 ug/L
September 2014-	0.182 ug/L
October 2014-	0.0248 ug/L
November 2014-	0.104 ug/L

There are no industries discharging to this treatment plant only residential and light commercial facilities.

At this time results show that we are not meeting requirements for Permit # AR0022578 to go into effect January 1, 2017.

Per our CAP, four different types of Mercury removal treatment are being considered; precipitation, carbon adsorption, ion exchange, and biological treatment.

Attached are the lab results from ETC lab out of Memphis TN. If you need more information or have any questions, please contact me at (870)763-4961.

Sincerely,



Thomas Jones
Pretreatment Coordinator
Blytheville Wastewater Department