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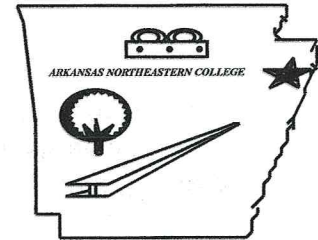
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December 7, 2010

Allen Gilliam  
NPDES State Pretreatment Coordinator  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

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DEC - 9 2010  
IH  
Adequate response  
AB

Re: City of Blytheville (NPDES # AR0022560) Pretreatment Program  
Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Gilliam,

Please find enclosed with this letter, the City of Blytheville's reply to the audit findings with proposed corrective actions. Discussions with newly elected officials about the City's Pretreatment Program and the recommendations in the audit will be conducted after the first of the year when they officially take office.

If you have any questions or need more information, please contact me at (870) 763-4961.

Sincerely,

James Yankee  
Pretreatment Coordinator

## SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

- 1) Under 40 CFR 403.8(f)(1)(iii)(C)“...[permits]...must contain effluent limits based on applicable...categorical pretreatment standards...”
  - a) During the file review the limits page included the correct concentration limits, but also included mass limits. The basis for the mass limits, could not be explained nor were explained in the permits’ fact sheets. Remove the mass limits until the City can ascertain if they are necessary. Provide the basis if so.

✓ **Mass limits have been removed from Industrial Users permits.**

- b) Siemens’ permit limits page only included the categorical Daily Maximum limits, but must also include their categorical Monthly Average Limits.

✓ **Location # 001 permit limits for lbs/day has been removed. Locations # 002 & 003 contained Daily Maximum and Monthly Average Limits.**

- c) Motor Appliance batch discharges. Correct their sample type from 24 hr. composite to “[number] of grabs over the batch discharge period.”

✓ **Permit limits have been changed to 3 grab samples during their batch discharge period.**

- 2) Under 40CFR 403.8(f)(I)(v) “[The City will] Carry out all inspections, surveillance and monitoring and monitoring procedures necessary to determine, independent of information supplied by IUs...etc.

The industry inspections are still not comprehensive enough, included only basic/vague information (in some cases, none) regarding the various processes, wastestream identification, chemicals handling, products, pretreatment system, raw materials, etc.

Some improvement has been made since the last audit, but more narrative needs to be included before this auditor could call the inspections comprehensive. It was pointed out again if the City’s IU inspections asked and narratively answered all questions on the Audit Checklist, Section III, part D.9.a. through m. (“Inspections”), an adequate inspection would have been complete.

✓ **All inspection forms will include the Audit checklist mentioned above to perform an adequate inspection of all facilities.**

3) Section D.1. of the IU permits requires a Pollution Prevention Assessment to be conducted with the submittal due within 1 year of the effective date of the permit". During the file reviews, no P2 submittals could be found or produced. Either enforce this requirement or remove the language from existing permits and the City's Pretreatment Ordinance.

✓ *We will discuss this issue with the newly elected officials to enforce or remove this requirement.*

4) Under 40 CFR 403.12(e) "Periodic reports on continued compliance...shall include a record of measured or estimated average and maximum daily flows...". Not all reports included process flow separately from the entire facility flow. The regulated wastewater must be identified and separately reported. If it is unfeasible to measure the regulated vs. total plant flow, an explanation of the estimated regulated flow must be provided.

✓ *All regulated waste streams will be identified and measured, if feasible to comply with this requirement.*

5) Under 40 CFR 403.8(f)(2)(i) "[The City will] Identify and locate all possible IUs which might be subject to the POTW Pretreatment Program.

Any compilation, index or inventory of IUs made under this paragraph shall be made available to the [ADEQ auditor] upon request"

While there was evidence some IU surveys were recently sent, not all IUs "verbal" or "drive-by" surveys were dated or documented in a master file. Explain why they're not significant IUs. Continue with hard copy survey that is currently "on-going".

✓ *A master file for wastewater surveys and possible I.U.s will be compiled, with dates and times to determine if the facility is significant user.*

6) Under 403.12 (b)(3) "The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of discharge to the POTW from the regulated processes". The City must require updated schematics from their IUs. Some IU schematics in their files did not "fit" the actual process layouts at the facilities visited. It was difficult to determine work piece or wastewater flow an general layout of all wastewater generating operations.

One case in point: The sampling site or sites at Steel Related Technologies (SRT) was not clear on the schematic on file with the City. The facility's chrome plating line had not been updated for the City's file. There was a blank space on the sheet where it was to be placed, but it is now fully functional and is not located on the schematic in the City's files. Send the IU their schematics and require them to update as necessary and submit for the City's files.

✓ All permitted I.U.s will be required to update their process flow schematics with points of discharge.

- 7) Under 40 CFR 403.8(f)(2)(vi) [The City] shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program(iv) "...analyze self-monitoring [City does this] reports and other notices submitted by Industrial Users in accordance with the self-monitoring [City] requirements in &403.as..."

During the file review, it was uncertain how the City verified compliance with Motor Technology's aluminum die-casting quench tank discharge limits under 40 CFR 464. The IU's permit limits should be converted to equivalent concentration as opposed to mass. These step-by-step calculations should be located in their fact sheet.

The City must confirm the IU's production and flow batch discharged from the quench tank to ascertain their allowable mass limits, hence conversion to equivalent concentration.

Motor Technology's quench tank is very infrequently batch discharged compared to the amount of aluminum poured. The allowable mass as well as the equivalent concentration limits will possibly be a hundred times the normal die caster's limits, but the City must verify compliance.

It was uncertain and could not be explained how compliance assurance was being conducted.

✓ We will begin collecting data from Motor Technologies aluminum die-casting quench tank to determine compliance assurance on this waste stream.