

## Gilliam, Allen

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**From:** Gilliam, Allen  
**Sent:** Friday, November 18, 2011 7:28 AM  
**To:** Harrison tim holt  
**Cc:** harrison kathryn catlin (Kathryn.catlin@cityofharrison.com)  
**Subject:** AR0034321\_Harrison Response to Sept 2011 Audit Findings Reply\_20111117

Tim,

Your responses to the latest Audit findings were reviewed and deemed adequate.

One point to stress in your response to deficiency #4(a), "...facility schematics and process descriptions": these need to be fairly comprehensive and conjunctive to fully understand each industries' process wastewater flow from process(es) through pretreatment (where necessary) to the final discharge/sampling point. One should be able to review their file and understand their process(es) and wastewater flows without stepping foot in their facility.

The earlier correspondence you sent regarding "additional temporary sampling" was also reviewed and will be treated as a temporary non-substantial Pretreatment modification. No formal Program modification submittal per 40 CFR 403.18(d) will be required by this office.

You may proceed with this practice until you feel comfortable your permitted industries' samples/analysis are valid and accurate per 40 CFR 403.8(f)(2)(v). This was a good practice to begin "introducing" yourself and your legal authority allowing your industries knowledge you have the discretion to conduct un-announced sampling or inspections at any time.

Thank you for your interest in Harrison's implementation of a successful Pretreatment Program.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625



**CITY OF HARRISON**  
DEPARTMENT OF PUBLIC WORKS  
PRETREATMENT DEPARTMENT



Dear Allen,

Upon reviewing the Pretreatment Program Audit/Pollution Prevention Assessment, I have listed below the status on the required action findings during my recent audit by ADEQ:

**(B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS**

(1) (a) The City must remove the City's Ordinance O&G limits from the permits.

**Solution: The revisions to the Industrial User Permits will be completed by November 30, 2011.**

(b) The City should contact their contract lab to make appropriate revisions to their Chain of Custody to make them most complete.

**Solution: Tim Holt contacted Randy Thomas at ETC and a new Chain of Custody with columns for preservative type, type of container and quantity has been provided to the City.**

(c) Claridge Extrusions permit must be recalculated without a dilution factor.

**Solution: The revisions to the Claridge Extrusions Industrial User Permit will be completed by November 30, 2011.**

(d) The permits must be revised to include these provisions including the \$1000/day/violation penalty.

**Solution: The revisions to the Industrial User Permits to include the \$1000/day/violation penalty will be completed by November 30, 2011.**

(2) Make a more comprehensive Industrial User Inspection form.

**Solution: Tim Holt revised the City of Harrison Industrial User Inspection form to include items listed on the example form provided by Allen Gilliam, ADEQ.**

(3) The CITY is required to conduct this slug discharge potential evaluation. The City has a basic slug evaluation form and must complete a slug discharge potential evaluation with the aid of their industry representatives and document the evaluations in their IUs' files.

**Solution: The Slug discharge evaluations have been completed and placed in the SIU files.**

(4) (a) The City must require its permitted industries to keep facility schematics and process descriptions updated.

**Solution: All permitted Industrial Users files have been updated to include current schematics and process descriptions provided by the industrial user.**

(b) Industries must provide information showing flow and pH meters have been calibrated.

**Solution: Tim Holt mailed letters to each industry reminding them of the calibration requirement and stating they must provide this office with that information within 10 days.**

(5) Under 40 CFR 403.8(f)(1)(B)(4) "...individual...control mechanisms must be enforceable and contain, at a minimum, the following conditions: Self-monitoring, sampling, reporting, notification and record keeping requirements..." Revise the language in the appropriate SIU permits to reflect "grab sampling when composites are not feasible" or place another column on the second page of all SIU permits with "Sample Type" describing what type of samples should be taken under the different SIU circumstances.

**Solution: The revisions to the Industrial User Permits to include the above wording will be completed by November 30, 2011.**

(6) "If sampling performed by an Industrial user indicates a violation, the User shall notify the Control Authority within 24 hours of becoming aware of the violation.

**Solution: Tim Holt mailed a copy of the Industry Reporting requirements from 40 CFR 403.12(g)(2) to each of the permitted Industrial Users and reminding them of the requirement.**

(7) If NOV is a phone call, record of communication must be kept on file.

**Solution: Effectively immediately following the completion of the audit, Tim Holt began documenting each phone call via memo that is filed in each of the permitted users' files.**

(8) Under 40 CFR 403.12(j), "Notification of changed discharge. All Industrial users shall promptly notify Harrison in advance of any substantial change in volume or character of pollutants in their discharge...."

**Solution: Tim Holt mailed all industrial users a copy of 40 CFR 403.12(j) with reminder of the notification requirement.**

(9) Under 40 CFR 403.18(d), "Approval procedures for non-substantial modifications. (1) The POTW shall notify the Approval Authority of any non-substantial modification at least 45 days prior to implementation by the POTW, in a statement similar to that provided for in paragraph (c)(1) of this section." It was discovered during the Audit interview and checklist review the City is now sampling its industries once/month also. This office applauds the City's initiative. This is a non-substantial modification to the City's Pretreatment program, but ADEQ should have been notified.

**Solution: A letter was sent to Allen Gilliam, ADEQ, as notification of a temporary increase in random sampling by the City in order to insure that discharges are compliant with the IU's discharge limits.**

#### **(D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS**

(1) Finalize modifications to the City's Program to be current with 40 CFR 403. City Pretreatment personnel need to review its entire Program to identify other sections that need to be revised. A preliminary review of the City's Program modifications indicates it needs a few more correction/revisions to be approvable.

**Solution: Tim Holt has begun review of the Pretreatment Program to identify sections that need to be revised. The revisions to the Pretreatment Program are scheduled to be completed and submitted to Allen Gilliam, ADEQ, by December 31, 2011.**

(2) Include a section in the City's Pretreatment Program entitled "Technically Based Local Limits" demonstrating (with ADEQ supplied spreadsheets if desired) that local limits are not necessary at this time. Language in that section should also include a statement that the City's Director of Public Works will allocate the Maximum Allowable Industrial Loadings (MAILs) as deemed necessary if it appears pass-through and interference is being caused by the City's industrial users or if the City's influent loadings exceed 80% (suggested) of the Calculated Maximum Allowable Headwork's Loadings (MAHLs).

**Solution: Revisions to the City's Pretreatment Program to include "Technically Based Local Limits" information are scheduled to be completed and submitted to Allen Gilliam, ADEQ, by December 31, 2011.**

(3) Revise the City's Pretreatment Ordinance section 10.08.06(4) "Specific Pollutant Limitations" with language referencing the Pretreatment Program's "Technically Based Local Limits" section with language similar to, "Local Limits are developed, implemented and enforced to protect against pass-through and interference. No Industrial User shall discharge or caused to be discharged into the POTW any wastewater pollutant concentration exceeding the Technically Based Local Limits (TBLLs) developed from time to time by the Director of Public Works as required in City's NPDES permit, 40 CFR 403.5 (c) and approved by ADEQ. TBLLs (if necessary) based on calculated site specific Maximum Allowable Industrial Loadings are located in the City's Pretreatment Program. At the discretion of the Director of Public Works, TBLLs shall be allocated, be imposed and shall apply at the "monitoring point" described in the individual industrial wastewater discharge permits. All concentration limits for metals shall be in terms of "total" metals unless otherwise indicated. At the discretion of the Director of Public Works, mass limitations may be imposed in addition to or in place of concentration based TBLLs. The Manager may also develop BMPs in individual wastewater discharge permits, to implement specific pollutant limitations. Such BMPs shall be considered Local Limits and Pretreatment Standards. When new Local Limits are implemented or revised, the Director of Public Works will provide individual notice to parties who have requested such notice and an opportunity to respond, as set forth by 40 CFR 403.5(c)(3). This requirement of notice also applies when Local Limits are set on a case-by-case basis."

**Solution: The "Sewer Use" ordinance has been revised and is expected to be adopted by December 31, 2011.**

(4) Include Best Management Practice (BMP) violations and enforcement options in the City's current Enforcement Response Plan and Enforcement Response Guide.

**Solution: The "Sewer Use" ordinance has been revised and is expected to be adopted by December 31, 2011. Additionally, the City of Harrison has also developed a FOG program that is expected to be adopted by December 31, 2011.**

Sincerely,

  
Tim Holt

Pretreatment Coordinator  
City of Harrison



**CITY OF HARRISON**  
DEPARTMENT OF PUBLIC WORKS  
PRETREATMENT DEPARTMENT

10-27-2011

Allen Gilliam  
Engineer II  
ADEQ Water Division  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Dear Allen,

Please consider this letter notification of additional temporary sampling of Industrial User by the City of Harrison. With the change in personnel in the City of Harrison Wastewater Department random industrial sampling was added to collect additional samples for background purposes. This random sampling was simply a temporary method of checking to insure that IUs discharge during self-monitoring sampling events is consistent with their discharge during non-sampling times.

Additional random samples were collected over a 6 month period from May thru October, 2011. Random samples were consistent with the Industrial Users' self-monitoring samples during this period, so future random sampling will be decreased to quarterly from this point on.

If you have any questions or require any additional information feel free to contact me. Thank you.

Sincerely,

*sent via e-mail attachment*

Tim Holt  
Pretreatment Coordinator  
City of Harrison