

From: Gilliam, Allen
Sent: Monday, December 18, 2006 12:09 PM
To: 'Jessica Keahey'
Cc: 'Myra Taylor'; Bailey, John
Subject: Jonesboro TBLL development

Jessica,

As mentioned previously, this office has the spreadsheet that will calculate your max. allowable industrial loadings (MAIL), removal efficiencies included. But, I will supply you with "theoretical permit limits" based on protection of water quality for your information. Please allow this office some time to wrap up other "must complete" projects.

Previous topic: I've found in my "work" file for Jonesboro most correspondence explaining how the original technically based limits (TBLL) were derived back in '93. It is not possible to make that long story short but, it appears "local limits" were established on a equivalent concentration basis applicable for ALL SIUs, even those that did not even discharge elevated "pollutants of concern" (food related IUs discharging heavy metals above domestic background levels? Not a reality.) which was not per EPA guidance. This, in essence "penalized" the true metals'-type industries by allocating slices of the entire metal's "pie" (MAIL) even to those who don't need them. The "how and why" your local limits were approved by this agency at that time, I won't get into at this time.

I've also found, what I believe to be all the correspondence between ADEQ and Jonesboro (mostly McGoodwin/Williams and Yates docs) around the '97 dates that goes on to further state that technically based local limits (TBLL) have now been found to be not necessary except for Hg (See Jonesboro's Program appendix K, attachment 3, table 6). Subsequent effluent monitoring for that Hg showed non-detects over a period of time and other statements concerning "what to do" with that parameter are further explained.

I believe a better understanding of the approach in establishing the max allowable headworks loadings and the necessity of local limits had finally been recognized by '97.

Based on the current modified program I have in my office that was legally approved and incorporated into your NPDES permit, I'd feel safe in saying (true backsliding doesn't apply in pretreatment) you can legally remove your existing Cr and Ni "local limits" and fall back to the categorical ones where applicable. Please have documentation placed in each affected IU's file (fact sheets?).

This office would like to see your (CWL's) rationale statement to the affected IUs that their Cr and Ni limits have been modified to reflect the city's latest ('97) "local limits development".

More to come,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

-----Original Message-----

From: Jessica Keahey [mailto:jkeahey@mwyusa.com]
Sent: Thursday, December 14, 2006 2:24 PM
To: Gilliam, Allen
Subject: RE: TBLL development

Allen,
I'm fairly close to having calculated removal efficiencies. CWL is going to be conducting their domestic sampling soon, and along with their 2006 WWTP and IU flow data, I should be in a position soon to calculate the MAILs, etc. If you could provide me with the WQS or theoretical permit limits as you called them, that would be great... We visited Jonesboro last week, and they had not announced this new IU officially yet. It's something that will certainly be addressed as we go along. Thanks,

Jessica Keahey, EI
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-----Original Message-----

From: Gilliam, Allen [mailto:GILLIAM@adeq.state.ar.us]
Sent: Thursday, December 14, 2006 1:08 PM
To: Jessica Keahey
Cc: jonesboro myra taylor; Bailey, John
Subject: RE: TBLL development

Jessica,

Give me a little time to review what I've got in my files. Nothing comes to my mind immediately why Cr and Ni were targetted for local limits to be applied at their industries so I'll have to dig back in my old file info.

Also, if you're getting into it further, as in completely re-doing their MAHLs and necessity of local limits (TBLLs), we have a spreadsheet here that I can calculate MAHLs and MAILs (max allowable industrial loadings which is the MAHLs minus the domestic background loadings and a 10 to 20%

safety/growth factor). You won't need to know all the permit writers' formulae which calculate wq criteria, wasteload allocations or long term averages for your receiving stream in protecting water quality. I'll be able to give you jonesboro's "permit limits", as if they had to have them. Then it's a simple back calculation using existing removal efficiencies to come up with the MAHLs.

with a new facility moving into town, one that might fall under the pharmaceuticals category depending on what type of active ingredients they include in their mfging of lotions/creams, etc., Myra? If this place is on a dead run to construct and get under way, I'd be asking some pertinent questions about their raw materials, msds and all the other baseline info they would be required to submit under 403.12(b).

Will try and get the file out today Jessica,

Allen gilliam
Adeq state pretreatment coordinator
501.682.0625

-----Original Message-----

From: Jessica Keahey [mailto:jkeahey@mwyusa.com]
Sent: Monday, December 11, 2006 4:01 PM
To: Gilliam, Allen
Subject: FW: TBLL development

Allen,
I know at one point we had discussed the fact that Jonesboro has a Nickel and Chromium TBLL listed in their permit for categorical metal finishing processes for which they cannot account. Recently, Myra has found a resolution that the City passed for those values in 1993, along with a few other constituents. I have no idea how these were derived - they are not listed in the latest 1997 Pretreatment Program that MWY developed for them. Do you have any record of this business now that I have a little more specific dates? Also, if it's not on record with ADEQ, would there be a problem with "backsliding" in removing these "local limits" if they aren't needed? See Myra's email to me below. As far as I'm aware, only the Nickel and Chromium values are being applied in the permits.

Thanks,

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-----Original Message-----

From: Myra Taylor [mailto:mtaylor@jonesborocwl.org]
Sent: Monday, December 11, 2006 2:35 PM
To: Jessica Keahey
Subject: TBLL development

Jessica,
I have researched various correspondences from MWY, and ADEQ for the development of Ni/Cr TBLLs. The only letter I found with Ni/Cr listed as 1.03/1.08 mg/l is letter dated 11-3-93 to Chuck Bennett, Chief Water Division ADPC&E. It stated that a previous letter dated 10/18/93 had given conditional approval of the requested modification to our Pretreatment Program, which specifically references Cu/Zn TBLL changes. I found copies of the data used to establish Cu/Zn limits but nothing for Ni/Cr. The following TBLLs were adopted by resolution by the CWL Board on October 26, 1993:

Pollutant Parameter	Universal Concentration Limit mg/L
Cadmium (Total)	0.15
Chromium (Total)	1.08
Copper(Total)	0.153
Lead (Total)	1.20
Nickel(Total)	1.03
Zinc (Total)	2.45

I will fax you the letter and a copy of the Board's Resolution.

I hope this is helpful. Let me know if you need something else.

Thanks,
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