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Pretreatment/Consent Orders – Helping to Reach Compliance: Randy Bradley (Russellville City Corporation) Arkansas Water Works and Water Environment Association Presentation

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Randy Bradley undertook a presentation at the Arkansas Water Works and Water Environment Association annual meeting titled:

Pretreatment and Consent Orders – Helping to Reach Compliance (“Presentation”)

Mr. Bradley is Russellville City Corporation’s (“City Corporation”) Wastewater Operations Manager.

The Clean Water Act includes standards for facilities discharging wastewater directly into a jurisdictional waterbody (i.e., “direct dischargers”) and those whose effluent is routed to a Public Owned Treatment Works (“POTW”)(i.e., “indirect dischargers”).

The United States Environmental Protection Agency (“EPA”) established pretreatment standards that impose certain requirements on industrial indirect dischargers’ wastewater prior to introduction into a POTW. Their purpose is to prevent the discharge of pollutants that “pass through”, “interfere with”, or are otherwise “incompatible” and are not susceptible to treatment by the POTW.

The Arkansas Department of Environmental Quality (“ADEQ”) implements and enforces these standards as part of its receipt of delegation of the NPDES permitting program.

POTWs have a unique operational challenge. The wastewater they receive arises from off-site sources and varies in volume and characteristics. Sources of the POTWs influent will consist of many industrial, commercial and other facilities generating waste in the community.

Mr. Bradley’s *Presentation* noted that Arkansas POTWs pretreatment programs play an important part in a wastewater treatment plant’s ability to maintain compliance. His *Presentation* provided a history of Russellville City Corporation (“City Corporation”) ADEQ Consent Administrative Order (“CAO”) and how its pretreatment department assisted in some corrective actions.

The *Presentation* noted that the ADEQ issued CAO 09-146 to City Corporation in 2009. Mr. Bradley identified key factors that caused the CAO to be issued as:

- SSO’s
- Wastewater plant discharge violations – most related to excess flow

City Corporation submitted a Comprehensive Corrective Action Plan in January 2010 which included:

- Actions to find and reduce sources of I & I
- Addressing possible I & I from industrial sources

Actions City Corporation undertook included:

- Storm water questions included in routine industry inspection
- Meeting with all industries asking for assistance and removing any known source of I & I
- Cross-connection/backflow inspections looking for any source of I & I (found leak on fire system line leaking into manhole)

Results were stated to have included:

- Ammonia leak at a large industry – found its way to the treatment plant
- Businesses pumping storm water to their cleanout
- Parking lots, truck and trailer washouts
- Others

The *Presentation* notes that City Corporation's efforts are continuing:

- Compliance schedule in new discharge permit for local industry to remove all stormwater from facility (currently going to the collection system)
- Continue to educate businesses and industries on cost associated with stormwater going to collection system
- Continue looking

[A copy of the slides \(including photographs\) can be downloaded here.](#)