

March 23, 2018

Mr. Todd Blanc
Water Protection Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: 2017 CITY OF SPRINGFIELD ANNUAL PRETREATMENT REPORT

Dear Mr. Blanc:

Please find enclosed the City of Springfield, Missouri Pretreatment Program Annual Report for 2017 as required by 40 CFR 403.12(I) and our Missouri State Operating Permits.

We utilized the suggested format and incorporated attachments and additional information as necessary. A copy of the legal notice from the Springfield News-Leader is included that fulfills the public notification requirement found in 40 CFR 403.8(f) (2) (vii) whereby Industrial Users found to be in Significant Noncompliance (SNC) with Pretreatment Requirements in calendar year 2017 are listed. The notice was published in the Springfield News-Leader on February 22, 2018.

If you have any questions concerning the annual report please contact me at (417) 864-1490.

Sincerely,

**CITY OF SPRINGFIELD
ENVIRONMENTAL SERVICES**

John Waitman
Environmental Compliance Officer

Enclosure

2017 Annual Report

For The

City of Springfield, Missouri Industrial Pretreatment Program

Northwest Cleanwater Treatment Plant MO-0103039 & Southwest Cleanwater Treatment Plant MO-0049522

I certify, under penalty of law, that the information in this report was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluation the information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Signature

Environmental Compliance Officer
Title

March 15, 2018
Date

Duly Authorized--40 CFR 403.12(m). If this report is not signed by a principal executive officer or ranking elected official, then it must be signed by a duly authorized employee. This report is required to be submitted as specified in the Missouri.

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City of Springfield
MO-0103039 & MO-0049522
Pretreatment Program Annual Report
Calendar Year 2017

The Environmental Protection Agency's (EPA) pretreatment regulations require approved Publicly-Owned Treatment Works (POTW) pretreatment programs to file an annual report [see 40 CFR 403.12(i)] to the Missouri Department of Natural Resources to document program status and activities performed during the previous calendar year. Missouri requests information during the previous calendar year from January 1 to December 31. Using the attached table (Part II) please provide a list of all Significant Industrial Users and the other requested information for those facilities regulated by your Pretreatment Program. If any facility was in Significant Noncompliance (SNC) during a six month reporting period be sure to indicate whether this was for a violation of discharge standards, reporting, or both. If these data are kept by you in a spreadsheet or database, a printout can be substituted for the table.

Part I: With respect to the industries regulated under the City's Pretreatment Program, please answer the following questions. Use additional paper if necessary.

1. List by name, those SIUs that did not have a valid control mechanism (i.e. expired or unissued) as of December 31, 2017. Of these industries, indicate those that have been without a control mechanism for greater than 180 days. If your approved Pretreatment program does not require you to issue permits, please indicate.

All SIUs required to have a valid control mechanism as of December 31, 2017 were permitted with a valid City of Springfield permit with the exception of Elemoose and LKQ Remanufacturing. Elemoose is a Zero Discharge metal finishing facility which was inspected in 2017 and permitted on February 28, 2018. LKQ Remanufacturing is a metal finishing facility that was inspected in 2017 and permitted on January 04, 2018.

2. List by name those SIUs not sampled by the POTW at least once during calendar year 2017.

All SIUs that discharged to the POTW were sampled by the POTW at least once during calendar year 2017. Most SIUs were sampled more frequently.

3. List by name those SIUs on a compliance schedule as of December 31, 2017, for achieving compliance with discharge standards. Provide the date of projected final compliance. Indicate those facilities currently in violation of any compliance schedule milestones by 90 days or greater.

No SIUs in violation of compliance schedule as of December 31, 2017.

4. List by name those industries for which civil or criminal judicial actions were initiated in the past year. Indicate the amount of any proposed penalties and the amount of penalties collected.

No industry civil or criminal actions were initiated during 2017 for industries. No penalties were proposed or collected during 2017.

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5. List by name those industries for which written Notices of Violation (NOV), Administrative Orders (AO) or the equivalent, were issued in response to noncompliance events that occurred in the past calendar year. For each industry indicate the total number of each enforcement action type and the amount of penalties collected, if any.

NAME	NUMBER OF ACTIONS TAKEN	ACTION TAKEN
C & S Manufacturing	1	NOV - Copper daily limit
Central States Industrial	2	NOV – Nickel daily limit & monthly average (1)
		NOV – pH daily limit (1)
Custom Powder Systems	2	NOV - Reporting
Erickson Transport Corporation	1	NOV – Mercury daily limit (1)
Glanbia Nutritionals	4	NOV- Zinc daily limit (3)
		NOV - Reporting
Holloway America	2	NOV – Copper daily limit & monthly avg. (1)
		NOV – Chromium daily limit (1)
Kemin Industries	1	NOV - Reporting
LKQ Remanufacturing	1	NOV- Zinc daily limit
Milky Way Transport	1	NOV – pH daily limit
Multi-Craft Contractors	8	NOV- Reporting (3)
		Administrative Order- SNC
		Show Cause Meeting- SNC 1st ½ 2017
		Administrative Order- SNC
		Show Cause Meeting- SNC 2nd ½ 2017
		Legal Notice
Nabors Landfill	3	NOV – Reporting (2)
Rock-Tenn	3	NOV - Mercury daily limit
SRC - Heavy Duty	18	NOV- Reporting (5)
		NOV- Zinc daily limit (6), monthly average (4)
		Administrative Order- SNC
		Show Cause Meeting- SNC 2nd ½ 2017
		Legal Notice
Stainless Fabrication	1	NOV- Nickel monthly average
	- CIU	
	- Non Categorical SIU	
	- IU	

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No monetary penalties proposed or collected in 2017 from any industry by the City of Springfield.

6. List by name those industries who were in Significant Noncompliance (SNC) at any time during the calendar year and public noticed in the largest local newspaper. Provide the date of publication. If publication has not yet occurred, please provide the expected date of publication.

LEGAL NOTICE

As required by Section 120-10 of the Springfield City Code, the following is a list of industries that were in violation of Chapter 120 of the Springfield City Code in 2017. These industries discharged to the publicly owned treatment works of Springfield, Missouri:

Multi-Craft Contractors, Inc.
2810 N Le Compte Road
Springfield, MO 65803

Springfield Remanufacturing Corp.
650 N Broadview Place
Springfield, MO 65802

A public notice was published in the Springfield News-Leader on February 22, 2018.

7. Did the POTW have any numerical NPDES violations in 2017? If so, describe.

No violations at either treatment plant in 2017

Southwest Plant		Month	Northwest Plant	
001	002		001	002
0	0	January	0	0
0	0	February	0	0
0	0	March	0	0
0	0	April	0	0
0	0	May	0	0
0	0	June	0	0
0	0	July	0	0
0	0	August	0	0
0	0	September	0	0
0	0	October	0	0
0	0	November	0	0
0	0	December	0	0

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Were any NPDES violations attributed to interference or pass through?

Northwest Treatment Plant- No violations

Southwest Treatment Plant- No violations

8. List by name any industry that caused:

- (a) interference at the POTW
- (b) pass through of pollutants at the WWTP
- (c) health problems to POTW workers
- (d) water quality violations (violation of city's NPDES permit).

None to our knowledge

For each industry provide details including information on enforcement actions taken by the city to resolve the violations.

Not Applicable

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	CIUS	NON- CAT SIUS	NON- SIUIUS	TOTAL
PERMITTING				
Total IUs	29	17	31	77
Active Control Documents	27	17	11	55
COMPLIANCE:				
Total IUs in SNC	2	0	0	2
IUs in SNC for Discharge Standards	1	0	0	1
IUs in SNC for Reporting	1	0	0	1
IUs in SNC for Compliance Schedule	0	0	0	0
IUs in SNC for Other Reasons	0	0	0	0
MONITORING				
Sampling Parameters Analyzed by POTW	3,846	839	876	5,561
Site Inspections Conducted by POTW	28	13	23	64
IUs Sampled	25	16	25	66
IUs Inspected	28	13	23	64
ENFORCEMENT				
IUs Subject to Enforcement Action	9	3	2	14
NOVs Issued	20	5	4	29
Administrative Orders Issued	0	0	0	0
Show Cause Hearings	2	0	0	2
Compliance Schedules Issued	0	0	0	0
Civil Suits Filed	0	0	0	0
Criminal Suits Filed	0	0	0	0
Penalties Collected	0	0	0	0
IUs Published in Newspaper	2	0	0	2
Other Actions- Consent Order	0	0	0	0

I certify, under penalty of law, that the information in this report was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluation the information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Signature

Environmental Compliance Officer
Title

March 23, 2018
Date

2017 Pretreatment Program Annual Report

PART II: FILE AND RECORDS REVIEW

INSTRUCTIONS: Please use the following table to list the industrial user (IU) name, address, categorical standard, and regulated process in your approved pretreatment program. Note: **Below the table, please provide an explanation of IU deletions, and list of IU additions from the previous report.**

Below is a guide to the information sought by the table and suggested abbreviations.

INDUSTRY: Provide the name and address of each industrial user regulated under the pretreatment program. *Note: Please provide the address for each industry on the table on a separate sheet.*

Reduced Reporting or NSCIU: List all IUs subject to categorical pretreatment standards that are subject to reduced reporting requirements under 40 CFR 403.12(e)(3) with "RR" and identify which IUs are Non-Significant Categorical IUs (NSCIU), using "NSCIU."

Local Limits: As per 403.12(i), indicate whether for each CIU discharging to a POTW (including non-domestic wastewater delivered by truck, rail, and dedicated pipe or other means of transportation) is subject to one or more local limits that are more stringent than the applicable categorical standards. "Y" = yes, "N" = no, SIU only subject to local limits, list NA.

CAT STND: Provide the categorical standard code number. For example, industries subject to the Metal Finishing regulation should be designated "433." For noncategorical industries indicate "NA" in this column.

REGULATED PROCESS: Indicate what process the industry performs to qualify for inclusion in the pretreatment program. For example, if an industry is subject to Metal Finishing regulations because it performs zinc and chromium plating indicate with "ZnCrPL" or a similar abbreviation.

TMT: If the facility treats its wastestream(s) indicate "Y." If no treatment is provided indicate "N."

TYPE: Indicate the type of pretreatment system (if applicable) the industry has. Suggested abbreviations: "precip" for precipitation/clarification; "precip/flt" for precipitation followed by filtration; "DAF" for dissolved air flotation; etc.

REG (regulated) FLOW: Provide the industry's regulated average daily flow for its regulated processes in gallons per day. The abbreviation "K" stands for 1000. List each regulated flow separately in separate rows on the table. Average all flow values provided by the permittee over the 12 month period and report in gallons per day.

TOT FLOW: Provide the average daily total plant flow in gallons per day. Total flow for all regulated processes over 12 month period. If using the combined waste stream formula.

CWF: Indicate if the industry uses the Combined Wastestream Formula to determine compliance with categorical standards. "Y" = yes, "N" = no.

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COMPLIANCE STATUS FOR THE 6 MO PERIOD ENDING:

For the six month periods listed, indicate if the industry's compliance status. Use the following abbreviations:

C	In compliance with all standards: no violations.
I	Infrequent noncompliance with discharge standards: the facility had some violations but not severe enough to be considered in significant noncompliance.
SNC,S	In significant noncompliance with discharge standards.
SNC,R	In significant noncompliance with reporting requirements: the industry failed by greater than 30 days to submit reports as required.
SNC,M	In significant noncompliance with self monitoring requirements: the industry did not properly report its compliance status on its self monitoring report.
SNC,C	Failure to meet a compliance schedule milestone by 90 days.

LAST INSPECTION: Date of the last inspection performed by the POTW.