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Alabama Department of Environmental Management  
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FEBRUARY 3, 2020

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(334) 271-7700 ■ FAX (334) 271-7950

HONORABLE JOE LEE  
MAYOR/ CHAIRMAN OF THE MOODY GUSC BOARD  
POST OFFICE BOX 730  
MOODY AL 35004

Re: DRAFT LOCAL LIMITS  
MOODY GOVERNMENTAL UTILITY SERVICES CORPORATION  
HWY 411 WWTP  
NPDES PERMIT NO. AL0055255

Dear Mayor Lee:

The Alabama Department of Environmental Management transmitted proposed local limits documents for your review on October 16, 2018. Following that review, the Moody GUSC Board advised ADEM of their intention to establish a sampling program to collect site-specific data related to the operation of the Hwy 411 WWTP. As of this date, ADEM has not received results from that sampling effort.

This letter is to request that sampling results be submitted to ADEM no later than 30 days from the date of this letter. Alternately, if sampling is no longer proposed we request notification of that decision within the same time period. If sampling results are not received, ADEM proposes to proceed with the public notice of local limits as drafted. In this regard, please review the attached documents as there may have been minor changes since your initial draft was developed.

Should you have any questions about this process, please contact Alex Chavers by email at [achavers@adem.alabama.gov](mailto:achavers@adem.alabama.gov) or by phone at (334) 271-7851.

Sincerely,

A handwritten signature in black ink, appearing to be "S Ramsey", enclosed in a circular scribble.

Scott Ramsey, Chief  
Industrial Section  
Industrial/Municipal Branch  
Water Division

Attachments: Draft Local Limits  
Rationale for Local Limits  
Local Limits/Pass Through Calculations  
List of Significant Industrial Users

CC: Vulcan Industries  
Dustin Stokes  
Alex Chavers

**Birmingham Branch**  
110 Vulcan Road  
Birmingham, AL 35209-4702  
(205) 942-6168  
(205) 941-1603 (FAX)

**Decatur Branch**  
2715 Sandlin Road, S.W.  
Decatur, AL 35603-1333  
(256) 353-1713  
(256) 340-9359 (FAX)



**Mobile Branch**  
2204 Perimeter Road  
Mobile, AL 36615-1131  
(251) 450-3400  
(251) 479-2593 (FAX)

**Mobile-Coastal**  
3664 Dauphin Street, Suite B  
Mobile, AL 36608  
(251) 304-1176  
(251) 304-1189 (FAX)

# LOCAL LIMITS

**PUBLICLY OWNED TREATMENT WORKS:** HWY 411 WWTP  
**LOCATION:** MOODY, ALABAMA  
ST CLAIR COUNTY  
**PERMIT NUMBER:** AL0055255

## GENERAL PRETREATMENT PROHIBITIONS

No discharge to the Publicly Owned Treatment Works (POTW) shall exceed or otherwise violate the General Pretreatment Standards described in ADEM Administrative Code 335-6-5. Specifically the POTW shall ensure that discharges to their system comply with the following prohibitions to ensure protection of the treatment and collections systems and to ensure worker safety:

Pollutants which create a fire or explosion hazard including but not limited to waste streams with a closed cup flashpoint of less than 140 degrees Fahrenheit;

Pollutants which will cause corrosive structural damage to the treatment works but in no case discharges with a pH lower than 5.0 S.U. unless the treatment works are specifically designed to accommodate such discharges;

Solid or viscous pollutants in amounts which will cause obstruction to the flow in sewers or other interference with the operation of the treatment works;

Any pollutant, including oxygen demanding pollutants released in a discharge of such volume or strength as to cause interference in the treatment works;

Heat in amounts which will inhibit biological activity in the treatment plant resulting in interference, but in no case in such quantities that the temperature of the effluent at the treatment plant exceeds 104 degrees Fahrenheit unless the treatment plant is designed to accommodate such heat;

Pollutants which will result in the presence of toxic gases, vapors or fumes within the treatment works in a quantity that may cause acute worker health and safety problems;

Any trucked or hauled pollutants except at discharge points designated by the treatment works; and

Petroleum oil, nonbiodegradable cutting oil, or products of mineral origin in such amounts that will cause interference or pass through.

## GENERAL PRETREATMENT STANDARDS AND LOCAL LIMITS

### POLLUTANTS:

The total average daily loading of the substances from all sources shall not exceed the indicated mass listed below.

<u>Parameter</u>	<u>Allowable Average Daily Pollutant Load at Headworks of POTW</u> (lbs/day)
Arsenic, Total Recoverable	0.0338
Cadmium, Total Recoverable	0.0250
Chromium, Total Recoverable	15.53
Copper, Total Recoverable	1.306
Cyanide, Free	0.1329
Lead, Total Recoverable	0.2482
Mercury, Total Recoverable	0.0008
Nickel, Total Recoverable	1.4068
Silver, Total Recoverable	0.1019
Zinc, Total Recoverable	7.923

No future loading above the domestic wastewater concentration of Cyanide or Lead will be allowed. All new or expanding industrial dischargers containing these pollutants shall be limited as indicated below:

<u>Parameter</u>	<u>Allowable Average Concentration</u> (mg/l)
Cyanide, Free	0.04
Lead, Total Recoverable	0.05

**HYDRAULIC LOADING:**

The hydraulic loading on an average basis is the design capacity of the treatment plant which is 0.95 million gallons per day.

**ORGANIC LOADING:**

The organic loading (CBOD<sub>5</sub>) is the design capacity of the treatment plant which is 1323 pounds per day.

**SOLIDS LOADING**

The Total Suspended Solids loading (TSS) is the design capacity of the treatment plant which is 1584 pounds per day.

**EFFECTIVE DATE:**

**ISSUANCE DATE:**

**DRAFT**

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**Alabama Department of Environmental Management**

## Rationale for Local Limits

HWY 411WWTP (AL0055255)  
0.95 MGD activated sludge facility  
Moody / St Clair County

Reissuance  
Prepared Date: 9/26/2018  
Prepared By: Ed Hughes  
Updated: 1/28/2020

### Nonconventional Pollutants:

#### Pass Through:

Allowable pollutant loadings were based on state water quality standards applicable to streams with a use designation of Fish & Wildlife. Local limits calculations were performed using a receiving stream 7Q10 of 0.0 cfs, 1Q10 of 0.0 cfs, an annual average flow of 9.9 cfs and a stream hardness of 100 mg/l as CaCO<sub>3</sub>. The treatment plant removal rates and untreated domestic sewage pollutant concentrations were based on Best Professional Judgment using literature values and EPA recommended levels as the basis unless site specific data was available. Calculations estimate the allowable quantity of heavy metals (measured as Total Recoverable) and Free Cyanide that can be discharged into the POTW to ensure that state water quality standards for aquatic toxicity and human health criteria are met in the receiving stream during critical flow conditions. Because only the portion of heavy metals present in dissolved form is "bioavailable" to aquatic life, the calculations which evaluate aquatic toxicity take into account the relationship between "dissolved" metals and metals measured using the Total Recoverable test procedure. The allowable pollutant loadings based on pass through concerns are located in column 11 of the Local Limits-Pass Through (LL-PT) spreadsheet.

#### Interference:

The Department evaluated the potential for processes at the POTW to be inhibited as result of the pollutant loading entering the treatment works. Inhibition values were based on Best Professional Judgment using literature values and EPA recommended levels as the basis unless site specific information was provided by the POTW. The allowable pollutant loadings based on inhibition concerns are located in column 13 of the LL-PT spreadsheet.

#### Sludge Disposal:

The POTW disposes of sludge by landfilling. For POTWs that use land application as a means of disposal the LL-PT spreadsheet calculates the allowable pollutant loading to ensure that metal concentrations in the sludge comply with EPA 503 regulations for land application of biosolids. The results of these calculations are located in column 14 of the spreadsheet.

Column 15 of the LL-PT spreadsheet indicates the most stringent of the above three criteria. These loadings are considered the POTW's total headworks capacity for the pollutants of concern.

The LL-PT spreadsheet also lists the current loading of the pollutants of concern from domestic/commercial and industrial sources and determines the remaining capacity currently available. Domestic/commercial loadings are indicated in Columns 16 and current industrial loadings are shown in column 17 (a listing of each significant industrial user and their permit limits and average reported discharge level for pollutants

without permit limits is shown on the attached Significant Industrial Users sheet). Column 18 of that spreadsheet shows the remaining capacity after subtracting the current loadings. Negative values indicate that no additional capacity is available for these pollutants. Specifically, these calculations estimate that no additional loading of Cyanide or Lead above the domestic sewage concentration can be allowed; therefore, new and expanded discharges shall be limited to domestic sewage concentrations.

The limiting factor for each of these pollutants is shown below:

<u>Parameter</u>	<u>Limiting Factor</u>
Cyanide, Free	Water Quality
Lead, Total Recoverable	Water Quality

It should be noted that the available pollutant loadings shown in column 18 have been reduced by 10%, which is the percent of total capacity reserved for future growth.

### Conventional Pollutants

#### Temperature:

The Department is not aware of any specific circumstances related to this POTW which require a temperature limitation more stringent than general standards and prohibitions contained in ADEM Administrative code 335-6-5-.03(2)(e).

#### pH:

The Department is not aware of any specific circumstances related to this POTW which require a minimum pH limitation more stringent than general standards and prohibitions contained in ADEM Administrative code 335-6-5-.03(2)(b).

#### Hydraulic loading:

The hydraulic loading is the design capacity of the treatment plant as indicated by the POTW, 0.95 MGD.

#### Organic loading:

The organic loading (CBOD<sub>5</sub>) is the design capacity of the treatment plant. This loading was calculated using the design flow of the POTW and an influent CBOD<sub>5</sub> concentration of 167 mg/l.

#### Total Suspended Solids loading

The Total Suspended Solids (TSS) loading was calculated using the design flow of the POTW and an influent TSS concentration of 200 mg/l.

While ADEM develops local limits and reviews compliance, POTWs are responsible for ensuring proper management of Significant Industrial Users and other sources to meet their NPDES limits and to prevent pass through and interference problems and to ensure compliance with the prohibitions contained in ADEM Administrative Code 335-6-5-.03 for protection of the treatment works, collection system and worker safety. The POTWs' responsibilities include establishing any additional limitations via local ordinances, etc. to protect the POTW and comply with their permit.

**LOCAL LIMIT/ PASS THROUGH CALCULATIONS**

POTW NAME: **Moody Highway 411 WWTP**  
 NPDES PERMIT NUMBER: **AL0055255**

REVISED DATE: **4/5/2019**  
 PREPARED BY: **Ed Hughes**

STREAM DATA AND POTW FLOW DATA					
RECEIVING STREAM CLASSIFICATION	=	F & W	0	RECEIVING STREAM TIDALLY INFLUENCED =	No
POTW DESIGN FLOW	=		0.95 MGD		
FLOW FROM OTHER CONTRIBUTORS	=		MGD		
DOMESTIC FLOW	=		0.9485 MGD		
7Q10	=		0 CFS	OR	0.00 MGD
1Q10	=		0.00 CFS	OR	0.00 MGD
7Q2	=		CFS	OR	0.00 MGD
ANNUAL AVG FLOW	=		9.9 CFS	OR	6.40 MGD
STREAM HARDNESS (DEFAULT VALUE 100)	=		100 MG/L AS CaCO3		

ALLOWABLE LOADING TO STREAM BASED ON WATER QUALITY AND HH STANDARDS										
PARAMETER	1) CHRONIC	SW CHRONIC	2) MAX W Q	3) ACUTE	SW ACUTE	4) MAX W O	5) HUMAN	6) MAX W O	7) WQ / HH	PARAMETER
	TOXICITY (MG/L)	TOXICITY (MG/L)	INSTREAM (LBS/D)	TOXICITY (MG/L)	TOXICITY (MG/L)	INSTREAM (LBS/D)	HEALTH (MG/L)	INSTREAM (LBS/D)	BASED DISC LEVEL (LBS/D)	
ANTIMONY, TOTAL RECOVERABLE	----	----	----	----	----	----	0.3733333	2.958	2.958	ANTIMONY, TR
ARSENIC, TRIVALENT	0.1500	----	1.188	0.3400	----	2.694	0.00030	0.019	0.019	ARSENIC, TRI
CADMIUM, TOT RECOVERABLE	0.0002	----	0.008	0.0020	----	0.068	----	----	0.008	CADMIUM, TR
CHROMIUM, TOT RECOVERABLE	0.0741	----	2.796	0.5698	----	21.496	----	----	2.796	CHROMIUM, TR
CHROMIUM, HEXVALENT	0.0110	----	0.087	0.0160	----	0.127	----	----	0.087	CHROMIUM, HEX
COPPER, TOTAL RECOVERABLE	0.0090	----	0.183	0.0134	----	0.274	----	----	0.183	COPPER, TR
CYANIDE, FREE	0.0052	----	0.041	0.0220	----	0.174	9.3333	73.95	0.041	CYANIDE, FREE
LEAD, TOT RECOVERABLE	0.0025	----	0.097	0.0646	----	2.484	----	----	0.097	LEAD, TR
MERCURY, TOT RECOVERABLE	0.000012	----	0.000	0.0024	----	0.063	0.0000424	0.000	0.00031	MERCURY, TR
MOLYBDENUM	----	----	----	----	----	----	----	----	----	MOLYBDENUM
NICKEL, TOT RECOVERABLE	0.0520	----	0.816	0.4682	----	7.346	0.9929078	7.867	0.816	NICKEL, TR
SELENIUM, TOTAL RECOVERABLE	0.0005	----	0.004	0.0020	----	0.016	2.4305556	19.257	0.004	SELENIUM, TR
SILVER, TOT RECOVERABLE	----	----	----	0.0032	----	0.025	----	----	0.025	SILVER, TR
ZINC, TOT RECOVERABLE	0.1181	----	2.836	0.1172	----	2.813	14.8936170	118.00	2.813	ZINC, TR

		Antimony	Arsenic	Cadmium	Chromium, To	Chromium, VI	Copper	Cyanide	Lead	Mercury	Molybdenum	Nickel	
DOMESTIC	DATA VALUE	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
	LIT VALUE	0.0010	0.0010	0.0030	0.0500	0.0000	0.0600	0.0400	0.0500	0.0000	0.0000	0.0200	
		Selenium	Silver	Zinc									
	DATA VALUE	0.0000	0.0000	0.0000									
	LIT VALUE	0.0000	0.0100	0.1800									

TYPE OF TREATMENT =	2	Act Sludge
TREATMENT INCLUDE NITIFICATION?	No	

SLUDGE DISPOSAL	
DOES THE POTW HAVE SECONDARY CLARIFICATION?	Yes
AVERAGE TONS OF SLUDGE PER DAY (DRY WEIGHT)	N/A
IS SLUDGE LAND APPLIED?	No

GROWTH ALLOCATION	
% ALLOCATION RESERVED FOR FUTURE GROWTH =	10

PARAMETER	7) MAX WQ INSTREAM (LBS/D)	8) ALLOCATION FROM BACKGROUND (LBS/D)	9) ALLOWABLE DISC FROM POTW (LBS/D)	10) REMOVAL RATE (%)	11) ALLOWABLE DISCHARGE (WQ / HH) (LBS/D)	12) INHIBITION TRESHOLD CONC (MGL)	13) ALLOWABLE DISCHARGE (INHIBITION) (LBS/D)	14) ALLOWABLE DISCHARGE (SLUDGE) (LBS/D)	15) ALLOWABLE DISCHARGE LOCAL LIMIT (LBS/D)	16) DOMESTIC INFLUENT LOADING (LBS/D)	17) INDUSTRIAL INFLUENT LOADING (LBS/D)	18) AVAILABLE CAPACITY FOR GROWTH (LBS/D)	LIMITING FACTOR
ANTIMONY, TOTAL RECOVERABLE	2.9579	0	2.9579	0	2.9579				2.9579	0.0079	0.0000	2.6550	WATER QUALITY
ARSENIC, TRIVALENT	0.0186	0	0.0186	45	0.0338	0.100	0.7923	-----	0.0338	0.0079	0.0000	0.0233	WATER QUALITY
CADMIUM, TOT RECOVERABLE	0.0083	0	0.0083	67	0.0250	1.000	7.9230	-----	0.0250	0.0237	0.0009	0.0004	WATER QUALITY
CHROMIUM, TOT RECOVERABLE	2.7962	0	2.7962	82	15.5346	5.000	39.6150	-----	15.5346	0.3955	0.0214	13.6060	WATER QUALITY
CHROMIUM, HEXVALENT	0.0872	0	0.0872	83	0.5127	1.000	7.9230	-----	0.5127	0.0000	0.0000	0.4614	WATER QUALITY
COPPER, TOTAL RECOVERABLE	0.1829	0	0.1829	86	1.3063	1.000	7.9230	-----	1.3063	0.4746	0.0259	0.7252	WATER QUALITY
CYANIDE, FREE	0.0412	0	0.0412	69	0.1329	0.100	0.7923	-----	0.1329	0.3164	0.0005	-0.1656	WATER QUALITY
LEAD, TOT RECOVERABLE	0.0968	0	0.0968	61	0.2482	1.000	7.9230	-----	0.2482	0.3955	0.0033	-0.1355	WATER QUALITY
MERCURY, TOT RECOVERABLE	0.0003	0	0.0003	60	0.0008	0.100	0.7923	-----	0.0008	0.0000	0.0000	0.0007	WATER QUALITY
MOLYBDENUM		0						-----	0.0000	0.0000	0.0000	-----	-----
NICKEL, TOT RECOVERABLE	0.8159	0	0.8159	42	1.4068	1.000	7.9230	-----	1.4068	0.1582	0.0298	1.0969	WATER QUALITY
SELENIUM	0.0040	0	0.0040	50	0.0079			-----	0.0079	0.0000	0.0000	0.0071	WATER QUALITY
SILVER, TOT RECOVERABLE	0.0255	0	0.0255	75	0.1019	0.250	1.9808	-----	0.1019	0.0791	0.0030	0.0179	WATER QUALITY
ZINC, TOT RECOVERABLE	2.8134	0	2.8134	79	13.3971	1.000	7.9230	-----	7.9230	1.4239	0.0185	5.8325	INHIBITION

## Comments

Item 1: Allowable concentration instream based on above noted stream conditions and state standard to protect aquatic life from chronic toxicity.

Item 2: Mass of pollutant allowed instream based on above noted stream conditions and chronic criteria calculated as shown below:

Item 2 = stream 7Q10 x 8.34 x Item 1. If stream segment is tidally influenced, the more stringent of freshwater and saltwater criteria is used.

Item 3: Allowable concentration instream based above noted stream conditions and state standard to protect aquatic life from acute toxicity.

Item 4: Mass of pollutant allowed instream based on above noted stream conditions and acute criteria and calculated as shown below:

Item 4 = stream 1Q10 x 8.34 x Item 3. For LWF streams, Item 4 = stream 7Q2 x 8.34 x Item 3.

If stream segment is tidally influenced, the more stringent of freshwater and saltwater criteria is used.

Item 5: Allowable concentration instream based on above noted stream conditions and state human health standard for a stream with this use classification.

Item 6: Mass of pollutant allowed instream based on above noted stream condition, the human health standard and calculated as shown below:

Item 6 = Annual average stream flow x 8.34 x Item 5 (for carcinogens) and 7Q10 x 8.34 x Item 5 (for non-carcinogens).

Item 7: The most stringent of the requirements calculated in Items 2,4 and 6.

Item 8: Amount allocated to other facilities discharging to this stream segment.

Item 9: Remaining allocation available.

Item 10: Pollutant removal rates based on the treatment process.

Item 11: The calculated allowable discharge into the POTW based on water quality and human health concerns.

Item 12: Concentration of pollutant that could cause inhibition of biological processes utilized at the treatment plant.

Item 13: Allowable discharge into the POTW based on levels to prevent inhibition of biological treatment processes.

Item 14: Allowable discharge into the POTW based on levels to meet EPA 503 standards for land application of sludge, if sludge is land applied.

Item 15: Allowable discharge into the POTW based on the more stringent of Items 11, Item 13 and item 14 requirements. This column contains the Local Limits for this POTW.

Item 16: Domestic influent (lbs/d) based on domestic flow and sampled domestic influent data if available or literature values if not.

Item 17: Industrial influent (lbs/d) based on monthly average permit limits and actual average values for the past 2 to 5 years (depending on availability) for "monitor only" pollutants as shown on SIUs sheet. Values reported as less than detect are not included in average calculation.



Item 18: Available capacity remaining for new sources after subtracting capacity being utilized by industrial sources, domestic sources (including commercial sources and septage disposal) and capacity reserved for future growth.

## SIGNIFICANT INDUSTRIAL USERS

PERMITTEE	AVG FLOW (MGD)	DAILY AVG ANTIMONY (MG/L)	DAILY AVG ARSENIC (MG/L)	DAILY AVG CADMIUM (MG/L)	DAILY AVG CHROMIUM (MG/L)	DAILY AVG HEX CHROM (MG/L)	DAILY AVG COPPER (MG/L)	DAILY AVG CYANIDE (MG/L)	DAILY AVG LEAD (MG/L)	DAILY AVG MERCURY (MG/L)	DAILY AVG Molybdenum (mg/l)	DAILY AVG NICKEL (MG/L)	DAILY AVG SELENIUM (MG/L)	DAILY AVG SILVER (MG/L)	DAILY AVG ZINC (MG/L)
Vulcan Industries (U355800158)	<b>0.0015</b>	0.0000	0.0000	<b>0.0700</b>	<b>1.7100</b>	0.0000	<b>2.0700</b>	<b>0.0400</b>	<b>0.2600</b>	0.0000	0.0000	<b>2.3800</b>	0.0000	<b>0.2400</b>	<b>1.4800</b>
Total Industrial flow	<b>0.0015</b>														

Monthly average permit limits are listed in bold print.

Other values are based on a minimum of 24 months of data if available as reported on DMRs (for parameters with testing requirements in permits).

PERMITTEE	AVG FLOW (MGD)	DAILY AVG ANTIMONY (LBS/D)	DAILY AVG ARSENIC (LBS/D)	DAILY AVG CADMIUM (LBS/D)	DAILY AVG CHROMIUM (LBS/D)	DAILY AVG HEX CHROM (LBS/D)	DAILY AVG COPPER (LBS/D)	DAILY AVG CYANIDE (LBS/D)	DAILY AVG LEAD (LBS/D)	DAILY AVG MERCURY (LBS/D)	DAILY AVG Molybdenum (LBS/D)	DAILY AVG NICKEL (LBS/D)	DAILY AVG SELENIUM (LBS/D)	DAILY AVG SILVER (LBS/D)	DAILY AVG ZINC (LBS/D)
Vulcan Industries (IU355800158)	0.0015	0.0000	0.0000	0.0009	0.0214	0.0000	0.0259	0.0005	0.0033	0.0000	0.0000	0.0298	0.0000	0.0030	0.0185
	0.0015	0.0000	0.0000	0.0009	0.0214	0.0000	0.0259	0.0005	0.0033	0.0000	0.0000	0.0298	0.0000	0.0030	0.0185

### CURRENT PERMITTED INDUSTRIAL LOADING TO POTW (LBS/DAY)

PARAMETER	
ANTIMONY	0.0000
ARSENIC	0.0000
CADMIUM	0.0009
CHROMIUM	0.0214
HEX CHROM	0.0000
COPPER	0.0259
CYANIDE	0.0005
LEAD	0.0033
MERCURY	0.0000
Molybdenum	0.0000
NICKEL	0.0298
SELENIUM	0.0000
SILVER	0.0030
ZINC	0.0185