

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Fort Smith

AFIN Number: 66-00226

NPDES Permit Number(s): AR0021750 and AR0033278

Program Tracked under NPDES Permit Number: AR0021750

Fact Sheet Preparation Date: 08-30-2000

Date of Last PCI/Audit: September 2004

Date of Last Annual Report: 09-12-06

Name of Inspector: Jeff Tyler and David Long, Region 6 EPA

Date PCI Performed: 11-15-06

Name, Title, and Telephone Number of Facility Representative:
Randy Easley / Environmental Manager / 479-784-2337

Name and Title of Other Participants: _____
John Beard / Environmental Coordinator / 479-784-2331

Number of IUs Visited: 1

Name(s) of IUs Visited: McCourt Manufacturing

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. None

2. Has ADEQ or EPA been notified of these changes? N/A

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes

4. What procedures are being used to update the IU Survey?
The City mails out surveys and utilizes the phone book.
City also reviews building permits and water usage records.

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 21

6. Number of Categorical Industrial Users: 10

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Federal Register, EPA and State assistance

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

| Name of IU: | Category: | Regulated Process: |
|-----------------------|-------------------|----------------------|
| Qual-Serve | Metal finishing | phosphating |
| CopperFab, Inc. | Metal finishing | phosphating |
| Flanders Industries | Metal finishing | phosphating |
| Fort Smith Plating | Electroplating | Zn & nickel plating |
| GNB Industrial Power | Battery mfg. | Re:City fact sheet |
| Hickory Springs Mfg. | Metal finishing | phosphating |
| Quanex, MacSteel | Iron & steel mfg. | Casting, hot forming |
| Rheem Mfg. | Metal finishing | phosphating |
| Southern Steel & Wire | Metal finishing | phosphating |
| Trane | Metal finishing | phosphating |

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes

2. Describe any apparent problems with the local limits.
None

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

| Pollutant: | Frequency: | Requirement in | | Comments: |
|------------|-------------|----------------|------------------|------------------|
| | | Permit: | Program: | |
| Metals: | | | | |
| Influent: | <u>4/yr</u> | <u>4/yr</u> | <u>Not reqd.</u> | <u>Table III</u> |
| Effluent: | <u>4/yr</u> | <u>4/yr</u> | <u>Not reqd.</u> | <u>Table III</u> |
| Sludge: | <u>4/yr</u> | <u>4/yr</u> | <u>Not reqd.</u> | <u>Table III</u> |
| Organics: | | | | |
| Influent: | <u>1/yr</u> | <u>1/yr</u> | <u>Not reqd.</u> | <u>Table II</u> |
| Effluent: | <u>1/yr</u> | <u>1/yr</u> | <u>Not reqd.</u> | <u>Table II</u> |
| Sludge: | <u>1/yr</u> | <u>1/yr</u> | <u>Not reqd.</u> | <u>Table II</u> |

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? **None** If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? _____

Yes,

2. How many IU permits (or other control documents) have been issued? 28

3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**

Yes

4. Does the control document contain the following items?

An expiration date: Yes

Discharge limitations: Yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: Yes

IU reporting requirements: Yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes

Type of sample: Yes

Monitoring frequency: Yes

Bypass prohibition: Yes

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

Penalty Provisions: Yes

Slug load notification: Yes

Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

| | Current frequency: | Program Requirement: |
|-----------------|--------------------|----------------------|
| Sampling: | | |
| categorical IUs | <u>12/yr</u> | <u>1/yr</u> |
| other SIUs | <u>12/yr</u> | <u>1/yr</u> |
| Inspection: | | |
| categorical IUs | <u>1/yr</u> | <u>1/yr</u> |
| other SIUs | <u>1/yr</u> | <u>1/yr</u> |

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes

3. Are inspections announced or unannounced? Unannounced

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: Contract lab

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Good

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).

Yes

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)?

Yes

9. Are sampling and flow monitoring equipment properly maintained?

Yes

10. Is the POTW keeping proper field notes and chain of custody forms?

Yes

11. Is the sampling location representative of the discharge to the collection system?

Yes

12. Are sampling locations identified in POTW records?

Yes

13. Are sampling services available in an emergency?

Yes

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports?

All records and reports are reviewed by John Beard, Ft. Smith Environmental Coordinator.

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?

Yes

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?

Yes

17. What are the POTW's procedures for following up violations?
The City follows their enforcement plan. Response will vary and includes, phone calls, NOV, AO ,show-cause hearings and judicial actions including penalties.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?: Yes

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address: Yes

Other environmental permits held: Yes

Description of operations: Yes

Process flow diagrams: Yes

Flow measurements: Yes

Measurements of regulated pollutants: Yes

Certification of compliance by the IU: Yes

Compliance schedule (if needed): Yes

19. Additional comments on the POTW's inspection and sampling procedures: It appears that the City does an adequate job of monitoring the Pre-treatment Program.

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes

2. How does the POTW respond to the following violations?

Effluent limitations: NOV and show-cause hearing

Late reports: Phone call and NOV

Unpermitted discharges: AO and show-cause hearing

Slug loads or spills: Phone call, NOV, or AO

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes, SW Times on August 31, 2006.

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

| Name: | Type of Violation: | Enforcement Action: | Compliance Deadline: |
|-------------------------|-----------------------|-----------------------|----------------------|
| <u>Quanex</u> | <u>Effluent limit</u> | <u>NOV, penalties</u> | <u>None</u> |
| <u>Southern S&W</u> | <u>Effluent limit</u> | <u>NOV, penalties</u> | <u>expired</u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> | <u> </u> |
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| <u> </u> | <u> </u> | <u> </u> | <u> </u> |

5. Comments on the POTW's enforcement procedures:
The City follows their approved enforcement plan and it appears adequate.
-
-
-
-

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? Yes
-
2. Are staffing levels adequate? Environmental Manager feels increased staff is needed for an Oil and Grease program.
3. Are the responsible officials familiar with the approved program? Yes
-

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: None
-
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? N/A
-
3. Does the POTW have copies of permits for IUs in other cities? N/A
-
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? N/A
-
5. Comments on multijurisdictional issues: N/A
-
-

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: McCourt Manufacturing

POTW Name: City of Ft. Smith, P Street POTW-AR0033278

Industry Contacts: Charles McCourt

Date and Time of Visit: 11-15-06 / 1430-1500

Description of Manufacturing Process:
Assembly of furniture parts. Process at the facility involving
powder painting requires them to have a permit with the City.
At present time, there is no permit.

Sources of Process Wastewater:
Rinse tanks and parts washer.

Categorical Industry? N/A

Basis for Limits: N/A

Point of Application: N/A

Description of Pretreatment Equipment and Procedures:
NA-The facility currently does not have a permit with the City.

Spill Prevention and Solvent Management Procedures:
NA- The facility currently does not have a permit with the City.

Sampling Location and Equipment:
NA-The facility currently does not have a permit with the City.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

| | | CODE |
|---|------------------------------------|------|
| INSPECTOR'S NAME: | <u>Jeff Tyler & David Long</u> | |
| NAME OF FACILITY: | <u>City of Fort Smith</u> | |
| PERMIT NUMBER USED TO TRACK PROGRAM: | <u>AR0021750</u> | NPID |
| DATE OF PCI: | <u>11-15-06</u> | DTIA |

PPETS WENDB DATA ELEMENTS

| | | |
|--|-----------|------|
| NUMBER OF SIGNIFICANT IUS (SIUS): | <u>21</u> | SIUS |
| NUMBER OF CATEGORICAL IUS: | <u>10</u> | CIUS |
| SIUS NOT SAMPLED OR INSPECTED BY POTW: | <u>0</u> | NOIN |
| SIUS WITHOUT CONTROL MECHANISM: | <u>0</u> | NOCM |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING: | <u>2</u> | PSNC |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS: | <u>0</u> | MSNC |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW: | <u>0</u> | SNIN |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

| | | | | | |
|---|-----------------------------------|-----------------------------------|-----------------------------------|-------------------------|----------------------------|
| Transaction Code | NPDES | yr/mo/day | Inspec. Type | Inspector | Fac Type |
| 1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="1"/> <input type="text" value="7"/> <input type="text" value="5"/> <input type="text" value="0"/> 11 12 <input type="text" value="0"/> <input type="text" value="6"/> <input type="text" value="1"/> <input type="text" value="1"/> <input type="text" value="1"/> <input type="text" value="5"/> 17 18 <input type="text" value="P"/> 19 <input type="text" value="T"/> 20 <input type="text" value="1"/> | | | | | |
| Remarks | | | | | |
| <input type="text" value="A"/> <input type="text" value="F"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="6"/> <input type="text" value="6"/> <input type="text" value="-"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="2"/> <input type="text" value="6"/> | | | | | |
| Inspection Work Days | Facility Evaluation Rating | BI | QA | Reserved | |
| 67 <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="1"/> 69 | 70 <input type="text" value="N"/> | 71 <input type="text" value="N"/> | 72 <input type="text" value="N"/> | 73 <input type="text"/> | 74 75 <input type="text"/> |

Section B: Facility Data

| | | |
|---|--|------------------------------------|
| Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City Of Fort Smith, Massard POTW 1609 North 9 th Street Barling, AR 72923 | Entry Time /Date 0815 / 11-15-06 | Permit Effective Date 09-01-03 |
| | Exit Time/Date 1700 / 11-15-06 | Permit Expiration Date 08-31-08 |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Randy Easley / Environmental Manager / 479-784-2337 John Beard / Environmental Coordinator / 479-784-2335 | Other Facility Data | |
| Name, Address of Responsible Official/Title/Phone and Fax Number Steve Parke / Utilities Director / 479-784-2231 3900 Kelly Highway Fort Smith, AR 72904 | Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | |

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

| | | | |
|--|--|---|---|
| <input type="text" value="N"/> Permit | <input type="text" value="N"/> Flow Measurement | <input type="text" value="N"/> Operations & Maintenance | <input type="text" value="N"/> Sampling |
| <input type="text" value="N"/> Records/Reports | <input type="text" value="N"/> Self-Monitoring Program | <input type="text" value="N"/> Sludge Handling/Disposal | <input type="text" value="N"/> Pollution Prevention |
| <input type="text" value="N"/> Facility Site Review | <input type="text" value="N"/> Compliance Schedules | <input type="text" value="S"/> Pretreatment | <input type="text" value="N"/> Multimedia |
| <input type="text" value="N"/> Effluent/Receiving Waters | <input type="text" value="N"/> Laboratory | <input type="text" value="N"/> Storm Water | <input type="text" value="N"/> Other: Effluent Limits |

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

The Pre-Treatment program was rated as satisfactory. The following recommendations are made:

1. More follow-up inspections are needed in regard to the Industrial User surveys. During our inspection, we visited McCourt Manufacturing in Fort Smith. It was determined that this facility should be permitted with the City due to processes at the plant. The City received an IU survey form from the facility in January of 2003, but did not conduct any follow-up inspections of the facility.
2. When reviewing monthly reports from the Industrial Users, the City should require more documentation to confirm that the facility is meeting the conditions of their permit.
3. In order to initiate an oil and grease program and have more support with the data entry, the Environmental Manager feels as if an increase with staffing levels is warranted.

| | | |
|---|--|------------------|
| Name(s) and Signature(s) of Inspector(s) Jeff Tyler & David Long, Region 6 EPA | Agency/Office/Telephone/Fax ADEQ / Fort Smith / 479-452-4822 Ext. 11 / 479-452-4827 | Date 12-28-06 |
| | | |
| Signature of Reviewer | Agency/Office/Phone and Fax Numbers | Date |

ADEQ

A R K A N S A S
Department of Environmental Quality

February 9, 2007

Steve Parke, Director of Utilities
City of Fort Smith
3900 Kelly Hwy.
Fort Smith, AR 72904

Re: AFIN: No. 66-00226 NPDES Permit No. AR0021750

Dear Mr. Parke:

On November 15, 2006, David Long, Environmental Scientist with Region 6 EPA, and I performed a routine pretreatment permit compliance inspection of your facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder. This inspection revealed that the City of Fort Smith is in compliance with terms of the permit. After conducting the assessment, the following recommendations were made:

1. In regard to Industrial Surveys, more follow-up inspections should be conducted by your staff. During the course of our inspection, we reviewed an industrial user survey dated January 30, 2003, from McCourt Manufacturing in Fort Smith. The survey reflected that powder painting was being performed at the plant, so we decided to inspect the facility. After the assessment, it was determined that processes at the plant require this facility to have a permit with the City, which they currently do not have.
2. When reviewing Discharge Monitoring Reports from the industries, it appears that the City should require more documentation such as chains of custody, and bench sheets to insure that the facilities are meeting conditions of their permit.
3. In regard to adequate staffing levels, the Environmental Manager stated that the City needed more manpower in order to initiate an oil and grease program and also needed more support in the area of data entry.

If you have any questions concerning this inspection, please contact me at 479-452-4822 ext. 11.

Sincerely,



Jeff Tyler
District Field Inspector
Water Division

cc: NPDES Enforcement Branch

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: McCourt Manufacturing

Industry Contacts: Mr. Charles McCourt

Type of Industry: Metal finishing

Date of Visit: 11-15-06

- 1. Significant industrial user: Yes No Not Determined
- 2. Pretreatment equipment or procedures? Yes No N/A
- 3. Pretreatment equipment maintained and operational? Yes No N/A
- 4. Hazardous waste generated or stored? Yes No N/A
- 5. Proper solid waste disposal? Yes No N/A
- 6. Solvent management/TTO control? Yes No N/A
- 7. Suitable sampling location? Yes No N/A
- 8. Appropriate self-monitoring procedures / equipment? Yes No N/A
- 9. Adequate spill prevention? Yes No N/A
- 10. Industry familiar with limits and requirements? Yes No N/A

Additional Comments: The facility does not have a permit with the City of Fort Smith.

Visit Conducted By: Jeff Tyler & David Long Date: 11-15-06

