

ADEQ

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

June 9, 2008

Steve Parke, Utilities Director
City of Fort Smith
3900 Kelley Highway
Fort Smith, AR 72904

Re: AFIN: No. 66-00226 NPDES Permit No. AR0021750 & AR0033278

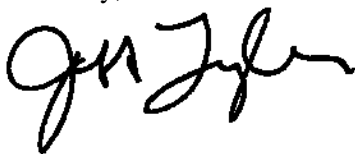
Dear Mr. Parke:

On May 15th, 2008, 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 appears to be in compliance with terms of the permit. While conducting the assessment, the following items were noted:

1. According to facility records Copper Fab's industrial user permit expired on March 18, 2007. The city terminated the permit on July 30, 2007. Although records indicate that the facility maintained a zero discharge that timeframe, they were in operation with an expired IU permit. Also in regard to Copper Fab, the facility was not listed as a terminated permit in the September 28, 2007 annual report which was submitted to our Department. This report covered August 1, 2006-July 31, 2007. Please provide this updated information to our Pre-treatment program staff in North Little Rock.
2. During the course of the inspection, it was noted that the Environmental Manager feels that additional support is needed in the Pre-treatment program in order to initiate an Oil & Grease program and provide data entry support.

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

Sincerely,



Jeff Tyler
District 4 Field Inspector
ADEQ-Water Division

cc: Water Division Enforcement Branch
Water Division Permit Branch



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	N	2	5	3	A	R	0	0	2	1	7	5	0	11	12	0	8	0	5	1	5	17	18	P	19	S	20	1
Remarks																												
A F I N 6 6 - 0 0 2 2 6																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved												
67	0	0	1	69	70	N	71	N	72	N	73		74	75														80

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 0900/ May 15, 2008	Permit Effective Date September 1, 2003
	Exit Time/Date 1600 / May 15, 2008	Permit Expiration Date August 31, 2008
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Randy Easley / Environmental Manager / 479-784-2337		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 type="checkbox"/> No <input checked="" type="checkbox"/>

Section C: Areas Evaluated During Inspection

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

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	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 items were noted:

- Copper Fab's industrial permit expired on March 18, 2007, and the City terminated the permit on July 30, 2007. During that interim time frame, Copper Fab operated under an expired permit. The facility did maintain a zero discharge during that period. The termination of Copper Fab's permit was not submitted in the September 28, 2007, annual report which covered August 1, 2006-July 31, 2007.
- During the course of the inspection, it was noted that the Environmental Manager feels additional support is needed for the pre-treatment program in order to initiate an O & G program and provide data entry support.

Name(s) and Signature(s) of Inspector(s) Jeff Tyler	Agency/Office/Telephone/Fax ADEQ/ Ft.Smith /479-452-4822 Ext. 11 / 479-452-4827	Date June 6, 2008
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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: PCI/ 11/15/06 / Audit / 9/21-24/04

Date of Last Annual Report: September 28, 2007

Name of Inspector: Jeff Tyler

Date PCI Performed: May 15, 2008

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

Name and Title of Other Participants: N/A

Number of IUs Visited: 2

Name(s) of IUs Visited: Qual-Serv Corp. and Sparks Regional

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. Flanders Industries and Copper Fab

2. Has ADEQ or EPA been notified of these changes? No/C-F
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) 20
6. Number of Categorical Industrial Users: 8
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
Hickory Springs	Metal finishing	phosphating
Trane	Metal finishing	phosphating
Fort Smith Plating	Electroplating	Zn & nickel plating
Exide Technologies	Battery mfg.	Re:City fact sheet
Southern Steel & Wire	Metal finishing	phosphating
Quanex Corp.	Iron & steel mfg.	Casting, hot forming
Rheem Mfg.	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? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?

None

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? 30

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.

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? EM feels more staff is needed
in order to support data entry and initiate O&G 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: Qual-Serv

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

Industry Contacts: Mike Cash

Date and Time of Visit: May 15, 2008 / 1415-1500

Description of Manufacturing Process: Manufacture food service equipment, furniture and fixtures for retail food services.

Sources of Process Wastewater: Phoshphate cleaner and metal parts washer

Categorical Industry? Yes, Metal finishing-40 CFR 33

Basis for Limits: Metal finishing categorical PSNS standards

Point of Application: End of application

Description of Pretreatment Equipment and Procedures:
Sequence of tanks which consist of washing-rinsing and pH Adjustment if needed.

Spill Prevention and Solvent Management Procedures:
Hazardous Waste Contingency Plan on file with the City. Limited chemicals are stored in outside building with no floor drains.

Sampling Location and Equipment: Final discharge sump located within the facility.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Sparks Regional Medical Center

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

Industry Contacts: Lu Livingston

Date and Time of Visit: May 15, 2008 / 1520-1600

Description of Manufacturing Process: Various medical procedures generating over 20,000 gallons of waste water per day.

Sources of Process Wastewater: various hospital wastes

Categorical Industry? No

Basis for Limits: Technically based local limits

Point of Application: Discharge pipe

Description of Pretreatment Equipment and Procedures: None

Spill Prevention and Solvent Management Procedures: Facility has developed a spill prevention plan and submitted to the City.

Sampling Location and Equipment: Manhole located on the north side of the building.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Jeff Tyler</u>	
NAME OF FACILITY:	<u>City of Fort Smith</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021750</u>	NPID
DATE OF PCI:	<u>May 15, 2008</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>20</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>8</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>1</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