

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: March 13, 2008

Date of Last PCI/Audit: PCI/ 12/22/09 / Audit / 10/20-23/08

Date of Last Annual Report: October 28, 2010

Name of Inspector: Jeff Tyler

Date PCI Performed: December 2, 2010

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

Name and Title of Other Participants: _____
Jay Lor / Environmental Coordinator / 479-784-2335

Number of IUs Visited: 2

Name(s) of IUs Visited: Hickory Springs and Ft. Smith Plating

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. Deleted-Gerber Products

2. Has ADEQ or EPA been notified of these changes? Yes

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 conducts inspections.
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) 18

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
Gerdau McSteel	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? 27

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 Brad Stewart, City of Fort 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
includes, phone calls, NOV, AO ,show-cause hearings judicial
actions including penalties and termination of service.

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 October 27, 2010.

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>Hiland Dairy</u>	<u>Effluent limit</u>	<u>NOV</u>	<u>12-31-2011</u>
<u>Gerdau</u>	<u>Effluent limit</u>	<u>AO</u>	<u>Pending AO</u>
<u>Southern S & W</u>	<u>Effluent limit</u>	<u>AO</u>	<u>Pending AO</u>
<u>Twin Rivers</u>	<u>Effluent limit</u>	<u>NOV,AO</u>	<u>N/A</u>
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5. Comments on the POTW's enforcement procedures:
The City follows their approved enforcement plan and it
appears adequate.
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F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? Yes
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2. Are staffing levels adequate? EM feels more staff is needed
in order to enhance Pre-Treatment program
3. Are the responsible officials familiar with the approved program? Yes
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G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: City of Arkoma
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2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? Yes-control document
3. Does the POTW have copies of permits for IUs in other cities? N/A
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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
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PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Hickory Springs Manufacturing

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

Industry Contacts: Erin Billings-Environmental Manager

Date and Time of Visit: 12-02-10 / 1445-1555

Description of Manufacturing Process:
Metal stamping and assembling of furniture parts. Cold rolled
steel, punched and pressed. Wire manipulated and shaped into
fabric. Components are dip painted or powder coated.

Sources of Process Wastewater:
Rinse tanks and parts washer. There is also a minor volume
produced in the foam plant, this water is eliminated in an
evaporator within the building.

Categorical Industry? Yes, metal finishing

Basis for Limits: Metal finishing Categorical PSES standards
40 CFR 433

Point of Application: End of treatment process

Description of Pretreatment Equipment and Procedures:
Permittee utilizes chemical precipitation, filtration, pH
adjustments, flocculent, and a filter press prior to discharge.

Spill Prevention and Solvent Management Procedures:
Permittee has a SPCC plan which has been submitted to the
control authority.

Sampling Location and Equipment:
The final effluent discharge channel which is located in the
Pre-treatment area of the facility.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Ft. Smith Plating

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

Industry Contacts: Bobby Dolan, Jr.

Date and Time of Visit: 12-02-10 / 1325-1430

Description of Manufacturing Process: Permittee receives parts from customers. Then the facility strips, buffs, and cleans the parts prior to electroplating.

Sources of Process Wastewater: Rinse tanks, parts drag out, parts cleaning, nickel solution tank, and zinc solution tank

Categorical Industry? Yes, electroplating

Basis for Limits: 40 CFR 413 and POTW technically based local limits.

Point of Application: End of treatment process

Description of Pretreatment Equipment and Procedures: Permittee utilizes chemical precipitation, filtration, pH neutralization and screening prior to discharge.

Spill Prevention and Solvent Management Procedures: Permittee has developed a SPCC and submitted it to the control authority.

Sampling Location and Equipment: Manhole on premises prior to connection with the sanitary sewer.

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>December 2, 2010</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>18</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>4</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