

May 3, 2019

Carl Geffken, City Administrator City of Fort Smith PO Box 1908 Fort Smith, AR 7902

RE: Fort Smith - Massard POTW Inspection (Sebastian Co) AFIN: 66-01652 NPDES Permit No.: AR0021750 ARR000449

Dear Mr. Geffken:

On March 19, 2019, I performed a Compliance Evaluation Inspection and an Industrial Stormwater Inspection of the above-referenced 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. A copy of each of the inspection reports is enclosed for your records.

No violations were noted at the time of the inspections. Please refer to each of the attached inspection reports for any comments.

If I can be of any assistance, please contact me at <u>dannielle.gray@adeq.state.ar.us</u> or (479) 968-7339 extension 11.

Sincerely,

Dannielle Gray District 4 Field Inspector Office of Water Quality

CC: Steve Parks, <u>sparke@FortSmithAR.gov</u> David Shelly, Chief Operator, <u>dshelly@fsark.com</u> Lance McAvoy, <u>Imcavoy@fortsmithar.gov</u>

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

		WATER DIVISION INSPECTION REPORT							
			IN: 66-01652 PI	ERMIT #: AR0021	RMIT #: AR0021750			DATE: 3/19/2019	
A	R K A N S A S	COUNTY: 66 Sebas		stian PDS #:			: 107671 MEDIA:		
Department of Environmental Quality			GPS LAT: 35.340459 LONG: -94.305533 LOCATION: Entrance						
NAME	FACILITY INFORMAT	ION					INFORI	MATION	
	rt Smith - Massard POTW			FACILITY TYPE:INSPECTOR ID#:1 - Municipal71330 S - State					
1609 North 9 th St				FACILITY EVALUATION RATING: INSPECTION TYPE: 4 - Satisfactory Compliance Evaluation					
	rling			(-)	TRY TIME: 9:45		TIME:	PERMIT EFFECTIVE DATE: 2/1/2015	
	RESPONSIBLE OFFIC	CIAL	-	0,10,2010				PERMIT EXPIRATION DATE:	
Ca	rl Geffken / City Administrator				01141			1/31/2020	
COMP	y of Fort Smith			FAYETTEVILLE					
	ng address: Box 1908			FAYETTEVILLE				NS: N	
	STATE, ZIP:			NAME/TITLE/PHONE/FAX/EMAI	L/ETC.:				
-	rt Smith AR 7902			David Shelly/Ch dshelly@fsark.c		perato	or/479-4	52-2735/	
	-494-3908 /			usheliy@isark.c	Join				
EMAIL	avoy@fortsmithar.gov								
	NTACTED DURING INSPECTION:	No							
	(0.0		AREA EVA		·	n			
S	PERMIT	S	FLOW MEASUF	<u>sfactory, N=Not Applicable/</u> REMENT	S		RMWA	TER	
S	RECORDS/REPORTS	S	LABORATORY		S			ITE REVIEW	
S	OPERATION & MAINTENANCE	S		CEIVING WATER	S			ITORING PROGRAM	
S **	SAMPLING	S	SLUDGE HAND	LING/DISPOSAL	**	PRE	TREAT	MENT	
	OTHER:		SUMMARY C						
No	violations were noted during ins	pect							
			GENERAL (COMMENTS					
l in	spected this facility with Mr. Dav	id S			ion co	nsiste	ed of a	facility assessment,	
a re	ecords audit, and a No-Exposure	Cer	tification verifica	tion.					
_		-							
	cility assessment yielded nothing	l ot c	concern. The fac	cility was clean, v	well-o	perate	ed, and	functioning	
ορι	imally at the time of inspection.								
Re	cords audit revealed that the faci	litv r	maintains compl	ete and easily ac	cessi	ble re	cords i	n accordance with	
	mit conditions. An Excel spreads								
	iew of FCB calculations, it was n								
	For example, in April 2018, the l								
	ility's spreadsheet relayed this in e, this rounding down of results								
	ed as a violation. However, the p								
	mulas and amend as necessary t							-	
	λ	brl							
INS	SPECTOR'S SIGNATURE:	al A	Dannielle G	ray				DATE: 3/25/2019	
	U.		MSC.	_					
<u>cı</u> ı		m		Korri MaCaha				DATE 5/2/2010	
30	PERVISOR'S SIGNATURE:			Kerri McCabe				DATE: 5/2/2019	

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ONE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🖾na 🗇ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	Øs 🗆m 🗇u 🖾na 🗇ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆m 🗇u 🖾na 🗇ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🗆na 🗇ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🗇ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <u>Recently installed 3 sets of switch gear backup panels.</u>	Øs 🗆m 🗇u 🖾na 🗇ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: SCADA	Øs 🗆m 🗇u 🖾na 🗇ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆m 🗇u 🖾na 🗇ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	Øs 🗆m 🗇u 🖾na 🗇ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🗇ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

SECTION D: SAMPLING			
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS			
DETAILS:			
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:			
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:			
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:			
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:			
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:			
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	Øy 🛛 n 🗆 na 🗆 ne		
a. SAMPLES REFRIGERATED DURING COMPOSITING:			
b. PROPER PRESERVATION TECHNIQUES USED:			
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:			
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:			
SECTION E: FLOW MEASUREMENT			
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE		
DETAILS:			
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: Yes TYPE OF DEVICE: 24" Parshal			
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	Øy 🛛 n 🗆 na 🗆 ne		
 SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>Siemens Sitra</u> <u>lut440 flowmeter</u> 			
4. CALIBRATION FREQUENCY ADEQUATE:	Øy 🛛 n 🖓 na 🖓 ne		
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:			
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:			
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:			
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:			
9. HEAD MEASURED AT PROPER LOCATION:			
SECTION F: LABORATORY			
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	⊠S ⊡M ⊡U ⊡NA ⊡NE		
DETAILS:			
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :			
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:			
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:			
4. QUALITY CONTROL PROCEDURES ADEQUATE:			
5. DUPLICATE SAMPLES ARE ANALYZED <a>>10% OF THE TIME:			
6. SPIKED SAMPLES ARE ANALYZED <u>></u> 10% OF THE TIME:			
7. COMMERCIAL LABORATORY USED:			
a. LAB NAME: City of Fort Smith certified lab			
b. LAB ADDRESS: 3900 Kelley Highway, Fort Smith, AR 72904			
c. PARAMETERS PERFORMED: BOD, CBOD, TSS, NH3-N, FCB, Total Recoverable Cyanide, TP, and NO3+NO2-N; flow, pH, DC) all analyzed onsite.		
8. BIOMONITORING PROCEDURES ADEQUATE: Bio monitoring reduction approved June 2017.			
a. PROPER ORGANISMS USED:			
b. PROPER DILUTION SERIES FOLLOWED:			
c. PROPER TEST METHODS AND DURATION:			
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	DY DN ØNA DNE		

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS												
BASED ON	ASED ON VISUAL OBSERVATIONS ONLY ZISCHART DI LA											
DETAILS:	ETAILS: Post Parshall flume at effluent box											
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	DS COLOR OTHER						
001	None	None	None	None	None	clear						
		•		•		·						
SECTION H	: SLUDGE DIS	POSAL										
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS												
DETAILS:	Thicken, belt p	ress, and landfi	<u>II.</u>									
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m						
2. SLUDGE R	ECORDS MAINTAINE	D AS REQUIRED BY 40) CFR 503:			⊠s ⊡m						
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIEI	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):							
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES									
SAMPLE R	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊠NA ⊡NE					
DETAILS:												
1. SAMPLES	OBTAINED THIS INSP	ECTION:				ΠY	⊡n Øna ⊡ne					
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:								
3. SAMPLES	PRESERVED:					ΠY	□n Øna □ne					
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:				ΠY	□n Øna □ne					
5. SAMPLE O	BTAINED FROM FACII	LITY'S SAMPLING DE	/ICE:			ΠY	□n Øna □ne					
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			ΠY	□n Øna □ne					
7. SAMPLE SI	PLIT WITH PERMITTE	E:				ΠY	□n Øna □ne					
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					□n Øna □ne					
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY	□n Øna □ne					
		ER POLLUTION										
				QUIREMENTS			U DNA DNE					
		-Exposure certi	fication under p	permit ARR0004	49; no exposure	status verified	during					
inspection.			DATE									
		HARGES AND SURFA	JE WATERS.									
	N PREVENTION TEAM											
			:									
		AND PAST SPILLS AND										
		ARGES ARE AUTHOR										
	RUCTURAL BMPS:	200										
	DN-STRUCTURAL BMP											
	PERLY OPERATED A						ON ONA ONE					
II. INSPECTIC	ONS CONDUCTED AS					ЦĬ						

FLOW CALCULATION SHEET

Date: 3/1	9/2019	Time: 100)5						
			4 051		1				
Head in Inc	hes:	Feet:	1.85'						
Type & Siz	of Primary Flo	W Maasurar		avica	· 24" Pa	reha	all Flume with staff gag		
					. 27 10	1 3110	an i funic with stan gay		
Name & Mo	odel of Seconda	ary Flow Mea	surem	ent D	evice:	Sie	mens Sitrans lut440		
						flov	wmeter		
Date of last	t Calibration of S	Secondary F	low De	vice:	N/E				
Recorded F	Flow at Date & T	Time Listed	hove:	13	59 MG)	(Equility Flow Motor)		
			10010.	10.		,	(Facility Flow Meter)		
Calculated	Flow at Date &	Time Listed	Above	: 1	3.42 MG	D			
(Flow is calcula	ted using flow charts i	n: <u>ISCO Open C</u>	hannel Fl	ow Mea	asurement	Handb	book-5 th Edition)		
	Described \/el		lotod	Valu					
% Error =	Recorded Value - Calculated Value Calculated Value				X 1	00			
	Ca	iculated val	ue						
	13.59	-	13.42	2		~ ~			
% Error =		13.42		Z 10		00			
		-							
% Error =	0.17	— X 100							
70 EII0I =	13.42	X 100							
0/ 5	0.0400070	V 400							
% Error =	0.0126676	X 100							
% Error =	1.266766	%							
70 200		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,							
Comments: Flowmeter is measuring within deviation allowance.									

DMR Calculation Check

Reporting Period:	From	2018 Year	04 Month	01 Day	_ To _	2018 Year	04 Month	<u>30</u> Day	
Parameter Checked:		FCB	-						
		Loading Mass Mo. Avg Ibs/day					ntration nthly		
	Mo.				Mo. Avg. – col/100ml			vg. – 0ml	
Reported Value:		N/A			10			11	
Calculated Value:	N/A			<mark>11</mark>			<mark>12</mark>		
Permit Value: N/A			200 400)			

If calculated value does not equal reported value, explain:

The facility conducts its calculations using an Excel spreadsheet with formulas built in. This spreadsheet is rounding results down. However, the above numbers reflect standard rounding rules.

Monthly Average = 10.5 (rounded up to 11) 7-Day Average = 11.57 (rounded up to 12)

DMR Calculation Check

Reporting Period:	From	2017 Year	06 Month	01 Day	_ To _	2017 Year	06 Month	<u>30</u> Day		
Parameter Checked:		NH3-N	-							
		Loading Mass			Concentration Monthly					
	Mo.	Mo. Avg Ibs/day		Mo. Avg mg/l			7-day Avg mg/l			
Reported Value:		234.7		3.1			3.5			
Calculated Value:	Value: 235			3.1			3.5			
Permit Value:		417			5		7.5			

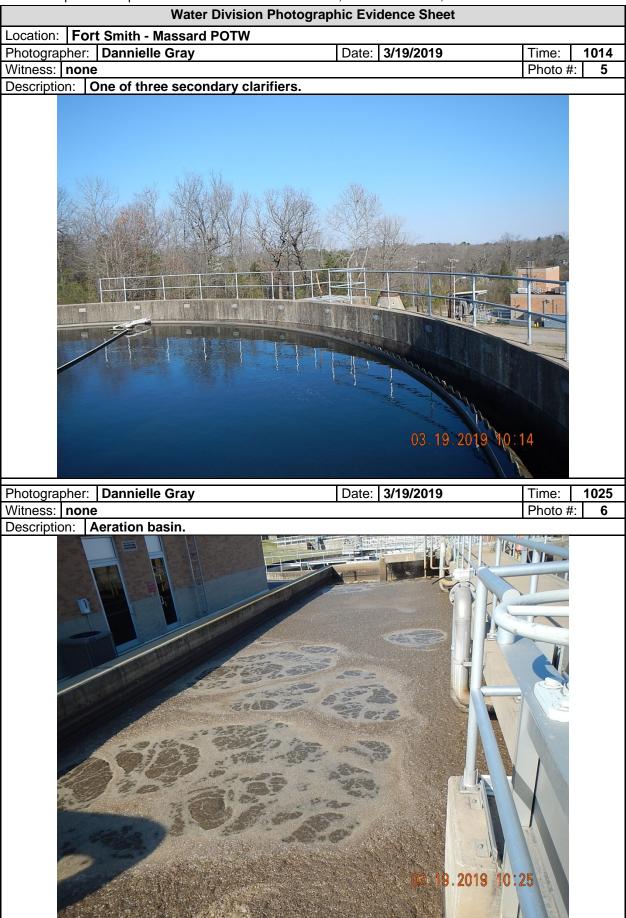
If calculated value does not equal reported value, explain:

Rounding differences



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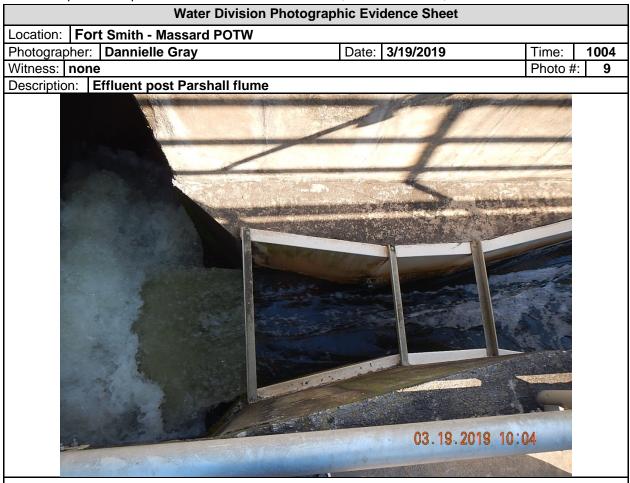




Figure 1. Google Earth image (not dated) showing facility overview and major treatment components.