



# ARKANSAS

## ENERGY & ENVIRONMENT

October 20, 2021

Mr. Carl Geffken, City Administrator  
City of Fort Smith  
P.O. Box 1908  
Fort Smith, AR 72902

RE: City of Fort Smith Inspection  
AFIN: 66-01652 Permit No.: AR0021750

Dear Mr. Geffken:


On September 1 and 2, 2021, I performed a Pretreatment Compliance 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 the inspection report is enclosed for your records.

No violations were noted at the time of the inspection. Please refer to the Summary of Findings and General Comments sections of the report for any comments and details. If I can be of any assistance please contact me at [Bolenbaugh@adeq.state.ar.us](mailto:Bolenbaugh@adeq.state.ar.us) or 501-682-0659.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason R. Bolenbaugh'.

Jason Bolenbaugh  
Compliance Branch Manager, Office of Water Quality  
5301 Northshore Drive, North Little Rock, AR, 72118

 <b>ENVIRONMENTAL QUALITY</b>	<b>OFFICE OF WATER QUALITY</b>		
	<b>INSPECTION REPORT</b>		
	AFIN: <b>66-01652</b>	PERMIT #: <b>AR0021750</b>	DATE: <b>9/1/2021</b>
	COUNTY: <b>66 Sebastian</b>	PDS #: <b>117867</b>	MEDIA: <b>WN</b>
GPS LAT:	LONG:	LOCATION: <b>*****</b>	
<b>FACILITY INFORMATION</b>		<b>INSPECTION INFORMATION</b>	
NAME: <b>City of Fort Smith</b> LOCATION:  CITY: <b>Fort Smith</b>		FACILITY TYPE: <b>1 - Municipal</b>	
		INSPECTOR ID#: <b>83321 S - State</b>	
		FACILITY EVALUATION RATING: <b>***</b>	
		INSPECTION TYPE: <b>Pretreatment Compliance</b>	
		DATE(S): <b>9/1/2021</b>	ENTRY TIME: <b>09:00</b>
		EXIT TIME: <b>12:00</b>	PERMIT EFFECTIVE DATE: <b>3/1/2021</b>
		DATE(S): <b>9/2/2021</b>	ENTRY TIME: <b>09:00</b>
		EXIT TIME: <b>11:15</b>	PERMIT EXPIRATION DATE: <b>2/28/2026</b>
<b>RESPONSIBLE OFFICIAL</b>			
NAME: / TITLE <b>Mr. Carl Geffken / City Administrator</b> COMPANY: <b>City of Fort Smith</b> MAILING ADDRESS: <b>P.O. Box 1908</b> CITY, STATE, ZIP: <b>Fort Smith AR 72902</b> PHONE & EXT: / FAX: <b>479-784-2201 /</b> EMAIL: <b>CGeffken@FortSmithAR.gov</b>		FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>	
CONTACTED DURING INSPECTION: <b>No</b>		<b>INSPECTION PARTICIPANTS</b>	
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>From the City of Fort Smith</b> <b>Mr. Rahul Thukral, Deputy Director of Operations</b> <b>Mr. Don Clover, Env. Quality Program Manager</b> <b>Mr. John Hancock, Env. Monitoring Supervisor</b> <b>Ms. Lindsey Rice, Pretreatment Coordinator</b>	
<b>AREA EVALUATIONS</b>			
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)			
**	PERMIT	**	FLOW MEASUREMENT
**	RECORDS/REPORTS	**	LABORATORY
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL
**	OTHER:	<b>S</b>	PRETREATMENT
<b>SUMMARY OF FINDINGS</b>			
<b>Non-Action Items</b>			
<ul style="list-style-type: none"> <li>• On June 21, 2021, the Division of Environmental Quality, Office of Land Resources (OLR) received a complaint that alleged a machine used to clean brass parts leaked at FedArm, and the facility maintenance personnel vacuumed the sludge and other materials and dumped it into a drain outside. Although no evidence of improper disposal of hazardous waste was observed, the OLR determined the facility was operating as a Large Quantity Generator of hazardous waste. Please monitor this site to ensure proper disposal of all wastes. A copy of the report is included for the pretreatment staff's review.</li> <li>• From August 1, 2018 to July 31, 2019, Baptist Health Fort Smith and Solder Plating LLC were added to the pretreatment program and Sparks Regional Medical Center and Trane were subtracted from the program. From August 1, 2019 to July 31, 2020, ABB Die Casting, Fedarm, and Silgan Plastics were added to the program and Twin Rivers Foods was removed. From August 1, 2020 to July 21, 2021, Hytrol Manufacturing was added to the program. Hytrol Manufacturing was included in the most recent annual report submitted to the DEQ on September 30, 2021. Currently there are 21 Significant Industrial Users (SIU) of which 10 are Categorical SIUs. Of those 10, four do not discharge pretreated process wastewater to the City of Fort Smith POTWs.</li> <li>• From August 1, 2018 to July 31, 2020, no SIU was in Significant Non-Compliance (SNC) status. Highland Dairy was the last SIU to be in SNC status due to continued permit limitation violations. Administrative Order (AO) 16-002 was finalized by the City of Fort Smith which required corrective actions to achieve compliance with the permit and to pay penalties. The last annual report submitted by the City of Fort Smith revealed Highland Dairy was issued one Notice of Violation for a permit limitation violation.</li> <li>• The inspection reports provided for Solder Plating, LLC. and Baptist Health – Ft. Smith were very informative. Each report provided the necessary background information such as the facility's</li> </ul>			


manufacturing process, produced waste streams, treatment mechanisms, bypasses and upsets, sampling and analysis review, hazardous waste storage and disposal, and more.

- The Enforcement Response Plan developed by pretreatment personnel is very well written and provides an excellent guide for SIUs to understand how the pretreatment program administers their enforcement responsibilities for each type of violation. Pretreatment staff continues to monitor each SIU and issue the necessary Notice of Violations for permit effluent limitation violations and/or reporting deadline infractions. Each annual report clearly defines which facility had a violation and what types of actions were taken by the pretreatment program staff.

**GENERAL COMMENTS**

- The City of Fort Smith has two POTWs, P Street (AR0033278) and Massard (AR0021750) that accept pretreated process wastewater from SIUs.
- During the 2016 and 2017 calendar years the pretreatment program was significantly updated by current pretreatment personnel. This included conducting a massive survey of commercial/industrial customers to determine which facilities required permitting. The survey didn't yield any additional permitted facilities. However, the IU survey was updated to its current form; the Enforcement Response Plan (ERP) and Enforcement Response Plan Guide (ERPG) were developed; and, appropriate enforcement actions were taken for applicable facilities.
- IU inspections were conducted at Solder Plating, LLC and Baptist Health – Fort Smith. A separate inspection report has been completed for each facility.
- Pretreatment program personnel were very knowledgeable of pretreatment requirements and were very helpful in providing an abundance of requested documentation. Their assistance was greatly appreciated.

The date stamps on the photographs are incorrect. The inspections of the SIUs were conducted on September 2, 2021 and not September 30, 2021. The time stamps are accurate.

INSPECTOR'S SIGNATURE: ←Click text to left to add signature	-Inspector Name	DATE:
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 10/19/2021

**DIVISION OF ENVIRONMENTAL QUALITY  
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT**

Name of Municipality: <b>City of Fort Smith</b>
AFIN Number(s): <b>66-00226 (Massard), 66-01653 (P. Street)</b>
NPDES Permit Number(s): <b>Massard - AR0021750, ARG160017, ARR001116</b> <b>P. Street - AR0033278, AR0033278C, ARR000830</b>
Program Tracked under NPDES Permit Number(s): <b>AR0021750 &amp; AR0033278</b>
Fact Sheet Preparation Date: <b>March 1, 2021</b>
Date of Last PCI/Audit: <b>June 6, 2017 (PCI), September 15, 2015 (Audit)</b>
Date of Last Annual Report: <b>October 1, 2020</b>
Name of Inspector: <b>Jason Bolenbaugh</b>
Date PCI Performed: <b>September 1 &amp; 2, 2021</b>
Name and Title of Facility Representative: <b>Mr. John Hancock, Environmental Monitoring Supervisor</b>
Name and Title of Other Participants: <b>Mr. Rahul Thukral, Deputy Director of Operations</b> <b>Mr. Don Clover, Environmental Quality Program Manager</b> <b>Ms. Lindsey Rice, Pretreatment Coordinator</b>
Number of IUs Visited: <b>2</b>
Name(s) of IUs Visited: <b>Solder Plating, LLC.</b> <b>Baptist Health - Fort Smith</b>
NOTES: AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED. ANY QUESTION PRINTED IN ALL CAPS INDICATES 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.

<b>A. INDUSTRIAL USER SURVEY</b>	
1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. <b>Yes, there have been SIUs added and subtracted from the program. Please see General Comments section of the report.</b>	
2. Has ADEQ or EPA been notified of these changes? <b>Yes, Hytrol Manufacturing has been added as a Categorical SIU and notification was provided on September 30, 2021 when the permittee submitted the annual report to the OWQ Permits Branch.</b>	
3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? <b>Yes. Reviewed Solder Plating LLC IU Survey that was signed on August 12, 2021.</b>	
4. What procedures are being used to update the IU Survey? <b>The survey format was last updated in 2016/2017 when the program conducted a mass survey and it hasn't required additional revisions since.</b>	
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): <b>21</b>	
6. Number of Categorical Industrial Users: <b>10</b>	
7. How does the POTW determine the appropriate categorical standards to apply to an IU? <b>Program staff evaluates the facilities through site visits, IU surveys, and applications and use 40 CFR to help determine permit limits/requirements.</b>	
8. List all of the Categorical IUs discharging under the approved program.	
Name of IU:	Category:
<b>Solder Plating LLC</b>	<b>Metal Finishing</b>
<b>ABB Die Casting</b>	<b>Metal Molding/Casting</b>
<b>GNB Industrial Power</b>	<b>Battery Manufacturing</b>
<b>Fedarm</b>	<b>Metal Finishing</b>
<b>Fort Smith Plating Co.</b>	<b>Electroplating</b>
<b>Gerdau MacSteel</b>	<b>Iron/Steel Manufacturing</b>
<b>Hickory Springs Mfg.</b>	<b>Metal Finishing</b>
<b>QualServ Corp.</b>	<b>Metal Finishing</b>
<b>Silgan Plastics</b>	<b>Plastics Molding/Forming</b>
<b>Hytrol Manufacturing</b>	<b>Metal Finishing</b>

B. LOCAL LIMITS						
1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? <b>Yes, the POTW is applying local limits that have been approved. Pollutants include BOD/COD, TSS, pH, O&amp;G, and Temp.</b>						
2. Describe any apparent problems with the local limits. <b>None</b>						
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:		Sampling Frequency		Permit Requirement		Program Requirement
Metals:						
Influent:		<b>Quarterly</b>		<b>Quarterly</b>		<b>Quarterly</b>
Effluent:		<b>Quarterly</b>		<b>Quarterly</b>		<b>Quarterly</b>
Organics:						
Influent:		<b>Annually</b>		<b>Annually</b>		<b>Annually</b>
Effluent:		<b>Annually</b>		<b>Annually</b>		<b>Annually</b>
Comments:						
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? <b>None</b>						

<b>C. INDUSTRIAL USER CONTROL MECHANISM</b>
1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? <b>Yes, the POTW issues permits to each SIU and they have differing expiration dates.</b>
2. How many IU permits (or other control documents) have been issued? <b>At the time of the inspection all SIUs (20) were issued permits.</b>
3. DO ALL <u>SIGNIFICANT IUS</u> 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. <b>At the time of the inspection all permits were active.</b>
4. Does the control document contain the following items? List the section of the permit each item is listed under. <b>Reviewed Solder Plating LLC.</b>
An expiration date: <b>March 1, 2019 to March 1, 2024</b>
Discharge limitations: <b>Part I, Outfall 001.</b>
<b>Once/Month Composites: BOD<sub>5</sub>, TSS, Cd, Cr, Cu, Pb, Ni, Ag, Zn, and Cyanide (Total); Once/Month Grabs: FOG and pH; Twice/Year Composite: TTO.</b>
If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under.
IU self-monitoring requirements: <b>Part 1</b>
IU reporting requirements: <b>Part 2</b>
5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under.
Sample location: <b>Outfall 001 at final effluent discharge channel</b>
Type of sample: <b>Grabs and Composites</b>
Monitoring frequency: <b>Once/Month except TTO (Twice/Year)</b>
Bypass prohibition: <b>Section B.3</b>
Right of entry: <b>Section C.5</b>
Non-transferability: <b>Section A.8</b>
Revocation clause: <b>Section A.5</b>
Penalty Provisions: <b>Section D.9</b>
Slug load notification: <b>Part 2.D</b>
Notification of process change: <b>Section D.1</b>

D. MONITORING OF IUS BY POTW			
1. Indicate current inspection and sampling frequency and program requirement below.			
		Current frequency:	Program Requirements:
Sampling:			
Categorical IUs		<b>Annually</b>	<b>Annually</b>
Other SIUs		<b>Annually</b>	<b>Annually</b>
Non-SIUs		<b>Bi-monthly</b>	
Inspection:			
Categorical IUs		<b>Annually</b>	<b>Annually</b>
Other SIUs		<b>Annually</b>	<b>Annually</b>
Non-SIUs		<b>Bi-annually</b>	
Comments: <b>Five of the 9 Categorical SIUs at the time were sampled in 2020. Four (4) are No Dischargers. There are 6 non-SIUs.</b>			
2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? <b>Yes</b>			
3. Are inspections announced or unannounced? <b>Most inspections are announced.</b>			
4. Are records kept of each inspection? <b>Yes</b>			
5. Does the inspection report contain an adequate description of the following: <b>Solder Plating inspection</b>			
Date and time of inspection: <b>June 10, 2020</b>			
Officials present: <b>Alyssa Bell, John Hancock, Aaron Toth</b>			
Inspection of chemical storage areas: <b>Yes</b>			
Description of regulated processes, categorical waste streams, and discharge location of these waste streams: <b>Yes</b>			
Inspection of the pretreatment facilities: <b>Yes</b>			
Review of self-monitoring records: <b>Yes</b>			
Observation of IU self-monitoring procedures: <b>Yes</b>			
Verification that approved analytical techniques are used: <b>Yes</b>			
Verification of IU flow measurement (where required): <b>Yes</b>			
6. Please describe the overall adequacy of inspection documentation: <b>The inspection/report of this facility was very informative. When reviewing the report it provided an accurate account of the facility's industrial processes, pretreatment system, chemical availability, waste disposal, self-monitoring procedures, and more.</b>			
7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? <b>Yes, program staff inspected and sampled all SIUs annually.</b>			
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? <b>Yes</b>			



9. Are sampling and flow monitoring equipment properly maintained? <b>Yes. Solder Plating has one outfall and the sample tubing is lowered into the flow stream during collection periods.</b>
10. Is the POTW keeping proper field notes and chain of custody forms? <b>Yes</b>
11. Is the sampling location representative of the discharge to the collection system? <b>Yes</b>
12. Are sampling locations identified in POTW records? <b>Yes</b>
13. Are sampling services available in an emergency? <b>No. All SIUs are required to use 3<sup>rd</sup> party laboratories so they would provide emergency sampling if required.</b>
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? <b>All necessary documents receipts are maintained on a spreadsheet by program staff.</b>
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? <b>Yes</b>
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? <b>Yes</b>
17. What are the POTW's procedures for following up violations? <b>The program staff will contact the facility via phone call, email, and or letter.</b>
<b>18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?</b>
Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR. <b>BMR was not evaluated during this inspection.</b>
Name and address:
Other environmental permits held:
Description of operations:
Process flow diagrams:
Flow measurements:
Measurements of regulated pollutants:
Certification of compliance by the IU:
Compliance schedule (if needed):
19. Additional comments on the POTW's inspection and sampling procedures: <b>None</b>

E. Enforcement
1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? <b>Yes, the POTW has an established Enforcement Response Plan (ERP) and Guideline under Ordinance 27-16 which outlines the duties of each staff member from the Environmental Technician to the Director of Utilities and legal staff.</b>
2. How does the POTW respond to the following violations?
Effluent limitations: <b>Infrequent violations will cause the facility to be in Non-Compliance (NC) status and will receive a Notice of Violation (NOV) from the Environmental Coordinator (EC) or Environmental Monitoring Supervisor (EMS). If violations are frequent or persist then the facility will be in Significant Non-Compliance (SNC), and an Administrative Order (AO) and penalty may be issued by the Deputy Director of Operations (DDO).</b>
Late reports: <b>An isolated incident will be addressed by letter or email by the EC and EMS. Second incident will result in a NOV and potential meeting with the permittee. Continued incidents the facility will be in SNC and an AO and penalty issued by the DDO.</b>
Unpermitted discharges: <b>A one-time incident without damage to the POTW will result in an AO and penalty issued by the DDO. Continued unpermitted discharges and/or damage to the POTW will cause the facility to be in SNC and result in a combination of Show Cause Hearing (SCH), Judicial Action (JA), termination of the permit or service, and civil penalty.</b>
Slug loads or spills: <b>Slug loads that are one-time event and do not disrupt the operations of the POTWs can result in an AO being issued but the facility may only be in a NC status. Slug loads that occur multiple times or are frequent and/or damage the POTW will result in a SCH, JA, and possible termination of the permit and service.</b>
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)? <b>From August 1, 2019 to July 30, 2020, no SIU was in SNC. If a violation requires publishing it is published on the first Sunday of October in the Southwest Times.</b>
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. <b>The last SIU to be in SNC was Hiland Dairy in which an Administrative Order was completed in 2017 for continued effluent violations.</b>
5. Comments on the POTW's enforcement procedures: <b>The enforcement procedures have proven effective and the ERP outlines standard procedures for how staff is to perform enforcement actions.</b>

<b>F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE</b>
1. Is the program structure essentially the same as that presented in the approved pretreatment program? <b>Yes. The structure of the program consists of the following individuals: Lance McAvoy (Program Director), Rahul Thukral (Dep. Director of Operations), Don Clover (Env. Quality Program Manager), John Hancock (Env. Monitoring Supervisor), Lindsey Rice (Pretreatment Coordinator), Lojay Kiatoukaysy (Pretreatment Tech.), and Eric White (Pretreatment Tech.).</b>
2. Are staffing levels adequate? <b>Yes, it does appear staffing levels are adequate.</b>
3. Are the responsible officials familiar with the approved program? <b>Yes. Mr. McAvoy facilitated the inspection by submitting my request but Mr. Thukral and Mr. Clover also attended the inspection.</b>
<b>G. MULTIJURISDICTIONAL ISSUES</b>
1. List any IUs which are located outside of the jurisdictional area of the POTW: <b>The City of Fort Smith does permit the City of Arkoma, Oklahoma to discharge approximately 300,000 to 350,000 gallons per day of domestic wastewater to the P-Street POTW.</b>
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? <b>Yes</b>
3. Does the POTW have copies of permits for IUs in other cities? <b>Yes</b>
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? <b>No. However, the City of Arkoma was issued 7 Notice of Violations from August 1, 2019 to July 31, 2020 due to effluent limitation violations.</b>
5. Comments on multijurisdictional issues: <b>None</b>

**PRETREATMENT COMPLIANCE INSPECTION  
IU SITE VISIT FORM**

Name of Industry: <b>Baptist Health - Fort Smith</b>
POTW Name: <b>P-Street</b>
Industry Contacts: <b>Mr. Karl Potts, Dir. of Engineering &amp; Maintenance</b>
Date and Time of Visit: <b>September 2, 2021 @ 09:15</b>
Description of Manufacturing Process: <b>There isn't a manufacturing process that produces goods. Wastewater is derived from a medical laboratory and small volumes of waste analysis chemicals.</b>
Sources of Process Wastewater: <b>Wastewater derived from the medical laboratory and domestic wastewater.</b>
Categorical Industry? <b>Not a Categorical SIU</b>
Basis for Limits: <b>Local</b>
Point of Application: <b>Wastewater derived from the medical laboratory is sent to an in-ground limestone filtration tank for neutralization prior to being discharged through Outfall 001. Outfall 002 wastewater stream is domestic wastewater only.</b>
Description of Pretreatment Equipment and Procedures: <b>Pretreatment equipment consists of a limestone filtration pit to adjust pH prior to the discharge to Outfall 001. Approximately 82,000 gallons per day is discharged through Outfall 001.</b>
Spill Prevention and Solvent Management Procedures: <b>The facility does maintain a spill prevention plan.</b>
Sampling Location and Equipment: <b>Sampling equipment was not maintained on site as the City requires all SIUs to hire a 3<sup>rd</sup> party laboratory for all compliance sampling. Data Testing does all of the sampling for Baptist Health. Outfall 001 is located inside a manhole pm G-Street South where sampling equipment is able to be stored within the manhole so composite samples may be collected. The flow meter is located at the southwest corner of the building on South 12<sup>th</sup> St. Outfall 002 is located just south of the west main entrance of the hospital on I-Street South and the flow meter is located just south of the east main entrance on I-Street South.</b>

**PRETREATMENT COMPLIANCE INSPECTION  
IU SITE VISIT FORM**

Name of Industry: <b>Solder Plating, LLC.</b>
POTW Name: <b>Massard</b>
Industry Contacts: <b>Mr. Aaron Toth</b>
Date and Time of Visit: <b>September 2 @ 10:30</b>
Description of Manufacturing Process: <b>The facility specializes in providing metal finishing for busbar fabrication produced by SPF America. The facility processes consist of tin, nickel, and tin-lead alloy plating.</b>
Sources of Process Wastewater: <b>The wastewater produced during manufacturing can contain nickel, tin, and lead pollutants. The daily flows are approximately 1,700 gallons per day.</b>
Categorical Industry? <b>Yes, this is a Categorical SIU</b>
Basis for Limits: <b>Local Limits &amp; 40 CFR 433</b>
Point of Application: <b>Wastewater from the production area is sent to the treatment system where wastewater is treated to conform with the terms of the permit and 40 CFR 433. Treated wastewater is discharged to the POTW through Outfall 001 while solids are pressed and hauled away and disposed of properly.</b>
Description of Pretreatment Equipment and Procedures: <b>The treatment system includes three holding tanks for rinse waters, alkaline cleaners, and acids. Effluents flow from holding tanks into treatment tank 1, then treatment tank 2, and then through the clarifier where solids are separated from solution. Treated effluent is discharged to the POTW. Solids are processed in a filter press and disposed of by US Ecology in Tulsa, Oklahoma.</b>
Spill Prevention and Solvent Management Procedures: <b>The facility has developed a spill response plan.</b>
Sampling Location and Equipment: <b>The sampling location is located at the northwest corner of the facility. The sampling location is adequate to obtain the necessary samples.</b>

**PPETS CODE SHEET  
PRETREATMENT COMPLIANCE INSPECTION (PCI)**

	CODE
INSPECTOR'S NAME: <u>Jason Bolenbaugh</u>	
NAME OF FACILITY: <u>City of Fort Smith</u>	
PERMIT NUMBER USED TO TRACK PROGRAM: <u>AR0021750 &amp; AR0033278</u>	NPID
DATE OF PCI: <u>September 1 &amp; 2, 2021</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>0</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