



ARKANSAS

ENERGY & ENVIRONMENT

October 20, 2021

Mr. Monty Ledbetter, Utilities Director
City of Hot Springs POTW
780 Adams Street
Hot Springs, AR 71901

RE: Hot Springs POTW Inspection (Garland Co)
AFIN: 26-00145 NPDES Permit No.: AR0033880

Dear Mr. Ledbetter:

On August 18, 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 inspection report for any comments. If I can be of any assistance please contact me at harmont@adeq.state.ar.us or (501) 837-2070.

Sincerely,

A handwritten signature in cursive script that reads "Travis Harmon".

Travis Harmon
Inspector, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118



**ENVIRONMENTAL
QUALITY**

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: 26-00145	PERMIT #: AR0033880	DATE: 8/18/2021
COUNTY: 26 Garland	PDS #: 117875	MEDIA: WN
GPS LAT: 34.450316 LONG: -93.013033 LOCATION: General Area		

FACILITY INFORMATION

NAME:
Hot Springs POTW
LOCATION:
320 Davidson Drive
CITY:
Hot Springs, AR 71901

RESPONSIBLE OFFICIAL

NAME: / TITLE
Mr. Monty Ledbetter / Utilities Director
COMPANY:
City of Hot Springs POTW
MAILING ADDRESS:
780 Adams Street
CITY, STATE, ZIP:
Hot Springs AR 71901
PHONE & EXT: / FAX:
501-651-7730 /
EMAIL:
mledbetter@cityhs.net
dbrunson@cityhs.net

CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE: 1 - Municipal	INSPECTOR ID#: 34689 S - State		
FACILITY EVALUATION RATING: 3 - Satisfactory	INSPECTION TYPE: Pretreatment Compliance		
DATE(S): 8/18/2021	ENTRY TIME: 09:00	EXIT TIME: 12:00	PERMIT EFFECTIVE DATE: 9/1/2018
			PERMIT EXPIRATION DATE: 8/31/2023

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Mr. Dennis Brunson/ Pretreatment Coord./501-262-1881 ext. 2861

AREA EVALUATIONS

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

S	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER
N	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW
N	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
N	OTHER:				

SUMMARY OF FINDINGS

I found no violations at the time of inspection.

GENERAL COMMENTS

Introduction

I conducted a pretreatment compliance inspection on August 18, 2021. Mr. Dennis Brunson, Pretreatment Coordinator, represented the city during the inspection. The City of Hot Springs operates a municipal collection system with two wastewater treatment plants. The city has implemented a pretreatment program with four significant industrial users; three of which are categorical industrial users. There have been no changes regarding IUs since the previous PCI conducted August 8, 2017.

Pretreatment Inspection

Mr. Brunson provided a fact sheet, permit applications for the four SIUs, and a BMR for Triumph Airborne Structures. I also printed the 2020 year annual report for the PCI. All four SIUs had current permits with the city. For 2020, due to COVID-19, Mr. Brunson has conducted inspections via Zoom or Facetime, and Mr. Bill Garner, City Inspector (not present), collected samples from the IUs. Permit applications contained process descriptions, treatment process components, and slug control plans. The permits contained the proper requirements. All SIUs were inspected and samples per program requirements during 2020. The city has not experienced non-compliance from the SIUs in several years. Mr. Brunson and I also conducted an IU inspection of the pretreatment system at Alliance Rubber Company via Facetime.

INSPECTOR'S SIGNATURE: <i>Travis Harmon</i>	DATE: 8/18/2021
SUPERVISOR'S SIGNATURE: <i>Kerri McCabe</i>	DATE: 10/19/2021

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

Name of Municipality: Hot Springs POTW
AFIN Number: 26-00145
NPDES Permit Number: AR0033880
Program Tracked under NPDES Permit Number: AR0033880
Fact Sheet Preparation Date: July 27, 2017
Date of Last PCI/Audit: March 24-26, 2015
Date of Last Annual Report: January 29, 2021
Name of Inspector: Travis Harmon
Date PCI Performed: August 18, 2021
Name and Title of Facility Representative: Dennis Brunson, Pretreatment Coordinator
Name and Title of Other Participants: N/A
Number of IUs Visited: 1 via Facetime
Name(s) of IUs Visited: Alliance Rubber Company
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED
NOTE: ANY QUESTION PRINTED IN ALL CAPS PRINT 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.

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. No changes since previous PCI conducted 8/18/2017.				
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? Identified by city "Water Start-up Notice" and inspector site visits.				
5. Total number of Significant Industrial Users, according to the definition used by the POTW: 4				
6. Number of Categorical Industrial Users: 3				
7. How does the POTW determine the appropriate categorical standards to apply to an IU? 40 CFR Parts 433.12 & 437.				
8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (i.e. Metal Finishing), and the regulated process (i.e. phosphating, zinc plating, etc.). Additional listings can be made in the comments section if necessary.				
Name of IU:		Category:		Regulated Process:
Radius (Triumph Components)		40 CFR Part 433.12		Metal Finishing
Triumph Structures		40 CFR Part 433.12		Metal Finishing
ORG Chem Group		40 CFR Part 437 Subpart B & C		Oil Treatment or Recovery/ Organics
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. No problems reported.				
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:		Quarterly	Quarterly	N/A
Effluent:		Quarterly	Quarterly	N/A
Sludge:		Bi-Monthly	Per 503	N/A
Organics:				
Influent:		Annual	Annual	Bis(2-ethylexly phthalate)
Effluent:		Annual	Annual	Bis(2-ethylexly phthalate)
Sludge:		N/A	N/A	
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? No upsets reported.				
C. INDUSTRIAL USER CONTROL MECHANISM				
1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? IU permits				
2. How many IU permits (or other control documents) have been issued? 4				
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, I reviewed an IU permit and checked for Items 4-5.**

4. Does the control document contain the following items? List the section of the permit each item is listed under.

An expiration date: **Yes**

Discharge limitations: **Yes**

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: **Yes**

IU reporting requirements: **Yes**

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: **Yes**

Type of sample: **Yes**

Monitoring frequency: **Yes**

Bypass prohibition: **Yes**

Right of entry: **Yes**

Non-transferability: **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 Requirements:
Sampling:		
Categorical IUs	4-5 per year	Twice per year
Other SIUs	4 per year	Twice per year
Non-SIUs	4-5 per year	
Inspection:		
Categorical IUs	1 per year	Once per year
Other SIUs	1 per year	Once per year
Non-SIUs	1 per year	Once per year

Comments: **1 SIU (Alliance Rubber) and permitted but not significant (NPMC Hospital, St. Vincent Hospital, Craighead Cleaners).**

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

3. Are inspections announced or unannounced? **Announced. Inspections conducted via Zoom or Facetime during COVID-19; samples collected by Bill Garner, Inspector.**

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: **Yes**

Verification that approved analytical techniques are used: **Yes**

Verification of IU flow measurement (where required): **Yes**

6. Please describe the overall adequacy of inspection documentation: Program is adequate
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? Monthly review of IU reports
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? Notify IU and require follow-up sample.
18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? Yes; conducted prior to Mr. Brunson.
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: From 1995, Aerocell Structures (Now Triumph Structures) 115 Centennial Drive
Other environmental permits held: No
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): N/A
19. Additional comments on the POTW's inspection and sampling procedures: N/A
<u>E. Enforcement</u>
1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, but there have been no violations in the last several years. Would issue NOV and possible CAO from city.
2. How does the POTW respond to the following violations?
Effluent limitations: Notify and follow-up sample.
Late reports: Phone call
Unpermitted discharges: None
Slug loads or spills: None; have slug control plan included with permit applications.
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)? No significant violators to publish in recent years.

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:

5. Comments on the POTW's enforcement procedures: **N/A**

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? **Yes; Mr. Brunson and Mr. Garner.**

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**

H. EVALUATION AND COMMENTS: No deficiencies identified during PCI.

**PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM**

Name of Industry: Alliance Rubber Company
POTW Name: Hot Springs POTW
Industry Contacts: Trevor Hamilton, Safety Coordinator
Date and Time of Visit: 10:30-10:45 via Facetime
Description of Manufacturing Process: 20,000 sqft rubber band manufacturer. Processes 60,000 lbs natural and synthetic rubber.
Sources of Process Wastewater: Extruded rubber tubing with heat and then rinsed and cooled with city water.
Categorical Industry? No (Significant IU)
Basis for Limits: Local Limits
Point of Application: Final Effluent
Description of Pretreatment Equipment and Procedures: DAF Unit with holding tank (polymer added). Cake press for solids.
Spill Prevention and Solvent Management Procedures: N/A
Sampling Location and Equipment: Adequate sample collection location.

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

INSPECTOR'S NAME:	<u>Travis Harmon</u>	CODE
NAME OF FACILITY:	<u>Hot Springs POTW</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0033880</u>	NPID
DATE OF PCI:	<u>August 18, 2021</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>4</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>3</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

Figure 1. Google Earth location of the City of Hot Springs Davidson Drive POTW.

