

DIVISION OF ENVIRONMENTAL QUALITY

September 21, 2023

Mr. Carl Geffken, City Administrator City of Ft. Smith P.O. Box 1908 Ft. Smith, AR 72902 Email Address: <u>CGeffken@FortSmithAR.gov</u>

RE: Massard WRF Inspection AFIN: 66-01652 Permit No.: AR0021750

Dear Mr. Geffken:

On August 7, 2023, I performed a Compliance Evaluation 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.

Please refer to the "Summary of Findings" section of the inspection report and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to <u>Water-Inspection-Report@adeq.state.ar.us</u>. This response should contain documentation describing the course of action taken to correct each item noted. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e. photos) is due by **October 6, 2023**.

If I can be of any assistance please contact me at <u>Jason.Bolenbaugh@adeq.state.ar.us</u> or 501-682-0659.

Sincerely,

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Jason Bolenbaugh Compliance Branch Manager, Office of Water Quality

(rec)	ENVIRONMENTAL	-	0	F	FICE OF WATER QUALITY				
() (		AF	FIN: 66-01652 PERMIT #: AR002175		750		DATE: 8/7/2023		
\$	AND ENVIRON	СС	OUNTY: 66 Seb	bas	stian Pl		PDS #: <b>126962</b>		MEDIA: WN
		GPS LAT: 35.3420		2 <b>0</b> I	LONG: -94.3080 LOCATION: General Area			al Area	
	FACILITY INFORMAT	ION			INS	SPE		ORN	MATION
	ssard WRF				FACILITY TYPE: <b>1 - Municipal</b>	83	ECTOR ID#: 321 S - Stat	e	
LOCATION: <b>1609 N. 9<sup>th</sup> St.</b> CITY:				FACILITY EVALUATION RATING:     INSPECTION TYPE:       4 - Satisfactory     Compliance Evaluation					
Ва	rling				==(=).	TRY TIM			PERMIT EFFECTIVE DATE: 3/1/2021
RESPONSIBLE OFFICIAL									JITZUZI PERMIT EXPIRATION DATE:
NAME: / TITLE Mr. Carl Geffken / City Administrator									2/28/2026
COMF	PANY:			F	FAYETTEVILLE	SHA	LE RELAT	ED:	N
	y of Ft. Smith			F	FAYETTEVILLE	SHA		ION	IS: N
	NG ADDRESS: <b>D. Box 1908</b>							-	
- /	STATE, ZIP:			- 1	NAME/TITLE/PHONE/FAX/EMAIL	L/ETC.:			
	Smith AR 72902				Mr. Rahul Thukral, Dir. of Operations, Ft. Smith Mr. David Shelley, WRF Supervisor, Ft. Smith				
	9-784-2201 /				Mr. Jonathan Shipley, Program Manager, Fr. Smith				
	ີ Geffken@FortSmithAR.gov				Mr. Randy Vickers, Inspector, DEQ-OWQ				
	NTACTED DURING INSPECTION	No		_					
AREA EVALUATIONS									
(S=Satisfactory, M=Marginal, U=Unsat							A/A 7	TED	
S	PERMIT	S FLOW MEASURE				1			
S	RECORDS/REPORTS	S LABORATORY				3	-		
S	OPERATION & MAINTENANCE	S				3			TORING PROGRAM
S	SAMPLING	<b>S</b> SLUDGE HANDLING/DISPOSAL <b>N</b> PRETREATMENT			MENI				
**	OTHER:								

## SUMMARY OF FINDINGS

The following was noted during the inspection:

- A review of Discharge Monitoring Reports (DMR) was conducted from June, 2020 to May, 2023. During that time the permittee reported 16 effluent limitation violations. Those violations were Ammonia Nitrogen (12), Total Suspended Solids (2), and Fecal Coliform Bacteria (2). The permittee reported three additional Ammonia Nitrogen violations in July, 2023. Exceedances of permit effluent limitation is in violation of Part I, Section A of the permit. On August 21, 2023 the permittee submitted Corrective Action Plan request to the Office of Water Quality Enforcement Branch. No additional response to address this inspection is required at this time.
- The permittee uses paracetic acid (PAA) as the mode for disinfection. A construction permit for the installation of the PAA remains active. Please refer to the comments in the inspection report for Permit AR0021750C on how to proceed with terminating the permit.

#### **GENERAL COMMENTS**

The facility treatment type consists of a bar screen/grit removal, primary clarification, trickling filters, activated sludge, secondary clarifiers, and PAA disinfection. The facility no longer uses UV as the mode for disinfection. The design flow of the facility is 10.0 MGD.

Portions of the facility are powered by two separate substations and companies. One station power is transferred by overhead lines and the other power is transferred by underground lines. This allows for flexibility when one station may lose power. If both stations lose power the facility has priority status for restoring power. The permittee may also reroute wastewater to their Sunny Mead facility located on E. Grand Avenue (35.384821, -94.35737). This station has a 22 million gallon equalization basin that can stored wastewater until such time as it can be routed back to the treatment facility for processing.

The entire plant is on a SCADA system as are the facility's pump stations. The Massard staff can also monitor the operations of the P Street Plant and its associated pump stations but they cannot make operational changes to those using the SCADA.

INSPECTOR'S SIGNATURE:	←Click text to left to add signature	-Inspector Name	DATE:
SUPERVISOR'S SIGNATURE	ann Robenbrag	lason Bolenbaugh	DATE:

# Inspection Report: Massard WRF, AFIN: 66-01652, Permit #: AR0021750

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ONE
DETAILS: No changes to Responsible Official, Cognizant Official, or outfall.	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: Carl Geffkin remains the RO and Lance McAvoy remains the CO.	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: Outfall 001 only	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	ØS OM OU ONA ONE
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:	OS OM OU ONA ØNE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: The permittee maintains detailed operational records and is working towards developing an electronic system to maintain records.	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	ØS OM OU ONA ONE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🖾na 🖾ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🖾ne
<ol> <li>STANDBY POWER OR OTHER EQUIVALENT PROVIDED: The facility does not have any permanent generators on site. They al supported by two different substations (1 overhead and 1 underground) and companies.</li> </ol>	<sup>re</sup> Øs 🗆m 🗇u Øna 🗇ne
<ol> <li>ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: All of the plant is on SCADA. Plant is operated twenty-four hours a day, seven days a week.</li> </ol>	Øs 🖙 🗆 🖛 🖛
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆m 🗇u 🖾na 🖾ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: Plant has fourteen operators on staff.	Øs 🗆m 🗇u 🗇na 🗇ne
<ol> <li>SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: Some minor parts are maintained at the plant but the majority of spare parts are maintained at the permittee's warehouse on Kelly Highway.</li> </ol>	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: Sunny Mead is an alternative facility in which the permittee can divert wastewater to in the event of a massive power outage.	Øy 🗆n 🗆na 🗇ne
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:	Dy On Øna One
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:	Dy On Øna One

SECTION D: SAMPLING							
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE						
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:							
<ol> <li>SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT: BOD<sub>5</sub>/CBOD<sub>5</sub>, TSS, NH<sub>3</sub>-N, DO, FCB, PAA TRC (Cyanide), TP, NO<sub>3</sub>+NO<sub>2</sub>-N, pH</li> </ol>							
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:							
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:							
a. SAMPLES REFRIGERATED DURING COMPOSITING: BOD5/CBOD5, TSS, NH3-N, TP, NO3+NO2-N,							
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? TYPE OF DEVICE: 2' Parshall Flume							
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:							
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: Siemens Model LUT400	ØY 🗆 N 🗆 NA 🗆 NE						
4. CALIBRATION FREQUENCY ADEQUATE:	Øy 🛛 n 🖾 na 🖾 ne						
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:							
<ol> <li>CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: Permittee conducts calibration checks once/month an the contractor once every 6 months. If the deviation exceeds permit requirements the permittee will submit a work ticke have the meter calibrated and adjusted.</li> </ol>							
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	ØS OM OU ONA ONE						
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:	DY DN ØNA DNE						
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:							
4. QUALITY CONTROL PROCEDURES ADEQUATE:							
5. DUPLICATE SAMPLES ARE ANALYZED <u>&gt;10%</u> OF THE TIME:							
6. SPIKED SAMPLES ARE ANALYZED <a>&gt;10%</a> OF THE TIME:							
7. COMMERCIAL LABORATORY USED:	Øy 🛛 n 🖓 na 🖓 ne						
a. LAB NAME: Pace Analytical Services, LLC							
b. LAB ADDRESS: 9608 Loiret Blvd., Lenexa, KS 66219							
c. PARAMETERS PERFORMED: WET Testing only							
8. BIOMONITORING PROCEDURES ADEQUATE: Once/quarter	Øy 🛛 n 🖾 na 🖾 ne						
a. PROPER ORGANISMS USED: Pimephales promelas and Ceriodaphnia dubia	Øy 🛛 n 🖾 na 🖾 ne						
b. PROPER DILUTION SERIES FOLLOWED: 3, 4, 5, 7 (Critical), and 9	ØY 🗆 N 🗆 NA 🗆 NE						
c. PROPER TEST METHODS AND DURATION:							
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	DY DN ØNA DNE						

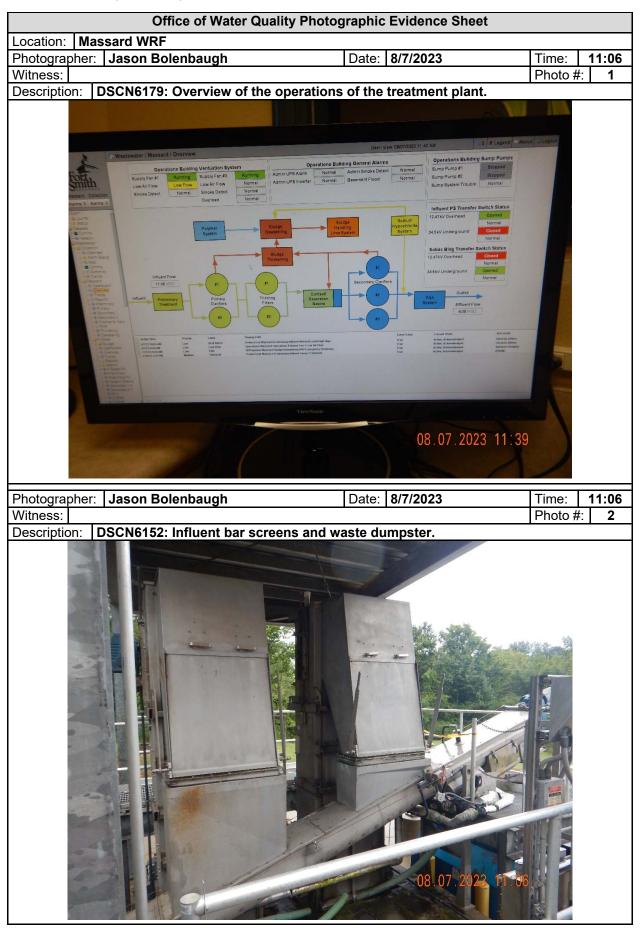
SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS										
BASED ON VISUAL OBSERVATIONS ONLY										
DETAILS: I	Discharge pipe	enters the Arka	insas River. Vis	ual observatior	ns were made at	the flume.				
OUTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COLOR OTHER										
001	No	No	No	No	No	Clear				
		I		L	L		1			
SECTION H	: SLUDGE DIS	POSAL								
SLUDGE D	SPOSAL ME	ETS PERMIT F	REQUIREMEN	ГS		ØS OM O				
DETAILS: \$	Sludge is dewa	tered on site us	ing a belt press	and disposed	of in the Ft. Smit	h Landfill. Haul				
	ely 600 tons/mo		<b>U</b>	•						
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m				
2. SLUDGE RI	ECORDS MAINTAINE	D AS REQUIRED BY 40	) CFR 503:			⊡s ⊡m	□u Øna □ne			
3. FOR LAND	APPLIED SLUDGE, TY	YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE): N	ot Applicable				
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES							
SAMPLE R	ESULTS WITH	HIN PERMIT R	EQUIREMENT	S			IU ⊠NA ⊡NE			
DETAILS: I	No samples we	re collected dur	ing this inspec	tion.						
1. SAMPLES (	OBTAINED THIS INSPI	ECTION:				ΠY	⊡n Øna ⊡ne			
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:						
3. SAMPLES F	PRESERVED:					ΠY	□n Øna □ne			
4. FLOW PRO	PORTIONED SAMPLE	ES OBTAINED:				ΠY	□n Øna □ne			
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DEV	ICE:			ΠY	🗆n 🗹na 🗆ne			
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			ΠY	□n Øna □ne			
7. SAMPLE SF	PLIT WITH PERMITTEI	E:				ΠY	□n Øna □ne			
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				ΠY	□n Øna □ne			
9. SAMPLES (	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY	🗆 n 🗹 na 🗆 ne			
SECTION J	STORM WAT	ER POLLUTION	PREVENTION	PLAN						
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			IU ⊡NA ⊠NE			
DETAILS:	A separate insp	ection of the Pe	ermit ARR00044	19 (no-exposure	exclusion) was	conducted. Ple	ase refer to			
	•	additional detail								
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:							
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:				□n □na Øne			
3. POLLUTION PREVENTION TEAM IDENTIFIED:										
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:										
5. LIST OF POTENTIAL POLLUTANT SOURCES:										
6. LIST OF PC	TENTIAL SOURCES A	AND PAST SPILLS AND	D LEAKS:				□n □na Øne			
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:     Image: Comparison of the second se										
8. LIST OF STRUCTURAL BMPS:										
9. LIST OF NON-STRUCTURAL BMPS:										
10. BMPS PRO	10. BMPS PROPERLY OPERATED AND MAINTAINED:     Image: Comparison of the second se									
11. INSPECTIO	NS CONDUCTED AS	REQUIRED:				ΠY	□n □na Øne			

FLOW CALCULATION SHEET								
Date: 8/7/2023 Time: 10:50								
Head in Inches:   Feet: 1.4								
Type & Size of Primary Flow Measurement Device: <b>24" Parshall Flume</b>								
Name & M	odel of Secondary	Flow Measurem	nent Dev	ice: Siemens	6 Model – LUT 400			
Date of las	t Calibration of Sec	condary Flow De	avica:					
Date of las		condary riow De	54100.					
Recorded I	Flow at Date & Tim	ne Listed Above:	9.13 M	GD	(Facility Flow Meter)			
Calculated	Flow at Date & Tir	me Listed Above	· 8 709	MGD				
-	ited using flow charts in: 1			-	5 <sup>th</sup> Edition)			
				1 1				
% Error =	Recorded Value	_	d Value	X 100				
		Calculated Value						
o/ E	9.13	- 8.70	9	X 400				
% Error =		8.709		X 100				
				· ·				
% Error =	.421	- X 100						
8.709								
% Error = <b>0.048</b> X 100								
% Error = <b>4.83</b> %								
Openness for Flow monocuring device monocuring flow within 1.400/ from two								
Comments: Flow measuring device was measuring flow within ± 10% from true discharge.								

## **DMR Calculation Check**

Reporting Period:	From	2022	04	01	То	2022	04	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		BOD₅	-					
		Loading Mass				Concer Mon		
	Mo.	Avg Ibs/d	ay	Mo. A	vg r		7-day Avg	mg/l
Reported Value:		1649			13.06		16.9	)
Calculated Value:		1649			13.06		16.9	)
Permit Value:		2502			30		45	

If calculated value does not equal reported value, explain:

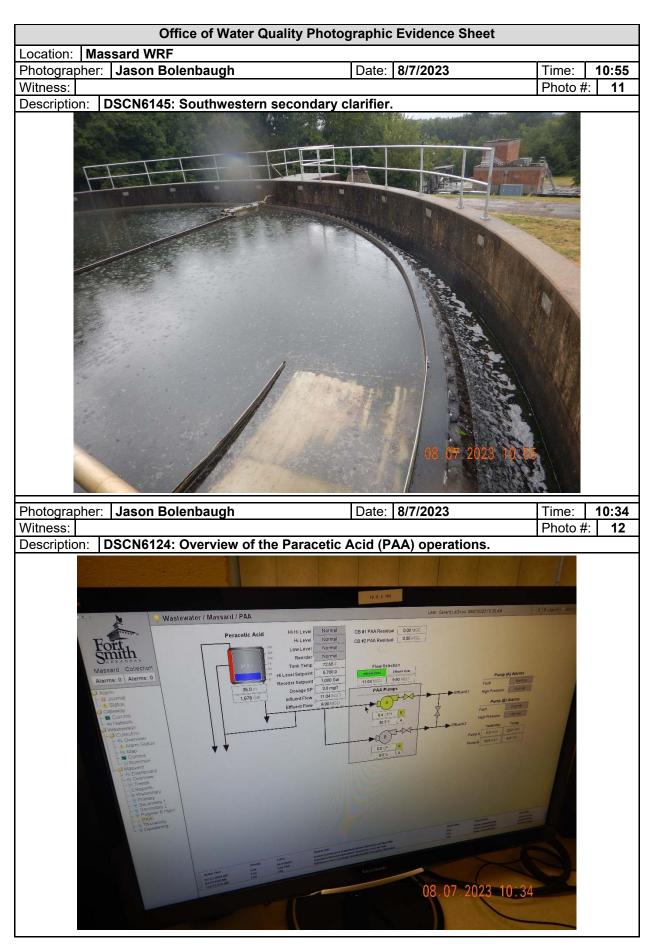




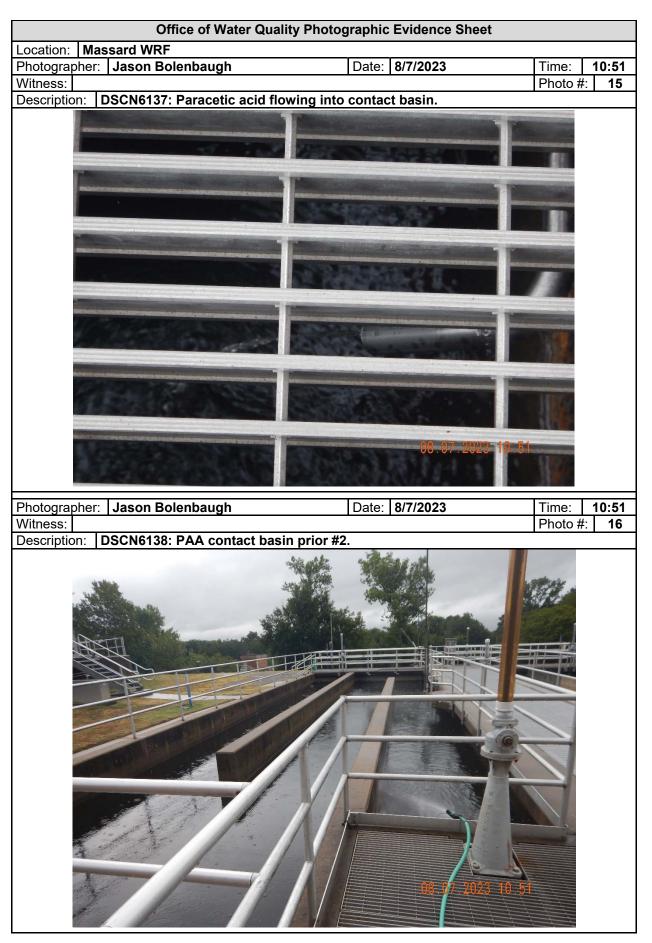




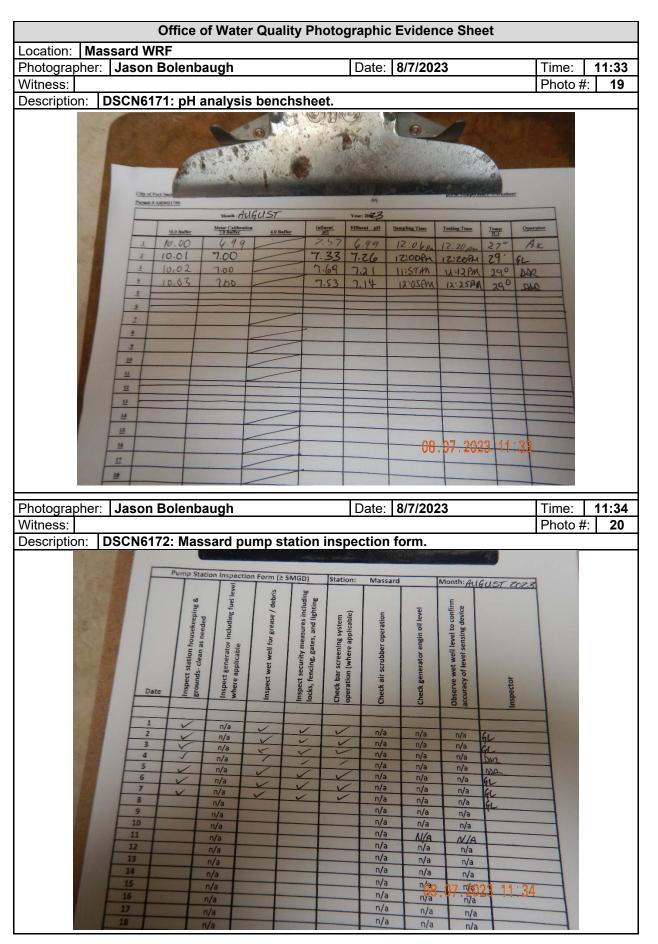


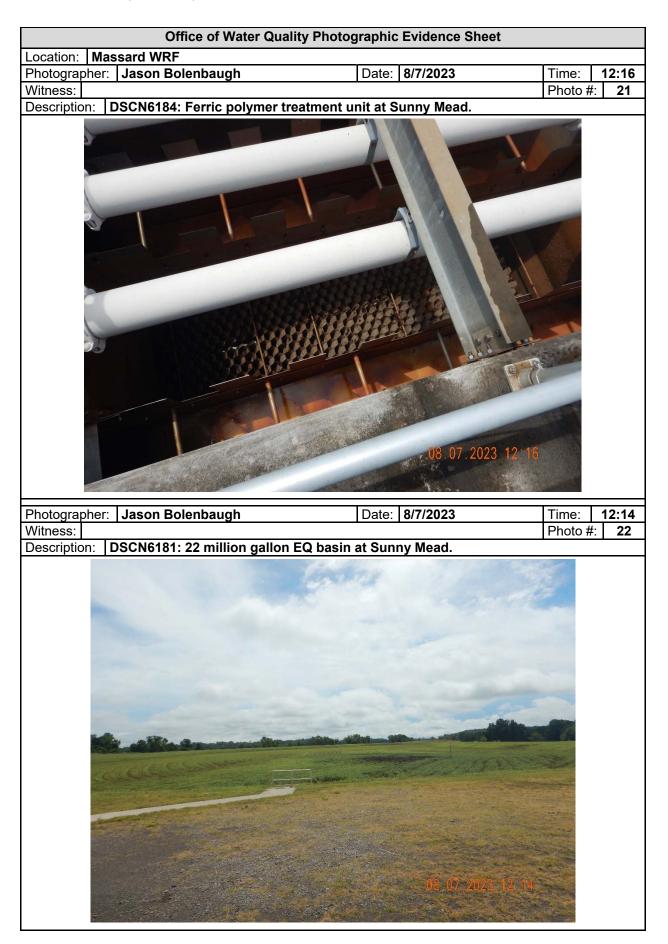














#### NOTICE OF COMPLETION OF CONSTRUCTION FOR STATE CONSTRUCTION PERMITS

## Permit Number: AR0021750C

#### I. PERMITTEE INFORMATION

Permittee Legal Name :	City of Fort Smith			Permittee	ее Туре:	
Permittee Mailing Address:	801 Carnall Ave, Suite 500	)	STA1	TE 🗌	] PARTNE	ERSHIP
City:	Fort Smith		FEDH	ERAL	] CORPOR	ATION*
State:	AR Zip: 7	/2901	SOLE	E PROPRIETO	ORSHIP	
Permittee Telephone Number:	479-494-3909		*State of	Incorporation	:	
Permittee Fax Number:			E-mail:	LMcAvoy@For	tSmithAR.go	v
II. FACILITY SITE INF	ORMATION					
Facility Name: Mas	sard Water Reclamation Facility	Facility	Contact Person:	Lance McAvoy		
Facility County: Seb	astian	Facility P	hysical Address:	1609 9th Street		
Telephone Number: 479-	494-3909		Facility City:	Barling	Zip:	72923
When was construction completed?			1	Date: 05/11/20	22	

Was construction completed in accordance with the approved plans and specifications? If not, what changes were made? Attach page(s) if necessary.

#### III. RESPONSIBLE OFFICIAL AND PROFESSIONAL ENGINEER CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

No Yes

NOTE: The responsible official and the professional engineer must both sign this form.

Responsible Official Name: Carl Geffken	Title: City Administrator
Responsible Official Signature:	Date: 9252023
Professional Engineer Name: Elizabeth Heiles	Title: Senior Associate
Professional Engineer Signature:	Date: 8-15-23
Stamp of Professional Engineer	
LICENSED	
ENGINEER 	
NOTE: This form can be submitted the mail fax, ePonte of electronic mail to Water-Permit-Application	adeq.state.ar.us.
Office of Water Quality	2   Ear (501) 692 0890
5301 Northshore Drive   North Little Rock, Arkansas 72118-5317   Phone (501) 682-062 www.adeg.state.ar.us	2   Fax (301) 002-0000



# DIVISION OF ENVIRONMENTAL QUALITY

October 24, 2023

Carl Geffken, City Administrator City of Fort Smith Massard Water Reclamation Facility 801 Carnall Ave, Suite 500 Fort Smith, AR 72901

Re: State Construction Permit Number AR0021750C - AFIN 66-01652

Dear Mr. Geffken:

The Division of Environmental Quality received the Notice of Completion of Construction form as required by Condition 3 of the above referenced state construction permit on September 29, 2023. According to the form, the construction project was completed in accordance with the plans and specifications provided to the Division as part of the application for the above referenced state construction permit. Therefore, State Construction Permit AR0021750C has been terminated as requested.

Should you have any questions or need additional information concerning this submittal, please contact Daniela Gomez at (501) 682-0914 or by email at daniela.gomez@adeq.state.ar.us.

Sincerely,



Stacie R. Wassell Associate Director, Office of Water Quality

cc: David Ramsey, ICIS Program Coordinator, Office of Water Quality Jason Bolenbaugh, Compliance Branch Manager, Office of Water Quality Richard Healey, Enforcement Branch Manager, Office of Water Quality Carl Geffken, City Administrator: cgeffken@fortsmithar.gov Lance McAvoy, Deputy Director of Operations: lmcavoy@fortsmithar.gov