

October 28, 2010

Mr. Rufus Torrence
Arkansas Dept. of
Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Dear Mr. Torrence:

On September 15, 2008, a request for program modification to Part III 9 "Contributing Industries and Pretreatment Requirements" of NPDES Permit numbers AR0021750 and AR0033278 was sent to Ms. Kimberly A. Fuller P.E ADEQ NPDES Engineer Supervisor. Specifically, it was requested that modification be made to Part III 9, D, annual reporting submittal requirements. It was requested that the aforementioned NPDES permits be modified to include a submittal date in either mid to late September or early October of each year to allow adequate time to complete compliance calculations and meet reporting requirements. This request was granted making this report now due in October of each year.

In compliance with this requirement, enclosed you will find the City of Fort Smith's Pretreatment Annual Report for the compliance year of August 1, 2009 through July 31, 2010. The information for this report is submitted via required Attachments; A - titled, "Pretreatment Program Status Report, Updated Industrial Users List" and B - titled, "Significant Violations - Enforcement Actions".

As you will note on Attachment A, two SIUs no longer discharge to our facilities. Twin River Foods, Inc. (Hwy 45) ceased operations and closed their facility. Gerber Products Co. is now a direct discharging industry. You will also note that one new facility has been added, Mars Petcare.

Also enclosed you will find a copy of the "Notice of Significant Violations" which was published on October 27, 2010, summaries of all influent and effluent analyses performed pursuant to conditions 1(c) of the City's NPDES Permits, and a copy of the Environmental Protection Agency's "Pretreatment Performance Summary" (PPS). Additionally, no interference, pass through, upset or POTW permit violations could be attributed to SIUs.

If you have any questions, please don't hesitate to contact me.

Sincerely,

Paul R. Easley
Environmental Manager

Utility Department • 3900 Kelley Hwy.
Fort Smith, Arkansas 72904
(479) 784-2231 • FAX (479) 784-2358



October 28, 2010

Ms. Nancy Williams
EPA, Region 6 (6EN-WC)
Water Enforcement Branch
1445 Ross Avenue
Dallas, Texas 75202-2733

Dear Ms. Williams:

On September 15, 2008, a request for program modification to Part III 9 "Contributing Industries and Pretreatment Requirements" of NPDES Permit numbers AR0021750 and AR0033278 was sent to Ms. Kimberly A. Fuller P.E ADEQ NPDES Engineer Supervisor. Specifically, it was requested that modification be made to Part III 9, D, annual reporting submittal requirements. It was requested that the aforementioned NPDES permits be modified to include a submittal date in either mid to late September or early October of each year to allow adequate time to complete compliance calculations and meet reporting requirements. This request was granted making this report now due in October of each year.

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Sincerely,

Paul R. Easley
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ATTACHMENT A
PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User	SIC Code (s)	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (C, NC, or SNC)			Permit Limits
			Y/N	Last Action				BMR	Reports		
									90-day Compliance	Semi Annual	
City of Arkoma, OK	9131, 9111, 9121		Y	02/01/08		1	16		C	C	NC - pH
Exide Technologies	3691	40 CFR 461	Y	12/14/09		1	24		C	C	NC - TSS
Fort Smith Industrial	7218		Y	03/01/06		1	12		C	C	C
Fort Smith Plating Co., Inc.	3471	40 CFR 413	Y	06/30/07		1	13		C	C	C
Gerdau MacSteel	3312	40 CFR 420	Y	12/31/09		1	14		C	C	SNC - Zn
Hickory Springs Mfg. Co.	3469, 3429, 3086, 2297	40 CFR 433	Y	09/01/10		1	14		C	C	NC - Oil & Grease
Hiland Dairy Co.	2026, 2086		Y	12/31/08		1	26		C	C	SNC - BOD
Hiram Walker Pernod Ricard USA	2085, 5182		Y	01/01/05		1	12		C	C	NC - BOD
Mars Petcare	2047		Y	11/01/09	X	1	16		C	C	NC - BOD, TSS
Owens Corning Composite Materials LLC.	2297, 3296		Y	07/01/06		1	15		C	C	C
QualServ Corp. - Ft. Smith Division	2541, 2511	40 CFR 433	Y	07/31/08		1	*		C	C	C
Rheem Mfg. Co.	3585	40 CFR 433	Y	07/01/10		1	12		C	C	NC - Ni, Zn
Southern Steel & Wire Co.	3496	40 CFR 433	Y	11/01/05		1	22		C	C	SNC - Zn
Sparks Regional Medical Center	8062		Y	08/01/06		1	24		C	C	C
St. Edwards Mercy Medical	8062		Y	09/01/06		1	14		C	C	NC - TSS
Trane	3585	40 CFR 433	Y	11/01/05		1	25		C	C	NC - Zn
Twin Rivers Foods (Navy Road)	2015		Y	11/01/06		1	24		C	C	SNC - BOD
Whirlpool Corp.	3632, 3639		Y	08/31/10		1	13		C	C	C

Note(s): * Permittee maintained a zero discharge status in CY 09/10

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: August 1, 2009

To: July 31, 2010

TREATMENT PLANT: "P" Street WWTP

NPDES PERMIT #: AR0033278

AVERAGE POTW FLOW: 12.94 MGD

% IU Flow: 5%

METALS, CYANIDE and PHENOLS (Total)	MAHC (ug/L) (2)	INFLUENT DATES SAMPLED (ug/L) Once/quarter				WQ level/ limit (ug/L) (2)	EFFLUENT DATES SAMPLED (ug/L) Once/quarter				LABORATORY ANALYSIS			
		08/25/09	12/06/09	02/07/10	05/02/10		08/25/09	12/06/09	02/07/10	05/02/10	EPA MQL (ug/L) (1)	EPA Method Used (1)	Detection Level Achieved (ug/L)	
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	0	60	200.8	60
Cadmium		0	0	0	0		0	0	0	0	0	0.5	200.8	0.5
Copper		39	13	12	25		3.4	3.2	3.3	3.1	3.1	0.5	200.8	0.5
Lead		3.9	1.8	11	4.4		0	0	8.8	0	0	0.5	200.8	0.5
Mercury		0.11	0.02	0.017	0		0	0	0	0	0	0.005	245.7	0.005
Nickel		6.8	2.3	3.6	5.2		6.1	3.1	3.3	4.0	4.0	1.5*	200.8	0.5
Selenium		0	0	0	0		0	0	0	0	0	5	200.8	5
Silver		0.9	0	0	0		0	0	0	0	0	0.5	200.8	0.5
Zinc		140	52	68	1300		48	46	44	160	160	20	200.8	20
Chromium		0	0	0	0		0	0	0	0	0	10	200.8	10
Cyanide		0	16	0	0		0	0	0	0	0	10	SM4500-CN,C,E	10
Arsenic		2.2	0	0	0.52		0.87	0	0	0	0	0.5	200.8	0.5
Molybdenum		0	0	0	0		0	0	0	0	0	--	200.8	8
Phenols	N/A	99	87	24	34		7.5	6.0	0	7.0	7.0	5	420.1	5
Beryllium		0	0	0	0		0	0	0	0	0	0.5	200.8	0.5
Thallium	N/A	0	0	0	0		0	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	9,055	9,161	16,252	8,352		7,159	7,724	14,905	6,873	6,873			

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. Analytical MQLs should be used so that the data can also be used for Local Limits assessment and NPDES application purpose.

(2) This value was calculated during the development of TBLL based on State WQ Standards and implementation procedures.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity in which they were detected.

MAHL - Maximum Allowable Headworks Level

WQ - Water Quality

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

TREATMENT PLANT: Massard WWTP REPORTING YEAR: August 1, 2009 To: July 31, 2010
 NPDES PERMIT #: AK0021750
 AVERAGE POTW FLOW: 8.4 MGD % IU Flow: 7%

METALS, CYANIDE and PHENOLS	MAHC (ug/L) (2)	INFLUENT DATES SAMPLED (ug/L) Once/quarter				WQ level/ limit (ug/L) (2)	EFFLUENT DATES SAMPLED (ug/L) Once/quarter				LABORATORY ANALYSIS		
		10/25/09	01/27/10	04/11/10	07/18/10		10/25/09	01/27/10	04/11/10	07/18/10	EPA MQL (ug/L) (1)	EPA Method Used (1)	Detection Level Achieved (ug/L)
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8	60
Cadmium		5.6	1.1	4.7	1.8		0	0	0	0	0.5	200.8	0.5
Copper		180	21	150	76		2.2	2.3	4.0	4.8	0.5	200.8	0.5
Lead		31	6	19	13		0	0	0	0	0.5	200.8	0.5
Mercury		0.710	0.066	0.088	0.048		0.012	0.0056	0	0.0045	0.005	245.7	0.0018
Nickel		30	7	24	17		3.5	2.0	6.1	5.6	1.5*	200.8	0.5
Selenium		0	0	0	0		0	0	0	0	5	200.8	5
Silver		8.7	0.0	7.6	13.0		0	0	0	0	0.5	200.8	0.5
Zinc		900	290	1200	420		25	29	34	41	20	200.7/200.8	20
Chromium		28	0	0	16		0	0	0	0	10	200.8	10
Cyanide		0	0	0	0		0	0	0	0	10	SM4-500-CN,C,E	10
Arsenic		3.3	0.87	2.5	2.3	N/A	0	1	0	0.59	0.5	200.8	0.5
Molybdenum		0	0	21	23	N/A	0	0	17	16	--	200.8	8
Phenols	N/A	54	8.2	60	30	N/A	0	0	0	0	5	420.1	5
Beryllium	N/A	0.55	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A	7,600	9,602	7,351	5,901	N/A	11.1	9.2	6.3	10.7			
Bis(2-ethylhexyl)phthalate				3.7								625	2.5
Di-n-butyl phthalate				2.9								625	2.5
Phenol				2.4								625	1.5
Chloroform				2.8	1.9							624	1.6

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. Analytical MQLs should be used so that the data can also be used for Local Limits assessment and NPDES application purpose.

(2) This value was calculated during the development of TBLL based on State WQ Standards and implementation procedures

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity in which they were detected.

MAHL - Maximum Allowable Headworks Level

WQ - Water Quality

ATTACHMENT PPS

METALS AND CYANIDE	RECOMMENDED EPA TEST METHOD	
	REQUIRED MQL (µg/L)	EPA APPROVED TEST METHOD
Antimony, Total Recoverable	60	200.7
Arsenic, Total Recoverable	10	206.2
Beryllium, Total Recoverable	5	200.7
Cadmium, Total Recoverable	1	213.2
Chromium, Total Recoverable	10	200.7
Chromium (6+), Dissolved	10	218.4
Copper, Total Recoverable	10	220.2
Lead, Total Recoverable	5	239.2
Mercury, Total Recoverable	0.005	245.7
Nickel, Total Recoverable	40	200.7
Selenium, Total Recoverable	5	270.2
Silver, Total Recoverable	2	272.2
Thallium, Total Recoverable	10	279.2
Zinc, Total Recoverable	20	200.7
Phenols, Total Recoverable	5	420.1
Cyanide, Total Recoverable	20	335.2

PRETREATMENT PERFORMANCE SUMMARY (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT EPA AUTHORIZATION.

I. General Information

Control Authority Name City of Fort Smith

Address 3900 Kelley Hwy

City Fort Smith State/Zip Arkansas, 72904

Contact Person Paul R. Easley Environmental Manager
(Position)

Contact Telephone: (479) 784-2337

NPDES Permit Nos. AR0033278, AR0021750

Reporting Period August, 2009 July, 2010
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs 8

Total Number of Significant Noncategorical IUs 10

II. Significant Industrial User Compliance

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	<u>Categorical</u>	<u>Noncategorical</u>
1) No. of SIUs Submitting BMRs/Total No. Required		<u>N/A</u>	<u>N/A</u>
2) No. of SIUs Submitting 90 -Day Compliance Reports/No. Required		<u>N/A</u>	<u>N/A</u>
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required		<u>8/8</u>	<u>10/10</u>
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule		<u>0/0</u>	<u>1/1</u>
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs		<u>2/8</u>	<u>2/10</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)		<u>22%</u>	

III. Compliance Monitoring Program

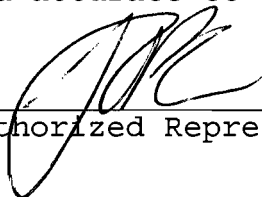
1) No. of Control Documents Issued/Total No. Required	<u>8/8</u>	<u>10/10</u>
2) No. of Nonsampling Inspections Conducted	<u>8/8</u>	<u>10/10</u>
3) No. of Sampling Visits Conducted	<u>124</u>	<u>172</u>
4) No. of Facilities Inspected (nonsampling).	<u>8/8</u>	<u>10/10</u>
5) No. of Facilities Sampled	<u>8/8</u>	<u>10/10</u>

IV. Enforcement Actions

	<u>SIGNIFICANT CATEGORICAL</u>	<u>INDUSTRIAL USERS Noncategorical</u>
1) No. of Compliance Schedules Issued/No. of Schedules Required.	<u>0/0</u>	<u>1/1</u>
2) No. of Violations Issued to SIUs	<u>31</u>	<u>55</u>
3) No. of Administrative Orders Issued to SIUs	<u>0/0</u>	<u>1/1</u>
4) No. of Civil Suits Filed	<u>0/0</u>	<u>0/0</u>
5) No. of Criminal Suits Filed	<u>0/0</u>	<u>0/0</u>
6) No. of Significant Violators (attach newspaper publication)	<u>2/8</u>	<u>2/10</u>
7) Amount of Penalties Collected (total dollars/IUs assessed)	<u>\$0/0</u>	<u>\$0/0</u>
8) Other Actions (sewer bans, etc.)	<u>0/0</u>	<u>0/0</u>

The following certification must be signed for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.



Authorized Representative

October 29, 2010

Date

