



September 30, 2021

Pretreatment Submittals
Arkansas Dept. of
Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Dear Sir/Madam:

Enclosed you will find the City of Fort Smith's Pretreatment Annual Report for the compliance year of August 1, 2020 through July 31, 2021. 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".

Also enclosed you will find 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,

A handwritten signature in blue ink that reads "Don Clover".

Don Clover
Environmental Program Manager

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 Don Clover Environmental Manager
(Position)

Contact Telephone: (479)784-2337

NPDES Permit Nos. AR0033278, AR0021750

Reporting Period August, 2020 July, 2021
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs 10

Total Number of Significant Noncategorical IUs 11

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>1/1</u>	<u>N/A</u>
2) No. of SIUs Submitting 90 -Day Compliance Reports/No. Required	<u>0/0</u>	<u>N/A</u>
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required	<u>10/10</u>	<u>11/11</u>
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule	<u>0/0</u>	<u>0/0</u>
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs	<u>0/10</u>	<u>0/11</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>0%</u>	

III. Compliance Monitoring Program

1) No. of Control Documents Issued/Total No. Required	<u>10/10</u>	<u>11/11</u>
2) No. of Nonsampling Inspections Conducted .	<u>10/10</u>	<u>11/11</u>
3) No. of Sampling Visits Conducted	<u>76</u>	<u>161</u>
4) No. of Facilities Inspected (nonsampling).	<u>10/10</u>	<u>11/11</u>
5) No. of Facilities Sampled	<u>5/10</u>	<u>10/11</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>0/0</u>
2) No. of Violations Issued to SIUs	<u>7</u>	<u>14</u>
3) No. of Administrative Orders Issued to SIUs	<u>0/0</u>	<u>0/0</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>0/10</u>	<u>0/11</u>
7) Amount of Penalties Collected (total dollars/IUs assessed)	<u>0/0</u>	<u>\$700/2</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.



9-23-2021

Authorized Representative

Date

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: From: August 1, 2020

To: July 31, 2021

TREATMENT PLANT:

P Street

NPDES PERMIT #: AR0033278

AVERAGE POTW FLOW:

11.9

% 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					
		10/20/20	01/12/21	04/20/21	07/20/21		10/20/20	01/12/21	04/20/21	07/20/21	EPA MQL (ug/L) (1)	EPA Method Used (1)	Detection Level Achieved (ug/L)			
Antimony	N/A	ND	ND	ND	ND	N/A	ND	ND	ND	ND	ND	ND	60	200.8	60	
Cadmium	107.3	ND	ND	ND	ND	71.6	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5	
Copper	1000	24	14.0	12	19	244.1	3.1	2.9	3.2	2.0	2.0	2.0	0.5	200.8	0.5	
Lead	1000	4.1	4.8	6.6	2.0	304.8	ND	0.50	0.6	ND	ND	ND	0.5	200.8	0.5	
Mercury	2.91	0.05	0.035	0.024	0.054	0.2	ND	ND	ND	ND	ND	ND	0.005	245.7	0.0050	
Nickel	738.8	3.5	2.7	2.0	2.7	7817.9	2.0	1.9	1.9	2.0	2.0	2.0	0.5	200.8	0.5	
Selenium	93.9	ND	ND	ND	ND	77.9	ND	ND	ND	ND	ND	ND	5	200.8	5	
Silver	250	ND	0.98	0.62	ND	63.7	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5	
Zinc	300	310	230	150	69	1957.7	77	33	50	44	20	20	20	200.8	20	
Chromium	1000	ND	ND	ND	ND	12828.6	ND	ND	ND	ND	ND	ND	10	200.8	10	
Cyanide	100	ND	ND	ND	ND	87.1	40	ND	ND	ND	ND	ND	10	SM4500-CN C,E	10	
Arsenic	100	19.0	6.8	9.7	12.0	2719.4	3.5	3.50	4.9	2.00	0.5	0.5	0.5	200.8	0.5	
Molybdenum	200	ND	ND	ND	ND	N/A	ND	ND	ND	ND	ND	ND	--	200.8	8	
Phenols	N/A	41	51	62	14	N/A	ND	ND	ND	ND	ND	ND	<5	420.1	5	
Beryllium	100	ND	ND	ND	ND	89.9	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5	
Thallium	N/A	ND	ND	ND	ND	N/A	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5	
Flow, MGD	N/A					N/A										
Toluene					ND										624	10.0

(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 (I) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: From: August 1, 2020 To: July 31, 2021

TREATMENT PLANT: Massard NPDES PERMIT #: AR0021750

AVERAGE POTW FLOW: 9.6 % IU Flow: 6%

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				
		10/20/20	01/13/21	04/20/21	07/21/21		10/20/20	01/13/21	04/20/21	07/21/21	EPA MQL (ug/L) (1)	EPA Method Used (1)	Detection Level Achieved (ug/L)		
Antimony	N/A	ND	ND	ND	ND	N/A	ND	ND	ND	ND	ND	ND	60	200.8	60
Cadmium	98.3	ND	ND	ND	ND	80.4	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5
Copper	1000	16.0	15.0	12.0	8.5	464.4	4.7	4.0	5.7	3.2	0.5	200.8	0.5	200.8	0.5
Lead	1000	2.2	5.2	1.4	3.1	304.8	ND	ND	ND	0.9	0.5	200.8	0.5	200.8	0.5
Mercury	3.4	0.0084	0.035	0.032	0.071	0.2	0.0300	ND	ND	ND	0.005	245.7	0.0050	200.8	0.0050
Nickel	1000	2.8	4.4	3.7	3.3	7817.9	2.7	2.7	2.9	3.1	0.5	200.8	0.5	200.8	0.5
Selenium	96.4	ND	ND	ND	ND	84.9	ND	ND	ND	ND	5	200.8	5	200.8	5
Silver	250	ND	ND	ND	ND	121.1	ND	ND	ND	ND	0.5	200.8	0.5	200.8	0.5
Zinc	300	920(4)	180	160	120	3723.8	32	29	36	27	20	200.8	20	200.8	20
Chromium	1000	ND	ND	ND	ND	18127.6	ND	ND	ND	ND	10	200.8	10	200.8	10
Cyanide	100	ND	ND	ND	ND	88.2	ND	ND	ND	ND	10	SM4500-CN,C,E	10	200.8	10
Arsenic	100	15.0	14.0	16.0	9.5	5172.6	24.00	7.30	13.00	4.30	0.5	200.8	0.5	200.8	0.5
Molybdenum	200	ND	ND	ND	ND	N/A	ND	ND	ND	ND	--	200.8	8	200.8	8
Phenols	N/A	14	77	310	24	N/A	31	14	12	ND	5	420.1	5	200.8	5
Beryllium	100	ND	ND	ND	ND	89.9	ND	ND	ND	ND	0.5	200.8	0.5	200.8	0.5
Thallium	N/A	ND	ND	ND	ND	N/A	ND	ND	ND	ND	0.5	200.8	0.5	200.8	0.5
Flow: MGD	N/A					N/A									

(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 TBL 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.

(4) Zinc result was from a secondary dilution factor of 10. This made the reporting limit for this zinc result 200 ug/L instead of the normal 20 ug/L.

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

ATTACHMENT A
PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User	SIC/NAICS 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		Self Monitoring	
									90-day Compliance	Semi Annual		
ABB Die Casting	331523	40 CFR 464	Y	8/22/2019		1	*			C	C	N/A
Baptist Health- Fort Smith	8062		Y	09/22/16		1	20			C	C	C
City of Arkoma, OK	9131, 9111, 9121		Y	01/31/18		1	20			C	C	NC - BOD
Stylen Manufacturing (GNB-Bxide)	3691	40 CFR 461	Y	10/31/16		1	22			C	C	NC - Lead (Daily Max & Monthly Avg)
Fedarm	332992, 332994	40 CFR 433	Y	08/20/19		1	*			C	C	N/A
Fort Smith Plating Co., Inc.	3471	40 CFR 413	Y	07/01/17		1	15			C	C	C
Gerdau Macsteel	3312	40 CFR 420	Y	10/21/16		1	10			C	C	NC - Zinc (Daily Max & Monthly Avg)
Glatfelter	313230		Y	09/12/17		1	19			C	C	C
Hickory Springs Mfg. Co.	3469, 3429, 3086, 2297	40 CFR 433	Y	10/18/16		1	13			C	C	C
Hiland Dairy Co.	2026, 2086		Y	01/09/17		1	12			C	C	NC - BOD
Hiram Walker Pernod Ricard USA	2085, 5182		Y	09/21/16		1	12			C	C	C
Hytrol Manufacturing	333922, 3535	40 CFR 433	Y	05/24/21	Y	1	*					N/A
Kraft-Heinz	2068		Y	09/27/16		1	15			C	C	C
Mars Petcare	2047		Y	09/21/16		1	14			C	C	C
Owens Corning Composite Materials LLC.	2297, 3296		Y	09/22/16		1	16			C	C	C
QualServ Corp. - Ft. Smith Division	2541, 2511	40 CFR 433	Y	10/21/16		1	*			C	C	N/A
Silgan Plastics	3089	40 CFR 463	Y	08/20/19		1	*			C	C	N/A
Simmons Prepared Foods	2015		Y	01/01/17		1	13			C	C	NC - BOD
Mercy Hospital Fort Smith	8062		Y	09/22/16		1	22			C	NC	NC - BOD, TSS
Solder Plating	3449, 3469, 3643, 3599, 3479, 3471	40 CFR 433	Y	03/01/19		1	16			C	C	C
Twin River Foods	2015		Y	12/04/20	Y	1	*			C	C	N/A

Note(s) : * Permittee maintained a zero discharge status in CY 20/21
 Highlighted SIUS had a company name change

ATTACHMENT B
SIGNIFICANT VIOLATIONS - ENFORCEMENT ACTIONS TAKEN

Industrial User	Nature of Violation		Number of Action(s) Taken					Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other		Date Issued	Date Due		
City of Arkoma, OK		X	1								C	
Gerdau MacSteel		X	4								C	
Hiland Dairy		X	1								C	
Mercy Hospital Fort Smith	X	X	8				400.00				C	
Stryten Manufacturing (Exide)		X	3								C	
Simmons Prepared Foods		X	1				300.00				C	

CITY OF FORT SMITH PRETREATMENT PROGRAM NOTICE OF SIGNIFICANT VIOLATIONS

As directed by the U.S. Environmental Protection Agency in the City of Fort Smith's National Pollutant Discharge Elimination System (NPDES) Permits, public notice of major significant violators of the City of Fort Smith's Wastewater Pretreatment program is hereby given. A significantly violating Significant Industrial User (SIU) is one that meets one or more of the following criteria (from 40 CFR part 403.8 (f)(2)(vii)):

- A. Chronic violations of wastewater limits, defined here as those in which sixty-six percent or more of all measurements taken during a six month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter;
- B. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent or more of all of the measurements for each pollutant parameter taken during a six month period equal or exceed the product of the daily maximum or the average limit multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease; and 1.2 for all other pollutants except pH.);
- C. Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the Control Authority determines has caused, alone or in combination with other discharges, interference or pass through at the Publicly Owned Treatment Works (POTW) (including endangering the health of POTW personnel or the general public);
- D. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of the above cited CFR, to halt or prevent such a discharge;
- E. Failure to meet, within 90 (ninety) days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;
- F. Failure to provide, within 30 (thirty) days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- G. Failure to accurately report non-compliance;
- H. Any other violation or group of violations that the Control Authority determines will adversely affect the operation or implementation of the local pretreatment program.

The SIU's that were in significant violation for the period of August 1, 2020 through July 31, 2021 are as follows:

1. SIU's in Significant Violation of Pollutant Limitations: None
2. SIU's in Significant Violation of Reporting Requirements: None