

Wilson, Tabatha

From: Torrence, Rufus
Sent: Wednesday, October 09, 2013 12:59 PM
To: Mcavoy, Lance
Cc: Wilson, Tabatha
Subject: AFIN 66-00226 AR0021750 & AR0033278 City of Fort Smith 2012 Annual Report
Attachments: AR0021750_2011 Annual Report ADEQ Review_20121108.pdf; Fort Smith Letter 20121219.pdf; FTSM Annual Report 2012.pdf

ADEQ

ARKANSAS
Department of Environmental Quality

October 8, 2013

Lance McAvoy
Utility Department
3900 Kelley Hwy
Fort Smith, Arkansas 72904

Re: City of Fort Smith Pretreatment Annual Report 2012
(Permit No. AR0021750, AFIN 66-00226)

The Department has reviewed the City's 2012 Annual Report and the report is complete. However, the Department has concerns about the status of the local limits.

Based on the review of the 2012 annual report, the City has placed several industries in SNC for BOD and TSS violations. Referring to the attached letter dated November 6, 2012, the Department has recommended that local limits for BOD and TSS are not necessary at this time. In the City's letter dated December 19, 2012, the City planned to conduct a new TBLL study and submit it to ADEQ for approval. The Department has not received this study. Furthermore, the City did not report BOD and TSS loadings in the 2012 annual report. The Department will not require the City to amend the 2012 annual report.

The status of the need for local limits is indeterminate at this time. Hence, the Department recommends that when SIU permits expire, the City should not include local limits in permit renewals until a new TBL study is conducted and approved.

The Department appreciates the City's continued efforts in annual reporting.

If the City has any questions, please feel free to contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us

Sincerely,



Rufus Torrence, ADEQ Engineer

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5301 NORTHSORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0626
www.adeq.state.ar.us

From: Torrence, Rufus
Sent: Thursday, November 08, 2012 8:26 AM
To: 'Mcavoy, Lance'
Subject: AR0021750 AFIN 66-00226 & AR0033278 AFIN 66-001653 City of Fort 2011 Annual Report Review by ADEQ
Attachments: Ltr Contaminated Sampling Point 20121105.pdf; TBLL Massard 20121030 Local_Limit Worksheet.pdf; TBLL P ST 20121030 Local_Limits Worksheet.pdf; FTSM 2011 Annual Report.pdf; TBLL Massard Plant BOD TSS Data.pdf; Inf-Eff Chart Massard.doc; Inf-Eff Chart P St.doc



November 6, 2012

Lance McAvoy
Utility Department
3900 Kelley Hwy
Fort Smith, Arkansas 72904

Re: City of Fort Smith 2011 Annual Report
(Permit No. AR0021750, AFIN 66-00226)

Dear Mr. McAvoy:

The Department has reviewed the City's 2011 Annual Report. The report has been deemed "complete". However, the City has demonstrated that local limits for BOD₅ and TSS are not necessary at this time. Nonetheless, the department will review the BOD₅ and TSS Maximum Allowable Headworks Loads (MAHLs) annually to ensure no significant increase in loadings. Therefore, the Department is asking the City to report quarterly BOD₅, TSS and NH₃-N loadings in future annual reports. Please find attached updated Influent-Effluent charts. The chart shows loadings for BOD₅, TSS and NH₃-N. The City should review the attached Excel spreadsheets (PDF copies) which show the derivation of the loadings for each plant. Copies of the Excel Workbooks with supporting documentation are available upon request.

Attached to a letter dated September 28, 2012, the City submitted BOD₅ and TSS data for the Massard plant (see attached data). The City recorded BOD₅ and TSS peaking loadings at 35,618 and 107,753 lbs/day, respectively. The Oct 2010 TSS loading appears to be a slug load to the POTW. In the City's letter dated December 7, 2011, find this comment:

"The influent sample collection point is a distribution structure where return sludge was introduced at a point prior to our only available influent sample collection point. During the course of recent construction, this return sludge line was to have been either disconnected and/or relocated to a point that would not be commingle waste sludge with raw WWTP influent, thereby eliminating the possibility of sample contamination and providing us with an adequate sampling point."

The first quarter influent results dated October 31, 2011 shows Mercury and Zinc in the influent above the respective MAHC limits (8.8/1.0 and 2500/1451.7 µg/l). These concentrations also indicate a possible slug load. To alert the City and confirm the absence of the possibility of a new slug load entering the POTW, the Department contacted the City immediately by email. The City responded with the attached letter.

The Department appreciates the City's continued efforts in annual reporting.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink that reads "Rufus Torrence". The signature is fluid and cursive, with the first name "Rufus" and last name "Torrence" clearly distinguishable.

Rufus Torrence, Pretreatment Engineer
Water Division

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

(2) This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

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

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration
For BOD, TSS & NH₃-N, in each quarter show the maximum daily loading and the maximum daily effluent concentration.

WQ - “Water Quality Levels not to exceed” OR actual permit limit (May-Oct CBOD₅ limit of 25 mg/l shown for BOD).

ATTACHMENT A
 PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	SIC/NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (N/A, C, NC, or SNC)				Permit Limits (also denote those violated & number of times)
			Y/N	Last Action				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	

Please footnote N/A reason

ATTACHMENT C

PRETREATMENT PERFORMANCE SUMMARY (PPS)

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

I. General Information

Control Authority Name _____

Address _____

City _____ State/Zip _____

Contact Person _____ Position _____

Contact Telephone _____ NPDES Permit Nos. _____

Reporting Period _____

(Beginning Month and Year)

(Ending Month and Year)

Total Number of Categorical IUs _____

Total Number of Significant Noncategorical IUs _____

Total Number of Non-Significant (yet permitted) IUs _____

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

1) No. of SIUs Submitting BMRs/Total No. Required.	_____ / _____	N/A*
2) No. of SIUs Submitting 90-Day Compliance Reports/No. Required.	_____ / _____	N/A*
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required.	_____ / _____	_____ / _____
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule	_____ / _____	_____ / _____
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs	_____ / _____	_____ / _____
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .		_____ / _____

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

(2) This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

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

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration
For BOD, TSS & NH₃-N, in each quarter show the maximum daily loading and the maximum daily effluent concentration.

WQ - “Water Quality Levels not to exceed” OR actual permit limit (May-Oct CBOD₅ limit of 25 mg/l shown for BOD).

ATTACHMENT A
 PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	SIC/NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (N/A, C, NC, or SNC)				Permit Limits (also denote those violated & number of times)
			Y/N	Last Action				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	

Please footnote N/A reason

ATTACHMENT C

PRETREATMENT PERFORMANCE SUMMARY (PPS)

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

I. General Information

Control Authority Name _____

Address _____

City _____ State/Zip _____

Contact Person _____ Position _____

Contact Telephone _____ NPDES Permit Nos. _____

Reporting Period _____
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs _____

Total Number of Significant Noncategorical IUs _____

Total Number of Non-Significant (yet permitted) IUs _____

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

III. Compliance Monitoring Program

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued/Total No. Required.	/	/
2) No. of Nonsampling Inspections Conducted. .	/	/
3) No. of Sampling Visits Conducted.	/	/
4) No. of Facilities Inspected (nonsampling) .	/	/
5) No. of Facilities Sampled	/	/

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Compliance Schedules Issued/No. of Schedules Required	/	/
2) No. of Notices of Violations Issued to SIUs	_____	_____
3) No. of Administrative Orders Issued to SIUs	_____	_____
4) No. of Civil Suits Filed.	_____	_____
5) No. of Criminal Suits Filed	_____	_____
6) No. of Significant Violators (attach newspaper publication).	_____	_____
7) Amount of Penalties (not surcharges) Collected (total dollars/IUs assessed) . . .	/	/
8) Other Actions (sewer bans, etc.).	_____	_____

The following certification must be signed in order 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 Date _____

Ft Sm Massard Maximum Allowable Headworks Loading

Pollutant	% Rem ⁷	Water Quality mg/l	Water Quality ¹ lbs/day	Sludge mg/kg	Sludge ³ lbs/day	Inhibition ² mg/l	Inhibition ⁴ lbs/day	MAHL lbs/day	MAHC mg/l	Domestic lbs/day	Allocation for %SF ⁵ lbs/day	MAIL ⁶ lbs/day	Max Inf Exceedec MAHC	Max Effluent vs WQS(mg/l)
Cadmium Total	67	0.0603	12.6738	85	1.548	1.00	69.31	1.5478	0.02233	0.20	1.16	0.965	No	No
Copper Total	93	0.2059	203.8267	4300	56.409	1.00	69.31	56.4086	0.81391	1.30	42.31	41.002	No	No
Lead Total	66	0.2471	50.3670	840	15.527	1.00	69.31	15.5273	0.22404	2.61	11.65	9.037	No	No
Mercury Total	84	0.00017	0.0715	57	0.828	0.10	6.93	0.0715	0.00103	0.0130	0.0536	0.041	No	No
Nickel Total	42	6.3372	757.2455	420	12.200	1.00	69.31	12.2000	0.17603	0.65	9.15	8.498	No	No
Selenium Total	50	0.0657	9.1074	100	2.440	0.20	13.86	2.440	0.03521	0.13	1.83	1.700	No	No
Silver Total	75	0.0537	14.8860	0	0.000	0.25	17.326	14.8860	0.21479	0.46	11.16	10.708	No	No
Zinc Total	91	1.6508	1271.2487	7500	100.549	4.500	311.87	100.5495	1.45082	3.98	75.41	71.434	No	No
Chromium Total	62	10.8176	1972.9387	3000	59.032	1.00	69.31	59.0323	0.85177	0.46	44.27	43.818	No	No
Cyanide Total	69	0.0715	15.9928	0	0.000	0.23	15.940	15.9402	0.23000	0.33	11.96	11.629	No	No
Arsenic	45	2.2931	288.9554	75	2.033	0.10	6.93	2.0333	0.02934	0.26	1.53	1.264	No	No
Molybdenum	50	0.0000	0.0000	75	1.830	0.20	13.86	1.8300	0.02640	0.52	1.37	0.851	No	No
Beryllium	50	0.072911	10.1062	0	0.000	0.10	6.9305	6.9305	0.10000	0.02	5.20	5.178	No	No
BOD ₅							See Note 9	35618.0	513.9				See Note 11	
TSS							See Note 10	39587.8	571.2					
NH3-N							See Note 12	2085.0	30.1					

Dry tons/day of sludge⁸ **6.10** Safety Factor **0.25**

- 1 Water Quality: lbs/day = mg/l * 8.34 * average flow / (1-%Rem)
- 2 Inhibition from Page 3-44 of EPA 833B87202 Be est @ 0.10 mg/l and Appendix G of EPA 833R04002B; Zinc (4.5 mg/l) and CN (0.23 mg/l) from Sept 06 Annual Report
- 3 Sludge: lbs/day = (dry tons/day * 0.002 * critria(mg/kg)) / % Rem
- 4 Inhibition: lbs/day = mg/l * Flow * 8.34
- 5 Allocation: lbs/day = (1 - SF) * MAHL
- 6 MAIL = Maximum allowable industrial loading = Allocation for % SF - Domestic
- 7 EPA Default Removal Eff from Page 3-56 EPA 833B87202; except Be & Mo est @ 50; Cr, Cu,Pb, Hg & Zn calculated on Removal worksheet in this Workbook (Not Shown--**City should update periodically**).
- 8 Dry tons/day of sludge based on Sept 2004 Audit Report showing 2228 dry tons/year or 2228/365 = 6.1 dt/day
- 9 BOD MAHL (lbs/day) based on the design load (14,650 lbs/day) or "highest normal value" recorded by the City which is 35,618 lbs/day recorded during Feb 2011. See BOD-TSS worksheet for more details.
- 10 Because the BOD-TSS data set contained possible "outliers" for TSS, the Department elected to perform a statistical analysis to predict the TSS peak loading which the City can meet with a 95% confidence level. In other words, the analysis predicts the peak loading (39587.8 lbs/day) with 95% assurance that this loading is the "true" peak loading (note that all outliers were removed from the data set). See the TSS MAHL worksheet for more details. The peak load is the average plus two standard deviations.
- 11 Using the old local limit for BOD (450 mg/l), the total loading from all the SIUs is only 0.08 X 7.2 MGD X 450 mg/l X 8.34 = 2161.7 lbs/day. The SIUs appear to have little impact on both the organic and hydraulic loading. I/I appears to be the main source of both excess organic and hydraulic loadings. See 2010 Annual Report for SIU total flow.
- 12 The City did not submit any Ammonia data and the CDM design memorandum did not show any design criteria. Therefore, the Department used the design criteria in the CDM Report for the P Street WWTP. Hence, 1.25 X 20 mg/l X 10 MGD X 8.34 = 2085 lbs/day.

Ft Sm P St Maximum Allowable Headworks Loading

Pollutant	% Rem ⁷	Water Quality mg/l	Water Quality ¹ lbs/day	Sludge mg/kg	Sludge ³ lbs/day	Inhibition ² mg/l	Inhibition ⁴ lbs/day	MAHL lbs/day	MAHC mg/l	Domestic lbs/day	Allocation for %SF ⁵ lbs/day	MAIL ⁶ lbs/day	Max Inf Exceeded MAHC	Max Effluent vs WQS(mg/l)
Cadmium Total	67	0.0530	15.9109	85	2.370	1.00	99.08	2.3699	0.02392	0.25	1.78	1.526	No	No
Copper Total	92	0.1808	223.9008	4300	87.309	1.00	99.08	87.3087	0.88120	1.68	65.48	63.804	No	No
Lead Total	61	0.2093	53.1599	840	25.723	1.00	99.08	25.7233	0.25962	3.36	19.29	15.936	No	No
Mercury Total	60	0.00014	0.0346	57	1.775	0.10	9.91	0.0346	0.00035	0.0168	0.0260	0.009	No	No
Nickel Total	42	5.3667	916.7705	420	18.680	1.00	99.08	18.6800	0.18854	0.84	14.01	13.171	No	No
Selenium Total	50	0.0577	11.4336	100	3.736	0.20	19.82	3.736	0.03771	0.17	2.80	2.634	No	No
Silver Total	75	0.0472	18.6881	0	0.000	0.25	24.770	18.6881	0.18862	0.59	14.02	13.429	No	No
Zinc Total	91	1.4497	1595.9419	7500	153.956	5.800	574.66	153.9560	1.55387	5.12	115.47	110.349	No	No
Chromium Total	92	9.4995	11765.0497	3000	60.913	1.00	99.08	60.9130	0.61479	0.59	45.68	45.097	No	No
Cyanide Total	45	0.0606	10.9131	0	0.000	0.10	9.908	9.9079	0.10000	0.42	7.43	7.011	No	No
Arsenic	45	2.0137	362.7583	75	3.113	0.10	9.91	3.1133	0.03142	0.34	2.34	1.999	No	No
Molybdenum	50	0.0000	0.0000	75	2.802	0.20	19.82	2.8020	0.02828	0.67	2.10	1.430	No	No
Beryllium	50	0.061745	12.2353	0	0.000	0.10	9.9079	9.9079	0.10000	0.03	7.43	7.406	No	No
BOD ₅							See Note 9	39156.0	395.2					
TSS							See Note 10	43003.0	434.0					
NH3-N							See Note 11	3127.5	31.6					

Dry tons/day of sludge⁸ **9.34** Safety Factor **0.25**

NOTES:

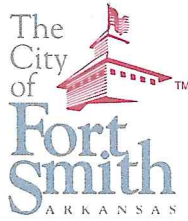
- ¹ Water Quality: lbs/day = mg/l * 8.34 * average flow / (1-%Rem)
- ² Inhibition from Page 3-44 of EPA 833B87202 Be est @ 0.10 mg/l and Appendix G of EPA 833R04002B ; Zinc (5.8 mg/l) from Sept 06 Annual Report
- ³ Sludge: lbs/day = (dry tons/day * 0.002 * critria(mg/kg)) / % Rem
lbs/day = (dry ton-sludge/day) * (2000 lbs-sludge/ton) * (lb-pollutant/10⁶ lbs-sludge) / %Rem = (dry tons/day * 2000/10⁶ * critria(mg/kg)) / % Rem;
- ⁴ Inhibition: lbs/day = mg/l * Flow * 8.34
- ⁵ Allocation: lbs/day = (1 - SF) * MAHL
- ⁶ MAIL = Maximum allowable industrial loading = Allocation for % SF - Domestic
- ⁷ EPA Default Removal Eff from Page 3-56 EPA 833B87202; except Be & Mo est @ 50; Cr and Zn from "Rem" worksheet in this workbook (City Should Update from time to time)
- ⁸ Dry tons/day of sludge based on Sept 2004 Audit report showing 3408 dry tons/year or 3408/365 = 0.34 dt/day
- ⁹ BOD: Referring to the EPA Local Limits Development Guidance (page 5-22), find that the MAHL should be based on the Design Loading Capacity or the Actual Peak Loading whichever is higher. In reference to the P Street Design Criteria (Camp Dresser & McKee, May 2007 Preliminary Engineering Report, Tables 3-9 & 5-10), the design load is 313 mg/l X 15 MGD X 8.34 = 39,156 lbs/day which is greater than the current peak loading of only 13,338 lbs/day.
- ¹⁰ TSS: See CDM report (Section 3.2). The Max Design Load for TSS is 1.25 X 275 mg/l X 15 MGD X 8.34 = 43003 lbs/day.
- ¹¹ NH3-N: Use the Section 3.2 factor (1.25) and the average value (20 mg/l) from Table 5-10, the ammonia MAHL is 1.25 X 20 mg/l X 15 MGD X 8.34 = 3127.5 lbs/day

Massard Treatment Plant - Annual Averages Sept. 2010- Aug. 2011

Effluent								
Month	Avg Flow	BOD	BOD _{lbs/day}	CBOD	CBOD _{lbs/day}	TSS	TSS _{lbs/day}	Max Flow
Sept. 10	7.3	-	-	7	470	13	898	10.8
Oct. 10	5.1	-	-	6	254	6	272	7.0
Nov. 10	5.9	14	780	-	-	8	452	11.2
Dec. 10	5.8	16	994	-	-	18	1233	12.5
Jan. 11	6.2	14	713	-	-	12	580	9.4
Feb. 11	9.4	15	1169	-	-	15	1135	15.4
Mar. 11	6.8	14	788	-	-	11	679	10.6
Apr. 11	10.1	11	825	-	-	23	2184	19.1
May. 11	12.8	-	-	7	851	24	2835	19.5
Jun. 11	5.8	-	-	3	168	5	279	10.2
Jul. 11	4.6	-	-	3	129	6	210	5.2
Aug. 11	5.2	-	-	5	224	8	383	9.4
Sept. 11	4.9	-	-	4	189	10	470	6.6
Oct. 11	5.4	-	-	5	216	8	363	10.5
Nov. 11	8.7	12	967	-	-	10	807	16.3
Dec. 11	9.5	5	446	-	-	7	595	17.8
Jan. 12	8.4	10	826	-	-	11	1127	19.1
Feb. 12	10.2	9	752	-	-	10	904	15.5
Mar. 12	11.9	6	545	-	-	8	885	19.0
Apr. 12	6.8	6	338	-	-	7	384	11.7
May. 12	5.2	-	-	5	206	5	233	8.1
Jun. 12	4.8	-	-	6	222	6	248	7.0
Jul. 12	4.9	-	-	4	182	6	234	7.8
Aug. 12	4.8	-	-	3	116	5	201	6.8
Averages	7.1	11	762	5	269	10	733	11.9

Influent								
Month	Avg Flow	BOD	BOD _{lbs/day}	CBOD	CBOD _{lbs/day}	TSS	TSS _{lbs/day}	Max Flow
Sept. 10	7.3	574	35520	-	-	1138	70831	10.8
Oct. 10	5.1	822	34713	-	-	2574	107753	7.0
Nov. 10	5.9	760	34263	-	-	1311	58334	11.2
Dec. 10	5.8	744	33991	-	-	1262	58354	12.5
Jan. 11	6.2	443	23038	-	-	649	33350	9.4
Feb. 11	9.4	479	35618	-	-	892	65299	15.4
Mar. 11	6.8	445	24524	-	-	798	44428	10.6
Apr. 11	10.1	272	16810	-	-	488	30024	19.1
May. 11	12.8	126	12441	-	-	210	20553	19.5
Jun. 11	5.8	470	21157	-	-	995	43931	10.2
Jul. 11	4.6	590	22219	-	-	951	35690	5.2
Aug. 11	5.2	554	23813	-	-	852	37026	9.4
Sept. 11	4.9	494	20259	-	-	695	28543	6.6
Oct. 11	5.4	443	19218	-	-	560	24292	10.5
Nov. 11	8.7	348	20402	-	-	465	27062	16.3
Dec. 11	9.5	313	22240	-	-	473	33719	17.8
Jan. 12	8.4	297	16442	-	-	427	23235	19.1
Feb. 12	10.2	206	15449	-	-	324	23919	15.5
Mar. 12	11.9	166	11622	-	-	267	18505	19.0
Apr. 12	6.8	347	18521	-	-	643	33946	11.7
May. 12	5.2	495	21434	-	-	818	35767	8.1
Jun. 12	4.8	407	16335	-	-	574	23034	7.0
Jul. 12	4.9	514	21248	-	-	689	28791	7.8
Aug. 12	4.8	491	19676	-	-	621	24691	6.8
Averages	7.1	450	22540	#DIV/0!	#DIV/0!	778	38795	11.9

APJ E2 RT



October 22, 2012

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

Dear Mr. Torrence:

Enclosed you will find the City of Fort Smith's Pretreatment Annual Report for the compliance year of August 1, 2011 through July 31, 2012. 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".

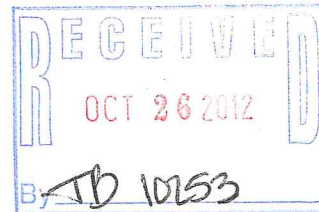
Also enclosed you will find a copy of the "Notice of Significant Violations" which was published on October 6, 2012, summaries of all influent and effluent analyses performed pursuant to conditions 1(c) of the City's NPDES Permits, and a copy of the Environmental Protection Agency's "Pretreatment Performance 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.

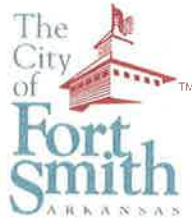
Sincerely,

Lance A. McAvoy
Environmental Manager

- ① Inf-eff chart data logged
- ② ICIS Coded
- ③ Pret City
- ④ Annual Report updated



Handwritten initials: WZ ML



November 5, 2012

Mr. Rufus Torrence,
ADEQ Engineer
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Re: Contaminated Sampling Point Corrected

Dear Mr. Torrence:

This letter is in response to your e-mail inquiry of Thursday, November 1, 2012, regarding the sample collection site at the Massard Wastewater Treatment Plant.

After investigating the current sample protocol and location at the Massard Plant, your assumption that the sample point is still at the location where the sludge line return is located is correct. As of Monday, November 05, 2012, the influent sample location has been moved to an influent point prior to the sludge line return. This new sample site will be more representative of the raw influent coming to the Massard Plant.

During the sampling for priority pollutants, the staff did all it could to collect samples when the sludge return was not in operation, however, it is possible that samples were collected after the sludge return had been turned off, but sludge was still present at the sampling point. As the Massard Plant has not experienced a latent toxic effect with the Whole Effluent Toxicity (WET) analysis over the past year and the Massard Plant has been in compliance, the elevated levels are not the result of "slug" discharges which might cause pass through or interference at the Massard Plant.

After talking with Steve Floyd, Superintendent of Water & Wastewater Operations, it was determined that moving the influent sampling location to a point just the other side of the barscreen should eliminate the sludge carryover that has been experienced in the past.

If you have any additional questions or need any additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Lance A. McAvoy".

Lance A. McAvoy,
Environmental Manager

Cc: Steve Floyd
Jay Lor

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

**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, 2011 through July 31, 2012 are as follows:

- 1. SIU's in Significant Violation of Pollutant Limitations: Hiland Dairy, Inc.; Gerdau MacSteel; St. Edward Mercy Medical Center; Twin River Foods (Navy Road).
- 2. SIU's in Significant Violation of Reporting Requirements: None

**PUBLICATION
ARKANSAS
SEBASTIAN**

I solemnly swear that I am the Inside Sales Manager of the Times Record, a second class mailing privilege, and being not less than four pages of five at a fixed place of business and at fixed daily intervals continuously in the Sebastian County, Arkansas, for more than a period of twelve months, circulated at an established place of business to subscribers and readers generally of all county aforesaid, for a definite price for each copy, or a fixed price per annum, it is considered the value of the publication based upon the news service value fifty percent of the subscribers thereto have paid cash for their subscription agents or through recognized news dealers, over a period of at least six newspaper published an average of more than forty percent news matter. The in the counties of Crawford, Franklin, Johnson, Logan, Polk, Scott and

at the legal notice hereto attached in the matter of:

9 FSAD NOTICE SNC 2012

the regular daily issue of said newspaper for consecutive insertions Saturday the 6th day of October 2012, and concluding on Sunday the 7th day of October 2012 for the following dates:

10/06/12

\$ 319.00

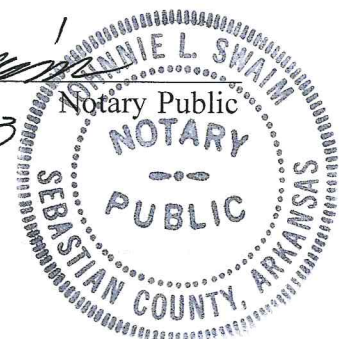
Radonna Taylor

Radonna Taylor

Sworn before me on the 9 day of October, 2012

Johnnie L Swaim

My commission expires: 1-11-2013



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 Lance A. McAvoy Environmental Manager
(Position)

Contact Telephone: (479)784-2337

NPDES Permit Nos. AR0033278, AR0021750

Reporting Period August, 2011 July, 2012
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs 7

Total Number of Significant Noncategorical IUs 9

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>7/7</u>	<u>9/9</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>1/7</u>	<u>3/9</u>
6)	Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>25%</u>	

III. Compliance Monitoring Program


1) No. of Control Documents Issued/Total No. Required	<u>7/7</u>	<u>9/9</u>
2) No. of Nonsampling Inspections Conducted .	<u>7/7</u>	<u>9/9</u>
3) No. of Sampling Visits Conducted . .	<u>133</u>	<u>183</u>
4) No. of Facilities Inspected (nonsampling).	<u>7/7</u>	<u>9/9</u>
5) No. of Facilities Sampled	<u>7/7</u>	<u>9/9</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>50</u>	<u>64</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>1/7</u>	<u>3/9</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 Date

October 22, 2012

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: August 1, 2011 To: July 31, 2012
 TREATMENT PLANT: "P" Street WWTP NPDES PERMIT #: AR0033278
 AVERAGE POTW FLOW: 8.2 % IU Flow: 7%

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		
		08/22/11	12/11/11	02/06/12	06/14/12		08/22/11	12/11/11	02/06/12	06/14/12	EPA MQL (ug/L) (1)	EPA Method Used (1)	Detection Level Achieved (ug/L)
Antimony	N/A	ND	ND	ND	N/A	ND	ND	ND	ND	60	200.8	60	
Cadmium	23.9	ND	ND	ND	53	ND	ND	ND	ND	0.5	200.8	0.5	
Copper	880.9	61.0	37.0	7.2	180.8	5.4	4.3	2.9	3.8	0.5	200.8	0.5	
Lead	259.5	13.0	1.6	1.0	209.3	0.7	0.5	0.6	1.3	0.5	200.8	0.5	
Mercury	0.35	0.0110	0.0059	0.0170	0.14	0.0022	ND	0.0028	ND	0.005	245.2	0.0018	
Nickel	188.4	16.0	3.5	4.4	5366.7	6.4	10.0	5.0	11.0	0.5	200.8	0.5	
Selenium	37.7	ND	ND	ND	57.7	ND	ND	ND	ND	5	200.8	5	
Silver	188.6	2.9	ND	ND	47.2	ND	ND	ND	ND	0.5	200.8	0.5	
Zinc	1553.3	350	52	52	1449.7	57	62	31	56	20	200.8	20	
Chromium	614.5	19	ND	ND	9499.5	ND	ND	ND	ND	10	200.8	10	
Cyanide	100	ND	ND	ND	60.6	ND	ND	ND	ND	10	SM4500-CN C,E	10	
Arsenic	31.41	2.3	ND	ND	2013.7	1.3	0.8	ND	0.5	0.5	200.8	0.5	
Molybdenum	28.2	ND	ND	ND	N/A	ND	ND	ND	ND	-	200.8	8	
Phenols	N/A	35	38	50	N/A	ND	25	42	13	5	420.1	5	
Beryllium	100	ND	ND	ND	61.7	ND	ND	ND	ND	0.5	200.8	0.5	
Thallium	N/A	0.9	ND	ND	N/A	ND	1.1	ND	ND	0.5	200.8	0.5	
Flow, MGD	N/A				N/A								
Big(2-ethylhexyl)phthalate			23.0								625	5.0	
Chloroform			5.3								624	5.0	
Methyl bromide(Bromomethane)								6.3			624	5.0	

(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 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.

MAHL - Maximum Allowable Headworks Level

WQ - Water Quality

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: August 1, 2011 To: July 31, 2012
 TREATMENT PLANT: Massad WWTP NPDES PERMIT #: AR0021750
 AVERAGE POTW FLOW: 7.2 % IU Flow: 8%

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			
		10/31/11	01/11/12	04/25/12	07/25/12		10/31/11	01/11/12	04/25/12	07/25/12	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	223.5	9.6	ND	0.5	0.9	60.3	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5
Copper	814.4	710.0	11.0	14.0	54.0	205.9	7.5	6.0	3.2	7.1	0.5	0.5	0.5	200.8	0.5
Lead	224.1	100.0	3.8	5.5	8.3	247.1	ND	0.6	ND	0.8	0.5	0.5	0.5	200.8	0.5
Mercury	1.03	8.8000	0.0160	0.1600	0.5400	0.117	ND	0.0160	0.0082	0.0094	0.0005	0.0018	0.0005	245.7	0.0018
Nickel	176.1	160.0	5.0	8.8	12.0	637.2	5.2	5.0	6.0	7.3	1.5*	0.5	1.5*	200.8	0.5
Selenium	352.3	37	ND	7	ND	65.7	ND	ND	ND	ND	ND	ND	5	200.8	5
Silver	214.7	35.0	0.7	ND	0.9	53.7	ND	1.0	ND	ND	0.5	0.5	0.5	200.8	0.5
Zinc	1451.7	3500	100	160	320	1650.8	53	44	32	38	20	20	20	200.8	20
Chromium	852.3	510	ND	ND	11	10817.6	ND	ND	ND	ND	10	10	10	200.8	10
Cyanide	230	ND	ND	ND	ND	71.5	ND	ND	ND	ND	10	10	10	SM4500-CN CLE	10
Arsenic	29.3	9.3	0.9	0.9	1.4	2293.1	ND	1.0	ND	ND	0.5	0.5	0.5	200.8	0.5
Molybdenum	26.4	56	9	12	23	N/A	10	ND	10	17	-	-	-	200.8	8
Phenols	N/A	19	43	120	ND	N/A	6	21	15	31	5	5	5	420.1	5
Beryllium	N/A	0.8	ND	ND	ND	72.9	ND	ND	ND	ND	0.5	0.5	0.5	200.8	0.5
Thallium	N/A	ND	ND	ND	0.5	N/A	ND	ND	ND	ND	0.5	0.5	0.5	200.8	0.5
Flow, MGD	N/A					N/A									
Bis(2-ethylhexyl)phthalate			8.1					5.5						625	5.0

(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 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 VI] detected and the quantity in which they were detected.

MAHL - Maximum Allowable Headworks Level

WQ - Water Quality

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				Self Monitoring
									90-day Compliance	Semi Annual	Annual		
City of Arkoma, OK	9131, 9111, 9121		Y	02/01/08		1	16		C	C	C	NC - BOD	
Exide Technologies (GNB Industrial Power)	3691	40 CFR 461	Y	12/15/09		1	31		C	C	C	NC - Oil & Grease, BOD	
Fort Smith Plating Co., Inc.	3471	40 CFR 413.	Y	07/01/12		1	13		C	C	C	C	
Gerdau MacSteel	3312	40 CFR 420.	Y	01/01/10		1	31		C	NC	NC	SNC - Zn, NC - Lead	
Hickory Springs Mfg. Co.	3469, 3429, 3086, 2297	40 CFR 433	Y	09/01/10		1	13		C	C	C	NC - Oil & Grease	
Hiland Dairy Co.	2026, 2086		Y	12/31/08		1	36		C	NC	NC	SNC - BOD, NC - TSS	
Hiram Walker Pernod Ricard USA	2085, 5182		Y	01/01/11		1	14		C	C	C	C	
Mars Petcare	2047		Y	11/01/09		1	16		C	NC	NC	NC - pH	
Owens Corning Composite Materials LLC.	2297, 3296		Y	07/01/11		1	14		C	C	C	C	
OdalServ Corp. - Ft. Smith Division	2541, 2511	40 CFR 433	Y	07/31/08		1	*		C	C	C	C	
Rheem Mfg. Co.	3585	40 CFR 433	Y	07/01/10		1	14		C	C	C	C	
Sparks Regional Medical Center	8062		Y	08/01/11		1	28		C	C	C	NC - Oil & Grease	
St. Edwards Mercy Medical	8062		Y	09/01/11		1	20		C	NC	NC	SNC - BOD, TSS	
Trane	3585	40 CFR 433	Y	11/01/10		1	31		C	C	C	NC - Zn, TSS	
Twin Rivers Foods (Navy Road)	2015		Y	11/01/06		1	25		C	NC	NC	SNC - BOD, pH	
Whirlpool Corp.	3632, 3639		Y	08/31/10		1	15		C	C	C	NC - TSS	

Note(s): * Permittee maintained a zero discharge status in CY 11/12
 Highlighted SIUs had a company name change

PPS Program Report

AR 0033278

*NPDES ID: AR 0021750

Permittee's Name Fort Smith

Date 11-5-2012

* Report Received/Event Date:

Report Type

- Biosolids Program Report
- CAFO Annual Report
- CSO Event Report
- Local Limits Report
- MS4 Program Report
- Pretreatment Performance Summary Report
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

Report Information

* Pretreatment Performance Summary Start Date: 10-26-2012

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

ADD / REMOVE

Significant Industrial Users (SIUs)

SIUs: 15

SIUs Without Control Mechanism: 0

SIUs Not Inspected: 0

SIUs Not Sampled: 0

SIUs in SNC with Pretreatment Standards: 4

SIUs in SNC with Reporting Requirements: 0

SIUs in SNC with Pretreatment Schedule: 0

SIUs in SNC Published in Newspaper: 4

SIUs Schedules: 0

Violation Notices Issued to SIUs: 114

Administrative Orders Issued to SIUs: 0

Civil Suits Filed Against SIUs: 0

Criminal Suits Filed Against SIUs: 0

Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval:

Removal Credits:

ADD / REMOVE

Categorical Industrial Users (CIUs)

CIUs: 7

CIUs in SNC: 1

Acceptance of Waste

Acceptance of Hazardous Waste: No

Acceptance of Non-Hazardous Industrial Waste: No

Acceptance of Hauled Domestic Wastes: No

Penalties

Dollar Amount of Penalties Collected: \$

Industrial Users (IUs) from which Penalties have been collected:

Deficiencies

Deficiencies Identified During IU File Review: No

Control Mechanism Deficiencies: No

Legal Authority Deficiencies: No

Deficiencies in Data Management and Public Participation: No

Deficiencies in Interpretation and Application of Pretreatment Standards: No

Inadequacy of Sampling and Inspections: No

Adequacy of Pretreatment Resources: Yes

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Violation of IU Schedule for Remedial Measures: No

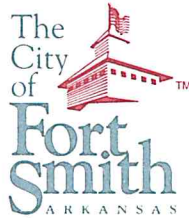
Local Response to Violation of IU Schedule for Remedial Measures:

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling:



BMVAN RT

December 19, 2012

Rufus J. Torrence,
NPDES Pretreatment Engineer
Arkansas Department of Environmental Quality
Water Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317



Re: AR0021750 City of Fort Smith Pretreatment Program Modification for Streamlining Updates

Dear Mr. Torrence:

Please find attached the required and recommended revisions to the City of Fort Smith Pretreatment Program Modification for Streamlining Updates. This document includes the attorney letter and all requested components and changes.

We have received your e-mail of December 19, 2012, and suggested language for the Technically Based Local Limit (TBLL) section of our current ordinance (Section 25-209(c)). At this time we will not be making the suggested changes to the local ordinance.

Once our program is approved, we plan to hire Curt McCormick to conduct the TBLL study. After the study is completed, we will submit it to you for your review, comments, etc.

Once the TBLL study is accepted by ADEQ, we will request a modification of our NPDES permit and update our ordinance.

Finally our narrative will be updated for final approval by ADEQ.

We again thank you for your suggestions, guidance, and patience during the process, and we look forward to our continued partnership in preserving and conserving the environment.

If you need any additional information or have any additional suggestions or comments, please do not hesitate to contact me.

Sincerely,

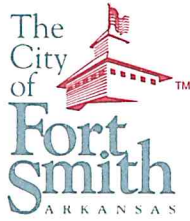
A handwritten signature in black ink that reads "Lance A. McAvoy".

Lance A. McAvoy,
Environmental Manager

Pc: Steve Parke, Director of Utilities
Steve Floyd, Superintendent of Operations for Wastewater and Water Treatment
Jay Lor, Environmental Coordinator

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

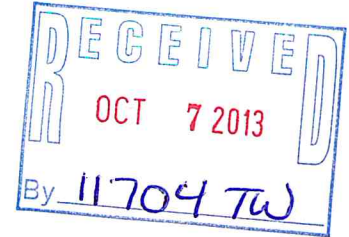
AWOIL
RT



FEDEX: 801272222439

October 4, 2013

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



Dear Mr. Torrence:

Enclosed you will find the City of Fort Smith's Pretreatment Annual Report for the compliance year of August 1, 2012 through July 31, 2013. 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, one SIU no longer discharge to our facilities. Whirlpool Corporation ceased operations and closed their facility.

Also enclosed you will find a copy of the "Notice of Significant Violations" which was published on Sunday, September 29, 2013, 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,

Lance A. McAvoy
Environmental Manager

ADEQ Notes:
2012 Annual Report
AR0021750
AFIN 66-00226
Pret Cities Report updated
IUs Checked
ICIS Coded
Inf-Eff Logged

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

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 Lance A. McAvoy Environmental Manager
 (Position)
 Contact Telephone: (479) 784-2337
 NPDES Permit Nos.: AR0033278, AR0021750
 Reporting Period: August, 2012 July, 2013
 (Beginning month and year) (Ending month and year)
 Total Number of Categorical IUs: 7
 Total Number of Significant Noncategorical IUs: 9

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>7/7</u>	<u>9/9</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>1/7</u>	<u>3/9</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>25%</u>	

III. Compliance Monitoring Program

1) No. of Control Documents Issued/Total No. Required	<u>7/7</u>	<u>9/9</u>
2) No. of Nonsampling Inspections Conducted .	<u>7/7</u>	<u>9/9</u>
3) No. of Sampling Visits Conducted . .	<u>115</u>	<u>148</u>
4) No. of Facilities Inspected (nonsampling).	<u>7/7</u>	<u>9/9</u>
5) No. of Facilities Sampled	<u>7/7</u>	<u>9/9</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>32</u>	<u>46</u>
3) No. of Administrative Orders Issued to SIUs	<u>1</u>	<u>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>1/7</u>	<u>3/9</u>
7) Amount of Penalties Collected (total dollars/IUs assessed)	<u>\$0/0</u>	<u>\$300/1</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 4, 2013
Date

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	14		C	C	NC - BOD, TSS, pH
GNB Industrial Power (Exide Technologies)	3691	40 CFR 461	Y	12/15/09		1	25		C	C	C
Fort Smith Plating Co., Inc.	3471	40 CFR 413	Y	07/01/12		1	12		C	C	C
Gerdau MacSteel	3312	40 CFR 420	Y	01/01/10		1	18		C	NC	SNC - Zn
Hickory Springs Mfg. Co.	3469, 3429, 3086, 2297	40 CFR 433	Y	09/01/10		1	12		C	C	C
Hiland Dairy Co.	2026, 2086		Y	12/31/08		1	26		C	NC	SNC - BOD, NC - TSS
Hiram Walker Pernod Ricard USA	2085, 5182		Y	01/01/11		1	14		C	C	NC - BOD
Mars Petcare	2047		Y	11/01/09		1	13		C	C	C
Owens Corning Composite Materials LLC.	2297, 3296		Y	07/01/11		1	13		C	C	C
Qualiserv 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	13		C	NC	NC - Zn
Sparks Regional Medical Center	8062		Y	08/01/11		1	25		C	C	C
Mercy Hospital Fort Smith	8062		Y	09/01/11		1	16		C	NC	SNC - BOD, TSS
Trane	3585	40 CFR 433	Y	11/01/10		1	35		C	C	NC - Zn
Twin Rivers Foods (Navy Road)	2015		Y	11/01/11		1	15		C	NC	SNC - BOD, pH
Whirlpool Corp.	3632, 3639		Y	08/31/10		1	12		C	C	C

Note(s): * Permittee maintained a zero discharge status in CY 12/13
 Highlighted SIUs had a company name change

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

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: August 1, 2012 To: July 31, 2013
 TREATMENT PLANT: "P" Street WWTP NPDES PERMIT #: AR0033278
 AVERAGE POTW FLOW: 8.2 % IU Flow: 7%

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				
		08/20/12	11/05/12	02/04/13	05/13/13		08/20/12	11/05/12	02/04/13	05/13/13	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	60	200.8	200.8	60
Cadmium	23.9	ND	ND	ND	ND	53	0.67	ND	ND	ND	ND	0.5	200.8	200.8	0.5
Copper	880.9	21	39	18	26	180.8	7.9	4.1	5.0	6.6	4.1	0.5	200.8	200.8	0.5
Lead	259.5	5.3	8.7	3.2	5.3	209.3	0.6	0.96	0.69	0.80	0.96	0.5	200.8	200.8	0.5
Mercury	0.35	0.12	0.075	0.048	0.072	0.14	ND	ND	ND	ND	ND	0.005	245.7	245.7	0.0050
Nickel	188.4	6.6	6.0	3.9	5.0	5366.7	6.5	4.6	6.6	6.0	4.6	0.5	200.8	200.8	0.5
Selenium	37.7	ND	ND	ND	ND	57.7	ND	ND	ND	ND	ND	5	200.8	200.8	5
Silver	188.6	ND	ND	ND	ND	47.2	ND	ND	ND	ND	ND	0.5	200.8	200.8	0.5
Zinc	1553.3	160	360	170	300	1449.7	63	52	86	72	52	20	200.8	200.8	20
Chromium	614.5	ND	ND	ND	ND	9499.5	ND	ND	ND	ND	ND	10	200.8	200.8	10
Cyanide	100	ND	ND	ND	ND	60.6	ND	ND	ND	ND	ND	10	SM4500-CN C,E	SM4500-CN C,E	10
Arsenic	31.41	1.6	1.3	0.85	0.87	2013.7	0.96	0.68	0.62	0.72	0.68	0.5	200.8	200.8	0.5
Molybdenum	28.2	ND	ND	ND	ND	N/A	ND	ND	ND	ND	ND	--	200.8	200.8	8
Phenols	N/A	61	93	82	59	N/A	20	22	45	22	22	5	420.1	420.1	5
Beryllium	100	ND	ND	ND	ND	61.7	ND	ND	ND	ND	ND	0.5	200.8	200.8	0.5
Thallium	N/A	ND	ND	ND	ND	N/A	ND	ND	ND	ND	ND	0.5	200.8	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 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

RECEIVED

OCT 3 2013

Cust:
Ad: 100650738
CITY OF FORT

WATER/WASTEWATER

PROOF OF PUBLICATION
STATE OF ARKANSAS
COUNTY OF SEBASTIAN

I, Radonna Taylor, do solemnly swear that I am the Inside Sales Manager of the Times Record, a daily newspaper having a second class mailing privilege, and being not less than four pages of five columns each, published at a fixed place of business and at fixed daily intervals continuously in the City of Fort Smith, Sebastian County, Arkansas, for more than a period of twelve months, circulated and distributed from an established place of business to subscribers and readers generally of all classes, in the city and county aforesaid, for a definite price for each copy, or a fixed price per annum, which was fixed at what is considered the value of the publication based upon the news service value

contains, that at least fifty percent of the subscribers thereto have paid cash for their subscription of the newspaper or its agents or through recognized news dealers, over a period of at least six months and that said newspaper published an average of more than forty percent news matter. The newspaper is circulated in the counties of Crawford, Franklin, Johnson, Logan, Polk, Scott and Sebastian in Arkansas.

I further certify that the legal notice hereto attached in the matter of:

#5609 FS AD NOTICE SNC2013

published in the regular daily issue of said newspaper for consecutive insertions commencing on Sunday the 29th day of September 2013, and concluding on Friday the 29th day of September 2013 for the following dates:

09/29/13

total cost of: \$ **353.10**

Radonna Taylor

Radonna Taylor

Sworn before me on the 1 day of

October, 2013

Johnnie L Swaim

Notary Public

My commission expires: 1/11/2013

JOHNNIE L SWAIM
Sebastian County
Commission Number 12001380
Notary Public - Arkansas
My Commission Expires January 11, 2013

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)(viii)):

(A) Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(l);

(B) Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(l) 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 Standard or Requirement as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW determines has caused, alone or in combination with other Discharges, Interference or Pass Through (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 this section to halt or prevent such a discharge;

(E) Failure to meet, within 90 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 45 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 noncompliance;

(H) Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW 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, 2012 through July 31, 2013 are as follows:

1. SIU's in Significant Violation of Pollutant Limitations: Hiland Dairy, Inc.; Gerdau MacSteel; Mercy Hospital Fort Smith; Twin River Foods (Navy Road).
2. SIU's in Significant Violation of Reporting Requirements: None