

ADEQ

ARKANSAS
Department of Environmental Quality

November 8, 2011

Paul R. Easley
City of Fort Smith
Utility Department
3900 Kelley Hwy
Fort Smith, Arkansas 72904

Re: City of Fort Smith 2010 Annual Report
(Permit No. AR0021750, AFIN 66-00226)

Dear Mr. Easley:

The Department has reviewed the City's 2010 Annual Report. All the information required in the City's permit [Section 10.c; Page 13 of Part II] was submitted but the department is concerned about the Maximum Allowable Headworks Concentrations (MAHCs) and Water Quality Levels/Limits (WQLs).

The November 14, 2010 influent sample at the Massard WWTP had significant concentration of metals which exceeded the respective MAHC. The copper concentration (900 µg/l), zinc concentration (3100 µg/l) and molybdenum concentration (94 µg/l) exceeded the respective MAHC (copper @ 814.4 µg/l, zinc @ 1451.7 µg/l and molybdenum @ 26.4 µg/l). Furthermore, the April 11, 2010 zinc influent concentration (1200 µg/l) at the Massard WWTP came within 60% of the MAHC. The Department cannot determine if the WWTP experienced Pass-Through (exceeded the WQLs). However, based on the average flow of 7.1 MGD, the City has failed to enforce the MAHLs shown in Ordinance #69-97; §6.D(1).

Zinc => 7.1 MGD	X 3.1 mg/l	X 8.34 lbs/day / MGD-mg/l	= 183.6 lbs/day	> 81.12 lbs/day
Copper => 7.1	X 0.9	X 8.34	= 53.3	> 21.53
Molybdenum => 7.1	X 0.094	X 8.34	= 5.6	> 1.40

The main intent of taking both the influent and effluent concentration is to determine removal efficiencies. Referring to EPA guidance [833-R-04-002A]¹, find on page 5-3 that "*Samples are lagged by the hydraulic residence time of wastewater within the treatment plant*" to determine the "Average Daily Removal Efficiency (ADRE)". Referring to 40 CFR 403.7(b)(2)(iii)(C), "*The Approval Authority may require that each effluent sample be taken approximately one detention time later than the corresponding influent sample when failure to so would result in an unrepresentative portrayal of actual POTW operation*" to determine removal credits.

¹ Cover Page and page 5-3 of "EPA Local Limits Development Guidance" is enclosed.

November 2, 2011

Page 2 of 2

The Department will require the City to find the source of the “slug loads” and control or abate metal loading from the source(s). Please respond back with a corrective action plan within thirty (30) days of receiving this 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 black ink, appearing to read "Rufus Torrence". The signature is fluid and cursive, with the first name "Rufus" and last name "Torrence" clearly distinguishable.

Rufus Torrence,
ADEQ Engineer

Encl: Cover Page and Page 5-3 of EPA Local Limits Development Guidance



Local Limits Development Guidance



5.1.1 REMOVAL EFFICIENCY CALCULATION METHODOLOGIES

This section explains the three removal efficiency calculation methodologies commonly used by POTWs. They are the average daily removal efficiency, the mean removal efficiency, and the decile method.

Average Daily Removal Efficiency

The **average daily removal efficiency (ADRE)** calculation requires that an influent sample be paired with a lagged effluent sample to reflect removal efficiency accurately. Samples are lagged by the hydraulic residence time of wastewater within the treatment plant. As shown in Equation 5.1, a series of daily removal efficiencies based on paired headworks influent (I_n) and POTW effluent data ($E_{potw, n}$) is calculated first. This series of removal efficiencies is then summed (symbolized in the equation by the Greek letter Σ) and divided by the total number of paired observations (N) to yield the removal efficiency (R_{potw}) across the entire wastewater treatment plant (from headworks to plant effluent). To calculate the removal efficiency from headworks to primary treatment effluent (R_{prim}), use paired headworks influent (I_n) and primary treatment effluent data ($E_{prim, n}$). To calculate the removal efficiency from headworks to secondary treatment effluent (R_{sec}), use paired headworks influent (I_n) and secondary treatment effluent data ($E_{sec, n}$).

Mean Removal Efficiency

More flexible than the ADRE method, the **mean removal efficiency (MRE)** can be used with paired data lagged for retention time suitable for the ADRE method and data that have not been lagged or paired. As shown in Equation 5.2, instead of averaging observed paired removal efficiencies, the MRE calculation *first* averages (symbolized in the equation by the overbars) all plant influent values (I_r) and all plant effluent values ($E_{potw, v}$) separately and then calculates removal efficiency across the entire wastewater treatment plant from headworks to plant effluent (R_{potw}). The MRE calculation averages all headworks influent data (I_v) and all primary treatment effluent data ($E_{prim, v}$) to calculate the removal efficiency from headworks to primary treatment effluent (R_{prim}). The MRE calculation averages all headworks influent data (I_v) and all secondary treatment effluent data ($E_{sec, v}$) to calculate the removal efficiency from headworks to secondary treatment effluent (R_{sec}).

Equation 5.1: Removal Efficiency Calculated Using Average Daily Removal Efficiency

$$R_{potw} = \frac{\Sigma(I_n - E_{potw, n})/I_n}{N}$$

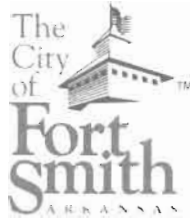
$$R_{prim} = \frac{\Sigma(I_n - E_{prim, n})/I_n}{N}$$

$$R_{sec} = \frac{\Sigma(I_n - E_{sec, n})/I_n}{N}$$

Where:

- R_{potw} = Plant removal efficiency from headworks to plant effluent, as decimal
- R_{prim} = Removal efficiency from headworks to primary treatment effluent, as decimal
- R_{sec} = Removal efficiency from headworks to secondary treatment effluent, as decimal
- I_n = POTW influent pollutant concentration at headworks, mg/L
- $E_{potw, n}$ = POTW effluent pollutant concentration
- $E_{prim, n}$ = Primary treatment effluent pollutant concentration, mg/L
- $E_{sec, n}$ = Secondary treatment effluent pollutant concentration, mg/L
- n = Paired observations, numbered 1 to N

AI ZKC KT



October 28, 2011

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, 2010 through July 31, 2011. 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. Southern Steel & Wire Company ceased operations and closed their facility. William Works, LLC. dba Fort Smith Industrial Laundry services and discharge permit has been terminated and are therefore no longer in operation.

Also enclosed you will find a copy of the "Notice of Significant Violations" which was published on October 28, 2011, 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

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: August 1, 2010

To: July 31, 2011

TREATMENT PLANT: Massard WWTP

NPDES PERMIT #: AR0021750

AVERAGE POTW FLOW: 7.1 MGD

% 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		
		07/19/10	11/14/10	02/13/11	04/25/11		07/19/10	11/14/10	02/13/11	04/25/11	EPA MQL (ug/L) (1)	EPA Method Used	Detection Level Achieved (ug/L)
Antimony	N/A	ND	ND	ND	1.7	N/A	ND	ND	ND	0.54	60	200.8	60
Cadmium	223.5	1.8	8.6	0.73	1.7	60.3	ND	ND	ND	0.14	0.5	200.8	0.5
Copper	814.4	76	900	31	90.8	205.9	4.8	4.0	5.9	8.7	0.5	200.8	0.5
Lead	224.1	13	110	31	16.7	247.1	ND	ND	1.4	1.3	0.5	200.8	0.5
Mercury	1.03	0.048	ND	0.030	0.77	0.17	0.0045	0.0053	0.0033	ND	0.005	245.7	0.0018
Nickel	176.1	17	64	6.8	16.5	6337.2	5.6	5.5	4.9	3.3	1.5*	200.8	0.5
Selenium	352.3	ND	8.7	ND	6.3	65.7	ND	ND	ND	2.7	5	200.8	5
Silver	214.7	13.0	10.0	0.76	2.4	53.7	ND	ND	ND	0.24	0.5	200.8	0.5
Zinc	1451.7	420	3100	120	422	1650.8	41	32	51	40.9	20	200.7/200.8	20
Chromium	852.3	16	110	ND	9.2	10817.6	ND	ND	ND	1.3	10	200.8	10
Cyanide	230	ND	ND	ND	ND	71.5	ND	ND	ND	0.017	10	SM4500-CN C.E	10
Arsenic	29.3	2.3	7.6	ND	2.9	2293.1	0.59	0.61	ND	0.78	0.5	200.8	0.5
Molybdenum	26.4	23.0	94	ND	ND	N/A	16	18	ND	ND	-	200.8	8
Phenols	N/A	30	64	61	ND	N/A	ND	5	ND	ND	5	420.1	5
Beryllium	N/A	ND	0.95	ND	0.19	72.9	ND	ND	ND	ND	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
Flow, MGD	N/A					N/A							
Chloroform		1.9					ND					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

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: August 1, 2010
 TREATMENT PLANT: "P" Street WWTP
 AVERAGE POTW FLOW: 8.9 MGD

To: July 31, 2011
 NPDES PERMIT #: AR0033278
 % 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				
		08/22/10	12/05/10	03/06/11	06/05/11		08/22/10	12/05/10	03/06/11	06/05/11	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	23.9	1.1	ND	ND	ND	53	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5
Copper	880.9	160	48	14	23	180.8	3.4	2.9	8.7	3.9	ND	ND	0.5	200.8	0.5
Lead	259.5	55	1.4	1.4	4.0	209.3	ND	ND	1.0	ND	ND	ND	0.5	200.8	0.5
Mercury	0.35	0.14	ND	0.025	0.000074	0.14	ND	ND	0.004	0.000012	0.005	0.000012	0.005	245.7	0.0018
Nickel	188.4	35	2.9	3.5	3.8	5366.7	7.5	4.2	8.4	9.5	0.5	9.5	0.5	200.8	0.5
Selenium	37.7	ND	ND	ND	ND	57.7	ND	ND	ND	ND	ND	ND	5	200.8	5
Silver	188.6	3.8	ND	ND	ND	47.2	ND	ND	ND	ND	ND	ND	0.5	200.8	0.5
Zinc	1553.3	700	43	52	120	1449.7	92	91	53	61	20	61	20	200.8	20
Chromium	614.5	81	ND	ND	ND	9499.5	ND	ND	ND	ND	ND	ND	10	200.8	10
Cyanide	100	ND	ND	ND	ND	60.6	ND	ND	ND	ND	ND	ND	10	SM4500-CN,C,E	10
Arsenic	31.41	3.0	0.56	ND	0.55	2013.7	0.53	ND	ND	1.1	0.5	1.1	0.5	200.8	0.5
Molybdenum	28.2	14	ND	ND	ND	N/A	ND	ND	ND	ND	ND	ND	--	200.8	8
Phenols	N/A	68	33	31	130	N/A	16	29	15	7.2	5	7.2	5	420.1	5
Beryllium	100	ND	ND	ND	ND	61.7	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									

(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 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	90-day Compliance	Semi Annual Reports	Self Monitoring	
City of Arkoma, OK	9131, 9111, 9121		Y	02/01/08		1	14			C	C	NC - pH, Oil & Grease, TSS
Exide Technologies	3691	40 CFR 461	Y	12/15/09		1	27			C	NC	NC - Oil & Grease, TSS
Fort Smith Industrial	7218		Y	03/01/11		1	8				SNC	SNC - Oil & Grease
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	01/01/10		1	12			C	C	SNC - Zn
Hickory Springs Mfg. Co.	3469, 3429, 3086, 2297	40 CFR 433	Y	09/01/10		1	12			C	C	NC - Oil & Grease, Zn
Hiland Dairy Co.	2026, 2086		Y	12/31/08		1	23			C	NC	SNC - BOD
Hiram Walker Pernod Ricard USA	2085, 5182		Y	01/01/11		1	13			C	C	NC - BOD
Mars Petcare	2047		Y	11/01/09	X	1	14			C	NC	NC - pH, TSS
Owens Corning Composite Materials LLC.	2297, 3296		Y	07/01/11		1	13			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	13			C	NC	NC - Ni, Zn, TSS
Southern Steel & Wire Co.	3496	40 CFR 433	Y	11/01/10		1	9			C	C	SNC - Zn
Sparks Regional Medical Center	8062		Y	08/01/11		1	24			C	C	NC - Oil & Grease
St. Edwards Mercy Medical	8062		Y	09/01/11		1	19			C	C	NC - BOD, TSS
Trane	3585	40 CFR 433	Y	11/01/10		1	28			C	C	NC - Cu
Twin Rivers Foods (Navy Road)	2015		Y	11/01/06		1	13			C	NC	SNC - BOD - pH, TSS
Whirlpool Corp.	3632, 3639		Y	08/31/10		1	12			C	NC	C

Note(s): * Permittee maintained a zero discharge status in CY 10/11
 Highlighted SIUs had a company name change

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, 2010 July, 2011
 (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>114</u>	<u>153</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</u> <u>Categorical</u>	<u>INDUSTRIAL USERS</u> <u>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>32</u>	<u>86</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>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>1/1</u>	<u>1/1</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.

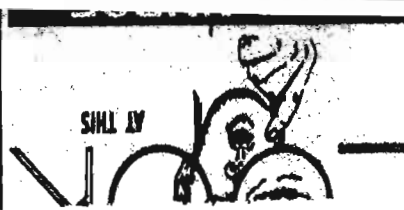


Authorized Representative

October 27, 2011
Date

MOVING SALE, kids cloth-
ing and toys, furniture,
bedroom, tools, house,
ware, average kitchen, &
more! 1118 South Plains,
Friday-Saturday, 7-12
MULTI FAMILY garage
sale, men's, women's,
clothing, items, jeans.

WANTED LICENSED P & A C
Insurance Agent for inde-
pendent agency. Must
have pleasing personality.
Can work under pressure.
MORNINGTON
560
Port Smith, AR 72902



Don't question's relating
to pharmacology issues.
Please send resume to:
Advisory
of first to 918-427-2372
education.com

550
MANAGER
for a purchasing manager. The suc-
cessing LLC/Part is currently accept-

FRIDAY, OCT. 28, 2011

CLASSIFIED

150 AUTO PARTS/TIRES & ACCESSORIES
GOOD USED tires, sizes 15s- 20s, \$10 and up (918)208-2146

190 VEHICLES WANTED

201 LEGALS
IN THE CIRCUIT COURT OF SEBASTIAN COUNTY, ARKANSAS FORT SMITH DISTRICT PROBATE DIVISION
IN THE MATTER OF THE ESTATE OF MATTIE M.

201 LEGALS
These Vehicles are being held at:
Lone Wolf Towing & Transport
2222 Towson Ave
Fort Smith, AR 72901

210 ANNOUNCEMENTS
WALDRON ST Fair 5K October 29th, Call 479-637-3405 or email mlmer.stephanie@waldronfd.org

211 CONVENTION
background is a plus.
Please apply at 427 Main Street, Arkoma, OK

510 CLUBS/RESTAURANTS
TACO MAYO
TACO MAYO IS LOOKING TO FILL POSITIONS OF:

545 GENERAL HELP WANTED
Work of 10-24 hr
STATW

545

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, 90day 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 SIUs that were in significant violation for the period of August 1, 2010 through July 31, 2011 are as follows:

1. SIUs in Significant Violation of Pollutant Limitations: Hilland Dairy; Gardau MacSteel; Southern Steel & Wire Co.; Williams Works, LLC dba Fort Smith Industrial Laundry

2. SIUs in Significant Violation of Reporting Requirements: Williams Works, LLC dba Fort Smith Industrial Laundry

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Corner of Planters Rd & Hwy 71
Fort Smith, AR
479-926-4164

510 CLUBS/RESTAURANTS
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545 GENERAL HELP WANTED
ALLIANCE RUBBER Co.
is accepting applications for
Extrusion & Barbary Machine Operators.
Must be mechanically inclined, have a "Can Do Attitude", be self motivated and able to work under pressure with little supervision. Salary based on experience with excellent benefits.
Please apply at www.alliance-rubber.com
EOE

NATHAN BE
Thank you for
Mail with pay
Times Record
P.O. Box 1

WORDY GURDY® BY TRICKY RICKY KANE

Every answer is a rhyming pair of words (like EAT-CAT and DOUBLE TROUBLE), and they will fit in the letter squares. The number after the definition tells you how many syllables in each word.

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- Lent support to a law by Congress (1)
- Shiner's captain's fringe benefits (1)
- NBA star Dwyane remained (1)
- Drops and scatters unwanted mail (1)
- Norse nation's paradises (2)
- More stupid banjo player (2)
- Requiring the result of good upbringing (2)

ANSWERS
1. BACKED UP & KIRKS PERKS & WADE STAYED & SPILLS BILLS
2. SWEDEN & DUMBER STUMMER & NEEDING BREEDING

NAME _____

BRANCH OF SERV _____

MESSAGE (12 wor) _____

Your Name: _____

Address: _____

City, State, Zip: _____

Ad #1 \$15.00: _____

Cash _____ Check _____

Charge to my Visa _____

Card # _____