

## **Peltier, Hannah**

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**From:** Gilliam, Allen  
**Sent:** Thursday, October 09, 2014 10:08 AM  
**To:** Mcavoy, Lance  
**Cc:** Fuller, Kim; Peltier, Hannah; Molina, Rudy; Kaelin, Cynthia; Ramsey, David; Healey, Richard  
**Subject:** AR0021750\_Fort Smith Oct 2014 Annual Pretreatment report with ADEQ reply\_20141009  
**Attachments:** Fort Smith 2014 Semi Annual Report.PDF

Lance,

Fort Smith's October 2014 annual report was received (10/6/14), reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i). No further action is deemed necessary at this time.

Thank you for your timely report.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports



FedEx# 802472222325

October 3, 2014

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

Dear Mr. Gilliam:

Enclosed you will find the City of Fort Smith's Pretreatment Annual Report for the compliance year of August 1, 2013 through July 31, 2014. 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 September 28, 2014, 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 black ink, appearing to read "Lance A. McAvoy".

Lance A. McAvoy  
Environmental Manager

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, 2013 July, 2014  
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs 7

Total Number of Significant Noncategorical IUs 8

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>8/8</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>2/8</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . . . . .	<u>20%</u>	

III. Compliance Monitoring Program

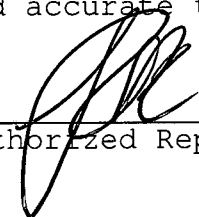
1) No. of Control Documents Issued/Total No. Required . . . . .	<u>7/7</u>	<u>8/8</u>
2) No. of Nonsampling Inspections Conducted .	<u>7/7</u>	<u>8/8</u>
3) No. of Sampling Visits Conducted . . . . .	<u>109</u>	<u>175</u>
4) No. of Facilities Inspected (nonsampling).	<u>7/7</u>	<u>8/8</u>
5) No. of Facilities Sampled . . . . .	<u>7/7</u>	<u>8/8</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>Noncategorical</u>
1) No. of Compliance Schedules Issued/No. of Schedules Required. . . . .	<u>1/1</u>	<u>0/0</u>
2) No. of Violations Issued to SIUs . . . . .	<u>17</u>	<u>70</u>
3) No. of Administrative Orders Issued to SIUs	<u>1/1</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>2/8</u>
7) Amount of Penalties Collected (total dollars/IUs assessed) . . . . .	<u>\$5,000/1</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.

  
Steve Porter  
Authorized Representative

October 3, 2014  
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				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	
City of Arkoma, OK	9131, 9111, 9121		Y	02/01/08		1	17			C	C	NC - TSS
GNB Industrial Power (Exide Technologies)	3691	40 CFR 461	Y	12/15/09		1	20			C	C	C
Fort Smith Plating Co., Inc.	3471	40 CFR 413	Y	07/01/12		1	14			C	C	C
Gerdau MacSteel	3312	40 CFR 420	Y	01/01/10		1	15			C	NC	SNC - Zn
Hickory Springs Mfg. Co.	3469, 3429, 3086, 2297	40 CFR 433	Y	09/01/10		1	13			C	C	C
Hiland Dairy Co.	2026, 2086		Y	12/31/08		1	30			C	NC	SNC - BOD, NC - TSS, pH
Hiram Walker Pernod Ricard USA	2085, 5182		Y	01/01/11		1	14			C	C	NC - pH
Mars Petcare	2047		Y	11/01/09		1	18			C	C	C
Owens Corning Composite Materials LLC.	2297, 3296		Y	07/01/11		1	14			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	14			C	C	C
Sparks Regional Medical Center	8062		Y	08/01/11		1	27			C	C	C
Mercy Hospital Fort Smith	8062		Y	09/01/11		1	21			C	C	NC - TSS, BOD
Trane	3585	40 CFR 433	Y	11/01/10		1	33			C	NC	NC - Zn, Ni, TSS
Twin Rivers Foods (Navy Road)	2015		Y	11/01/11		1	34			NC	NC	SNC - BOD, pH NC - TSS

Note(s): \* Permittee maintained a zero discharge status in CY 13/14  
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, 2013      **To:** July 31, 2014  
**TREATMENT PLANT:** "P" Street WWTP      **NPDES PERMIT #:** AR0033278  
**AVERAGE POTW FLOW:** 7      **% IU Flow:** 10%

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		
		08/19/13	11/05/13	02/10/14	05/12/14		08/19/13	11/05/13	02/10/14	05/12/14	EPA MQL (ug/L) (1)	EPA Method Used (1)	Detection Level Achieved (ug/L)
		Antimony	N/A	<60	<60		<60	<60	N/A	<60	<60	<60	<60
Cadmium	23.9	<0.5	<0.5	<0.5	1.0	53	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Copper	880.9	19	13	13	220	180.8	6.1	7.9	12	4.0	0.5	200.8	0.5
Lead	259.5	1.9	3.0	2.3	62.0	209.3	0.5	0.91	0.91	0.56	0.5	200.8	0.5
Mercury	0.35	0.04	0.06	0.03	0.11	0.14	<0.005	0.0087	<0.005	<0.005	0.005	245.7	0.0050
Nickel	188.4	3.9	3.9	4.2	12.0	5366.7	5.8	5.2	6.9	2.0	0.5	200.8	0.5
Selenium	37.7	<5	<5	<5	<5	57.7	<5	<5	<5	<5	5	200.8	5
Silver	188.6	<0.5	0.69	<0.5	1.1	47.2	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Zinc	1553.3	200	130	190	600	1449.7	81	71	67	47	20	200.8	20
Chromium	614.5	<10	<10	<10	14	9499.5	<10	<10	<10	<10	10	200.8	10
Cyanide	100	<10	<10	<10	<10	60.6	<10	<10	<10	<10	10	SM4500-CN C,E	10
Arsenic	31.41	1.2	2.9	0.9	3.6	2013.7	1.3	0.69	0.54	0.52	0.5	200.8	0.5
Molybdenum	28.2	<8	<8	<8	<8	N/A	<8	<8	<8	<8	--	200.8	8
Phenols	N/A	97	66	12	94	N/A	16	52	<5	11	5	420.1	5
Beryllium	100	<0.5	<0.5	<0.5	<0.5	61.7	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Thallium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Flow, MGD	N/A					N/A							
Bis(2-ethylhexyl)phthalate					12							625	10.0
Chlorobenzene					10							624	10.0
1,4-Dichlorobenzene					16							624	10.0
Toluene					100							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 (1) FOR THE ANNUAL PRETREATMENT REPORT**

REPORTING YEAR: August 1, 2013

To: July 31, 2014

TREATMENT PLANT: Massard WWTP

NPDES PERMIT #: AR0021750

AVERAGE POTW FLOW: 7

% IU Flow: 5%

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		
		10/15/12	11/14/12	01/17/13	04/22/13		10/15/12	11/14/12	01/17/13	04/22/13	EPA MQL (ug/L) (1)	EPA Method Used (1)	Detection Level Achieved (ug/L)
		Antimony	N/A	<60	<60		<60	<60	N/A	<60	<60	<60	<60
Cadmium	223.5	0.6	<0.5	<0.5	<0.5	60.3	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Copper	814.4	16	8	13	18	205.9	5.4	3.9	6	6.1	0.5	200.8	0.5
Lead	224.1	3.7	1.0	7.1	2.8	247.1	<0.5	<0.5	0.79	<0.5	0.5	200.8	0.5
Mercury	1.03	0.01	0.01	0.23	<0.005	0.17	<0.005	<0.005	0.01	<0.005	0.005	245.7	0.0050
Nickel	176.1	4.7	4.0	5.6	6.1	6337.2	4.5	3.8	3.0	4.8	1.5*	200.8	0.5
Selenium	352.3	<5	<5	<5	<5	65.7	<5	<5	<5	<5	5	200.8	5
Silver	214.7	<0.5	<0.5	1.8	<0.5	53.7	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Zinc	1451.7	1900	140	98	160	1650.8	36	37	39	51	20	200.8	20
Chromium	852.3	<10	<10	<10	<10	10817.6	<10	<10	<10	<10	10	200.8	10
Cyanide	230	<10	<10	<10	<10	71.5	<10	<10	<10	<10	10	SM4500-CN C,E	10
Arsenic	29.3	1.2	0.6	2.9	1.0	2293.1	0.9	0.70	0.90	0.84	0.5	200.8	0.5
Molybdenum	26.4	13	<8	<8	14	N/A	<8	<8	<8	9.2	-	200.8	8
Phenols	N/A	69	44	30	50	N/A	24	32	25	15	5	420.1	5
Beryllium	N/A	<0.5	<0.5	<0.5	<0.5	72.9	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Thallium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	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

PROOF OF PUBLICATION  
STATE OF ARKANSAS  
COUNTY OF SEBASTIAN

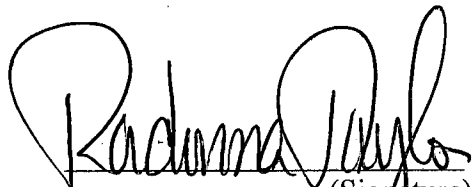
I **Radonna Taylor**, do solemnly swear that I am **Inside Sales Manager** of the **Times Record**, a daily newspaper having a second class mailing privilege, and being not less than four pages of five columns each, published at a fixed place of business and at fixed daily intervals continuously in the 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 it contains, that at least fifty percent of the subscribers thereto have paid cash for their subscription to 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:

RE: PO 5609 CITY PRETREATMENT PROGRAM

ORDER 317253  
COST 371.76

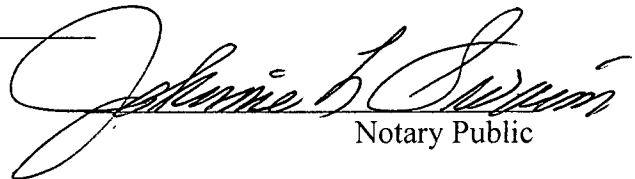
Was published in the regular daily issue of said newspaper for consecutive insertions as Follows:

First Run: 9-28-14  
Second Run:  
Third Run:  
Fourth Run:

  
(Signature)

Sworn before me on the 30 day of Sept 20 14

My Commission expires 1-11-2023

  
Notary Public

JOHNNIE L SWAIM  
Sebastian County  
Commission Number 12391360  
Notary Public - Arkansas  
My Commission Expires January 11, 2023

**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.

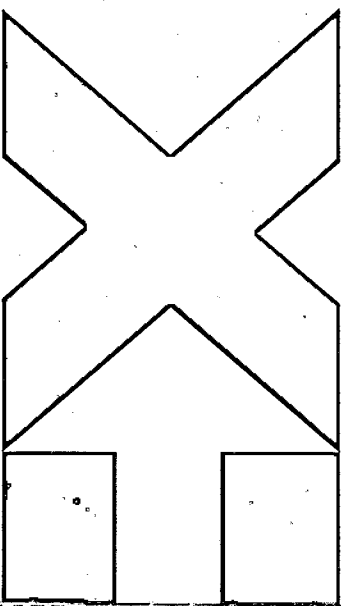
**The SIU's that were in significant violation for the period of August 1, 2013 through July 31, 2014 are as follows:**

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



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FORT SMITH, AR 729045610  
UNITED STATES US

SHIP DATE: 03OCT14  
ACTWT: 0.2 LB  
CAD: /POS1501  
DIMS: 0x0x0 IN  
BILL:SENDER

Part # 156297-4391112/2381/0383 307 01 004849

TO MR ALLEN GILLIAM  
ARKANSAS DEPT OF ENV QUALITY  
5301 NORTSHORE DR

NORTH LITTLE ROCK AR 72118

(501) 682-0623 REF: INU: PO: DEPT:



00038

00052

FedEx Express Package US Airbill

FedEx Tracking Number

8024 7222 2325

Form ID No. 0215

4 Express Package Service

NOTE: Service order has changed. Please

Next Business Day

- FedEx First Overnight
 FedEx Priority Overnight
 FedEx Standard Overnight

5 Packaging

- FedEx Envelope\*

6 Special Handling and Delivery

- SATURDAY Delivery
 No Signature Required

Does this shipment contain dangerous goods?

- No
 Yes
 Dry Ice

7 Payment Bill to:

- Sender
 Recipient
 Third Party
 Credit Card
 Cash/Check

Total Packages Total Weight

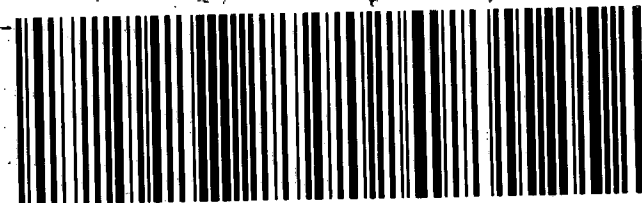
Our liability is limited to US\$100 unless you declare a higher value.

TRK# 8024 7222 2325

X2 LITA

OCT AA
RNIGHT

72118
AR-US LIT



1 From [Redacted] Date 10/3/14

Sender's Name LANCE MCAVOY Phone 479 784-2237

Company CITY OF FT SMITH

Address 3900 KELLEY HWY

City FORT SMITH State AR ZIP 72904-5610

2 Your Internal Billing Reference

3 To Recipient's Name Mr. ALLEN GILLIAM

Company ARKANSAS DEPT OF ENVIRONMENTAL QUALITY

Address 5301 NORTSHORE DRIVE

City NORTH LITTLE ROCK State AR ZIP 72118

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