

Gage, Hannah

From: Yates, Adam
Sent: Wednesday, November 1, 2017 4:33 PM
To: Hancock, John; Mcavoy, Lance
Cc: Gage, Hannah; McWilliams, Carrie; Healey, Richard; Pemberton, Layne
Subject: AR0021750_Fort Smith Oct 2017 Pretreatment Program Annual Report_20171027
Attachments: Fort Smith 2016 Pretreatment Annual Report.pdf

John,

City of Fort Smith's October 2017 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant with the reporting requirements of 40 CFR 403.12(i). If you have any questions or concerns, please feel free to contact me.

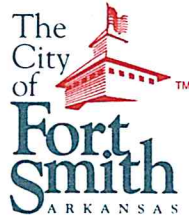
Kindly,

Adam Yates
Engineer, NPDES Permits Section
Office of Water Quality
Arkansas Department of Environmental Quality
Phone: (501) 682-0617
Fax: (501) 682-0880

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FedEx#: 8106-8276-2316

RECEIVED
OCT 27 2017
OCT 30 2017

October 25, 2017

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

Dear Mr. Yates:

Enclosed you will find the City of Fort Smith's Pretreatment Annual Report for the compliance year of August 1, 2016 through July 31, 2017. 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 8, 2017, summaries of all influent and effluent analyses performed pursuant to conditions 1(c) of the City's NPDES Permits, and a copy of the Environmental Protection Agency's "Pretreatment Performance Summary" (PPS). Additionally, no interference, pass through, upset or POTW permit violations could be attributed to SIUs.

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

Sincerely,

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

Don Clover
Environmental Program Manager

Utility Department • 801 Carnall Avenue, Suite 500
Fort Smith, Arkansas 72901
(479) 494-3939

PROOF OF PUBLICATION
STATE OF ARKANSAS
COUNTY OF SEBASTIAN

I **Julie Newman**, do solemnly swear that I am **an advertising representative** 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: 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.

PO# 5625

ORDER# 1030931


COST: \$354.10

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

First Run: 10/8/17

Second Run:

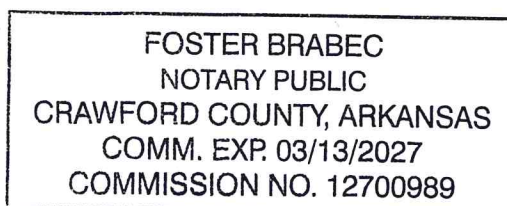
Third Run:


(Signature)

Sworn before me on the 11th day of October 2017

My Commission expires 3/13/2027


Notary Public



**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, 2016 through July 31, 2017 are as follows:

1. SIU's in Significant Violation of Pollutant Limitation: Twin River Foods (Navy Road).
2. SIU's in Significant Violation of Reporting Requirements: Gerdau MacSteel.

PRETREATMENT PERFORMANCE SUMMARY (PPS)

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

I. General Information

Control Authority Name City of Fort Smith

Address 3900 Kelley Hwy

City Fort Smith State/Zip Arkansas, 72904

Contact Person Don Clover Environmental Manager
(Position)

Contact Telephone: (479)784-2337

NPDES Permit Nos. AR0033278, AR0021750

Reporting Period August, 2016 July, 2017
(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>2/2</u>
5)	No. of SIUs in Significant Noncompliance/ Total No. of SIUs	<u>1/7</u>	<u>1/9</u>
6)	Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>13%</u>	

III. Compliance Monitoring Program

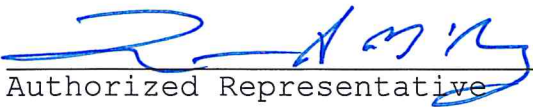
1) No. of Control Documents Issued/Total No. Required	<u>7/7</u>	<u>9/9</u>
2) No. of Nonsampling Inspections Conducted .	<u>7/7</u>	<u>9/9</u>
3) No. of Sampling Visits Conducted	<u>93</u>	<u>206</u>
4) No. of Facilities Inspected (nonsampling).	<u>7/7</u>	<u>9/9</u>
5) No. of Facilities Sampled	<u>7/7</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>2/2</u>
2) No. of Violations Issued to SIUs	<u>6</u>	<u>40</u>
3) No. of Administrative Orders Issued to SIUs	<u>0/0</u>	<u>2/2</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>1/9</u>
7) Amount of Penalties Collected (total dollars/IUs assessed)	<u>\$0/0</u>	<u>\$10,000/2</u>
8) Other Actions (sewer bans, etc.)	<u>0/0</u>	<u>0/0</u>

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

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


Authorized Representative

10/11/2017
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	02/01/13		1	29			C	C	NC - O&G, pH
GNB Industrial Power (Exide Technologies)	3691	40 CFR 461	Y	10/31/16		1	21			C	C	C
Fort Smith Plating Co., Inc.	3471	40 CFR 413	Y	07/01/17		1	16			C	C	C
Gerdau MacSteel	3312	40 CFR 420	Y	10/21/16		1	16			C	C	SNC - Reporting - O&G NC
Hickory Springs Mfg. Co.	3469, 3429, 3086, 2297	40 CFR 433	Y	10/18/16		1	23			NC	NC	NC - O&G
Hiland Dairy Co.	2026, 2086		Y	01/09/17		1	24			C	C	NC - BOD, pH, O&G
Hiram Walker Pernod Ricard USA	2085, 5182		Y	09/21/16		1	17			C	C	C
Kraft-Heinz	2068		Y	09/27/16		1	18			C	C	NC - pH
Mars Petcare	2047		Y	09/21/16		1	19			C	NC	C
Owens Corning Composite Materials LLC.	2297, 3296		Y	09/22/16		1	18			C	C	C
QualServ Corp. - Ft. Smith Division	2541, 2511	40 CFR 433	Y	10/21/16		1	*			NC	C	C
Rheem Mfg. Co.	3585	40 CFR 433	Y	10/21/16		1	**			C	C	C
Simmons Prepared Foods	2015		Y	01/01/17		1	14			C	C	C
Sparks Regional Medical Center	8062		Y	09/22/16		1	31			C	C	C
Mercy Hospital Fort Smith	8062		Y	09/22/16		1	19			C	C	NC - O&G
Trane	3585	40 CFR 433	Y	10/18/16		1	25			C	C	C
Twin Rivers Foods (Navy Road)	2015		Y	01/09/17		1	36			C	C	SNC - BOD TSS, pH NC

Note(s): * Permittee maintained a zero discharge status in CY 16/17

Highlighted SIUs had a company name change

** Permittee stopped all process wastewater discharge in July 2016 and maintained a zero discharge status in CY 16/17

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: From: August 1, 2016

To: July 31, 2017

TREATMENT PLANT: P Street

NPDES PERMIT #: AR0033278

6.877

% IU Flow: 8%

METALS, CYANIDE and PHENOLS (Total)	MAHC (ug/L) (2)	INFLUENT DATES SAMPLED (ug/L) Once/quarter				WQ level/ limit (ug/L) (2)	EFFLUENT DATES SAMPLED (ug/L) Once/quarter				LABORATORY ANALYSIS		
		10/25/16	01/24/17	04/25/17	07/18/17		10/25/16	01/24/17	04/25/17	07/18/17	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
Cadmium	107.3	ND	9.5	0.82	0.54	71.6	ND	ND	ND	ND	0.5	200.8	0.5
Copper	1000	45	940	41	57	244.1	7.1	3.8	2.4	3	0.5	200.8	0.5
Lead	1000	15.0	290.0	10.0	14.0	304.8	0.7	1.00	0.7	0.58	0.5	200.8	0.5
Mercury	2.91	0.13	ND	ND	ND	0.2	ND	ND	ND	ND	0.005	245.7	0.0050
Nickel	738.8	6.2	160.0	5.3	7.5	7817.9	7.2	7.3	4.4	4.4	0.5	200.8	0.5
Selenium	93.9	ND	ND	ND	ND	77.9	ND	ND	ND	ND	5	200.8	5
Silver	250	0.53	11	0.78	0.63	63.7	ND	ND	ND	ND	0.5	200.8	0.5
Zinc	300	200	6300	200	310	1957.7	110	110	51	56	20	200.8	20
Chromium	1000	12	250	ND	12	12828.6	ND	ND	ND	ND	10	200.8	10
Cyanide	100	ND	ND	ND	ND	87.1	ND	ND	ND	ND	10	SM4500-CN C,E	10
Arsenic	100	8.1	29.0	5.0	4.0	2719.4	1.2	0.82	0.91	1.50	0.5	200.8	0.5
Molybdenum	200	9.4	19	ND	ND	N/A	ND	ND	<8	ND	--	200.8	8
Phenols	N/A	40	34	8.6	ND	N/A	ND	ND	0	ND	<5	420.1	5
Beryllium	100	ND	2.1	ND	ND	89.9	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							
Toluene					14							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: **From:** August 1, 2016 **To:** July 31, 2017
TREATMENT PLANT: **Massard** **NPDES PERMIT #:** AR0021750
AVERAGE POTW FLOW: 8.6 **% IU Flow:** 4%

METALS, CYANIDE and PHENOLS (Total)	MAHC (ug/L) (2)	INFLUENT DATES SAMPLED (ug/L) Once/quarter				WQ level/ limit (ug/L) (2)	EFFLUENT DATES SAMPLED (ug/L) Once/quarter				LABORATORY ANALYSIS		
		10/25/16	01/24/17	04/25/17	07/18/17		10/25/16	01/24/17	04/25/17	07/18/17	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
Cadmium	98.3	ND	ND	ND	ND	80.4	ND	ND	ND	0.5	0.5	200.8	0.5
Copper	1000	23.0	17.0	7.9	17.0	464.4	7.9	3.9	4	3	0.5	200.8	0.5
Lead	1000	1.9	1.3	1.1	2.0	304.8	ND	ND	ND	ND	0.5	200.8	0.5
Mercury	3.4	0.03	0.023	0.027	0.040	0.2	0.007	ND	0.01	ND	0.005	245.7	0.0050
Nickel	1000	3.3	4.2	3.7	4.8	7817.9	2.7	3.5	3.3	6.3	1.5*	200.8	0.5
Selenium	96.4	ND	ND	ND	ND	84.9	ND	ND	ND	ND	5	200.8	5
Silver	250	ND	0.88	ND	ND	121.1	ND	ND	ND	ND	0.5	200.8	0.5
Zinc	300	210	140	90	290	3723.8	51	41	25	37	20	200.8	20
Chromium	1000	ND	ND	ND	ND	18127.6	ND	ND	ND	ND	10	200.8	10
Cyanide	100	ND	ND	ND	ND	88.2	ND	ND	ND	ND	10	SM4500-CN C,E	10
Arsenic	100	3.2	2.6	3.0	4.6	5172.6	1.60	1.60	1.40	1.10	0.5	200.8	0.5
Molybdenum	200	ND	ND	ND	8.6	N/A	ND	ND	ND	ND	--	200.8	8
Phenols	N/A	86	50	50	ND	N/A	ND	12	11	ND	5	420.1	5
Beryllium	100	ND	ND	ND	ND	89.9	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							

(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