



FedEx#: 8106-8275-8335

October 1, 2018

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, 2017 through July 31, 2018. The information for this report is submitted via required Attachments; A - titled, "Pretreatment Program Status Report, Updated Industrial Users List" and B - titled, "Significant Violations - Enforcement Actions".

Also enclosed you will find summaries of all influent and effluent analyses performed pursuant to conditions 1(c) of the City's NPDES Permits, and a copy of the Environmental Protection Agency's "Pretreatment Performance Summary" (PPS). Additionally, no interference, pass through, upset or POTW permit violations could be attributed to SIUs.

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

Sincerely,

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

Don Clover
Environmental Program Manager

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

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, 2017 July, 2018
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs 6

Total Number of Significant Noncategorical IUs 11

II. Significant Industrial User Compliance

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

III. Compliance Monitoring Program

| | | |
|---|------------|--------------|
| 1) No. of Control Documents Issued/Total No. Required | <u>6/6</u> | <u>11/11</u> |
| 2) No. of Nonsampling Inspections Conducted | <u>6/6</u> | <u>11/11</u> |
| 3) No. of Sampling Visits Conducted | <u>68</u> | <u>189</u> |
| 4) No. of Facilities Inspected (nonsampling). | <u>6/6</u> | <u>11/11</u> |
| 5) No. of Facilities Sampled | <u>6/6</u> | <u>11/11</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>2/2</u> |
| 2) No. of Violations Issued to SIUs | <u>4</u> | <u>8</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>0/6</u> | <u>0/11</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

10/01/2012
Date

ATTACHMENT A

PRETREATMENT PROGRAM STATUS REPORT

UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

| Industrial User | SIC/NAICS Code(s) | Categorical Determination | Control Document | | New User | Times Inspected | Times Sampled | Compliance Status (C, NC, or SNC) | | | | Permit Limits |
|---|------------------------|---------------------------|------------------|-------------|----------|-----------------|---------------|-----------------------------------|-------------------|-------------|-----------------|------------------------|
| | | | Y/N | Last Action | | | | Reports | | | | |
| | | | | | | | | BMR | 90-day Compliance | Semi Annual | Self Monitoring | |
| City of Arkoma, OK | 9131, 9111, 9121 | | Y | 01/31/18 | | 1 | 19 | | | C | C | NC - O&G, pH, TSS, BOD |
| GNB Industrial Power (Exide Technologies) | 3691 | 40 CFR 461 | Y | 10/31/16 | | 1 | 22 | | | C | C | C |
| Fort Smith Plating Co., Inc. | 3471 | 40 CFR 413 | Y | 07/01/17 | | 1 | 15 | | | C | C | C |
| Gerdau MacSteel | 3312 | 40 CFR 420 | Y | 10/21/16 | | 1 | 14 | | C | C | C | C |
| Glatfelter | 313230 | | Y | 09/12/17 | X | 1 | 11 | C | | C | C | C |
| Hickory Springs Mfg. Co. | 3469, 3429, 3086, 2297 | 40 CFR 433 | Y | 10/18/16 | | 1 | 16 | | | C | NC | NC - pH |
| Hiland Dairy Co. | 2026, 2086 | | Y | 01/09/17 | | 1 | 15 | | | C | C | C |
| Hiram Walker Pernod Ricard USA | 2085, 5182 | | Y | 09/21/16 | | 1 | 16 | | | C | C | C |
| Kraft-Heinz | 2068 | | Y | 09/27/16 | | 1 | 13 | | | C | C | C |
| Mars Petcare | 2047 | | Y | 09/21/16 | | 1 | 16 | | | C | C | C |
| Owens Corning Composite Materials LLC. | 2297, 3296 | | Y | 09/22/16 | | 1 | 15 | | | C | C | C |
| QualServ Corp. - Ft. Smith Division | 2541, 2511 | 40 CFR 433 | Y | 10/21/16 | | 1 | * | | | C | NC | C |
| Simmons Prepared Foods | 2015 | | Y | 01/01/17 | | 1 | 15 | | | C | C | C |
| Sparks Regional Medical Center | 8062 | | Y | 09/22/16 | | 1 | 29 | | | C | C | C |
| Mercy Hospital Fort Smith | 8062 | | Y | 09/22/16 | | 1 | 19 | | | C | C | NC - TSS |
| Trane | 3585 | 40 CFR 433 | Y | 10/18/16 | | 1 | 1 | | | C | C | C |
| Twin Rivers Foods (Navy Road) | 2015 | | Y | 01/09/17 | | 1 | 21 | | | C | C | NC - pH |

Note(s): * Permittee maintained a zero discharge status in CY 17/18

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: From: August 1, 2017

To: July 31, 2018

TREATMENT PLANT: P Street

NPDES PERMIT #: AR0033278

8.701

% IU Flow: 3%

| 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 | | |
|--|-----------------------|--|----------|----------|----------|--|--|----------|----------|----------|-----------------------------|------------------------------|--|
| | | 10/24/17 | 01/23/18 | 04/24/18 | 07/17/18 | | 10/24/17 | 01/23/18 | 04/24/18 | 07/17/18 | EPA MQL (ug/L) (1) | EPA Method Used (1) | Detection Level Achieved (ug/L) |
| | | Antimony | N/A | ND | ND | | ND | ND | N/A | ND | 0.022 | ND | ND |
| Cadmium | 107.3 | ND | ND | ND | ND | 71.6 | ND | ND | ND | ND | 0.5 | 200.8 | 0.5 |
| Copper | 1000 | 25 | 13 | 12 | 8 | 244.1 | 2.7 | ND | 3 | 3 | 0.5 | 200.8 | 0.5 |
| Lead | 1000 | 5.0 | 3.6 | 2.0 | 5.3 | 304.8 | 0.56 | 5.40 | 0.6 | ND | 0.5 | 200.8 | 0.5 |
| Mercury | 2.91 | 0.09 | 0.058 | 0.034 | 0.086 | 0.2 | 0.012 | 53 | 0.0055 | ND | 0.005 | 245.7 | 0.0050 |
| Nickel | 738.8 | 3.4 | 4.6 | 3.3 | 7.1 | 7817.9 | 3.6 | ND | 4.8 | 5.9 | 0.5 | 200.8 | 0.5 |
| Selenium | 93.9 | ND | ND | ND | ND | 77.9 | ND | 4.8 | ND | ND | 5 | 200.8 | 5 |
| Silver | 250 | ND | ND | ND | ND | 63.7 | ND | ND | ND | ND | 0.5 | 200.8 | 0.5 |
| Zinc | 300 | 150 | 140 | 250 | 140 | 1957.7 | 56 | ND | 38 | 54 | 20 | 200.8 | 20 |
| Chromium | 1000 | ND | ND | ND | ND | 12828.6 | ND | ND | ND | ND | 10 | 200.8 | 10 |
| Cyanide | 100 | ND | ND | ND | ND | 87.1 | ND | ND | 50 | ND | 10 | SM4500-CN C,E | 10 |
| Arsenic | 100 | 1.4 | ND | 1.1 | 2.2 | 2719.4 | ND | ND | 0.84 | 1.10 | 0.5 | 200.8 | 0.5 |
| Molybdenum | 200 | ND | ND | ND | ND | N/A | 29 | 1.7 | ND | ND | -- | 200.8 | 8 |
| Phenols | N/A | 10 | 31 | 26 | 87 | N/A | ND | 31 | 8.7 | ND | <5 | 420.1 | 5 |
| Beryllium | 100 | ND | ND | ND | ND | 89.9 | ND | 1.3 | 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 | | | | | ND | | | | | | | 624 | 10.0 |

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

(2) This value was calculated during the development of TBLL based on State WQ Standards and implementation procedures.

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

MAHL - Maximum Allowable Headworks Level

WQ - Water Quality

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: From: August 1, 2017 To: July 31, 2018
TREATMENT PLANT: Massard NPDES PERMIT #: AR0021750
AVERAGE POTW FLOW: 7.558 % IU Flow: 5%

| METALS, CYANIDE and PHENOLS (Total) | MAHC (ug/L) (2) | INFLUENT DATES SAMPLED (ug/L) Once/quarter | | | | WQ level/ limit (ug/L) (2) | EFFLUENT DATES SAMPLED (ug/L) Once/quarter | | | | LABORATORY ANALYSIS | | |
|--|-----------------------|--|----------|----------|----------|--|--|----------|----------|----------|-----------------------------|------------------------------|--|
| | | 10/24/17 | 01/23/18 | 04/24/18 | 07/17/18 | | 10/24/17 | 01/23/18 | 04/24/18 | 07/17/18 | 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 | 0.93 | 80.4 | ND | ND | ND | ND | 0.5 | 200.8 | 0.5 |
| Copper | 1000 | 13.0 | 17.0 | 8.6 | 14.0 | 464.4 | 3.2 | 5.9 | 3.2 | 6.4 | 0.5 | 200.8 | 0.5 |
| Lead | 1000 | 5.2 | 3.1 | 0.9 | 3.8 | 304.8 | ND | ND | ND | ND | 0.5 | 200.8 | 0.5 |
| Mercury | 3.4 | 0.0088 | 0.065 | 0.022 | 1.100 | 0.2 | 0.019 | 0.0077 | 0.061 | 0.007 | 0.005 | 245.7 | 0.0050 |
| Nickel | 1000 | 4.3 | 3.5 | 2.8 | 4.6 | 7817.9 | 3.0 | 2.2 | 2.2 | 3.3 | 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 | ND | ND | ND | 121.1 | ND | 0.61 | ND | ND | 0.5 | 200.8 | 0.5 |
| Zinc | 300 | 120 | 130 | 230 | 300 | 3723.8 | 21 | 25 | 34 | 34 | 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 | 1.3 | 1.3 | ND | 1.8 | 5172.6 | 0.79 | 0.99 | 0.74 | 1.80 | 0.5 | 200.8 | 0.5 |
| Molybdenum | 200 | ND | ND | ND | ND | N/A | ND | ND | ND | ND | -- | 200.8 | 8 |
| Phenols | N/A | 35 | 26 | 23 | 26 | N/A | 15 | 15 | 11 | 5.2 | 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

FedEx Package
Express US Airbill

FedEx
Tracking
Number

8106 8275 8335

Form
ID No. 0200

Recipient's Copy

1 From
Date 10/11/18

Sender's Name PIN CLOVER Phone 479 784-2387

Company CITY OF FORT SMITH

Address 3900 KELLEY HWY Dept./Floor/Suite/Room

City FORT SMITH State AR ZIP 72504-5610

2 Your Internal Billing Reference

3 To Recipient's Name ADAM YATES Phone 501 682-0617

Company ARKANSAS DEPT. ENVIRONMENTAL QUALITY

Address ADEQ Hold Weekday
FedEx location address
REQUIRED. NOT available for
FedEx First Overnight.

Address 5301 NORTSHORE DRIVE Hold Saturday
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.

City NORTH LITTLE ROCK State AR ZIP 72118



8106 8275 8335

4 Express Package Service * To most locations.

Packages up to 150 lbs.
For packages over 150 lbs., use the
FedEx Express Freight US Airbill.

Next Business Day

- FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- FedEx Priority Overnight
Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.

2 or 3 Business Days

- FedEx 2Day A.M.
Second business morning.* Saturday Delivery NOT available.
- FedEx 2Day
Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
- FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

- FedEx Envelope*
- FedEx Pak*
- FedEx Box
- FedEx Tube
- Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

- Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- No Signature Required
Package may be left without obtaining a signature for delivery.
- Direct Signature
Someone at recipient's address may sign for delivery.
- Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

- No
 - Yes
As per attached Shipper's Declaration.
 - Yes
Shipper's Declaration not required.
 - Dry Ice
Dry Ice, 9 UN 1845 _____ x _____ kg
 - Cargo Aircraft Only
- Restrictions apply for dangerous goods — see the current FedEx Service Guide.

7 Payment Bill to:

- Sender
Acct. No. in Section 1 will be billed.
- Recipient
- Third Party
- Credit Card
- Cash/Check

Total Packages Total Weight Credit Card Auth.

*Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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