



October 1, 2019

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, 2018 through July 31, 2019. 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

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, 2018 July, 2019  
(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>1/1</u>	<u>N/A</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>75</u>	<u>220</u>
4) No. of Facilities Inspected (nonsampling). . . . .	<u>6/6</u>	<u>11/11</u>
5) No. of Facilities Sampled . . . . .	<u>5/6</u>	<u>11/11</u>

IV. Enforcement Actions

	<u>SIGNIFICANT CATEGORICAL</u>	<u>INDUSTRIAL USERS 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>10</u>	<u>14</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>\$600/1</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.

*Don Clow*

*9-26-19*

Authorized Representative

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	
Baptist Health- Fort Smith	8062		Y	09/22/16		1	31			C	C	C
City of Arkoma, OK	9131, 9111, 9121		Y	01/31/18		1	18			C	C	NC - O&G, BOD
GNB Industrial Power (Exide Technologies)	3691	40 CFR 461	Y	10/31/16		1	22			C	C	NC - Lead (Daily Max & Monthly Avg)
Fort Smith Plating Co., Inc.	3471	40 CFR 413	Y	07/01/17		1	18			C	C	C
Gerdau MacSteel	3312	40 CFR 420	Y	10/21/16		1	14			C	C	NC - Zinc (Daily Max & Monthly Avg)
Glatfelter	313230		Y	09/12/17		1	30			C	C	NC - TSS
Hickory Springs Mfg. Co.	3469, 3429, 3086, 2297	40 CFR 433	Y	10/18/16		1	15			C	NC	C
Hiland Dairy Co.	2026, 2086		Y	01/09/17		1	17			C	C	C
Hiram Walker Pernod Ricard USA	2085, 5182		Y	09/21/16		1	13			C	C	C
Kraft-Heinz	2068		Y	09/27/16		1	15			C	C	NC - pH
Mars Petcare	2047		Y	09/21/16		1	23			C	C	C
Owens Corning Composite Materials LLC.	2297, 3296		Y	09/22/16		1	17			C	C	C
QualServ Corp. - Ft. Smith Division	2541, 2511	40 CFR 433	Y	10/21/16		1	*			C	NC	N/A
Simmons Prepared Foods	2015		Y	01/01/17		1	21			C	C	NC - BOD
Mercy Hospital Fort Smith	8062		Y	09/22/16		1	22			C	C	NC - BOD, O&G, TSS
Solder Plating	3449, 3469, 3643, 3599, 3479, 3471	40 CFR 433	Y	03/01/19	X	1	6	C	C	C	C	NC- pH
Twin Rivers Foods (Navy Road)	2015		Y	01/09/17		1	13			C	C	NC - pH

Note(s): \* Permittee maintained a zero discharge status in CY 18/19  
Highlighted SIUs had a company name change

**ATTACHMENT B**

**SIGNIFICANT VIOLATIONS - ENFORCEMENT ACTIONS TAKEN**

Industrial User	Nature of Violation		Number of Action(s) Taken					Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other		Date Issued	Date Due		
City of Arkoma, OK		X	2								C	
Gerdau MacSteel		X	2								C	
Glatfelter		X	1								C	
GNB Industrial Power (Exide Technologies)		X	2								C	
Hickory Springs, Mfg. Co.	X		1								C	
Hiland Dairy				X					1/11/2017	1/11/2020	C	Under AO; No.16-001
Kraft-Heinz		X	1								C	
Mercy Hospital Fort Smith	X	X	5								C	
QualServ Corp.	X		4					600			C	
Simmons Prepared Foods		X	3								C	
Solder Plating		X	1								C	
Twin Rivers Foods (Navy Road)		X	2	X					1/11/2017	1/11/2020	C	Under AO; No.16-002

## ATTACHMENT PPS

METALS AND CYANIDE	RECOMMENDED EPA TEST METHOD	
	REQUIRED MQL ( $\mu\text{g/L}$ )	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, 2018

To: July 31, 2019

TREATMENT PLANT: P Street

NPDES PERMIT #: AR0033278

AVERAGE POTW FLOW: 10.6

% 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		
		10/23/18	01/15/19	04/23/19	07/23/19		10/23/18	01/15/19	04/23/19	07/23/19	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	ND	ND	ND	71.6	ND	ND	ND	ND	0.5	200.8	0.5
Copper	1000	16	9.9	24	56	244.1	2.9	2.4	2.9	4.2	0.5	200.8	0.5
Lead	1000	1.5	2.1	3.5	9.4	304.8	ND	0.52	ND	ND	0.5	200.8	0.5
Mercury	2.91	0.02	0.037	0.086	0.091	0.2	0.0052	ND	ND	ND	0.005	245.7	0.0050
Nickel	738.8	4.3	2.2	5.2	10.0	7817.9	6.7	2.9	5.2	5.0	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	0.56	ND	ND	ND	63.7	ND	ND	ND	ND	0.5	200.8	0.5
Zinc	300	260	120	190	300	1957.7	45	39	42	59	20	200.8	20
Chromium	1000	ND	ND	ND	17	12828.6	ND	ND	ND	ND	10	200.8	10
Cyanide	100	ND	ND	ND	ND	87.1	23	ND	ND	ND	10	SM4500-CN C,E	10
Arsenic	100	1.6	1.3	1.5	ND	2719.4	1.0	0.76	0.86	1.10	0.5	200.8	0.5
Molybdenum	200	ND	ND	ND	ND	N/A	ND	ND	ND	ND	--	200.8	8
Phenols	N/A	37	30	52	87	N/A	11	8.6	6	10	<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							
Toluene					ND					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, 2018 To: July 31, 2019  
**TREATMENT PLANT:** Massard NPDES PERMIT #: AR0021750  
**AVERAGE POTW FLOW:** 10.1 % 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		
		10/23/18	01/15/19	04/23/19	07/23/19		10/23/18	01/15/19	04/23/19	07/23/19	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	0.63	80.4	ND	ND	ND	ND	0.5	200.8	0.5
Copper	1000	7.1	7.0	10.0	29.0	464.4	5.2	3.9	4.4	6.4	0.5	200.8	0.5
Lead	1000	1.0	1.0	1.0	5.8	304.8	ND	1	ND	ND	0.5	200.8	0.5
Mercury	3.4	0.0100	0.012	0.066	0.240	0.2	0.0096	ND	0.023	0.007	0.005	245.7	0.0050
Nickel	1000	4.1	2.9	3.3	5.8	7817.9	3.4	2.6	3.1	3.3	0.5	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	ND	ND	ND	0.5	200.8	0.5
Zinc	300	150	84	95	280	3723.8	58	84	25	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	37	ND	11	ND	10	SM4500-CN C,E	10
Arsenic	100	9.8	1.0	1.1	2.4	5172.6	1.10	0.80	0.90	1.80	0.5	200.8	0.5
Molybdenum	200	ND	ND	ND	ND	N/A	ND	ND	5.5	ND	--	200.8	8
Phenols	N/A	24	36	36	76	N/A	11	12	ND	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



Do not ship liquids, blood or diagnostics in this packaging.

**FedEx**  
Express

Package  
US Airbill

FedEx Tracking Number  
8132 8025 6220

Form ID No. 0200

Blindprint Copy

1 From [Redacted]

Date 10-04

Sender's Name PA / LIVER Phone 479 781-5337

Company City of Fort Smith

Address 3900 Kelly Hwy Dept./Floor/Suite/Room

City Fort Smith State AR ZIP 72904-5610

2 Your Internal Billing Reference

3 To Recipient's Name Alan Yates Phone 501 682-0817

Company Arkansas Post Environmental Quality

Address 5301 Northshore Blvd Dept./Floor/Suite/Room

Address Use this line for the HOLD location address or for continuation of your shipping address.

City New London State AR ZIP 72118

4 Express Package Service \*To most locations.

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.

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

FedEx  
TRK# 8132 8025 6220  
0200

WED - 02 OCT AA  
STANDARD OVERNIGHT

72118  
AR-US  
LIT

5 Packaging \*Declared value limit \$500.

FedEx Envelope\*  FedEx P

6 Special Handling and Delivery

Saturday Delivery  
NOT available for FedEx Standard Overnight, FedEx 2D

No Signature Required  
Package may be left without obtaining a signature for delivery.

Does this shipment contain dangerous goods?  
One box must be checked.

No  Yes  
As per attached Shipper's Declaration.  Yes Shipper's not required.

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 lbs. Credit Card Auth. 644

\*Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.  
Rev. Date 3/15 • Part #167001 • ©2012–2015 FedEx • PRINTED IN U.S.A. SRM



FID 356336 01OCT19 FSMA 568C3/2A3C/05A2



8132 8025 6220

Insert waybill here

fedex.com 1800.GoFedEx 1800.463.3339

RT 177  
ST 64

8  
15:00  
A  
6220  
10.02