

Fort Smith 2019 Pretreatment Program Annual Report

Yates, Adam

Mon 3/22/2021 4:15 PM

To: Hancock, John <JHancock@fortsmithar.gov>;

Cc: Healey, Richard <HEALEYR@adeq.state.ar.us>; Ramsey, David <RAMSEY@adeq.state.ar.us>; Allen-Daniel, Leslie <ALLEN-DANIEL@adeq.state.ar.us>; Harbin, Danielle <Danielle.Harbin@adeq.state.ar.us>; McWilliams, Carrie <mcwilliamsc2@adeq.state.ar.us>;

John,

City of Fort Smith's Oct 2020 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 CFR 403.12(i).

Thank you for your timely submittal. If you have any questions or concerns on this matter, please feel free to contact me.

Kindly,

Adam Yates | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
5301 Northshore Drive | North Little Rock, AR 72118
t: (501) 682-0617 | e: yates@adeq.state.ar.us



October 1, 2020

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, 2019 through July 31, 2020. 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, appearing to read "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, 2019 July, 2020
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs 9

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>0/0</u>	<u>N/A</u>
2) No. of SIUs Submitting 90 -Day Compliance Reports/No. Required	<u>0/0</u>	<u>N/A</u>
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required	<u>9/9</u>	<u>10/10</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>0/9</u>	<u>0/10</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>9/9</u>	<u>10/10</u>
2) No. of Nonsampling Inspections Conducted .	<u>9/9</u>	<u>10/10</u>
3) No. of Sampling Visits Conducted	<u>76</u>	<u>163</u>
4) No. of Facilities Inspected (nonsampling).	<u>9/9</u>	<u>10/10</u>
5) No. of Facilities Sampled	<u>5/9</u>	<u>10/10</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>0/0</u>
2) No. of Violations Issued to SIUs	<u>4</u>	<u>21</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>0/9</u>	<u>0/10</u>
7) Amount of Penalties Collected (total dollars/IUs assessed)	<u>\$400/1</u>	<u>\$800/2</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.

Don Adams

9/28/20

Authorized Representative

Date

MONITORING RESULTS (1) FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: From: August 1, 2019

To: July 31, 2020

TREATMENT PLANT: P Street

NPDES PERMIT #: AR0033278

AVERAGE POTW FLOW: 13.1 **% 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		
		10/22/19	01/14/20	04/21/20	07/21/20		10/22/19	01/14/20	04/21/20	07/21/20	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	1.5	ND	0.83	71.6	ND	ND	ND	ND	0.5	200.8	0.5
Copper	1000	12	84.0	24	81	244.1	3.4	4.0	8.9	3.3	0.5	200.8	0.5
Lead	1000	1.8	34.0	3.9	23.0	304.8	ND	0.60	0.8	ND	0.5	200.8	0.5
Mercury	2.91	0.02	0.021	0.026	0.018	0.2	ND	0.0094	0.0055	ND	0.005	245.7	0.0050
Nickel	738.8	2.9	16.0	5.5	9.1	7817.9	3.3	2.0	2.6	2.2	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	ND	0.98	0.62	0.7	63.7	ND	ND	ND	ND	0.5	200.8	0.5
Zinc	300	290	430	130	600	1957.7	50	41	59	90	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	ND	ND	10	SM4500-CN C,E	10
Arsenic	100	11.0	31.0	14.0	64.0	2719.4	4.4	5.50	4	3.70	0.5	200.8	0.5
Molybdenum	200	ND	ND	ND	ND	N/A	ND	ND	ND	ND	--	200.8	8
Phenols	N/A	ND	130	94	10	N/A	ND	ND	ND	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							
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, 2019 To: July 31, 2020
TREATMENT PLANT: Massard NPDES PERMIT #: AR0021750
AVERAGE POTW FLOW: 9.2 % 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		
		10/22/19	01/14/20	04/21/20	07/21/20		10/22/19	01/14/20	04/21/20	07/21/20	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	ND	0.5	200.8	0.5
Copper	1000	55.0	8.3	10.0	21.0	464.4	4.7	3.4	3.6	5.9	0.5	200.8	0.5
Lead	1000	14.0	1.6	1.3	1.9	304.8	ND	ND	ND	0.9	0.5	200.8	0.5
Mercury	3.4	0.0490	0.026	0.009	0.011	0.2	ND	0.0059	ND	ND	0.005	245.7	0.0050
Nickel	1000	8.8	2.4	2.9	3.5	7817.9	3.2	1.9	2.4	2.9	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	980	85	160	180	3723.8	42	29	46	45	20	200.8	20
Chromium	1000	11	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	37.0	6.7	6.3	13.0	5172.6	7.60	7.20	2.90	6.90	0.5	200.8	0.5
Molybdenum	200	ND	ND	ND	ND	N/A	ND	ND	ND	ND	--	200.8	8
Phenols	N/A	ND	82	88	ND	N/A	ND	ND	ND	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

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

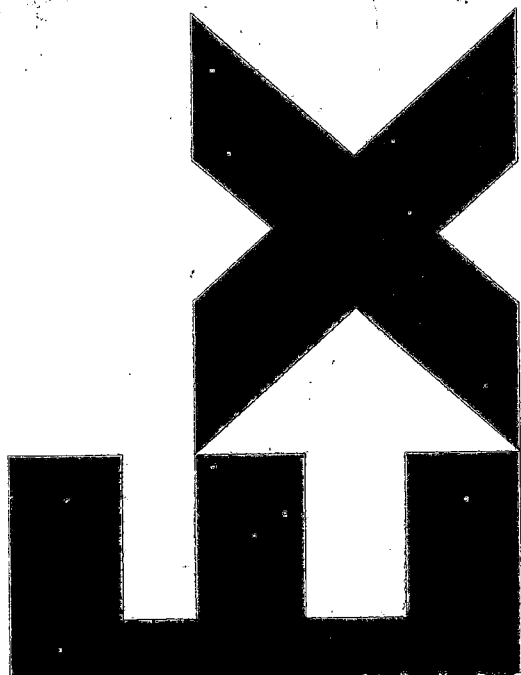
ATTACHMENT A

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	
ABB Die Casting	331523	40 CFR 464	Y	8/22/2019	Y	1	*			C	C	N/A
Baptist Health- Fort Smith	8062		Y	09/22/16		1	20			C	C	NC-O&G
City of Arkoma, OK	9131, 9111, 9121		Y	01/31/18		1	20			C	C	NC - O&G, BOD, TSS
GNB Industrial Power (Exide Technologies)	3691	40 CFR 461	Y	10/31/16		1	22			C	C	C
Fedarm	332992, 332994	40 CFR 433	Y	08/20/19	Y	1	*			C	C	N/A
Fort Smith Plating Co., Inc.	3471	40 CFR 413	Y	07/01/17		1	15			C	C	NC-Zinc (DailyMax)
Gerdau MacSteel	3312	40 CFR 420	Y	10/21/16		1	10			C	C	NC - Zinc (Monthly Avg)
Glatfelter	313230		Y	09/12/17		1	19			C	C	C
Hickory Springs Mfg. Co.	3469, 3429, 3086, 2297	40 CFR 433	Y	10/18/16		1	13			C	C	NC-O&G
Hiland Dairy Co.	2026, 2086		Y	01/09/17		1	12			C	C	NC-O&G
Hiram Walker Pernod Ricard USA	2085, 5182		Y	09/21/16		1	12			C	C	C
Kraft-Heinz	2068		Y	09/27/16		1	15			C	C	NC - BOD, O&G
Mars Petcare	2047		Y	09/21/16		1	14			C	C	C
Owens Corning Composite Materials LLC.	2297, 3296		Y	09/22/16		1	16			C	C	C
QualServ Corp. - Ft. Smith Division	2541, 2511	40 CFR 433	Y	10/21/16		1	*			C	NC	N/A
Silgan Plastics	3089	40 CFR 463	Y	08/20/19	Y	1	*			C	C	N/A
Simmons Prepared Foods	2015		Y	01/01/17		1	13			C	C	NC - TSS
Mercy Hospital Fort Smith	8062		Y	09/22/16		1	22			C	NC	NC - BOD, TSS
Solder Plating	3449, 3469, 3643, 3599, 3479, 3471	40 CFR 433	Y	03/01/19		1	16			C	C	C

Note(s): * Permittee maintained a zero discharge status in CY 19/20
 Highlighted SIUs had a company name change



Express

fedex.com 1800.GoFedEx 1800.463.3339

FedEx Express Package US Airbill FedEx Tracking Number 8132 8025 6610

1 From
 Date 10/1/20
 Sender's Name Dan Glover Phone 573 281-2352
 Company City of Smith AR
 Address 3900 Kelly Hwy Dept./Floor/Suite/Room
 City Fort Smith State AR ZIP 72904

2 Your Internal Billing Reference

3 To
 Recipient's Name Adam Yates Phone
 Company ADEQ
 Address 5301 Northshore Drive Dept./Floor/Suite/Room
 We cannot deliver to P.O. boxes or P.O. ZIP codes.
 Address North Little Rock State AR ZIP 72118
 Use this line for the HOLD location address or for continuation of your shipping address.



8132 8025 6610

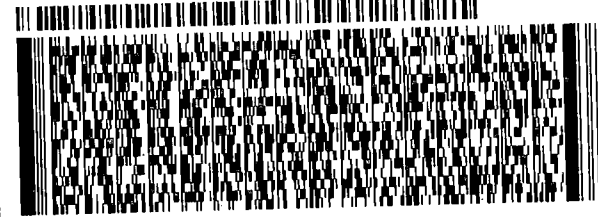
RT 178
FZ 177
1 10:30 A
6610
10.02

Alignment of FedEx Express® shipping label here
 ORIGIN ID:FSMA (479) 784-2337
 LOVER
 JOFFORT SMITH
 KELLEY HWY
 SMITH, AR 72904
 ED STATES US
 SHIP DATE: 01OCT20
 ACTWGT: 0.50 LB
 CAD: 6994118/SSFE2121
 BILL THIRD PARTY

ADAM YATES
ADEQ
5301 NORTHSORE DR

NORTH LITTLE ROCK AR 72118

(000) 000-0000 REF: DEPT:



Form ID No. 020

TRK# 8132 8025 6610

FRI - 02 OCT 10:30A
PRIORITY OVERNIGHT

4 Express Package

Next Business Day

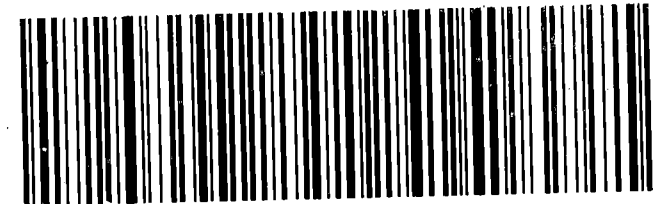
- FedEx First Overnight
Earliest next business morning.
Friday shipments to Monday unless Saturday Delivery is selected.
- FedEx Priority Overnight
Next business morning.* Fri delivered on Monday unless is selected.
- FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.

5 Packaging

- FedEx Envelope*

X2 LITA

72118
AR-US LIT



6 Special Handling and Delivery Signature Options

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

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.
 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