

Gage, Hannah

From: Gilliam, Allen
Sent: Monday, September 26, 2016 11:51 AM
To: hot springs dennis brunson
Cc: Gage, Hannah; Healey, Richard; Yates, Adam; McWilliams, Carrie; Leamons, Bryan
Subject: AR0033880_Hot Springs determination Smiths is not a Metal Finisher_20160926
Attachments: Smith's Consumer Products.pdf

Dennis,

Thank you for following up with this facility's operations in determining they have no core operations under the Metal Finishing regulations.

This office's experience with a company that had scissors, knives and graters listed as its "products" in the Arkansas Manufacturer's Directory had Ni/Cr plating operations in use for their final products; thus the request to determine what Smith's operations were.

Consider "this case closed".

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Dennis Brunson [mailto:DBrunson@cityhs.net]
Sent: Thursday, September 22, 2016 8:07 AM
To: Gilliam, Allen
Cc: Healey, Richard
Subject: RE: Smith's a Metal Finisher???

Allen,

As per our conversation, please find the attachment of Smith Consumer Product's assessment. The site visit was conducted 15 Sept 16 to confirm survey information. If you have any questions and/or concerns, please let me know.

Thanks,

Dennis R. Brunson

Pretreatment Coordinator
Industrial Pretreatment Division
City of Hot Springs Utilities
501-262-1881 ext 15
501-520-9267 (Cell)
501-262-0339 fax
www.cityhs.net

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From: Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]
Sent: Monday, September 12, 2016 9:45 AM
To: Dennis Brunson
Subject: RE: Smith's a Metal Finisher???

Sounds good Dennis,

I really appreciate the work you put into this under your current circumstances. I was just wanting you to cover all the questionable "bases".

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: Dennis Brunson [<mailto:DBrunson@cityhs.net>]
Sent: Monday, September 12, 2016 9:25 AM
To: Gilliam, Allen
Subject: RE: Smith's a Metal Finisher???

Allen,

Richard Karnbach put his signature on the line. I'll confirm all info this week. I always do a follow up on all surveys.

What we have in place is anytime an industry or any businesses locate to our city, they have to go through city planning review, code compliance, fire dept., health dept., public works, stormwater, utilities (including pretreatment) and occupational tax assessment dept. for review. Each department have to sign off whether their regulations are applicable or not in order for the industry and/or business can get any City permits, certificate of occupancy, wastewater and/or water meter. This is in addition to the surveillances that code, public works, stormwater, health dept. and utilities (including pretreatment) do. It's not 100 proof, but its effective.

Sincerely,

Dennis R. Brunson
Pretreatment Coordinator
Industrial Pretreatment Division
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From: Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]
Sent: Monday, September 12, 2016 7:20 AM
To: Dennis Brunson; Healey, Richard
Subject: RE: Smith's a Metal Finisher???

Thanks Dennis,

Now we know for sure, huh?

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: Dennis Brunson [<mailto:DBrunson@cityhs.net>]
Sent: Friday, September 09, 2016 11:29 PM
To: Gilliam, Allen; Healey, Richard
Subject: RE: Smith's a Metal Finisher???

Allen,

I received the IU survey back from them this week. In accordance to the info submitted by Richard Karnbach (Director of Operations), there is no production, fabrication or manufacturing. The industry is only assembling consumer packaging goods, warehousing and distribution. The products and components are assembled there and distributed to specialty retailers. The only waste that is discharged to us is restroom. I will confirm this info with a site visit this coming up week. Once that is completed, I will scan and send you and copy Richard Healey all info pertaining to this industry including the certified cover letter sent by us.

Sincerely,

Dennis R. Brunson

Pretreatment Coordinator
Industrial Pretreatment Division
City of Hot Springs Utilities
501-262-1881 ext 15
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From: Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]
Sent: Friday, September 9, 2016 3:31 PM
To: Dennis Brunson; Healey, Richard
Subject: RE: Smith's a Metal Finisher???

Dennis,

Please submit Smith's comprehensive IU survey within 10 working days from the date on this correspondence. It's your responsibility to determine if this facility is a Federally regulated industry with Pretreatment standards. You've had ample opportunity (since January '16) to make a determination for this potential Metal Finisher.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Richard Healy, Enforcement Branch Manager

From: Gilliam, Allen
Sent: Friday, August 19, 2016 3:37 PM
To: 'Dennis Brunson'
Subject: RE: Smith's???

Thanks Dennis,

Was cleaning out email box and ran across the below. have to see it to the "end", whatever comes of it.

Have a good weekend,

Allen g

From: Dennis Brunson [<mailto:DBrunson@cityhs.net>]
Sent: Friday, August 19, 2016 3:32 PM
To: Gilliam, Allen
Subject: RE: Smith's???

Allen,

We'll get on it this coming up week. I'll have something back from this industry ASAP.

Thanks,

Dennis R. Brunson
Pretreatment Coordinator
Industrial Pretreatment Division

City of Hot Springs Utilities
501-262-1881 ext 15
501-520-9267 (Cell)
501-262-0339 fax
www.cityhs.net

From: Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]
Sent: Friday, August 19, 2016 1:56 PM
To: Dennis Brunson
Subject: RE: Smith's???

Dennis,

Good seeing ya in Frisco. Didn't know if you were going to make it or not.

Hope you made it home safely, but alas, it's time for docs you owe me...

See below regarding Smith's again. please "get on it" and provide me with the results.

Begin permitting process as a Metal Finisher if that turns out to be the case.

I'll be expecting a pdf copy of their "survey" within the next 2 weeks.

Have a great weekend,

Allen g

From: Dennis Brunson [<mailto:DBrunson@cityhs.net>]
Sent: Friday, February 12, 2016 12:16 PM
To: Gilliam, Allen
Subject: Re: Smith's???

Allen, I'm out of state right now. I'll look into that when I get back next week.

Sent from my iPhone

On Feb 12, 2016, at 9:57 AM, Gilliam, Allen <GILLIAM@adeq.state.ar.us> wrote:

Dennis,

What did Smith's survey show? Are they a Metal Finisher?

Allen g

From: Gilliam, Allen
Sent: Thursday, January 28, 2016 2:36 PM
To: 'Dennis Brunson'
Cc: Gage, Hannah; Kaelin, Cynthia; Ramsey, David
Subject: AR0033880_Hot Springs Utilities AR0050148 Jan 2016 annual Pretreatment report_20160128

Dennis,

Hot Springs' January 2016 annual Pretreatment Program report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i).

Note: Your IUs' SIC codes don't match up with what's listed for them in the AR Directory of Manufacturers. Please have your facilities correct them and include their NAICS codes on Hot Springs' next annual report.

Send a comprehensive IU survey to Smith's (747 Mid America Blvd. 71913) as their SIC code is 3421 and the above mentioned directory shows they make "Electrical & manual knives, scissors, tool sharpeners, zesters, graters & kitchen tools.

Metal Finishing processes may very well exist at this facility such as Ni/Cr plating, passivating and/or coating. Please advise as soon as you receive the survey back which should ask specifically what their processes are and what chemicals (not trade names) are used to finish their end products.

Thank you for your timely report.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

U.S. Postal Service
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

HOT SPRINGS NATIONAL, AR 71913

Certified Mail Fee \$3.30
 \$2.70
 Extra Services & Fees (check box, add fee as appropriate)
 Return Receipt (hardcopy) \$0.00
 Return Receipt (electronic) \$0.00
 Certified Mail Restricted Delivery \$0.00
 Adult Signature Required \$0.00
 Adult Signature Restricted Delivery \$0.00



Postage \$1.15
 Total Postage \$1.15

Sent To **Smith Abrasives, Inc.**
 747 Mid-America Blvd
 Hot Springs, AR 71913
 Attn: CEO/Manager

7015 0640 0000 3285 1062

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Smith Abrasives, Inc.
 747 Mid-America Blvd
 Hot Springs, AR 71913
 Attn: CEO/Manager

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 x *Cande Heitman* Agent Addressee

B. Received by (Printed Name)
 Cande Heitman

C. Date of Delivery
 8-26-16

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No



9590 9403 0121 5077 3761 18

? Article Number (Transfer from service label)
 7015 0640 0000 3285 1062

3. Service Type
- Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Return Receipt for Merchandise
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery
 - Priority Mail Express®



City of Hot Springs
Municipal Utilities
WWTP
320 Davidson Drive
Hot Springs, AR 71902
501-262-1881
501-262-0339 fax

August 22, 2016

Smith Abrasives, Inc.
Attn: CEO/Manager
747 Mid-America Blvd
Hot Springs, AR 71913

Re: Industrial Survey

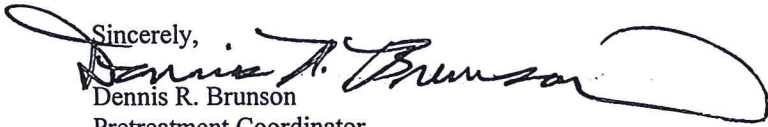
Dear Sir,

The City of Hot Springs Utilities is instituting an industrial survey of your industry as per Arkansas Department of Environmental Quality (ADEQ) inquiry. Non-domestic users that discharge into a Publicly Owned Treatment Works (POTW) are subject to federal, state and local pollutant guidelines in accordance with any applicable provisions of the City of Hot Springs Code Ordinance 4577, Environmental Protection Agency (EPA) Regulation 40 CFR 403 and any applicable provisions of Arkansas Department of Environmental Quality (ADEQ).

Please find enclosed a survey form-1A which is to be completed and returned to this office within five (5) days. This information will be used to determine if your industry's waste stream is regulated under EPA federal guidelines and/or need to be classified as a categorical and/or significant industrial user. Additional information may be requested during this review process. Once the information is reviewed, a scheduled site visit will be conducted.

If you have any questions and/or concerns, please feel free to contact this office.

Sincerely,


Dennis R. Brunson
Pretreatment Coordinator

Enclosure

CC: James Sorrells, Facilities Operations Manager
Monte Lebetter, Utilities Director
Bill Burrough, Deputy City Manager

15 September, 2016

To Whom it may concern,

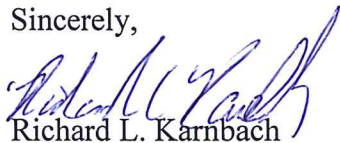
This correspondence is attached to provide additional information relevant to Smith's transformation from a stone mining operation to a strictly Consumer Products warehouse and distribution facility.

For many, many years the Company was known as Smith's Abrasives, an industrial company that mined and processed Arkansas stones for knife and other blade sharpeners and related products. This facility was located at Sleepy Valley.

In 2010 Smith's changed its name to Smith's Consumer Products, quit the mining of Arkansas stone, and relocated to a new facility at 747 Mid-America Blvd., in Hot Springs. We now purchase all our stones from two other local suppliers. 90% of our Consumer Products are purchased overseas as finished goods and the remainder as components we use to assemble various kits. Smith's now is strictly a wholesale warehouse and distribution operation providing Consumer Products to big box and specialty retailers. We no longer are involved in any type of manufacturing.

I hope this helps explain the transition of our company over the last several years. If you have any additional questions please don't hesitate to ask.

Sincerely,



Richard L. Karnbach
Director of Operations
Smith's Consumer Products
(501) 620-9417
rkarnbach@smithsproducts.com

WASTEWATER SURVEY FOR NONRESIDENTIAL ESTABLISHMENTS

FORM 1A

SECTION A – GENERAL INFORMATION

A.1. Company name, mailing address, and telephone number:

Smiths Consumo Products
747 Mid-America Blvd.
Hot Springs, AR
Zip Code: 71913 Telephone Number: 501-701-5936

A.2. Address of production of manufacturing facility: (If same as above, check)

No production or manufacturing. Just assembly and
distribution
Zip Code: _____ Telephone Number: _____

A.3. Name, title, and telephone number of person authorized to represent this firm in official dealings with the Sewer Authority and/or City:

Richard Karpbach, Director of Operations
501-701-5936

A.4. Alternate person to contact concerning information provided herein:

Name: Sandi Skiller Title: Controller Tel. No. 501-701-5926

A.5. Identify the type of business conducted (auto repair, machine shop, electroplating, warehousing, painting, printing, meat packing, food processing, etc.).

consumer packaged goods, warehousing and distribution

Note to Signing Office: In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.14, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR Part 2. Should a discharge permit or required for your facility, the information in this questionnaire will be used to issue the permit.

This is to be signed by an authorized official of your firm after adequate completion of this form and review of the information by the signing official.

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment.

8/26/16
Date

Richard L. Leach
Signature of Official
(Seal if applicable)

A.6. Provide a brief narrative description of the manufacturing, production, or service activities your firm conducts.

We receive finished goods and ~~components~~ components we assemble here and distribute them to big box and specialty retailers.

A.7. Standard Industrial Classification Number(s) (SIC Code) for your facilities:

5091 5099 _____

A.8. This facility generates the following types of wastes (check all that apply):

	Average gallons per day		
1. <input checked="" type="checkbox"/> Domestic Wastes (restroom, employee showers, etc.)	<u>50 gals</u>	Estimated	<input type="checkbox"/> Measured
2. <input type="checkbox"/> Cooling water, non-contact	_____	Estimated	<input type="checkbox"/> Measured
3. <input type="checkbox"/> Boiler/Tower blowdown	_____	Estimated	<input type="checkbox"/> Measured
4. <input type="checkbox"/> Cooling water, contact	_____	Estimated	<input type="checkbox"/> Measured
5. <input type="checkbox"/> Process	_____	Estimated	<input type="checkbox"/> Measured
6. <input type="checkbox"/> Equipment/Facility Washdown	_____	Estimated	<input type="checkbox"/> Measured
7. <input type="checkbox"/> Air Pollution Control Unit	_____	Estimated	<input type="checkbox"/> Measured
8. <input type="checkbox"/> Storm water runoff to sewer	_____	Estimated	<input type="checkbox"/> Measured
9. <input type="checkbox"/> Other (Describe)	_____	Estimated	<input type="checkbox"/> Measured

Total A.8.1 – A.8.9 _____

A.9. Wastes are discharged to (check all that apply).

NA

<input type="checkbox"/> Sanitary sewer	_____	Estimated	<input type="checkbox"/> Measured
<input type="checkbox"/> Storm sewer	_____	Estimated	<input type="checkbox"/> Measured
<input type="checkbox"/> Surface Water	_____	Estimated	<input type="checkbox"/> Measured
<input type="checkbox"/> Ground Water	_____	Estimated	<input type="checkbox"/> Measured
<input type="checkbox"/> Waste Haulers	_____	Estimated	<input type="checkbox"/> Measured
<input type="checkbox"/> Evaporation	_____	Estimated	<input type="checkbox"/> Measured
<input type="checkbox"/> Other (Describe)	_____	Estimated	<input type="checkbox"/> Measured

Provide name and address of waste hauler(s), if used.

A.10. Is a Spill Prevention Control and Countermeasure Plan prepared for the facility?

Yes No

NA

Note: If your facility did not check one or more of the items listed in A.8.4 through A.8.9 above, then you do not need to complete any further sections in this survey/application. If any items A.8.4 through A.8.9 were checked, complete the remainder of this survey/application.

SECTION B – FACILITY OPERATION CHARACTERISTICS

B.1 Number of employee shifts worked per 24-hour day is 12.
Average number of employees per shift is 12.

B.2. Starting times of each shift: 1st 7:00 am/pm 2nd ___ am/pm 3rd ___ am/pm

Note: The following information in this section must be completed for each product line.

B.3 Principal product ^{purchased} produced: CONSUMER PRODUCTS

B.4 Raw materials and process additives used:
NA

B.5 Production process is:
___ Batch ___ Continuous NA Both ___ %Batch ___ %Continuous
Average number of batches per 24-hour day: _____

B.6 Hours of operation: ___ a.m. to ___ p.m. ___ Continuous NA

B.7 Is production subject to seasonal variation? ___ Yes ___ No
If yes, briefly describe seasonal production cycle.
NA

B.8 Are any process changes or expansions planned during the next three years?
___ Yes X No
If yes, attach a separate sheet to this form describing the nature of planned changes or expansions.

SECTION C – WASTEWATER INFORMATION

C.1 If your facility employs processes in any of the 34 industrial categories or business activities listed below and any of these processes generate wastewater or waste sludge, place a check beside the category or business activity (check all that apply).

A. 34 Industrial Categories

NA

1		Adhesives
2		Aluminum Forming
3		Auto & Other Laundries
4		Battery Manufacturing
5		Coal Mining
6		Coil Coating
7		Copper Forming
8		Electric & Electronic Components
9		Electroplating
10		Explosive Manufacturing
11		Foundries
12		Gum & Wood Chemicals
13		Inorganic Chemicals
14		Iron & Steel
15		Leather Tanning & Finishing
16		Mechanical Products
17		Nonferrous Metals
18		Ore Mining
19		Organic Chemicals
20		Paint & Ink
21		Pesticides
22		Petroleum Refining
23		Pharmaceuticals
24		Photographic Supplies
25		Plastic & Synthetic Materials
26		Plastics Processing
27		Porcelain Enamel
28		Printing & Publishing
29		Pump & Paper
30		Rubber
31		Soaps & Detergents
32		Steam Electric
33		Textile Mills
34		Timber

B. Other Business Activity

- Dairy Products
- Slaughter/Meat Packing/Rendering
- Food/Edible Products Processor
- Beverage Bottler

NA

C. Pretreatment devices or processes used for treating wastewater or sludge (check as many as appropriate).

- Air flotation
- Centrifuge
- Chemical precipitation
- Chlorination
- Cyclone
- Filtration
- Flow Equalization
- Grease or oil separation, type _____
- Grease trap
- Grit removal
- Ion Exchange
- Neutralization, ph correction
- Ozonation
- Reverse Osmosis
- Screen
- Sedimentation
- Septic tank
- Solvent separation
- Spill protection
- Sump
- Biological treatment, type _____
- Rainwater diversion or storage _____
- Other chemical treatment, type _____
- Other physical treatment, type _____
- Other, type _____
- No pretreatment provided

NA

C.2 If any wastewater analyses have been performed on the wastewater discharge(s) from your facility, attach a copy of the most recent data to this questionnaire. Be sure to include the date of the analysis, name of laboratory performing the analysis, and location(s) from which sample(s) were taken (attach sketches, plans, etc., as necessary).

NA

SECTION D – OTHER WASTES

D.1 Are any liquid wastes or sludge from this firm disposed of by means other than discharge to the sewer system?

Yes No

If "no," skip remainder of Section D.

If "yes," complete items 2 and 3.

D.2 These wastes may best be described as:

NA

	Estimated Gallons or Pounds/Year
<input type="checkbox"/> Acids and Alkalies	_____
<input type="checkbox"/> Heavy Metal Sludge	_____
<input type="checkbox"/> Inks/Dyes	_____
<input type="checkbox"/> Oil and/or Grease	_____
<input type="checkbox"/> Organic Compounds	_____
<input type="checkbox"/> Paints	_____
<input type="checkbox"/> Pesticides	_____
<input type="checkbox"/> Plating Wastes	_____
<input type="checkbox"/> Pretreatment Sludge	_____
<input type="checkbox"/> Solvents/Thinners	_____
<input type="checkbox"/> Other Hazardous Wastes (specify)	_____
_____	_____
<input type="checkbox"/> Other wastes (specify)	_____
_____	_____
_____	_____

D.3 For the above checked wastes, does your company practice:

NA

- on-site storage
- off-site storage
- on-site disposal
- off-site disposal

Briefly describe the method(s) of storage or disposal checked above.