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# ADEQ

ARKANSAS  
Department of Environmental Quality



June 6, 2006

Don Cochran, Utilities Director  
City of Hot Springs  
P.O. Box 700  
Hot Springs, Arkansas

Re: AFIN No.: 26-00145                      NPDES Permit No.: AR0033880

Dear Mr. Cochran:

On June 1, 2006, I performed a routine pretreatment compliance inspection of the city's pretreatment program in accordance with the provisions of the federal Clean Water ACT, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. This inspection revealed that you were in compliance with the terms of your permit.

If I can be any assistance, please contact me at 501-520-0541.

Sincerely,

Jim McSwain  
District Field Inspector  
Water Division

cc: NPDES Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

# NPDES Compliance Inspection Report

## Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1   N   2   5   3   A   R   0   0   3   3   8   8   0   11   12   0   6   0   6   0   1   17   18   P   19   S   20   1					
Remarks					
A   F   I   N   #   2   6   -   0   0   1   4   5         G   A   R   L   A   N   D       C   O   .					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67       1   69	70   4	71   N	72   N	73       74   75               80	

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date 9:20 A.M. 6/1/06	Permit Effective Date 1 Dec. 2002
<b>City of Hot Springs</b> located approximately 1 mile off of Shady Grove Road at the end of Davidson Drive	Exit Time/Date 2:40 P.M. 6/1/06	Permit Expiration Date 30 Nov. 2007
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
Dennis Brunson, Industrial Pretreatment Coordinator / 501-262-1881 Ron Wacaster, Plant Manager, 501-262-1881, fax 501-262-0339		
Name, Address of Responsible Official/Title/Phone and Fax Number Kent Myers, City Manager, 501-321-6810 320 Davidson Drive Hot Springs, Arkansas 71901	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

## Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	-	Flow Measurement	-	Operations & Maintenance	-	Sampling
-	Records/Reports	-	Self-Monitoring Program	-	Sludge Handling/Disposal	-	Pollution Prevention
-	Facility Site Review	-	Compliance Schedules	S	Pretreatment	-	Multimedia
-	Effluent/Receiving Waters	-	Laboratory	-	Storm Water	-	Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

SEE ATTACHED PCI REPORT

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Jim McSwain	ADEQ / Hot Springs, AR / 501-520-0541	6/2/06
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

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Name of Municipality: City of Hot Springs

AFIN Number: 26-00145

NPDES Permit Number(s): AR0033880

Program Tracked under NPDES Permit Number: AR0033880

Fact Sheet Preparation Date: \_\_\_\_\_

Date of Last PCI/Audit: 3/11/04

Date of Last Annual Report: 12/16/04

Name of Inspector: Jim McSwain

Date PCI Performed: 06/01/06

Name, Title, and Telephone Number of Facility Representative:  
Dennis Brunson, Pretreatment Coordinator, 501-262-1881

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Name and Title of Other Participants: N/A

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Number of IUs Visited: 0

Name(s) of IUs Visited: n/a

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AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

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**NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.**

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. Delete Hubbard Farms, Arkansas Extrusion Purchased Temple Industries.
2. Has ADEQ or EPA been notified of these changes? Yes
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes
4. What procedures are being used to update the IU Survey? Utility Billing, New Industry Information from Code Compliance, and rely on large industries to contact the POTW Prior to utility hook-up.
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 9
6. Number of Categorical Industrial Users: 5
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Federal Regulations
8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Chem-Fab (Central)	Metal Finishing	Anodizing
Chem-Fab (Nevada)	Metal Finishing	Anodizing
Triumph Airborn	Metal Finishing	Anodizing
Arkansas Extrusion	Metal Finishing	Extrusion
Mid American Dist.	Waste Oil Treatment	Used Oil Recovery

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes

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2. Describe any apparent problems with the local limits.  
None

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3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>                    </u>
Effluent:	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>                    </u>
Sludge:	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>                    </u>
Organics:				
Influent:	<u>1/Year</u>	<u>1/Year</u>	<u>1/Year</u>	<u>                    </u>
Effluent:	<u>1/Year</u>	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>                    </u>
Sludge:	<u>1/Year</u>	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>                    </u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?

No

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C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes

2. How many IU permits (or other control documents) have been issued? 11

3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.  
Yes

4. Does the control document contain the following items?  
An expiration date: Yes

Discharge limitations: Yes

If the program requires self-monitoring by the IUs, do the Permits contain: Yes

IU self-monitoring requirements: Yes

IU reporting requirements: Yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes

Type of sample: Yes

Monitoring frequency: Yes

Bypass prohibition: Yes

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

Penalty Provisions: Yes

Slug load notification: Yes

Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>1/Qtr</u>	<u>2/Year</u>
other SIUs	<u>1/Qtr</u>	<u>2/Year</u>
Inspection:		
categorical IUs	<u>1/Year</u>	<u>1/Year</u>
other SIUs	<u>1/Year</u>	<u>1/Year</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes

3. Are inspections announced or unannounced? Both

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following: **Yes**

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: Yes

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Document covers all required elements.

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).

Yes

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes

9. Are sampling and flow monitoring equipment properly maintained? Yes

10. Is the POTW keeping proper field notes and chain of custody forms? Yes

11. Is the sampling location representative of the discharge to the collection system? Yes

12. Are sampling locations identified in POTW records? Yes

13. Are sampling services available in an emergency? Yes

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Permittee uses an audit chart on the computer

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes



17. What are the POTW's procedures for following up violations?  
24 hour notification by phone and written response within  
5 days.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR  
403.12(b)?: Yes

Review a Baseline Monitoring Report from the POTW's file,  
and indicate which of the following items can be identified  
in the BMR:

Name and address: Yes

Other environmental permits held: Yes

Description of operations: Yes

Process flow diagrams: Yes

Flow measurements: Yes

Measurements of regulated pollutants: Yes

Certification of compliance by the IU: Yes

Compliance schedule (if needed): Yes

19. Additional comments on the POTW's inspection and sampling  
procedures: Inspection and sampling procedure meet the  
required elements of the permit.



5. Comments on the POTW's enforcement procedures:

Seems to be adequate

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F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? Yes

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2. Are staffing levels adequate? Yes

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3. Are the responsible officials familiar with the approved program? Yes

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G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:  
N/A

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2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? N/A

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3. Does the POTW have copies of permits for IUs in other cities? N/A

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4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? N/A

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5. Comments on multijurisdictional issues: N/A

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H. EVALUATION AND COMMENTS

Since the previous inspection, the permittee has hired a second  
Employee to work within the pretreatment program. This was a  
Much needed move given the size of the program.

There were no major violations noted during this inspection.

Multiple horizontal lines for additional text or comments.

## PPETS CODE SHEET

## PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Jim McSwain</u>	
NAME OF FACILITY:	<u>City of Hot Springs</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0033880</u>	NPID
DATE OF PCI:	<u>June 1, 2006</u>	DTIA

## PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>9</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>5</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>N/A</u>	SNIN