



City of Hot Springs
Municipal Utilities
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Hot Springs, AR 71902
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September 1, 2015

Arkansas Department of Environmental Quality
Attn: Allen Gilliam
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: City of Hot Springs (NPDES # AR0033880) Pretreatment Program Audit/
Municipal Pollution Prevention (P2) Assessment Response

Dear Mr. Gilliam,

Unfortunately for whatever reason, I did not receive your assessment (via USPS mail) until August 13, 2015 as per our conversation around that time. Please find the corrected actions and actions being taken to deficiencies noted in the required actions of the audit.

Findings: It was not clear when the City had conducted an IU survey.

Response: We are currently updating our data base for smaller commercial businesses. We found the old spread sheet that was developed several years back. It was not updated because the previous assigned auditor did not think it was necessary to assess the smaller commercial businesses and it was discontinued. We are currently developing sector IU forms to better target the smaller commercial businesses. A new spreadsheet will be developed and updated periodically in order to better track the smaller commercial business. Currently no new major SIU have located within our jurisdiction.

Findings: It was discovered that not all industries' files contained a complete comprehensive process narrative or updated/accurate wastewater flow schematics.

Response: This is in the process of being corrected now. Fifty percent of permitted IUs have submitted this information and the others are currently working on theirs.

Findings: The city must obtain accurate flow measurements of dilution streams. If they are considered (de-minimus) and do not make an impact on the two facilities, this must be documented and fully explained.

Triumph Airborne Structures had a bathroom (sanitary wastewater) discharging in the same sewer line that their regulated wastewater is discharging into prior to the sampling point. Triumph Fabrications was rinsing barrels of the chemicals used in their waste treatment process and dumping the rinse water back into their waste treatment process.

Response: The barrel rinsing protocol has ceased at Triumph Fabrications because, it was not necessary to send the empty barrel back to the vender chemical free. The IU rep indicated that it was only done for safety purposes. The restroom at Triumph Airborne Structures is located upstairs in their QA/QC lab. Only lab personnel (one to two) are utilizing it. This issue was addressed and discussed in the last three audits with the previous assigned state pretreatment coordinator. It was agreed that this restroom waste stream was so small that it was deemed de-minimus and did not have an impact on the IU's regulated waste stream. This will be documented in the revised IU inspection form.

Findings: Triumph Airborne Structures toxic organic management plan (TOMP) focused on a list of hazardous waste and not toxic organics that may be present in the facility's processes. Their permit application indicated the toxic organics were suspected absent. Triumph Fabrications-Hot Springs should detail in its TOMP their solvent recovery system. The City must review, independently verify (through a comprehensive inspection) and approve their TOMP in writing.

Response: Triumph Airborne Structures and Triumph Fabrication-Hot Springs have since that time revised their TOMP's and submitted them to the City for approval. The City is currently reviewing the TOMP's and will verify this in the upcoming annual inspection. An approval letter will be sent to each IU.

Findings: Triumph Airborne Structures' permit incorrectly authorizes the facility to transport industrial wastewater and must be corrected to reflect current conditions narratively describing the exact sampling point of the facility's wastewater to the City's collection system.

Response: This was a total clerical pc error which has since been corrected. The final permit that was issue to the IU does not have that error on it.

Findings: Documents could not be produced indicating that the City had conducted discharge potential evaluations although slug control plans for several industries were located. The City's own slug discharge potential evaluations must be in the industries files.

Response: A potential slug control evaluation checklist is currently being developed and will be used during the next IU review.

Findings: The IU inspection forms were vague and did not address many of the questions asked in the EPA checklist form. The form must be revised to include more comprehensive questions and assessment. Example: wastewater generating and treatment process, operation and preventive maintenance protocols, appearance of tanks, plumbing, pumps, valves, appearance of leaks, corrosion, pools of fluids etc,

Response: The IU inspection form is currently being completely revised and will be utilized at the next IU assessments.

Findings: Chain of Custody was not complete, sampler name missing on form. The results of a broken chain of custody may not be admissible in a court of law.

Response: The staff was made aware of this issue and the oversight has been corrected. Prior to releasing any samples, a second review of the chain of custody by a second person has been instituted in order for this oversight to not occur again.

Findings: Revise the City's TBLL to include some sort of narrative describing the development of the Maximum Allowable Headworks Loading and the Maximum Allowable Industrial Loadings. The narrative should also include a conclusion stating whether local limits are needed for certain parameters or TBLLs are currently not necessary for any of the identified pollutants of concern. EPA default data from its

guidance manual were used for developing the TBLLs. The only City specific data used was from 2006 and 2007 influent and effluent data for copper and zinc.

Response: The City submitted (Table II, Table III, 503 sludge and domestic background testing) data to our contract engineering firm and the previous ADEQ assigned state pretreatment coordinator. After several joint (City officials, Engineering Firm, state pretreatment coordinator and water division chief) meetings, the state pretreatment coordinator rejected the TBLLs submitted by our contract engineering firm. He indicated that he was going to develop TBLLs and do the narrative describing the development of the MAHLs and MAILs and whether local limits are necessary. The reasoning behind using EPA default data was because the City domestic background data was non-detect with the exception of copper and zinc. The City will periodically evaluate whether local limits are necessary.

Findings: Auditor's office had no complete copy of the approved pretreatment program.

Response: The City will again submit a second copy of the complete approved program that was previously submitted to the previous assigned state pretreatment coordinator.

Please find responses to the recommended actions of the audit.

Findings: Strong recommendation that the City develop a fact sheet in each permitted industry's file.

Response: This recommendation is logical considering it will help make the retrieval of pertinent information much more efficient.

Findings: Recommend requesting pollution prevent and best management practices in all permit application and non-domestic surveys.

Response: Recommendation will be used in revising the new permit application and IU survey forms.

Findings: Recommend send out the hazardous waste notification to all the generators.

Response: We will send the notifications periodically.

Findings: Recommend revising 24hr composite to timed composite in all IU permits

Response: We will consider changing it to timed composite over a 24hr period.

Findings: Recommend revisiting Alliance Rubber's permit parameters to determine which realistically need to be limited. A review of their sampling showed historically many parameters were non-detect. It is the City's discretion as to which parameter need to be tested.

Response: We will revisit the IU's permit.

Findings: Recommend recording process flows on the days the City is doing the sampling at each industry:

Response: We will consider the recommendation and determine if it's feasible.

Findings: Strong recommendation to include on the City's revised inspection form to include IU's rep's signature and date.

Response: We will consider the recommendation.

Findings: Recommend date stamping all correspondence and initialing.

Response: This recommendation is being followed. There were a few correspondences that were missing the stamped date. We will make sure that all pertinent correspondences are stamped and initialed.

Findings: Recommend reorganizing industry files possibly using three-ring notebooks to separate permitted industry information.

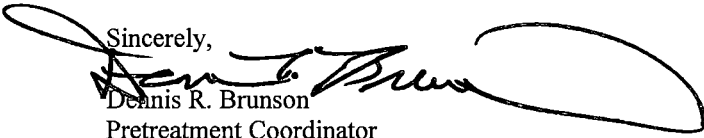
Response: We will consider recommendation.

Findings: Recommend continual sending of fliers to the general public concerning proper disposal of FOG, pharmaceuticals and non-dispersibles.

Response: We will work closely with other departments/agencies in promoting awareness.

If you have any questions, comments and/or need additional information, please let me know.

Sincerely,



Dennis R. Brunson
Pretreatment Coordinator

Enclosure

C: James Sorrells, Facilities Operations Manager
Bill Burrough, Deputy City Manager

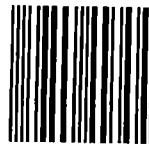
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Waste Water Treatment Plant

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Quality
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**RETURN RECEIPT
REQUESTED**

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