

December 21, 2012

Richard Penn, Utilities Director City of Hot Springs P.O. Box 700 Hot Springs, AR 71901

RE: Pretreatment Compliance Inspection AFIN: 26-00145, NPDES Permit No.: AR0033880

Dear Mr. Penn:

On December 5 & 6, 2012, I performed a pretreatment compliance inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed you to be in compliance with the terms of your permit.

If I can be of any assistance, please contact me at 870 389-6970.

Sincerely,

Shan Synch

Shan Lynch District Field Inspector Water Division

AFIN: 26	6-00145
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٩	EPA							Form Approved OMB No. 2040-0003
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460								
	NPDES							
	NPDES Compliance Inspection Report Section A: National Data System Coding							
	Transaction Code NPDES Yr/Mo/Day Inspector Fac. Type							
1	N 2 5 3 A R	0	0 3 3 8	8 0 11	12 1	2 1 2 0 5 17	18	P 19 S 20 1
Remarks								
	Inspection Work Days]	Facility Evaluation R	ating	BI	QA]	Reserved
	67 69		70 N	71	N 72	N 73 74 75		80
				Section 1	B: Facility	Data		
include POTW name and NPDES permit number) 091					Entry Time/Date 0912 / 12-5-2012 0758 / 12-6-2012		Permit Effective Date February 1, 2008	
	<u>y of Hot Springs</u> roximately 1 mile off of Shady Gr	ove R	Road at the end of Da	avidson Drive		Exit Time/Date 1231 / 12-5-2012 1123 / 12-6-2012		Permit Expiration Date January 31, 2013
	ne(s) of On-Site Representative(s)/Tensis Brunson / Pretreatment Coord			iber(s)				er Facility Data S# 069378
Nan	ne, Address of Responsible Official/	Title/	Phone and Fax Numb)er				
						Contacted		
	hard Penn / Utilities Director / 501 Box 700	321-	6810			Yes No		
Hot	Springs, AR 71901							
						During Inspection (isfactory, N = Not Evaluated)		
	Permit		Flow Measuremen	nt	0	perations & Maintenance		Sampling
	Records/Reports		Self-Monitoring P	Program	Sl	udge Handling/Disposal		Pollution Prevention
	Facility Site Review		Compliance Schee	dules	dules S Pretreatment			Multimedia
Effluent/Receiving Waters Laboratory						orm Water		Other:
		Se	ection D: Summary of	of Findings/Con	iments (A	ttach additional sheets if necessary)	
			*70					
			*1h	us inspection rev	vealed no	permit violations.		
Nar	ne(s) and Signature(s) of Inspector(s			Agency/Office/	/Telephone	:		Date
Sha	n Lynch Shan Lynch			ADEQ / Dist. 7	7 / (870) 38	89-6970		December 17, 2012
	•							
Signature of Reviewer Agency/Office/Phone					e/Phone and	l Fax Numbers		Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

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: Audit / August 2011					
Date of Last Annual Report: January 24, 2012					
Name of Inspector: Shan Lynch					
Date PCI Performed: December 5 & 6, 2012					
Name, Title, and Telephone Number of Facility Representative:					
Dennis Brunson / Pretreatment Coordinator / 501 262-1881					
Name and Title of Other Participants: None					
Number of IUs Visited: 2					
Number of fos visited: Z					
Name(s) of IUs Visited: Triumph Fabrications, Triumph Airborne					
Structures					
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED					
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					

ADEQ Water NPDES Inspection

Α.	INDUSTRIAL USER SUP	RVEY					
1.		ant Industrial Users (S					
	been added or deleted from the program since the last audit						
	or inspection. Added Ryan's Family Steakhouse. Deleted						
	Ryan's Family Steakhouse, Hot Springs Packing Co., National						
		er,, St. Joseph Mercy H s, Inc., Waycaster Oil	lealth Cente	er,			
2.	Has ADEQ or EPA be	een notified of these of	changes? Y	ES			
3.	HAS THE INDUSTRIAN	USER SURVEY BEEN KEP	UPDATED?	YES			
4.		re being used to update					
		New Industry information					
		ry contact prior to u	ility hook-	-up, visual			
	Observation.						
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) 4						
6							
6.	Number of Categorical Industrial Users: 3						
7.	How does the POTW determine the appropriate categorical						
1.		to an IU? Federal Re		rical			
	standards to appry	2 to all 10? Federal Re	guiacions				
8.	List all categoric	cal IUs discharging und	ler the appr	coved (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.					
Nam	e of IU:	Category:	Regulated	Process:			
NON	E						
Tri	umph Airborne	Metal Finishing	Anodizing				
Tri	umph Fabrications	Metal Finishing	Anodizing				
Mid	-America Dist.	Waste Oil Treatment	Used Oil R	ecovery			

AD	EQ Water NPDES I	nspection AFIN	: 26-00145	Permit #: AR0	033880
<u>B.</u> 1.	LOCAL LIM IS THE PO BY ADEQ (OTW APPLYING I	OCAL LIMITS WE	IICH HAVE BEEN	I APPROVED
2.	Describe NONE	any apparent	problems with	the local lim	nits.
3.	sludge pe requireme	erformed by the ents of the ap	nt scans of POT ne POTW? Does oproved program art III of the	this fulfill n (as describe	the ed in
			Requirem	ent in	
Pol	lutant:	Frequency:	Permit:	Program:	Comments:
	als: nfluent:	1/Qtr	1/Qtr	* not stated	
Ef	fluent:	1/Qtr	1/Qtr	* not stated	
Sludge:		1/Qtr	1/Qtr	1/Qtr * not stated	
-	anics: nfluent:	1/YR	1/YR	* not stated	
Εf	fluent:	1/YR	1/Qtr	* not stated	
	Sludge:	1/YR	1/Qtr	* not stated	

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 upsets or inhibitions have occurred since the last PCI.

ADEQ Water NPDES Inspection	
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Permit #: AR0033880

С.	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? 4					
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:					
	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: * not stated in permit					
	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	E	Y POTW		
1.	Indicate current in	ns	pection and sampling frequ	lency and program	
	requirement below:				
			Current frequency:	Program Requirement:	
	Sampling:				
	categorical IUs		1/Qtr	2/YR	
	other SIUs		1/Qtr	2/YR	
	Inspection:				
	categorical IUs		1/YR	1/YR	
			1/1R	1/ IR	
	other SIUs		1/YR	1/YR	
	000000000000000000000000000000000000000		1/18	1/16	
2.	UNC ENCU CILL DEEN	TN	SPECTED AND SAMPLED AT THE	EDECIIENCY	
2.			1	FREQUENCI	
	REQUIRED BY THE AP	PR	OVED PROGRAM? YES		
2					
3.	Are inspections and	no	unced or unannounced?	ANNOUNCED	
4.	Are records kept of	È	each inspection? YES		
			· · ·		
5.					
	the following:				
	Date and time of in	ns	pection: YES		
	Officials present:		YES		
	Inspection of chemical storage areas: NO				
	Description of regulated processes, categorical waste streams, and				
	discharge location of these waste streams: YES				
	Inspection of the pretreatment facilities: YES				
	Review of self-mon	it	oring records: YES		
			L		
	Observation of IU :	se	lf-monitoring procedures:	YES	
				•	
	Verification that a	ap	proved analytical techniqu	les are used: YES	
		-	- 4	I	
	Verification of IU	f	low measurement (where req	uired): YES	
		_			
6.	Overall adequacy o	£	inspection documentation:	SATISFACTORY	
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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? By maintaining computerized copies of self-				
	monitoring reports and inspection reports				
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				

ADEQ Water NPDES Inspection

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: N/A				
	Other environmental permits held: N/A				
	Description of operations: N/A				
	Process flow diagrams: N/A				
	Flow measurements: N/A				
	Measurements of regulated pollutants: N/A				
	Certification of compliance by the IU: N/A				
	Compliance schedule (if needed): N/A				
19.	Additional comments on the POTW's inspection and sampling				
	procedures: Inspection and sampling procedures meet the				
	required elements of the permit.				

ADEQ Water NPDES Inspection

Enforcement	-						
HAS THE PO	rw	IMPLEMENTED ENF(DR	CEMENT RESPONSE	PI	ROCEDURES TO	
ADEQUATELY	A	DRESS EVERY IU	JI	OLATION OF PRETR	EZ	ATMENT	
		~~~~~					
How does th	പെ	DOTW respond to	+	he following vic	1:	ations?	
	.10		U.	ine rorrowing vie	10		
Ffluent l	im	itations: Phone	02	11			
BILLUCIIC I.	<u>_ [[[</u>			***			
Late report	- 9	: Phone call, le	·++	er			
Lace report							
IInpermitter	، F	lischarges: Phon	e	call, letter			
ouper mreced	. ·						
Sheel puls	0.	c gnille: Phone	Ca	ll letter not	if		
Siug Idaus	0.			iii, iecter, not	**	Y ADEQ	
דמ ייני דמי	<b>г</b> /			ד איד הספ הווסו דפעידי	\ T	סע קנד הטענ	
-							
_		—					
to the point of being published in the paper							
construction is required, please indicate whether the IU							
has been p	la	ced on an enforce	ea	ble compliance s	scł	nedule.	
			1	1			
				Enforcement		Compliance	
Name:		Violation:		Action:		Deadline:	
				Fines		Facility	
an's		1)Fats, Oils,		1 11100		TUCTTIC	
an's		Grease.				bankrupt and	
an's						_	
an's		Grease.				bankrupt and	
an's		Grease. 2)pH <6 or >11				bankrupt and out of	
an's		Grease. 2)pH <6 or >11 3)Causing				bankrupt and out of	
an's		Grease. 2)pH <6 or >11 3)Causing corrosive				bankrupt and out of	
	HAS THE PO ADEQUATELY STANDARDS 2 STANDARDS 2 How does the Effluent 1: Late report Unpermitted Slug loads IS THE LIS DEVELOPED SIGNIFICAN 1985)? Rya compliance to the poin List the S Violator wi enforcement construction has been p	HAS THE POTW ADEQUATELY AI STANDARDS ANI STANDARDS ANI How does the Effluent lim: Late reports Unpermitted of Slug loads of IS THE LIST ( DEVELOPED IN SIGNIFICANT ( 1985)? Ryan' Compliance. to the point List the SIUS Violator with enforcement a construction has been place	HAS THE POTW IMPLEMENTED ENFO ADEQUATELY ADDRESS EVERY IU Y STANDARDS AND REQUIREMENTS? How does the POTW respond to Effluent limitations: Phone Late reports: Phone call, le Unpermitted discharges: Phone Slug loads or spills: Phone IS THE LIST OF SIGNIFICANT V DEVELOPED IN ACCORDANCE WITH SIGNIFICANT VIOLATING INDUSTH 1985)? Ryan's Family Steakho compliance. However, this fat to the point of being publish List the SIUs which have met Violator within the last 12 r enforcement action which has construction is required, ple has been placed on an enforce	HAS THE POTW IMPLEMENTED ENFOR ADEQUATELY ADDRESS EVERY IU VI STANDARDS AND REQUIREMENTS? Y How does the POTW respond to t Effluent limitations: Phone ca Late reports: Phone call, lett Unpermitted discharges: Phone Slug loads or spills: Phone ca IS THE LIST OF SIGNIFICANT VIO DEVELOPED IN ACCORDANCE WITH SIGNIFICANT VIOLATING INDUSTRI 1985)? Ryan's Family Steakhous compliance. However, this fac to the point of being publishe List the SIUs which have met t Violator within the last 12 mo enforcement action which has b construction is required, plea has been placed on an enforcea	HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE   ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETE   STANDARDS AND REQUIREMENTS? YES   How does the POTW respond to the following vid   Effluent limitations: Phone call   Late reports: Phone call, letter   Unpermitted discharges: Phone call, letter   Slug loads or spills: Phone call, letter, not   IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHET DEVELOPED IN ACCORDANCE WITH EPA REGION VI CE   SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED A 1985)?   Ryan's Family Steakhouse was found to T compliance. However, this facility went out co   List the SIUs which have met the criteria for Violator within the last 12 months, and descri   enforcement action which has been taken by the construction is required, please indicate whet   How of the paint of the proceed on an enforceable compliance set Type of	HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PI   ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREZ   STANDARDS AND REQUIREMENTS? YES   How does the POTW respond to the following viola   Effluent limitations: Phone call   Late reports: Phone call, letter   Unpermitted discharges: Phone call, letter   Slug loads or spills: Phone call, letter, notif   IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED I DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRI:   SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUG 1985)?   Ryan's Family Steakhouse was found to be compliance. However, this facility went out of   to the point of being published in the paper List the SIUs which have met the criteria for S:   Violator within the last 12 months, and describe enforcement action which has been taken by the I   construction is required, please indicate whethe has been placed on an enforceable compliance scl	

5.	Comments on the POTW's enforcement procedures:
	Appear satisfactory at this time.
F.	POTW'S PRETREATMENT ORGANIZATION STRUCTURE
1.	Is the program structure essentially the same as that
	presented in the approved pretreatment program? YES
2.	Are staffing levels adequate? YES
3.	Are the responsible officials familiar with the approved
	program? YES
a	
G.	MULTIJURISDICTIONAL ISSUES
1	List one THE which are leasted outside of the
1.	List any IUs which are located outside of the jurisdictional area of the POTW: None
2.	Does the POTW have adequate procedures for controlling IUs
2.	located outside its jurisdictional area? N/A
3.	Does the POTW have copies of permits for IUs in other
	cities? NO
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
5.	Comments on multijurisdictional issues: N/A

AFIN: 26-00145
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	EVALUATION								
No	violations	were	noted	at	the	time	of	the	inspection.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Triumph Fabrications							
POTW Name: City of Hot Springs							
Industry Contacts: Michael Corballis / Environmental Manager							
Jason Halley / Environmental Supervisor							
Date and Time of Visit: December 6, 2012 / 0819							
Description of Manufacturing Process: Anodized metal finisher.							
Chemical milling. Fabrication and milling of airplane parts.							
Sources of Process Wastewater: Air scrubber water and rinse							
operations used after anodizing and etching.							
Categorical Industry? YES							
Basis for Limits: Anodizing (local limits)							
Point of Application: End of process							
Description of Pretreatment Equipment and Procedures: Chrome							
reduction, pH neutralization, flocculation, clarification,							
sludge press.							
Spill Prevention and Solvent Management Procedures:							
Sampling Location and Equipment: ISCO automatic sampler located							
at the discharge site.							

Name of Industry: Triumph Airborne Structures, Inc.						
POTW Name: City of Hot Springs						
Industry Contacts: Ed Albritton / Environmental and Maintenance						
Manager						
Date and Time of Visit: December 6, 2012 / 1014						
Description of Manufacturing Process: Anodized metal finisher.						
Fabrication and milling of airplane parts.						
Sources of Process Wastewater: Air scrubber water and rinse						
operations used after etching baths.						
Categorical Industry? YES						
Basis for Limits: Anodizing (local limits)						
Point of Application: End of process						
Description of Pretreatment Equipment and Procedures: Chrome						
reduction, pH adjustment, clarification, sludge thickener,						
filter press.						
Spill Prevention and Solvent Management Procedures:						
Sampling Location and Equipment: Composite sampler located at						
manhole just outside facility.						

## PPETS CODE SHEET

## PRETREATMENT COMPLIANCE INSPECTION (PCI)

			CODE			
INSPECTOR'S NAME:	SPECTOR'S NAME: Shan Lynch					
NAME OF FACILITY:	City o	f Hot Springs				
PERMIT NUMBER USED	A					
TO TRACK PROGRAM:			NPID			
DATE OF PCI:	Decer	DTIA				
	PPETS WENDB DATA	A ELEMENTS				
NUMBER OF SIGNIFICA	NT IUS (SIUS):	4	SIUS			
NUMBER OF CATEGORIC	AL IUS:	3	CIUS			
SIUS NOT SAMPLED OR	INSPECTED BY					
POTW:		0	NOIN			
SIUS WITHOUT CONTRO	L MECHANISM:	0	NOCM			
SIUS IN SIGNIFICANT	NONCOMPLIANCE					
WITH STANDARDS OR R		0	PSNC			
SIUS IN SIGNIFICANT	NONCOMPLIANCE					
WITH SELF-MONITORIN	G REQUIREMENTS:	0	MSNC			
SIUS IN SIGNIFICANT	NONCOMPLIANCE					
WITH SELF-MONITORIN	G AND NOT					
INSPECTED OR SAMPLE	D BY POTW:	0	SNIN			