



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,

A handwritten signature in black ink that reads "Shan Lynch". The signature is written in a cursive, flowing style.

Shan Lynch
District Field Inspector
Water Division

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880
-----------------------------	----------------	---------------------

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
Name(s) of IUs Visited:		Triumph Fabrications, Triumph Airborne Structures
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED		
<p>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.</p>		
Form approved July 1989		

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880
-----------------------------	-----------------------	----------------------------

A. INDUSTRIAL USER SURVEY

[illegible]

B. LOCAL LIMITS

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

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

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 Permit:	Program:	Comments:
Metals:				
Influent:	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>* not stated</u>	
Effluent:	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>* not stated</u>	
Sludge:	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>* not stated</u>	
Organics:				
Influent:	<u>1/YR</u>	<u>1/YR</u>	<u>* not stated</u>	
Effluent:	<u>1/YR</u>	<u>1/Qtr</u>	<u>* not stated</u>	
Sludge:	<u>1/YR</u>	<u>1/Qtr</u>	<u>* not stated</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 upsets or inhibitions have occurred since the last PCI.

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?		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	

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880
-----------------------------	----------------	---------------------

D. MONITORING OF IUS BY POTW			
1. Indicate current inspection and sampling frequency 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
other SIUs	1/YR		1/YR
2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? YES			
3. Are inspections announced or unannounced? ANNOUNCED			
4. Are records kept of each inspection? YES			
5. Does the inspection report contain an adequate description of the following:			
Date and time of inspection: 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-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: SATISFACTORY			

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880
-----------------------------	----------------	---------------------

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	AFIN: 26-00145	Permit #: AR0033880
-----------------------------	-----------------------	----------------------------

[illegible]

E. Enforcement

1.	HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS?	
		YES

2.	How does the POTW respond to the following violations?
----	--

Effluent limitations:	Phone call
-----------------------	------------

Late reports:	Phone call, letter
---------------	--------------------

Unpermitted discharges:	Phone call, letter
-------------------------	---------------------------

Slug loads or spills:	Phone call, letter, notify ADEQ
-----------------------	---------------------------------

3.	IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)?
	Ryan's Family Steakhouse was found to be out of compliance. However, this facility went out of business prior to the point of being published in the paper

4.	List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.
----	--

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
Ryan's	1)Fats, Oils, Grease.	Fines	Facility bankrupt and out of business
	2)pH <6 or >11		
	3)Causing corrosive structural damage		

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880
-----------------------------	----------------	---------------------

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	
G. MULTIJURISDICTIONAL ISSUES		
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 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	

H. EVALUATION AND COMMENTS

No violations were noted at the time of the inspection.

[illegible]

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880
-----------------------------	----------------	---------------------

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.		

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880
-----------------------------	----------------	---------------------

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.		

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880
-----------------------------	-----------------------	----------------------------

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	Shan Lynch	
NAME OF FACILITY:	City of Hot Springs	
PERMIT NUMBER USED TO TRACK PROGRAM:	AR0033880	NPID
DATE OF PCI:	December 5, 2012	DTIA
PPETS WENDB DATA ELEMENTS		
NUMBER OF SIGNIFICANT IUS (SIUS):	4	SIUS
NUMBER OF CATEGORICAL IUS:	3	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	0	NOIN
SIUS WITHOUT CONTROL MECHANISM:	0	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	0	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	0	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	0	SNIN