DIVISION OF ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

September 17, 2025

Monty Ledbetter, Utilities Director
City of Hot Springs Pretreatment Program
320 Davidson Drive
Hot Springs, AR 71901
Email Address: mledbetter@city-hs.net

RE: City of Hot Springs Pretreatment Compliance Inspection - PDS# 133954 (Garland Co.)
AFIN: 26-00145 Permit No.: AR0033880

Dear Mr. Ledbetter:

On August 14, 2025, I performed a Pretreatment Compliance Inspection of the above-referenced 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. A copy of the inspection report is enclosed for your records.

No violations were noted at the time of the inspection. Please refer to the inspection report for any comments. If I can be of any assistance, please contact me at travis.harmon@arkansas.gov or (501) 837-2070.

Sincerely,

Travis Harmon

Travis Harmon
Inspector II, Office of Water Quality

CC via email: dbrunson@cvity-hs.net

ENVIRONMENTAL QUALITY

# OFFICE OF WATER QUALITY INSPECTION REPORT

| | | |
|---|---|---|
| AFIN: **26-00145** | PERMIT #: **AR0033880** | DATE: **8/14/2025** |
| COUNTY: **26 Garland** | PDS #: **133954** | MEDIA: **WN** |

GPS LAT: **34.450306** LONG: **-93.019033** LOCATION: **General Area**

## FACILITY INFORMATION

NAME:
**City Hot Springs-Pretreatment**

LOCATION:
**320 Davidson Drive**

CITY:
**Hot Springs, AR 71901**

## RESPONSIBLE OFFICIAL

NAME: / TITLE
**Monty Ledbetter / Utilities Director**

COMPANY:
**City of Hot Springs POTW**

MAILING ADDRESS:
**320 Davidson Drive**

CITY, STATE, ZIP:
**Hot Springs AR 71901**

PHONE & EXT: / FAX:
**501-262-1881 /**

EMAIL:
**mledbetter@city-hs.net**

CONTACTED DURING INSPECTION: **No**

## INSPECTION INFORMATION

| | |
|---|---|
| FACILITY TYPE: **1 - Municipal** | INSPECTOR ID#: **34689 S - State** |
| FACILITY EVALUATION RATING: **N** | INSPECTION TYPE: **Pretreatment Compliance** |

| DATE(S): | ENTRY TIME: | EXIT TIME: | PERMIT EFFECTIVE DATE: | PERMIT EXPIRATION DATE: |
|---|---|---|---|---|
| **8/14/2025** | **11:00** | **15:15** | **7/1/2024** | **6/30/2029** |

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

## INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
**Dennis Brunson/ Pretreatment Coordinator/ 501-262-1881 ext. 2861/ dbrunson@city-hs.net**

## AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

| | | | | | |
|---|---|---|---|---|---|
| **S** | PERMIT | **N** | FLOW MEASUREMENT | **N** | STORMWATER |
| **N** | RECORDS/REPORTS | **N** | LABORATORY | **N** | FACILITY SITE REVIEW |
| **N** | OPERATION & MAINTENANCE | **N** | EFFLUENT/RECEIVING WATER | **N** | SELF-MONITORING PROGRAM |
| **N** | SAMPLING | **N** | SLUDGE HANDLING/DISPOSAL | **S** | PRETREATMENT |
| **N** | OTHER: | | | | |

## SUMMARY OF FINDINGS

**I found no permit violations concerning the facility pretreatment program at the time of inspection**

**GENERAL COMMENTS**

**Introduction**

**I conducted the inspection on August 14, 2025. Mr. Dennis Brunson, Pretreatment Coordinator, represented the City of Hot Springs. The city operates two wastewater treatment plants; and has three categorical industrial users and one significant industrial user discharging process wastewater to the plants.**

**Pretreatment Program Records Review**

**I completed the program information sheets, beginning on page 3 of this report. Mr. Brunson answered all questions and provided hard copies of all information listed in the review. He also provided copies of industrial user permits as well as industrial user inspections for review. The city's pretreatment annual report for the 2024 calendar year was submitted on January 28, 2025.**

**Industrial User Inspections**

**I also inspected the pretreatment systems at two categorical users: ORG Chem-Group, centralized waste, and AAR Components, metal finishing, during the pretreatment inspection. I found no compliance issues concerning the two pretreatment systems at the time of inspection. Industrial User inspection reports are PDS# 133955, ORG Chem-Group, and PDS# 133956, AAR Components.**

| | |
|---|---|
| INSPECTOR'S SIGNATURE: Travis Harmon **Travis Harmon** | DATE: **9/5/2025** |
| SUPERVISOR'S SIGNATURE: Amy Huneycutt **Amy Huneycutt** | DATE: **9/9/2025** |

**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.

**None**

2. Has ADEQ or EPA been notified of these changes?

**N/A**

3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?

**Yes**

4. What procedures are being used to update the IU Survey?

**Water connections, wastewater surveys, and permit applications**

5. Total number of Significant Industrial Users, according to the definition used by the POTW:

**4**

6. Number of Categorical Industrial Users:

**3**

7. How does the POTW determine the appropriate categorical standards to apply to an IU?

**40 CFR 433**

8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU and the regulatory category (i.e. Metal Finishing).

| Name of IU: | Category: |
|---|---|
| **Radius Aerospace** | **Metal Finishing** |
| **AAR Components** | **Metal Finishing** |
| **ORG Chem-Group** | **Centralized Waste** |

**B. LOCAL LIMITS**

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

**Approved by ADEQ- Division of Energy and Environment**

2. Describe any apparent problems with the local limits.

**None, but some arsenic**

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:** | | **Sampling Frequency** | | **Permit Requirement** | | **Program Requirement** |
|---|---|---|---|---|---|---|
| Metals | | | | | | |
| Influent: | | **Quarterly** | | **Quarterly** | | **Quarterly** |
| Effluent: | | **Quarterly** | | **Quarterly** | | **Quarterly** |
| | | | | | | |
| Organics | | | | | | |
| Influent: | | **2 per year** | | **Annually** | | **Annually** |
| Effluent: | | **2 per year** | | **Annually** | | **Annually** |

| |
|---|
| 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 POTW to ensure that the incident will not occur again. Were these actions effective? |
| **No** |
| **C. INDUSTRIAL USER CONTROL MECHANISM** |
| 1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? |
| **Permits** |
| 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 THE DELAY IN ISSUING THE REQUIRED DOCUMENT. |
| **Yes** |
| 4. Does the control document contain the following items? List the section of the permit each item is listed under. |
| An expiration date: **Yes** |
| Discharge limitations: **Yes** |
| |
| If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under. |
| IU self-monitoring requirements: **Yes** |
| IU reporting requirements: **Yes** |
| |
| 5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under. |
| Sample location: **2.b** |
| Type of sample: **2.b 24 hour Composite** |
| Monitoring frequency: **2.b** |
| Bypass prohibition: **Section 3.b** |
| Right of entry: **Section 4.b** |
| Non-transferability: **4.f** |
| Revocation clause: **4.h** |
| Penalty Provisions: **6** |
| Slug load notification: **3.a** |
| Notification of process change: **3.c** |
| **Requires licensed operator each shift, auto shutdown and containment requirements** |

**D. MONITORING OF IUS BY POTW**

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

| | Current frequency: | Program Requirements: |
|---|---|---|
| Sampling | | |
| Categorical IUs | **Quarterly** | **2 per year** |
| Other SIUs | **Quarterly** | **2 per year** |
| Non-SIUs | | |
| | | |
| Inspection | | |
| Categorical IUs | **Annually** | **Annually** |
| Other SIUs | **Annually** | **Annually** |
| Non-SIUs | **Annually** | **Annually** |

Comments:

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: 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: No**

**Verification that approved analytical techniques are used: Yes**

**Verification of IU flow measurement (where required): Yes**

6. Please describe the overall adequacy of inspection documentation:

**Adequate**

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. Are sampling locations identified in POTW records?

**Yes- IU Permits**

12. Are sampling services available in an emergency?

**Yes**

13. 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?

**Iu's send PDF copies and follow up with hard copies**

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

**Yes**

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

**NOV certified letter, with required additional monitoring**

**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: NOV, certified letter**

**Late reports: Phone call**

**Unpermitted discharges: NOV certified letter**

**Slug loads or spills: NOV certified letter**

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)?

**N/A, none required in recent years**

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: |
|---|---|---|---|---|---|---|
| **None** | | | | | | |
| | | | | | | |

**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?

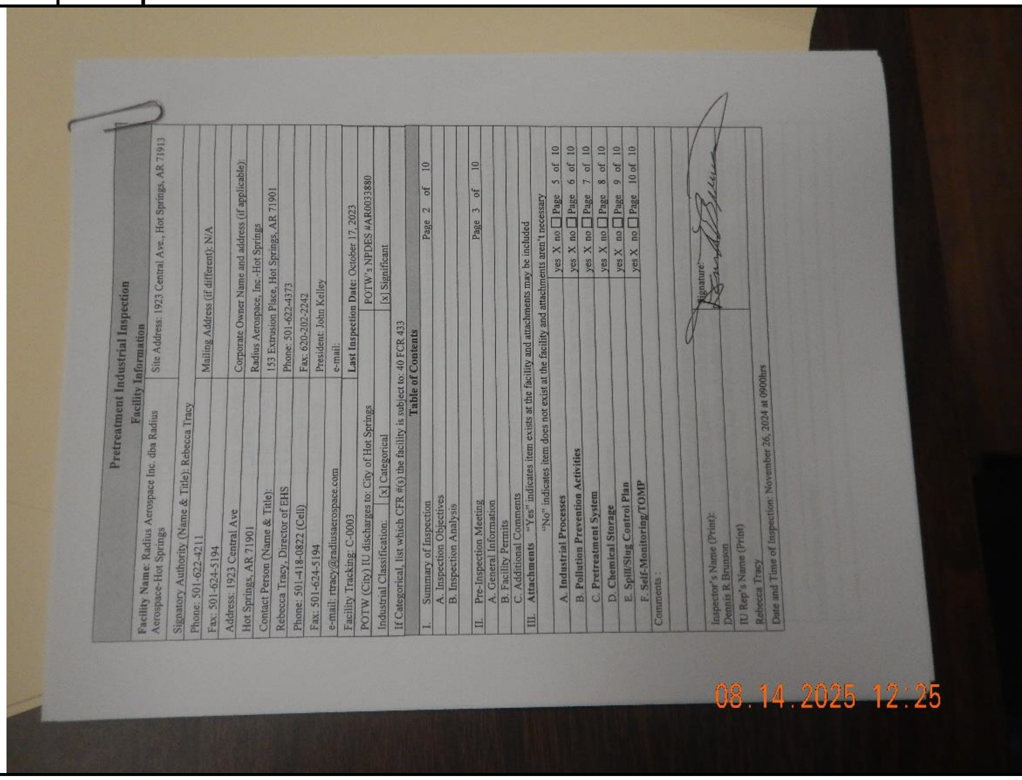
**Yes, Coordinator and an inspector**

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

| **Office of Water Quality Photographic Evidence Sheet** | | | | | |
|---|---|---|---|---|---|
| Location: | **City Hot Springs-Pretreatment** | | | | |
| Photographer: | **Travis Harmon** | Date: | **August 14, 2025** | Time: | **1225** |
| Witness: | **None- no other regulatory personnel** | | | Photo #: | **1** |
| Description: | **IU inspection cover** | | | | |




| | | | | | |
|---|---|---|---|---|---|
| Photographer: | **Travis Harmon** | Date: | **August 14, 2025** | Time: | **1227** |
| Witness: | **None** | | | Photo #: | **2** |
| Description: | **IU inspection summary** | | | | |