



**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,

A handwritten signature in black ink that reads "Travis Harmon".

Travis Harmon
Inspector II, Office of Water Quality

CC via email: dbrunson@city-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			INSPECTION INFORMATION			
NAME: City Hot Springs-Pretreatment LOCATION: 320 Davidson Drive CITY: Hot Springs, AR 71901			FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 34689 S - State	
			FACILITY EVALUATION RATING: N		INSPECTION TYPE: Pretreatment Compliance	
			DATE(S): 8/14/2025	ENTRY TIME: 11:00	EXIT TIME: 15:15	PERMIT EFFECTIVE DATE: 7/1/2024
			PERMIT EXPIRATION DATE: 6/30/2029			
RESPONSIBLE OFFICIAL			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			
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						
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

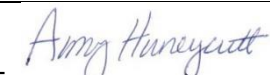
I conducted the inspection on August 14, 2025. Mr. Dennis Brunson, Pretreatment Coordinator, represented the City of Hot Springs. The city operates two wastewater treatment plants; and has three categorical industrial users and one significant industrial user discharging process wastewater to the plants.

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	DATE: 9/5/2025
SUPERVISOR'S SIGNATURE:	 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:	
<u>Sampling</u>			
Categorical IUs	Quarterly	2 per year	
Other SIUs	Quarterly	2 per year	
Non-SIUs			
<u>Inspection</u>			
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.																									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Name:</th> <th style="width: 10%;"></th> <th style="width: 20%;">Type of Violation:</th> <th style="width: 10%;"></th> <th style="width: 20%;">Enforcement Action:</th> <th style="width: 10%;"></th> <th style="width: 20%;">Compliance Deadline:</th> </tr> </thead> <tbody> <tr> <td>None</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Name:		Type of Violation:		Enforcement Action:		Compliance Deadline:	None													
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

Pretreatment Industrial Inspection Facility Information	
Facility Name: Radius Aerospace Inc. dba Radius Aerospace-Hot Springs Phone: 501-624-4211 Signature Authority (Name & Title): Rebecca Tracy Address: 1923 Central Ave Hot Springs, AR 71901 Contact Person (Name & Title): Rebecca Tracy, Director of HHS Phone: 501-418-0822 (Cell) Fax: 501-624-5194 e-mail: rebecca.tracy@radiusaerospace.com Facility Tracking: C-0003	Site Address: 1923 Central Ave., Hot Springs, AR 71913 Mailing Address (if different): N/A Corporate Owner Name and address (if applicable): Radius Aerospace, Inc.-Hot Springs 1315 Extension Place, Hot Springs, AR 71901 Phone: 501-624-4273 Fax: 501-624-2245 President: John Kelly e-mail:
POTW (CDD) IU discharges to City of Hot Springs Industrial Classification: [x] Commercial If Categorical list which CFR 40.1 the facility is subject to, do CFR 413	Last Inspection Date: October 17, 2023 POTW's WPDDES AKA00313800
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B. Inspection Analysis	
II. Pre-Inspection Meeting	Page 3 of 10
A. General Information	
B. Facility Permits	
C. Additional Comments	
III. Attachments	
*No " indicates item exists at the facility and attachments may be included *No " indicates item does not exist at the facility and attachments aren't necessary	
A. Industrial Processes	yes X no ☐ Page 3 of 10
B. Pollution Prevention Activities	yes X no ☐ Page 5 of 10
C. Pretreatment System	yes X no ☐ Page 7 of 10
D. Chemical Storage	yes X no ☐ Page 8 of 10
E. Spill Spill Contained Pias	yes X no ☐ Page 9 of 10
F. Self-Monitoring/TDMP	yes X no ☐ Page 10 of 10
Comments:	
Inspector's Name (Print): Dennis R. Brunton IU Rep's Name (Print): Rebecca Tracy Date and Time of Inspection: November 26, 2024 at 0900hrs	

☐ Permit Renewal		I. Summary of Inspection	
☐ New Construction		A. Inspection and Observations	
Inspection Observation(s)		☒ Visual	☒ Active Complaint
		☐ Noncompliance	☐ Before/After Inspection
Checklist of items to be reviewed and/or visually inspected		☐ Sampling	☐ Unchecked/Not Compliant
☒ Process Inspection Meeting		☐ Sampling	
☒ Chemicals		☐ Sampling	
☒ Records Storage		☐ Sampling	
☒ H ₂ S sampling procedures		☐ Safety Concerns	
☒ MSDS Inventory List		☐ Spill/Slug Control Plan	
Comments:		☐ Calibration Records	
		☐ Calibration Records	
B. Inspection Analysis			
Were there any deficiencies/violations identified and noted during the inspection? X Yes ☐ No			
Provide a brief narrative of deficiencies/violations or other concerns in the following text:			
TOMP was updated 11/26/2024 to reflect updated emergency contacts, responsible person etc. A copy was delivered to the City of Hot Springs in 11/26/2024.			
Process Area(s) Overall housekeeping has improved since the last annual review. Industry has developed a SOP for equipment and general housekeeping. Housekeeping has been added to the maintenance schedule of all tank, m's, and equipment in the EAM system with SS audits being conducted monthly.			
Pretreatment System: The industry's waste treatment process is meeting permit limits. The overall housekeeping has improved. Painting is still being done for corrosion on the structural frames for the waste treatment process tanks. The pad that housed the WTP chemicals has been repaved with new rebar and concrete. Industry is currently conducting a vapor test before adding a chemically resistant coat to the pad.			
Self-Monitoring Procedures: Compliant			
Diversion/Sewer Meters: N/A			
Spill/Slug Control Plan: Boric Sulfuric Acid Anodizing process and return to Cr Acid Anodizing. Sulfuric Acid Anodizing is still indicated in the Process. Updates need to be made: (emergency contacts, responsible person/agencies, protocols, etc.) Sulfuric Anodizing is still in process as well as Chromic Acid Anodizing. The only one removed is Boric Acid. The Slug control plan was updated 9/25/2023 to reflect the name change for Radius Aerospace, Inc.			
Sampling Point: Compliant			
Chemical Storage: Compliant			