

December 3, 2020

WH Calvin Murdock, Utility Manager City of Forrest City PO Box 816 Forrest City, AR -723661074

RE: Forrest City Wastewater Treatment Plant Inspections (St. Francis Co)

AFIN: 62-00070 NPDES Permit No.: AR0020087 62-00408 ARR000222

Dear Mr. Murdock:

On September 22, 2020, I performed a Compliance Evaluation Inspection, an SSO/Collection System Inspection, and an Industrial Stormwater 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 each of the inspection reports is enclosed for your records.

No violations were noted at the time of the inspections. Please refer to each of the attached inspection reports for any comments. If I can be of any assistance, please contact me at mccabe@adeq.state.ar.us or (501) 682-0642.

Sincerely,

Kerri McCabe

Kerri Ms Coly

Inspector Supervisor, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118

CC: Joel R Thetford, City of Forrest City, WW Supervisor, thet24@msn.com



ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **62-00070** PERMIT #: **AR0020087** DATE: **9/22/2020**

COUNTY: **62 St. Francis** PDS #: **114212** MEDIA: **WN**

GPS LAT: 34.998147 LONG: -90.835217 LOCATION: Entrance

FACILITY INFORMATION INSPECTION INFORMATION						
Forrest City Wastewater Treatment Plant	FACILITY TYPE: INSPECTOR ID#: 84022 S - State					
320 SFC 209	3 - Satisfactory		Compliance Evaluation			
Forrest City, AR	DATE(S): ENT 9/22/2020 09	FRY TIME: EXIT 12:	PERMIT EFFECTIVE DATE:			
RESPONSIBLE OFFICIAL			PERMIT EXPIRATION DATE:			
NAME: / TITLE WH Calvin Murdock / Utility Manager			10/31/2022			
COMPANY:	FAYETTEVILLE SHALE RELATED: N					
City of Forrest City MAILING ADDRESS:	FAYETTEVILLE SHALE VIOLATIONS: N					
303 N Rosser Street PO Box 816			PARTICIPANTS			
CITY, STATE, ZIP: Forrest City AR -723661074 PHONE & EXT: / FAX:	Edward Gregory III/Advanced Ind	, Water Sup				
870-633-2921 / 870-633-5921			ass I; Lic. #013090)			
whcm2@aol.com	Joel R Thetford, Wastewater Supervisor (Class III/Advanced Industrial; Lic. #005326) - via email only					
CONTACTED DURING INSPECTION: Yes	iii/Auvanceu inu	iustrial, Lic.	#003320j - via eman omy			

	AREA EVALUATIONS							
	(S=S	atisfac	tory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Eva	luated				
S	PERMIT	S	FLOW MEASUREMENT	S	STORMWATER			
S	RECORDS/REPORTS	G	LABORATORY	S	FACILITY SITE REVIEW			
M	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM			
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT			
**	** OTHER:							
			SUMMARY OF FINDINGS					

No violations noted at the time of the inspection.

Please see attached email dated Sept 23, 2020 sent to city personnel providing immediate feedback regarding the inspection.

GENERAL COMMENTS

On Tue, Sept 22, 2020, an inspection was conducted with the above mentioned inspection participants. The inspection consisted of a site assessment and a records review.

Site Assessment:

Treatment consists of preliminary (bar screen and grit removal), aeration basins (3; ran parallel) for activated sludge, clarification (3; ran parallel; 15' deep and maintain a 3' blanket), UV disinfection (cleaning frequency based on FCB results), primary/secondary flow measurement, post-aeration, and discharge to Outfall 001. The former lagoon system (two, 72-acre ponds) is used for flow EQ and sludge wasting. If the generator goes down, gates at a splitter box open to direct influent to EQ/sludge lagoons. The water in the EQ/sludge lagoons is either routed back through the treatment system or discharged though the UV unit for discharge to Outfall 001 (bypass).

Only minor issues noted with treatment system: blower system is not maintained properly and has to be bled off and the diffuse air distribution system for the middle aeration basin is not working properly. The middle clarifier is not used due to poor engineered design, but this component is not needed at this time.

City personnel report conducting some process control: aeration basin BOD5/CBOD5, aeration basin TSS, influent flow measurement, and once/week settling test.

Records Review:

Records for April 2019 were requested for review. Records were supplied via email and are deemed complete. The city runs an in-house lab for process control only, and all effluent monitoring, with the exception of instantaneous parameters (flow, DO, and pH), is conducted by a contract lab. No major issues with city documents or contract lab Chains of Custody (COC) and analysis sheets.

Kerri Mª Coly	
INSPECTOR'S SIGNATURE: Kerri McCabe	DATE: 11/30/2020
Jana R. Blillian	
SUPERVISOR'S SIGNATURE: Jason Bolenbaugh	DATE: 12/3/2020

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	⊠S □M □U □NA □NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: Elected mayor has changed to Cedrick Williams.	☑Y □N □NA □NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□Y □N ☑NA □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y □N □NA □NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y □N □NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S □M □U □NA □NE
DETAILS: Operator collects/analyzes flow, DO, and pH; contract labs for other parameters	<u>s.</u>
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m □u □na □ne
a. DATES AND TIME(S) OF SAMPLING:	☑Y □N □NA □NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y □N □NA □NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y □N □NA □NE
e. RESULTS OF CALIBRATIONS:	☑Y □N □NA □NE
f. RESULTS OF ANALYSES:	☑Y □N □NA □NE
g. DATES AND TIMES OF ANALYSES:	☑Y □N □NA □NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y □N □NA □NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	⊠s □m □u □na □ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	□s □m □u □na ☑ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y □N □NA □NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S ☑M □U □NA □NE
DETAILS: Preliminary (bar screen and grit removal), aeration basins for activated sludge	
(ran in parallel), UV disinfection, post-aeration, and discharge to Outfall 001. Former lago	on system (two, 72-acre
ponds) used for flow EQ and sludge wasting. 1. TREATMENT UNITS PROPERLY OPERATED:	Øs □m □u □na □ne
TREATMENT UNITS PROPERLY MAINTAINED: <u>Blower and diffuse air system reported to be scheduled for maintenance.</u>	OS MM OU ONA ONE
STANDBY POWER OR OTHER EQUIVALENT PROVIDED: Two generators onsite.	Øs □m □u □na □ne
ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs □m □u □na □ne
ALL NEEDED TREATMENT UNITS IN SERVICE: One aeration basin down due to diffuse air system and one clarifier down due	ma .
to design. 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: One Class III and one Class I; additional personnel from wat	OS MM DU DNA DNE
department.	— MIS LIM LIU LINA LINE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	□S □M □U □NA ØNE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	□y □n □na ☑ne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	□Y □N □NA ☑NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: Former lagoon system can be used.	☑Y □N □NA □NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	□Y ☑N □NA □NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	□y □n ☑na □ne
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	□y □n ☑na □ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□Y ☑N □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ☑NA □NE
1	

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS: Operator collects/analyzes flow, DO, and pH; contract labs for other parameter	<u>rs.</u>
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	⊠y □n □na □ne
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y □N □NA □NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y □N □NA □NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT: Conduct additional sampling for WE water quality.	T testing
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT: Ar, Total Recoverable required for one only.	year ☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	Øy □n □na □ne
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y □N □NA □NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y □N □NA □NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□Y □N ☑NA □NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: Yes TYPE OF DEVICE: 12" Parsh	all flume ☑Y ☐N ☐NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y □N □NA □NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: Greyline SL (totalizer)	^{T32}
4. CALIBRATION FREQUENCY ADEQUATE: Last calibrated Aug 30, 2020.	☑Y □N □NA □NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y □N □NA □NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: Secondary meter is located in office and not read available for accuracy check at primary device.	ily □n □na ☑ne
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y □N □NA □NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y □N □NA □NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS: Operator collects/analyzes flow, DO, and pH; contract labs for other parameter	ers.
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☑Y □N □NA □NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	□Y □N ☑NA □NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	Øy □n □na □ne
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y □N □NA □NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE
7. COMMERCIAL LABORATORY USED:	Øy □n □na □ne
a. LAB NAME: Environmental Services Co, Inc.	er and Associates, Inc.
b. LAB ADDRESS: 13715 West Markham, Little Rock, AR 72211 1156	North Bonnie Brae, Denton, TX 76201
c. PARAMETERS PERFORMED: CBOD5, TSS, NH3-N, FCB, TP, NO3+NO2-N, Cu (Total Recoverable), and Ar (Total Recovera	<u> </u>
8. BIOMONITORING PROCEDURES ADEQUATE:	ØY □N □NA □NE
a. PROPER ORGANISMS USED:	ØY □N □NA □NE
b. PROPER DILUTION SERIES FOLLOWED:	Øy □n □na □ne
c. PROPER TEST METHODS AND DURATION:	ØY □N □NA □NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	□Y □N ☑NA □NE

	: EFFLUENT/R				1111. 02-00070, 1 0	7						
BASED ON	N VISUAL OBS	ERVATIONS (ONLY			ØS □M □	IU □NA □NE					
	Viewed at Outfa											
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS COLOR OTHER							
001	NO	NO	NO	NOT	NO	CLEAR						
				PERSISTENT								
			l		1							
SECTION H	I: SLUDGE DIS	POSAL										
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	TS		ØS DM D	IU □NA □NE					
DETAILS:	Sludge is waste	ed to former lag	goon system or	nsite.	l							
-	IANAGEMENT ADEQU					⊠s □m	□u □na □ne					
2. SLUDGE R	ECORDS MAINTAINED	O AS REQUIRED BY 4	0 CFR 503:			□s □м	□u ☑na □ne					
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PU	BLIC CONTACT SITE): N	<u>/A</u>						
SECTION I:	SAMPLING IN	SPECTION PRO	OCEDURES									
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		□S □M □	IU ⊠NA □NE					
DETAILS:												
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				□Y	□N ☑NA □NE					
2. TYPE OF S	SAMPLE: GRAB:	□COMPOSITE: I	METHOD: FREQUE	ENCY:								
3. SAMPLES	PRESERVED:					□Y	□N ☑NA □NE					
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□Y	□N ☑NA □NE					
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	/ICE:				□Y □N ☑NA □NE					
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				□N ☑NA □NE					
7. SAMPLE S	PLIT WITH PERMITTEI	E:					□N ☑NA □NE					
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					□N ☑NA □NE					
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IIT:			□Υ	□n Øna □ne					
	: STORM WATI											
	ATER MANAG						IU □NA □NE					
				ater protection;	inspected under							
	PDATED AS NEEDED:_						□N ☑NA □NE					
	INCLUDING ALL DISCH		CE WATERS:				□N ☑NA □NE					
	N PREVENTION TEAM		<u> </u>				ON MA ONE					
	N PREVENTION TEAM): 				□N ☑NA □NE					
	OTENTIAL POLLUTANT		DIFAKC.				ON MA ONE					
	DTENTIAL SOURCES A						ON MA ONE					
	STORM WATER DISCH	IARGES ARE AUTHOR	KIZEU:				□N ☑NA □NE					
	RUCTURAL BMPS:	ne.					□N ☑NA □NE					
	ON-STRUCTURAL BMF						ON MA ONE					
	OPERLY OPERATED AS						□N ☑NA □NE □N ☑NA □NE					
II. INSPECTIO	ONS CONDUCTED AS	NEWUIKED:				⊔Y	LIN LINA LINE					

DMR Calculation Check

Reporting Period:	From	2019	04	01	_ 10 _	2019	04	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		TSS	_					
	Ma	Loading	w)			Concer (mg		
		Mon. Avg.	y)	Мо	n. Avg		7-Day <i>i</i>	Avg.
Reported Value:		83.2			4.3		7.9)
Calculated Value:		83.2			4.3		7.9)

20.0

If calculated value does not equal reported value, explain: Values are the same. See Table 1 for calculations.

353.6

Permit Value:

30.0

DMR Calculation Check

Reporting Period:	From	2019	04	01	То	2019	04	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		FCB	-					
	Ma	Loading Iss (lbs/day	()			Concer		
	-	Mon. Avg.		Мо	n. Avg	J.	7-Day	Avg.
Reported Value:		N/A			17		184	1
Calculated Value:		N/A			17		93	
Permit Value:		N/A		1	1000		200	0

If calculated value does not equal reported value, explain:

Values are not the same; cannot duplicate results. See Table 2 for calculations.

Inspection Report: Forrest City Wastewater Treatment Plant, AFIN: 62-00070, Permit #: AR0020087

Office of Water Quality Photographic Evidence Sheet										
Location: Forrest City Wastewater Treatment Plant										
Photograp	Photographer: Kerri McCabe Date: Sept 22, 2020 Time: 1016									
Witness:	Witness: Photo #: 1									
Description	n: A	Automatic bar screen at he	eadworks.							



Photographer: Kerri McCabe Date: Sept 22, 2020 Time: 1016
Witness: Photo #: 2





Inspection Report: Forrest City Wastewater Treatment Plant, AFIN: 62-00070, Permit #: AR0020087

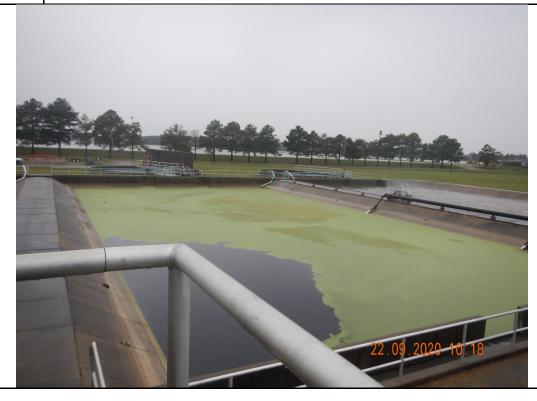
Office of Water Quality Photographic Evidence Sheet										
Location: Forrest City Wastewater Treatment Plant										
Photograph	Photographer: Kerri McCabe Date: Sept 22, 2020 Time: 1018									
Witness: Photo #: 3										



Photographe	r: Kerri	McCab	е			ate:	Sept 22	2, 2020)	Time:	1	1018
Witness:										Photo #	# :	4
				_							_	

Description:

Aeration Basins #2-3 for activated sludge; diffuse air system does not work for AB #2.

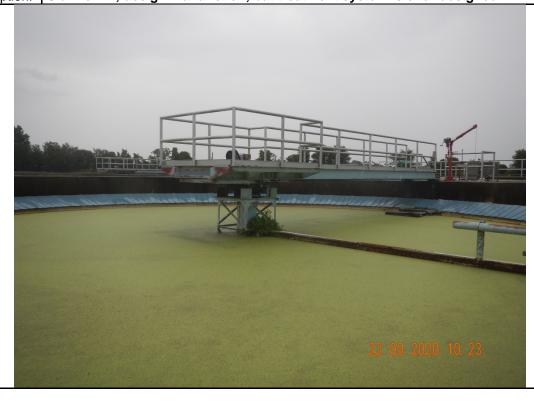


Office of Water Quality Photographic Evidence Sheet Location: Forrest City Wastewater Treatment Plant Photographer: Kerri McCabe Date: Sept 22, 2020 Time: 1022 Witness: Photo #: 5



Photographe	er: Kerri McCabe	Date:	Sept 22, 2020	Time:	1023
Witness:				Photo #:	6

Description: Clarifier #2; design malfunction, but treatment system is over-designed.



Office of Water Quality Photographic Evidence Sheet						
Location:	Location: Forrest City Wastewater Treatment Plant					
Photograp	Photographer: Kerri McCabe Date: Sept 22, 2020 Time: 1024					
Witness:	Witness: Photo #: 7					
Description	n: Clarifier #3					



Photogra	oher: Kerri McCabe	Date:	Sept 22, 2020	Time:	1028
Witness:				Photo #:	8

Description: Rapid sand filters; not in use



Office of Water Quality Photographic Evidence Sheet Location: Forrest City Wastewater Treatment Plant Photographer: Kerri McCabe Date: Sept 22, 2020 Time: 1030 Witness: Photo #: 9

Description: **UV disinfection**



Photographer:	Kerri McCabe	Date:	Sept 22, 2020	Time:	1028
Witness:				Photo #:	10

Description: Post-aeration; oxygen charger (center) and step cascade (left)



Office of Water Quality Photographic Evidence Sheet Location: Forrest City Wastewater Treatment Plant Photographer: Kerri McCabe Date: Sept 22, 2020 Time: 1032 Witness: Photo #: 11

Description: Primary/secondary flow measurement



F	hotographer	Kerri McCabe	Date:	Sept 22, 2020	Time:	1034
٧	Vitness:				Photo #:	12

Description: Outfall 001 at receiving stream



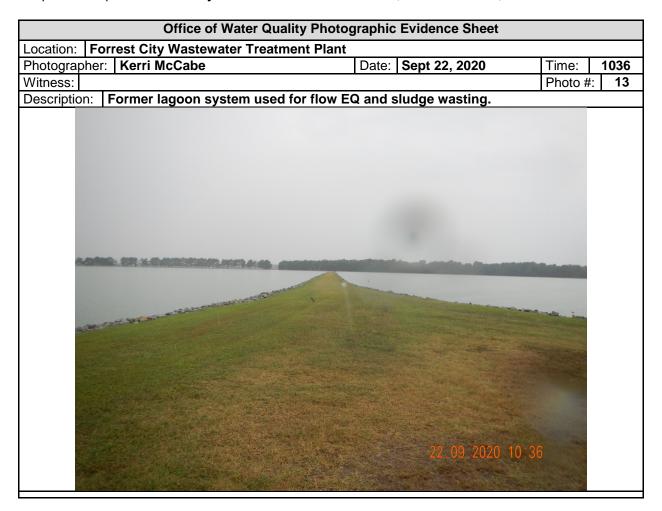


Figure 1. Google Earth image dated June 7, 2106 depicting City of Forrest City POTW with major components identified.



Table 1. TSS for City of Forrest City for April 2019.

Apr-19				
TSS (three/week)				
Day	Concentration (mg/l)	7-Day Average (mg/l)	Flow (MGD)	Loading (lbs/day)
1	2.50		1.616	33.69
3	2.50		1.651	34.42
4	5.80	3.60	1.758	85.04
8	2.50		3.517	73.33
10	2.50		2.379	49.60
11	2.50	2.50	2.139	44.60
15	2.80		3.140	73.33
17	2.60		2.236	48.49
18	6.20	3.87	2.770	143.23
22	18.80		2.382	373.48
24	2.50		1.928	40.20
25	2.50	7.93	2.001	41.72
29	2.50		1.940	40.45
Monthly Average	4.32			83.20

Table 2. FCB for City of Forrest City for April 2019.

Apr-19				
FCB (three/week)				
Day	Count	Log	Average	Geo Mean
1	10	1.00		
3	21	1.32		
4	7	0.87	1.06	11.5828919429942
8	235	2.37		
10	4	0.60		
11	6	0.80	1.26	18.0921203352057
15	12	1.08		
17	344	2.54		
18	195	2.29	1.97	93.0232338759638
22	1	0.00		
24	12	1.08		
25	10	0.98	0.69	4.87924022929371
29	10	0.98	0.98	9.6000000000000
Average		1.22		
Geo Mean		16.76433278681830		