ARKANSAS
ENERGY & ENVIRONMENT

September 14, 2021

Mr. Monty Ledbetter, Utilities Director
City of Hot Springs POTW
780 Adams Street
Hot Springs, AR 71901

RE: City of Hot Springs POTW Inspections (Garland Co)
AFIN: 26-00145 NPDES Permit No.: AR0033880
ARR000059

Dear Mr. Ledbetter:

On June 23, 2021, I performed a Compliance Evaluation Inspection, an SSO/Collection System Inspection, and 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.

Please refer to the "Summary of Findings" section of each of the inspection reports and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e., photos) is due by **September 29, 2021**.

If I can be of any assistance please contact me at harmont@adeq.state.ar.us or (501) 837-2070.

Sincerely,

Travis Harmon

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

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **26-00145**	PERMIT #: **AR0033880**	DATE: **6/23/2021**
COUNTY: **26 Garland**	PDS #: **117419**	MEDIA: **WN**
GPS LAT: **34.450316** LONG: **-93.019033** LOCATION: **General Area**		

FACILITY INFORMATION

NAME:
City of Hot Springs POTW
LOCATION:
320 Davidson Drive
CITY:
Hot Springs, AR 71901

RESPONSIBLE OFFICIAL

NAME: / TITLE
Mr. Monty Ledbetter / Utilities Director
COMPANY:
City of Hot Springs POTW
MAILING ADDRESS:
780 Adams Street
CITY, STATE, ZIP:
Hot Springs AR 71901
PHONE & EXT: / FAX:
501-651-7730 /
EMAIL:
mledbetter@cityhs.net
hmauldin@cityhs.net
gyates@cityhs.net

CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE:	INSPECTOR ID#:
1 - Municipal	**34689 S - State**

FACILITY EVALUATION RATING:	INSPECTION TYPE:
2 - Marginal	**Compliance Evaluation**

DATE(S):	ENTRY TIME:	EXIT TIME:	PERMIT EFFECTIVE DATE:
6/23/2021	**10:00**	**15:00**	**9/1/2018**
			PERMIT EXPIRATION DATE: **8/31/2023**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Gordon Yates/ Operator
Ronnie Mann/ Operator
501-262-1125

AREA EVALUATIONS

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

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

SUMMARY OF FINDINGS

1. **The facility has reported exceedances in April and May 2021. These are violations of Part 1.A of the permit. Exceedances include TSS & CBOD in May and TSS, TP, & CBOD in April. Additionally, 12 exceedances were reported from January 2021 through March 2021. The facility has properly reported these exceedances in monthly DMR and no inspection response is required for this item.**

2. **I photographed excessive algae and vegetative growth in the secondary clarifiers and sand filters at the time of inspection. This is a violation of Part III.B.1.A of the permit. The facility is overloaded and currently a new filter system is being installed. Per operators, they need the new filter system on-line prior to washing down excess algae, which would disrupt treatment.**

3. **The effluent flowmeter was last calibrated on March 9, 2020. This is a violation of Part III.C.2 of the permit. The Division requires an annual calibration of the effluent flowmeter, conducted by a qualified technician.**

GENERAL COMMENTS

Introduction

I inspected on June 23, 2021. The inspection was scheduled. Mr. Gordon Yates and Mr. Ronnie Mann, Operators, represented the facility during the inspection. In addition, Ms. Amanda Cates, Lab Supervisor, represented the on-site lab. Hot Springs operates a POTW designed to treat 12 MGD.

Records Review

Enforcement Branch conducted a DMR review from January 2021 through March 2021, which showed 12 exceedances during this time period. I also reviewed DMR for April and May 2021 and found seven additional exceedances. The facility provided all sample results for April 2021 to check DMR averaging and load calculations. The plant is exceeding design capacity and a new filter system is under construction. I also reviewed quarterly biomonitoring DMR from the 2nd Quarter 2020 through the 1st Quarter 2021. I used a TSS questionnaire at the lab. The lab answered all questions pertaining to the questionnaire. I also photographed a lab bench sheet to check TSS calculations.

Treatment Plant Inspection

I inspected the treatment plant form influent to final effluent. I started at the headworks and photographed the two bar screens and grit removal. I then photographed the equalization basin. The plant was pumping basin wastewater to the plant at the time. The plant consists of three primary clarifiers, three trains of aeration each with a sludge basin, followed by four secondary clarifiers. The plant then treats with sand filtration; however, a new filter system is currently under construction. Effluent is then disinfected with UV light. During the inspection, I photographed the effluent flowmeter, which was last calibrated March 9, 2020. I viewed the final effluent as collected in the composite sample bottle.

INSPECTOR'S SIGNATURE: Travis Harmon	**Travis Harmon**	DATE: **7/8/2021**
SUPERVISOR'S SIGNATURE: Kerri McCabe	**Kerri McCabe**	DATE: **9/13/2021**

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑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:	
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:	
1. TREATMENT UNITS PROPERLY OPERATED:	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED: **Excess algae in clarifiers and sand filters**	☐S ☑M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
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:	☑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

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
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:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐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:__ TYPE OF DEVICE: **4 ft. Parshall is covered**	☐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: **Teledyne ISCO**	☐Y ☑N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE: **Last calibrated by qualified technician on March 9, 2020**	☐Y ☑N ☐NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE: **Effluent channel covered**	☐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: **Used TSS questionnaire and checked TSS for bench sheet calculation (Method 2540 D).**	
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:	☑Y ☐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:	☐Y ☑N ☐NA ☐NE
a. LAB NAME: **City of Hot Springs**	
b. LAB ADDRESS: **320 Davidson Drive, Hot Springs, AR 71901**	
c. PARAMETERS PERFORMED: **CBOD5, TSS, NH3-N, DO, FCB, TP**	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:	☑Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:	☑Y ☐N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION:	☑Y ☐N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☑Y ☐N ☐NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY — ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **Viewed effluent collected in sample bottle.**

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	none	none	none	none	none	clear	--

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS — ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **Belt press and taken to compost facility (permitted under ARR000166).**

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☑S ☐M ☐U ☐NA ☐NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS — ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☐N ☑NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☑NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☑NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☑NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☑NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☑NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☑NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☑NA ☐NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS — ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **No-Exposure inspection conducted per ARR000059; no violations of No-Exposure Exclusion.**

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☑NA ☐NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☑NA ☐NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☑NA ☐NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☑NA ☐NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☑NA ☐NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☑NA ☐NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☑Y ☐N ☐NA ☐NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☑NA ☐NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☑NA ☐NE

DMR Calculation Check

Reporting Period:	**From**	**2021** (Year)	**04** (Month)	**01** (Day)	**To**	**2021** (Year)	**04** (Month)	**30** (Day)

Parameter Checked: **TP**

	Loading	**Concentration**	
	Mass	**Monthly**	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	**159**	**1.45**	**2.13**
Calculated Value:	**159.1**	**1.45**	**2.13**
Permit Value:	**100.1**	**Report**	**Report**

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period: **From** **2021** (Year) **04** (Month) **01** (Day) **To** **2021** (Year) **04** (Month) **30** (Day)

Parameter Checked: **CBOD5**

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	**1502**	**13.15**	**17.54**
Calculated Value:	**1501.6**	**13.154**	**17.537**
Permit Value:	**1500**	**10**	**15**

If calculated value does not equal reported value, explain:

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1036**
Witness:	**None- no other regulatory personnel**			Photo #:	**1**
Description:	**Plant influent at headworks with influent from EQ basin from left.**				

Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1037**
Witness:	**None**			Photo #:	**2**
Description:	**Influent screening.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1032**
Witness:	**None**			Photo #:	**3**
Description:	**Grit removal.**				

Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1041**
Witness:	**None**			Photo #:	**4**
Description:	**EQ Basin.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1050**
Witness:	**None**			Photo #:	**5**
Description:	**Facility has three primary clarifiers.**				

Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1054**
Witness:	**None**			Photo #:	**6**
Description:	**Three trains of aeration with sludge basin for RAS.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1054**
Witness:	**None**			Photo #:	**7**
Description:	**View of three aeration basins.**				

Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1104**
Witness:	**None**			Photo #:	**8**
Description:	**Excess algae in four secondary clarifiers.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1106**
Witness:	**None**			Photo #:	**9**
Description:	**Vegetation needing removal at secondary clarifiers.**				

Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1110**
Witness:	**None**			Photo #:	**10**
Description:	**Excess algae in sand filters.**				

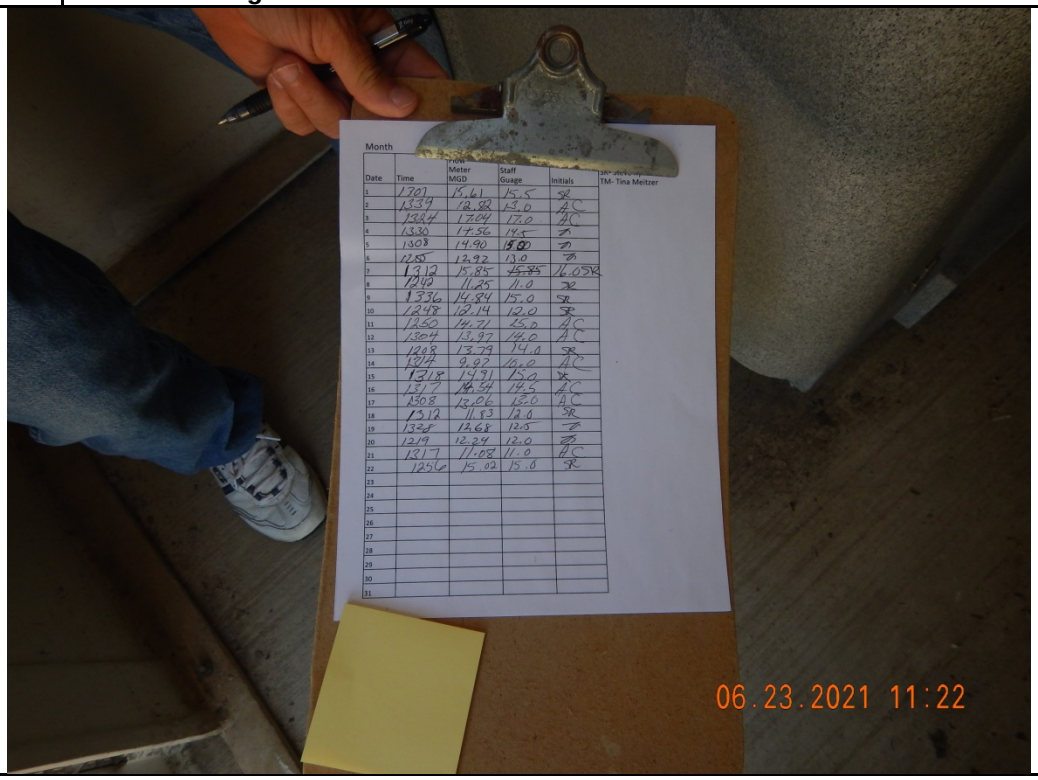
Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1115**
Witness:	**None**			Photo #:	**11**
Description:	**Sludge belt press.**				

Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1117**
Witness:	**None**			Photo #:	**12**
Description:	**New filter system being installed.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1118**
Witness:	**None**			Photo #:	**13**
Description:	**UV disinfection.**				

Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1124**
Witness:	**None**			Photo #:	**14**
Description:	**View of final effluent as collected in composite sampler.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1122**
Witness:	**None**			Photo #:	**15**
Description:	**Flow check log sheet.**				



Photographer:	**Travis Harmon**	Date:	**6/23/2021**	Time:	**1125**
Witness:	**None**			Photo #:	**16**
Description:	**Effluent flowmeter last calibrated March 20, 2020.**				

Figure 1. Google Earth image of City of Hot Springs POTW.

CITY OF HOT SPRINGS

Utilities Department

780 Adams Street

Hot Springs, Arkansas 71901

September 23, 2021

Mr. Travis Harmon, Inspector
Arkansas Energy & Environment
Office of Water Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: Response to Letter of September 14, 2021 Regarding June 23, 2021 Compliance Evaluation Inspection - City of Hot Springs POTW Inspections (Garland County) - AFIN: 26-00145 NPDES Permit No.: AR0033880 / ARR000059

Dear Mr. Harmon,

On June 23, 2021 a Compliance Evaluation Inspection and Industrial Stormwater Inspection took place for NPDES Permit No. AR0033880 and Industrial Stormwater Permit No. ARR000059. In the Summary of Findings, the Inspection Report calls for responses to the following issues at the Davidson Drive Wastewater Treatment Plant.

Finding: Excessive algae and vegetative growth in were present in secondary clarifiers and sand filters.

Response: On July 19, 2021 Plant Operators removed the excessive algae and plant growth from the secondary treatment and sand filters.

Finding: Calibration of the effluent flowmeter (last calibrated on March 9, 2020) was overdue for the required annual calibration.

Response: The effluent flowmeter has be calibrated as of July 22, 2021 by Paul Wofford with Instrument & Supply.

The June 23 Report also notes that four of six lift stations inspected had pumps out of service, including:

- Malvern Highway Pump Station
- Catherine Heights Pump Station
- Gulpha Pump Station
- Matthews Lane Pump Station

Response: Pump No. 2 at the Malvern Highway Pump Station had been rewound and is back in service.

Pump No. 3 at the Gulpha Pump Station has been rewound and is back in service.

Pump No. 1 at the Catherine Heights Pump Station has had the seals repaired and is back in service.

Pump No. 1 at the Matthews Lane pump station was repaired and reinstalled on June 24, 2021. Two pumps have been functioning at the station since that date.

If you need further information, please let us know. Harold Mauldin, Facilities Operations Manager for the Davidson Drive Wastewater Treatment Plant is available at 501.262.1125 or by email at hmauldin@cityhs.net. Jeff Palmer, Lift Station Manager is available at 501.321.2120 or by email at jpalmer@cityhs.net. I can be reached at 501.651.7730 or by email at mledbetter@cityhs.net.

Cordially,

Monty Ledbetter
Utilities Director

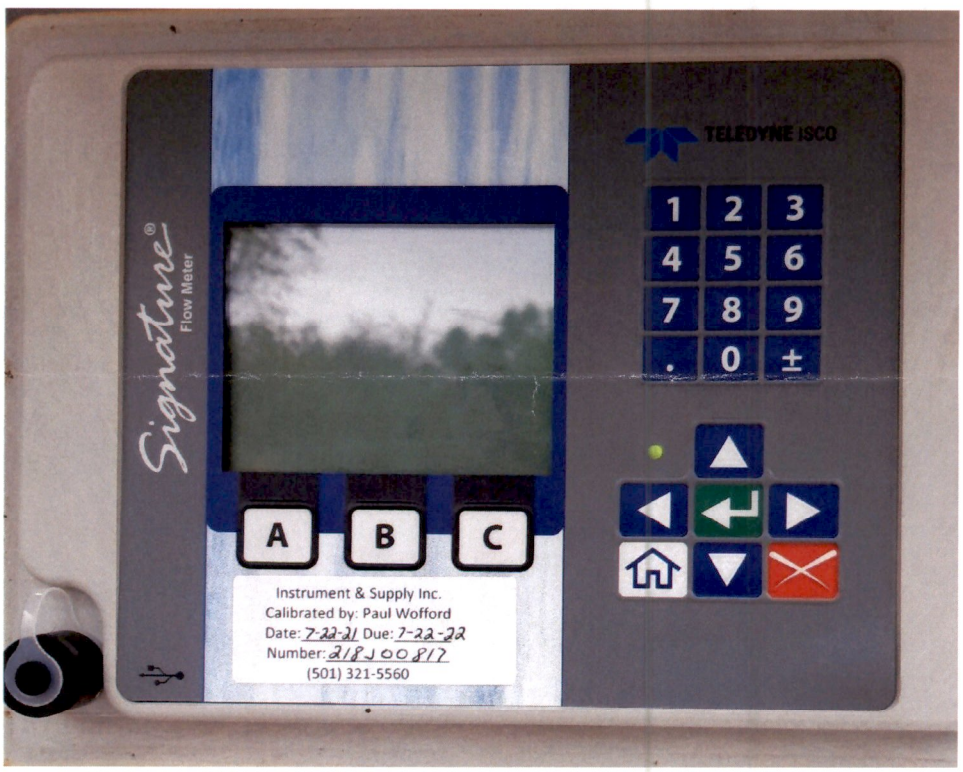
Cc: Bill Burrough, City Manager, City of Hot Springs
Bobby Harris, Field Operations Manager, City of Hot Springs Utilities
Harold Mauldin, Wastewater Facilities Operations Manager, City of Hot Springs Utilities
Jeff Palmer, Wastewater Lift Stations Manager, City of Hot Springs Utilities

Attachment: Davidson Drive Wastewater Treatment Plant Photos

Davidson Drive Wastewater Treatment Plant Photos

Davidson Drive Wastewater Treatment Plant Photos

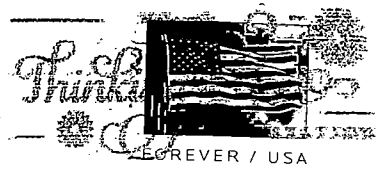
Clarifier after cleaning



Effluent Meter Calibration
July 22, 2021
Instrument & Supply
Paul Wofford

City of Hot Springs
Utilities Department
Post Office Box 700
Hot Springs National Park,
Arkansas 71902

LITTLE ROCK AR 720
27 SEP 2021 PM 4 L



Mr. Travis Harmon, Inspector
Arkansas Energy & Environment
Office of Water Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

72118-531799

ARKANSAS
ENERGY & ENVIRONMENT

October 13, 2021

Monty Ledbetter, Utilities Director
City of Hot Springs
780 Adams Street
Hot Springs, AR 71901

RE: City of Hot Springs POTW - Response to Inspections (Garland Co)
AFIN: 26-00145 NPDES Permit No.: AR0033880
ARR000059

Dear Mr. Ledbetter:

I have reviewed the response pertaining to my June 23, 2021 inspections of the City of Hot Springs - Davidson POTW. The information provided sufficiently addresses the items referenced in my inspection reports. At this time, the Department has no further comment concerning these particular inspections. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If I require further information concerning this matter, I will contact you. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 837-2070 or you may email me at harmont@adeq.state.ar.us.

Sincerely,

Travis Harmon

Travis Harmon
Inspector, DEQ - Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118