ARKANSAS
ENERGY & ENVIRONMENT

May 26, 2022

Kevin A. Smith, Mayor
City of Helena-West Helena
P.O. Box 248
Helena-West Helena, AR 72342
Via email to: mayor@helena-westhelena.us ; odonaby@hwhwater.com

RE: West Helena WWTP Inspections (Phillips Co)
AFIN: 54-00086 NPDES Permit No.: AR0022021
ARR000613

Dear Mayor Smith:

On March 22, 2022 I performed a Compliance Evaluation Inspection and an Industrial Stormwater (No-Exposure) 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 the attached inspection report and provide a written response for each violation that was noted. This case has been referred directly to the Office of Water Quality - Enforcement Branch for further review. City of Helen-West Helena should immediately initiate all actions necessary to resolve and correct the violations cited in the inspection report. Written notification of the corrective actions taken for the violations must be submitted within thirty (30) calendar days from receipt of this letter to the attention of Richard Healey, Office of Water Quality - Enforcement Branch Manager, at (501) 682-0640 or healeyr@adeq.state.ar.us. This written notification should include; but not limited to, photographs and/or copies of other documentation.

If I can be of any assistance, please contact Inspector Supervisor Kerri McCabe at mccabe@adeq.state.ar.us or (501) 352-5641.

Sincerely,

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

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **54-00086**	PERMIT #: **AR0022021**	DATE: **3/22/2022**
COUNTY: **54 Phillips**	PDS #: **120397**	MEDIA: **WN**
GPS LAT: **34.53352** LONG: **-90.671600** LOCATION: **Entrance**		

FACILITY INFORMATION

NAME:
West Helena WWTP
LOCATION:
Southwest of West Helena off of Old Little Rock Road in Phillips County, Arkansas
CITY:
Helena-West Helena

RESPONSIBLE OFFICIAL

NAME: / TITLE
Kevin A. Smith / Mayor
COMPANY:
City of Helena-West Helena
MAILING ADDRESS:
P.O. Box 248
CITY, STATE, ZIP:
Helena-West Helena AR 72342
PHONE & EXT: / FAX:
(870)753 8528 /
EMAIL:
mayor@helena-westhelena.us; odonaby@hwhwater.com

CONTACTED DURING INSPECTION: ***

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**	INSPECTOR ID#: **142556 S - State**
FACILITY EVALUATION RATING: **1 - Unsatisfactory**	INSPECTION TYPE: **Compliance Evaluation**

DATE(S):	ENTRY TIME:	EXIT TIME:	PERMIT EFFECTIVE DATE:	PERMIT EXPIRATION DATE:
3/22/2022	**13:30**	**14:00**	**2/1/2019**	**1/31/2024**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Operator did not accompany the inspection.

AREA EVALUATIONS

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

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

SUMMARY OF FINDINGS

1) **The following items violate Part III, Section B, 1, A of the permit:**
   - **The access road to the treatment facility is damaged and in need of repair.**
   - **There was inadequate freeboard in the lagoons at the time of the inspection.**
   - **Due to significant erosion from inadequate freeboard, there are sections of levees in need of repair in all three lagoons inspected.**
   - **Sections of the lagoon levees were not safely accessible by vehicle at the time of inspection.**

2) **The following items violate Part 1, Section A of the permit:**
   - **No flow was recorded for October 2021.**
   - **July 2021 is missing flow data.**
   - **All flow values reported for January, May, and July were the same number (2.2MGD).**
   - **No samples were collected in the month of October 2021.**

3) **The following item violates Part II, 10 of the permit:**
   - **Only two WET tests were conducted in 2021. Per the permit, WET testing frequency is once/quarter.**

4) **The following item violates Part III, Section C, 1 of the permit:**
   - **The sample data for the composite sampling are incomplete; there is no aliquot information to**

demonstrate the sample was collected per the definition of the composite (see Part IV).

5) **The following item violates Part III, Section C, 9, C of the permit:**
   - **The operator did not accompany the inspection beyond the entrance to the facility and subsequently did not provide access to sampling locations or either of the pump houses.**

GENERAL COMMENTS

SITE ASSESSMENT

The treatment system for Outfall 001 consists of a five-cell lagoon system.

The two lagoons south of Caney Creek were not accessible for inspection due to high water in the creek crossing.

The following issues were noted for the treatment system for Outfall 001:

- **The access road to the lagoons was damaged and in need of repair at the time of inspection. Water damage along a steep slope near the entrance prohibits safe entry and exit, particularly during wet weather. The facility must be accessible by vehicle for inspection and maintenance at all times.**
- **Some sections of the levees were not accessible by vehicle at the time of inspection. The lagoons must be accessible by vehicle for inspection and maintenance at all times.**
- **There is inadequate freeboard in the lagoons. Levels in all lagoons have caused significant erosion along the levees, and levels in Cell 2 were nearly over the levees at the time of inspection (Photos 9-13).**

City personnel did not provide access to the sampling locations or either of the pump houses during the inspection.

RECORDS

Records for January, May, July, and October of 2021 were requested and provided. Records were made available via email and are deemed organized and complete unless otherwise noted.

Only two samples were taken in July 2021, and no samples were taken in October 2021. Part 1, Section A of the permit requires a once/week sampling frequency for all parameters other than Total Phosphorus and Nitrate + Nitrite Nitrogen. Additionally, only two WET tests were performed in 2021. Part II, 10, A. of the permit requires a once/quarter WET testing frequency.

No flow was reported for the entire month of October 2021 and approximately two weeks of July 2021. It should be noted that all reported flow values for 2021 were the same (2.200 MGD).

Complete composite sample data were not provided on COC. There is no information regarding aliquot sampling intervals on the COC, and it cannot be demonstrated whether samples were collected proportional to flow or per the definition of "composite" in Part IV of the permit.

It is requested that the City of Helena-West Helena provide the sample and flow data from the previous three years to the Office of Water Quality – Enforcement Branch for review.

INSPECTOR'S SIGNATURE: Aaron Baggett **Aaron Baggett**	DATE: **4/22/2022**
SUPERVISOR'S SIGNATURE: Kerri McCabe **Kerri McCabe**	DATE: **5/26/2022**

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: **No aliquot information for composite samples.**	☐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:	☐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: **The city uses a contract lab for all sampling.**	
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: **Not evaluated due to thunderstorm during inspection. Primary flow measurement is 3' rectangular weir; secondary measurement is Siemens Hydro Ranger 200.**	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:__ TYPE OF DEVICE:	☐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:	☐Y ☐N ☐NA ☑NE
4. CALIBRATION FREQUENCY ADEQUATE:	☐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:	☐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: **The city uses a contract lab for all sampling.**	
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:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
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: **Could not access final treatment lagoons due to weather; operator did not provide access to pump stations where effluent is sampled.**

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001							--

SECTION H: SLUDGE DISPOSAL

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

DETAILS: **Sludge is retained in lagoon.**

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): **N/A**

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: **Inspected under IGP ARR000613.**

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) **01** (Month) **01** (Day) To **2021** (Year) **01** (Month) **31** (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:	**181.2**	**9.9**	**15.2**
Calculated Value:	**181.2**	**9.88**	**15.19**
Permit Value:	**250.2**	**25.0**	**40.0**

If calculated value does not equal reported value, explain: **Minor differences due to rounding.**

DATE	CONCENTRATION (mg/l)	MGD	MASS(lbs/day)	7-DAY AVERAGE (mg/l)
8	5.1	2.2	93.5748	5.1
15	7.48	2.2	137.24304	7.48
19	15.19	2.2	278.70612	15.19
26	11.74	2.2	215.40552	11.74
MONTHLY AVG	**9.8775**	**2.2**	**181.23237**	

DMR Calculation Check

Reporting Period: From **2021** (Year) **05** (Month) **01** (Day) To **2021** (Year) **05** (Month) **31** (Day)

Parameter Checked: **Ammonia**

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	**0.2**	**4.3**	**0.4**
Calculated Value:	**4.27**	**0.23**	**0.35**
Permit Value:	**150.1**	**15.0**	**22.5**

If calculated value does not equal reported value, explain:
Minor differences due to rounding. Monthly averages for concentration and loading appear to have been swapped when permittee submitted DMR; both of the correctly calculated values were under the corresponding permit limits.

DATE	CONCENTRATION (mg/l)	MGD	MASS(lbs/day)	7-DAY AVERAGE (mg/l)
4	0.35	2.2	6.4218	0.35
11	0.26	2.2	4.77048	0.26
18	0.2	2.2	3.6696	0.2
25	0.12	2.2	2.20176	0.12
MONTHLY AVG	**0.2325**	**2.2**	**4.26591**	

Office of Water Quality Photographic Evidence Sheet					
Location:	**West Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1333**
Witness:	**Kerri McCabe**			Photo #:	**1**
Description:	**Entrance to lagoons, facing approximately west.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1333**
Witness:	**Kerri McCabe**			Photo #:	**2**
Description:	**Influent pump house at entrance of lagoons.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**West Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1333**
Witness:	**Kerri McCabe**			Photo #:	**3**
Description:	**Effluent pump house in background of photo taken from entrance, facing south.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1336**
Witness:	**Kerri McCabe**			Photo #:	**4**
Description:	**Overview of Cell 1, facing west.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**West Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1338**
Witness:	**Kerri McCabe**			Photo #:	**5**
Description:	**Levee running between Cell 1 and Cells 2 and 3; levee is significantly eroded and in need of maintenance, facing north.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1338**
Witness:	**Kerri McCabe**			Photo #:	**6**
Description:	**Location of flow between Cell 1 and Cell 2 at southwest corner of Cell 1; note the lack of freeboard in the levee, facing northeast.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**West Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1338**
Witness:	**Kerri McCabe**			Photo #:	**7**
Description:	**At southwestern corner of Cell 1; note lack of freeboard in levee, facing approximately east.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1338**
Witness:	**Kerri McCabe**			Photo #:	**8**
Description:	**At southeast corner of Cell 3, facing west.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**West Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1338**
Witness:	**Kerri McCabe**			Photo #:	**9**
Description:	**Photo taken at south end of levee between Cell 1 and Cells 2 and 3; note lack of freeboard and levee erosion in Cell 3 (left of photo), facing north.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1341**
Witness:	**Kerri McCabe**			Photo #:	**10**
Description:	**Photo taken at north end of levee separating Cell 1 and Cells 2 and 3; note lack of freeboard on both sides of the levee, facing south.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**West Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1342**
Witness:	**Kerri McCabe**			Photo #:	**11**
Description:	**Significant erosion due to lack of freeboard at northeastern corner of Cell 2, facing south.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1342**
Witness:	**Kerri McCabe**			Photo #:	**12**
Description:	**Water levels near the top of levee at northeast corner of Cell 2.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**West Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1341**
Witness:	**Kerri McCabe**			Photo #:	**13**
Description:	**From northeast corner of Cell 2; water levels are nearly at the top of the levee, facing west.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1342**
Witness:	**Kerri McCabe**			Photo #:	**14**
Description:	**Another perspective of Cell 2 levels at its northernmost levee, facing west.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**West Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1345**
Witness:	**Kerri McCabe**			Photo #:	**15**
Description:	**Effluent pump house leading to Outfall 001.**				

Figure 1. Google Earth image depicting overview of West Helena WWTP location and Outfall001; satellite base imagery dated 11/11/2020.

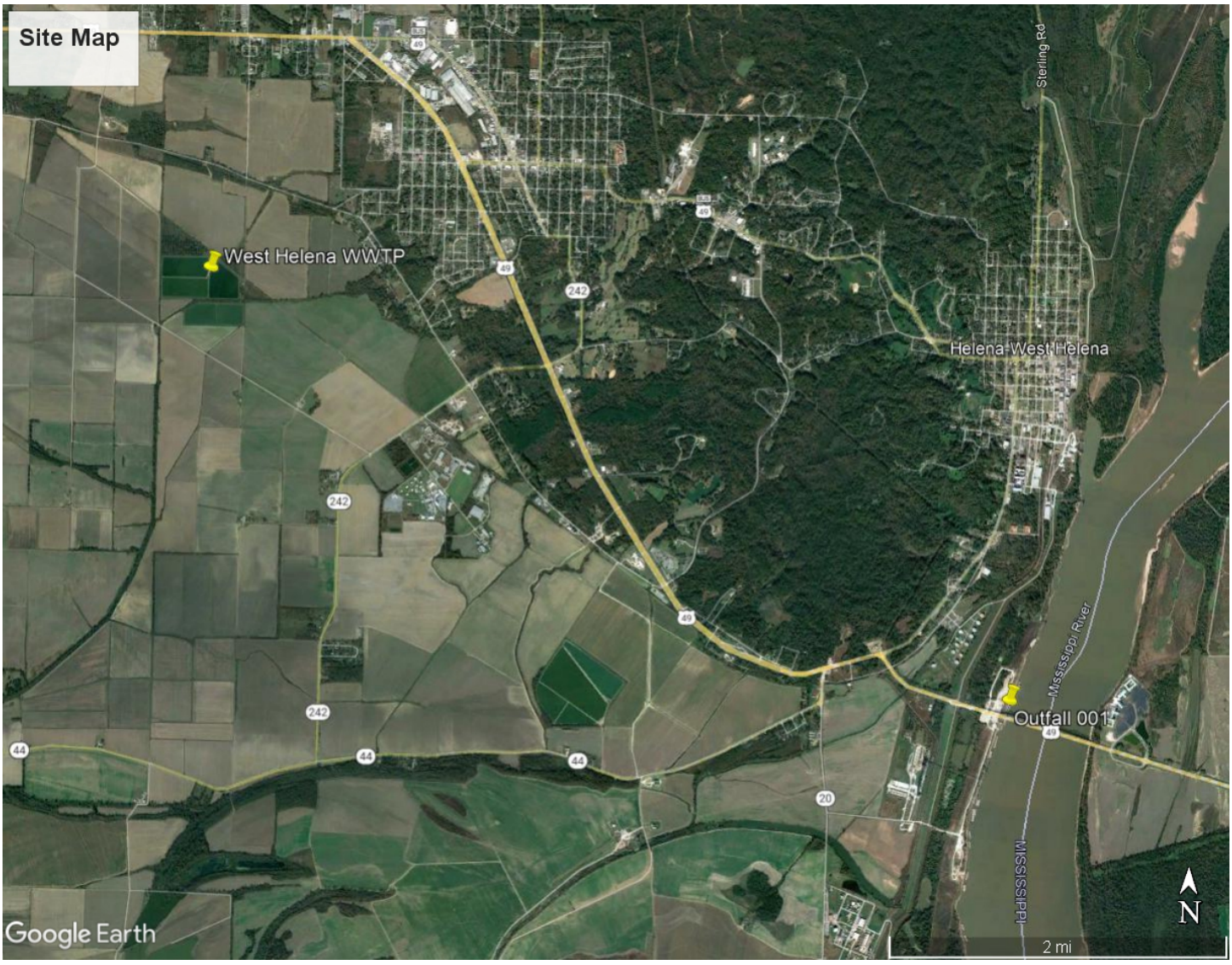

Figure 2. Google Earth image depicting West Helena WWTP components and simplified flow path; satellite base imagery dated 11/11/2020.