



August 8, 2022

Catherine Cook, City Manager City of Hope PO Box 667 Hope, AR 71802 Via email to: <u>citymanager@hopearkansas.net</u>; <u>wwlab@hopearkansas.net</u>

RE: City of Hope - Bois D'Arc (West Plant) Inspection (Hempstead Co) AFIN: 29-00034 NPDES Permit No.: AR0038466

Dear Ms. Cook:

On June 16, 2022, I performed a Compliance Evaluation 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.

Please refer to the "Summary of Findings" section of the inspection report 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 <u>Water-Inspection-Report@adeq.state.ar.us</u>. 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 <u>August 26, 2022</u>.

If I can be of any assistance, please contact me at <u>youngm@adeq.state.ar.us</u> or (501) 837-2073.

Sincerely,

Ming

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

ENVIRONMENTAL		OFFICE OF WATER QUALITY INSPECTION REPORT							
	QUALITY	AFIN: 29-00034 PERMIT #: AR003846		3466		DATE:	6/16/2022		
The ENVIRONME		COUNTY: 29 Hemp		mp	stead	PDS #: 121267			MEDIA: WN
		GF	S LAT: 33.655	5992	2 LONG: -93.641	597 L	OCATION:	Entrance	9
	CILITY INFORMAT	ION			INSPECTION INFORMATION				
NAME: City of Hope - Boi LOCATION:	is D'Arc (West Plar	nt)			FACILITY TYPE: 1 - Municipal		531 S - Stat		
	ile south on CR 38	1			FACILITY EVALUATION RATING: INSPECTION TYPE: 2 - Marginal Compliance Evaluation				
Hope, AR				Ī		NTRY TIME:	EXIT TIME: 12:59		FFECTIVE DATE:
RE	SPONSIBLE OFFIC	CIAL	-		0/10/2022 1	0.50	12.55	2/1/20 PERMIT E)20 XPIRATION DATE:
NAME: / TITLE	Oite Manager							1/31/2	2025
Catherine Cook /	City Manager			-	FAYETTEVILLE	SHAL	E RELATE	D: N	
City of Hope				-	FAYETTEVILLE SHALE VIOLATIONS: N				
MAILING ADDRESS: PO Box 667					INSPECTION PARTICIPANTS				
CITY, STATE, ZIP:					NAME/TITLE/PHONE/FAX/EMAIL/ETC.:				
Hope AR 71802					Scott Ross/WW Supervisor (Lic. #006359)/870-777- 8644/wwlab@hopearkansas.net				
870-777-6701	/ 870-722-2511				Kalyn Provence/Operator and Lab Tech (Lic. #013431)				
EMAIL:					Trey Butler/DE				
citymanager@ho							•		
CONTACTED DUP	RING INSPECTION	NO							
	(S=S	atisfac			LUATIONS sfactory, N=Not Applicable	/Evaluated	D		
S PERMIT		S	FLOW MEAS			S	STORMW	/ATER	
S RECORDS/RE	PORTS	S	LABORATOF			S	FACILITY	SITE RE	VIEW
	& MAINTENANCE	S	EFFLUENT/F	REC	EIVING WATER	S	SELF-MO	NITORIN	IG PROGRAM
S SAMPLING		S	SLUDGE HA	ND	LING/DISPOSAL	S	PRETRE	ATMENT	
** OTHER:									
					F FINDINGS				
	freeboard for the I		-		•		•		
	ards" adopted by R	_		B of	the APC&EC. S	Specifi	cally, Citat	ion 93.41	5 of "2014
Recommended St	ecommended Standards for Wastewater Facilities."								

2.) Sanitary waste was observed at the end of the levee spillway and in the drainage ditch from overflows occurring in the holding basin (see Photos 9-12). This is a violation of permit condition Part II. (6.). This is a <u>REPEAT</u> violation.

3.) At the time of inspection, the rapid sand filter system was not in operation (see Photos 21-22). This is a violation of permit condition Part III. (B.) (1.) (A.).

GENERAL COMMENTS

On June 16, 2022, I performed an inspection at City of Hope Bois D'Arc Wastewater Treatment Plant (WWTP) with the above participants in attendance. Bois D'Arc WWTP has a design consisting of a bar screen and grit removal system followed by flow equalization in a 4-acre stabilization basin (also used for sludge storage), activated sludge, clarification, intermittent sand filters, rapid sand filters, and disinfection by UV light (see Figure 1). This facility also has aerobic digestion and sludge drying beds for the activated sludge units. Bois D'Arc conducts analysis on a majority of the parameters in Part IA in an internal laboratory. This inspection consisted of a facility evaluation only. A records review was conducted by OWQ - Enforcement Branch.

Facility Evaluation:

My inspection started at the bar screen and grit removal area, where influent wastewater enters the Bois D'Arc WWTP. There are two bar screens one being manual and the other is automatic (see Photos 1-2). Following the bar screen, there is a valve that allows flow to enter the equalization basin during high flows (see Photo 3). At the time of inspection, the container for grit screenings was very full, but any of the materials would enter back in the headworks if spilled. Scott Ross, Wastewater Supervisor, stated that the container was being removed and replaced with an empty one in the next few hours (see Photo 4). Influent flow measurements are obtained for process control at a weir (see Photo 5), and wastewater is sent to the activated sludge units at a pumping location (see Photo 6). At the equalization basin, I observed the water level to be extremely high and there was not the required 2' of freeboard (see Photos 7-8). Mr. Ross stated there was a recent storm event that added an influx of wastewater to the basin. There is a concreted spillway at the pond that showed signs of a recent discharge (see Photo 9). I observed sanitary items and other trash on the rocks at the spillway and a small amount of green water in a hole (see Photos 10-12). After the equalization basin, we observed the activated sludge units that are run in parallel and there were no issues observed with either of the units (see Photos 13-20). At the rapid sand filter system, I observed an abundance of plants and the rapid sand filter was not in operation (see Photos 21-22). Mr. Ross state that the heavy snowfall in 2021 caused damage to the rapid sand filter and there were repairs being negotiated by the distributor of the unit. In the time of outage, the intermittent sand filters were being utilized when needed. Flow is measured through a Parshall flume prior to UV treatment (see Photo 23-24) and I talked with Mr. Ross about how the meter is calibrated. Mr. Ross stated that flow checks are completed frequently and supplied documentation of the flow checks (see Photo 27). UV disinfection was in operation (see Photo 25), and after disinfection is the sampling location and some postaeration (see Photo 26). There were no operational issues at the time of inspection.

I informed Mr. Ross that all discharges from the equalization basin must be reported to Enforcement Branch within 24 hours of knowledge of the discharge; and after the discharge is complete, the sanitary items need to be collected and the area disinfected. Following the inspection, Mr. Ross supplied photos of the water level of the equalization basin to show that the 2' freeboard was being maintained.

Miller	
INSPECTOR'S SIGNATURE: Michael Young	DATE: 7/25/2022
Kerri MS Cale	
SUPERVISOR'S SIGNATURE:Kerri McCabe	DATE: 8/5/2022

Inspection Report: City of Hope - Bois D'Arc (Wes, AFIN: 29-00034, Permit #: AR0038466

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	Øy 🗆n 🗆na 🗆ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS Discharges occurring from equalization basin during rain events.	
DETAILS: <u>Discharges occurring from equalization basin during rain events.</u> 1. TREATMENT UNITS PROPERLY OPERATED:	
1. TREATMENT UNITS PROPERLY OPERATED:	
1. TREATMENT UNITS PROPERLY OPERATED: 2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🗇ne
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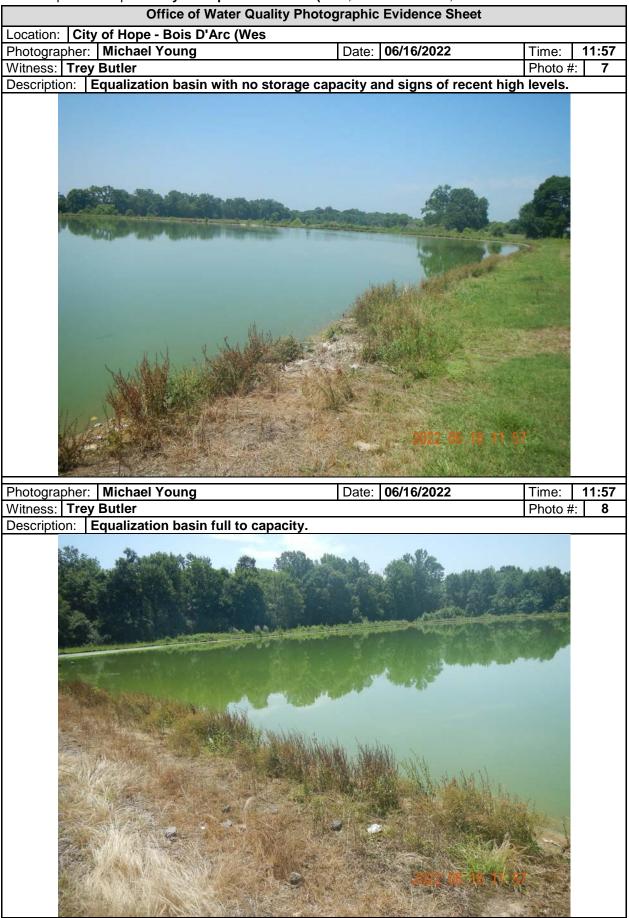
SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED:	Øy 🛛 n 🖓 na 🖓 ne
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	Øy 🛛 n 🗆 na 🗆 ne
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	
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: Parshall Flume	🗹 Y 🗆 N 🗆 NA 🗆 NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	Øy 🛛n 🖓na 🖓ne
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: Totalizer	
4. CALIBRATION FREQUENCY ADEQUATE:	Øy 🛛 n 🖓 na 🖓 ne
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Øy 🛛n 🖓na 🖓ne
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	Øy 🛛n 🖓na 🖓ne
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	Øy 🛛n 🖓na 🖓ne
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	OS OM OU ONA ØNE
DETAILS: Laboratory Information reviewed by OWQ - Enforcement Branch	
EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES): IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: QUALITY CONTROL PROCEDURES ADEQUATE:	
 QUALITY CONTROL PROCEDURES ADEQUATE. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME: 	
6. SPIKED SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: Arkansas Analytical	
b. LAB ADDRESS: <u>Little Rock, AR</u>	
c. PARAMETERS PERFORMED: Metals and Nutrients	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

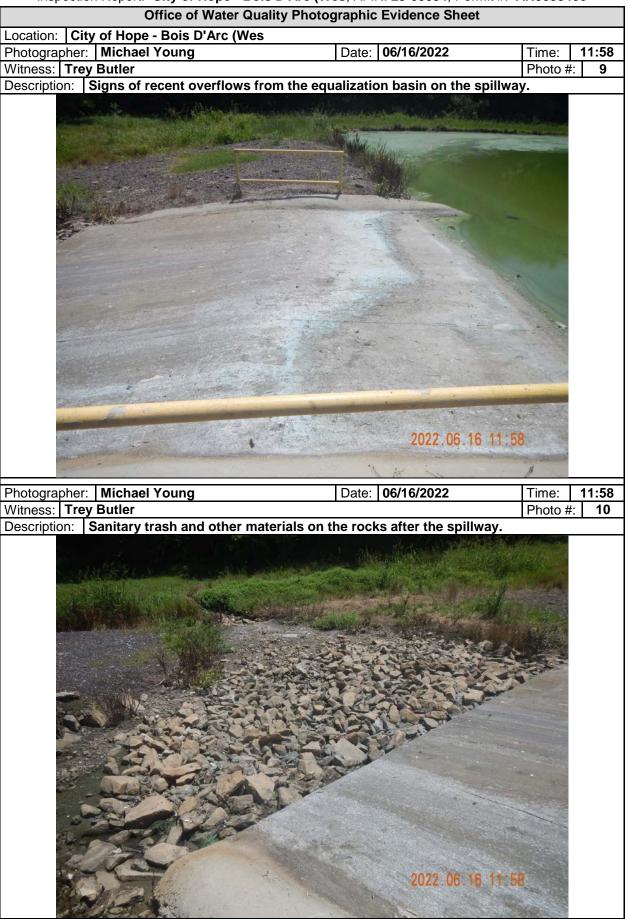
SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS									
BASED ON VISUAL OBSERVATIONS ONLY						ØS OM OU ONA ONE			
DETAILS:									
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER		
001	N	N	N	N	N	Colorless			
						·			
SECTION H	: SLUDGE DIS	POSAL							
SLUDGE D	DISPOSAL MEE		ØS OM OU ONA ONE						
DETAILS:									
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m			
2. SLUDGE RI	ECORDS MAINTAINED	DAS REQUIRED BY 40) CFR 503:			⊠s ⊡m			
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):				
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES						
SAMPLE R	ESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ØNA ⊡NE		
DETAILS:									
1. SAMPLES (OBTAINED THIS INSPE	ECTION:				ΠY	□n Øna □ne		
2. TYPE OF S	AMPLE: GRAB:		METHOD: FREQUE	NCY:					
3. SAMPLES F	PRESERVED:					ΠY	□n Øna □ne		
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				ΠY			
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	/ICE:				□n Øna □ne		
6. SAMPLE RE	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				⊡n Øna ⊡ne		
7. SAMPLE SF	PLIT WITH PERMITTER	Ξ:					□n Øna □ne		
8. CHAIN-OF-	CUSTODY PROCEDUI	RES EMPLOYED:					□n Øna □ne		
9. SAMPLES (COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY	□n Øna □ne		
	: STORM WAT								
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			U ØNA ⊡NE		
DETAILS:									
	DATED AS NEEDED:								
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:						
	N PREVENTION TEAM								
	N PREVENTION TEAM):						
	DTENTIAL SOURCES A		-						
	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:						
	RUCTURAL BMPS:								
	DN-STRUCTURAL BMF								
	PERLY OPERATED A								
11. INSPECTIO	INS CONDUCTED AS I	KEQUIKED:				ЦY			



	Office of Water Quality	Photographic Evidence Sheet	
Location:	City of Hope - Bois D'Arc (Wes		
Photograp	her: Michael Young	Date: 06/16/2022	Time: 11:53
Witness:	Trey Butler		Photo #: 3
Descriptio	n: Flow to equalization basin locat	tion.	
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			Participant
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57			
		2022 16 16	1.52
1		2022 06 16 1	1.00
Photograp	her: Michael Young	Date: 06/16/2022	Time: 11:53
Witness:	Trey Butler		Photo #: 4
Photograp Witness: Descriptio	Trey Butler	Date: 06/16/2022	Photo #: 4
Witness:	Trey Butler		Photo #: 4
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Witness:	Trey Butler		Photo #: 4
Witness:	Trey Butler		Photo #: 4
Witness:	Trey Butler		Photo #: 4
Witness:	Trey Butler	tainer. Note full container was be	Photo #: 4
Witness:	Trey Butler		Photo #: 4 eing disposed of.

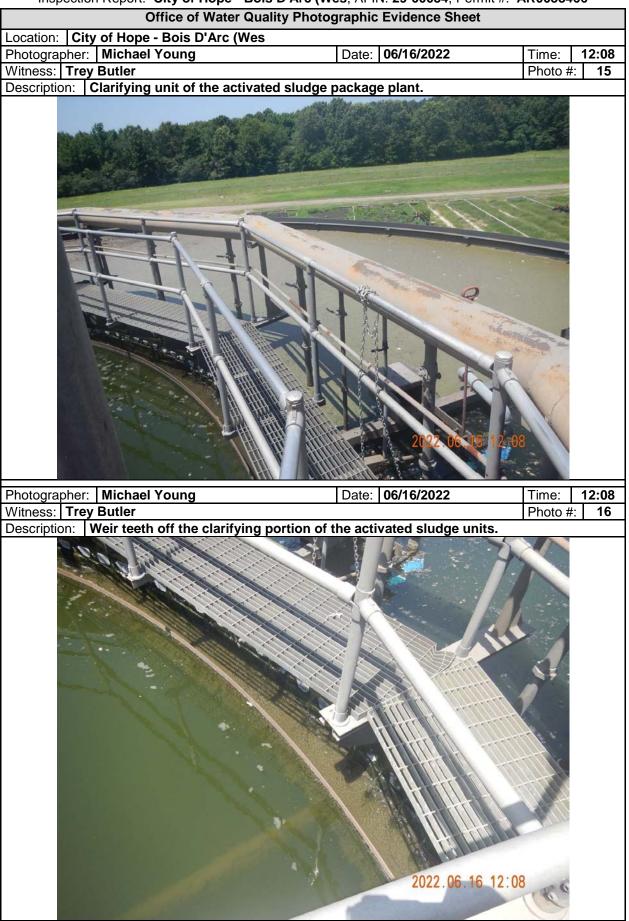




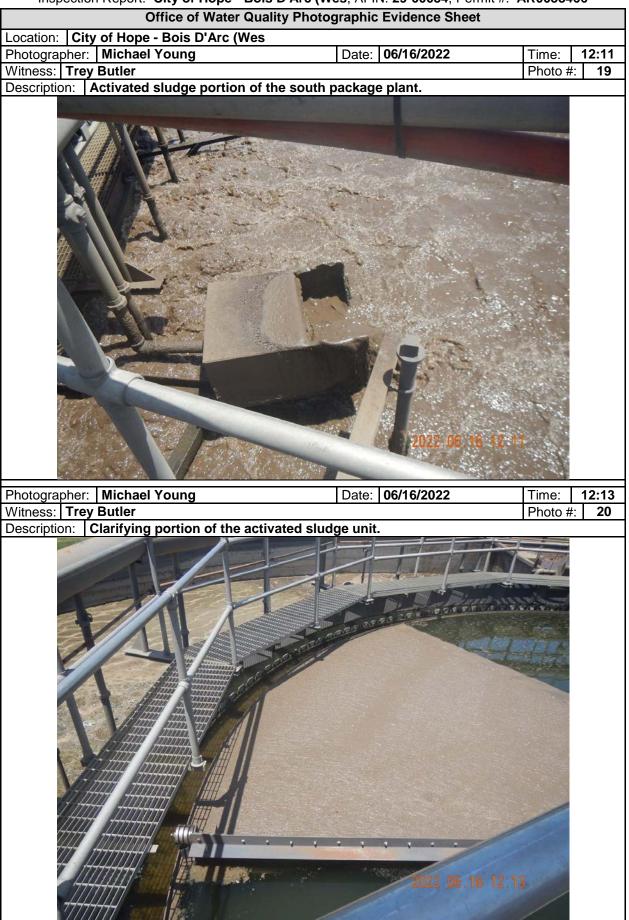


	Office of Water Quality Photo	graphic Evidence Sheet	
Location: City	/ of Hope - Bois D'Arc (Wes		
Photographer:	Michael Young	Date: 06/16/2022	Time: 11:59
Witness: Trey	Butler		Photo #: 11
Description:	Nater after the spillway of the equaliz	ation basin.	INFRANCING V NO COMON
		The States	A S
	12		
	ANZE AND		· · · · ·
Photographer:	Michael Young	Date: 06/16/2022	
Witness: Trey			Time: 11:59
	Butler		Photo #: 12
Description: 1			Photo #: 12
Description: 1	Butler		Photo #: 12















	ice of Water Quality	•			
Location: City of Hope - E	Bois D'Arc (Wes				
Photographer: Michael Ye		Date: 06/1	6/2022	Time:	12:26
Witness: Trey Butler				Photo #:	27
Description: Flow checks	s completed by the	facility monthly.			
	(Et	Alternet Alternet PLANTALET The meter CALIBR PLANTALET The meter of Meters are calibrated Meters PLANTALET Martenet Meters METER % Calibrated 1.84 2.12 9 2.12 9 2.12 9 2.12 9 2.12 9 2.12 9 2.12 9 2.12 9 2.12 9 2.12 9 2.14 9 2.14 9 2.14 9 2.14 1.79 3.11 1.412 5.11 1.412 5.11 1.57 0.12 1.57 0.12 1.60 1.01 1.00 1.01 1.00 1.01 1.00 1.12 1.00 1.12 1.00 1.12 1.00 1.12 1.00			

Figure 1. Overview of City of Hope – Bois D'Arc (West) Plant with treatment components identified.

