



September 11, 2023

Honorable Larry Bryant, Mayor City of Forrest City 225 North Washington St. Forrest City, AR 72335 Sent Via Email to: <u>lbryant@cityofforrestcityar.com</u>

RE: Forrest City WWTP Inspection AFIN: 62-00070 Permit No.: AR0020087

Dear Mayor Bryant:

On August 1, 2023, 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.

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 <u>Jason.Bolenbaugh@adeq.state.ar.us</u> or (501) 682-0659.

Sincerely,

an Relations

Jason Bolenbaugh Compliance Branch Manager, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118

		OFFICE OF WATER QUALITY							
111 - 404		INSPECTION REPORT							
		AF	AFIN: 62-00070   PERMIT #: AR002008		87		DATE:	8/1/2023	
·*	440 ENVILON	COUNTY: 62 St. Fra		Fra	ancis P	PDS #: <b>126656</b>			MEDIA: WN
		GPS LAT: 35.0012		LONG: -90.8351 LO	OCA.	ATION: Outfall			
	FACILITY INFORMAT	ION			INSF	PEC	<b>TION INFO</b>	RMATIO	N
	rrest City WWTP					INSPECT	ror ID#: P1 S - State		
	TION: ) SFC 209				FACILITY EVALUATION RATING: INSPECTION TYPE:				:
CITY:					4 - Satisfactory	Y TIME:	EXIT TIME:	mpliance	e Evaluation
Fo	rrest City				DATE(S): ENTRY 8/1/2023 09:		11:00	PERMIT EFFECTIVE DATE: 11/1/2017	
	RESPONSIBLE OFFIC	CIAL	-						<b>ZUT</b> EXPIRATION DATE:
								10/31/2022	
	norable Larry Bryant / Mayor				FAYETTEVILLE SHALE RELATED: N				
Cit	y of Forrest City				FAYETTEVILLE S				
	NG ADDRESS:								
	5 North Washington St.						ION PAR	ICIPAN	S
	rrest City AR 72335				Mr. Edwin Gregor		., Utility Ma	anager,	
PHON	IE & EXT: / FAX:				egregoryjr@forrestcitywater.com, 870-270-1756				
	0-633-1315 /				Joel Thetford, Class III Operator (005326),				
EMAI	yant@cityofforrestcityar.com				jthetford@forrestcitywater.com				
CC	NTACTED DURING INSPECTION	No			-				
	AREA EVALUATIONS								
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)									
S	PERMIT	S							
S	RECORDS/REPORTS	S			S	FACILITY SITE REVIEW			
S	OPERATION & MAINTENANCE	S			S	SELF-MONITORING PROGRAM			
S	SAMPLING	S	SLUDGE HA	E HANDLING/DISPOSAL <b>N</b> PRETREATMENT					
**	OTHER:								

### SUMMARY OF FINDINGS

No violation were noted during the inspection. The following was noted during the inspection.

- 1. Significant improvements have occurred in the plant to include reconditioning of all 3 clarifiers, specifically, the internal mechanical components were either replaced, rebuilt, or refurbished. Additionally, the 3 blower units to the aeration basins were replaced with exception of the piping network. Improvements will continue as the permittee intends to rebuild the diffusers in each of the aeration basins and will begin in Basin 2 which was currently out of operation due to a broken pipe. They anticipate beginning construction at the beginning of 2024.
- 2. The permittee performs operation checks either daily or multiple times per week in order to meet permit effluent limitations. For example, suspended solids are checked within the aeration basins three times per week; clarifier sludge is checked daily; and, dissolved oxygen is checked within the aeration basin daily.

#### GENERAL COMMENTS

The treatment type consists of a bar screen, grit chamber, activated sludge, clarification, UV disinfection, and post aeration. The design flow of the wastewater treatment plant is 2.12 MGD.

A review of Discharge Monitoring Reports (DMRs) was conducted for the period May, 2020 to June, 2023. Fifteen violations were reported during this timeframe. Those violations were Ammonia-Nitrogen (6), Fecal Coliform Bacteria (4), Total Suspended Solids (1), and Analysis Not Conducted (4).

From July, 2022 to June, 2023 the permittee reported 6 Sanitary Sewer Overflows (SSO) in which approximately 3,700 gallons was released. No evaluation of the collection system was conducted during the site visit.

To inquire about WET testing frequency reductions please contact Mary Barnett at 501-682-0666 or at <u>Mary.Barnett@adeq.state.ar.us</u>.

INSPECTOR'S SIGNATURE:	←Click text to left to add signatu	-Inspector Name	DATE:
	ann Rehenbrand		
SUPERVISOR'S SIGNATURE		Jason Bolenbaugh	DATE: 9/9/2023

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ONE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: Names listed above remain correct. DEQ received a new Change of Authorization request on February 15, 2023 for Mayor Bryant.	🗹 y 🗆 n 🗆 na 🗆 ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	DY DN ØNA DNE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: Outfall 001 located at coordinates listed above.	Øy On Ona One
4. ALL DISCHARGES ARE PERMITTED:	🗹 Y 🗆 N 🗆 NA 🗆 NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	ØS OM OU ONA ONE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: Refer to DMR calculation sheet below	🗹 Y 🗆 N 🗆 NA 🗆 NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: Reviewed November 2022 Chain-of-Custodies and Laboratory Analysis sheets	🗹 s 🗆 m 🗇 u 🗆 na 🗠 ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING: Joel Thetford	Øy 🛛 n 🖓 na 🖓 ne
d. ANALYTICAL METHODS AND TECHNIQUES:	Øy On Ona One
e. RESULTS OF CALIBRATIONS: Calibration procedures in the office.	
f. RESULTS OF ANALYSES:	Øy 🛛 n 🗆 na 🗇 ne
g. DATES AND TIMES OF ANALYSES:	Øy 🛛 n 🗆 na 🗆 ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
<ol> <li>LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: Mr. Thetford maintains pH and DO calibration logs.</li> </ol>	Øs 🖙 🗤 🖓 na 🕬 ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: Logs kept of replacements	Øs 🖙 🗤 🖓 na 🕬 ne
and maintenance of parts 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: Loadings calculated and	
reported by Environmental Services Company, Inc.	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	ØS OM OU ONA ONE
1. TREATMENT UNITS PROPERLY OPERATED:	Øs Om Ou Ona One
2. TREATMENT UNITS PROPERLY MAINTAINED: The permittee conducts a variety of operational checks daily to ensure the plant	
operates efficiently and permit effluent limitations are met. 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: 2 backup generators (418 KW). One generator is for the operation of	
the main pump station near the treatment plant. The second generator is at the treatment plant and will operate the bar screen and flow diversion switch that can divert flows to the EQ basins.	🗹 s 🗆 m 🗇 u 🗆 na 🗠 ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🖙 🗤 🖓 na 🕬
<ol> <li>ALL NEEDED TREATMENT UNITS IN SERVICE: The #2 clarifier and #2 aeration basin were not in operation. The clarifier was awaiting a torgue test and the aeration basin needs to have a pipe repaired and is scheduled to have diffusers replaced in</li> </ol>	Øs 🖙 🗆 🖛 🖛
2024.     6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: Joel Thetford (Class III, Advanced Industrial), John Weikle, Seth	
Essary, Edwin Gregory	Øs 🗆m 🗇u 🖾na 🖾ne
<ol> <li>SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: Chain links, trash rake bearing, blower motors and bearings, spare diffuser parts, blower parts, clarifier parts, UV bulbs, sensors, extra motors for grit removal and scum pit</li> </ol>	🗹 s 🗆 m 🗇 u 🗇 na 🗇 ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	Dy On Ona Øne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	Dy On Ona Øne
<ol> <li>PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: In the event of an emergency the permittee has the ab to divert flows from the activated sludge operation to the EQ basin.</li> </ol>	ility 🛛 🖓 🖓 N 🖓 NA 🖓 NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: From 71/2022 6/30/2023, 6 overflows were reported releasing approximately 3,700 gallons. No bypasses have occurred at the plant since 2016	
2017.	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	Dy On Øna One

SECTION D: SAMPLING							
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE						
DETAILS: Reviewed November, 2022 Chain of Custodies and Sample Analysis Sheets							
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:							
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:							
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:							
<ol> <li>SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT: CBOD₅, TSS, NH₃-N, DO, FCB, TP, N N<sup>2</sup>, TRC (copper), TRA, and pH.</li> </ol>							
<ol> <li>SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT: Varies from three/week, once/month, once/guarter.</li> </ol>							
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:							
a. SAMPLES REFRIGERATED DURING COMPOSITING: Sampler was at ~3°C							
b. PROPER PRESERVATION TECHNIQUES USED:							
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:							
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	ØS OM OU ONA ONE						
DETAILS:							
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED? TYPE OF DEVICE: 12" Parshall Flu							
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED: Once/day							
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: Greyline In: Inc. SLT32 Level & Flow Monitor	struments ØY DN DNA DNE						
4. CALIBRATION FREQUENCY ADEQUATE: Calibrated on 8/3/2022. Due for calibration on 8/3/2023. See flow calculation she	eet below. ØY 🛛 N 🗆 NA 🗆 NE						
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:							
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:							
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:							
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	ØS OM OU ONA ONE						
DETAILS:							
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :							
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	Dy Dn Øna Dne						
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:							
4. QUALITY CONTROL PROCEDURES ADEQUATE:	DY DN DNA ØNE						
5. DUPLICATE SAMPLES ARE ANALYZED >10% OF THE TIME:							
6. SPIKED SAMPLES ARE ANALYZED >10% OF THE TIME:							
7. COMMERCIAL LABORATORY USED:							
a. LAB NAME: Environmental Services, Inc. (effluent testing)							
b. LAB ADDRESS: 13715 W. Markham, Little Rock, AR 72211							
c. PARAMETERS PERFORMED: NH₃-N, TSS, FCB, CBOD₅, TP, NO₃+NO₂-N, TRC (copper)							
8. BIOMONITORING PROCEDURES ADEQUATE: June 14, 2022 – completed by Huther & Associates, Inc.							
a. PROPER ORGANISMS USED: Ceridaphnia dubia and Pimephales promelas							
b. PROPER DILUTION SERIES FOLLOWED: 32, 42, 56, 75, 100 (Critical Dilution)							
c. PROPER TEST METHODS AND DURATION:							
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Dy On Øna One						

# Inspection Report: Forrest City WWTP, AFIN: 62-00070, Permit #: AR0020087

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS										
BASED ON VISUAL OBSERVATIONS ONLY										
DETAILS: Outfall 001; unnamed tributary of L'Anguille River.										
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER			
001	None	None	None	None	None	Clear				
SECTION H	I: SLUDGE DIS	POSAL								
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	ГS		ØS 🗆 M 🗆	U DNA DNE			
			are used as a di	version pond w	/here sludge is p	umped to the n	orth pond			
	d to accumulate									
		ATE TO MAINTAIN EF								
-		D AS REQUIRED BY 40				⊠s ⊔m				
		YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):					
Sludge depth ch										
		SPECTION PRO								
		HIN PERMIT R				LIS LIM L	U ØNA ⊡NE			
		not conducted d	luring this insp	ection.			<b>—</b>			
-						LIY	On Øna One			
			IETHOD: FREQUE	NCY:			<b>D D</b>			
3. SAMPLES PRESERVED:										
	<ul> <li>4. FLOW PROPORTIONED SAMPLES OBTAINED:</li> <li>5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:</li> </ul>									
			E OF DISCHARGE:							
							DN ØNA DNE			
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:										
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:										
SECTION		ER POLLUTION	DREVENTION							
		EMENT MEET								
DETAILS:										
		DATE OF LAST UP	DATE				DN DNA ØNE			
	· · · · · · · · · · · · · · · · · · ·	HARGES AND SURFAC								
3. POLLUTION PREVENTION TEAM IDENTIFIED:       LIY LIN LINA         4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:       LIY LIN LINA										
4.     FOLLOFION FREVENTION TRANSPORTED THANNED.       5.     LIST OF POTENTIAL POLLUTANT SOURCES:										
6.     LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:										
7.     ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:										
8. LIST OF STRUCTURAL BMPS:										
10. BMPS PROPERLY OPERATED AND MAINTAINED:										
11. INSPECTIONS CONDUCTED AS REQUIRED:										

# FLOW CALCULATION SHEET

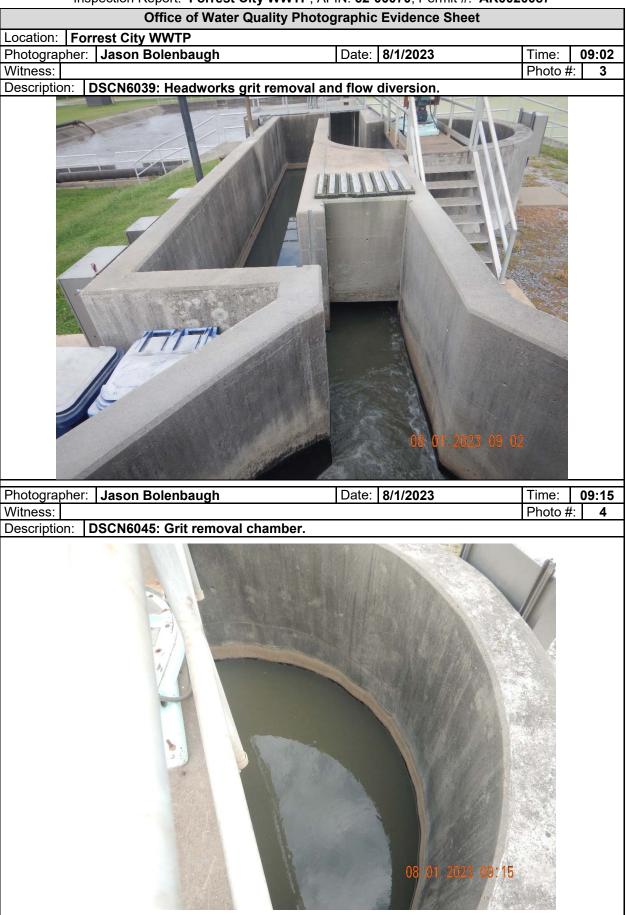
Date: 8/1/2	2023	Time: <b>10:2</b>	3					
Head in Inc	hes: <b>9.25</b>	Feet: <b>0.77</b>						
Type & Size of Primary Flow Measurement Device: <b>12" Parshall Flume</b>								
	•	Flow Measurement Dev						
Greyline In	istruments, Inc. Sl	LT32 Level & Flow Mo	onitor					
Data aflact			0/0000					
Date of last	Calibration of Seco	ondary Flow Device: <b>8</b> /	3/2022					
Recorded F	Flow at Date & Time	e Listed Above (Facility Flo	ow Meter): <b>1,706 MGD</b>					
Calculated	Flow at Date & Tim	ne Listed Above: 1.737						
(Flow is calculat	ted using flow charts in: <u>IS</u>	CO Open Channel Flow Measu	rement Handbook-5 <sup>th</sup> Edition)					
	Recorded Value	- Calculated Value						
% Error =		ated Value	X 100					
	Calcul							
o/ <b>F</b>	1.706	- 1.737	X 400					
% Error =		1.737	- X 100					
% Error =	-0.031	X 100						
70 EITOI =	1.737	X 100						
0/ Emer = 0.470 × 400								
% Error =	-0.178	X 100						
% Error =	-1.78	%						
		<u> </u>						
Comments	Flow meter is rea	ading within ±10% of t	the actual flow.					

## **DMR Calculation Check**

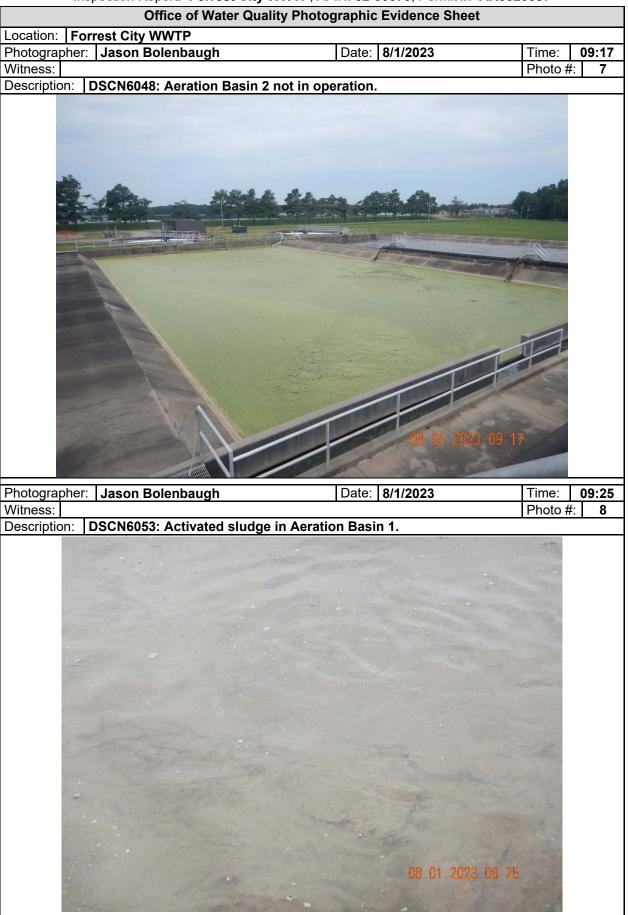
Reporting Period:	From	2022	11	1	_ To _	2022	11	30		
		Year	Month	Day		Year	Month	Day		
Parameter Checked:		TSS	_							
		Loading				Concen	tration			
		Mass			Monthly					
	Mo.	Mo. Avg Ibs/day			Mo. Avg mg/l 7-day Av			ı mg/l		
Reported Value:		93.4			7.7		8.3	3		
Calculated Value:		93.3			<7.39		8.3	3		
Permit Value:		353.6			20		30			

If calculated value does not equal reported value, explain: Minor discrepancy with monthly average concentration.

























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