



March 8, 2024

David Green, Utilities Manager City of Arkadelphia PO Box 495 Arkadelphia, AR 71923

Email Address: david.green@arkadelphia.gov

RE: City of Arkadelphia Inspection

AFIN: 10-00463 Permit No.: AR0020605 – PDS# 129015 & 129016

ARR000190 – PDS# 129017

Dear Mr. Green:

On January 30, 2024, I performed a Compliance Evaluation Inspection (CEI), Collections Systems 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 the inspection reports are 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 March 25, 2024.

If I can be of any assistance please contact me at Michael.young@adeq.state.ar.us or 501-837-2073.

Sincerely,

Michael Young

Milly

Inspector Supervisor, Office of Water Quality

COUNTY: 10 Clark



ENVIRONMENTAL QUALITY

RECORDS/REPORTS

SAMPLING

OTHER:

OPERATION & MAINTENANCE

OFFICE OF WATER QUALITY INSPECTION REPORT

PDS #: 129015

MEDIA: WN

AFIN: 10-00463 | PERMIT #: AR0020605 | DATE: 1/30/2024

CDC | AT: 24 004447 | ONC: 02 054524 | OCATION: Entrance

GPS LAT: 34.084117 LONG: -93.051534 LOCATION: Entrance						
FACILITY INFORMATION	INSPECTION INFORMATION					
NAME: City of Arkadelphia LOCATION:	FACILITY TYPE: INSPECTOR ID#: 1 - Municipal 101531 S - State					
1047 South 3 rd Street	4 - Satisfactory	•	Comp	Diance Evaluation		
Arkadelphia, AR	` '		2:45	PERMIT EFFECTIVE DATE:		
RESPONSIBLE OFFICIAL				11/1/2023 PERMIT EXPIRATION DATE:		
David Green / Utilities Manager				10/31/2028		
COMPANY:	FAYETTEVILLE	SHALE REI	LATED:	N		
City of Arkadelphia MAILING ADDRESS:	FAYETTEVILLE SHALE VIOLATIONS: N					
PO Box 495	INSPECTION PARTICIPANTS					
CITY, STATE, ZIP: Arkadelphia AR 71923 PHONE & EXT: / FAX:	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: David Thomason/Operator (Lic. #001842) Anna Ray/Operator (Lic. #012594)					
870-246-5863 / 870-246-9546 EMAIL:	Elizabeth Given	s/DEQ OW	Q Area	3 Water Inspector		
david.green@arkadelphia.gov						
CONTACTED DURING INSPECTION: No						
AREA EVA	ALUATIONS htisfactory, N=Not Applicable/l	Evaluated)				
** PERMIT	REMENT	** STC	RMWA	TER		

SUMMARY OF FINDINGS

EFFLUENT/RECEIVING WATER

SLUDGE HANDLING/DISPOSAL

- 1.) At the time of inspection the aerators in the Industrial Pretreatment Iagoon were not in operation. This is a violation of permit condition Part III. (B.) (1.) (A.)
- 2.) At the time of inspection the flowmeter was out of date for calibration. This is a violation of permit condition Part III. (C.) (2.).

LABORATORY

At the manhole following final treatment and before final discharge at the Ouachita River I observed heavy foaming that was attributed to be naturally occurring. This foam dissipated quickly when exposed to oxygen and did not feel greasy or like a surfactant. Additionally, there was water on top of the manhole cover. Any discharge from this manhole would need to be reported within 24 hours of observation per condition Part III. (D.) (6.). If the river level of the Ouachita River is consistently causing the discharge at the manhole then a check valve or back flow preventer may need to be considered.

FACILITY SITE REVIEW

PRETREATMENT

SELF-MONITORING PROGRAM

GENERAL COMMENTS

On January 30, 2024, I performed a Compliance Evaluation Inspection (CEI) at City of Arkadelphia Wastewater Treatment Facility (WWTF) with the above participants in attendance. The City of Arkadelphia is permitted to operate a WWTF with a design of an aerated industrial pretreatment lagoon that feeds into a splitter box that feeds water to Oxidation Ponds 1, 2, and 3. Each oxidation pond can discharge to the aquaculture pond. The aquaculture pond has plastic structures to contain duckweed, is aerated, and chemical addition of 35% Hydrogen Peroxide (when needed). Disinfection is completed using sodium hypochlorite and after contact flow is measured through a 49.5" rectangular weir with end contractions. The discharge falls from the weir to add post-aeration and is discharged to the Ouachita River. Sample collections and analysis are completed by City of Arkadelphia staff and in 2022 the laboratory was requested to send information to OWQ Enforcement Branch.

Facility Evaluation:

We entered the facility gates and traveled to the buildings that contain disinfection equipment and flow devices. In the chemical storage room I observed a dosing machine and storage of sodium hypochlorite and they were operating correctly (see photos 1-4). The final stage of the WWTF is an aquaculture pond that has optional application of hydrogen peroxide (see photo 5). At the chlorine contact chamber I observed that the water was a greenish color but had clarity, indicating that the recent high rain events had caused higher flow rates in the WWTF (see photos 6-7). Flow rates for the facility were very high and the water falling over the weir was causing foaming (see photo 8). I observed the foam coming out of the manhole immediately downstream of the weir and some standing water on the top of the concrete (see photos 9-10). The foam quickly dissipated when exposed to oxygen and did not leave a residue on the grass. We discussed that recently the Ouachita River level had risen after storms which caused some of the discharge to back up in the pipe. I informed the operators that any discharge from that manhole or the WWTF due to high river levels would require reporting per condition Part III. (D.) (6.). The primary flow measurement device is a rectangular weir with end contractions and the facility uses a totalizer (see photo 11). Inside the small building I observed the totalizer and the sticker indicated that calibration needs to be performed (see photo 12). We drove the entire levee system around Oxidation Ponds 1, 2, and 3 and stopped at the splitter box where we observed high influent rates (see photo 13). At the pretreatment lagoon the operators stated that the aerators were not in operation (see photos 14-15). During the collections systems inspection we stopped at the bar screen which is not at the WWTF but before the main influent pumps and we did not observe any issues (see photos 16-17). There were no other issues with the operation of the treatment system.

Records Review:

Following the inspection I requested records for September 2023. I received a spreadsheet that had all of the results from the internal lab analysis. The results entered into NetDMR were the same as the results in the spreadsheet. In 2022, the internal lab at the City of Arkadelphia was required to send information to the DEQ Laboratory group and Christie Daniel stated that they are still completing some of the recommendations for improving the laboratory quality control.

Miller	
INSPECTOR'S SIGNATURE: Michael Young	DATE: 01/31/2024
Jan Redelina	
SUPERVISOR'S SIGNATURE: Jason Bolenbaugh	DATE: 3/6/2024

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:	
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:	•
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 Øn □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□y □n ☑na □ne
	- 11-

SE	ECTION D: SAMPLING	
PI	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y □N □NA □NE
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	Øy □n □na □ne
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	Øy □n □na □ne
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	Øy □n □na □ne
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	Øy □n □na □ne
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE
á	a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y □N □NA □NE
ŀ	D. 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
SE	ECTION E: FLOW MEASUREMENT	
PI	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	□S ☑M □U □NA □NE
DI	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: Rectangular V end contractions	<u>Veirw/</u> ☑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: Siemens	□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
	ECTION F: LABORATORY	
PI	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DI	ETAILS: Laboratory was requested to send documents to Enforcement in 2022.	
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:	Øy □n □na □ne
5.	DUPLICATE SAMPLES ARE ANALYZED > 10% OF THE TIME:	Øy □n □na □ne
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE
7.	COMMERCIAL LABORATORY USED:	☑Y □N □NA □NE
- 6	a. LAB NAME: Arkansas Anlytical	
ŀ	b. LAB ADDRESS: Little Rock	
(2. PARAMETERS PERFORMED: WET Testing Only	
8.	BIOMONITORING PROCEDURES ADEQUATE:	ØY □N □NA □NE
-	a. PROPER ORGANISMS USED:	✓Y □N □NA □NE
	p. PROPER DILUTION SERIES FOLLOWED:	✓Y □N □NA □NE
	2. PROPER TEST METHODS AND DURATION:	Øy □n □na □ne
-	d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Øy □n □na □ne

BASED ON VISUAL OBSERVATIONS ONLY DETAILS; Foam was abundant but was dissipting fast. UUFALLE; Foam was abundant but was dissipting fast. OUTALLE; OiL SHEEN OREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COLOR OTHER OOT N N N N Yes N GREASE TURBIDITY OF SHEET O	SECTION G	: EFFLUENT/R	ECEIVING WAT	TERS OBSERVA	ATIONS						
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	11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:				□Y	□N ☑NA □NE			

DMR Calculation Check

01

To 2023

09

30

09

	Year	Month	Day	Year	Month	Day
Parameter Checked:	TSS					
	Loading Mass			Concentra Month		
	Mo. Avg Ibs/da	ау	Mo. Avg m	ıg/l	7-day Avg	mg/l

 Reported Value:
 58.3
 16.6
 29.0

 Calculated Value:
 58.3
 16.6
 29.0

Permit Value: 751 30.0 45.0

If calculated value does not equal reported value, explain:

Equal

Reporting Period:

From

2023

Office of Water Quality Photographic Evidence Sheet								
Location:	Location: City of Arkadelphia							
Photograp	Photographer: Michael Young			01/30/2024	Time:	10:24		
Witness:	Eliza	beth Givens			Photo #:	1		

Description: Sodium hypochlorite (liquid bleach) used for disinfection.



Photographer:Michael YoungDate:01/30/2024Time:10:24Witness:Elizabeth GivensPhoto #:2

Description: Dosing pump for liquid feed of bleach.



City of Arkadelphia Photographer: Michael Young Date: 01/30/2024 Time: 10:26 Witness: Elizabeth Givens Photographer: 7 Photographer: Photographer: Photographer: 7 Photograp

Description: Additional storage tank for bleach.

Photographer:Michael YoungDate:01/30/2024Time:10:26Witness:Elizabeth GivensPhoto #:4Description:Label for storage tank.



City of Arkadelphia Photographer: Michael Young Date: 01/30/2024 Time: 10:27 Witness: Elizabeth Givens Date: 5

Description: Aquaculture pond in background and tank of hydrogen peroxide.



Photographer: Michael Young Date: 01/30/2024 Time: 10:28
Witness: Elizabeth Givens Photo #: 6

Description: Chlorine contact chamber with greenish colored water that had clarity.



Office of Water Quality Photographic Evidence Sheet Location: City of Arkadelphia Photographer: Michael Young Date: 01/30/2024 Time: 10:30 Witness: Elizabeth Givens Photo #: 7 Description: End of chlorine contact chamber.



Photographer:Michael YoungDate:01/30/2024Time:10:30Witness:Elizabeth GivensPhoto #:8

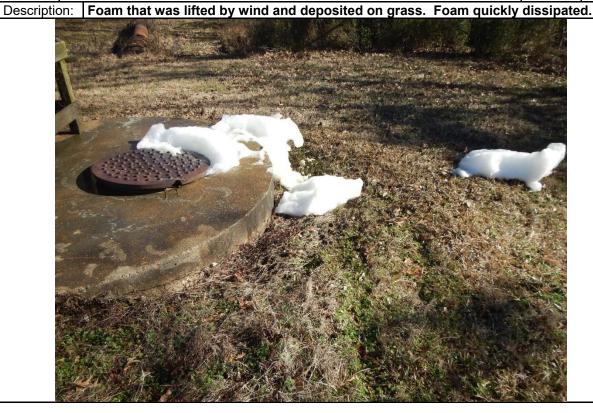


Office of Water Quality Photographic Evidence Sheet									
Location:	Location: City of Arkadelphia								
Photograp	oher:	Michael Young	Date:	01/30/2024	Time:	10:34			
Witness:	Eliza	beth Givens			Photo #:	: 9			

Description: Foam exiting manhole and some green colored liquid on cement surface.



Photographer:Michael YoungDate:01/30/2024Time:10:34Witness:Elizabeth GivensPhoto #:10

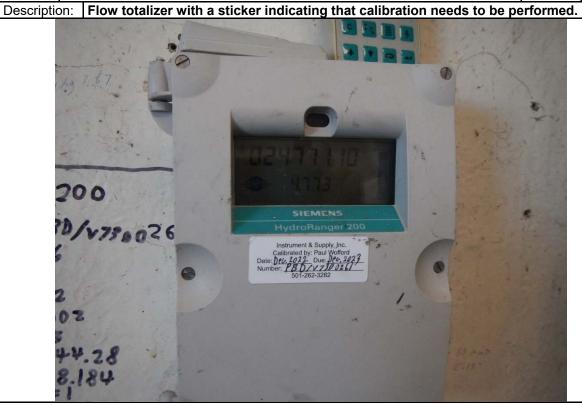


Office of Water Quality Photographic Evidence Sheet								
Location: C	City	of Arkadelphia						
Photographe	er:	Michael Young	Da	ate:	01/30/2024	Time:	10:37	
Witness: EI	Witness: Elizabeth Givens						11	

Description: Flow over the rectangular weir with end contractions.



Photographer:Michael YoungDate:01/30/2024Time:10:39Witness:Elizabeth GivensPhoto #:12



Office of Water Quality Photographic Evidence Sheet								
Location:	City	of Arkadelphia						
Photograpl	ner:	Michael Young	Date:	01/30/2024	Time:	11:04		
Witness: I	Witness: Elizabeth Givens Photo #:							



Photographer:Michael YoungDate:01/30/2024Time:11:10Witness:Elizabeth GivensPhoto #:14



Office of Water Quality Photographic Evidence Sheet								
Location: 0	City	of Arkadelphia						
Photographe	er:	Michael Young	Date:	01/30/2024	Time:	11:12		
Witness: E	Witness: Elizabeth Givens							



Photographe	er: Michael Young	Date:	01/30/2024	Time:	11:52
Witness: El	lizabeth Givens			Photo #:	16





Inspection Report: City of Arkadelphia, AFIN: 10-00463, Permit #: AR0020605 Office of Water Quality Photographic Evidence Sheet Location: City of Arkadelphia Photographer: Michael Young Date: 01/30/2024 Time: 11:56 Witness: Elizabeth Givens Photo #: 17 Description: Traveling bar screen in operation. Photographer: Date: Time: Witness: Photo #: Description: Intentionally left blank.

Figure 1. Overview of City of Arkadelphia WWTP and the treatment areas indicated.

Aerated pretreatment

Pond 1

Pond 2

Disinfection, flow, discharge to Quachita River

Aquaculture pond

Pond 3