



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Washington, D.C. 20460

# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 A R 0 0 4 9 6 1 1 11 12 0 6 0 8 2 4 17 18 S 19 S 20 2					
Remarks					
A F I N 3 0 - 0 0 3 4 3 H O T S P R I N G C O					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 2 69	70 3	71 N	72 N	73	74 75

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>Hot Springs Power Company, LLC</b> 410 Henderson Road off of Hwy. 270 West of Hot Springs, AR	Entry Time /Date 1030 on 8/24/06	Permit Effective Date April 1, 2004
	Exit Time/Date 1440 on 8/24/06	Permit Expiration Date March 31, 2009
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) David Mailoux – Operations Mgr. – 501-467-3232 ext 104	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Steve Bates – Plant Manager – 501-467-3232</b> 410 Henderson Road Malvern, Arkansas 72104	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

## Section C: Areas Evaluated During Inspection

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

S	Permit	U	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	U	Laboratory	N	Storm Water	M	Other: DMR's

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Permittee is not performing duplicate analysis on pH.  
Permittee is not performing self checks on the flow measuring device to ensure its accuracy.  
Permittee has not developed written SOP's for in house labs analysis and sampling.

DMR's were reviewed for the last quarter.

Name(s) and Signature(s) of Inspector(s) Jim McSwain	Agency/Office/Telephone/Fax ADEQ / Hot Springs / 501-520-0541 / 501-520- 5978	Date 5/31/06
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**SECTION A - PERMIT VERIFICATION**

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS  S  M  U  NA (FURTHER EXPLANATION ATTACHED No)  
 DETAILS:

- 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE  Y  N  NA
- 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES  Y  N  NA
- 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT  Y  N  NA
- 4. ALL DISCHARGES ARE PERMITTED  Y  N  NA

**SECTION B - RECORDKEEPING AND REPORTING EVALUATION**

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No)  
 DETAILS:

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.  Y  N  NA
- 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.  S  M  U  NA
  - a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING  Y  N  NA
  - b) NAME OF INDIVIDUAL PERFORMING SAMPLING  Y  N  N/A
  - c) ANALYTICAL METHODS AND TECHNIQUES.  Y  N  NA
  - d) RESULTS OF ANALYSES AND CALIBRATIONS.  Y  N  NA
  - e) DATES AND TIMES OF ANALYSES.  Y  N  NA
  - f) NAME OF PERSON(S) PERFORMING ANALYSES.  Y  N  NA
- 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.  S  M  U  NA
- 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.  S  M  U  NE
- 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.  Y  N  NA

**SECTION C - OPERATIONS AND MAINTENANCE**

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No)  
 DETAILS:

- 1. TREATMENT UNITS PROPERLY OPERATED.  S  M  U  NA
- 2. TREATMENT UNITS PROPERLY MAINTAINED..  S  M  U  NA
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.  S  M  U  NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.  S  M  U  NA
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE.  S  M  U  NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.  S  M  U  NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.  S  M  U  NE
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.  Y  N  NA
- STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.  Y  N  NA
- PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.  Y  N  NE

**SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)**

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?  Y  N  NA  
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?  Y  N  NA  
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?  Y  N  NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?  Y  N  NA  
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?  Y  N  NA

**SECTION D - SELF-MONITORING**

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No ).  
 DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.  Y  N  NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.  Y  N  NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.  Y  N  NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.  Y  N  NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.  Y  N  NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE  Y  N  NA
- a) SAMPLES REFRIGERATED DURING COMPOSITING.  Y  N  NA
- b) PROPER PRESERVATION TECHNIQUES USED.  Y  N  NA
- c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136  Y  N  NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?  Y  N  NA

**SECTION E - FLOW MEASUREMENT**

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No )  
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  Y  N  NA  
 TYPE OF DEVICE V notch weir
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.  Y  N  NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.  Y  N  NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION )  Y  N  NA  
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  Y  N  NE  
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. **Permittee is not performing self checks .**  Y  N  NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.  Y  N  NA
6. HEAD MEASURED AT PROPER LOCATION.  Y  N  NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.  Y  N  NA

**SECTION F - LABORATORY**

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No )  
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)  Y  N  NA

**SECTION F – LABORATORY (CONT'D)**

- 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED  Y  N  NA
- 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  S  M  U  NA
- 4. QUALITY CONTROL PROCEDURES ADEQUATE.  S  M  U  NA
- 5. DUPLICATE SAMPLES ARE ANALYZED 10 % OF THE TIME. *No duplicates for pH.*  Y  N  NA
- 6. SPIKED SAMPLES ARE ANALYZED 10 % OF THE TIME.  Y  N  NA
- 7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Arkansas Analytical  
 LAB ADDRESS Little Rock, Arkansas  
 PARAMETERS PERFORMED TSS, Oil and Grease

**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.**  S  M  U  NA (FURTHER EXPLANATION ATTACHED No ).

**Based on visual observations only.**

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	None	None	None	None	Clear	
01A	None	None	None	None	None	Clear	
01B	None	None	None	None	None	Clear	

Comments:

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No ).  
 DETAILS: See Attachment Page 7 of 7.

- 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.  S  M  U  NA
- 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.  S  M  U  NA
- 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

**SECTION I - SAMPLING INSPECTION PROCEDURES**

(FURTHER EXPLANATION ATTACHED No ).

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

DMR Calculation Check

Reporting Period: from 06 07 01 to 06 07 31  
year month day year month day

Parameter Checked: TSS 1/7 Grab

	<u>Quantity</u>	
	<u>Mo. Avg.mg/L</u>	<u>7-dayMax.</u>
Reported Value:	5.0 mg/L	9.2 mg/L
Calculated Value:	4.96 mg/L	9.2 mg/L
Permit Value:	30 mg/L	100 mg/L

If calculated value does not equal reported value, explain:

# Hot Springs Power, LLC

410 Henderson Road, Malvern, Arkansas  
Phone: 501-467-3232

## - CERTIFICATE OF ANALYSIS -

**Our Lab#:** 2006-2349

**Your Sample ID:** Hot Springs Power 001

**Sample Type:**

**Report Date:** 05-Sep-06

### TSS

Totalsuspendedsolids	<	1.00	mg/L	8/30/2006
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### Oil & Grease

Oil and Grease	<	1.4	mg/L	8/25/2006
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Field pH		8.77	SU	8/24/2006
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Water temperature		30.0	°C	8/24/2006
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# ADEQ

A R K A N S A S  
Department of Environmental Quality

September 8, 2006

Steve Bates, Plant Manager  
Hot Springs Power Plant  
410 Henderson Road  
Malvern, Arkansas 72104

RE: AFIN: 30-00337

NPDES Permit No.: AR0049611

Dear Mr. Bates:

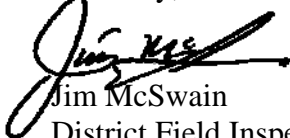
On August 24, 2006, I performed a routine compliance sampling inspection of the waste water treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. Flow meter for outfall 001 has not had self calibration checks performed to ensure its accuracy.
2. Laboratory has not been performing duplicate analysis for the parameter pH a minimum of 10% or greater.
3. Standard Operating Procedures (SOP's) have not been developed for in house sampling and analysis.

The above items require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department. This response should contain documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by September 25, 2006.

If I can be any assistance, please contact me at 501-520-0541.

Sincerely,



Jim McSwain  
District Field Inspector  
Water Division

cc: NPDES Enforcement Branch  
NPDES Permit Branch