

July 1, 2008

Steve Mallett, Utilities Manager City of Hot Springs P.O. Box 638 Malvern, Arkansas 72104

RE: AFIN: 26-00145

NPDES Permit No.: AR0033880

Dear Mr. Mallett:

On June 25, 2008, I performed a routine compliance 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 that you did not sample for phosphorous during February, March, and April as required by your permit.

The above item requires your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department at the following address:

Water Division Enforcement Section Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

This response should contain detailed documentation describing the course of action taken to correct the item noted. This corrective action should be completed as soon as possible, and the written response is due by July 20, 2008.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

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

Sincerely

Sin McSwain District 7 Field Inspector Water Division

cc: Water Division Enforcement Section Water Division Permits Section

	UNITED STATES E		Form Approved OMB No. 2040-0003								
	SEPA NPDES Com										
1	Transaction Code NPE   N 2 5 3 A R 0 0 3 3	Insp 18	ec. TypeInspectorFac. Type $C$ 19 $S$ 20 $1$								
		· · · · · ·	Remarks	· · · · · · ·							
	A     F     I     N     #     2     6     -     0	0 1 4 5		G A R L	Α	N D C O .					
	Inspection Work Days Facility Evalu	1	1 1	QA	R	Reserved					
	67 1 69 70 4	71	<b>N</b> 72	<b>N</b> 73 74 75		80					
			B: Facility		<u> </u>						
inclu	e and Location of Facility Inspected (For industrial use de POTW name and NPDES permit number)	ers discharging to POIV	V, also	Entry Time/Date 0850 on 06/25/08		Permit Effective Date February 1, 2008					
locat	of Hot Springs ed approximately 1 mile off of Shady Grove Road end of Davidson Drive			Exit Time/Date 1220 on 06/25/08		Permit Expiration Date January 31, 2013					
Nam Ron	e(s) of On-Site Representative(s)/Title(s)/Phone and Fa Wacaster, Plant Manager, 501-262-1881, fax 501-262-	ax Number(s) 0339			Othe	er Facility Data					
	e, Address of Responsible Official/Title/Phone and Fa	k Number		Contacted							
	Mallett, Utilities Director, 501-321-6810 Box 700										
Hot	Springs, Arkansas 71901			Yes No							
	(S = Sati	Section C: Areas Ev sfactory, M = Marginal,		uring Inspection isfactory, N = Not Evaluated)							
S	Permit S Flow Meas	urement	S Op	erations & Maintenance	U	Sampling					
S	Records/Reports S Self-Monit	oring Program	S Slu	ıdge Handling/Disposal	Ν	Pollution Prevention					
S		e Schedules	N Pro	etreatment	Ν	Multimedia					
S	Effluent/Receiving Waters S Laborator			orm Water		Other: DMR'S					
	Section D: Sun	mary of Findings/Con	iments (At	tach additional sheets if necessar	y)						
Per	mittee had overlooked that phosphorus had b	een added to the new	v permit a	and failed to sample for it du	ring tł	ne months of February, March,					
and	April.										
	e(s) and Signature(s) of Inspectors)	Date									
Jim	McSwain			nental Quality – Hot Springs Fiel 20-0541 – Fax 501-520-5978	d	July 1, 2008					
						· /					
Sign	ature of Reviewer	Agency/Office	Phone and	Fax Numbers		Date					

ADEQ Water NPDES Inspection		
	ADEQ Water NPDES Inspection	

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:	
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	ØS OM OU ONA ONE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🖾na 🖾ne
a. DATES AND TIME(S) OF SAMPLING:	Øy 🗆n 🗆na 🗇ne
b. EXACT LOCATION(S) OF SAMPLING:	🗹 y 🗆 n 🗆 na 🗇 ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	Øy 🛛 n 🖓 na 🖓 ne
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	MY ON ONA ONE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	Øs 🗆m 🗇u 🖾na 🗇ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆m 🗇u 🖾na 🗇ne
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	Øs □m □u □na □ne
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🗆m 🗇u 🖾na 🗇ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆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:	Øs 🗆m 🗇u 🖾na 🖾ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆m 🗇u 🖾na 🖾ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	🗹 s 🗆 m 🗇 u 🖾 na 🗇 ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🗇ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	Øy 🛛 n 🖓 na 🖓 ne
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	Øy 🛛 n 🖓 na 🖓 ne
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	Øy 🛛 n 🖓 na 🖓 ne
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	DY 🗹 N 🗆 NA 🗇 NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	Dy Dn Øna Dne

Permit #: AR0033880

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	
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:	
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 □m □u □na □ne
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: PARSHALL F	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
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	1
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) :	ØY 🛛 N 🖓 NA 🖓 NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
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:	ØY 🛛 N 🖓 NA 🖓 NE
7. COMMERCIAL LABORATORY USED:	Øy 🛛 n 🖓 na 🖓 ne
a. LAB NAME: <u>American Interplex Corporation</u>	
b. LAB ADDRESS: 8600 Kanis Road, Little Rock, AR	
c. PARAMETERS PERFORMED: Biomonitoring	
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:	Øy 🗆n 🗆na 🗇ne

	NPDES Inspection
ADEQ water	INPDES Inspection

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS												
BA	SED ON	VISUAL OBS	ERVATIONS C	ONLY			⊠s ⊏	<u>]</u> M 🗆	J 🗆 NA 🗆 NE			
DE	TAILS:											
OU	ITFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLC	DR	OTHER			
	001	NONE	NONE	NONE	NONE	NONE	CLEA	AR				
SECTION H: SLUDGE DISPOSAL												
SL	SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS											
DE	TAILS:					·						
1.	SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:				ís ⊡m				
2.	SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40	) CFR 503:			V	Ís □m				
3.	FOR LAND	APPLIED SLUDGE, TY	YPE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE): c	ompost					
SE	CTION	I: SAMPLIN	<b>G INSPECTIO</b>	ON PROCED	URES							
SA	MPLE R	ESULTS WITH	HIN PERMIT R	EQUIREMENT	S			]M 🗆	J ⊠NA □NE			
DE	TAILS:											
1.	SAMPLES (	OBTAINED THIS INSPI	ECTION:					ΠY				
2.	TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	ENCY:							
3.	SAMPLES F	PRESERVED:						ΠY				
4.	FLOW PRO	PORTIONED SAMPLE	S OBTAINED:					ΠY				
5.	SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	/ICE:				ΠY				
6.	SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				ΠY	🗆 n 🗆 na 🗆 ne			
7.	SAMPLE SP	PLIT WITH PERMITTEI	E:					ΠY				
8.	CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					ΠY	🗆 n 🗆 na 🗆 ne			
9.	SAMPLES (	COLLECTED IN ACCO	RDANCE WITH PERM	IT:				ΠY				
SE	CTION	J: STORM W	<b>VATER POLL</b>	<b>UTION PRE</b>	VENTION PL	AN						
ST	ORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5	🗆 s 🗆	]м 🗆	J ⊠NA □NE			
DE	TAILS:											
1.	SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:				ΠY	🗆 n 🗆 na 🗆 ne			
2.	SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:				ΠY				
3.	POLLUTION	N PREVENTION TEAM	I IDENTIFIED:					ΠY	🗆 N 🗆 NA 🗆 NE			
4.	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: Image: Constraint of the second secon											
5.	5. LIST OF POTENTIAL POLLUTANT SOURCES:											
6.	LIST OF PC	TENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:				ΠY	ON ONA ONE			
7.	ALL NON-S	TORM WATER DISCH	IARGES ARE AUTHOR	RIZED:				ΠY				
8.	LIST OF ST	RUCTURAL BMPS:						ΠY				
9.	LIST OF NO	ON-STRUCTURAL BMF	PS:					ΠY				
10.	BMPS PRO	PERLY OPERATED AI	ND MAINTAINED:					ΠY				
11.	INSPECTIO	NS CONDUCTED AS	REQUIRED:					ΠY	ON ONA ONE			

FLOW CALCULATION SHEET									
Date:	06/25/08		Time: 10	042					
Head in	Inches:	9.5	Feet	: 0.79					
Type & S	Size of Pr	imary Fl	ow Measure	ment Dev	vice: 4	1' Parsha	ll Flume		
		<b>,</b>							
Name &	Model of	Second	ary Flow Me	asureme	ent Dev	/ice: 00	M II Milli	tronics	
Date of I	ast Calib	ration of	Secondary	Flow Dev	vice: 0	3/31/08			
							I		
Recorde	d Flow at	Date &	Time Listed	Above:	10.4	mgd	(F	acility Flow Meter)	
Calculat	ed Flow a	at Date &	Time Liste	Above:	11.0	)3			
			in: ISCO Open				book-5 <sup>th</sup> Edit	ion)	
	Poor	orded Va	lue - Ca	loulated )					
% Error	=		ue - Calculated Value		X 100				
% Error	_	11.03	-	10.4		X 100			
/*			11.03						
		0.63							
% Error	=	11.03	— X 100						
% Error	=	0.057	X 100						
% Error	=	5.7	%						
Commer	nts:								

ADEQ Water NPDES Inspection AFIN			V: 26-00145	3880							
DMR Calculation Check											
<b>Reporting Period:</b>	From _	08 Year	02 Month	01 Day	_ To	08 Year	02 Month	28 Day			
Parameter Checked	:	TSS	_								
Loading Mass					<b>Concentration</b> <b>Monthly</b>						
	Mo. A	Avg lbs/	/day	Mo. A	vg	mg/l	7-day Avg	g mg/l			
<b>Reported Value:</b>		975			7.64		19.7	/5			
Calculated Value: 975		975			7.64		19.7	/5			
Permit Value: 150					15		23				

If calculated value does not equal reported value, explain:

ADEQ Water NPDES Inspection AFIN: 26-00145					Permit #: AR0033880						
DMR Calculation Check											
<b>Reporting Period:</b>	From	08 Year	03 Month	01 Day	_ To	08 Year	03 Month	<u>31</u> Day			
Parameter Checked	: <u>C</u> E	BOD	_								
	<b>Concentration</b> <b>Monthly</b>										
	Mo. Av	g lbs/	/day	Mo. A	vg	mg/l	7-day Avg	g mg/l			
<b>Reported Value:</b>		473			3.21		4.72	2			
Calculated Value: 473					3.21		4.72	2			
Permit Value:	1	1000			10		15				

If calculated value does not equal reported value, explain:





August 18, 2008

Steve Mallet, Utilities Manager City of Hot Springs P.O. Box 638 Hot Springs, AR 72104

RE: NPDES No.: AR0033880, Failure to Respond

Dear Mr. Mallet:

On June 25, 2008, Jim McSwain, District Field Inspector, Water Division performed a routine compliance inspection of your facility. Mr. McSwain sent you a letter dated July 1, 2008 (copy enclosed) informing you of the results of the inspection and requesting a written response by July 20, 2008. As of the date of this letter, the response has not been received. Please submit the required response to the inspection to the Department by **August 29, 2008**.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0635 or you may e-mail me at flowers@adeq.state.ar.us.

Sincerely,

Matt Flowers Enforcement Administrator NPDES Enforcement Section

Enclosure

cc: John Bailey, Technical Assistance Manager, Permit Branch, Water Division Eric Fleming, Technical Assistance Manager, Field Services Section, Water Division