

May 16, 2013

Richard Penn, Utilities Director City of Hot Springs P.O. Box 700 Hot Springs, AR 71901

Re: Compliance Evaluation Inspection (Garland County)

AFIN: 26-00145 NPDES Permit No.: AR0033880

Dear Mr. Penn:

On May 9, 2013, District 9 Field Inspector Clark Baker and I performed a Compliance Evaluation Inspection (CEI) 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. Currently the pH and fecal coliform analyses are being performed twice per day as opposed to the permit required once per day. This additional monitoring needs to be reflected on the DMR in the "frequency of analyses" column. **This is a violation of Part III, Section C.6. of the permit.**
- 2. Both primary and secondary clarifier units were observed to be in need of additional or more frequent maintenance. The clarifier weirs had excessive algae growth, the clarifier arms were not always maintaining contact with the sides; cattails and other vegetation was observed growing in the laundry areas; solids (paper products) were observed downstream of the weirs in the secondary clarifiers; and, some weirs were completely clogged with algae to the point that no water could flow through these areas. **This is a violation of Part III, Section B.1.A. of the permit.**
- 3. A minor leak was observed at the chlorine solution dosing tank. This is a violation of Part III, Section B.1.A. of the permit.

The above item requires your immediate attention. Please submit a written response to this finding to the Water Division Inspection Branch of this Department. This response should be mailed to the address below or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentations (i.e. photos) is due by May 30, 2013.

Hot Springs Regional Page 2

If I can be of any assistance, please contact me at 870 389-6970.

Sincerely,

Shan Lynch

District 7 Field Inspector

Shan Synch

Water Division

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880
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⇒ EPA							Form Approved OMB No. 2040-0003	
	NPDE							
			_	Section A: Nation				
				Section A. Nauoi	nai Data			
1	Transaction Code N 2 5 3 A R	0	NPDES 0 3 3 8	8 0 11	12 1		nspec. Type Inspector Fac. Type 8 C 19 S 20 1	
					Remarks			
	Inspection Work Days	j	Facility Evaluation R	ating	BI	QA	Reserved	
	67 69		70 4	71	N 7	72 N 73 74 75	80	
				Section 1	B: Facili	ty Data		
	ne and Location of Facility Inspected and POTW name and NPDES permi			charging to POTV	V, also	Entry Time/Date 0930 / 5-9-2013	Permit Effective Date February 1, 2013	
	y of Hot Springs Regional Plar mile off of Shady Grove Rd. at the		of Davidson Drive			Exit Time/Date 1500 / 5-9-2013	Permit Expiration Date January 31, 2018	
Goı	ne(s) of On-Site Representative(s)/T don Yates / Plant Supervisor & B	ill Rei	ss / Chief Operator			1	Other Facility Data	
	old Mauldin / Lab Manager / 501					_	Major mun.	
Nar	ne, Address of Responsible Official/	Title/l	Phone and Fax Numb	per				
	hard Penn / Utilities Director / 501	321-	6884			Contacted		
	Box 700 Springs, AR 71901					Yes No 🗹		
						During Inspection		
		1	(S = Satisfactor)	y, M = Marginal,	Г	satisfactory, N = Not Evaluated)	1	
S	Permit	S	Flow Measuremen	nt	M	Operations & Maintenance S	Sampling	
M	Records/Reports	S	Self-Monitoring F	Program	S	Sludge Handling/Disposal N	Pollution Prevention	
S	Facility Site Review	N	Compliance Sche	dules	N	Pretreatment N	Multimedia	
S	Effluent/Receiving Waters	S	Laboratory		N S	Storm Water N	Other:	
		Se	ction D: Summary	of Findings/Com	ments (A	Attach additional sheets if necessary)	•	
Sec. B – Currently the pH and fecal coliform analyses is being performed twice per day as opposed to the permit required once per day. This additional monitoring needs to be reflected on the DMR in the "frequency of analyses" column.								
Sec	c. C. 2 – Both primary and second:	arv cl	arifier units were ol	bserved to be in	need of a	additional or more frequent maintena	nce. The clarifier weirs had excessive	
alg	ae growth, the clarifier arms were	not a	lways maintaining	contact with the	sides, ca	attails and other vegetation was observ	ed growing in the laundry areas,	
solids (paper products) were observed downstream of the weirs in the secondary clarifiers, and some weirs were completely clogged with algae to the point that no water could flow through these areas.								
Sec. C, 2 – A minor leak was observed at the chlorine solution dosing tank.								
No	me(s) and Signature(s) of Inspector(s	-)		Aganov/Office/	Talanhar	na	Date	
				Agency/Office/	reichiioi		Date	
Shan Lynch Shan Lynch			ADEQ / Dist. 7	/ (870)	389-6970	May 14, 2013		
Sig	nature of Reviewer			Agency/Office	/Phone a	and Fax Numbers	Date	
Kerri McCabe Agency ADEQ/				ADEQ / NLR /	501-682	2-0642	May 15, 2013	

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880

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 ØNA □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	MY □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:	
1. 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:	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:	☑Y □N □NA □NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S ☑M □U □NA □NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	⊠s □m □u □na □ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	□s Øm □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:	Øs □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 □N □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□y Øn □na □ne

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880

SI	ECTION D: SAMPLING	
PE	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
	ETAILS:	
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y □N □NA □NE
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y □N □NA □NE
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	⊠y □n □na □ne
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y □N □NA □NE
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y □N □NA □NE
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	Øy □n □na □ne
a	a. SAMPLES REFRIGERATED DURING COMPOSITING:	Øy □n □na □ne
t	D. 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:	ØY □N □NA □NE
SI	ECTION E: FLOW MEASUREMENT	
PE	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: Parshall flume	Øy □n □na □ne
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y □N □NA □NE
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	Øy □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:	Øy □n □na □ne
9.	HEAD MEASURED AT PROPER LOCATION:	Øy □n □na □ne
SI	ECTION F: LABORATORY	
PE	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DI	ETAILS:	
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:	□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 100% OF THE TIME:	ØY □N □NA □NE
6.	SPIKED SAMPLES ARE ANALYZED <u>weekly</u>	ØY □N □NA □NE
7.	COMMERCIAL LABORATORY USED:	ØY □N □NA □NE
a	a. LAB NAME: <u>American Interplex</u>	
t	D. LAB ADDRESS: 8600 Kanis Rd.; Little Rock, AR 72204	
C	:. PARAMETERS PERFORMED: <u>biomonitoring</u>	
8.	BIOMONITORING PROCEDURES ADEQUATE:	ØY □N □NA □NE
a	a. PROPER ORGANISMS USED:	ØY □N □NA □NE
t	D. PROPER DILUTION SERIES FOLLOWED:	ØY □N □NA □NE
C	:. PROPER TEST METHODS AND DURATION:	⊠y □n □na □ne
c	I. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☑Y □N □NA □NE

ADEQ Water NPDES Inspection	AFIN: 26-00145	Permit #: AR0033880

SECTION	G: EFFLUEI	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS				
BASED ON	⊠s □m □	U 🗆 NA 🗆 NE							
DETAILS:	DETAILS:								
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER		
001	None	None	None	None	None	clear	NA		
SECTION	H: SLUDGE	DISPOSAL							
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	TS		⊠s □m □	U □NA □NE		
DETAILS:					<u>.</u>				
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □m	□U □NA □NE		
2. SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 40) CFR 503:			□s □м	□u □na ☑ne		
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	O TO: (E.G., FOREST,	, AGRICULTURAL, PU	BLIC CONTACT SITE):				
SECTION	I: SAMPLIN	G INSPECTION	ON PROCEDI	URES					
SAMPLE R	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		□s □m □	U ⊠NA □NE		
DETAILS:									
1. SAMPLES	OBTAINED THIS INSPE	ECTION:				□Y	□N ☑NA □NE		
2. TYPE OF S	SAMPLE: GRAB:	□COMPOSITE:_ N	METHOD: FREQUE	NCY:					
3. SAMPLES	PRESERVED:					□Y	□N ☑NA □NE		
4. FLOW PROPORTIONED SAMPLES OBTAINED:									
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DEV	ICE:			□Y	□n Øna □ne		
6. SAMPLE R	EPRESENTATIVE OF \	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□n Øna □ne		
7. SAMPLE S	PLIT WITH PERMITTE	E:				□Y	□N ☑NA □NE		
8. CHAIN-OF-	CUSTODY PROCEDUI	RES EMPLOYED:				□Y	□N ☑NA □NE		
9. SAMPLES	□Y	□N ☑NA □NE							
SECTION	J: STORM V	VATER POLL	UTION PRE	VENTION PLA	AN				
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	3	□ѕ□м□	U ⊠NA □NE		
DETAILS:									
1. SWPPP UP	PDATED AS NEEDED:	_ DATE OF LAST UP	DATE:			□Y	□n ☑na □ne		
2. SITE MAP I	INCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			□Y	□n ☑na □ne		
3. POLLUTION PREVENTION TEAM IDENTIFIED:							□N ☑NA □NE		
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:							□N ☑NA □NE		
5. LIST OF POTENTIAL POLLUTANT SOURCES:							□N ☑NA □NE		
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:									
7. ALL NON-S	□Y	□N ☑NA □NE							
8. LIST OF ST	RUCTURAL BMPS:					□Y	□N ☑NA □NE		
9. LIST OF NON-STRUCTURAL BMPS:									
10. BMPS PRO	-	□N ☑NA □NE							
11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:				□Y	□N ☑NA □NE		
1									

FLOW CALCULATION SHEET							
Date: 5-9	-2013	Time: 11	:52				
Head in Inc	ches: 1.02	Feet:	1.02				
Type & Siz	e of Primary F	low Measurer	nent Devid	e: 4 ft. F	Parshall flume		
Name & Mo	odel of Second	lary Flow Mea	asurement	Device:	Siemens Milltronics OCM III		
Date of last	t Calibration of	Secondary F	low Devic	ə:			
	Flow at Date &	·		0.85	(Facility Flow Meter)		
	Flow at Date &			10.67 leasurement	Handbook-5 th Edition)		
% Error =	Recorded Va	alue - Cal	culated Va	Ilue X 1	100		
% Error =	10.85	- 10.67	10.67	X 1	100		
% Error =	0.18 10.67	X 100					
% Error =	0.0168	X 100					
% Error =	1.68	%					
Comments	:						

DMR Calculation Check

Reporting Period: From 13 02 01 To 13 02 28

Year Month Day Year Month Day

Parameter Checked: CBOD

Loading **Concentration** Mass **Monthly** Mo. Avg. - lbs/day Mo. Avg. - mg/l 7-day Avg. - mg/l **Reported Value:** 354 3.17 3.70 354 3.17 3.70 **Calculated Value:** 1000 **Permit Value: 15 10**

If calculated value does not equal reported value, explain: <u>same</u>



City of Hot Springs
Municipal Utilities

Waste Water Treatment Plant 320 Davidson Drive

Hot Springs, Arkansas 71901 (501) 262-1881

(501) 262-0339 Fax

Date: May 24, 2013

To: Mr. Shan Lynch

Arkansas Department of Environmental Quality

Enforcement Section 5301 Northshore Dr. NLR AR 72118

From: James Sorrells, Facilities Operations Manager – Wastewater

Re: Compliance Evaluation Inspection (Garland County)

AFIN: 26-00145 NPDES Permit No.: AR0033880

Dear Mr. Lynch:

Concerning the on-site inspection of the Regional Wastewater Treatment Plant on May 09, 2013,

- 1. The pH and fecal coli-form will be counted in total and reflected on the DMR's.
- 2. The secondary clarifiers are on a monthly scheduled cleaning rotation. We have been in the process of training new operators in this area and should be back on schedule very soon. The primary clarifiers are on a semi-annual cleaning schedule. This will be watched and increased if needed.
- 3. The leak at the effluent contact chamber has been addressed. We have a plan in place to repair it immediately.

Please contact me at any time if you have further questions. My office phone is 1-501-262-1125, ext. 10.

Thank you,

James Sorrells Hot Springs Wastewater Treatment



June 7, 2013

Richard Penn, Utilities Director City of Hot Springs P.O. Box 700 Hot Springs, AR 71901

Re: Compliance Inspection (Garland County)

AFIN: 26-00145 NPDES Permit No.: AR0033880

Dear Mr. Penn:

I have reviewed the response pertaining to my May 9, 2013 inspection of the Hot Springs Regional wastewater treatment facility. The information provided sufficiently addresses the violations referenced in my inspection report. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 870 389-6970 or you may e-mail me at lynch@adeq.state.ar.us.

Sincerely,

Shan Lynch

District 7 Field Inspector

Shan Synch

Water Division