

September 1, 2015

James Sorrells, Facility Operations Mgr. City of Hot Springs WWTP 320 Davidson Dr Hot Springs, AR 71901

### RE: City of Hot Springs WWTP Inspections (Garland Co) AFIN: 26-00145 NPDES Permit No.: AR0033880 ARR000059

Dear Mr. Sorrells:

On August 12, 2015, I performed a Compliance Evaluation Inspection and an Industrial Stormwater Inspection of the above-referenced permits in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. Copies of the inspection reports are enclosed for your records.

Please refer to the "Summary of Findings" sections of each of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed 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. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e., photos) is due by <u>September 15, 2015</u>.

If I can be of any assistance, please contact me at <u>harmont@adeq.state.ar.us</u> or (479) 968-7339 ext. 14.

Sincerely, Jrawis Hormun Travis Harmon

Travis Harmon District 5 Field Inspector Water Division

	<b>NDEO</b>		WATER	<b>DIVISION II</b>	NSF	PEC	TION	REPORT	
<u>AULU</u>		AFIN: 26-00145 P		PERMIT #: <b>AR0033880</b>			[	DATE: 8/12/2015	
ARKANSAS			UNTY: 26 Garla	nd	PDS #: 08622		227	MEDIA: WN	
Dep	partment of Environmental Quality	GP	S LAT: 34.44944	6 LONG: -93.019	<b>062</b> L	OCAT	ION: G	eneral Area	
	FACILITY INFORMAT	IN	SPEC	TION I	NFOR	MATION			
	y of Hot Springs WWTP	FACILITY TYPE: 1 - Municipal		tor id#: 89 S - \$	State				
accation: <b>320 Davidson Dr</b> city:				FACILITY EVALUATION RATING:         INSPECTION TYPE:           4 - Satisfactory         Compliance Evaluation					
	t Springs, AR 71901			(-)	TRY TIME: 9:45	EXIT 12:		PERMIT EFFECTIVE DATE:	
RESPONSIBLE OFFICIAL				0/12/2013 0	9.45	12.	-5	2/1/2013 PERMIT EXPIRATION DATE:	
	mes Sorrells / Facility Operation	s Mg	gr.	FAYETTEVILLE	сни	E REI		1/31/2018 N	
	y of Hot Springs WWTP			FAYETTEVILLE					
	NG ADDRESS:								
	) Davidson Dr STATE, ZIP:			NAME/TITLE/PHONE/FAX/EMAIL	L/ETC.:				
	t Springs AR 71901			James Sorrells	& Go	rdon Y	ates/ C	perators	
<b>501</b>	-262-1881 / 501-262-0339								
jso	rrells@cityhs.net NTACTED DURING INSPECTION:	Vos		-					
00	NTACTED DURING INSPECTION:	163							
		atisfact	tory, M=Marginal, U=Unsa	tisfactory, N=Not Applicable/	Evaluate				
S	PERMIT	S	FLOW MEASU	REMENT	Ν		RMWA		
S	RECORDS/REPORTS	S	LABORATORY		S			ITE REVIEW	
S	OPERATION & MAINTENANCE					NITORING PROGRAM			
N SAMPLING S SLUDGE HAND			DLING/DISPOSAL	Ν	N PRETREATMENT				
Ν	OTHER:		SIIMMADV	OF FINDINGS					
No	new permit violations found duri	na t		JF FINDINGS					
Pre The Frc 201	No new permit violations found during the inspection. Previously reported noncompliance: The facility is currently operating under CAO-08-099, which requires improvements to the collection system. From July 2014-June 2015 (reviewed this inspection), the facility has reported three (3) exceedances in March 2015 with bypass of secondary treatment and a missed biomonitoring retest in the 1 <sup>st</sup> Quarter 2015. All have been previously reported to Enforcement as required.								
The				COMMENTS	4			ad water tial for	
hyo	e collection system has been imp draulic overloads at the headworl d add an additional drain to the cl	ks. N	Ir. Sorrels is pla	anning to increase	e the	height	of the	containment berm	
	e permit allows for modifications ow study needs to be completed		•	•		MGD to	o 16 M	GD. Per Mr. Sorrels,	
INS	SPECTOR'S SIGNATURE:	av	is Hermi MSCC	M Travis Harn	non			DATE: <b>9/1/2015</b>	
SU	PERVISOR'S SIGNATURE:	vr	: MSGe	Kerri McCabe				DATE: <b>9/1/2015</b>	

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS 🗆 🖾 🗆 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:	
4. ALL DISCHARGES ARE PERMITTED:	
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:	🗹 Y 🗆 N 🗆 NA 🗆 NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	🗹 s 🗆 m 🗇 u 🗆 na 🗆 ne
a. DATES AND TIME(S) OF SAMPLING:	Øy 🛛 n 🗆 na 🖾 ne
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
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:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
SECTION C: OPERATIONS AND MAINTENANCE TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED DETAILS: Plant is planning new headworks as there is increased influent due to collec	tion system improvements.
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	tion system improvements. arifiers.
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TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED         DETAILS:       Plant is planning new headworks as there is increased influent due to collect         Facility plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to raise the berm at the bar screen and add additional drain to primary classified plans to require the plans to plan the plans to plans the plans to represent the plans to plan the plan the plans to plan the plan the plan the plans to plan the plan the plans to plan the plans the plans the plan the plan the plan the plan the pl	tion system improvements. arifiers. Image: Sign and the system improvements.         Image: Sign and the system i
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TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED         DETAILS:       Plant is planning new headworks as there is increased influent due to collect         Facility plans to raise the berm at the bar screen and add additional drain to primary classical screen screen and add additional drain to primary classical screen screen and add additional drain to primary classical screen screen and add additional drain to primary classical screen screen and add additional drain to primary classical screen screen and add additional drain to primary classical screen scre	tion system improvements. arifiers.
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TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED         DETAILS:       Plant is planning new headworks as there is increased influent due to collecc         Facility plans to raise the berm at the bar screen and add additional drain to primary classical drain to provide the primary provided drain to primary classical drain to primary classical drain to primary classical drain to provide the provided drain to primary classical drain to provide the provided drain to primary classical drain to provide drain to primary classical drain to provide drain the provided drain to provide drain to provide drain the provided drain the primary classical drain to provide drain to provide drain to provide drain the provided drain to provide drain to provide drain the provide drain to provide drain to provide drain to provide drain the provide drain to provide drain the provide drain to provide drain the provide drain to provide drain to provide drain to	tion system improvements. arifiers. S DM DU DNA DNE S DM DU DNA DNE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS □M □U □NA □NE
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:	Øy 🛛 n 🗆 na 🗆 ne
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED:	
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
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: 4 ft. Parshall	flume 🗹 Y 🗆 N 🗆 NA 🗆 NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
<ol> <li>SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>Siemens Ma</u> OCMIII; calibrated 8/11/15.</li> </ol>	
4. CALIBRATION FREQUENCY ADEQUATE:	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:	Øy 🗆n 🗆na 🗆ne
9. HEAD MEASURED AT PROPER LOCATION:	Øy 🗆n 🗆na 🗇ne
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) :	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:	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED <u>&gt;</u> 10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
<ul> <li>c. PROPER TEST METHODS AND DURATION:</li> <li>d. RETESTS AND/OR TRE PERFORMED AS REQUIRED: <u>Biomonitoring retest missed in 1<sup>st</sup> Qtr. 2015 and reported to Enforce</u></li> </ul>	
4/17/2015. Prior 1 <sup>st</sup> Qtr. test conducted with suspected pathogen interference (per report).	

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS											
BASED ON	BASED ON VISUAL OBSERVATIONS ONLY										
DETAILS:	Viewed at flum	<u>e.</u>									
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER				
001	none	none	none	none	none	clear					
SECTION H: SLUDGE DISPOSAL											
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS   Image: Comparison of the second s											
DETAILS:											
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m					
2. SLUDGE R	ECORDS MAINTAINE	D AS REQUIRED BY 40	) CFR 503:			⊡s ⊡m	DU DNA ØNE				
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):						
	SAMPLING IN			-							
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊠NA ⊡NE				
DETAILS:											
	OBTAINED THIS INSP					ΠY	On Øna One				
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:							
3. SAMPLES	PRESERVED:										
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:									
	BTAINED FROM FACI		-								
	EPRESENTATIVE OF		E OF DISCHARGE:								
	PLIT WITH PERMITTE										
	CUSTODY PROCEDU										
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			Πλ					
OF OTION I	0700111117										
	: STORM WAT										
<u> </u>	ATER MANAG										
				multaneously.	See additional ins						
	PDATED AS NEEDED:										
-	INCLUDING ALL DISCH		JE WATERS:								
	N PREVENTION TEAM		A.								
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	DTENTIAL POLLUTAN						On Øna One				
	TORM WATER DISCH	IANGES ARE AUTHUR					On Øna One				
	ON-STRUCTURAL BMPS:	20.									
	PERLY OPERATED A										
	ONS CONDUCTED AS										

# FLOW CALCULATION SHEET

Date: 8/	12/15	Time: 10:	46		
Head in Ind	ches: 11.5	Feet:	0.96		
					-
Type & Siz	e of Primary Flov	v Measuren	hent Device: 4	ft. Parshall F	lume
Name & M	odel of Secondar	y Flow Mea	surement De	vice: Sieme	ens Multitronics OCMIII
		*		i I	
Date of las	t Calibration of S	econdary F	low Device:	8/11/15	
Recorded	Flow at Date & Ti	me Listed A	Above: 9.95		(Facility Flow Meter)
Calculated	Flow at Date & T	ime Listed	Above: 9.6	95	
	ated using flow charts in:				<u>-5<sup>th</sup> Edition</u> )
				1 1	
% Error =	Recorded Valu		culated Value	- X 100 -	
	Cal	culated Val	Je		
	9.95	-	9.695	N/ 400	
% Error =		9.695		- X 100 -	
	1			1	
% Error =	0.255	— X 100			
	9.695				
% Error =	0.002	X 100			
% Error =	0.2	%			
Comments					

#### **DMR Calculation Check**

Reporting Period:	From	15 Year	5 Month	1 Day	_ To _	15 Year	5 Month	31 Day
Parameter Checked:		TSS	-					
		Loading Mass				Concer Mor	ntration htly	
	Mo.	Avg Ibs/c	lay	Mo. A	vg r	ng/l	7-day Ave	g mg/l
Reported Value:		1493		8.27		10.61		
Calculated Value:		1493		8.27			10.61	
Permit Value:		1500			15		22.	5

If calculated value does not equal reported value, explain: <u>Records maintained in spreadsheet. Entered TSS and CBOD5 results in Excel and checked</u> <u>averaging calculations.</u> **DMR Calculation Check** 

Reporting Period:	From <u>15</u> Year	5 Month	To Day	9 <u>15</u> Year	5 Month	<u>31</u> Day
Parameter Checked:	CBOD5					
	Loading Mass			Concer Mon	ntration hthly	
	Mo. Avg Ibs/d	ау	Mo. Avg.	- mg/l	7-day Avg	mg/l
Reported Value:	849		4.69		6.53	
Calculated Value:	849		4.69		6.53	<u>.</u>
Permit Value:	1000		10		15	

If calculated value does not equal reported value, explain: <u>Records maintained in spreadsheet. Entered TSS and CBOD5 results in Excel and checked</u> <u>averaging calculations.</u>

Water Divis	ion Photographic Evidence Sheet	
Location: City of Hot Springs WWTP		
Photographer: Travis Harmon	Date: 8/12/15	Time: 1007
Witness: Jim Sorrels, Gordon Yates	· · ·	Photo #: 1
Description: Old bar screen (photo in (see Photo 2).	cluded for future reference). Additior	nal screens installed
Photographer: Travis Harmon	Date: 8/12/15	Time: 1008
Witness: Jim Sorrels, Gordon Yates		Photo #: 2
	in place. Also, facility reports bar sc	

	Water Divisi	on Photographic Evidence Sheet		
Location: C	ity of Hot Springs WWTP			
Photographe		Date: 8/12/15	Time:	1012
	n Sorrels, Gordon Yates		Photo #	
Description:		ects and repairs seeps. This repair is on		
Photographe	r: Travis Harmon	Date: 8/12/15	Time:	1029
	n Sorrels, Gordon Yates		Photo #	
Description:	at the headworks and dra planning to raise the berr	s and berm (right of cones) to contain h in into primary clarifiers. Mr. Sorrells re n height and add an additional drain to g improved and there is potential for pe	ports that h the clarifier	ne is s as the