

# ADEQ

ARKANSAS  
Department of Environmental Quality

February 8, 2016

John Hyde, Plant Manager  
AECC - Carl E Bailey Generating Station  
PO Box 503  
Augusta, AR 72006

RE: Carl E Bailey Generating Station Inspections (Woodruff Co)  
AFIN: 74-00024 NPDES Permit No.: AR0000400 (EXPIRED)  
ARR00A437

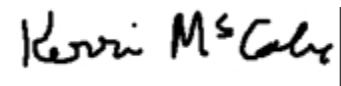
Dear Mr. Hyde:

On January 8, 2016, I performed a Compliance Evaluation Inspection and an 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. Copies of the inspection reports are enclosed for your records.

**Please refer to the “Summary of Findings” section 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 [Water-Inspection-Report@adeq.state.ar.us](mailto: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 documentation (i.e., photos) is due by **February 22, 2016**.


If I can be of any assistance, please contact me at [mccabe@adeq.state.ar.us](mailto:mccabe@adeq.state.ar.us) or (501) 682-0642.

Sincerely,



Kerri McCabe  
Inspector Supervisor  
Water Division

cc: John Hyde, Plant Manager, AECC – Carl E Bailey, [john.hyde@aecc.com](mailto:john.hyde@aecc.com)  
Alan Herman, Assistant Plant Manager, AECC – Carl E Bailey, [alan.herman@aecc.com](mailto:alan.herman@aecc.com)

 <b>A R K A N S A S</b> Department of Environmental Quality		<b>WATER DIVISION INSPECTION REPORT</b>				
		AFIN: 74-00024		PERMIT #: AR0000400		DATE: 1/8/2016
		COUNTY: 74 Woodruff		PDS #: 088993		MEDIA: WN
		GPS LAT: 35.261352 LONG: -91.362573 LOCATION: Entrance				
<b>FACILITY INFORMATION</b>			<b>INSPECTION INFORMATION</b>			
NAME: <b>Carl E Bailey Generating Station</b> LOCATION: <b>535 Woodruff 816</b> CITY: <b>Augusta, AR</b>			FACILITY TYPE: <b>2 - Industrial</b>	INSPECTOR ID#: <b>84022 S - State</b>		
			FACILITY EVALUATION RATING: <b>2 - Marginal</b>	INSPECTION TYPE: <b>Compliance Evaluation</b>		
			DATE(S): <b>1/8/2016</b>	ENTRY TIME: <b>10:30</b>	EXIT TIME: <b>14:00</b>	PERMIT EFFECTIVE DATE: <b>8/1/2010</b> PERMIT EXPIRATION DATE: <b>7/31/2015</b>
<b>RESPONSIBLE OFFICIAL</b>						
NAME / TITLE: <b>John Hyde / Plant Manager</b> COMPANY: <b>AECC - Carl E Bailey Generating Station</b> MAILING ADDRESS: <b>PO Box 503</b> CITY, STATE, ZIP: <b>Augusta AR 72006</b> PHONE & EXT: / FAX: <b>870-347-2524 /</b> EMAIL: <b>john.hyde@aecc.com</b>			FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>			
CONTACTED DURING INSPECTION: <b>Yes</b>			<b>INSPECTION PARTICIPANTS</b>			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>John Hyde/Plant Manager/(870) 347-2523/john.hyde@aecc.com</b> <b>Alan Herman/Assistant Plant Manager (Basic Industrial WW Lic# 011783)/alan.herman@aecc.com</b>			
<b>AREA EVALUATIONS</b>						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
<b>S</b>	PERMIT	<b>S</b>	FLOW MEASUREMENT	<b>N</b>	STORMWATER	
<b>M</b>	RECORDS/REPORTS	<b>S</b>	LABORATORY	<b>S</b>	FACILITY SITE REVIEW	
<b>S</b>	OPERATION & MAINTENANCE	<b>S</b>	EFFLUENT/RECEIVING WATER	<b>S</b>	SELF-MONITORING PROGRAM	
<b>M</b>	SAMPLING	<b>N</b>	SLUDGE HANDLING/DISPOSAL	<b>N</b>	PRETREATMENT	
<b>**</b>	OTHER:					
<b>SUMMARY OF FINDINGS</b>						
<p>The following violations were noted during the inspection:</p> <p>1.) The bench sheet for pH sampling/analyzing does not contain enough information to confirm that pH was analyzed per 40 CFR 136 requirements (i.e., holding time, duplicate sample, etc.). This is a violation of Part III, Sec C, 3 of the permit. A pH bench sheet was provided for the permittee to utilize during pH sampling.</p> <p>2.) The flow, temperature, and pH bench sheets utilized by the permittee do not contain all the information outlined in Part III, Sec C, 8, A-F of the permit. This is a violation of Part III, Sec C, 8 of the permit. The permittee needs to review Part III, Sec C, 8, A-F of the permit and incorporate any missing items onto the bench sheets. Additionally, the permittee must fill out the bench sheets completely with the required information.</p> <p>Per Regulation 6.201, the permit has continued beyond the expiration date. Permittee is in the process of permit renewal for the NPDES permit.</p>						

**GENERAL COMMENTS**

On Friday, Jan 8, 2016 inspections were conducted with the above-mentioned inspection participants. The inspections consisted of site assessments and record reviews.

**Site assessment:**

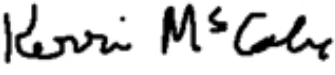

Treatment consists of taking water from the White River at intake, sending through a condenser, and discharge back to the White River at Outfall 001. Through continuous temperature monitoring, intake water can be routed to the cooling spray pond for additional cooling prior to overland flow to discharge from Outfall 001. Boiler blowdown, demineralizer generation backwash, equipment wash, building drains and service (sewage), and stormwater are routed to the retention pond for Outfall 002. The retention pond has not had a discharge in over ten years, and the outfall structure for Outfall 002 has been sealed shut. The North and South Ponds contain freshwater only.

Overall, the site was well-maintained. No spills or leaks were noted at the intake, and pond levees were free of erosion, burrowing animals, and excessive woody vegetation. There was some woody vegetation noted in the cooling spray pond.

**Records review:**

The flow and temperature sampling for Outfall 001 are measured continuously through metering, and pH is measured once/month (when discharging) via an onsite meter. The facility only samples for TRC when chlorine is added to the cooling water. Facility is an intermittent generator, and it only discharges a couple of months during the year from Outfall 001. There has not been a discharge from Outfall 002 in over ten years, and DMRs stating "No Discharge" are submitted as required.

The bench sheets for flow, temperature, and pH are incomplete (see Part III, Sec C, 8, A-F of the permit for details). Records are to be complete and contain all required information.

INSPECTOR'S SIGNATURE: 	Kerri McCabe	DATE: 2/5/2016
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 2/8/2016

<b>SECTION A: PERMIT VERIFICATION</b>	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION B: RECORDKEEPING AND REPORTING EVALUATION</b>	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <b>Permittee samples flow, temperature, and pH at Outfall 001; no discharge from Outfall 002 in over 10 years.</b>	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING: <b>No time on pH bench sheet; flow and temperature is measured continuously.</b>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING: <b>No sampler identified.</b>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES: <b>No time on pH bench sheet; flow and temperature is measured continuously.</b>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES: <b>No analyzer identified.</b>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION C: OPERATIONS AND MAINTENANCE</b>	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <b>Not a mechanical plant.</b>	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: <b>One (1) Basic Industrial</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: <b>Cooling spray pond for additional cooling.</b>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION D: SAMPLING</b>	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <b>Permittee samples for flow, temperature, and pH at Outfall 001; no discharge from Outfall 002 in over 10 years.</b>	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT: <u>Quality control pH sample taken at retention pond (does not have to be reported).</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED: <u>All instantaneous readings at Outfall 001.</u>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136: <u>pH bench sheet does not indicate "time collected/time analyzed."</u>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR: <u>Sampling pH more frequently and reporting.</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION E: FLOW MEASUREMENT</b>	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <b>Closed pipe at Outfall 001 (continuous metering); sealed pipe at Outfall 002 (no discharge).</b>	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>Y</u> TYPE OF DEVICE: <u>Closed pipe</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>Transmitter</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE: <u>Calibrated in July and Dec 2015.</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE: <u>See Sec E, #1.</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION: <u>Not an open-channel primary device.</u>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION F: LABORATORY</b>	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <b>Permittee samples for flow, temperature, pH, and TRC (when chlorine is used) for Outfall 001; Outfall 002 has not had a discharge in over ten years.</b>	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS</b>							
BASED ON VISUAL OBSERVATIONS ONLY						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
DETAILS: <b>Outfall 001 not discharging during inspection; Outfall 002 has not discharged in over ten years.</b>							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	--
002	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	NO DISCHARGE	
<b>SECTION H: SLUDGE DISPOSAL</b>							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <b>Facility does not generate sludge/solids.</b>							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): <u>N/A</u>							
<b>SECTION I: SAMPLING INSPECTION PROCEDURES</b>							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:__ <input type="checkbox"/> COMPOSITE:__ METHOD:__ FREQUENCY:							
3. SAMPLES PRESERVED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
<b>SECTION J: STORM WATER POLLUTION PREVENTION PLAN</b>							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <b>Part II, Condition #4 requires BMPs; inspected under separate IGP ARR00A437.</b>							
1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	

**DMR Calculation Check**

Reporting Period: From 2014 08 01 To 2014 08 31  
 Year Month Day Year Month Day

Parameter Checked: Flow (Outfall 001)

	Loading Mass (lbs/day) Mo Avg / Daily Max		Concentration Monthly (mg/l, unless otherwise specified) Mo Avg Daily Max	
	Reported Value:	<u>N/A</u>	<u>30.5</u>	<u>65.1</u>
Calculated Value:	<u>N/A</u>	<u>32.0</u>	<u>65.1</u>	
Permit Value:	<u>N/A</u>	<u>Report, MGD</u>	<u>120 MGD</u>	

If calculated value does not equal reported value, explain:  
(43,175 + 65,104 + 29,247 + 6,126 + 22,174 + 25,965)/6 = 191,791/6 = 31,965; SAME (rounding differences only). The unit specified on the flow bench sheet indicates MGD; however, in order to get the reported MGD on DMRs, the total must be divided by 1000. It appears that the unit reported on the bench sheet is gpd (omitting three zeros) or MGD using a comma instead of a decimal point. Operator is reporting monthly total flow on DMR, which should be 192 MGD and not 183.1 MGD as documented.

**DMR Calculation Check**

Reporting Period: From 2014 08 01 To 2014 08 31  
 Year Month Day Year Month Day

Parameter Checked: pH (Outfall 001)

	<b>Loading</b>	<b>Concentration</b>	
	<b>Mass (lbs/day)</b>	<b>Monthly (mg/l, unless otherwise specified)</b>	
	<b>Mo Avg / Daily Max</b>	<b>Minimum</b>	<b>Maximum</b>
Reported Value:	<u>N/A</u>	<u>7.98</u>	<u>8.02</u>
Calculated Value:	<u>N/A</u>	<u>7.98</u>	<u>8.02</u>
Permit Value:	<u>N/A</u>	<u>6.0 su</u>	<u>9.0 su</u>

If calculated value does not equal reported value, explain:  
SAME; pH is a logarithmic scale and should not be expressed in significant figures (rounding is not appropriate for this parameter). pH is being monitored/reported more frequently than required.

**Water Division Photographic Evidence Sheet**

Location:	<b>Carl E Bailey Generating Station</b>			
Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>	
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1253</b>	
Description:	<b>Intake structure at White River.</b>		Photo #:	<b>1</b>



Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>	
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1309</b>	
Description:	<b>Closed pipe for circulated intake water; discharges to Outfall 001 (manmade conveyance to White River).</b>		Photo #:	<b>2</b>



**Water Division Photographic Evidence Sheet**

Location:	<b>Carl E Bailey Generating Station</b>				
Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>	Time:	<b>1309</b>
Witness:	<b>John Hyde and Alan Herman</b>			Photo #:	<b>3</b>
Description:	<b>Emergency cooling pond for temperature adjustment; bypass info in permit.</b>				



Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>	Time:	<b>1309</b>
Witness:	<b>John Hyde and Alan Herman</b>			Photo #:	<b>4</b>
Description:	<b>Culvert system from spray cooling pond to manmade conveyance at Outfall 001.</b>				



**Water Division Photographic Evidence Sheet**

Location:	<b>Carl E Bailey Generating Station</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1309</b>
		Photo #:	<b>5</b>
Description:	<b>Spillway at spray cooling pond at manmade conveyance at Outfall 001.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1246</b>
		Photo #:	<b>6</b>
Description:	<b>Retention pond for Outfall 002; has not discharged in over 10 years.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>Carl E Bailey Generating Station</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1246</b>
		Photo #:	<b>7</b>
Description:	<b>Location of sealed pipe for Outfall 002.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1301</b>
		Photo #:	<b>8</b>
Description:	<b>Influent location for retention pond; PVC pipe is from demineralization tank.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>Carl E Bailey Generating Station</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1302</b>
		Photo #:	<b>9</b>
Description:	<b>Demineralization system; discharges to retention pond.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1304</b>
		Photo #:	<b>10</b>
Description:	<b>Stormwater drain that discharges to retention pond.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>Carl E Bailey Generating Station</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1318</b>
		Photo #:	<b>11</b>
Description:	<b>Stormwater drain inside transfer station that discharges to retention pond.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1318</b>
		Photo #:	<b>12</b>
Description:	<b>Onsite pack plant for domestic sewage treatment that discharges effluent to retention pond.</b>		



Water Division Photographic Evidence Sheet

Location:	Carl E Bailey Generating Station		
Photographer:	Kerri McCabe	Date:	Jan 8, 2016
Witness:	John Hyde and Alan Herman	Time:	1336
		Photo #:	13
Description:	Onsite pH meter for Outfall 001 samples and QC samples for retention pond.		



Photographer:	Kerri McCabe	Date:	Jan 8, 2016
Witness:	John Hyde and Alan Herman	Time:	1339
		Photo #:	14
Description:	pH meter manual.		



**Water Division Photographic Evidence Sheet**

Location:	<b>Carl E Bailey Generating Station</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1335</b>
Description:	<b>pH buffers for two-point calibration; buffer 10.01 expires April 2016.</b>		

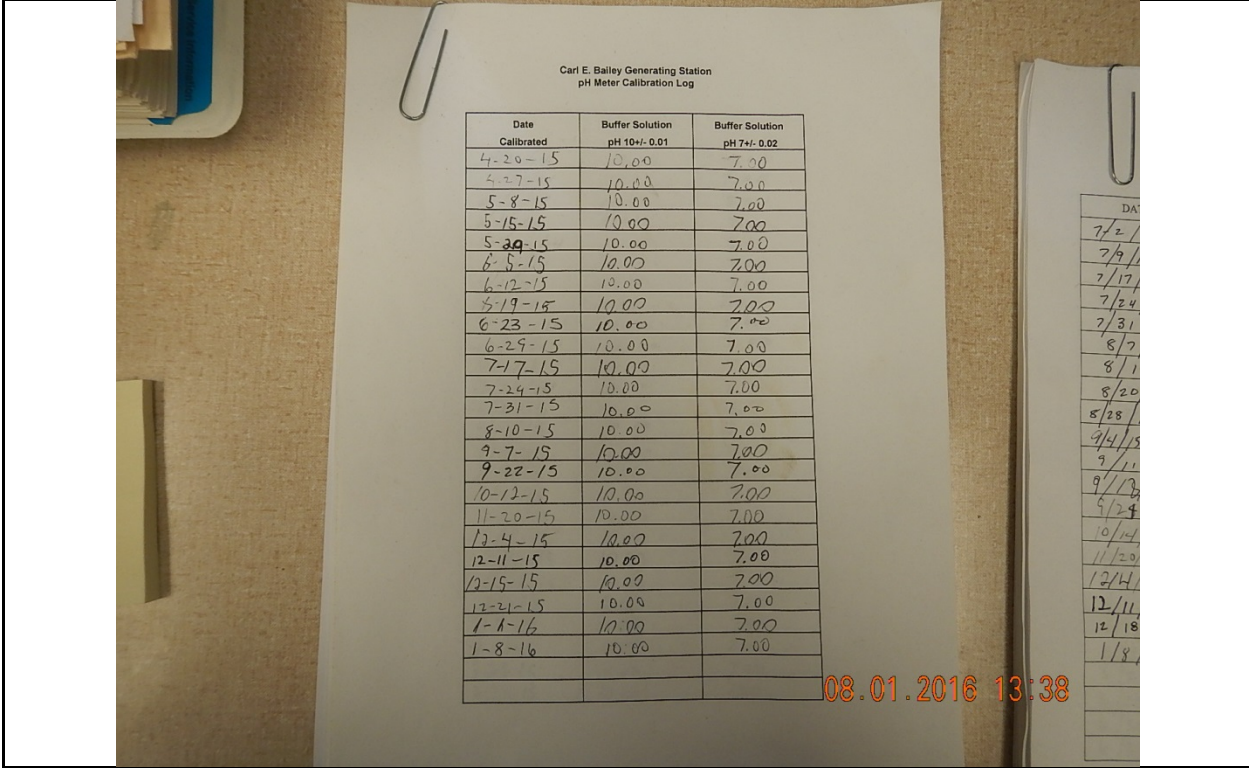


Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1336</b>
Description:	<b>Unlabeled buffer standards; need to be identified and dated.</b>		



**Water Division Photographic Evidence Sheet**

Location:	<b>Carl E Bailey Generating Station</b>		
Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1338</b>
		Photo #:	<b>17</b>
Description:	<b>pH calibration sheet; refer to Part III, Sec C, 8, A-F of the permit for complete info required.</b>		



Photographer:	<b>Kerri McCabe</b>	Date:	<b>Jan 8, 2016</b>
Witness:	<b>John Hyde and Alan Herman</b>	Time:	<b>1338</b>
		Photo #:	<b>18</b>
Description:	<b>pH bench sheet; refer to Part III, Sec C, 8, A-F of the permit for complete info required.</b>		

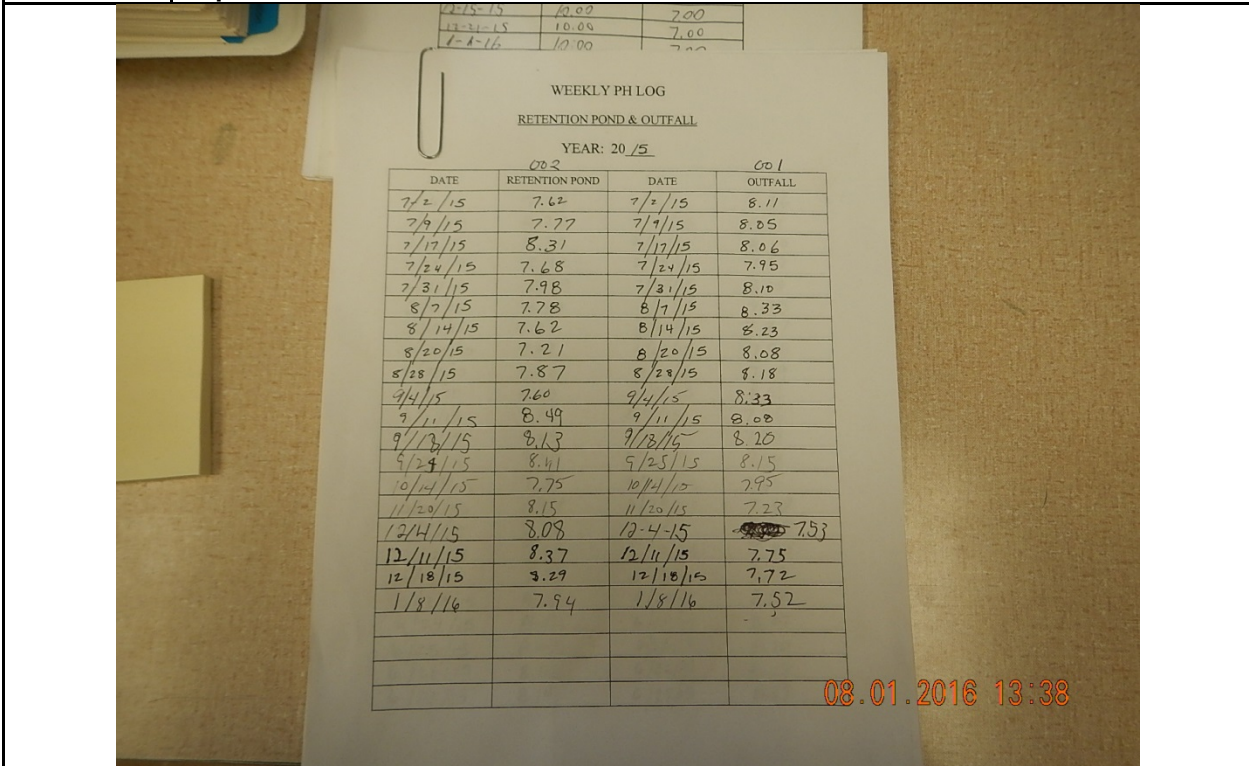


Figure 1. Google Earth image dated May 5, 2014 of the AECC - Carl E Bailey WWTP and surrounding structures.



**From:** McCabe, Kerri  
**To:** ["john.hyde@aecc.com"](mailto:john.hyde@aecc.com); ["alan.herman@aecc.com"](mailto:alan.herman@aecc.com)  
**Cc:** [Solaimanian, Jamal](#)  
**Subject:** AECC - Carl E Bailey Inspections (Woodruff Co)  
**Date:** Monday, February 01, 2016 9:58:00 AM  
**Attachments:** [AR0000400\\_pH\\_Sheet.xlsx](#)  
[outfall\\_modification\\_form.pdf](#)  
[image001.png](#)

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John and Alan,

I meant to send you a follow-up email after the inspections, but I got busy. Anyway, I have included a sheet I have developed for keeping up with pH calibration, sampling, and analysis. Please be advised, the permit requires pH to be sampled once/month for Outfall 001. This will need to include a duplicate reading, which is not reported on DMRs. If you sample pH more frequently, you are to report it on DMRs. The lowest value goes in "Minimum" and the highest value goes in "Maximum."

#### **AR0000400**

No concerns with the treatment system for Outfalls 001 or 002. Did note some woody vegetation in the cooling spray pond, but you appear to be managing that at a frequency that meets your needs. I am still reviewing the records for this permit.

#### **ARR00A437**

There were some items that have not met "minimizing exposure." Particularly, uncovered materials around the yard and bulk fuel tanks outside containment. The area is very organized, but the potential for exposure to pollutants to stormwater exists.

The outfall is not accurate on the NOI. It is accurate in the SWPPP; however, this location is not representative of site stormwater runoff. After speaking with Jamal Solaimanian in the Permits Branch, we are in agreement that the sample should be collected as you discharge from the retention pond. This retention pond is a structural control; and to demonstrate its effectiveness, samples would need to be collected after the retention pond. This does require the SWPPP to be updated to reflect the new outfall location (submit the attached form) and how samples are to be collected (i.e., it will not be collected as described in the permit because you can control the release; not within 30 minutes of a storm event, etc.). I am still reviewing records for this general permit.

If you have any questions, please feel free to contact me. Your reports will be submitted for review by the end of the week. I enjoyed working with both of you during the inspections. Thank you.

### **Kerri McCabe**

Inspector Supervisor  
ADEQ – Water Division  
Field Services – Inspection Branch

Office – (501) 682-0642  
Work Cell – (501) 352-5641  
Fax – (501) 682-0880  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

ADEQ Logo



# pH Sheet

Arkansas Electric Coop Corp - Carl E Bailey Generating Station  
AR0000400

Sample Frequency/Type (Part I, Sec A) = once/month (when discharging)/grab

pH meter (Make/Model) = \_\_\_\_\_

Month/Year \_\_\_\_\_

## pH Calibration

Date	Time		pH Buffer Reading (su)			Bu
			4	7	10	
		BEFORE				
		AFTER				

Notes: \_\_\_\_\_  
\_\_\_\_\_

## pH Sample Collection Record

Date	Time	Location	Initial

Notes: \_\_\_\_\_  
\_\_\_\_\_

## pH Sample Analysis Record

Date	Time	pH Reading (su)	Duplicate (su)	Initial	Method

Notes: \_\_\_\_\_  
\_\_\_\_\_

Signature \_\_\_\_\_  
Date \_\_\_\_\_

ffer Info

Expiration Date    Efficiency Reading (%)    Initial

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## McCabe, Kerri

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**From:** Stephen Cain <Stephen.Cain@aecc.com>  
**Sent:** Monday, February 22, 2016 2:32 PM  
**To:** Water-Inspection-Report  
**Cc:** McCabe, Kerri; Lori L. Burrows; Jonathan Oliver; Steve Metcalf; Curtis Warner; John Hyde; Alan Herman  
**Subject:** AECC Response to ADEQ Inspection Ltr for Bailey Gen Station (AFIN: 74-00024)  
**Attachments:** AECC Response to Jan 2016 Bailey Inspection Ltr.pdf

Please find attached Arkansas Electric Cooperative Corporation's response to an ADEQ water inspection letter dated February 8, 2016 addressed to the referenced facility.

Stephen Cain  
Manager – Environmental Compliance  
Arkansas Electric Cooperative Corporation  
501.570.2420



# Arkansas Electric Cooperative Corporation

**Reliable • Affordable • Responsible**

1 Cooperative Way  
P.O. Box 194208  
Little Rock, Arkansas 72219-4208  
(501) 570-2200

February 22, 2016

Water Division – Inspection Branch  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

RE: Response to Summary of Findings Letter  
Carl E. Bailey Generating Station AFIN: 74-00024  
NPDES Permit Nos. AR0000400 and ARR00A437

To Whom It May Concern:

This letter is written in response to Ms. Kerri McCabe's letter dated February 8, 2016. Ms. McCabe performed an NPDES permit inspection at the referenced facility on January 8, 2016. Ms. McCabe's letter includes her inspection reports with a summary of findings noted during the inspection.

AECC's responses are separated into the following two sections:

- Section 1: AECC's responses to the inspection report for Permit No. AR0000400; and
- Section 2: AECC's responses to the inspection report for Permit No. ARR00A437.

## **Section 1**

Below are Arkansas Electric Cooperative Corporation's (AECC) responses to the inspection report for Permit No. AR0000400.

### **Finding 1**

*The bench sheet for pH sampling/analyzing does not contain enough information to confirm that pH was analyzed per 40 CFR 136 requirements (i.e., holding time, duplicate sample, etc.). This is a violation of Part III, Sec C, 3 of the permit. A pH bench sheet was provided for the permittee to utilize during pH sampling.*

### **Response 1**

AECC received the pH bench sheet via email from Ms. McCabe on February 1, 2016 and began using the sheet and required practices that same week. AECC plans to continue use of the sheet and required practices going forward.

A copy of the completed bench sheet for a pH analysis taken on February 5, 2016 is in Appendix A.

### **Finding 2**

*The flow, temperature, and pH bench sheets utilized by the permittee do not contain all the information outlined in Part III, Sec C, 8, A-F of the permit. This is a violation of Part III, Sec C, 8 of the permit. The permittee needs to review Part III, Sec C, 8, A-F of the permit and incorporate any missing items onto the bench sheets. Additionally, the permittee must fill out the bench sheets completely with the required information.*

### **Response 2**

AECC began using the new bench sheet referenced in Response 1 above during the week of February 1. This sheet includes all of the information that is listed in Part III, Sec. C, 8, A-F of the permit.

Regarding the flow and temperature bench sheet, AECC has added items to the existing sheet to meet the requirements of Part III, Section C, 8, A-F. This updated sheet is attached in Appendix B.

### **Additional Finding**

*Per Regulation 6.201, the permit has continued beyond the expiration date. Permittee is in the process of permit renewal for the NPDES permit.*

### **Response to Additional Finding**

The permit expiration date was July 31, 2015. The renewal application was received by ADEQ on January 20, 2015 which met the requirement of submitting the renewal application 180 days prior to the expiration date as per Part III, Section D, 10 of the permit.

**From the General Comments:** *On Friday, Jan 8, 2016 inspections were conducted with the above-mentioned inspection participants. The inspections consisted of site assessments and record reviews.*

*Site assessment:*

*Treatment consists of taking water from the White River at intake, sending through a condenser, and discharge back to the White River at Outfall 001. Through continuous temperature monitoring, intake water can be routed to the cooling spray pond for additional cooling prior to overland flow to discharge from Outfall 001. Boiler blowdown, demineralizer generation backwash, equipment wash, building drains and service (sewage), and stormwater are routed to the retention pond for Outfall 002. The retention pond has not had a discharge in over ten years, and the outfall structure for Outfall 002 has been sealed shut. The North and South Ponds contain freshwater only.*

*Overall, the site was well-maintained. No spills or leaks were noted at the intake, and pond levees were free of erosion, burrowing animals, and excessive woody vegetation. There was some woody vegetation noted in the cooling spray pond.*

*Records review:*

*The flow and temperature sampling for Outfall 001 are measured continuously through metering, and pH is measured once/month (when discharging) via an onsite meter. The facility only samples for TRC when chlorine is added to the cooling water. Facility is an intermittent generator, and it only discharges a couple of months during the year from Outfall 001. There has not been a discharge from Outfall 002 in over ten years, and DMRs stating "No Discharge" are submitted as required.*

*The bench sheets for flow, temperature, and pH are incomplete (see Part III, Sec C, 8, A-F of the permit for details). Records are to be complete and contain all required information.*

**AECC Response**

AECC appreciates Ms. McCabe's observation that: "Overall, the site was well-maintained."

Regarding chlorine, this facility currently has no equipment that can inject chlorine into the cooling water; therefore, the requirement to sample for chlorine when added does not apply to this facility. As a result, AECC has requested that this requirement be removed from the permit as part of the current permit renewal process.

Other items are addressed in Responses 1 and 2 above.

**Section 2**

Below are AECC's responses to the inspection report for Permit No. ARR00A437.

### **Storm Water Finding 1**

*There are miscellaneous storage piles located on the facility grounds. Personnel are working to clean the area of exposed materials when time permits. These materials are uncovered and not in containment. This is a violation of Part 3, 3.1.1 of the general permit. These areas need to be added to the facility's Site Map.*

### **Storm Water Response 1**

As noted in the report, AECC is in the process of cleaning this area of exposed materials. Some of the materials have been moved to a location between the cooling spray pond and main boiler which drains to the retention pond. A photo showing these items is in Appendix C. The site map in the SWPPP has been updated to show the location of material that is uncovered and not in containment. The updated site map is in Appendix D.

### **Storm Water Finding 2**

*The SWPPP contains an outline of Employee Training; however, there was no documentation of the training occurring at the frequency specified in the SWPPP. This is a violation of Part 3, 3.1.8 of the general permit.*

### **Storm Water Response 2**

While Part 3, 3.1.8 of the general permit does not require documentation of training, AECC does document monthly general safety meetings as well as annual SWPPP training. In the referenced section of the permit, ADEQ recommends that storm water pollution prevention training be performed at least annually. Annual training was performed at Bailey on June 16, 2015 and is scheduled to occur again on March 15, 2016.

Documentation of the 2015 annual storm water pollution prevention training is in Appendix E.

### **Storm Water Finding 3**

*The coordinates for the stormwater outfall on the NOI do not match the coordinates noted in the SWPPP. The permittee needs to submit an Outfall Modification Form to the Department.*

### **Storm Water Response 3**

The storm water sampling point will be moved to the outfall of the storm water detention area discussed in Storm Water Finding 4 below. AECC will submit the form as requested and update the SWPPP with the new location of the storm water sampling point.

#### **Storm Water Finding 4**

*The permittee is sampling prior to a structural control measure (stormwater retention pond). The purpose of implementing structural controls is to reduce pollutants from entering waters of the State; and to determine their effectiveness, samples should be taken after implemented structural controls. Also, the permittee notes this in the 2014 Annual Report. This is a violation of Part 3, 3.8.2 of the general permit. Samples are to be representative of the nature and volume of the monitored discharge. Sampling procedures outlined in Part 3, 3.8.2.1, 3.8.2.2, 3.8.2.3, and 3.8.2.5 can be amended to reflect actual site conditions since the structural control (stormwater retention pond) has a control mechanism (valve) for a point-source (pipe) discharge. Sampling procedures and outfall location will need to be updated in the SWPPP.*

#### **Storm Water Response 4**

AECC has made the changes necessary in the SWPPP to reflect the updated sampling procedure to sample the discharge from the storm water detention area at Bailey.

AECC agrees that sampling from the pond is an appropriate measure but has always interpreted the permit to require that a storm water sample must be taken during a storm water discharge due to a rain event. AECC requested guidance on this during the 2009 industrial general permit (IGP) renewal process. Until now AECC's only known option was to comply with what was written in the IGP—to sample during a rain event. Therefore, AECC has always sampled the storm water going into the pond during a rain event.

#### **Storm Water Finding 5**

*During the review of pH calibration, sampling, and analyzing; it was noted that the permittee is not including enough information on bench sheets to demonstrate that the holding time for pH is being met per 40 CFR 136. This is a violation of Part 3, 3.8.2.4 of the general permit. The permittee was provided a pH bench sheet to utilize.*

#### **Storm Water Response 5**

AECC received the pH bench sheet via email from Ms. McCabe on February 1, 2016 and began using the sheet and required practices that same week. (A copy of the completed bench sheet for a pH analysis taken on February 5, 2016 is in Appendix A.) AECC plans to continue use of the sheet and required practices going forward.

**From the General Comments:** *On Friday, Jan 8, 2016 an Industrial Stormwater Inspection was conducted with the above-mentioned inspection participants. The inspection consisted of a site assessment and records review of the general permit.*

*Site assessment:*

*Potential pollution concerns that are exposed to stormwater consist of bulk fuel storage for use at generation station (inside secondary containment); bulk fuel, chemical, and waste storage for vehicles/equipment (some outside secondary containment), and stacked materials used during industrial process (uncovered). Personnel indicated that they are continuously working on cleaning the grounds of the stored, uncovered materials, and that some items have been at the plant for many years. Overall, the site was well-maintained.*

*It was uncertain if tanks stored outside secondary containment were double-walled. Fuel/chemical storage tanks are to be contained or double-walled to prevent contents from being released to the environment. Spill kits are to be located in areas where spills are likely to occur. The bulk fuel storage area utilized for electricity generation is within secondary containment, and stormwater can be discharged in a controlled manner (look for visible sheen on surface of water prior to releasing stormwater from containment).*

*Any stormwater exposed to the industrial activity flows on the site to enter either the retention pond covered under NPDES permit AR0000400 or a smaller retention pond that receives stormwater only. Permittee is collecting stormwater prior to entering the stormwater retention pond. After speaking with Jamal Solaimanian, Permits Branch Engineer Supervisor, it was determined that this retention pond is a control measure utilized for settling, and the yearly sample should be collected from the outfall pipe during discharge after the retention pond (structural control). The permittee's 2014 Annual Report acknowledges the stormwater retention pond as a BMP and that samples are collected prior to the retention pond. The SWPPP and outfall will need to be updated to reflect new sampling procedures and outfall. The permittee expressed concerns with possible turbidity associated from a "first" discharge because the pipe lies on the bottom of the stormwater retention pond; however, bench mark exceedances are not violations and allow the permittee to implement corrective actions to reduce pollution. The permittee has exceeded iron several times, and the stormwater retention pond could possibly correct this parameter by allowing settling and oxidization as iron-laden stormwater could be coming from metal storage piles, equipment, and the railroad tracks located at the facility. The permittee is contributing the iron in the stormwater to iron in soil (natural background); however, this would be more acceptable if there was exposed soil at the facility. This is not the case.*

*Records review:*

*SWPPP is well-organized; however, permittee is saving some items (i.e., inspections, sample results, etc.) on a computer and not with the SWPPP. The SWPPP and all supporting documents need to be kept in their entirety with three (3) years of records being made available for review. If kept electronically, this should be noted in the SWPPP (see Part 5, 5.2.1). Inspections, Chains of Custody, lab analyses sheets, SWAR, etc. were all complete.*

*The only documentation not found with the SWPPP was for Employee Training. There are no actual records of this training being conducted at the frequency specified in the SWPPP.*

*Permittee samples pH onsite utilizing a pH meter (TSS and Total Iron contracted). pH sampling/analyzing were reviewed during the individual NPDES permit review. Permittee was supplied a pH bench sheet to keep better track of pH calibration, sampling, and analyzing.*

### **AECC Response**

AECC appreciates Ms. McCabe's observation that: "Overall, the site was well maintained."

There is a used oil tank outside of the containment area which will no longer be used. AECC will either replace that tank with a double-walled tank or fill 55-gallon drums with used oil and store those drums inside the main building.

Regarding the benchmark exceedances for iron, while AECC maintains that the natural background concentration of iron contributed to those exceedances, AECC believes that continued removal of exposed materials and the new procedure to sample the outfall of the detention area should help prevent future iron benchmark exceedances.

Regarding the SWPPP records, language in Bailey's SWPPP indicates that sampling and AECC inspection records are "Located here or in plant environmental files." Although AECC does not specify that some of these files are electronic, the following language will be added to the SWPPP to clarify compliance with Part 5, 5.2.1 of the IGP: "Electronic files will be kept in the Cooperative Content Management System (or CCMS)."

Regarding training records, AECC does not interpret the IGP to require documentation of training. However, documentation of the 2015 training is included in Appendix E and is available in the plant's electronic records.

This concludes AECC responses. Please contact me at [stephen.cain@aecc.com](mailto:stephen.cain@aecc.com) or 501.570.2420 if you require additional information.

Sincerely,



Stephen Cain  
Manager – Environmental Compliance

**Appendix A**  
**Updated pH Bench Sheet**

# pH Sheet

Arkansas Electric Coop Corp - Carl E Bailey Generating Station  
AR0000400

Sample Frequency\Type (Part I, Sec A) = once/month (when discharging) /grab

pH meter (Make/Model) Exttech/Oyster 10 Month/Year FEBRUARY, 2016

## pH Calibration

Date	Time		7	10
2-5-16	10:27 a.m.	Before	7.13	10.21
		After	6.98	10.00

## Buffer Information

Open Date	Exp. Date	Efficient %
2-5-16	Apr 17	99.3
	Initial:	E.T.

Notes: \_\_\_\_\_

## pH Sample collection Record

Date	Time	Location	Initial
2-5-16	10:22 a.m.	Outfall	E.T.
2-5-16	3:11 p.m.	Retention Pond	E.T.

Notes: \_\_\_\_\_

## pH sample Analysis Record

	Date	Time	pH Reading (su)	Duplicate (su)	Initial	Method
Outfall	2-5-16	10:31 a.m.	7.93	7.87	E.T.	Grab
Retention Pond	2-5-16	3:17 p.m.	8.57		E.T.	Grab

Notes: \_\_\_\_\_

Signature: *Eric Lipp*

Date: 2-5-16

**Appendix B**  
**Updated Flow and Temperature Bench Sheets**

**NPDES Permit AR0000400 Monthly Totals 2016**

January

Once-Through Cooling Water			Retention Pond		
Date	Daily Flow (1,000 GPD)	Max Temp (F)	pH	Date	pH
1				1	
2				2	
3				3	
4				4	
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23				23	
24				24	
25				25	
26				26	
27				27	
28				28	
29				29	
30				30	
31				31	

Max Flow (MGD)	Max Temperature (F)	Min pH	Min pH
0	0	0	0
Average Flow (MGD)	Max pH	Max pH	Max pH
#DIV/0!	0	0	0

1. Continuous cooling water flow measurements are taken just upstream of the condenser.
2. Continuous cooling water discharge temperature measurements are taken at Outfall 001.
3. pH sampling info on pH bench sheets.

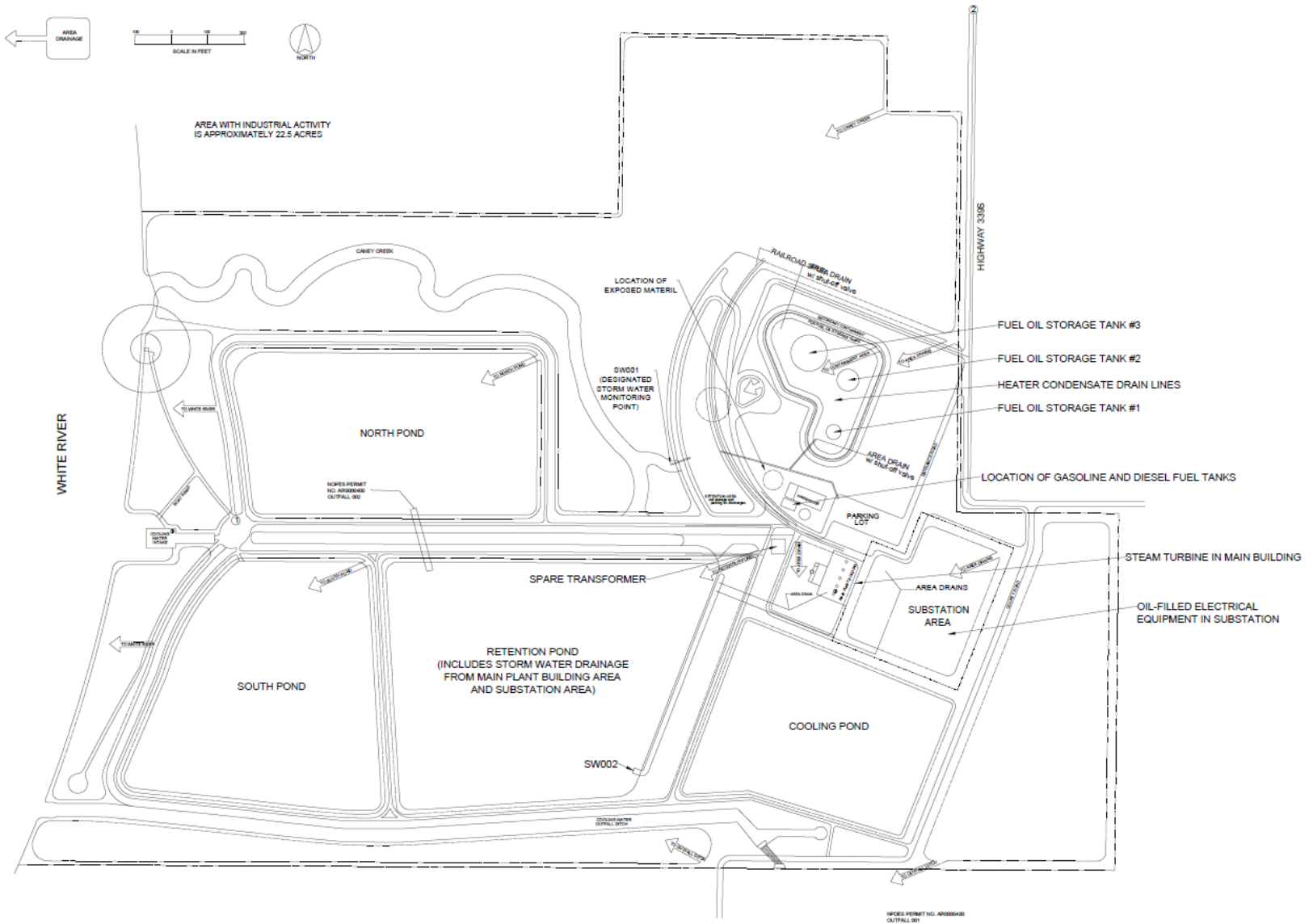
**Appendix C**  
**Photo Showing New Location of Material**



**Materials moved to a location between the cooling spray pond and the main boiler which drains to the retention pond. The retention pond can be seen in the background.**

**Appendix D**  
**Updated SWPPP Site Map**

CARL E. BAILEY GENERATING STATION



SPDES PERMIT NO. A9000040  
OUTFALL 001

**Appendix E**  
**Documentation of Annual SWPPP Training**



# ADEQ

ARKANSAS  
Department of Environmental Quality

February 23, 2016

John Hyde, Plant Manager  
AECC - Carl E Bailey Generating Station  
PO Box 503  
Augusta, AR 72006

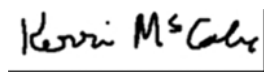
**RE: Response to Inspections – AECC Carl E Bailey (Woodruff Co)**  
**AFIN: 74-00024** **NPDES Permit No.: AR0000400**  
**ARR00A437**

Dear Mr. Hyde:

I have reviewed the response pertaining to my January 8, 2016 inspections of the Carl E Bailey Generating Station facility. The information provided sufficiently addresses the violations referenced in my inspection reports. At this time, the Department has no further comment concerning these particular inspections. 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 (501) 682-0642 or you may e-mail me at [mccabe@adeq.state.ar.us](mailto:mccabe@adeq.state.ar.us).

Sincerely,



Kerri McCabe  
Inspector Supervisor  
Water Division

cc: John Hyde, Plant Manager, AECC – Carl E Bailey, [john.hyde@aecc.com](mailto:john.hyde@aecc.com)  
Alan Herman, Assistant Plant Manager, AECC – Carl E Bailey,  
[alan.herman@aecc.com](mailto:alan.herman@aecc.com)

**From:** [McCabe, Kerri](#)  
**To:** [Stephen Cain](#); [Water-Inspection-Report](#)  
**Cc:** [Lori L. Burrows](#); [Jonathan Oliver](#); [Steve Metcalf](#); [Curtis Warner](#); [John Hyde](#); [Alan Herman](#)  
**Subject:** RE: AECC Response to ADEQ Inspection Ltr for Bailey Gen Station (AFIN: 74-00024)  
**Date:** Monday, February 22, 2016 2:55:35 PM  
**Attachments:** [image001.png](#)

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Mr. Cain,

Let this email serve as confirmation that I have received AECC's response to the findings of my inspections. I have reviewed the response and deem it adequate. I will send a formal letter to AECC by the end of the week. Thank you.

## **Kerri McCabe**

Inspector Supervisor  
ADEQ – Water Division  
Field Services – Inspection Branch

Office – (501) 682-0642  
Work Cell – (501) 352-5641  
Fax – (501) 682-0880  
5301 Northshore Drive  
North Little Rock, AR 72118-5317



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**From:** Stephen Cain [mailto:Stephen.Cain@aecc.com]  
**Sent:** Monday, February 22, 2016 2:32 PM  
**To:** Water-Inspection-Report  
**Cc:** McCabe, Kerri; Lori L. Burrows; Jonathan Oliver; Steve Metcalf; Curtis Warner; John Hyde; Alan Herman  
**Subject:** AECC Response to ADEQ Inspection Ltr for Bailey Gen Station (AFIN: 74-00024)

Please find attached Arkansas Electric Cooperative Corporation's response to an ADEQ water inspection letter dated February 8, 2016 addressed to the referenced facility.

Stephen Cain  
Manager – Environmental Compliance  
Arkansas Electric Cooperative Corporation  
501.570.2420