

ADEQ

ARKANSAS
Department of Environmental Quality

August 24, 2017

Mr. **David Frasher**, City Manager
City of Hot Springs
133 Convention Blvd.
Hot Springs, AR 71901

RE: Hot Springs POTW Inspections (Garland Co)
AFIN: 26-00145 **NPDES Permit No.: AR0033880**

Dear Mr. Frasher:

On July 17 and 18, 2017, I performed a Compliance Evaluation Inspection, a Compliance Sampling Inspection, and a SSO/Collection System 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.


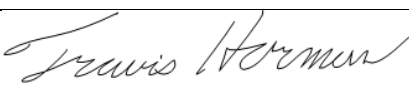
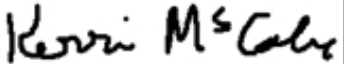
Please refer to the “Summary of Findings” section of each of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. 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 **September 7, 2017**.

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

Sincerely,



Travis Harmon
District 5 Field Inspector
Water Division

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 26-00145		PERMIT #: AR0033880		DATE: 7/17/2017
COUNTY: 26 Garland			PDS #: 098721		MEDIA: WN	
GPS LAT: 34.450316 LONG: -93.019033 LOCATION: General Area						
FACILITY INFORMATION				INSPECTION INFORMATION		
NAME: Hot Springs POTW LOCATION: 320 Davidson Drive CITY: Hot Springs, AR 71902				FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 34689 S - State
RESPONSIBLE OFFICIAL NAME: / TITLE Mr. David Frasher / City Manager COMPANY: City of Hot Springs MAILING ADDRESS: 133 Convention Blvd. CITY, STATE, ZIP: Hot Springs AR 71901 PHONE & EXT: / FAX: 501-321-6811 / 501-321-6814 EMAIL: dfrasher@cityhs.net jsorrells@cityhs.net CONTACTED DURING INSPECTION: No				FACILITY EVALUATION RATING: 4 - Satisfactory		INSPECTION TYPE: Compliance Evaluation
				DATE(S): 7/17/2017	ENTRY TIME: 09:30	EXIT TIME: 13:30
				FAYETTEVILLE SHALE RELATED: N		
				FAYETTEVILLE SHALE VIOLATIONS: N		
INSPECTION PARTICIPANTS						
NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Jim Sorrells/ C.O., Facility Operations Mgr./ 501-262-1881 Harold Mauldin/ Lab/ 501-262-1881						
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
S	PERMIT	M	FLOW MEASUREMENT	N	STORMWATER	
S	RECORDS/REPORTS	S	LABORATORY	S	FACILITY SITE REVIEW	
S	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM	
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT	
N	OTHER:					
SUMMARY OF FINDINGS						
1. The effluent flowmeter was last calibrated in June 2015. This is a violation of Part III.C.3 of the permit. The effluent flowmeter should be calibrated no less than annually. Per a conversation with Operator Gordon Yates on August 18, 2017, the facility is currently preparing a work order to have the meter calibrated.						
GENERAL COMMENTS						
I inspected on July 17, 2017. Mr. Jim Sorrells represented the facility. We first conducted a facility tour viewing each stage of treatment. I then reviewed required records and obtained sample data for the month of April 2017 for DMR calculation review. I reviewed DMR via NetDMR for May 2017 through June 2017 prior to the inspection. The facility had no exceedances during this period. I then met with Mr. Harold Mauldin with the facility laboratory. I collected grab samples that afternoon and then inspected lab sheets and equipment. I returned on July 18, 2017 to collect composite samples and delivered to the ADEQ laboratory for analysis. Also, the facility is currently operating under CAO LIS-08-099, which requires improvements to the collection system. The facility should continue to submit reports to the Enforcement Branch and implement corrective actions required by the CAO.						
INSPECTOR'S SIGNATURE:  Travis Harmon				DATE: 8/21/2017		
SUPERVISOR'S SIGNATURE:  Kerri McCabe				DATE: 8/23/2017		

SECTION A: PERMIT VERIFICATION	
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
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
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 checked="" 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:	<input checked="" type="checkbox"/> Y <input 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:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input 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:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input 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 checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION C: OPERATIONS AND MAINTENANCE	
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: Screening, grit chamber, primary clarification, activated sludge, secondary clarification, sand filtration, chlorine disinfection, dechlorination, anaerobic sludge digestion, gravity thickening, and sludge composting. Note: at time of inspection, plant had secondary units (side-by-side units) down for maintenance and cleaning during summer low-flow conditions.	
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:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input 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:	<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 checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<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

SECTION D: SAMPLING	
PERMITTEE SAMPLING 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:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input 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:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT 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:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: <u>4 ft. Parshall flume</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>Siemens Milltronics OCM III</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input type="checkbox"/> Y <input checked="" 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<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:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <u>In-house lab</u>	
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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input 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

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS							
BASED ON VISUAL OBSERVATIONS ONLY						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <u>Viewed at flume.</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						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <u>Sludge is treated in digester, pressed, and then composted.</u>							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):							
SECTION I: SAMPLING INSPECTION PROCEDURES							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <u>CSI conducted July 17, 2017 (pH, DO, TRC) and July 18, 2017 (CBOD, TSS, NH3-N, TP, Nitrate + Nitrite). Results were within permitted limits; separate CSI report prepared.</u>							
1. SAMPLES OBTAINED THIS INSPECTION:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input checked="" type="checkbox"/> GRAB: <u>pH, DO, TRC</u> <input checked="" type="checkbox"/> COMPOSITE: <u>CBOD, TSS, TP</u> METHOD: <u>Listed on lab analysis</u> FREQUENCY: <u>Daily & once/month (NO3+NO2)</u>							
3. SAMPLES PRESERVED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
SECTION J: STORM WATER POLLUTION PREVENTION PLAN							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
DETAILS: <u>Facility has obtained coverage under IGP ARR000059 and operates under the No-Exposure exclusion.</u>							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	

FLOW CALCULATION SHEET

Date: **July 17, 2017** Time: **1005**

Head in Inches: **11.75** Feet: **0.98**

Type & Size of Primary Flow Measurement Device: **4 ft. Parshall Flume**

Name & Model of Secondary Flow Measurement Device: **Siemens Milltronics OCM III**

Date of last Calibration of Secondary Flow Device: **June 2015**

Recorded Flow at Date & Time Listed Above: **10.64 MGD** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **10.02 MGD**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

% Error =	Recorded Value	-	Calculated Value	X 100
	Calculated Value			

% Error =	10.64	-	10.02	X 100
	10.02			

% Error =	0.62	X 100
	10.02	

% Error =	0.0618	X 100
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% Error =	6.9	%
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Comments:

DMR Calculation Check

Reporting Period: From 17 4 1 To 17 4 30
 Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>459</u>	<u>3.58</u>	<u>3.61</u>
Calculated Value:	<u>458.8</u>	<u>3.578</u>	<u>3.614</u>
Permit Value:	<u>1500</u>	<u>15</u>	<u>22.5</u>

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period: From 17 4 1 To 17 4 30
 Year Month Day Year Month Day

Parameter Checked: TP

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>65.4</u>	<u>0.58</u>	<u>0.89</u>
Calculated Value:	<u>65.33</u>	<u>0.58</u>	<u>0.89</u>
Permit Value:	<u>100.1</u>	<u>Report</u>	<u>Report</u>

If calculated value does not equal reported value, explain:

Water Division Photographic Evidence Sheet

Location:	Hot Springs POTW		
Photographer:	Travis Harmon	Date:	7/17/17
Witness:	Mr. Jim Sorrells	Time:	1000
Photo #:	1		
Description:	One of two chlorine contact chambers down for future construction of UV system.		



Photographer:	Travis Harmon	Date:	7/17/17
Witness:	Mr. Jim Sorrells	Time:	1002
Photo #:	2		
Description:	View of final effluent at flume; appears sufficiently treated.		



From: [McCabe, Kerri](#)
To: [McConnell, Melissa](#)
Cc: [Harmon, Travis](#)
Subject: FW: Response to ADEQ inspection July 17-18-2017
Date: Wednesday, September 06, 2017 7:44:12 AM
Attachments: [image001.png](#)
[doc03575320170906073916.pdf](#)
[image002.png](#)

Melissa,

Please attach this email and attachment to WIDs 22872 and 22874. 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



From: James Sorrells [<mailto:JSorrells@cityhs.net>]
Sent: Wednesday, September 06, 2017 7:34 AM
To: McCabe, Kerri; Harmon, Travis
Cc: Monty Ledbetter; Bobby Harris; Gordon Yates
Subject: Response to ADEQ inspection July 17-18-2017

Response to AR0033880 wwtp, and collection system inspection 7/17-18/2017

James B. Sorrells

WW Operations Manager
City of Hot Springs
(501) 262-1125



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NON-COMPLIANCE REPORT

Arkansas Department of Environmental Quality
NPDES Enforcement Section
5301 Northshore Drive
North Little Rock, AR 72118

RE: NPDES Permit No: AR0033880 Discharge Number: 001A

Facility: Hot Springs City of WWTP

Address: 320 Davidson Dr

City: Hot Springs State: AR Zip: 71901

Contact: James Sorrells Phone: 1-501-262-1125 Ext 10

Non Compliance Inspection of collection system: the lid at lakeside station was pulled and repaired 7 20-2017

Non Compliance: The last quarter of 2016 a failure to have Flowmeter calibrated on time

We fill this problem was due to:

Oversite, due to confusion on who is supposed to contact vendor for calibrations of COHS flow meters.

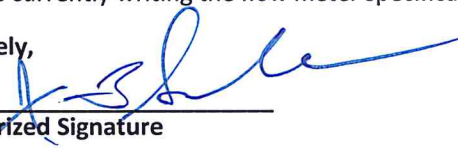
We plan on correcting the problem in this manner:

We have had the meters calibrated to date, and are planning on giving a contract to one vendor for three to five years, along with pop up reminders on our computers.

Time estimated that it will take to correct problem:

We have already had meters calibrated for the Regional Plant AR0033880, SWWWTP AR0050148.
We are currently writing the flow meter specification's contract to put out for bid.

Sincerely,



Authorized Signature

9-6-2017

Date

CALIBRATION & CONTROLS, INC.

1156 Salem Road
Benton, AR. 72019
501 316 3285

DATE: 8-29-17

LOCATION: Hot Springs WWTP

Calibration & Certification Report

CALIBRATION TECH: Jeff Porterfield

Company		Site	
Manufacturer	SIEMENS	Tag or ID	KFP LUMONT Flow METER
Model Number	6CM III	Serial Number	N/A

Calibrated Range/Span

	Span	Eng. Unit	Accuracy +/-	Tolerance +/-	Eng. Unit
Input	0	28.29 "H ₂ O	2% R.S.	56 "H ₂ O	"H ₂ O
Output	0	40.03 MGD	2% R.S.	80 MGD	MGD

Calibration Data

As Found					As Left	
Input	Output	Output	Output	Output	Output	Output
%	Actual	Desired	Actual	Error +/-	Actual	Error +/-
0.0						
25.0						
50.0	10.83	9.02	9.03	1.01	9.03	
75.0						
100.0						
75.0						
50.0						
25.0						
0.0						

Measuring & Test Equipment

Type	Name	Model #	Serial #	Calb. Due Date
STAFF Gauge	Flow Chart			

Special Conditions or Comments

CALIBRATE AT Flow

Certification

Frequency	Calibration Date	Inspector Signature
YEARLY	8-29-17	Jeff Porterfield

This document certifies the above named equipment has been inspected and tested against the listed field standards. These standards are Certified and traceable to the National Institute of Standards Technology. Copies of Field Standards Certifications will be supplied upon request.

CALIBRATION & CONTROLS, INC.

DATE: 8-29-17

1156 Salem Road
Benton, AR. 72019
501 316 3285

LOCATION: Hot Springs WWT

Calibration & Certification Report

CALIBRATION TECH: Jeff Porterfield

Company		Site	<u>Influent Structure</u>
Manufacturer	<u>SIEMENS</u>	Tag or ID	<u>INFLUENT Flow METER</u>
Model Number	<u>OCM III</u>	Serial Number	

Calibrated Range/Span

	Span	Eng. Unit	Accuracy +/-	Tolerance +/-	Eng. Unit
Input	<u>0</u>	<u>30</u>	<u>2% R</u>	<u>1.6</u>	<u>" H2O</u>
Output	<u>0</u>	<u>439</u>	<u>2% R</u>	<u>.80</u>	<u>MGD</u>

Calibration Data

As Found					As Left	
Input	Output		Output		Output	
%	Actual	Desired	Actual	Error +/-	Actual	Error +/-
0.0						
25.0						
50.0	<u>8.80/73</u>	<u>6.34</u>	<u>6.34</u>	<u>0</u>	<u>no</u>	<u>0</u>
75.0					<u>check</u>	
100.0					<u>MADG</u>	
75.0						
50.0						
25.0						
0.0						

Measuring & Test Equipment

Type	Name	Model #	Serial #	Calb. Due Date
<u>STAFF GAUGE</u>	<u>PLUG GAUGE</u>			

Special Conditions or Comments

CALIBRATE AT flow

Certification

Frequency	Calibration Date	Inspector Signature
<u>YEARLY</u>	<u>8.29-17</u>	<u>Jeff Porterfield</u>

This document certifies the above named equipment has been inspected and tested against the listed field standards. These standards are Certified and traceable to the National Institute of Standards Technology. Copies of Field Standards Certifications will be supplied upon request.



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

October 17, 2017

David Frasher, City Manager
City of Hot Springs
133 Convention Blvd
Hot Springs, AR 71901

RE: Hot Springs POTW – Response to Inspections (Garland Co)
AFIN: 26-00145 NPDES Permit No.: AR0033880

Dear Mr. Frasher:

I have reviewed the response pertaining to my July 17-19, 2017 inspections of the City of Hot Springs WWTP and collection system. 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 (479) 968-7339 extension 14 or you may e-mail me at harmont@adeq.state.ar.us.

Sincerely,

A handwritten signature in cursive script that reads "Travis Harmon".

Travis Harmon
District 5 Field Inspector
Office of Water Quality