ADEQ

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

June 27, 2019

Monty Ledbetter, Utilities Director
City of Hot Springs POTW
780 Adams Street
Hot Springs, AR 71901

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

Dear Mr. Ledbetter:

On May 15, 2019, I performed a Compliance Evaluation Inspection and an 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. A copy of each inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of each 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 **July 11, 2019**.

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

Travis Harmon
District 5 Field Inspector
Office of Water Quality

ADEQ
ARKANSAS
Department of Environmental Quality

WATER DIVISION INSPECTION REPORT

AFIN: **26-00145** | PERMIT #: **AR0033880** | DATE: **5/15/2019**

COUNTY: **26 Garland** | PDS #: **108323** | MEDIA: **WN**

GPS LAT: **34.450316** LONG: **-93.019033** LOCATION: **General Area**

FACILITY INFORMATION

NAME:
City of Hot Springs POTW
LOCATION:
320 Davidson Drive
CITY:
Hot Springs, AR 71901

RESPONSIBLE OFFICIAL

NAME: / TITLE
Monty Ledbetter / Utilities Director
COMPANY:
City of Hot Springs POTW
MAILING ADDRESS:
780 Adams Street
CITY, STATE, ZIP:
Hot Springs AR 71901
PHONE & EXT: / FAX:
501-651-7730 /
EMAIL:
mledbetter@cityhs.net
hmauldin@cityhs.net
gyates@cityhs.net

CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**
INSPECTOR ID#: **34689 S - State**
FACILITY EVALUATION RATING: **3 - Satisfactory**
INSPECTION TYPE: **Compliance Evaluation**
DATE(S): **5/15/2019**
ENTRY TIME: **10:10**
EXIT TIME: **13:30**
PERMIT EFFECTIVE DATE: **9/1/2018**
PERMIT EXPIRATION DATE: **8/31/2023**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Mr. Harold Mauldin/ Facility Manager
Mr. Gordon Yates/ Plant Supervisor
501-262-1125

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

S	PERMIT	**M**	FLOW MEASUREMENT	**N**	STORMWATER
S	RECORDS/REPORTS	**M**	LABORATORY	**N**	FACILITY SITE REVIEW
M	OPERATION & MAINTENANCE	**S**	EFFLUENT/RECEIVING WATER	**N**	SELF-MONITORING PROGRAM
S	SAMPLING	**S**	SLUDGE HANDLING/DISPOSAL	**N**	PRETREATMENT
N	OTHER:				

SUMMARY OF FINDINGS

The following violations were noted during the inspection:

1. **The facility reported permit limit exceedances in April, May, and June 2018. This is a violation of Part I.A of the permit. These exceedances were properly reported in monthly DMR and no inspection response is required for this item.**

2. **At the time of inspection, there were a few items requiring maintenance. This is a violation of Part III.B.1.A of the permit. Specifically, the following items need to be addressed:**
   - **A diffuser line in the middle aeration basin needs repair (see Photo 9).**
   - **Excessive algae are present in secondary clarifiers (see Photo 10).**
   - **The staff gauge at the Parshall flume is not readable and should be cleaned or replaced (see Photo 18).**

3. **The March 4, 2019 CBOD5 lab analysis sheet does not document the volume of seed added per bottle. Also, GGA analysis did not meet 198 mg/l +/- 30.5. This is a violation of Part III.C.3 of the permit. Please see attached lab sheet.**

GENERAL COMMENTS

Introduction

I inspected on May 15, 2019. The inspection was scheduled in advance. Mr. Harold Mauldin, Facility Manager, and Mr. Gordon Yates, Plant Supervisor, represented the facility during the inspection. Since the previous inspection, the treatment plant headworks was been upgraded and the second UV disinfection line has been installed. The treatment plant consists of screening, grit removal, primary clarification, activated sludge, secondary clarification, sand filtration, and UV disinfection.

Treatment Plant Inspection

I inspected the treatment plant from influent to final effluent. Mr. Yates accompanied me and answered all questions concerning treatment and operating conditions. During the plant inspection, I found a diffuser line needing repair and excessive algae in the secondary clarifiers. Plant personnel typically shut down a line for maintenance activities, but they have not been able to recently due to hydraulic overloads. For example, the plant has four secondary clarifiers and shuts one down for maintenance while the other three continue treatment. Also, the Parshall flume staff gauge needs replaced and was not readable at the time of inspection. The staff gauge is needed in order to conduct flowmeter checks. At the time of inspection, the treatment plant was operating at design capacity (12 MGD) and final effluent appeared sufficiently treated.

Records Review

I reviewed DMR from April 2018 to March 2019 prior to the inspection. The facility reported exceedances in April, May, and June 2018 DMR. No exceedances occurred from July 2018 to March 2019. DMR review did reveal multiple exceedances of plant design capacity as indicated by the reported Daily Maximum each month. The design capacity was exceeded nine of the previous twelve months with four months reporting a Daily Maximum flow over 30 MGD. The facility passed all parameters for biomonitoring in each quarterly sample from the previous twelve months. Mr. Mauldin provided the first quarter 2019 test report for verification of proper organisms, durations, and dilution series. I also reviewed lab analysis sheets for CBOD5. The facility reported adding 4 ml of seed per bottle, but they do not document this on the lab sheets. Also, recent GGA results are not meeting 198 mg/l +/- 30.5 mg/l. The March 4, 2019 analysis documents 154 mg/l.

INSPECTOR'S SIGNATURE: Travis Harmon	**Travis Harmon**	DATE: **6/7/2019**
SUPERVISOR'S SIGNATURE: Kerri McCabe	**Kerri McCabe**	DATE: **6/26/2019**

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y ☐N ☐NA ☐NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: **Plant discharges monthly max reported in DMR.**	☑Y ☐N ☐NA ☐NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y ☐N ☐NA ☐NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y ☐N ☐NA ☐NE

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y ☐N ☐NA ☐NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☑S ☐M ☐U ☐NA ☐NE
a. DATES AND TIME(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y ☐N ☐NA ☐NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y ☐N ☐NA ☐NE
e. RESULTS OF CALIBRATIONS:	☑Y ☐N ☐NA ☐NE
f. RESULTS OF ANALYSES:	☑Y ☐N ☐NA ☐NE
g. DATES AND TIMES OF ANALYSES:	☑Y ☐N ☐NA ☐NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y ☐N ☐NA ☐NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	☑S ☐M ☐U ☐NA ☐NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	☑S ☐M ☐U ☐NA ☐NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y ☐N ☐NA ☐NE

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☐S ☑M ☐U ☐NA ☐NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED: **Coupling in diffuser pipe needs repair in middle aeration basin; algae in secondary clarifiers and sand filters.**	☐S ☑M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑Y ☐N ☐NA ☐NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y ☐N ☐NA ☐NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y ☐N ☐NA ☐NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☑Y ☐N ☐NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: **Bypass reported 1/7/2019.**	☑Y ☐N ☐NA ☐NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☑Y ☐N ☐NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☑Y ☐N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: **April-June 2018 DMR.**	☑Y ☐N ☐NA ☐NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y ☐N ☐NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐N ☐NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y ☐N ☐NA ☐NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y ☐N ☐NA ☐NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐Y ☐N ☑NA ☐NE

SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☐S ☑M ☐U ☐NA ☐NE
DETAILS: **Flume staff gauge needs replaced.**	
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:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y ☐N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE: **Last calibrated 11/27/2018; due 11/7/2019.**	☑Y ☐N ☐NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES: **Calibrated by outside source.**	☐Y ☐N ☑NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☐S ☑M ☐U ☐NA ☐NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☑Y ☐N ☐NA ☐NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐Y ☐N ☑NA ☐NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y ☐N ☐NA ☐NE
4. QUALITY CONTROL PROCEDURES ADEQUATE: **For CBOD5, lab sheets do not include volume of seed added per bottle. Lab adds 4 ml per bottle but does not document. Lab is not meeting GGA limit of 198 mg/l +or- 30.5.**	☐Y ☑N ☐NA ☐NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
7. COMMERCIAL LABORATORY USED:	☐Y ☑N ☐NA ☐NE
a. LAB NAME: **American Interplex- Biomonitoring only**	
b. LAB ADDRESS: **8600 Kanis Road, Little Rock, AR 72204**	
c. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:	☑Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:	☑Y ☐N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION: **ADEQ review of contract lab identified improper duration in November 2018. Facility instructed to resubmit DMR to reflect NODI-M (Laboratory Error).**	☐Y ☑N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐Y ☐N ☑NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY — ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **Viewed at UV disinfection.**

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 — ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **Sludge is digested then belt pressed and taken to compost facility under IGP ARR000166.**

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☑S ☐M ☐U ☐NA ☐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 — ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☐N ☑NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☑NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☑NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☑NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☑NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☑NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☑NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☑NA ☐NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS — ☐S ☐M ☐U ☐NA ☑NE

DETAILS: **Inspection of ARR000059 (No-Exposure) conducted 5/15/2019. Please see additional inspection report.**

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☐NA ☑NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☐NA ☑NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☐NA ☑NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☐NA ☑NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☐NA ☑NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☐NA ☑NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☐NA ☑NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☐NA ☑NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☐NA ☑NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☐NA ☑NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☐NA ☑NE

DMR Calculation Check

Reporting Period:	**From**	**2019** (Year)	**03** (Month)	**01** (Day)	**To**	**2019** (Year)	**03** (Month)	**31** (Day)

Parameter Checked: **TSS**

	Loading	**Concentration**	
	Mass	**Monthly**	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	**628**	**4.8**	**9.9**
Calculated Value:	**628.1**	**4.8**	**9.94**
Permit Value:	**1500**	**15**	**22.5**

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period:	**From**	**2019** (Year)	**03** (Month)	**01** (Day)	**To**	**2019** (Year)	**03** (Month)	**31** (Day)

Parameter Checked: **TP**

	Loading	**Concentration**	
	Mass	**Monthly**	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	**36.6**	**0.29**	**0.51**
Calculated Value:	**36.6**	**0.288**	**0.512**
Permit Value:	**100.1**	**Report**	**Report**

If calculated value does not equal reported value, explain:

Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1022**
Witness:	**None**			Photo #:	**1**
Description:	**Plant influent box.**				

Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1020**
Witness:	**None**			Photo #:	**2**
Description:	**Two grit removal cells.**				

Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1020**
Witness:	**None**			Photo #:	**3**
Description:	**Plant headworks with two bar screens and grit removal.**				

Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1024**
Witness:	**None**			Photo #:	**4**
Description:	**View of bar screen.**				

Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1027**
Witness:	**None**			Photo #:	**5**
Description:	**Waste removal from bar screen.**				

Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1029**
Witness:	**None**			Photo #:	**6**
Description:	**One of three primary clarifiers.**				

Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1031**
Witness:	**None**			Photo #:	**7**
Description:	**Plant adds lime, alum, and sodium aluminate for pH adjustment.**				

Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1033**
Witness:	**None**			Photo #:	**8**
Description:	**Three aeration basins with activated sludge.**				

Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1035**
Witness:	**None**			Photo #:	**9**
Description:	**Diffuser line needs repair in middle aeration basin.**				

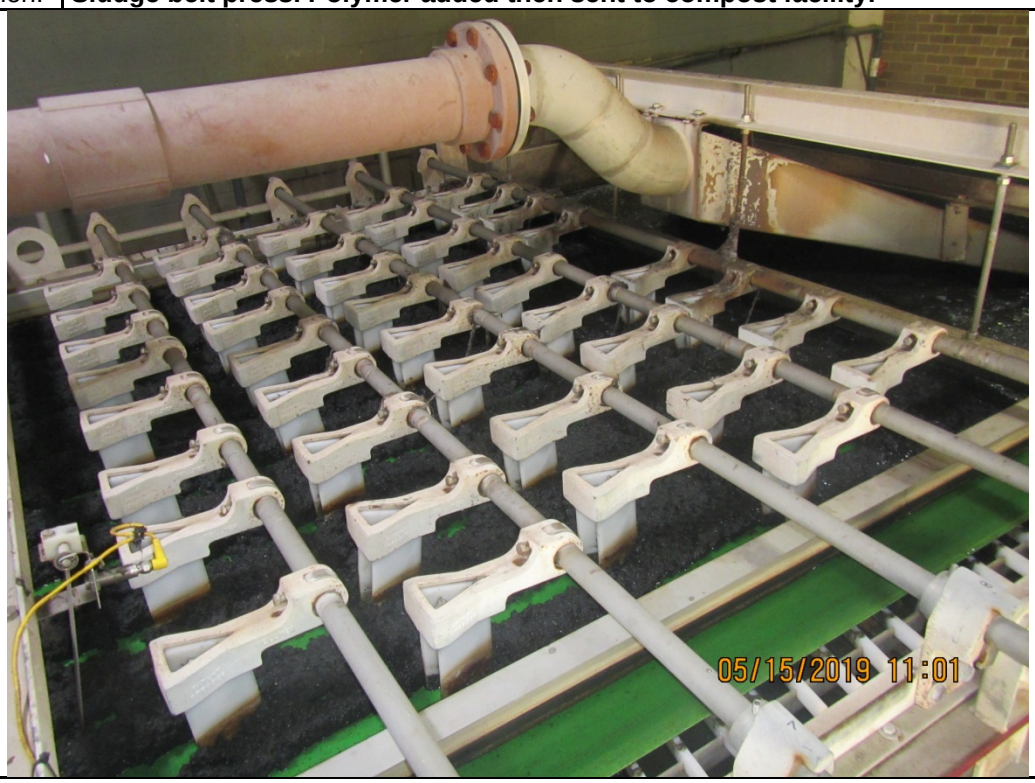
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1043**
Witness:	**None**			Photo #:	**10**
Description:	**One of four secondary clarifiers. Excessive algae in secondary clarifiers.**				

Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1041**
Witness:	**None**			Photo #:	**11**
Description:	**Blowers for aeration basins.**				

Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1049**
Witness:	**None**			Photo #:	**12**
Description:	**Digester.**				

Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1051**
Witness:	**None**			Photo #:	**13**
Description:	**Tertiary sand filters.**				

Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1101**
Witness:	**None**			Photo #:	**14**
Description:	**Sludge belt press. Polymer added then sent to compost facility.**				



Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1109**
Witness:	**None**			Photo #:	**15**
Description:	**Two lines of UV disinfection.**				

Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1113**
Witness:	**None**			Photo #:	**16**
Description:	**Effluent flowmeter. Reading 12.009 MGD at time of inspection.**				

Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1120**
Witness:	**None**			Photo #:	**17**
Description:	**Composite sampler with thermometer.**				

Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1116**
Witness:	**None**			Photo #:	**18**
Description:	**Staff gauge at Parshall flume needs replaced.**				

Water Division Photographic Evidence Sheet					
Location:	**City of Hot Springs POTW**				
Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1122**
Witness:	**None**			Photo #:	**19**
Description:	**Final effluent appears sufficiently treated at the time of inspection.**				

Photographer:	**Travis Harmon**	Date:	**5/15/2019**	Time:	**1256**
Witness:	**None**			Photo #:	**20**
Description:	**Equalization basin.**				

Figure 1. Google Earth Image of City of Hot Springs POTW.

#2TSS Effluent	.500	91.2	AC	92.6	AC	92.6	AC			2.4	2.6
										2.8	Average
MLSS	.002	91.7	3-3-19 0618 SR	96.4	3-3-19 0817 SR	96.4	3-3-19 0937 SR			2350	TSS
RAS	.001	92.6		100.0		99.9				7300	
RAW											

Carbonaceous Biochemical Oxygen Demand (C-BOD5) Method #5210B Approved by Standard Methods Committee 2001,Editorial Revisions 2011
Instrument: (Zeroing) Using BOD Probe and pH Meter with DO Setting for BOD Analysis (SOP Updated October 18th 2017)

Sample Pretreatment (1.2 liter)Barameter Reading 767.6 Temperature (Celsius) 21 = 7.51 mmhg

PH Adjustment to 7.04 with .1N H_2SO_4 Temperature 17.4 °C

Dilution Factor= Sample Volume /300 Depletion = Initial DO- Final D Seed Correction= Avg of Depletion of Seed Bottles/2 /0.083*0.013
C-BOD$_5$= Depletion-Seed Correction/Dilution Factor

Day BOD Water Preparation Date 02-27-19 Bottle # 3 By SR

Initial Time 0908 Date 03-04-19 By SR

Final Time 0835 Date 3-9-19 By AC

Sample	Bottle Number	Volume Sample (mg/l)	Dilution Factor	Initial DO	Final DO	Depletion	Seed Correction	Mg/L	Mg/L Average
Nutrient	12			8.85	8.72	0.13			
Seed	11	25	0.083	8.88	4.23	4.65	.73		
Seed	10	25	0.083	8.86	4.13	4.73	.73		
Quality Control (GGA)	9	3	0.01	8.85	5.04	3.81	.73	3.08	154
C-BOD$_5$ Effluent	5	180	.6	9.38	7.27	2.11	.73	2.30	2.43
C-BOD$_5$ Effluent	6	240	.8	9.57	7.21	2.36	.73	2.04	
C-BOD$_5$ Effluent	7	296	.99	9.80	6.70	3.10	.73	2.39	
C-BOD$_5$ Effluent	8	296	.99	9.80	6.50	3.30	.73	2.59	
BOD$_5$ Raw									
BOD$_5$ Raw									

4 ml seed TH per bottle

Date & Time: 03-04-19 0741 Analyst SR

Ammonia Nitrogen Method #4500 Nh3 D (SOP Updated October 18th 2017)
Approved by Standard Methods Committee 1997, Editorial Revisions 2011

Ammonia Nitrogen EPA Method 350.1

Initial (mv) 6.703

Final (mv) 9.0

Slope Check (mv) 58.3

Millivolt (MV)
(Millivolt Check Range Between Initial and Final)
58-7

Ammonia Blank 0.01

Weekly Nh3 Spike 1.02

Influent Ammonia

Ammonia Plant Effluent 0.02

Ammonia Plant Effluent 0.03

Standard Concentration 0.51
Standard Concentration Range (Mark Standards Used)

McConnell, Melissa

From: McCabe, Kerri
Sent: Wednesday, July 10, 2019 6:44 AM
To: McConnell, Melissa
Cc: Harmon, Travis
Subject: FW: City of Hot Springs POTW Inspections (Garland Co)
Attachments: doc00670120190709170013.pdf; doc00670220190709170047.pdf

Melissa,

Please add these responses to PDS 108323 and 108324 (doc ending in 47) and 108325 (doc ending in 13). 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
ARKANSAS
Department of Environmental Quality

From: Monty Ledbetter [mailto:MLedbetter@cityhs.net]
Sent: Tuesday, July 09, 2019 4:42 PM
To: McCabe, Kerri; Harold Mauldin; Gordon Yates
Cc: Harmon, Travis; Howard Hoover
Subject: RE: City of Hot Springs POTW Inspections (Garland Co)

Attached are both letters addressing the inspection that was performed by Travis Harmon at the RWWTP on May 15th.
I will hand deliver tomorrow morning before our meeting.
Thanks

Monty Ledbetter
Utilities Director
City of Hot Springs
(501) 651-7730

HOT SPRINGS
NATIONAL PARK ARKANSAS

From: McCabe, Kerri <MCCABE@adeq.state.ar.us>
Sent: Wednesday, June 26, 2019 1:49 PM
To: Monty Ledbetter <MLedbetter@cityhs.net>; Harold Mauldin <HMauldin@cityhs.net>; Gordon Yates <GYates@cityhs.net>
Cc: Harmon, Travis <HARMONT@adeq.state.ar.us>
Subject: City of Hot Springs POTW Inspections (Garland Co)

Please find attached the inspection reports submitted by Inspector Harmon. 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

CITY OF HOT SPRINGS

Utilities Department

780 Adams Street
Hot Springs, Arkansas 71901
Phone: (501) 651-7731 Fax: (501) 624-6528

July 8, 2019

Mr. Travis Harmon
District 5 Field Inspector
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: City of Hot Springs POTW Inspection (Garland County)
Stormwater Inspection
AFIN: 26-00145 NPDES Permit No.: ARR000059

Mr. Harmon,

On Wednesday, May 15, 2019, an Industrial Stormwater inspection was performed at the Regional Wastewater Treatment Plant (Permit #ARR00059). The inspection noted that the sludge loading conveyor extended beyond the containment berm. On July 2, 2019, the containment berm was extended to include the sludge loading conveyor and the zone where the truck receives the dewatered sludge, shown in photos below.

- At the time of inspection

- New Berm Extension

If you have any further questions or concerns, please contact me by phone at (501)651-7730 or by email at mledbetter@cityhs.net .

Sincerely,

Monty Ledbetter
Utilities Director

cc: Harold Mauldin, Hot Springs Wastewater Facilities Operations Manager
Bill Burrough, Hot Springs City Manager

CITY OF HOT SPRINGS

Utilities Department

780 Adams Street
Hot Springs, Arkansas 71901
Phone: (501) 651-7731 Fax: (501) 624-6528

July 8, 2019

Mr. Travis Harmon
District 5 Field Inspector
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: City of Hot Springs POTW Inspection (Garland County)
Compliance Evaluation Inspection
AFIN: 26-00145 NPDES Permit No.: AR0033880

Dear Mr. Harmon,

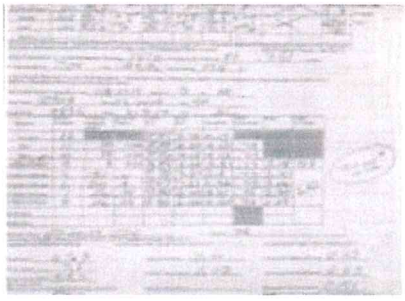
On Wednesday, May 15, 2019, a scheduled inspection was performed at the Regional Wastewater Treatment Plant. During the inspections, the following compliance issues were noted:

- Aeration Diffuser line needed repair

- Excessive Algae in Secondary Clarifier

- The Staff Gauge at Parshall Flume is not readable

- Lab Benchsheet does not document seed and QC (GCA) analysis didn't meet 198+/- 30.5mg/l

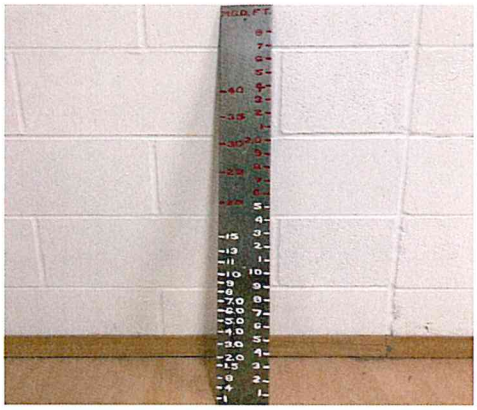


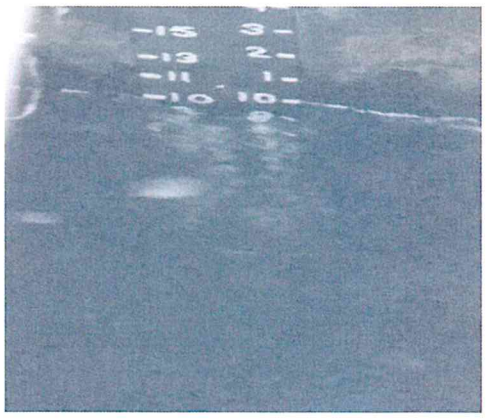
Over the past two weeks we addressed the necessary repairs and adjustments to each item of concern as follows.

- Aeration Diffuser Repaired

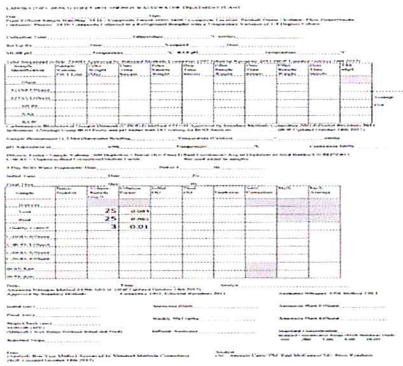
- Algae in Secondary. As noted in the report, hydraulic overloads have prevented proper maintenance in the Secondary. The repairs are scheduled to continue into the week of July 8.

- Staff Gauge Cleaned/ in Effluent Flow





- Lab Benchsheet with Proper Documentation



- Laboratory personnel are working to improve the QC(GGA) numbers. Since the inspection the QC has been in range consistently.

On Thursday, May 23, 2019, a scheduled inspection was performed on Hot Springs pump stations (Permit #AR0033880). During the inspections, the following violations were noted:

- One pump at the Rockefeller Pump Station would not start
- The visual alarm at the Mid-America Pump Station was not operable.

Prior to receipt of the official notice of violations in the inspection report, we made the necessary repairs and adjustments to each item of concern:

- Rockefeller Pump Station pump circuit breaker was reset
- Mid-America Pump Station visual alarm bulb replaced.

If you have any further questions or concerns, please contact me by phone at (501)651-7730 or by email at mledbetter@cityhs.net .

Sincerely,

Monty Ledbetter
Utilities Director

cc: Harold Mauldin, Wastewater Facilities Operations Manager (Regional WWTP)
Bobby Harris, Facilities Operations Manager (Lift Stations)

ADEQ

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

August 29, 2019

Monty Ledbetter, Utilities Director
City of Hot Springs POTW
780 Adams Street
Hot Springs, AR 71901

RE: City of Hot Springs POTW – Response to Inspections (Garland Co)
AFIN: 26-00145 NPDES Permit No.: AR0033880
ARR000059

Dear Mr. Ledbetter:

I have reviewed the response pertaining to my May 15, 2019 inspections of the City of Hot Springs POTW, Collection System, and Industrial Stormwater permits. 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,

Travis Harmon

Travis Harmon
District 5 Field Inspector
Office of Water Quality