ARKANSAS
ENERGY & ENVIRONMENT

May 26, 2022

Kevin A. Smith, Mayor
City of Helena-West Helena
P.O. Box 248
Helena-West Helena, AR 72342
Via email to: mayor@helena-westhelena.us ; odonaby@hwhwater.com

RE: Helena WWTP Inspections (Phillips Co)
AFIN: 54-00083 NPDES Permit No.: AR0043389
ARR00C436

Dear Mayor Smith:

On March 22, 2022 I performed a Compliance Evaluation Inspection and an Industrial Stormwater (No-Exposure) 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 of the inspection reports is enclosed for your records.

Please refer to the "Summary of Findings" section of the attached inspection report and provide a written response for each violation that was noted. This case has been referred directly to the Office of Water Quality - Enforcement Branch for further review. City of Helen-West Helena should immediately initiate all actions necessary to resolve and correct the violations cited in the inspection report. Written notification of the corrective actions taken for the violations must be submitted within thirty (30) calendar days from receipt of this letter to the attention of Richard Healey, Office of Water Quality - Enforcement Branch Manager, at (501) 682-0640 or healeyr@adeq.state.ar.us. This written notification should include; but not limited to, photographs and/or copies of other documentation.

If I can be of any assistance, please contact Inspector Supervisor Kerri McCabe at mccabe@adeq.state.ar.us or (501) 352-5641.

Sincerely,

Aaron Baggett
Inspector, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **54-00083**	PERMIT #: **AR0043389**	DATE: **3/22/2022**
COUNTY: **54 Phillips**	PDS #: **120394**	MEDIA: **WN**
GPS LAT: **34.49927** LONG: **-90.636241** LOCATION: **General Area**		

FACILITY INFORMATION

NAME:
Helena WWTP
LOCATION:
Approx. 1.5 miles West of Hwy 20 on Hwy 44
CITY:
Helena, AR 72342

RESPONSIBLE OFFICIAL

NAME: / TITLE
Kevin A. Smith / Mayor
COMPANY:
City of Helena-West Helena
MAILING ADDRESS:
P.O. Box 248
CITY, STATE, ZIP:
Helena-West Helena AR 72342
PHONE & EXT: / FAX:
(870)753 8528 /
EMAIL:
mayor@helena-westhelena.us; odonaby@hwhwater.com

CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**	INSPECTOR ID#: **142556 S - State**
FACILITY EVALUATION RATING: **1 - Unsatisfactory**	INSPECTION TYPE: **Compliance Evaluation**

DATE(S): **3/22/2022** ENTRY TIME: **12:40** EXIT TIME: **13:25**

PERMIT EFFECTIVE DATE: **2/19/2021**
PERMIT EXPIRATION DATE: **2/28/2026**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Oscar Donaby/odonaby@hwhwater.com

AREA EVALUATIONS

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

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

SUMMARY OF FINDINGS

The following violations were noted during the inspection and require a response:

1) **The following items violate Part III, Section B, 1, A of the permit:**
   - **The access road to the treatment facility is in need of repair.**
   - **Sections of the lagoon levees were not safely accessible by vehicle at the time of inspection.**
   - **There was inadequate freeboard in the lagoons at the time of the inspection.**

2) **The following items violate Part 1, Section A of the permit:**
   - **Only seven samples were taken in January 2021.**
   - **No samples were taken for the first three weeks of October 2021.**

GENERAL COMMENTS

On Tuesday, March 22, 2022, an inspection was conducted with the above-mentioned inspection participants. The inspection consisted of a site assessment and a records review.

Site Assessment

The treatment system for Outfall 001 consists of a four-cell lagoon system.

The following issues were noted for the treatment system for Outfall 001:

- **The access road to the lagoons was rutted and in need of repair at the time of inspection. The lagoons must be accessible by vehicle for inspection and maintenance at all times.**
- **Some sections of the levees were not accessible by vehicle. During the inspection, the operators indicated they were unsure if the access road and levees would be accessible or safely travelled by vehicle and were unable to comment on their stability.**
- **There is inadequate freeboard in the lagoons, particularly in Cell 3 and Cell 4. Levels in the lagoons have risen high enough for wave action to occur above the rip-rap stabilization along the levees (Photos 2; 8)**

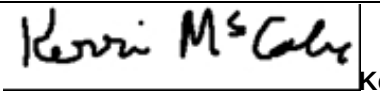
It should be noted that the previously-damaged levee separating Cells 2 and 4 has been repaired and is now functional (Photo 3).

Records Review

Records for January, May, July, and October of 2021 were requested and provided. Records were made available via email and are deemed organized and complete unless otherwise noted.

Only seven samples were taken in January of 2021, and no samples were taken during the first three weeks of October 2021. Part 1, Section A of the permit requires a minimum three/week sampling frequency. Additionally, no flow was reported for the first three weeks of October 2021.

Complete composite sample data were not provided on COC. There is no information regarding aliquot sampling intervals on the COC, and it cannot be demonstrated whether samples were collected proportional to flow or per the definition of "composite" in Part IV of the permit. The timeframes selected by the contract lab may not be representative of the nature and volume of the discharge.

INSPECTOR'S SIGNATURE: 	**Aaron Baggett**	DATE: **4/22/2022**
SUPERVISOR'S SIGNATURE: 	**Kerri McCabe**	DATE: **5/26/2022**

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y ☐N ☐NA ☐NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	☐Y ☐N ☑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: **Missing aliquot information for composite samples.**	☐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: **High levels in all lagoons.**	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☐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:	☑Y ☐N ☐NA ☐NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☑Y ☐N ☐NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☐Y ☑N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☐Y ☐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: **Information not available in sample data.**	☐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: **Not evaluated during inspection due to thunderstorm; primary measurement device is 4' rectangular weir; secondary measurement device is Milltronics HydroRanger.**	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE:	☐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:	☐Y ☐N ☐NA ☑NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☐Y ☐N ☐NA ☑NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☐Y ☐N ☐NA ☑NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☐Y ☐N ☐NA ☑NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☐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: **City uses a contract lab for all samples.**	
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:	☑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:	
b. LAB ADDRESS:	
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:	☑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: **Observed at final lagoon prior to discharge to lift station for Mississippi River.**

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	NO	NO	NO	NO	NO	LIGHT	--

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS — ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **Sludge retained in lagoon.**

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): **N/A**

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: **Inspected under IGP ARR00C436.**

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 **2021** (Year) **7** (Month) **01** (Day) To **2021** (Year) **7** (Month) **31** (Day)

Parameter Checked: **TSS**

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	**778.6**	**54.5**	**64.0**
Calculated Value:	**779.6**	**54.5**	**64.0**
Permit Value:	**1276.0**	**90.0**	**135**

If calculated value does not equal reported value, explain:
Minor difference in values is due to rounding.

DATE	CONCENTRATION (mg/l)	MGD	MASS(lbs/day)	7-DAY AVERAGE(mg/l)
2	36	1.797	539.53128	42
6	50	1.857	774.369	
9	40	1.693	564.7848	
12	54	1.89	851.1804	55.33
13	46	1.6	613.824	
16	66	2.105	1158.6762	
19	56	1.647	769.21488	56.66
20	50	1.696	707.232	
23	64	1.804	962.90304	
26	70	1.758	1026.3204	64
27	70	1.545	901.971	
30	52	1.118	484.85424	
MONTHLY AVG	**54.5**	**1.7092**	**779.57177**	

DMR Calculation Check

Reporting Period: From **2021** (Year) **01** (Month) **01** (Day) To **2021** (Year) **01** (Month) **31** (Day)

Parameter Checked: **BOD5**

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	**230.5**	**16.9**	**22.7**
Calculated Value:	**228.78**	**16.94**	**22.65**
Permit Value:	**425.3**	**30.0**	**45.0**

If calculated value does not equal reported value, explain: **Minor difference in values is due to rounding.**

DATE	CONCENTRATION (mg/l)	MGD	MASS(lbs/day)	7-DAY AVERAGE(mg/l)
4	13.23	2.061	227.4070302	13.23
15	22.65	1.512	285.618312	22.65
18	17.34	1.473	213.0187788	18.13
19	19.11	1.563	249.1068762	
22	17.94	1.468	219.6415728	
25	13.68	1.606	183.2304672	14.145
26	14.61	1.834	223.4681316	
MONTHLY AVG	**16.94**	**1.6453**	**228.7844527**	

Office of Water Quality Photographic Evidence Sheet					
Location:	**Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1318**
Witness:	**Kerri McCabe**			Photo #:	**1**
Description:	**Sign at entrance of facility advertising EAPDD funding for levee repairs.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1250**
Witness:	**Kerri McCabe**			Photo #:	**2**
Description:	**Weir box in Cell 4 leading to pump house for Outfall 001.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1251**
Witness:	**Kerri McCabe**			Photo #:	**3**
Description:	**Levee between Cells 2 and 4 that was repaired in 2019; facing approximately northwest.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1251**
Witness:	**Kerri McCabe**			Photo #:	**4**
Description:	**Cell 2 overview; large ruts in levee in foreground; facing approximately north.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1251**
Witness:	**Kerri McCabe**			Photo #:	**5**
Description:	**Levee along eastern boundary of Cell 2; rut in levee in bottom left of photo; facing northeast.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1255**
Witness:	**Kerri McCabe**			Photo #:	**6**
Description:	**Levee between Cells 3 and 4; facing northeast.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1255**
Witness:	**Kerri McCabe**			Photo #:	**7**
Description:	**Levee between Cells 3 and 4; facing east.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1256**
Witness:	**Kerri McCabe**			Photo #:	**8**
Description:	**Western levee of Cell 3; facing northwest. Level in this cell is above the rip-rap along the levee.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1304**
Witness:	**Kerri McCabe**			Photo #:	**9**
Description:	**Levee between Cells 1 and 2; facing west.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1304**
Witness:	**Kerri McCabe**			Photo #:	**10**
Description:	**Levee between Cells 1 and 2; influent structure shown near in center of photo.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**Helena WWTP**				
Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1305**
Witness:	**Kerri McCabe**			Photo #:	**11**
Description:	**Southern-side of levee between Cells 1 and 2; facing northwest.**				

Photographer:	**Aaron Baggett**	Date:	**3/22/2022**	Time:	**1305**
Witness:	**Kerri McCabe**			Photo #:	**12**
Description:	**Overview of Cell 2; facing approximately west.**				

Figure 1. Google Earth image depicting overview of the Helena WWTP and Outfall 001; satellite base imagery dated 11/11/2020.

Figure 2. Google Earth image depicting components and simplified flow path of the Helena WWTP; satellite base imagery dated 11/11/2020.