

DIVISION OF ENVIRONMENTAL QUALITY

January 11, 2024

Steve Metcalf, VP Arkansas Electric Cooperative 1 Cooperative Way Little Rock, AR 72209 Email Address: <u>steve.metcalf@aecc.com</u>

RE: Magnet Cove Generating Station Inspection- PDS# 128512 AFIN: 30-00337 Permit No.: AR0049611

Dear Mr. Metcalf:

On November 30, 2023, I performed a Compliance Evaluation 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 the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of the inspection report and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to <u>Water-Inspection-Report@adeq.state.ar.us</u>. This response should contain documentation describing the course of action taken to correct each item noted. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e. photos) is due by January 26, 2024.

If I can be of any assistance, please contact me at <u>blain.sanders@adeq.state.ar.us</u> or (501) 682-0657.

Sincerely,

blair JAN 934

Blain Sanders Inspector, Office of Water Quality

Jan Starter Strategy	ENVIRONMENTAL QUALITY	OFFICE OF WATER QUALITY INSPECTION REPORT           AFIN: 30-00337         PERMIT #: AR0049611         DATE: 11/30/2023           COUNTY: 30 Hot Spring         PDS #: 128512         MEDIA: WN           GPS LAT: 34.429962         LONG: -92.834546         LOCATION: Entrance							
	FACILITY INFORMAT								
MARE: Magnet Cove Generating Station			FACILITY TYPE: 2 - Industrial	INSPECT 1232	PECTION INFORMATION NSPECTOR ID#: 123247 S - State				
	0 Henderson Road			FACILITY EVALUATION RATING	:	INSPECTION TYPE: Compliance Evaluation			
CITY: Ma	lvern			==(=).	TRY TIME:	EXIT TI 10:1		PERMIT EFFECTIVE DATE:	
RESPONSIBLE OFFICIAL						10.	10	11/1/2018 PERMIT EXPIRATION DATE:	
								10/31/2023	
	PANY:			FAYETTEVILLE SHALE RELATED: N					
	kansas Electric Cooperative			FAYETTEVILLE	SHAL	E VIOL	ATION	NS: <b>N</b>	
	Cooperative Way					TION P	ARTIC	CIPANTS	
CITY, STATE, ZIP: Little Rock AR 72209 PHONE & EXT: / FAX: / EMAIL: steve.metcalf@aecc.com			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Blain Sanders, DEQ Inspector, 501-682-0657 Mark Folsland, Manager, Ark Electric Co-op Casey Shepard, Ark Electric Co-op						
	INTACTED DURING INSPECTION								
		LUAIIUN3 tisfactory, N=Not Applicable/I	Evaluated						
S	PERMIT	S	FLOW MEASUR	REMENT	Ν	STOR			
Μ	RECORDS/REPORTS	S	LABORATORY		N FACILITY SITE REVIEW				
S	OPERATION & MAINTENANCE	S		CEIVING WATER	Μ			ITORING PROGRAM	
S	SAMPLING	Ν	SLUDGE HAND	DLING/DISPOSAL <b>N</b> PRETREATMENT			MENT		
Μ	OTHER:								

## SUMMARY OF FINDINGS

The following item was noted and requires a written response:

A discrepancy was noted in the Total Suspended Solids (TSS) Mass Loading reported for the month of September 2023. Please explain the calculations used to determine and report the loading rate as required by Part I. A. of the permit.

## **GENERAL COMMENTS**

Please note that a sample obtained by Arkansas Analytical Inc. was received at a temperature of 8°C which exceeds the required holding temperature of 6°C or less. Please ensure samples are being cooled appropriately once collected.

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INSPECTOR'S SIGNATURE: Blain Sanders	DATE: 1/4/2024
SUPERVISOR'S SIGNATURE: Brest L. Walker Brent L. Walker	DATE: <b>1/9/2024</b>

SECTION A: PERMIT VERIFICATION PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: Minor discrepancies in loading rates	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	L
1. TREATMENT UNITS PROPERLY OPERATED:	
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆 m 🗇 u 🗆 na 🗇 n
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆 m 🗇 u 🗆 na 🗇 n
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗆 m 🗇 u 🗆 na 🗇 n
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: Casey Shepard; Class B Industrial & others	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:         14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	

SECTION D: SAMPLING			
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE		
DETAILS:			
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:			
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	Øy On Ona One		
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	Dy On Øna One		
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	Øy On Ona One		
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	Øy On Ona One		
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:			
a. SAMPLES REFRIGERATED DURING COMPOSITING:			
b. PROPER PRESERVATION TECHNIQUES USED:			
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:			
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:			
SECTION E: FLOW MEASUREMENT			
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE		
DETAILS:			
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 60° V-notch weir			
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:			
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:			
4. CALIBRATION FREQUENCY ADEQUATE:			
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:			
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:			
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:			
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:			
9. HEAD MEASURED AT PROPER LOCATION:			
SECTION F: LABORATORY			
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	ØS OM OU ONA ONE		
DETAILS:			
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :			
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:			
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:			
4. QUALITY CONTROL PROCEDURES ADEQUATE:			
5. DUPLICATE SAMPLES ARE ANALYZED >10% OF THE TIME:			
6. SPIKED SAMPLES ARE ANALYZED <u>&gt;</u> 10% OF THE TIME:			
7. COMMERCIAL LABORATORY USED:	Øy 🛛 n 🖾 na 🖾 ne		
a. LAB NAME: Arkansas Analytical Inc.			
b. LAB ADDRESS: 8100 National Drive Little Rock, AR 72209			
c. PARAMETERS PERFORMED: TSS, O&G, pH, Total Recoverable Chromium, Total Recoverable Zinc			
8. BIOMONITORING PROCEDURES ADEQUATE:			
a. PROPER ORGANISMS USED: Pimephales promelas & Daphnia pulex			
b. PROPER DILUTION SERIES FOLLOWED: 0%, 5%, 7%, 10%, 13%, 17%			
c. PROPER TEST METHODS AND DURATION:			
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:			

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS												
BASED ON VISUAL OBSERVATIONS ONLY												
DETAILS:												
OUTFALL #:	OIL SHEEN         GREASE         TURBIDITY         VISIBLE FOAM         FLOATING SOLIDS         COLOR											
001	None	None	None	None	None	Clear						
01A	None	None	None	None	None	Clear						
01B	None	None	None	None	None	Clear						
SECTION H: SLUDGE DISPOSAL												
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS												
DETAILS:												
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊡s ⊡m						
2. SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 40	) CFR 503:			⊡s ⊡m	DU 🗹 NA DNE					
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):							
	SAMPLING IN				T							
	RESULTS WITH	IN PERMIT R	EQUIREMENT	S			U ⊠NA ⊡NE					
DETAILS:												
						ΠY	⊡n Øna ⊡ne					
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:								
3. SAMPLES PRESERVED:												
4. FLOW PROPORTIONED SAMPLES OBTAINED:												
5. SAMPLE O	BTAINED FROM FACIL	ITY'S SAMPLING DEV	ICE:									
	EPRESENTATIVE OF		E OF DISCHARGE:									
7. SAMPLE SE	PLIT WITH PERMITTER	:										
	CUSTODY PROCEDU											
9. SAMPLES (	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY						
	STORM WATE		-									
_	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			U INA ØNE					
DETAILS:												
	DATED AS NEEDED:											
	NCLUDING ALL DISCH		CE WATERS:									
	N PREVENTION TEAM											
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:												
	5. LIST OF POTENTIAL POLLUTANT SOURCES:											
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:												
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:												
8. LIST OF STRUCTURAL BMPS:												
	DN-STRUCTURAL BMF											
	PERLY OPERATED A											
11. INSPECTIONS CONDUCTED AS REQUIRED:												

## **DMR Calculation Check**

<b>Reporting Period:</b>	From	2023	9	1	_ То	2023	9	30	
		Year	Month	Day		Year	Month	Day	
Parameter Checked:	0	TSS utfall 001	-						
	Loading Mass Mo. Avg Ibs/day			Concentration Monthly					
				Mo. Avg mg/l			7-day Avg	mg/l	
Reported Value:		<8.6			<4.8		<4.8		
Calculated Value:		5.22		<4.8			<4.8		
Permit Value: 158.0				30.0 100.			0		

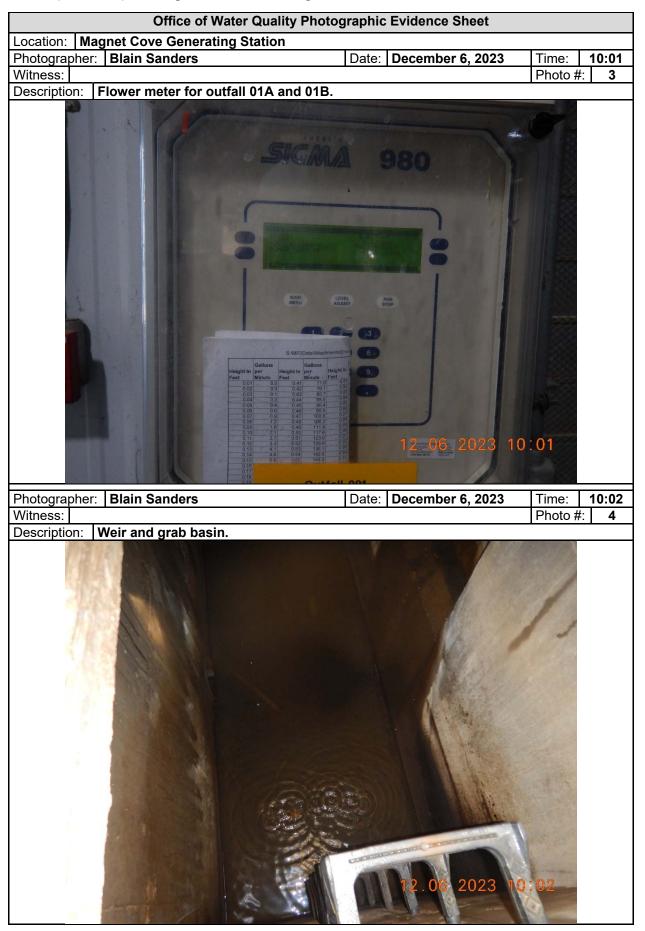
If calculated value does not equal reported value, explain: <u>Please explain your calculations for monthly average in pounds per day for Total Suspended</u> <u>Solids (TSS) for the month of September 2023.</u>

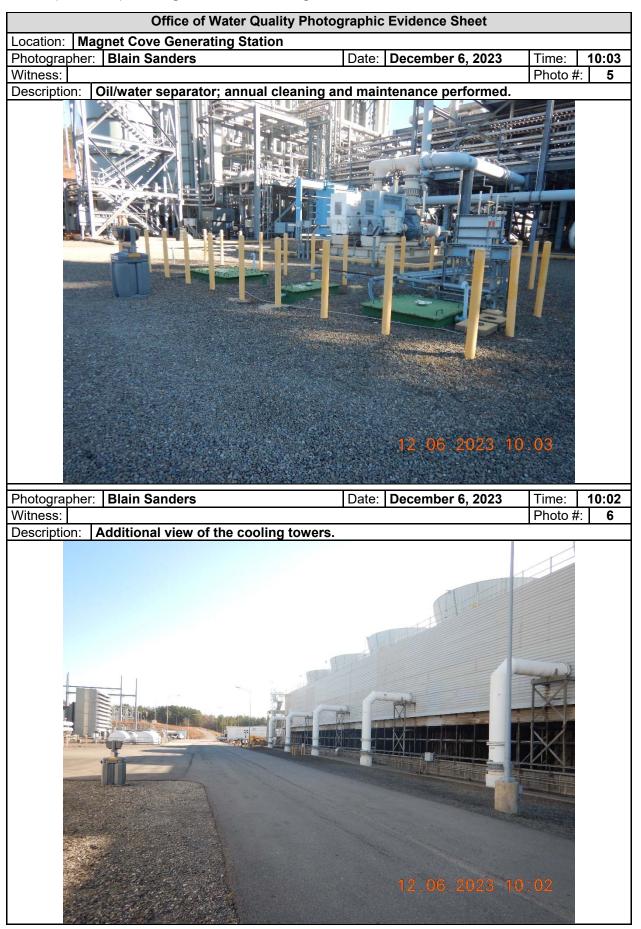
## **DMR Calculation Check**

Reporting Period:	From	2023 Year	9 Month	1 Day	_ To _	2023 Year	9 Month	30 Day
Parameter Checked:	Oil	& Grease 01B	-					
	Loading Mass			Concentration Monthly				
	Мо. /	Avg Ibs/d	ay	Mo. A	vg r	ng/l	7-day Avg	mg/l
Reported Value:		<1.1			<4.9		<4.9	
Calculated Value:	0.9			<4.9			<4.9	9
Permit Value:		10.0			15.0		20.0	)

If calculated value does not equal reported value, explain:







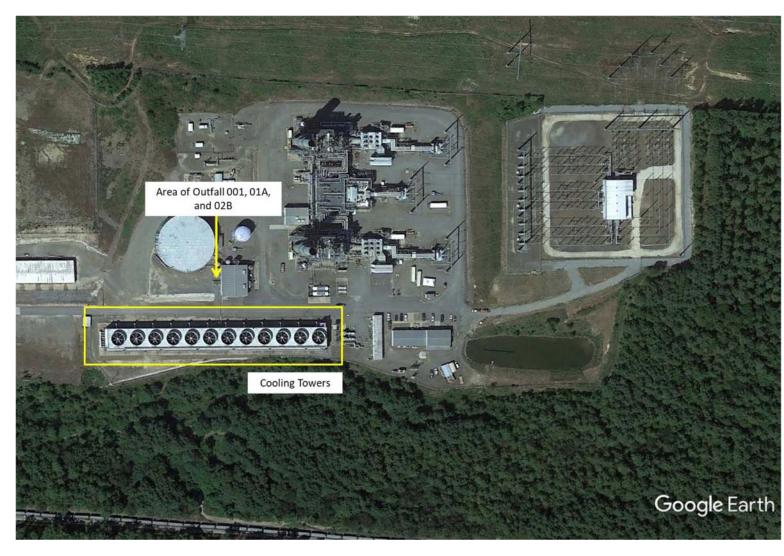


Figure 1: Google Earth image of the AECC Magnet Cove Generating Station.