

DIVISION OF ENVIRONMENTAL QUALITY

June 26, 2024

Mr. Richard Cooper, Asst. Director Arkansas Department of Corrections- North Central Unit PO Box 8707 Pine Bluff, AR 71603 Email Address: <u>richard.cooper@arkansas.gov</u>

RE: Arkansas Dept. of Correction North Central Inspection (Izard County) – PDS# 130669 AFIN: 33-00036 Permit No.: AR0044016

Dear Mr. Cooper:

On June 6, 2024, I performed a Compliance Evaluation Inspection and Construction Modification 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 July 10, 2024.

If I can be of any assistance, please contact me at travis.harmon@adeq.state.ar.us or (501) 837-2070.

Sincerely,

Travis Horman

Inspector, Office of Water Quality

CC via email: <u>chris.ashcraft@arkansas.gov</u> <u>lisa.ellison@arkansas.gov</u> <u>ronald.riley@arkansas.gov</u>

Leres		OFFICE OF WATER QUALITY INSPECTION REPORT							
( ENER		AF	AFIN: 33-00036 PERMIT #: AR0044		1016		DATE: 6/6/2024		
6,	AND ENVIRON	CC	UNTY: 33 Izar	d	PDS :	#: <b>130669</b>	MEDIA: WN		
		GP	S LAT: 36.166	551 LONG: -92.152	2031 L	OCATION:	General Area		
	FACILITY INFORMAT	ION		IN	SPEC <sup>-</sup>	TION INFO	RMATION		
	kansas Dept. of Correction North	Cen	tral	FACILITY TYPE: 2 - Industrial	INSPECT 3468	ror ID#: 39 S - State			
	Prison Circle			FACILITY EVALUATION RATIN 3 - Satisfactory		Cor	npliance Evaluation		
Ca	lico Rock, AR 72519			(-)	ITRY TIME:	EXIT TIME: 12:00	PERMIT EFFECTIVE DATE:		
	RESPONSIBLE OFFIC	CIAL			6/6/2024 11:00 12:00 6/1/2021 PERMIT EXPIRATION DATE:				
			_			5/31/2026			
COM	. Richard Cooper / Asst. Director	Γ		FAYETTEVILLE	FAYETTEVILLE SHALE RELATED: N				
Arkansas Department of Corrections- North Central				FAYETTEVILLE	••••				
Unit									
	NG ADDRESS: Box 8707			NAME/TITLE/PHONE/FAX/EMA					
	STATE, ZIP:				Chris Ashcraft/ chris.ashcraft@arkansas.gov				
	ne Bluff AR 71603				Lisa Ellison/ lisa.ellison@arkansas.gov Ronald Riley/ ronald.riley@arkansas.gov				
-	ie & ext: / FAX: D-267-6620 /			Konald Kliey/ h	Konalu Kiley/Tonalu.mey@arkansas.gov				
EMAI									
ric	hard.cooper@arkansas.gov								
CC	INTACTED DURING INSPECTION:	\$							
				ALUATIONS	_				
S	ess PERMIT	S	FLOW MEASU	satisfactory, N=Not Applicable	/Evaluated		ATER		
S	RECORDS/REPORTS	N	LABORATOR		N	SITE REVIEW			
S	OPERATION & MAINTENANCE	S		ECEIVING WATER			NITORING PROGRAM		
S	SAMPLING	S		DLING/DISPOSAL	N	PRETREA			
Ν	OTHER:	LI							

#### SUMMARY OF FINDINGS

I found no new permit violations at the time of inspection. The facility has previously reported exceedances from November 2023 through April 2024 in monthly DMR.

#### GENERAL COMMENTS

#### **Introduction**

I inspected June 6, 2024. The inspection was scheduled and Mr. Chris Ashcraft and Mr. Ronald Riley, Operators, represented the facility. ADC operates a WWTP at the North Central Unit, designed to treat 0.09 MGD.

#### WWTP Inspection

I inspected the WWTP from influent to final effluent. Stages of treatment include a recently installed mechanical bar screen, a second barscreen, a third barscreen, an oxidation ditch, two secondary clarifiers in series, and UV disinfection. All systems of treatment appeared to be properly maintained at the time of inspection and RAS appeared the appropriate color. There was some foaming in the oxidation ditch, presumably biological in nature. The foam remained in a portion of the oxidation ditch. The effluent flow meter was calibrated by an outside source in April 20204. The facility also operates covered sludge drying beds for land application under 5124-WR-2.

#### **Records Review**

I reviewed monthly DMR from May 2023 through April 2024. During this time period, the facility reported exceedances of NO3+NO2-N in November through April, FCB in February and April, and CBOD in March. These exceedances were properly reported in monthly DMR. Ms. Lisa Ellison, Administrative Specialist, provided the April 2024 sample collection and custody sheet, associated lab analysis, and monthly flow records for review. Samples are analyzed by Arkansas Analytical, Inc.

Francis Horman	
INSPECTOR'S SIGNATURE: Travis Harmon	DATE: 6/17/2024
Army Huneyeitt	
SUPERVISOR'S SIGNATURE: O Amy Huneycutt	DATE: 6/17/2024

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ON
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:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	🗹 s 🗆 m 🗇 u 🖾 na 🗇 n
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:	
1. TREATMENT UNITS PROPERLY OPERATED:	
2. TREATMENT UNITS PROPERLY MAINTAINED:	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆 m 🗇 u 🗆 na 🗇 n
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	
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	
<ol> <li>PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:</li> <li>HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:</li> </ol>	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
<ol> <li>HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:</li> <li>IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:</li> </ol>	DY DN ØNA DN
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	

SECTION D: SAMPLING			
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS			
DETAILS:			
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:			
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:			
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:			
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:			
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:			
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	⊠S ⊡M ⊡U ⊡NA ⊡NE		
DETAILS:			
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 45 degree v-nc	<u>etch weir</u> DY DN DNA DNE		
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:			
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:			
4. CALIBRATION FREQUENCY ADEQUATE: Calibrated April 2024			
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES: Contractor sticker			
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	□S □M □U □NA ØNE		
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 ≥10% OF THE TIME:			
7. COMMERCIAL LABORATORY USED:			
a. LAB NAME: Arkansas Analytical, Inc.			
b. LAB ADDRESS: 8100 National Drive, Little Rock, AR 72209			
c. PARAMETERS PERFORMED: All			
8. BIOMONITORING PROCEDURES ADEQUATE:			
a. PROPER ORGANISMS USED:			
b. PROPER DILUTION SERIES FOLLOWED:			
c. PROPER TEST METHODS AND DURATION:			
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:			

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS									
BASED ON	VISUAL OBS	ERVATIONS C	DNLY			ØS OM O			
DETAILS:	Viewed at weir								
OUTFALL #:	OIL SHEEN	FLOATING SOLIDS	COLOR	OTHER					
001	none	none	none	none	none	clear			
	•				•				
SECTION H	I: SLUDGE DIS	POSAL							
SLUDGE D	DISPOSAL MEE	ETS PERMIT F	REQUIREMEN	ГS		ØS 🗆 M 🗆			
DETAILS:									
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡м			
2. SLUDGE R	ECORDS MAINTAINED	DAS 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): A	gricultural- 5124-WR-	2		
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES						
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			IU ⊠NA ⊡NE		
DETAILS:									
1. SAMPLES	OBTAINED THIS INSPE	ECTION:				ΠY	🗆 n 🗹 na 🗆 ne		
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:					
3. SAMPLES	. SAMPLES PRESERVED:								
4. FLOW PRC	. FLOW PROPORTIONED SAMPLES OBTAINED:								
5. SAMPLE O	5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:								
6. SAMPLE R	EPRESENTATIVE OF	OLUME AND NATUR	E OF DISCHARGE:			ΠY	On Øna One		
7. SAMPLE S	PLIT WITH PERMITTE	E:				ΠY	On Øna One		
8. CHAIN-OF-	8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:								
9. SAMPLES	9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:								
SECTION J	: STORM WAT	ER POLLUTION	PREVENTION	PLAN	1				
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			IU ⊠NA ⊡NE		
DETAILS:									
1. SWPPP UF	DATED AS NEEDED:	DATE OF LAST UP	DATE:			ΠY	⊡n Øna ⊡ne		
2. SITE MAP I	INCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			ΠY	□n Øna □ne		
3. POLLUTIO	POLLUTION PREVENTION TEAM IDENTIFIED:								
4. POLLUTIO	POLLUTION PREVENTION TEAM PROPERLY TRAINED:								
5. LIST OF PC	LIST OF POTENTIAL POLLUTANT SOURCES:								
6. LIST OF PC	6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:       Image: Comparison of the second s								
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:     Image: Comparison of the second se									
8. LIST OF ST	8. LIST OF STRUCTURAL BMPS: DY DN DNA DNE								
9. LIST OF NO	9. LIST OF NON-STRUCTURAL BMPS:								
10. BMPS PRC									
11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:				ΠY			

## **DMR Calculation Check**

Reporting Period:	From	2024	04	01	То	2024	04	30		
		Year	Month	Day		Year	Month	Day		
Parameter Checked:		TSS	-							
		Loading				Concor	tration			
		-			Concentration					
		Mass			Monthly					
	Mo.	Avg Ibs/d	ау	Mo. A	vg r	ng/l	Daily Max	mg/l		
Reported Value:	3.9			5.5			5.5			
Calculated Value:		3.898		5.5			5.5			
Permit Value: 11.3				15.022.5			5			

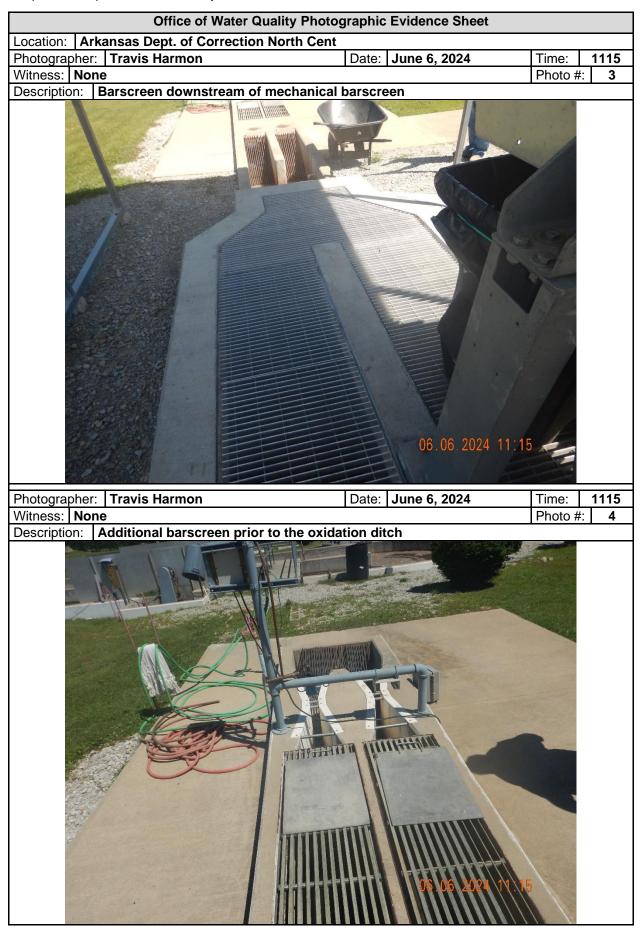
If calculated value does not equal reported value, explain:

## **DMR Calculation Check**

<b>Reporting Period:</b>	From	2024	04	01	То	2024	04	30		
		Year	Month	Day		Year	Month	Day		
Parameter Checked:		CBOD	-							
		Loading				Concer	ntration			
		Mass			Monthly					
	Mo.	Avg Ibs/d	ay	Mo. A	vg n	ng/l	Daily Max	mg/l		
Reported Value:		1.42			2.0		2.0	)		
Calculated Value:		1.417			2.0		2.0	)		
Permit Value:		7.5			10		15			

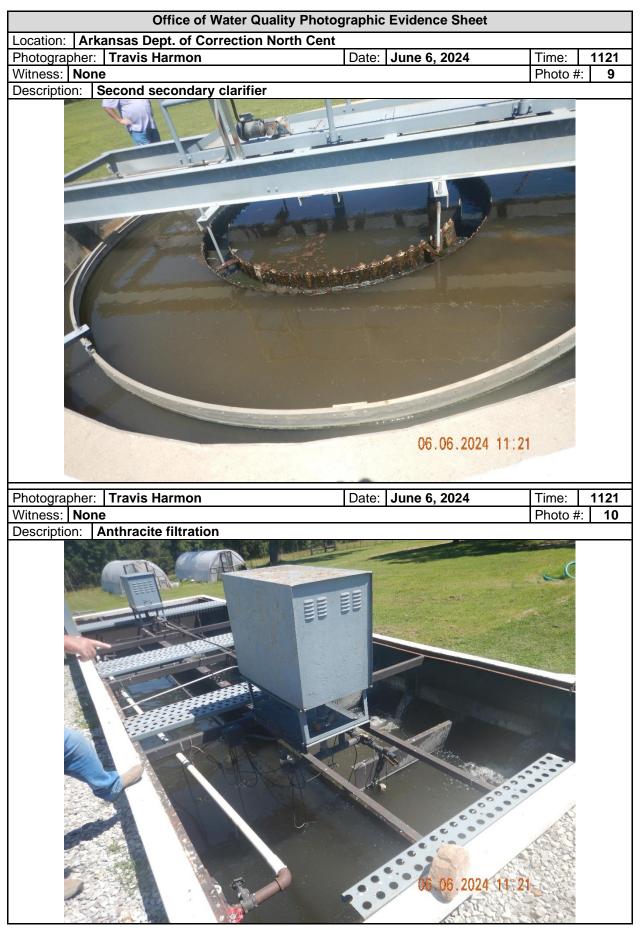
If calculated value does not equal reported value, explain:













Inspection Report Page 14 of 16



# Inspection Report: Arkansas Dept. of Correction North Cent, AFIN: 33-00036, Permit #: AR0044016

Google Earth:



From:	Ben Cobb <bcobb@mce.us.com></bcobb@mce.us.com>
Sent:	Thursday, June 27, 2024 2:14 PM
То:	Water-Inspection-Report@adeq.state.ar.us
Cc:	Jason Temple; Richard Cooper (DOC); Beecher Brodnax (DOC); Ronald Riley
	(DOC); Chris Ashcraft (DOC); Sandra Jefferson (DOC); James Flannery (DOC);
	Adam Triche; Tiana.Toups@adeq.state.ar.us
Subject:	Response to Inspection conducted 6/6/24 for NCU
Attachments:	Response to ADEQ 130669-insp.pdf; Response to ADEQ 130671-insp.pdf
Follow Up Flag: Flag Status:	Follow up Flagged

To whom it may concern,

Please see attached response letters to the inspections conducted for the AR0044016 permit and the AR0044016C permit.

Thanks,





Benjamin Cobb

Intern W (501) 371.0272 C: (903) 826.9727 7302 Kanis Road Little Rock, AR 72204



7302 Kanis Road Little Rock, AR 72204 (501) 371.0272 P | (501) 371.9932 F <u>mce.us.com</u>

June 27, 2024

Mr. Travis Harmon Inspector, Office of Water Quality 5301 Northshore Drive North Little Rock, Arkansas 72118

RE: Arkansas Department of Correction-North Central Unit (AR0044016) WWTP Inspection 130669

Dear Mr. Harmon,

In regards to the inspection conducted at the Arkansas Department of Correction (ADC) North Central Unit (NCU) wastewater treatment plant (WWTP) on June 6, 2024, McClelland Consulting Engineers (MCE) reviewed the report issued by the Division of Environmental Quality (DEQ), and based on the summary of findings there are no new violations to implement corrective actions towards.

Jason C. Temple, P.E.

DESIGNED TO SERVER ENGINEERS, INC.

Senior Project Manager MCE-Little Rock (501) 371.0272 dhernandez@mce.us.com



# DIVISION OF ENVIRONMENTAL QUALITY

August 22, 2024

Mr. Richard Cooper, Asst. Director Arkansas department of Corrections North Central Unit PO Box 8707 Pine Bluff, AR 71603 Email Address: Richard.Cooper@arkansas.gov

RE: Adequate Response to ADOC North Central Unit Inspection- PDS# 130669 & 130671 AFIN: 33-00036 Permit No.: AR0044016 & AR0044016C

Dear Mr. Cooper:

I have reviewed the response pertaining to my inspection of the North Central Unit WWTP. The information provided sufficiently addresses the items referenced in my inspection report. At this time, the Division has no further comment concerning this inspection. Acceptance of this response by the Division does not preclude any future enforcement action deemed necessary at this site or any other site.

If I require further information concerning this matter, I will contact you. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 837-2070 or you may email me travis.harmon@arkansas.gov.

Sincerely,

Travis Horman

Travis Harmon Inspector, Office of Water Quality