

Sarah Huckabee Sanders GOVERNOR Shane E. Khoury SECRETARY

October 17, 2024

Tracy Brick, Mayor City of Marion P.O. Box 717 Marion, AR 72364

Email Address: tracy.brick@marionarkansas.org

RE: City of Marion WWTP Inspection- PDS# 131664 and 131665 (Crittenden Co.)

AFIN: 18-00110 Permit No.: AR0021971 & ARR000189

Dear Mayor Brick:

On August 22, 2024, I performed a Compliance Evaluation Inspection and Industrial Stormwater 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 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 November 1, 2024.

If I can be of any assistance, please contact me at <u>Sarah.Frasher@arkansas.gov</u> or 870-935-7221 ext.-15.

Sincerely,

Sarah Frasher

Inspector, Office of Water Quality

Cc: Scott Marshall, Wastewater Superintendent, scott.marshall@marionarkansas.org



N OTHER:

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **18-00110** PERMIT #: **AR0021971** DATE: **8/22/2024**

COUNTY: **18 Crittenden** PDS #: **131664** MEDIA: **WN**

INCREATION INFORMATION

GPS LAT: 35.190278 LONG: -90.228333 LOCATION: Entrance

FACILITY INFORMAT	ION		INSPECTION INFORMATION				
NAME: City of Marion WWTP			facility type: 1 - Municipal		ECTOR ID#: 2347 S -	State	
LOCATION:			FACILITY EVALUATION RATING: INSPECTION TYPE:				ON TYPE:
5054 Hardin Road						oliance Evaluation	
CITY:			_	ENTRY TIM	ME: EXIT	TIME:	
Marion			` '	11:00	14	:15	PERMIT EFFECTIVE DATE: 1/1/2024
RESPONSIBLE OFFIC	CIAL	_					PERMIT EXPIRATION DATE:
NAME: / TITLE							12/31/2038
Tracy Brick / Mayor							
COMPANY:			FAYETTEVILLE SHALE RELATED: N				
City of Marion			FAYETTEVILLE SHALE VIOLATIONS: N				
P.O. Box 717			INSPECTION PARTICIPANTS				
CITY, STATE, ZIP:			NAME/TITLE/PHONE/FAX/EMAIL/ETC.:				
Marion AR 72364			Scott Marshall	/ Wat	er & Wa	stewat	er Superintendent
PHONE & EXT: / FAX:							-
1							
EMAIL:							
tracy.brick@marionarkansas.org							
CONTACTED DURING INSPECTION:	: No						
	LUATIONS						
		tory, M=Marginal, U=Unsat			_		
S PERMIT	S	FLOW MEASUR	REMENT			RMWA	
M RECORDS/REPORTS	S	LABORATORY			M FAC	ILITY S	ITE REVIEW
M OPERATION & MAINTENANCE	N	EFFLUENT/REG	CEIVING WATER	R I	M SELI	F-MON	ITORING PROGRAM
S SAMPLING	N	SLUDGE HAND	LING/DISPOSAL	_ [N PRE	TREAT	MENT

SUMMARY OF FINDINGS

The following violations were noted at the time of the inspection:

- 1. Improper Operation and Maintenance in violation of Part III, Section, B.1.a of the permit:
 - a. High vegetation was observed around the lagoon levees (Photos 2-6)
 - b. Duckweed accumulations were observed in the chlorine contact chamber (Photos 9-11).
 - c. The sump pump for the grab sample sink is no longer operational.
 - d. The chlorine pump is not working effectively due to the possibility of being installed incorrectly.
 - e. The facility is not maintaining an appropriate amount of freeboard in the lagoon. This is also in violation of Item 93.4 of 10 States Standards, in which the minimum freeboard requirement is 3 feet.
- 2. The facility is reporting Fecal Coliform Bacteria (FCB) in decimals instead of whole numbers. Corrected DMRs should be submitted as applicable. Please see the attached DMR Calculation Check for details.
- 3. The facility inaccurately calculated the 7-day average for BOD for the September 2023 DMR. The facility reported a 106 mg/L instead of 76 mg/L. Please ensure other calculations are reported correctly and submit corrected DMRs as applicable. Please see the attached DMR Calculation Check for details.

GENERAL COMMENTS

A CAO was drafted by Office of Water Quality Enforcement Branch on March 4, 2024. As part of the order, the operator sends quarterly updates including BOD percent removal and WET Testing results to DEQ.

The operator monitors the freeboard in the lagoons and discharges prior to rain in the forecast to allow them to maintain a higher water level.

An Audit Request Letter was given to the Operator, Scott Marshall, in which laboratory records will be sent and evaluated. The following parameters are performed by the facility: pH, DO, and TRC.

This inspection was performed in conjunction with a No-Exposure Industrial Stormwater Inspection for ARR000189. Please view PDS 131665 for details.

INSPECTOR'S SIGNATURE: Sarah Frasher	DATE: 09/19/2024
INSPECTOR'S SIGNATURE. Salah Flasher	DATE. 09/19/2024
SUPERVISOR'S SIGNATURE: Brest L. Walker	DATE: 10/15/2024

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: Whole numbers not used for reporting of FCB. 7-day average BOD for September 1	ber 2023 was miscalculated.
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	□y Øn □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: Duckweed observed in the chlorine contact chamber. High vegetation observe	d inside lagoon levees.
1. TREATMENT UNITS PROPERLY OPERATED:	□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 Øn □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 Øn □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ☑NA □NE

	ECTION D: SAMPLING	
	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
D	ETAILS:	
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:	Øy □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
	ECTION E: FLOW MEASUREMENT	
Р	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	⊠S □M □U □NA □NE
	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: <u>Yes</u> TYPE OF DEVICE: <u>Badger Met</u> Series M2000	er M- ✓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
S	ECTION F: LABORATORY	
Р	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
D	ETAILS:	
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: Waypoint	
	b. LAB ADDRESS: Memphis, AR	
	c. PARAMETERS PERFORMED: BOD, TSS, FCB, NO3+NO2-N, WET Testing	
8.	BIOMONITORING PROCEDURES ADEQUATE:	☑Y □N □NA □NE
	a. PROPER ORGANISMS USED:	Øy □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	SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS							
BASED ON	N VISUAL OBS	ERVATIONS (ONLY				IU ⊠NA □NE	
DETAILS:	No discharge							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001								
SECTION H	: SLUDGE DIS	POSAL						
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN [*]	TS		⊠s □m □	IU □NA □NE	
DETAILS:	Sludge stays in	the lagoon.						
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			□s □м	□U ☑NA □NE	
2. SLUDGE R	ECORDS MAINTAINED	O AS REQUIRED BY 4	O CFR 503:			□s □м	□U ☑NA □NE	
3. FOR LAND	. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):							
	SAMPLING IN							
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			IU ⊠NA □NE	
DETAILS:								
	OBTAINED THIS INSPE					□Y	□N ☑NA □NE	
2. TYPE OF S	AMPLE: GRAB:	COMPOSITE:_ N	METHOD: FREQUE	NCY:				
3. SAMPLES	PRESERVED:					□Y	□N ☑NA □NE	
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□Y	□N ☑NA □NE	
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE\	/ICE:				□N ☑NA □NE	
6. SAMPLE R	EPRESENTATIVE OF \	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□N ☑NA □NE	
7. SAMPLE S	PLIT WITH PERMITTER	E:					□N ☑NA □NE	
8. CHAIN-OF-	CUSTODY PROCEDUI	RES EMPLOYED:				□Y □N ☑NA □NE		
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□N ☑NA □NE	
	: STORM WATI							
	ATER MANAG			QUIREMENTS			IU ⊠NA □NE	
DETAILS:	See ARR00018	<u>9 PDS 131665 f</u>	or details.					
1. SWPPP UP	PDATED AS NEEDED:	_ DATE OF LAST UP	DATE:				□N ØNA □NE	
2. SITE MAP I	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:				□N ☑NA □NE	
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:					□N ☑NA □NE	
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED):				□N ☑NA □NE	
5. LIST OF PO	DTENTIAL POLLUTANT	r sources:					□N ☑NA □NE	
6. LIST OF PO	DTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:				□N ØNA □NE	
7. ALL NON-S	STORM WATER DISCH	ARGES ARE AUTHOR	RIZED:				□N ☑NA □NE	
8. LIST OF ST	RUCTURAL BMPS:						□N ØNA □NE	
9. LIST OF NO	ON-STRUCTURAL BMF	PS:					□N ☑NA □NE	
	PERLY OPERATED A						□N ØNA □NE	
11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:				□Y	□N ØNA □NE	

DMR Calculation Check

Reporting Period:	From	2024	05	01	_ To	2024	05	31
		Year	Month	Day		Year	Month	Day
Parameter Checked:		FCB	_					
						_		
		Loading				Concer	itration	
		Mass				Mon	thly	
	Mo.	Avg Ibs/c	lay	Mo. A	vg ı	mg/l	7-day Avg	j mg/l
Reported Value:		N/A		2	69.25		73.1	3
Calculated Value:		N/A			269		73	
Permit Value:		N/A			200		400)
					D	ifforonco	duo to not :	conorting
If calculated value do	es not e	equal repor	ted value, e	xplain:		ne whole r	s due to not i number.	eporting

DMR Calculation Check

Reporting Period:	From	2023	09	01	То	2023	09	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		BOD	-					
		Loading					ntration	
		Mass					nthly	
	Mo. A	Avg Ibs/d	ay	Mo. A	vg r	ng/l	7-day Avg	ı mg/l
Reported Value:		N/A			40		106	i
Calculated Value:		N/A			41		76	
Permit Value:		N/A			30		45	
If calculated value do	es not e	equal repor	ted value, e	explain:	C		s due to not the 7-day av	<u>/erage</u>

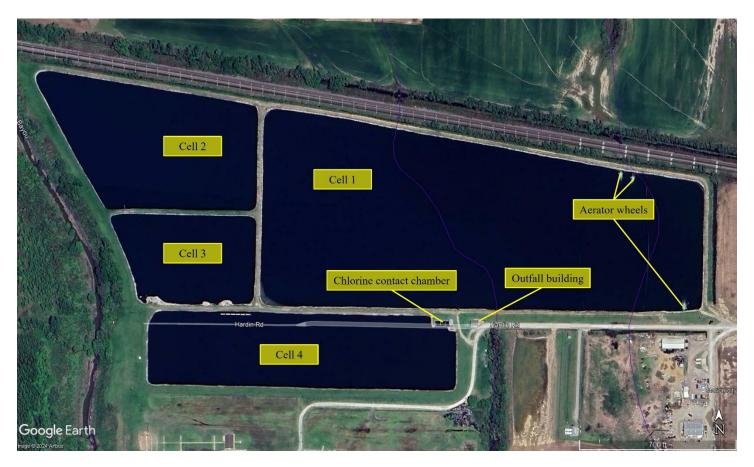
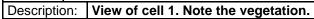


Figure 1. Google Earth image of the Marion WWTP with labels for the different areas of treatment.

Office of Water Quality Photographic Evidence Sheet							
Location: C	ity of Marion WWTP						
Photographe	r: Sarah Frasher	Date:	8/22/2024	Time:	12:33		
Witness: No	Witness: None Photo #: 1						
Description:	Description: View of the influent to the wastewater plant.						



Photographer: Sarah Frasher	Date: 8/2/2024	Time:	12:36
Witness: None		Photo #	: 2

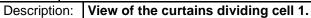




City of Marion WWTP Photographer: Sarah Frasher Witness: None Office of Water Quality Photographic Evidence Sheet Date: 8/22/2024 Fime: 12:49 Photo #: 3



Photographer:Sarah FrasherDate:8/22/2024Time:12:49Witness:NonePhoto #:4





City of Marion WWTP Photographer: Sarah Frasher Witness: None Office of Water Quality Photographic Evidence Sheet Date: 8/22/2024 Time: 12:53 Photo #: 5

Description: View of cell 3. Note the vegetation.



Photographer:Sarah FrasherDate:8/22/2024Time:13:00Witness:NonePhoto #:6

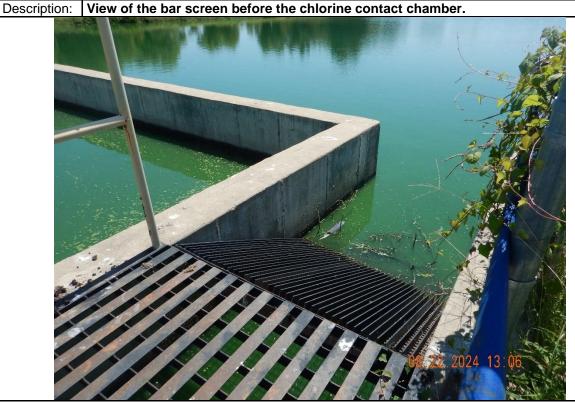
Description: View of cell 4.



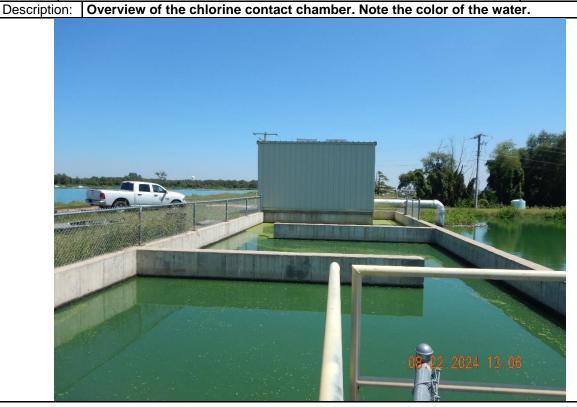
Office of Water Quality Photographic Evidence Sheet Location: City of Marion WWTP Photographer: Sarah Frasher Witness: None Date: 8/22/2024 Time: 13:06 Photo #: 7 Description: View of cell 4.



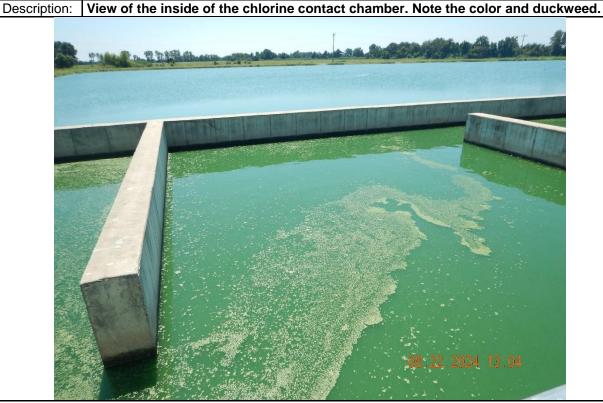
Photographer:Sarah FrasherDate:8/22/2024Time:13:06Witness:NonePhoto #:8



City of Marion WWTP Photographer: Sarah Frasher Witness: None Office of Water Quality Photographic Evidence Sheet Date: 8/22/2024 Time: 13:06 Photo #: 9



Photographer:Sarah FrasherDate:8/22/2024Time:13:04Witness:NonePhoto #:10



Office of Water Quality Photographic Evidence Sheet Location: City of Marion WWTP Photographer: Sarah Frasher Witness: None Date: 8/22/2024 Time: 13:03 Photo #: 11

Description: View of the duckweed in the chlorine contact chamber.

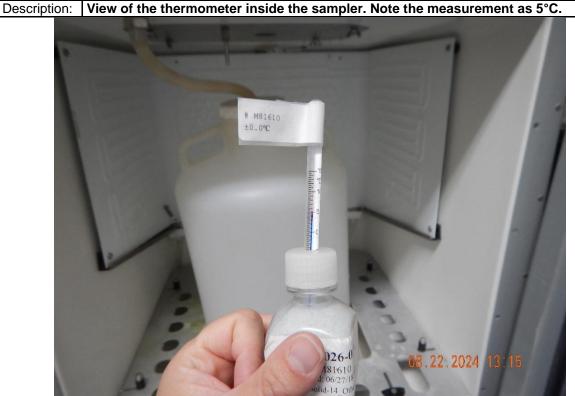
08.22,2024 13,03

Photographer: Sarah Frasher	Date:	8/22/2024	Time:	13:15
Witness: None			Photo #	: 12

Description: View of the inside of the sampler.



City of Marion WWTP Photographer: Sarah Frasher Witness: None Office of Water Quality Photographic Evidence Sheet Date: 8/22/2024 Time: 13:15 Photo #: 13



Photographer:Sarah FrasherDate:8/22/2024Time:13:16Witness:NonePhoto #:14



City of Marion WWTP Photographer: Sarah Frasher Witness: None Office of Water Quality Photographic Evidence Sheet Date: 8/22/2024 Time: 13:17 Photo #: 15

Description: View of the sink used for grab samples.



Photographer: Sarah Frasher	Date: 8	8/22/2024	Time:	13:21
Witness: None			Photo #:	16

Description: View of the chlorine gas bottles.



Office of Water Quality Photographic Evidence Sheet

Location: City of Marion WWTP

Photographer: Sarah Frasher Date: 8/22/2024 Time: 13:17

Witness: None

Description: View of the dechlorination equipment.