Richard Healey (adpce.ad)

From: Richard Healey (adpce.ad)
Sent: Monday, April 3, 2023 3:49 PM

To: 'whcm2@aol.com'

Cc: Leslie Allen-Daniel (adpce.ad)

Subject: City of Helena WWTP and Collection Sysrtem Inspections, NPDES Permit AR0043889 **Attachments:** AR0043389_Helena Collection System Inspection March 2 2022.pdf; AR0043389_Helena

WWTP Inspection March 22 2022.pdf

Calvin Murdock:

As we discussed, please see the attached DEQ March 2 & 22, 2022 Inspections of the wastewater treatment plant and collection system for the City of Helena.

DEQ never received a response to these inspection reports.

If you have any questions, please do not hesitate to contact me. Thanks

Richard C. Healey | Enforcement Branch Manager Office of Water Quality | Enforcement Branch Arkansas Energy and Environment | Environmental Quality 5301 Northshore Drive, North Little Rock, AR 72118 t: 501.682.0640 | e: Richard. Healey@adeq.state.ar.us





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,

Olava Sygol

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



PERMIT

SAMPLING

OTHER:

RECORDS/REPORTS

OPERATION & MAINTENANCE

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **54-00083** PERMIT #: **AR0043389** DATE: **3/22/2022**

COUNTY: **54 Phillips** PDS #: **120394** MEDIA: **WN**

STORMWATER

PRETREATMENT

FACILITY SITE REVIEW

SELF-MONITORING PROGRAM

GPS LAT: 34.49927 LONG: -90.636241 LOCATION: General Area

FACILITY INFORMATION	INSPECTION INFORMATION				
NAME: Helena WWTP LOCATION:	1 - Municipal INSPECTOR ID#: 142556 S - State				
Approx. 1.5 miles West of Hwy 20 on Hwy 44	1 - Unsatisfactor	ry	•	oliance Evaluation	
Helena, AR 72342	(-)	RY TIME: EXIT 1 2:40 13:		PERMIT EFFECTIVE DATE: 2/19/2021	
RESPONSIBLE OFFICIAL				PERMIT EXPIRATION DATE:	
NAME: / TITLE Kevin A. Smith / Mayor				2/28/2026	
COMPANY:	FAYETTEVILLE	SHALE REL	ATED:	N	
City of Helena-West Helena MAILING ADDRESS:	FAYETTEVILLE	SHALE VIOL	ATION	IS: N	
P.O. Box 248		PECTION P	ARTIC	IPANTS	
CITY, STATE, ZIP: Helena-West Helena AR 72342 PHONE & EXT. / FAX:	Oscar Donaby/o		whwate	er.com	
(870)753 8528 / EMAIL:					
mayor@helena-westhelena.us;					
odonaby@hwhwater.com					
CONTACTED DURING INSPECTION: No					
AREA EVA (S=Satisfactory, M=Marginal, U=Unsat	LUATIONS isfactory, N=Not Applicable/E	Evaluated)			

SUMMARY OF FINDINGS

EFFLUENT/RECEIVING WATER

SLUDGE HANDLING/DISPOSAL

FLOW MEASUREMENT

LABORATORY

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:

Ν

Z

- 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.

-			
	aro Bagos		
INSPECTOR'S SIGNATURE:		aron Baggett	DATE: 4/22/2022
	Kerri Mª Ca	ly	
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:	
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 Øn □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: <u>High levels in all lagoons.</u>	⊠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:	Øy □n □na □ne
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	ØY □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:	ØY □N □NA □NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	□Y ØN □NA □NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	□y Øn □na □ne
a. SAMPLES REFRIGERATED DURING COMPOSITING:	ØY □N □NA □NE
b. PROPER PRESERVATION TECHNIQUES USED:	ØY □N □NA □NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	ØY □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 measure	ement 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):	ØY □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:	ØY □N □NA □NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	ØY □N □NA □NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	ØY □N □NA □NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	ØY □N □NA □NE
7. COMMERCIAL LABORATORY USED:	ØY □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/R	•			o, Perriii #. ARUU4	13369	
	N VISUAL OBS			4110143		БДС ПМ Г	U □NA ☑NE
				lift station for I	Mississinni Diver		O DIVA BINE
OUTFALL #:	I			I	Mississippi River.	COLOR	OTUER
	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	*****	OTHER
001	NO	NO	NO	NO	NO	LIGHT	
SECTION L	I: SLUDGE DIS	DOS AI					
	DISPOSAL ME		EOI IIDEMENI	re			U □NA □NE
	Sludge retained		LQUINLIVILIN	10			IO LIVA LIVE
_	IANAGEMENT ADEQU		FILIENT OLIALITY:			Б∕Iс Пм	□U □NA □NE
	ECORDS MAINTAINED						□U ☑NA □NE
				AGRICUI TURAL PUI	BLIC CONTACT SITE): N/		LO BINA LINE
3. TORE 140	7(() EIED GEODGE, 1)	THE OF EMAD AND THE EIGH	3 TO: (E.O., TOREOT,	NOTHOGETOTIVE, I OF	5210 00117101 0112). <u>147</u>		
SECTION I	SAMPLING IN	SPECTION PRO	CEDURES				
	RESULTS WITH			·s		ПЅ ПМ Г	U ⊠NA □NE
DETAILS:	CEGGETO WITH	11141 2100111110	EGONTEMENT	<u> </u>			
	OBTAINED THIS INSPI	ECTION:				ПΥ	□n ☑na □ne
2. TYPE OF S	SAMPLE: GRAB:	COMPOSITE: N	METHOD: FREQUE	NCY:			
	PRESERVED:		<u></u>			ПΥ	□N ☑NA □NE
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:					□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 PERMITTEI	E:				□Y	□n Øna □ne
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				□Y	□N ☑NA □NE
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□N ☑NA □NE
SECTION J	: STORM WATI	ER POLLUTION	PREVENTION	PLAN			
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	3	⊠S □M □	IU □NA □NE
DETAILS:	Inspected unde	er IGP ARR00C4	136.				
1. SWPPP UF	PDATED AS NEEDED:_	_ DATE OF LAST UP	DATE:			□Y	□N ☑NA □NE
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			□Y	□N ☑NA □NE
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:				□Y	□N ☑NA □NE
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED):			□Y	□N ☑NA □NE
5. LIST OF PO	OTENTIAL POLLUTANT	Γ SOURCES:				□Y	□N ☑NA □NE
6. LIST OF PO	OTENTIAL SOURCES A	AND PAST SPILLS AND	D LEAKS:			□Y	□N ☑NA □NE
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:			□Y	□N ☑NA □NE
8. LIST OF ST	RUCTURAL BMPS:						□N ☑NA □NE
9. LIST OF NO	ON-STRUCTURAL BMF	PS:					□N ☑NA □NE
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:					□N ☑NA □NE
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				□Y	□N ØNA □NE
1							

DMR Calculation Check

01

2021

То

31

7

7

Parameter Checked:

Loading
Mass
Monthly
Mo. Avg. - Ibs/day

Year Month Day

Monthly

Monthly

Mo. Avg. - mg/l

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.

2021

From

Reporting Period:

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

DMR Calculation Check

Reporting Period: From 2021 01 01 To 2021 01 31

Year Month Day Year Month Day

Parameter Checked: BOD5

Loading Concentration **Monthly** Mass Mo. Avg. - Ibs/day Mo. Avg. - mg/l 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	
19	19.11	1.563	249.1068762	18.13
22	17.94	1.468	219.6415728	
25	13.68	1.606	183.2304672	
26	14.61	1.834	223.4681316	14.145
MONTHLY AVG	16.94	1.6453	228.7844527	



Photographer: Aaron Baggett Date: 3/22/2022 Time: 1250
Witness: Kerri McCabe Photo #: 2





Cocation: 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 BaggettDate:3/22/2022Time:1251Witness:Kerri McCabePhoto #:4

Description: Cell 2 overview; large ruts in levee in foreground; facing approximately north.



Office of Water Quality Photographic Evidence Sheet									
Location: I	lele	ena WWTP							
Photographe	er:	Aaron Baggett	Date:	3/22/2022	Time:	1251			
Witness: K	erri	McCabe			Photo #	: 5			
Description:	Description: Levee along eastern boundary of Cell 2; rut in levee in bottom left of photo; facing northeast.								



Photograph	ner: Aaron Baggett	Date:	3/22/2022	Time:	1255
Witness: K	Kerri McCabe			Photo #:	6

Description: Levee between Cells 3 and 4; facing northeast.



Cocation: 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.



Ī	Photographe	r: Aaro	n Baç	gett				Date:	3/2	2/202	22		Т	ïme:	1	256
	Witness: Ke	rri McCa	abe										Р	hoto#	<u>:</u> :	8
Г		111			 •	•						•				

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									
Photographe	: Aaron Baggett	Date:	3/22/2022	Time:	1304				
Witness: Kerri McCabe Photo #: 9									
Description:	Description: Levee between Cells 1 and 2; facing west.								



Photographer:Aaron BaggettDate:3/22/2022Time:1304Witness:Kerri McCabePhoto #:10





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

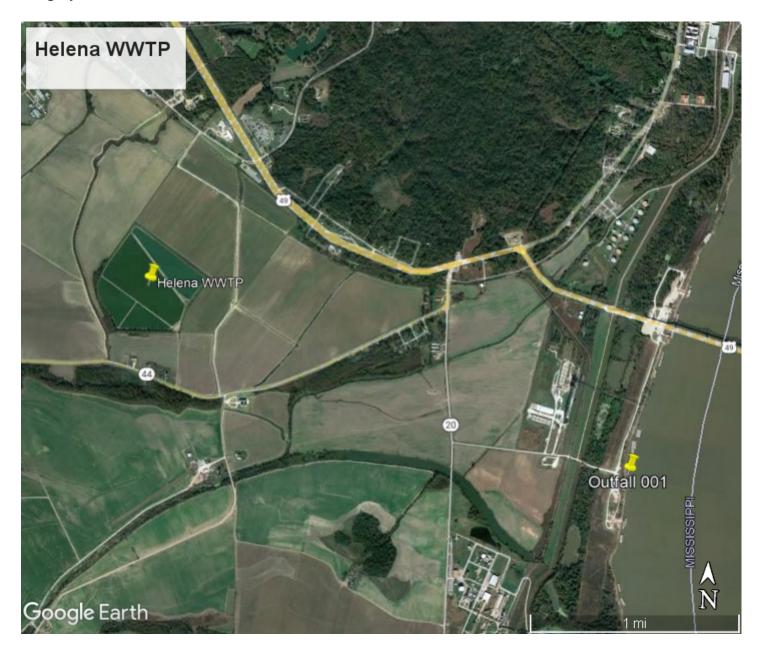


Figure 2. Google Earth image depicting components and simplified flow path of the Helena WWTP; satellite base imagery dated 11/11/2020.





April 18, 2022

Kevin A. Smith, Mayor City of Helena-West Helena P.O. Box 248 Helena, AR 72342

Sent Via Email To: mayor@helena-westhelena.us

RE: City of Helena Inspection

AFIN: 54-00083 Permit No.: AR0043389

Dear Mayor Smith:

On March 2, 2022, I performed a Collection System Evaluation/Sanitary Sewer Overflow 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 noted. This case has been referred directly to the Office of Water Quality Enforcement Branch for further review. The City of Helena-West Helena should immediately initiate all actions necessary to resolve and correct the alleged violations cited in the inspection report. Written notification of the corrective actions taken for the alleged 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 me at Bolenbaugh@adeq.state.ar.us or (501) 682-0659.

Sincerely,

Jason Bolenbaugh

Compliance Branch Manager, 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: **3/2/2022**

COUNTY: **54 Phillips** PDS #: **119870** MEDIA: **WN**

GPS LAT: 34.518709 LONG: -90.586323 LOCATION: General Area

FACILITY INFORMATION	INS	SPECTION I	NFORI	MATION	
City of Helena	FACILITY TYPE: INSPECTOR ID#: 83321 S - State				
LOCATION: Multiple Locations CITY:	facility evaluation rating 1 - Unsatisfacto	ON TYPE: Collection System			
Helena	· /	9:15 13:		PERMIT EFFECTIVE DATE: 3/1/2021	
RESPONSIBLE OFFICIAL				PERMIT EXPIRATION DATE:	
Kevin A. Smith / Mayor				2/28/2026	
COMPANY:	N				
City of Helena-West Helena MAILING ADDRESS:	FAYETTEVILLE	SHALE VIO	LATION	NS: N	
P.O. Box 248		SPECTION F	PARTIC	CIPANTS	
CITY, STATE, ZIP: Helena AR 72342 PHONE & EXT: / FAX: 870-817-7439 /	Jeff Patterson, General Manager, (870) 816-5251 Joey Williams, Maintenance, (870) 228-2874				
mayor@helena-westhelena.us CONTACTED DURING INSPECTION: No					
AREA EVA	LUATIONS				

atisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated) **PERMIT** STORMWATER FLOW MEASUREMENT **RECORDS/REPORTS FACILITY SITE REVIEW LABORATORY** ** OPERATION & MAINTENANCE **EFFLUENT/RECEIVING WATER** SELF-MONITORING PROGRAM U **SAMPLING** SLUDGE HANDLING/DISPOSAL **PRETREATMENT** OTHER:

SUMMARY OF FINDINGS

- On March 7, 2022, a request to Mayor Keven A. Smith and Mr. Jeff Patterson for additional information detailing specifics of the collection system was made but no response was provided. An additional request to Mayor Smith and Mr. Patterson was made on March 16, 2022. Again, no response was received. Failure to provide information is a violation of Part III, Section D.9 of the permit.
- According to Mr. Patterson, Pump Stations 3, 4, 5, and 6 all have bypass pumps installed at them
 because none of the two pumps located at each pump station are operational. The bypass pumps have
 been in place and used as the primary pumping mechanism for these pump stations for 1-2 years. The
 permittees failure to properly operate and maintain the pump stations is in violation of Part III, Section
 B.1.A of the permit.
- Pump Station 1 only had a single seventy-five horsepower pump that was operational at the time of the
 inspection. The control box for Pump 1 had failed, was removed from the wall, and was on the pump
 station floor at the time of the inspection. Failure to replace the control box is in violation of Part III,
 Section B.1.A of the permit.
- Pump stations lack emergency contact information in the event a member of the public identifies an overflow or pump station failure.
- An evaluation of all pump stations should be conducted using the latest edition of "10 State Standards

 Recommended Standards for Wastewater Facilities as a minimum standard for design and operation".

 Please provide a list of deficiencies for each pump station and a timeline for correcting each deficiency.

GENERAL COMMENTS

- The bypass pumps require operations staff to fill with diesel fuel twice per day so the pumps will continue to run over a 24-hour period. On average it requires 180 gallons of diesel fuel per day to operate a single 8-inch bypass pump. The permittee currently operates 4 bypass pumps in the City of Helena and one bypass pump in the City of West Helena. Those bypass pumps range in size from 4-inch to 10-inch.
- From January, 2019 to November, 2020 the permittee reported 63 SSOs. No SSOs have been reported since.
- The permittee should maintain inspection and maintenance records whenever inspections or maintenance occurs at the pump stations.
- This inspection was conducted following a complain investigation of a broken 12-inch sewer main located at Oak Forrest Drive. The broken sewer main discharged untreated wastewater to waters of the state. A SSO of a nearby manhole also occurred but was reported to the Office of Water Quality Enforcement Branch.

INSPECTOR'S SIGNATURE:	←Click text to left to add signatur	e -Inspector Name	DATE:
	Jan Rallabour		
SUPERVISOR'S SIGNATURE	. /	Jason Bolenbaugh	DATE: 4/18/2022

COLLECTION SYSTEM INSPECTION AND OVERALL RATING	□S □M ☑U □NA □NE					
PROVIDE A BRIEF DESCRIPTION OF THE COLLECTION SYSTEM: Permittee failed to provide additional information. The collection system has nine pump stations. Stations 1 and 5 discharge directly to the treatment ponds. Stations 3, 7, 8, and 9 pump to Station 4 which then pumps to Station 5. Station 6 discharges treated effluent to the Mississippi River.						
POPULATION SERVED/NUMBER OF RESIDENTIAL AND COMMERCIAL CONNECTION	NS: ~5,817					
FEET OF SEWER SYSTEM: Permittee failed to provide this information.						
AGE OF SYSTEM: Permittee failed to provide this information.						
DOES THE SYSTEM EXPERIENCE PROBLEMS DURING DRY OR WET WEATHER (EXPLAIN):	⊠Y □N □NA □NE					
IS THERE A SYSTEM IN PLACE FOR REPORTING SSOS TO ADEQ (DESCRIBE): From January, 2019 to November, 2020 the permittee reported 63 SSOs. No SSOs have be reported since.						
ARE ALL SSOs REPORTED REGARDLESS OF SIZE: SSOs ranged in size from 600 gallons to 42,000 gallons. No evidence suggests all SSOs have not been reported.	☑Y □N □NA □NE					
HAVE SSOs REACHED "WATERS OF THE STATE" (LIST DATE AND LOCATION OF EACH): Not all SSOs reported where the flows may have entered. Many noted the SS	Os					
did enter a ditch.						
PUMP STATIONS	□S □M ☑U □NA □NE					
NUMBER OF PUMP STATIONS IN SYSTEM: 9 NUMBER WITH BACKUP F	OWER: 0					
HOW OFTEN ARE PUMP STATIONS INSPECTED/MONITORED: It was explained the s	tations were inspected daily					
ARE MAINTENANCE RECORDS AND/OR OPERATOR LOGS KEPT: It was explained duthe pump stations but this was false.	aily logs were maintained in					
ADEQUATE INVENTORY OF SPARE PARTS: No spare parts are maintained.						
TYPE OF REMOTE ELECTRONIC MONITORING USED (I.E. SCADA OR AUTO DIALER 9 stations however, the status of the stations can only be read by the operating staff not available for monitoring remotely by off-duty staff.						
BRIEF SUMMARY OF EMERGENCY PROCEDURES: When problems are noted on the operations staff will respond accordingly to an issues.	SCADA or by the public the					
NUMBER OF PUMP STATIONS VISITED DURING INSPECTION (SEE ATTACHED CHE Pump Stations 1, 5, and 3.	CKLISTS FOR EACH): 3 -					
SATELLITE SYSTEMS	ØS □M □U □NA □NE					
DOES THE COLLECTION SYSTEM RECEIVE FLOW FROM SATELLITE SYSTEMS: Lor	ig Lake					
TYPE(S) OF WASTE WATER RECEIVED: MIRESIDENTIAL MICOMMERCIAL MINDUS	STRIAL OTHER:					
BRIEFLY DESCRIBE THE SATELLITE SYSTEM: Mostly residential but there are some wastewater is pumped to Station 5.	commercial users. All					
ANY KNOWN PROBLEMS WITH SATELLITE SYSTEM: No						
NAME, ADDRESS AND PHONE NUMBER OF PERSON RESPONSIBLE FOR SATELLIT	E SYSTEM: Not requested.					

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)						
GENERAL INFORMATION AND OVERALL EVALUATION	□S ØM □U □NA					
NAME AND/OR LOCATION OF PUMP STATION: Pump Station 1 (Location 34.518715, -90	.586334)					
TYPE(S) OF WASTE WATER RECEIVED: ØRESIDENTIAL ØCOMMERCIAL □INDUSTRIA	AL OTHER:					
NUMBER OF PUMPS: 2 NUMBER OPERATIONAL: 1 (P	ump #2)					
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: 75-hp	☑S □M □U □NA □NE					
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:	□Y ☑N □NA □NE					
not been replaced. Pump #1 run time was 14275.87 hours. Pump #2 run time was 24543.	Comments: Pump #1 was not operational at the time of the inspection because the control box has failed and has not been replaced. Pump #1 run time was 14275.87 hours. Pump #2 run time was 24543.90 hours. The last entry in the log book was made on May 13, 2021. Some solids were noted around the station but those could have been removed during maintenance and not properly disposed of					
GENERAL OPERATION AND MAINTENANCE	ØS □M □U □NA					
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	ØS □M □U □NA □NE					
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZED ACCESS AND/OR TAMPERING:	⊠S □M □U □NA □NE					
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTHERWISE PROTECTED:	⊠S □M □U □NA □NE					
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	☑S □M □U □NA □NE					
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, PULLEYS, DRIVESHAFTS, ETC.):	☑S □M □U □NA □NE					
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/OR GASES AND FUMES:	ØS □M □U □NA □NE					
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE:	☑S □M □U □NA □NE					
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT LEAKS:	⊠S □M □U □NA □NE					
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS:	☑S □M □U □NA □NE					
BACKUP POWER AND ALARMS	□S ØM □U □NA					
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP: Provisions are available for a portable generator to be connected.	☑S □M □U □NA □NE					
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POSTED: There are no audible or visual alarms.	□S □M □U ØNA □NE					
SCADA SYSTEM (LIST PARAMETERS MONITORED):	☑Y □N □NA □NE					
,	<u> </u>					

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)					
GENERAL INFORMATION AND OVERALL EVALUATION			S □M 🗹	JU □NA	
NAME AND/OR LOCATION OF PUMP STATION: Pump Sta	ntion 5 (Location 34.494466, -90.	.3612703)			
TYPE(S) OF WASTE WATER RECEIVED: MRESIDENTIAL	. ☑COMMERCIAL □INDUSTRIA	AL OTHE	ER:		
NUMBER OF PUMPS: 2	NUMBER OPERATIONAL: 0				
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: 60)-hp	□S □M	ØU □N	IA □NE	
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:		□Y	ØN □N	IA □NE	
Comments: This pump station does not have a permanent pump that is operational. According to staff a 6-inch bypass pump was delivered to this location before the 2021 calendar year. The bypass pump pumps water from the wet well into the pump stations emergency bypass pipe that then allows wastewater to flow to the treatment plant.					
GENERAL OPERATION AND MAINTENANCE			3 M C	IU ⊠NA	
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGEQUIPMENT:		□S □M		IA ⊠NE	
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:		□S □M		IA ØNE	
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:		□S □M		IA ØNE	
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIP INSTALLED AND MAINTAINED:	PMENT PROPERLY	□S □M		IA ØNE	
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT OF THE PROPERTY OF THE PRO	UIPMENT (BELTS, PULLEYS,	□S □M		IA ØNE	
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CO	NDENSATION AND/OR	□S □M		IA ØNE	
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE:	□S □M		IA ⊠NE	
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	□S □M		IA ØNE	
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V	VET WELLS:	□S □M		IA ⊠NE	
Comments: This station is not operational and therefore	this section was not evaluated.				
BACKUP POWER AND ALARMS			S DM Z	ÍU □NA	
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T	RANSFER PUMP:	□S □M		IA ⊠NE	
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT	INFORMATION POSTED:	□S □M	⊠U □N	IA □NE	
SCADA SYSTEM (LIST PARAMETERS MONITORED):			⊠N □N		
Comments: The light bulb for the visual alarm was not in If the station experiences a problem such as an overflow	the permittee relies on staff to				

tuel the bypass pump or if a nearby resident contacts them.

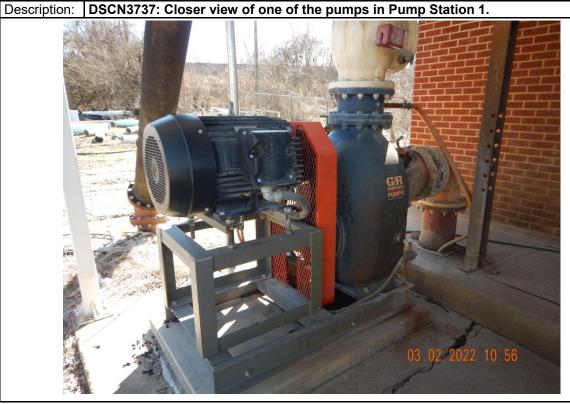
inspection report. Sity of freiend, At IIV. 54-00005, Fem	III //: 711100-10000				
PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)					
GENERAL INFORMATION AND OVERALL EVALUATION	□S □M ☑U □NA				
NAME AND/OR LOCATION OF PUMP STATION: Pump Station 3 (Location 34	.535115, -90.626676				
TYPE(S) OF WASTE WATER RECEIVED: ☑RESIDENTIAL □COMMERCIAL	□INDUSTRIAL □OTHER:				
NUMBER OF PUMPS: 2 NUMBER OPERA	FIONAL: 0				
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: 60-hp	□S □M ☑U □NA □NE				
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:	□Y ☑N □NA □NE				
Comments: This pump station does not have a permanent pump that is operational. According to staff an 8-inch bypass pump has been on site since at least March, 2021. The bypass pump pumps water from the wet well into the pump stations emergency bypass pipe that then allows wastewater to Pump Station 5. The permittee has been working on this pump station to install new internal components such as pump baring and impellers. In order to make the primary pump operational a baring will need replaced but Gorman Rupp needs to evaluate the secondary pump to determine what repairs need to made to it to make it operational.					
GENERAL OPERATION AND MAINTENANCE	□S □M ☑U □NA				
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	□S □M □U □NA ☑NE				
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZE ACCESS AND/OR TAMPERING:	LIS LIM LIU LINA MINE				
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTH PROTECTED:	ERWISE OS OM OU ONA MONE				
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	□S □M □U □NA ☑NE				
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, FDRIVESHAFTS, ETC.):	PULLEYS, OS OM OU ONA MINE				
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/GASES AND FUMES:	OR OS OM OU ONA MONE				
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE:	□S □M □U □NA ☑NE				
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT L	EAKS: DS DM DU DNA ØNE				
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS:	□S □M □U □NA ☑NE				
Comments: This station is not operational and therefore this section was no	t evaluated.				
BACKUP POWER AND ALARMS	□S □M ☑U □NA				
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP:	□S ØM □U □NA □NE				
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POS	STED: OS OM OU ONA ØNE				
SCADA SYSTEM (LIST PARAMETERS MONITORED):	ØY □N □NA □NE				
Comments: There is not a backup generator connection available at this state bypass pump to be delivered to the location in the event of an emergency.					

can still be monitored by SCADA at this location.

Office of Water Quality Photographic Evidence Sheet					
Location: Cit	y of Helena				
Photographer	Jason Bolenbaugh	Date:	3/22/2022	Time:	1047
Witness:				Photo #	: 1

Description: DSCN3726: Pump Station 1.

Witness:	Photo:	# : 2



City of Helena Photographer: Jason Bolenbaugh Witness: Description: DSCN3741: Pump station control panel and boxes (one missing). The control box (black box) for Pump 1 has been removed from the wall.



Photographer:	Jason Bolenbaugh	Date:	3/2/2022	Time:	1055
Witness:				Photo #	±: 4

Description: DSCN3736: Pump 1 control box on the floor of the pump station.

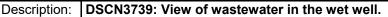


Office of Water Quality Photographic Evidence Sheet Location: City of Helena Photographer: Jason Bolenbaugh Date: 3/2/2022 Time: 1055 Witness: Photo #: 5

Description: DSCN3732: Wet well level reading at 4.1 feet.

MAIN MENUMERICAL LEVEL 4.1 FT
F1 = LEVEL SETPOINTS
F2 = HARM SETPOINTS
F3 = HARM SETPOINTS
F4 = PUMP MORE
F1 = PUMP MORE
F1 = PUMP MORE
F1 = PUMP MORE
MAIN MENUMERICAL
F3 = HARM SETPOINTS
F4 = PUMP MORE
F1 = PUMP MORE
MAIN MENUMERICAL
F3 = HARM SETPOINTS
F4 = PUMP MORE
MAIN MENUMERICAL
F3 = HARM SETPOINTS
F4 = PUMP MORE
F1 = PUMP MORE
MAIN MENUMERICAL
F3 = HARM SETPOINTS
F4 = PUMP MORE
MAIN MENUMERICAL
F3 = HARM SETPOINTS
F4 = PUMP MORE
MAIN MENUMERICAL
F3 = HARM SETPOINTS
F4 = PUMP MORE
MAIN MENUMERICAL
F3 = HARM SETPOINTS
F4 = PUMP MORE
MAIN MENUMERICAL
F3 = HARM SETPOINTS
F4 = PUMP MORE
MAIN MENUMERICAL
F3 = HARM SETPOINTS
F4 = PUMP MORE
MAIN MENUMERICAL
F5 = PUMP MORE
MAIN MENUMERICAL
MAIN MENUMERICAL
F5 = PUMP MORE
MAIN MENUMERICAL
MAIN M

Photographer: Jason Bolenbaugh Date: 3/2/2022 Time: 1057
Witness: Photo #: 6





City of Helena Photographer: Jason Bolenbaugh Witness: Description: DSCN3743: Overview of Pump Station 5. The pump station is in operable. The orange bypass pump has been used since before the 2021 calendar year.



Photographer: Jason Bolenbaugh	Date: 3/2/2022	Time:	1114
Witness:		Photo #:	8

Description: DSCN3744: Bypass pump used to pump wastewater from Pump Station 5 to the treatment plant.



Office of Water Quality Photographic Evidence Sheet						
Location: C	ity	of Helena				
Photographe	er:	Jason Bolenbaugh	Date:	3/2/2022	Time:	1118
Witness:					Photo #:	9

Description: DSCN3746: Visual alarm not in operation.



Photographe	r: Jason Bolenbaugh	Date:	3/2/2022	Time:	1138
Witness:				Photo #	: 10

Description: DSCN3748: View of Pump Station 3.



Office of Water Quality Photographic Evidence Sheet					
Location: City	of Helena				
Photographer:	Jason Bolenbaugh	Date:	3/2/2022	Time:	1138
Witness:				Photo #:	11

Description: DSCN3749: View of the bypass pump at Pump Station 3.



Photographer:	Jason Bolenbaugh	Date:	3/2/2022	Time:	1144
Witness:				Photo #:	: 12

Description: DSCN3750: Wastewater being pumped from the wet well (background) over to the pipe (foreground) sending wastewater to Pump Station 5.

