



October 10, 2012

Mr. Gary Hollis, Financial Director
City of Bryant
210 SW 3rd Street
Bryant, AR 72202

RE: MS4 Inspection

AFIN: 88-00831

NPDES Permit No.: ARR040008

Dear Mr. Hollis:

On October 2 and 3, 2012, Jamal Solaimanian, Supervisor, General Permits Branch, Eric Fleming, Inspection Branch Manager, Brenden Rose, Permit Engineer, and I performed a MS4 Audit on the City of Bryant. This Audit was performed in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following:

Overview of Findings: The City of Bryant has missed the goals for the implementation of the six minimum control measures as required by the permit and as outlined in the City's Storm Water Management Plan (SWMP). The City of Bryant has implemented portions of these requirements and has added staff to move forward with completion of reaching these goals. The record keeping and data management needs to be significantly improved. The City does not have good documentation of the activities already undertaken and there is currently no mechanism to manage the information that will be necessary to demonstrate the program is in compliance with permit standards. Specific findings and recommendations relative to each control measure can be found below:

1. **Public Education and Outreach** - Distributing educational materials and performing outreach to inform citizens about the impacts polluted storm water runoff discharges can have on water quality.
 - a. The City's SWMP Plan has 3 implementation areas: forming partnerships, using education materials and strategies, and reaching diverse audiences.
 - i. The City did not produce any documentation of partnerships being formed to assist in the implementation of this control measure item. Representatives indicated that they have obtained some educational materials from third party sources that will be available on the City's web site in the future.
 - ii. The City has developed a brochure that is being distributed, but the City has failed to document the extent of distribution (ie. – mailings, public meetings, etc.)

- iii. The City had no documentation of any activities relative to reaching diverse audiences. The SWMP lists several proposed activities to implement this item.
- b. The SWMP's measurable goals for Public Education and Outreach have not been achieved and/or documented. For instance, the SWMP measureable goal to be accomplished by May 2007 was to educate the public on the proper disposal of used motor oil. There is no indication this has been accomplished.

2. Public Participation/Involvement

- a. The SWMP's implementation plans include using traditional information sources to reach the public such as newspapers, radio, public posters or billboards, and civic meetings. The implementation plan also indicates efforts will be made to reach target audiences such as low income, minorities, business and industry groups, and educational institutions. The City could not produce documentation that anything has been done on this implementation area.
- b. Many of the SWMP's measureable goals for Public Participation/Involvement have been achieved through the public process for rulemaking necessary to pass the required ordinance. City representatives could not produce documentation that the SWMP was subject to the Public Participation process.

3. Illicit Discharge Detection and Elimination

- a. The implementation of this control measure includes several elements including development of a storm water conveyance system map, passage of an appropriate ordinance, developing a plan to detect non stormwater discharges, and education on the hazards of illicit discharges.
 - i. A map of the stormwater conveyance system has not yet been developed.
 - ii. The ordinance has been passed.
 - iii. The City could not produce its plan to detect illicit discharges.
 - iv. The City could not produce documentation on the education of the public on the hazards of illicit discharges.
- b. The City has failed to achieve the measureable goals on the illicit discharge detection and elimination except for the passage of the appropriate ordinance. The City does address illicit discharges when discovered, but the City has not implemented a comprehensive plan for detection of these illicit discharges such as dry weather inspections of the conveyance system. City representative indicated they have been checking restaurants to ensure they are not allowing stormwater from open dumpsters and grease bins, but could not produce documentation of these activities.

4. Construction Site Runoff Control

- a. The City has made significant progress on the implementation of this control measure. The SWMP indicates an appropriate ordinance will be passed which will include penalties and plan review. The city has implemented site inspections and has the ability to fine offenders and/or stop all work until violations are corrected.

- b. While the City has made significant progress on construction site runoff control, this progress is behind the measureable goals in the SWMP. With two (2) employees in the MS4 program helping implement this control measure virtually all of the measureable goals for this control element appear to have been achieved except the City could not produce documentation that seminars have been conducted for contractors. This measureable goal should have been achieved in 2008.

5. Post Construction Runoff Control

- a. The City's implementation of this element in the SWMP includes both structural and non-structural BMPs. The non-structural BMPs include city planning to promote appropriate development and use of site based local controls. Structural BMPs include storage, infiltration and vegetative practices. There is no documentation of how the City Planning process is being use on this control measure.
- b. The City's measurable goals in the SWMP for this control measure have been partially achieved:
 - i. The City has passed an ordinance that includes post construction language. Unfortunately, the language is vague and inappropriate.
 - ii. The City has a program for long term operation and maintenance of stormwater storage basins within the City.

6. Pollution Prevention/Good Housekeeping.

- a. The SWMP indicates this control measure will be implemented through development of an operation and maintenance plan for city properties and training of city employees on proper pollution prevention and good housekeeping techniques. The city had no documentation these elements were being implemented.
- b. The City's measureable goals for this control measure include development and implementation of a waste oil recycling and development and implementation of a waste control program.
 - i. The City did not produce documentation that these goals have been met.
 - ii. Inspections of the City's Public Works facility and City Parks and Recreation facility at Bishop Park confirmed that the city has failed to implement pollution prevention and good housekeeping at City facilities. Items noted during the site visits include eroding ground (silt and sediment leaving the property), sloppy disposal of waste oil, dilatory clean-up of hydrocarbon spills, illicit discharges, poor control of solid waste (litter) and improper operation of spill containment structures. In addition, the wastewater plant was in violation of their "No Exposure Certification" filed with ADEQ under NPDES tracking number ARR00C408. An equipment laydown yard on the treatment plant grounds has the potential to runoff the property rather than into the wastewater treatment plant.

- **Actions Required by the City of Bryant:**

1. The City of Bryant shall submit to ADEQ a comprehensive report on the implementation of the SWMP. This report shall detail the City's progress on the implementation of each of the measureable goals for each control measure in the SWMP.
2. The City shall revise the SWMP to include new deadlines and goals for those elements in the SWMP that have not yet been accomplished. Where appropriate, the City should revise elements of the SWMP that may be impractical or may be implemented in a manner more practical or efficient for the City. All revisions to the SWMP must meet the requirements of the permit and must be submitted to ADEQ for review.

- **Recommendations:**

1. The City should solicit input from the public and regulated community on any revision to the SWMP.
2. Priority should be given to the development of a map of the storm water conveyance system. This map is essential for the detection of illicit discharges and for the proper allocation of resources.
3. Stormwater pollution prevention plans should be developed for city properties that have the potential to impact the quality of stormwater runoff. Responsible individuals at these city properties should be trained on pollution prevention and good housekeeping. All employees should be trained on how their job impacts stormwater runoff. As we discussed with City representatives, incorporating elements of stormwater management in safety tailgate sessions is a very easy way to train employees on these items and helps to constantly reinforce the need for these elements.
4. The City needs to significantly improve recordkeeping and data management. A properly configured database program will greatly improve the City's ability to manage information on illicit discharges, construction sites, public outreach efforts and employee training. Much of this information is necessary to prove compliance with the permit. Proper information management can also help the City decide where best to use limited resources for this program.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by **October 24, 2012**. The response should include the anticipated date when the SWMP will be revised as requested above.

Mr. Gary Hollis, Financial Director
City of Bryant
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If I can be any assistance, please contact me at benson@adeq.state.ar.us or 501-683-0827. Specific questions relative to the permit, annual reports, or the SWMP should be directed to Mr. Brenden Rose (rose@adeq.state.ar.us) or 501-682-0619

Sincerely,

A handwritten signature in blue ink that reads "Dennis Benson". The signature is cursive and fluid.

Dennis Benson
District 9 Inspector
ADEQ Water Division

cc: Storm Water Section



Form Approved
OMB No. 2040-0003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code				NPDES							Yr/Mo/Day						Inspec. Type		Inspector		Fac. Type							
1	N	2	5	3	A	R	R	0	4	0	0	0	8	11	12	1	2	1	0	0	2	17	18	W	19	S	20	2
Remarks																												
Inspection Work Days					Facility Evaluation Rating					BI		QA		-----Reserved-----														
67				69	70	N				71	N	72	N	73				74	75							80		

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) Bryant City Hall 210 SW 3rd Street Bryant, AR 72202		Entry Time/Date 08:57 am on 10/02/12 09:04 am on 10/03/12	Permit Effective Date August 1, 2009
		Exit Time/Date 3:05 pm on 10/02/12 11:42 am on 10/03/12	Permit Expiration Date July 31, 2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and E-MAIL Doug Smith, Building Inspector Ben Wilson, Community Development Manager (bwilson@cityofbryant.com)			Other Facility Data PDS #068207
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Gary Hollis, Financial Director City of Bryant 210 SW 3rd Street Bryant, AR 72202		Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	


Section C: Areas Evaluated During Inspection

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

U	SWMP	U	Illicit Discharge program		Self-Monitoring Program		Sampling
U	Monitoring /Records/Reports	M	Construction Storm Water	N		N	Pollution Prevention /
M	Public Outreach	M	Post Construction			N	Multimedia
S	Public Participation	U	Municipal Operations PP	U	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

[illegible]

Name(s) and Signature(s) of Inspector(s)  Dennis Benson	Agency/Office/Telephone/Fax Arkansas Department of Environmental Quality	Date 10/03/12
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: STORM WATER MANAGEMENT PROGRAM (SWMP)

SWMP PROPERLY DEVELOPED AND IMPLEMENTED

☐S ☐M ☒U ☐NA ☐NE

DETAILS:

1. IS THE SWMP BEING ADEQUATELY ENFORCED? (3.1.1.) ☐Y ☒N ☐NA ☐NE
2. HAVE MEASURABLE GOALS FOR EACH BMP BEEN ESTABLISHED? (3.1.1.2) ☒Y ☐N ☐NA ☐NE
3. DOES THE MS4 DISCHARGE INTO AN IMPAIRED WATERBODY (303d)? (3.1.1.5) ☐Y ☒N ☐NA ☐NE
- IF SO, AND THE MS4 IS A CONTRIBUTOR, HAVE THE BMPs BEEN ENHANCED AS REQUIRED? (3.1.1.6) ☐Y ☐N ☒NA ☐NE
4. HAS A TABLE OF ORGANIZATION BEEN DEVELOPED? (3.1.1.3) ☒Y ☐N ☐NA ☐NE
5. WAS AN ANNUAL REVIEW OF THE SWMP PERFORMED AS REQUIRED? (3.4.1) ☒Y ☐N ☐NA ☐NE
6. DOES THE MS4 SHARE RESPONSIBILITY WITH ANOTHER ENTITY IN THE IMPLEMENTATION OF ANY REQUIRED MEASURES? (3.3) ☐Y ☒N ☐NA ☐NE
7. DOES THE MS4 DISCHARGE INTO A 303(d) LISTED WATERBODY? (3.4.5) IMPAIRMENT PARAMETER? ☐Y ☒N ☐NA ☐NE
8. ARE MEASURES BEING TAKEN TO IDENTIFY AND ELIMINATE THE LISTED POLLUTANT? (3.4.5) ☐Y ☐N ☒NA ☐NE

COMMENTS

SECTION B: MONITORING / RECORDKEEPING AND REPORTING

IS THE PERMITTEE KEEPING ALL MONITORING RECORDS AS REQUIRED

☐S ☐M ☒U ☐NA ☐NE

DETAILS:

1. WAS THE ANNUAL REPORT SUBMITTED BY THE DATE REQUIRED? (4.3.1) ☒Y ☐N ☐NA ☐NE
2. HAS A MONITORING PROGRAM BEEN DEVELOPED TO EVALUATE PROGRAM COMPLIANCE? (3.1) ☐Y ☒N ☐NA ☐NE
3. ARE MONITORING INFORMATION RECORDS, CALIBRATION AND MAINTENANCE RECORDS MAINTAINED? (4.2.1) ☐Y ☐N ☒NA ☐NE
4. HAVE STORM WATER SAMPLES BEEN COLLECTED AND ANALYZED? (3.5) ☐Y ☒N ☐NA ☐NE

COMMENTS

SECTION C: PUBLIC EDUCATION AND OUTREACH

IS THE PERMITTEE ADEQUATELY EDUCATING THE PUBLIC AS STATED IN THE SWMP?

☐S ☒M ☐U ☐NA ☐NE

DETAILS:

1. HAS THE PERMITTEE INFORMED THE PUBLIC ABOUT REDUCING STORM WATER POLLUTION? (3.2.1.1) ☒Y ☐N ☐NA ☐NE
- IF SO, HOW? Pamphlets, web site
2. HOW ARE MATERIALS DISTRIBUTED? (3.2.1.2) pamphlets at town hall meetings and local neighborhoods (not documented)
3. HAS A RATIONAL STATEMENT BEEN DEVELOPED AND IMPLEMENTED AS REQUIRED? (3.2.1.2) ☐Y ☒N ☐NA ☐NE
4. DOES THE PROGRAM INCLUDE MORE THAN ONE MECHANISM AND TARGET AT LEAST 5 THEMES? (3.2.1.3) ☒Y ☐N ☐NA ☐NE
5. DOES AT LEAST ONE THEME OR MESSAGE TARGET THE LAND DEVELOPMENT COMMUNITY (3.2.1.3) ☒Y ☐N ☐NA ☐NE

COMMENTS

SECTION D: PUBLIC INVOLVEMENT AND PARTICIPATION

IS THE PERMITTEE ADEQUATELY INVOLVING THE PUBLIC AS STATED IN THE SWMP?

☒S ☐M ☐U ☐NA ☐NE

DETAILS:

1. HAS THE PERMITTEE INVOLVED THE PUBLIC IN THE DEVELOPMENT AND SUBMITTAL OF THE NOI AND SWMP DESCRIPTION? (3.2.2.2.1) ☒Y ☐N ☐NA ☐NE
- IF SO, HOW? 4 town hall meetings (one in each city ward, city council meetings)
2. WHO ARE THE TARGET AUDIENCES FOR THE PUBLIC INVOLVEMENT PROGRAM? (3.2.2.2.3) general public
3. HAS THE PUBLIC INVOLVEMENT/PARTICIPATION PROGRAM INCLUDED FIVE PUBLIC ACTIVITIES AS REQUIRED?(3.2.2.3) ☒Y ☐N ☐NA ☐NE
4. WHAT ARE THE TYPES OF PUBLIC INVOLVEMENT ACTIVITIES INVOLVED IN THE PROGRAM?

COMMENTS

SECTION E: ILLICIT DISCHARGE DETECTION AND ELIMINATION

IS THE PERMITTEE ADEQUATELY ADDRESSING ILLICIT DISCHARGES AS STATED IN THE SWMP?

☐S ☐M ☒U ☐NA ☐NE**DETAILS:**

1. HAS A PROGRAM BEEN DEVELOPED TO ADDRESS AND IMPLEMENT ILLICIT DISCHARGES? (3.2.3.1)

☐Y ☒N ☐NA ☐NE

2. IS THE PROGRAM BEING ENFORCED AS NOTED IN THE SWMP? (3.2.3.3)

☒Y ☐N ☐NA ☐NE

3. WHAT ENFORCEMENT PROCEDURES ARE USED TO BRING VIOLATORS INTO COMPLIANCE? codes citations

4. HAS THE PERMITTEE DEVELOPED AN ADEQUATE STORM SEWER MAP IDENTIFYING ALL OUTFALLS? (3.2.3.2)

☐Y ☒N ☐NA ☐NE

5. HAS THE PERMITTEE INFORMED THE GENERAL PUBLIC OF HAZARDS ASSOCIATED WITH ILLEGAL DISCHARGES?(3235)

☐Y ☒N ☐NA ☐NE

6. HAS THE PERMITTEE DEVELOPED AND IMPLEMENTED A PLAN TO DETECT AND ELIMINATE NON-STORMWATER DISCHARGES, INCLUDING ILLEGAL DUMPING, INTO THE SYSTEM? (3.2.3.4)

☐Y ☒N ☐NA ☐NE

7. HAS A RATIONALE BEEN DEVELOPED THAT DOCUMENTS THE DECISION PROCESS FOR THE DEVELOPMENT OF A STORM WATER ILLICIT DISCHARGE DETECTION AND ELIMINATION SYSTEM? (3.2.3.8)

☐Y ☒N ☐NA ☐NE

8. HAS DRY WEATHER SCREENING OF ALL STORM WATER OUTFALLS LOCATED WITHIN THE MS4'S URBANIZED AREA OCCURRED AS REQUIRED BY THE PROGRAM? (3.2.3.10)

☐Y ☒N ☐NA ☐NE

9. DOES THE ANNUAL REPORT INCLUDE INFORMATION SUCH AS NUMBER OF ILLICIT DISCHARGES FOUND, AND THE NUMBER OF ILLICIT DISCHARGES ELIMINATED? (3.2.3.11)

☒Y ☐N ☐NA ☐NE**COMMENTS****SECTION F: CONSTRUCTION SITE STORM WATER RUNOFF CONTROL**

HAS THE PERMITTEE DEVELOPED, IMPLEMENTED AND ENFORCED A PROGRAM TO REDUCE POLLUTANTS FROM CONSTRUCTION SITES?

☒S ☐M ☐U ☐NA ☐NE

1. HAS AN ORDINANCE OR OTHER REGULATORY MECHANISM BEEN IMPLEMENTED TO REQUIRE EROSION AND SEDIMENT CONTROLS? (3.2.4.1.)

☒Y ☐N ☐NA ☐NE

2. HAVE ENFORCEMENT PROCEDURES BEEN DEVELOPED TO BRING CONSTRUCTION SITES INTO COMPLIANCE? (3.2.4.1)

☒Y ☐N ☐NA ☐NE

3. HAVE REQUIREMENTS BEEN DEVELOPED FOR THE CONTROL OF WASTES AT THE CONSTRUCTION SITE ? (3.2.4.1.3)

☒Y ☐N ☐NA ☐NE

4. HAVE PROCEDURES BEEN DEVELOPED FOR SITE INSPECTION AND ENFORCEMENT OF CONTROL MEASURES? (3.2.4.1.6)

☒Y ☐N ☐NA ☐NE

5. HAS A RATIONALE BEEN DEVELOPED THAT DOCUMENTS THE DECISION PROCESS FOR THE DEVELOPMENT OF A CONSTRUCTION SITE STORM WATER CONTROL PROGRAM? (3.2.4.2)

☒Y ☐N ☐NA ☐NE

6. ARE ALL SWPPPS (>1 ACRE) REVIEWED AS PART OF THE PRE-CONSTRUCTION SITE PLAN REVIEW? (3.2.4.3)

☒Y ☐N ☐NA ☐NE

7. ARE ALL SITES >1 ACRE INSPECTED MONTHLY TO ENSURE COMPLIANCE? (3.2.4.3)

☒Y ☐N ☐NA ☐NE

8. DOES THE ANNUAL REPORT INCLUDE INFORMATION SUCH AS NUMBER OF SWPPPS REVIEWED, NUMBER OF INSPECTIONS, NUMBER OF VIOLATION LETTERS ISSUED, NUMBER OF ENFORCEMENT ACTIONS, AND NUMBER OF COMPLAINTS? (3.2.4.4)

☒Y ☐N ☐NA ☐NE**COMMENTS****SECTION G: POST-CONSTRUCTION STORM WATER MANAGEMENT**

HAS THE PERMITTEE DEVELOPED, IMPLEMENTED AND ENFORCED A PROGRAM TO ADDRESS STORM WATER RUNOFF FROM NEW DEVELOPMENT OR REDEVELOPMENT?

☐S ☒M ☐U ☐NA ☐NE

1. HAS A STRATEGY BEEN DEVELOPED AND IMPLEMENTED WHICH INCLUDES A COMBINATION OF STRUCTURAL AND /OR NON STRUCTURAL BMP'S FOR THE COMMUNITY? (3.2.5.2)

☒Y ☐N ☐NA ☐NE

2. HAS A RATIONALE BEEN DEVELOPED THAT DOCUMENTS THE DECISION PROCESS FOR THE DEVELOPMENT OF A POST CONSTRUCTION SWMP? (3.2.5.5)

☒Y ☐N ☐NA ☐NE

3. DOES THE RATIONALE ADDRESS BOTH THE OVERALL POST-CONSTRUCTION SWMP, INDIVIDUAL BMP'S, MEASURABLE GOALS, AND WHO IS RESPONSIBLE FOR THE PROGRAM? (3.2.5.5)

☒Y ☐N ☐NA ☐NE

4. DOES THE ANNUAL REPORT INCLUDE THE NUMBER OF SITES REQUIRING POST CONSTRUCTION CONTROLS, NUMBER OF PRE- CONSTRUCTION PLANS REVIEWED, AND THE NUMBER OF INSPECTIONS PERFORMED TO ENSURE AS BUILT REQUIREMENTS? (3.2.5.7)

☐Y ☒N ☐NA ☐NE

5. DOES THE PROGRAM CONTAIN LOW IMPACT DEVELOPMENT AND GREEN INFRASTRUCTURE WAIVERS? (3.2.5.8)

☐Y ☒N ☐NA ☐NE**COMMENTS** The City of Bryant needs to incorporate data collection from their storm water storage management into the SWMP and annual reports to ADEQ

SECTION H: POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

HAS THE PERMITTEE DEVELOPED AND IMPLEMENTED A PROGRAM TO REDUCE POLLUTION FROM MUNICIPAL OPERATIONS? ☐S ☐M ☒U ☐NA ☐NE

1. DOES THE PROGRAM INCLUDE EMPLOYEE TRAINING TO PREVENT AND REDUCE STORM WATER POLLUTION FROM PUBLIC OPERATIONS? (3.2.6.2) ☐Y ☒N ☐NA ☐NE

2. DOES THE PERMITTEE HAVE A LIST OF INDUSTRIAL FACILITIES OWNED BY THE MS4 THAT ARE SUBJECT TO ADEQ GENERAL STORM WATER PERMIT REQUIREMENTS? (3.2.6.2) ☐Y ☒N ☐NA ☐NE

3. IS THE ADEQ PERMIT NUMBER OR COPY OF THE INDUSTRIAL STORM WATER NOI INCLUDED? ☐Y ☒N ☐NA ☐NE

4. DO MUNICIPAL FACILITIES NOT REQUIRED TO OBTAIN PERMIT COVERAGE ALL HAVE AN IMPLEMENTED SWPPP? ☐Y ☒N ☐NA ☐NE

5. HAS AN O&M PROGRAM BEEN IMPLEMENTED TO PREVENT OR REDUCE POLLUTANT RUNOFF FROM MUNICIPAL OPERATIONS? ARE THE MUNICIPAL OPERATIONS THAT ARE AFFECTED BY THE O&M PROGRAM LISTED AS REQUIRED? (3.2.6.1) ☐Y ☒N ☐NA ☐NE

6. ARE MAINTENANCE ACTIVITIES, MAINTENANCE SCHEDULES, AND LONG-TERM INSPECTION PROCEDURES FOR CONTROLS TO REDUCE FLOATABLES AND OTHER POLLUTANTS TO THE MS4 SPECIFIED AS REQUIRED? (3.2.6.3.1) ☐Y ☒N ☐NA ☐NE

COMMENTS There appears to be very little going on to prevent the discharge of pollutants from City properties. Employees at these facilities have not been trained on the requirements of the SWMP and how their activities impact stormwater.

MS4 MAINTENANCE FACILITY INSPECTION

NAME OF PUBLIC FACILITY Public Works Facility

ADDRESS OF FACILITY 1017 SW 2nd Street

DATE AND TIME OF VISIT 10/02/12 @ 2:04 pm

FACILITY CONTACT (NAME, TITLE AND PHONE NUMBER): Leon Black, Doug Smith, and Ben Wilson

- | | |
|--|--|
| 1. HAS THE FACILITY DEVELOPED AND IMPLEMENTED A SWPPP OR STORMWATER PLAN? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. DOES THE PLAN INCLUDE A SITE MAP, LIST OF POLLUTANT SOURCES, BMP'S, AND MAINTENANCE PROCEDURES? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. DOES THE PERMITTEE CONDUCT AND DOCUMENT PERIODIC INSPECTIONS OF THE FACILITY? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ARE STORM DRAINS LABELED, FREE OF DEBRIS, AND IN GOOD CONDITION? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. ARE VEHICLE MAINTENANCE ACTIVITIES CONDUCTED IN A DESIGNATED PLACE NOT EXPOSED TO STORM WATER? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. ARE FUELING STATIONS PROPERLY DESIGNED WITH SPILL KITS NEARBY? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. ARE VEHICLES WASHED ON SITE? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| IF SO, IS THE WASH WATER DISCHARGED TO THE MS4 OR THE SANITARY SEWER? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. ARE ALL MATERIALS THAT ARE POTENTIAL STORM WATER CONTAMINANTS STORED UNDER COVER OR IN SECONDARY CONTAINMENT? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. ARE ALL HAZARDOUS MATERIALS PROPERLY LABELED AND STORED TO PREVENT EXPOSURE TO STORM WATER? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 10. ARE WASTE BINS PROPERLY COVERED AND ARE WASTES PROPERLY DISPOSED? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 11. HOW IS LANDSCAPE WASTE STORED? | |
| 12. WHAT TYPE OF STORM WATER TRAINING DOES THE FACILITY STAFF RECEIVE? None | |

INSPECTION COMMENTS: This site had eroding ground that was discharging silt and sediment offsite, there were minor amounts of litter on the grounds that are not being policed, a fuel containment structure onsite had the valve left open, waste oil was stored exposed, there was a significant amount of waste oil spillage that had not been cleaned up expeditiously, waste oil filters were not contained and stored in an area exposed to precipitation, an employee was noted using a degreaser and a water hose outside where the water will runoff to storm water system. Additionally, a small equipment laydown yard on the treatment plant grounds was situated where runoff will leave property, which void the "No Exposure Certification", NPDES Tracking Number ARR00C408.

MS4 MAINTENANCE FACILITY INSPECTION PHOTO PAGE**LOCATION** City of Bryant Public Works**PHOTOGRAPHER** Dennis Benson**DATE / TIME** 10/02/12 @ 2:16 pm**DESCRIPTION:** Waste oil collection. Note the significant amount of spillage that has not been cleaned up and the used oil filters stored on top of the holding tank.**LOCATION** City of Bryant Public Works**PHOTOGRAPHER** Dennis Benson**DATE / TIME** 10/02/12 @ 2:07 pm**DESCRIPTION:** Barren ground that is eroding resulting in the discharge of silt and sediment.

LOCATION City of Bryant Public Works

PHOTOGRAPHER Dennis Benson

DATE / TIME 10/02/12 @ 2:35 pm

DESCRIPTION: This degreaser was being applied to parts outside and then rinsed off and into stormwater conveyance.



LOCATION City of Bryant Public Works

PHOTOGRAPHER Dennis Benson

DATE / TIME 10/02/12 @ 2:35 pm

DESCRIPTION: Concrete stained from failure to properly clean up hydrocarbon spills.



LOCATION City of Bryant Public Works**PHOTOGRAPHER** Dennis Benson**DATE / TIME** 10/02/12 @ 2:35 pm**DESCRIPTION:** Stormwater outfall from the public works yard. Silt and sediment are being conveyed off site through this outfall.**LOCATION** City of Bryant Public Works**PHOTOGRAPHER** Dennis Benson**DATE / TIME** 10/02/12 @ 2:35 pm**DESCRIPTION:** Sediment plume offsite from eroding ground at the public works complex.

MS4 MAINTENANCE FACILITY INSPECTION

NAME OF PUBLIC FACILITY Parks and Recreation, Bishop Park

ADDRESS OF FACILITY Bishop Park on Boone Road

DATE AND TIME OF VISIT 10/02/12 @ 2:45 pm

FACILITY CONTACT (NAME, TITLE AND PHONE NUMBER) Doug Smith, and Ben Wilson

- | | |
|--|--|
| 1. HAS THE FACILITY DEVELOPED AND IMPLEMENTED A SWPPP OR STORMWATER PLAN? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. DOES THE PLAN INCLUDE A SITE MAP, LIST OF POLLUTANT SOURCES, BMP'S, AND MAINTENANCE PROCEDURES? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. DOES THE PERMITTEE CONDUCT AND DOCUMENT PERIODIC INSPECTIONS OF THE FACILITY? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ARE STORM DRAINS LABELED, FREE OF DEBRIS, AND IN GOOD CONDITION? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. ARE VEHICLE MAINTENANCE ACTIVITIES CONDUCTED IN A DESIGNATED PLACE NOT EXPOSED TO STORM WATER? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. ARE FUELING STATIONS PROPERLY DESIGNED WITH SPILL KITS NEARBY? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. ARE VEHICLES WASHED ON SITE? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| IF SO, IS THE WASH WATER DISCHARGED TO THE MS4 OR THE SANITARY SEWER? | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. ARE ALL MATERIALS THAT ARE POTENTIAL STORM WATER CONTAMINANTS STORED UNDER COVER OR IN SECONDARY CONTAINMENT? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. ARE ALL HAZARDOUS MATERIALS PROPERLY LABELED AND STORED TO PREVENT EXPOSURE TO STORM WATER? | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| 10. ARE WASTE BINS PROPERLY COVERED AND ARE WASTES PROPERLY DISPOSED? | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 11. HOW IS LANDSCAPE WASTE STORED? Unprotected pile of wood chips noted on park grounds. | |
| 12. WHAT TYPE OF STORM WATER TRAINING DOES THE FACILITY STAFF RECEIVE? None | |

INSPECTION COMMENTS: This site had some litter around maintenance building. Solid waste recycling bins are stationed here, which is contributing to the litter issue primarily due to plastics which can easily float or blow away. A small hydrocarbon spill that occurred under roof has not been cleaned up expeditiously. At the back of the facility was a pile of wood waste chips that are slowly composting. This could require a solid waste permit, if allowed to remain in place. Composting wood waste can release a leachate that is high in COD. This facility is in close proximity to Hurricane Creek.

LOCATION City of Bryant, Bishop Park**PHOTOGRAPHER** Dennis Benson**DATE / TIME** 10/02/12 @ 2:48 pm**DESCRIPTION:** Ground under roof that has been stained from a hydrocarbon spill that was not cleaned up expeditiously.**LOCATION** City of Bryant, Bishop Park**PHOTOGRAPHER** Dennis Benson**DATE / TIME** 10/02/12 @ 3:02 pm**DESCRIPTION:** Pile of wood waste chips that needs to be cleaned up or the City should seek a solid waste permit for composting.

CONSTRUCTION SITE INSPECTION REPORT

PROJECT NAME Bryant Skilled Nursing

ADDRESS OF PROJECT 6909 Hwy 5 N, Bryant, AR

SIZE OF PROJECT 4.2 acres

DATE AND TIME OF VISIT: 10/03/12 @10:15 am

ADEQ PERMIT # by rule, NOC not posted

NAME OF PERMITTEE'S INSPECTOR(S) Jerry Williams, Superintendent

PROVIDE THE NAME(S) AND TITLE(S) OF SITE SUPERINTENDENT PRESENT DURING THE INSPECTION

NAME

TITLE AND PHONE NUMBER

Dion McGuire

Stormwater Inspector 501-909-0371

Lance Gamble

Stormwater Laborer 501-303-0217

INSPECTOR TRAINING / KNOWLEDGE

1. WHAT TYPE(S) OF STORM WATER TRAINING DID THE INSPECTOR RECEIVE? Attended City of Hot Springs training

2. IS THE INSPECTOR FAMILIAR WITH THE REQUIREMENTS OF THE STATE STORM WATER CONSTRUCTION GENERAL PERMIT?

☐Y ☒N ☐NA ☐NE

3. IS THE INSPECTOR KNOWLEDGEABLE ABOUT EROSION AND SEDIMENT CONTROL BMP'S?

☒Y ☐N ☐NA ☐NE

4. IS THE INSPECTOR KNOWLEDGEABLE ABOUT STORM WATER / POLLUTION PREVENTION BMP'S?

☐Y ☒N ☐NA ☐NE

5. IS THE INSPECTOR KNOWLEDGEABLE ABOUT LOCAL STORM WATER REQUIREMENTS AND LEGAL AUTHORITY?

☒Y ☐N ☐NA ☐NE

INSPECTION PROCEDURES

1. IS AN INSPECTION CHECKLIST USED?

☒Y ☐N ☐NA ☐NE

2. IS THE INSPECTOR AWARE OF PREVIOUS STORM WATER INSPECTION RESULTS AT THIS SITE?

☒Y ☐N ☐NA ☐NE

3. DOES THE INSPECTOR REVIEW THE APPROVED PLANS REQUIRED TO BE AT THE CONSTRUCTION SITE?

☒Y ☐N ☐NA ☐NE

4. DOES THE INSPECTOR WALK THE ENTIRE SITE AND INSPECT ALL POINTS OF DISCHARGE?

☒Y ☐N ☐NA ☐NE

5. DOES THE INSPECTION ADDRESS EROSION AND SEDIMENT CONTROLS?

☒Y ☐N ☐NA ☐NE

6. DOES THE INSPECTION ADDRESS WASTE MANAGEMENT PRACTICES?

☒Y ☐N ☐NA ☐NE

7. DOES THE INSPECTION ADDRESS NON-STORM WATER DISCHARGES?

☒Y ☐N ☐NA ☐NE

8. DID THE INSPECTOR MISS OBVIOUS VIOLATIONS?

☒Y ☐N ☐NA ☐NE

9. ARE THE INSPECTION FINDINGS DOCUMENTED IN WRITING AND PRESENTED TO THE SITE CONTACT? via USPS

☒Y ☐N ☐NA ☐NE

COMPLIANCE / ENFORCEMENT

1. HOW DOES THE INSPECTOR ADDRESS NON-COMPLIANCE ISSUES? Warning letter

2. IF NON-COMPLIANCE ISSUES ARE FOUND, IS A DEADLINE GIVEN FOR CORRECTION? Bryant will initiate

☐Y ☒N ☐NA ☐NE

EDUCATION

1. ARE ANY MATERIALS OR BROCHURES GIVEN TO THE FACILITY CONTACT TO EDUCATE THEM ABOUT APPROPRIATE BMP'S?

☐Y ☒N ☐NA ☐NE

INSPECTION COMMENTS – This site was permitted as a small site at 4.2 acres, but that did not include linear associate project of bringing sewer main to project. Facility was told to recalculate acreage and file NOI with ADEQ if necessary. Problems with improperly installed silt fencing was also noted. Silt and sediment have gotten offsite. Bryant's inspectors during previous visit had some silt fencing repaired, but failed to get permittee to remove and return sediment that has gotten offsite.

CONSTRUCTION SITE INSPECTION PHOTO PAGE**PROJECT NAME** Bryant Skilled Nursing**LOCATION** 6909 Hwy 5, Bryant**PHOTOGRAPHER** Dennis Benson**DATE / TIME** 10/03/12 @ 10:31 am**DESCRIPTION** View of construction site BMPs. Note ash from burning of wood waste is in flow path of stream that goes through property.**PROJECT NAME** Bryant Skilled Nursing**LOCATION** 6909 Hwy 5, Bryant**PHOTOGRAPHER** Dennis Benson**DATE / TIME** 10/03/12 @ 10:21 am**DESCRIPTION** Silt and sediment has gotten offsite and has not been removed and returned to the site.

OUTFALL VISUAL INSPECTION REPORT

OUTFALL LOCATION Cox Canal on Shobe Road.

LAT/LONG 34 37 06.73 N, -92 27 37.12 W.

DATE / TIME 10/03/12 @09:35 am

PREDOMINANT WATERSHED LAND USE: residential and agriculture

EVALUATOR Eric Fleming

DATE OUTFALL LAST INSPECTED BY PERMITTEE never

DAYS SINCE LAST RAINFALL ~4 days (9/30/12)

INCHES less than 1"

OUTFALL DESCRIPTION

END OF PIPE DIAMETER ~ 30" box culvert

PIPE MATERIAL concrete

 OPEN CHANNEL ☒Y ☐N

1. IS THE OUTFALL SUBMERGED?

☐Y ☒N ☐NA ☐NE

 2. WHAT IS THE CONDITION OF THE OUTFALL STRUCTURE? Structure needs repair due to past floods
VISUAL OBSERVATION

 1. WATER FLOW VOLUME ☐NONE ☒LOW ☐MODERATE ☐HIGH ☐INTERMITTENT

 2. WATER FLOW COLOR ☒CLEAR ☐MUDDY ☐MILKY OR CLOUDY ☐OIL SHEEN ☐SOAPY /FOAMY ☐OTHER

 3. DEBRIS IN PIPE ☒NONE ☐SEDIMENT ☐TRASH ☐OTHER some floatables

 4. WATER FLOW ODOR ☒NONE ☐PETROLEUM ☐SEWAGE / H2S ☐OTHER

5. IS DEBRIS FROM THE OUTFALL PRESENT IN THE RECEIVING STREAM?

☒Y ☐N ☐NA ☐NE

6. STAINING AND SCUM PRESENT

☐NONE ☒IRON OXIDE ☐WHITE ☐GREEN ALGAE ☐OILY SCUM

OUTFALL INSPECTION COMMENTS – Outfall had a small log jam and sediment accumulation. Sediment accumulation is probably due to the City's channelization of upstream portions of the stream to address flooding in the area back in 2008.

OUTFALL PHOTO

DATE / TIME 10/03/12 @ 09:39 am



RECEIVED

OCT 24 2012

Kr 9:23

City of Bryant
Report on the Implementation of the Current SWMP for the
Control Measure Goals & Progress of Completion

Under the first minimum control measure of Public Education and Outreach, we have three main action areas listed: first Forming Partnerships with governmental and non governmental organizations, second Using Educational Materials and Strategies and third Reaching Diverse Audiences.

The Measurable Goals and completion of them is as follows: 1.) Pamphlets have been made addressing pollution prevention measures that cover a broad spectrum of activities and target audiences. Those pamphlets have been distributed door-to-door and made available on the city website. 2.) The SWMP (Storm Water Management Plan) has been developed, but currently needs to be reviewed and updated to match current situation. 3.) The Best Management Practices Manual has been developed and is made available through the city website and when requested via e-mail, standard mail or in person, most often through planning meetings. 4.) The outreach plan of educating the public on the proper disposal of used motor oil through seminars has not been achieved. This will be reviewed as part of the process of updating the SWMP.

Going back to the three main action areas, the completion of the current elements are as follows: Forming Partnerships - We have received support with employee training from the Stormwater Department in Hot Springs Arkansas. I have used them as a model as well as other Arkansas stormwater programs and some outside the state to gain ideas for training videos, stormwater mapping and BMPs. Partnerships need to be expanded to include more local groups. Using Educational Materials and Strategies - As mentioned, we do have the pamphlets in use. Also, there are alternative sources as well on the city website under the Stormwater Department page. These include written BMP tips and educational BMP videos for both private and commercial application. The website page also lists my direct number for stormwater issues. Other alternative education involves face to face instruction and Q&A at commercial site visits which focus on proper dumpster operation/trash pick-up, booths at public events such as town hall meetings and related workshops. Some tributary signage has been placed along streets. Areas not complete in the SWMP include recreational guides, tributary sign posting, a library of educational materials, volunteer citizen educators, and storm drain stenciling. The last area is Reaching Diverse Audiences. Our approach of website availability and pamphlet distribution has been a blanket approach to reach as many people as possible regardless of age or race. Booths at town hall meetings and "in-field" service calls and training sessions have reached a cross section of people throughout the city. However, there has not been a program specifically designed to reach one certain minority, disadvantaged group or age group, such as children.

Public Participation/Involvement which allows the public to provide valuable input and assistance to the Stormwater/MS4 program. The website provides a means for citizens to connect and contribute to the Stormwater program through contact information in the form of telephone numbers and e-mail addresses to stormwater management. There are also opportunities to receive feedback from the public on the in-field service calls that MS4 personnel perform, the town hall meetings MS4 personnel have attended and the inspections MS4 personnel perform on residential, commercial and construction sites. As far as providing a formal, interactive public workshop to assist in building the components of the MS4 program, this has not been achieved.

Illicit Discharge Detection and Elimination has not been fully achieved due to the fact that we have not fully completed the mapping process for the stormwater major outfalls leaving Bryant. Watersheds have been mapped, major tributaries have been labeled and mapped, detention basins have been identified and mapped and major utilities including sanitary sewer lines have been mapped throughout the city in our G.I.S. system, a pamphlet has been developed and put into use addressing illicit discharge, a point of contact has been provided on the city website for reporting illicit discharges for the public, Stormwater Ordinance 2011-28 has been completed and implemented which includes prohibition of illegal dumping, the list of non-storm water discharges prohibited from the storm sewer system has been developed and is included in the ordinance under "pollutant". All of these measures will help in our illicit discharge detection program. However, the detailed mapping of the flows and outfalls of all ditches, gutters, underground stormwater drainage systems and other waterways have not been completed which would allow for the source detection of illicit discharges. We are in the process devising a plan to best complete this task efficiently and economically. The other current goals which have not been completed include: develop a program to reduce the number of failing septic systems, provide a SWPPP and training plan for pertinent city facilities in order to educate on illicit discharge prevention and development of an education program for city agencies.

Construction Site Runoff Control is being met by the passage and enforcement of Stormwater Ordinance 2011-28 and by the development of and adherence to the standards spelled out in the City of Bryant Stormwater Management Manual. Through the departments of Code Enforcement and Stormwater/MS4, inspections of construction sites and penalties are administered. The Site Plan review and submittal process including the coverage of BMPs through proper SWPPP submittals are addressed during the DRC meetings (Development Review Committee) which is held on a weekly basis. In these meetings, personnel from the appropriate departments of city government including Engineering, Code Enforcement and Stormwater, review the project to assure all requirements are met in the Stormwater Ordinance and Stormwater Management Manual. This is including the incorporation of erosion and sediment control measures spelled out in the stormwater ordinance and manual. The city is also providing for information input from the public through published contact information on the departments of Code Enforcement and Stormwater both in print, the city website and public meetings. The areas that have not been fully addressed or completed include: conducting educational seminars for contractors on waste associated with their profession that has an

adverse affect on water quality. These topics have and are being addressed with all contractors and builders in Bryant in a one-on-one manner but not in a seminar type, group setting. The goal of developing a contractor certification program has not been met.

Post-Construction Runoff Control is currently being addressed through inspections of construction sites and completed detention basins that have been approved by all appropriate city officials during the review and inspection process. The post construction inspections of the sites and detention basins are to assure that the stormwater control mechanisms are being maintained properly which includes removal of debris and overgrown vegetation inside the systems. If a problem is discovered the owner is notified by certified mail with instructions on what is expected to correct the situation. All large construction projects that require permanent runoff controls such as detention basins are required to submit a maintenance plan of said structures detailing a schedule of what will be done to keep the structure in good working order. All of these details of the maintenance plan are checked during these routine inspections. The SWMP needs to be updated with wording that addresses this activity. We will also take a look at the Stormwater Ordinance and update it to reflect all post construction pollution prevention measures that need to be addressed.

Pollution Prevention/Good Housekeeping is currently being addressed with practices that the city has been performing such as routine training of the MS4 and Code Enforcement personnel, the purchase and citywide, routine use of a street sweeper through the Public Works Department, proper maintenance of city owned detention basins located throughout town and routine inspections throughout the city using Code & MS4 departments to control and reduce illegal dumping. The areas that need more development include: development of a specific program to control and reduce illegal dumping through public education and development of a citizens reporting program, the implementation of a used oil recycling program and finally we need to develop a SWPPP for the Streets, Water/Wastewater and the Parks Departments which detail all good housekeeping procedures and provide for the routine training of respective departmental personnel.

This concludes the review of the Six Minimum Controls and the measurable goals that were initially stated in the SWMP. Some of these goals have not been met, some are partially complete and some do not fit our specific program needs. We would like the time to adequately and completely review, edit and reconstruct the current SWMP. The goal is to get the necessary feedback from city officials, industry professionals, other city organizations, the public, and the commercial segments of Bryant through solicitation and public meetings. From these meetings we will revise the SWMP to include new deadlines and goals that will provide a more workable, applicable document that when followed, will produce an excellent, highly effective end product that protects our waters. We are requesting one year to complete the SWMP review and rewriting process which will provide updated goals and new deadlines for all elements. We feel that this time will properly allow for enough public meeting input opportunities from all segments of the population. There is one element within the SWMP that can be addressed now however, and that is the completion of the mapping of stormwater for Bryant including outfalls and overall

flow of stormwater. We have been in meetings about this issue with our GIS provider and an outside consultant and we are in the process of finalizing a plan to complete this process. Our plans are to have our stormwater maps complete by July 31, 2014.

In closing, I would like to address some of the other issues that were noted during inspections of city facilities. All of the floatables were removed at Streets and Parks departments. Another cleanup of floatables has been scheduled for the creek area this week that runs behind the Parks utility shed from the park property to Boone Road. A temporary, three sided silt fence has been properly installed to prevent runoff silt contamination from ballfield prep material to the creek and we are working on plans to add a vegetation buffer of shrubs between the creek and Parks utility shed and parking lot. The spills in dirt at Parks utility shed have been dug up and disposed of properly and new fill was added. Furthermore, Parks will seek approval to finance the building of a permanent container wall around the ballfield prep materials. Parks is still in the process of removing the pile of wood chips and that will be done within the next two weeks. On the Water/Waste Water facility properties, the used oil container has been removed from the premises and disposed of properly and the contaminated soil had been removed and disposed of properly as well. A lock has been placed on the concrete basin valve on the refueling station. Also, all of the parts/supplies located on the Water/Waste Water property were new material except for container of water meters which has been covered with tarp temporarily until meters are recycled which will happen within two months. As part of the reworking of the SWMP and setting new deadlines, we would like to include in that, the proposed completion of SWPPPs for the departments of Streets, Parks and Water/Waste Water. In these SWPPPs a routine schedule will be developed to address the issues brought up during the inspections such a routine housekeeping procedures to reduce floatables.

The last request that I have is that you change your point of contact information from Mr. Gary Hollis, Financial Director to Mr. Ben Wilson, Community Development Manager. The mailing address will remain the same. Thank you for your consideration.

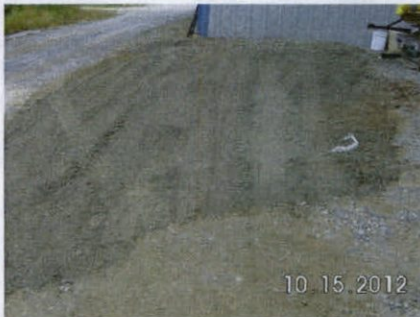
Sincerely,

A handwritten signature in cursive script, appearing to read "Jill Dabbs".

Mayor Jill Dabbs
City of Bryant, Arkansas



Used oil container system eliminated & removed. Spilled oil contaminated dirt removed disposed of properly and new material added to ground. Water Department Building.



Second picture of used oil container clean up at Water.



Of the parts and supplies stored on Water/Waste Water grounds pointed out during inspection, only one item was not new parts. That was a container of water meters which will be recycled within two months. Water Department temporarily secured item with tarp till it can be removed.



Container moved inside of covered area from side of building. Water Department.



Lock placed on refueling detention basin drain valve. Water/Waste Water.



Cleaned up spills, liquids moved to covered shed Streets.



Front of Streets garage free of runoff.



Parks area cleared of floatables. Mayor initiated plan with director to plant vegetation barrier along creek, streets and parking lot to further filter stormwater.



Parks field treatment materials encased on three sides to stop silt from leaving site. This is temporary fix till permanent bays are constructed.



Parks department removed contaminated soil under covered area and disposed of properly then replaced with new material.

AQ BIP ✓

MAYOR JILL DABBS
CITY OF BRYANT

TELEPHONE 501-943-0999
FACSIMILE 501-943-0992

AR040008
88-00831

210 S.W. 3RD STREET
BRYANT, AR 72022

December 3, 2012

Brenden Rose, E.I.
Arkansas Department of Environmental Quality
Water Division
5301 Northshore Drive
North Little Rock, AR 72118



Dear Mr. Rose:

The City of Bryant has requested until July 31, 2014 to complete the mapping of the City's stormwater system and bring it up to the level necessary to perform dry weather screening and illicit discharge detection and prevention. Since the time of your audit of the City's MS4 program this year, we have been developing a plan that would successfully bring us into mapping compliance. FTN Associates has been working with us as well as our internal GIS provider to finalize a scope of work and schedule that would get us to the mapping goal while staying within our budget and manpower constraints.

Basically, our overall plan will involve the City working with FTN to provide an initial overall system and records review, grid development & review, MS4/GIS personnel training and other preliminary work. We think that this preliminary work will be completed by the end of January. By early February, we hope to arrive at a starting point in which individual grid maps can be generated, field data gathering can begin and finally, GIS mapping can begin. We have projected by mid February 2013, we will be gathering & entering field data into our existing GIS system on a routine basis. Initially there will be a learning curve on all aspects of this process, especially with the field work. There will also be a challenge balancing existing, on-going City duties with the new mapping work. We plan to commit our two MS4 workers 2 days a week throughout the year on field work. Our GIS provider will also commit more hours during this project to process incoming field work. We estimate approximately 200 maps will be printed, field verified and entered. We have estimated that the majority of all field work will be completed in late spring of 2014 and entered into the GIS system by summer if all goes as planned. We will provide a mapping progress report to you every two months beginning at the end of February 2013.

Our goal for asking for the new deadline of July 31, 2014, is to allow us to meet budget and manpower constraints, produce a good finished, highly functioning product and still fulfill other daily commitments of City business. We hope that all of our efforts and attention giving this task since the MS4 audit has demonstrated that we have a workable plan in place and that we are committed to getting this project done correctly. It is for these reasons that we ask you to extend the MS4 mapping completion deadline to July 31, 2014. We thank you and look forward to working with you.

Sincerely,

Mayor Jill Dabbs
City of Bryant