

ADEQ

ARKANSAS
Department of Environmental Quality

September 15, 2014

Mr. Donnie Davis, Superintendent
Cossatot River School District - High School
130 School Drive
Wickes, AR 71973

RE: Cossatot River High School Inspection (Polk Co)
AFIN: 57-00428 **NPDES Permit No.: ARR153654**
State Permit No.: 5178-WR-1

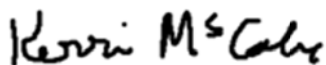
Dear Mr. Davis:

On August 26, 2014, I performed a Construction Stormwater Inspection of the above referenced facility and a Compliance Inspection of the associated wastewater treatment system 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 each of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this 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 **September 29, 2014**.


If I can be of any assistance, please contact me at mccabe@adeq.state.ar.us or (501) 682-0642.

Sincerely,



Kerri McCabe
Inspector Supervisor
Water Division

cc: Donnie Davis, Superintendent, Cossatot River School District, Ddavis@cossatot.k12.ar.us
Randall Baker, Maintenance, Cossatot River School District, RBaker@cossatot.k12.ar.us
Andy Davis, New Water Systems, adavis@newwatersystems.com

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT					
		AFIN: 57-00428		PERMIT #: ARR153654		DATE: 8/26/2014	
		COUNTY: 57 Polk			PDS #: 079699		MEDIA: WN
		GPS LAT: 34.384607 LONG: -94.385902 LOCATION: Entrance					
FACILITY INFORMATION				INSPECTION INFORMATION			
NAME: Cossatot River High School LOCATION: 6603 Hwy 71 South CITY: Vandervoort, AR				FACILITY TYPE: 2 - Industrial		INSPECTOR ID#: 84022 S - State	
				FACILITY EVALUATION RATING: 1 - Unsatisfactory		INSPECTION TYPE: Construction Stormwater	
				DATE(S): 8/26/2014		ENTRY TIME: 14:00	
RESPONSIBLE OFFICIAL				PERMIT EFFECTIVE DATE:			
				PERMIT EXPIRATION DATE:			
NAME / TITLE: Mr. Donnie Davis / Superintendent COMPANY: Cossatot River School District MAILING ADDRESS: 130 School Drive CITY, STATE, ZIP: Wickes AR 71973 PHONE & EXT. / FAX: 870-385-7101 / EMAIL: Ddavis@cossatot.k12.ar.us				FAYETTEVILLE SHALE RELATED: N			
CONTACTED DURING INSPECTION: Yes				FAYETTEVILLE SHALE VIOLATIONS: N			
				INSPECTION PARTICIPANTS			
				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Randall Baker, Maintenance			
AREA EVALUATIONS							
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)							
M	PERMIT	N	FLOW MEASUREMENT	S	STORMWATER	S	FACILITY SITE REVIEW
U	RECORDS/REPORTS	N	LABORATORY	S	SELF-MONITORING PROGRAM	N	PRETREATMENT
M	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	U	OTHER:		
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL				
**							
SUMMARY OF FINDINGS							
On August 26, 2014 and at the time of the inspection, the following violations were noted:							
1.) The SWPPP is not being kept updated. Specifically, responsible parties, stabilization practices, inspection records, etc. have not been updated. This is a violation of Part II, Section A, 3. of the permit.							
2.) Responsible Parties are not listed in the SWPPP. Only engineering maps were available in the construction mailbox. A review of the SWPPP online did not indicate the Responsible Parties. This is a violation of Part II, Section A, 4.B. of the permit.							
3.) Records of Stabilization are not being kept with the SWPPP. The site is stabilized and there are no records available. This is a violation of Part II, Section A, 4.G.2.c. of the permit.							
4.) There is no rain gauge being kept onsite to record precipitation; furthermore, there are no precipitation records being maintained as outlined in the SWPPP. This is a violation of Part II, Section A, 4.L.1.b. of the permit.							
5.) Inspections are not being conducted of the construction site nor are they being kept with the SWPPP. This is a violation of Part II, Section A, 4.L.3. of the permit.							
6.) Temporary controls such as silt fencing are not being maintained and/or removed after stabilization. This is a violation of Part II, Section A, 4.M. of the permit.							
7.) There are no records of Employee Training available with the SWPPP. This is a violation of Part II, Section							

A, 4.N. of the permit.

8.) The contact personnel for the permit has changed. This information has not been updated through the Water Division Permits Branch of the Department. This is a violation of Part II, Section B, 9.B.3. of the permit.

9.) Temporary controls such as silt fencing are not being maintained. This is a violation of Part II, Section B, 17.A. of the permit.

10.) There is no adequate staffing provided to maintain compliance with the terms of the permit. This is a violation of Part II, Section B, 17.B. of the permit.

GENERAL COMMENTS

On August 26, 2014, I inspected the site under active construction stormwater permit ARR153654; the site was determined to be in "final stabilization" as defined by Part I, Section A, 22. of the permit (temporary controls still remain onsite). I was met by Mr. Randall Baker, Maintenance, after the site had been inspected. He was under the impression that there was nothing further to be done with the construction site, and he was unaware that there were requirements associated with the permit as he had just acquired the responsibilities in June 2014.

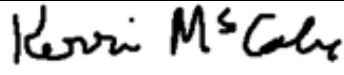

On September 4, 2014, I spoke with Mr. Donnie Davis, the current Superintendent, by phone about his options concerning the construction stormwater permit.

Option #1:

The site is stabilized. Once temporary controls are removed, a Notice of Termination (NOT; see Part I, Section B, 15. of the permit) can be submitted to terminate the active permit. All non-compliance issues noted in the "Summary of Findings" will be resolved by removing the temporary controls and submitting the NOT. A blank NOT has been provided with this letter.

Option #2:

The School District may leave the permit active. They will need to continue to pay annual permit fees and comply with the terms of the permit (per Part II, Section B, 22.). All non-compliance issues noted in the "Summary of Findings" will need to be addressed with a written response provided by the current authorized representative and with photographic evidence supplied (if applicable).

INSPECTOR'S SIGNATURE: 	Kerri McCabe	DATE: 9/15/2014
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 9/15/2014

Water Division Photographic Evidence Sheet

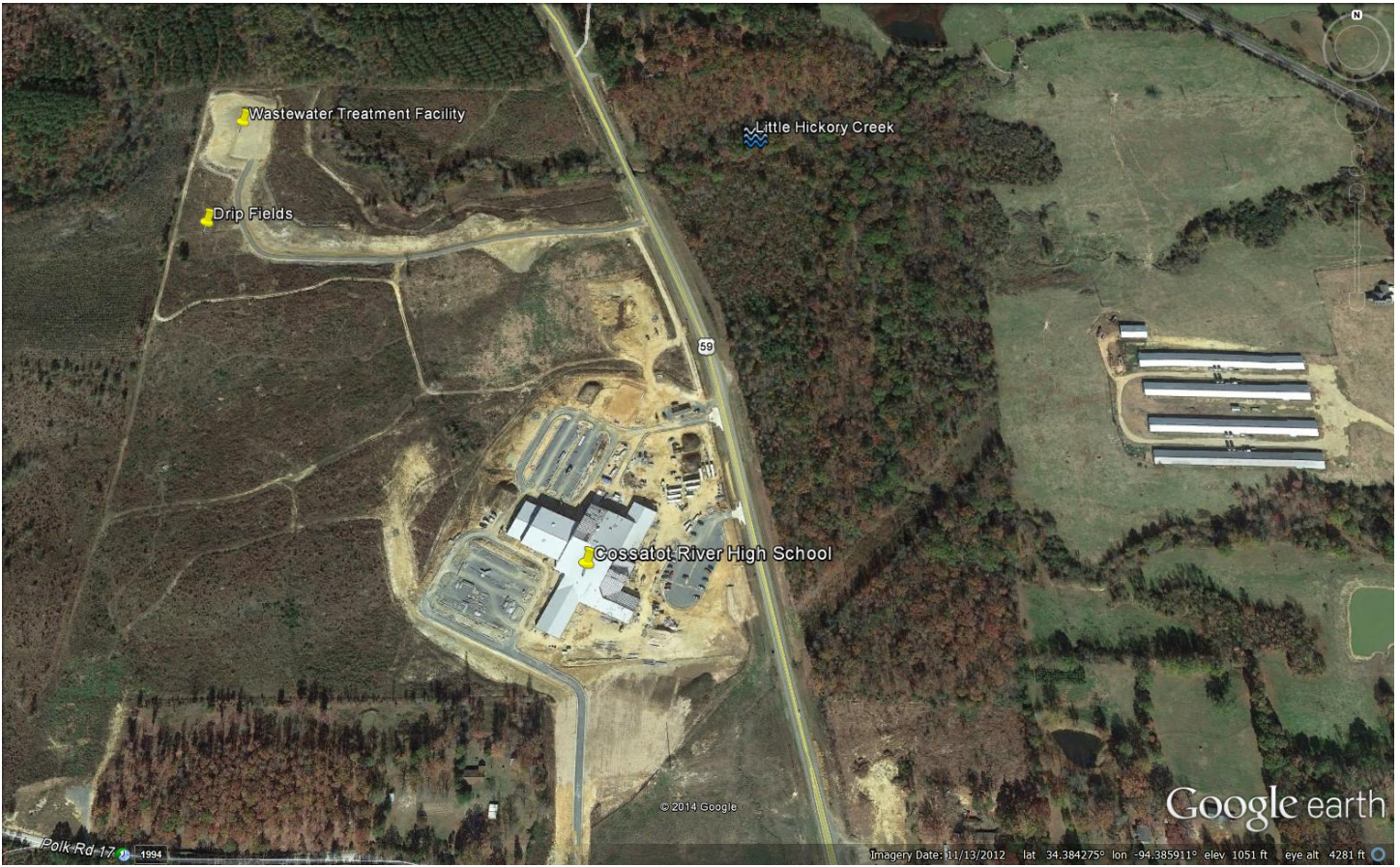
Location:	Cossatot River High School		
Photographer:	Kerri McCabe	Date:	Aug 26, 2014
Time:	1453	Witness:	n/a
Photo #:	1	Description:	Typical area noting final stabilization; note silt fencing along thicker buffer zone.



Photographer:	Kerri McCabe	Date:	Aug 26, 2014
Time:	1453	Witness:	n/a
Photo #:	2	Description:	Close up of silt fencing along buffer zone; site stabilized.



Figure 1. Google Earth image dated Nov 13, 2012 of entire construction site. This is the most recent satellite image available.



SECTION I: SITE POSTING AND SITE INFORMATION	
SITE NAME: <u>New High School</u>	TOTAL ACREAGE: <u>26</u> ACREAGE DISTURBED: <u>14</u>
LATITUDE <u>34.384607</u>	LONGITUDE <u>-94.385902</u> STARTING DATE <u>Nov 2010</u>
A. Is site is posted with Notice Of Coverage (NOC) (<i>Part II, A.2.D</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
B. Is posting at construction entrance and visible to the public (<i>Part II, A.2.D</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
C. If project is linear, is posting at area actively under construction? (<i>Part I,B.8.C</i>)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
D. If project is part of larger common plan of development, what is development name and permit number Development Name: _____ Development Permit No: _____	
SECTION II: STORM WATER POLLUTION PREVENTION PLAN EVALUATION AND IMPLEMENTATION	
A. Is the SWPPP being maintained on site from 08:00 am to 5:00 pm (<i>Part II,A.2.A</i>)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
B. Is the SWPPP properly signed as required by Part II,A.2.A of the permit?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
C. Is the SWPPP being updated as required by Part II,A.3 of the permit?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
D. Site map in SWPPP (<i>Part II,A.4.F</i>)	
1) Pre-construction topographic view (<i>Part II,A.4.F.1</i>);	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2) Direction of stormwater flow (i.e., use arrows to show which direction stormwater will flow) and approximate slopes anticipated after major grading activities (<i>Part II,A.4.F.2</i>);	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3) Delineate on the site map areas of soil disturbance and areas that will not be disturbed under the coverage of this permit (<i>Part II,A.4.F.3</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4) Location of major structural and nonstructural controls identified in the plan (<i>Part II,A.4.F.4</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5) Location of main construction entrance and exit (<i>Part II,A.4.F.5</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6) Location where stabilization practices are expected to occur (<i>Part II,A.4.F.6</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7) Locations of off-site materials, waste, borrow area, or equipment storage area (<i>Part II,A.4.F.7</i>)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8) Location of areas used for concrete wash-out (<i>Part II,A.4.F.8</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9) Location of all surface water bodies (including wetlands) (<i>Part II,A.4.F.9</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10) Locations where stormwater is discharged to a surface water and/or municipal separate storm sewer system if applicable (<i>Part II,A.4.F.10</i>)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
11) Locations where stormwater is discharged off-site (should be continuously updated) (<i>Part II,A.4.F.11</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12) Areas where final stabilization has been accomplished and no further construction phase permit requirements apply(<i>Part II,A.4.F.12</i>)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
E. Stormwater Controls	
1) Are all controls installed as described in the SWPPP (<i>Part II,A.4.G</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2) Silt fences properly installed and maintained (<i>Part II,B.17.A</i>)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3) Check dams and velocity dissipation devices properly installed and maintained (<i>Part II,B.17.A</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4) Sedimentation basins and sediment traps properly installed and maintained (sediment removed when 50% capacity) (<i>Part II,B.17.A</i>) and (<i>Part II,A.4.G.1.e</i>)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5) Has sediment that has gotten offsite been removed? (<i>Part II,A.4.G.1.d</i>)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6) Is construction site entrance sufficiently stabilized to prevent off site tracking? (<i>Part II,A.4.H.2</i>)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7) Are stabilization methods described in SWPPP being implemented in a timely manner? (<i>Part II,A.4.G.2</i>)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

F. Inspections	
1) Inspection Frequency in SWPPP – <input type="checkbox"/> Once every 7 days <input checked="" type="checkbox"/> 14 days and after ½ inch rain event	
1a) If inspection frequency is every 14 days, do they have a rain gauge on site? (Part II,A.4.L.1.b)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
1b) Is rain gauge properly installed? (nothing obstructing rain gauge) (Part II,B.17.A)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2) Are inspection records being maintained on site? (Part II,A.4.L.3)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3) Are ADEQ inspection forms being used or do the forms contain the elements required by the permit? (Part II,A.4.L.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3a) Inspector Name and Title (Part II,A.4.L.2.a)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3b) Date of Inspection (Part II,A.4.L.2.b)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3c) Amount of Rainfall and Days Since Last Rain Event (only if inspection frequency is 14 days) (Part II,A.4.L.2.c)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3d) Approximate beginning and duration of the storm event (Part II,A.4.L.2.d)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3e) Description of any discharges during inspection (Part II,A.4.L.2.e)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3f) Locations of discharges of sediment/other pollutants (Part II,A.4.L.2.f)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3g) Locations of BMPs in need of maintenance or where maintenance was performed (Part II,A.4.L.2.g)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3h) If the BMPs are in working order and if maintenance is required (when scheduled and completed) (Part II,A.4.L.2.h)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3i) Locations that are in need of additional controls (Part II,A.4.L.2.i)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3j) Location and Dates When Major Construction Activities Begin, Occur or Cease (Part II,A.4.L.2.j)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3k) Report Signature of Inspector (Part II,A.4.L.2.k)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4) Are inspections conducted in accordance with the requirements of the SWPPP? (Part II,A.4.L)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5) Are corrective actions being implemented within 3 business days? (Part II,A.4.M)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
G. Stormwater management	
1) Is solid waste being controlled as described in SWPPP? (Part II, A.4.H.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2) Are stabilized buffer zones being maintained? (25 feet from stream, 50 feet if 303 d, TMDL, ERW, ESW or NSW) (Part II, A.4.G.2.b)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3) Have velocity dissipation devices been installed at discharge points, within concentrated flow areas serving two or more acres and along drainage courses where required to prevent erosive flows (Part II, A.4.G.3.b)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4) Has silt or sediment gotten off the construction site? A.C.A. § 8-4-217(a)(2)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5) Has silt and sediment been discharged to the waters of the state? A.C.A. § 8-4-217(a)(2)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
If yes, give the name of the stream or water body: _____	
6) Is the washout of concrete being done at the designated location? (Part II,A.4.G.8)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7) Does the liquid waste from concrete washout reach the waters of the state? (Part II, A.4.H.5)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8) Are fuel storage areas protected as described by SWPPP? (Part II, A.4.H.6)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9) Have temporary erosion controls been removed from areas finally stabilized? (Part II, A.4.G)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10) Are there any allowable non-stormwater discharges that have not been addressed in the SWPPP (Part II, A.4.I)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
11) Are there any process waters or non-stormwater discharges that are not allowed under the permit being discharged? A.C.A. § 8-4-217(b)(1)(E)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
12) Does the SWPPP include the required information about employee training (dates of training, records of training, etc.) (Part II,A.4.N)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

E. Comments and Observations:

- **Site is stabilized; permit remains active**
- **SWPPP is not being updated**
- **No inspections, records of training, responsible parties, precipitation records, rain gauge, stabilization records, etc.**
- **Temporary controls (silt fence) remain onsite**

Arkansas Department of Environmental Quality
NPDES Branch, Water Division
5301 Northshore Drive
North Little Rock, AR 72118
(501) 682-0623

**NOTICE OF TERMINATION (NOT)
FOR DISCHARGERS OF STORMWATER RUNOFF ASSOCIATED WITH
CONSTRUCTION ACTIVITY
AUTHORIZED UNDER NPDES GENERAL PERMIT ARR150000**

Permit Tracking Number to be Terminated: **ARR15** _____

I. PERMITTEE INFORMATION

Permittee Legal Name: _____ Permittee Type: _____
Permittee Mailing Address: _____ STATE PARTNERSHIP
City: _____ FEDERAL CORPORATION*
State: _____ Zip: _____ SOLE PROPRIETORSHIP
Permittee Telephone Number: _____ PUBLIC OTHER
Permittee Fax Number: _____
Email _____ *State of Incorporation: _____

II. CONSTRUCTION SITE INFORMATION

Project Name: _____ Project Contact Person: _____
Project County: _____ Project Physical Address: _____
Project City: _____ Zip: _____
Telephone Number: _____

Have you established vegetation cover with 80% density? YES NO
Have all discharges associated with construction activities been eliminated? YES NO
Have you included pictures of vegetation coverage and stabilized areas? YES NO
If the project is a large plan of development, have all certifications been collected consistent with Part I.B.16.C? YES NO

****Please note that photos must be submitted in order to terminate permit coverage.****

III. PERMITTEE CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

"In addition, I understand that by submitting this Notice of Termination that I am no longer authorized to discharge storm water by general permit, and that discharging pollutants in stormwater associated with construction activity to Waters of the State is unlawful under the Clean Water Act and the Arkansas Water and Air Pollution Control Act where the discharge is not authorized by an NPDES permit."

Typed or Printed Name: _____ Title: _____
Signature: _____ Date: _____

From: [McCabe, Kerri](#)
To: [McConnell, Melissa](#)
Subject: FW: Cossatot River School District
Date: Monday, October 06, 2014 10:36:55 AM
Attachments: [Photos.pdf](#)
[image001.png](#)

Melissa,

Please attach this email and photos to WID 15004/PDS 079699. Thank you.

Kerri McCabe

Inspector Supervisor
ADEQ – Water Division
Field Services – Inspection Branch

Office – (501) 682-0642
Work Cell – (501) 352-5641
Fax – (501) 682-0880
5301 Northshore Drive
North Little Rock, AR 72118-5317



From: Cousins, Sarah
Sent: Monday, October 06, 2014 10:30 AM
To: McCabe, Kerri
Subject: RE: Cossatot River School District

Here are the pictures sent with the NOT

From: McCabe, Kerri
Sent: Monday, October 06, 2014 10:15 AM
To: Cousins, Sarah
Subject: RE: Cossatot River School District

If you have pictures, I do need those. They sent me pictures of the field lines being mowed for the State No-Discharge permit.

Kerri McCabe

Inspector Supervisor
ADEQ – Water Division
Field Services – Inspection Branch

Office – (501) 682-0642
Work Cell – (501) 352-5641
Fax – (501) 682-0880
5301 Northshore Drive
North Little Rock, AR 72118-5317



From: Cousins, Sarah
Sent: Monday, October 06, 2014 10:06 AM
To: McCabe, Kerri
Subject: Cossatot River School District

Hey Kerri,

I got an NOT and some pictures for the Cossatot River High School construction project (ARR153654, 57-00428). Gina said you had done an inspection and they were going to send you pictures that all of the silt fencing was removed. The pictures I got look ok; Do you want me to send them to you? Anything else you are waiting on that I would need to keep the permit active for?

Thanks,
Sarah Cousins
Permit Engineer
ADEQ-Water Division
501-682-0627









McCabe, Kerri

From: McCabe, Kerri
Sent: Friday, October 10, 2014 1:57 PM
To: Ddavis@cossatot.k12.ar.us
Cc: RBaker@cossatot.k12.ar.us; adavis@newwatersystems.com
Subject: Response to Inspections - Cossatot River High School (Polk Co)

Dear Mr. Donnie Davis:

I have reviewed your response pertaining to my August 26, 2014 inspection of the Cossatot River High School's wastewater system. However, the information provided does not sufficiently address the violations referenced in my inspection report.

Specifically for State No-Discharge permit **5178-WR-1**:

Item 3 – I need photographic evidence that signs have been posted at the irrigation fields.

Item 5 – I need documentation that Mr. Randall Baker is scheduled to attend a Class II Wastewater Operator course for the examination for obtaining a Class II Wastewater Operator's license. Mr. Andy Davis has provided documentation that he holds a Class III Wastewater Operator's license. Mr. Davis and/or his staff are knowledgeable and capable of providing training to Mr. Baker, and this is an option you may wish to explore.

Item 6 – I need a timeframe as to when the O&M Manual will be prepared and submitted to the ADEQ Water Division by New Water Systems.

Item 8 – see details for Item 5.

Item 9 – I need a timeframe as to when the lab information and analyses will be available from New Water Systems.

This information and work should be complete as soon as possible. Please provide the timeline no later than **Oct 24, 2014**.

Specifically for NPDES permit **ARR153654**:

You have submitted the NOT to the Department; however, the temporary controls (silt fencing) have not been removed. The response for this inspection has been extended until **Nov 4, 2014**.

Thank you for your attention to these matters. Please feel free to contact me with any questions; and if you require any assistance, I would be more than happy to assist you.

Kerri McCabe

Inspector Supervisor
ADEQ – Water Division
Field Services – Inspection Branch

Office – (501) 682-0642
Work Cell – (501) 352-5641
Fax – (501) 682-0880
5301 Northshore Drive

North Little Rock, AR 72118-5317



McCabe, Kerri

From: Donnie Davis <DDavis@cossatot.k12.ar.us>
Sent: Friday, October 17, 2014 8:14 AM
To: McCabe, Kerri
Subject: RE: SWPPP - silt fence removal

Yes, their subcontractor Harris came yesterday with a crew and accomplished a great deal of fence removal...not sure if they finished, but got a major portion.

From: McCabe, Kerri [<mailto:MCCABE@adeq.state.ar.us>]
Sent: Friday, October 17, 2014 7:41 AM
To: Donnie Davis
Subject: RE: SWPPP - silt fence removal

Mr. Davis,

I was on Hwy 71 S yesterday to DeQueen and noticed Nabholz at the Cossatot River High School. Thank you for your attention to this matter.

Kerri McCabe

Inspector Supervisor
ADEQ – Water Division
Field Services – Inspection Branch

Office – (501) 682-0642
Work Cell – (501) 352-5641
Fax – (501) 682-0880
5301 Northshore Drive
North Little Rock, AR 72118-5317



From: Donnie Davis [<mailto:DDavis@cossatot.k12.ar.us>]
Sent: Tuesday, October 14, 2014 12:15 PM
To: Mickey Ford; LaDonna White; McCabe, Kerri
Subject: FW: SWPPP - silt fence removal

FYI...

From: David Williams [<mailto:David.Williams@nabholz.com>]
Sent: Tuesday, October 14, 2014 9:08 AM
To: Donnie Davis
Subject: SWPPP - silt fence removal

Mr. Davis, I had called and left you a voicemail concerning the silt fence removal; I spoke with Jamie Brown (with Harris Company of Fort Smith) and due to the weather he was not able to get out there yesterday. He is anticipating getting out there tomorrow, Wednesday, morning to begin removal. I will check with him to verify, and if you could, please let us know if you see his crew there if you happen to be at the school... If you need anything, please don't hesitate to contact me... Thank you



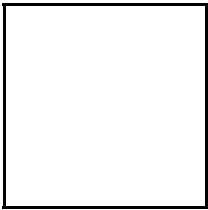
David Williams

Nabholz Construction Services

Project Manager

(W): +1 (501) 505-5871 | (M): +1 (501) 472-5461

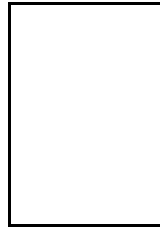
E-mail: david.williams@nabholz.com



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McCabe, Kerri

From: Donnie Davis <DDavis@cossatot.k12.ar.us>
Sent: Monday, October 20, 2014 1:23 PM
To: McCabe, Kerri
Subject: FW:
Attachments: Drip Field 1.jpeg; Drip Field 2.jpeg; Silt Fence 2.jpeg; Silt Fence 4.jpeg; Silt fence 3.jpeg; Treatment Plant.jpeg; Silt Fence 1.jpeg

These photos are evidences that (1) the signs are placed at the irrigation field (2) the silt fences are all removed. Let me know what next steps to take. Nabholz and New Water Systems are still working on getting us O&M manuals. I have notified the architect on the new high school project of the missing manuals as well.

From: Randall Baker
Sent: Monday, October 20, 2014 1:18 PM
To: Donnie Davis
Subject:









ADEQ

ARKANSAS
Department of Environmental Quality

November 13, 2014

Mr. Donnie Davis, Superintendent
Cossatot River School District - High School
130 School Drive
Wickes, AR 71973

Re: Response to Inspections (Polk Co)
AFIN: 57-00428 **NPDES Permit No.: ARR153654**
State Permit No.: 5178-WR-1

Dear Mr. Davis:

I have reviewed the response pertaining to the August 26, 2014 inspections of the above-referenced facility. The information provided sufficiently addresses the violations referenced in the inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (501) 682-0642 or you may e-mail me at mccabe@adeq.state.ar.us.

Sincerely,



Kerri McCabe
Inspector Supervisor
Water Division