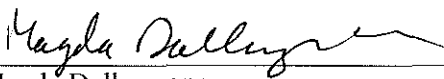
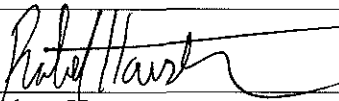


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	November 27 – 28, 2017		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	City of Hot Springs		
Facility Name:	City of Hot Springs Wastewater Treatment Plant		
Facility Physical Location:	798 Adams St		
(city, state, zip code)	Hot Springs, AR 71901		
Mailing address:	798 Adams St		
(city, state, zip code)	Hot Springs, AR 71901		
County/Parish:	Garland		
Facility Contact:	Harold Mauldin	Lab Manager	
	HMAuldin@cityhs.net		
FRS Number:	110000517254		
Identification/Permit Number:	AR0033880		
Media Number:	None		
NAICS:	221320		
SIC:	4952		
Personnel participating in inspection:			
Magda Dallemagne	US EPA, 6EN-WS	Inspector	(214) 665-7396
Harold Mauldin	Facility Representative	Lab Manager	(501) 262-1881
Gordon Yates	Facility Representative	Plant Supervisor	(501) 262-1881
Amanda Cates	Facility Representative	Lab Technician	(501) 262-1125
EPA Lead Inspector Signature/Date	 Magda Dallemagne		1-26-2018 Date
Supervisor Signature/Date	 Robert Houston		1/26/2018 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Magda Dallemagne arrived at the City of Hot Springs Wastewater Treatment Plant (WWTP) (the Facility) at 9:10 am on November 27, 2017, for an unannounced inspection. I met with Gordon Yates, Plant Supervisor, and Amanda Cates, Lab Technician. I presented my credentials to Mr. Yates informing him that this was an EPA inspection to determine compliance with the facility's National Pollution Discharge Elimination System (NPDES) permit, AR0033880. The scope of the inspection is to evaluate the compliance of the facility's laboratory and sampling with its NPDES operating permit.

FACILITY DESCRIPTION

The Facility laboratory is not accredited under State, National, or Private programs. There is one Lab Manager and two Lab Technicians. The laboratory performs pH, dissolved oxygen (DO), 5 Day Carbonaceous Biochemical Oxygen Demand (CBOD₅), Total Suspended Solids (TSS), Ammonia, and Fecal Coliform (Fecal) testing under their NPDES operating permit. The remaining required testing is sampled on site and sent to a contract laboratory, NSI Laboratory Solutions, to satisfy the permit requirements.

Section II - OBSERVATIONS

The inspector discussed the operations and management of the laboratory and observed as the technician walked them through the processes for testing and sampling as per the NPDES permit.

The following issues were discovered.

1. The expiration and open dates on the reagents and standards were not clearly labeled, and did not meet the general one year after opening, or as per manufacturer's expiration, rule. The received dates were recorded clearly.
2. Internal training is not formally tracked, and no regular performance reviews are conducted on the technicians.
3. Some thermometers were not held suspended in containers such that the thermometers were touching the inside surface of its container. Temperature readings can be affected if the thermometer is touching surfaces such as glass or metal, and so must be suspended.
4. The technicians were recording the time for grab samples after returning to the lab, subtracting 3-5 minutes from the current time they read. The data collected for grab samples, including time of grab, must be collected at the time and place of the sampling. The data was also recorded in a loose notebook, considered an un-controlled document, and was recorded using pencil instead of pen.
5. The weights used for balance calibration are not National Institute of Standards and Technology (NIST) certified and the balance is unplugged regularly due to power surges

in the laboratory. This could affect the balance's yearly NIST certified calibration, it was suggested the Facility consult the manufacturer for proper precautions.

6. The adjustable pipets used in the lab do not undergo regular calibrations or checks to ensure an accurate dispensing of volume.
7. The NIST certified thermometers had not been calibrated since 2004, most calibration certifications last one year, a maximum of 5 years. The thermometers therefore are no longer NIST certified, and the working thermometers checked by the certified thermometers are no longer NIST traceable.
8. Standard Operating Procedures (SOP) are not regularly updated and do not reference the appropriate EPA or Standard Method.
9. Bench sheets did not clearly label units for all data entries and did not reference the appropriate EPA method.

Section III – AREAS OF CONCERN

At the conclusion of the inspection, the EPA inspector met with the representatives from the Facility for an exit interview at 2:50 pm November 28, 2017. At that time, the inspector provided details of the inspection and reviewed issues noted in the inspection that will require additional follow-up or correction. These issues included:

1. Handling of reagents and standards
2. Tracking of training
3. Maintenance of equipment and instruments
4. Maintenance of SOPs and bench sheets

Section IV – FOLLOW UP

As per the document request placed during the inspection, documents were last received by EPA on December 1, 2017, after exiting the Facility on November 28, 2017. A copy of this report will be sent to the facility.