



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

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   0   0   3   4   3   8   0   11   12   0   6   0   3   0   7   17   18   S   19   S   20   1					
Remarks					
A   F   I   N   0   1   -   0   0   0   4   1					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67   0   0   2   69	70   3	71   N	72   N	73	74   75

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>City of Stuttgart WWTP 10<sup>th</sup> Street Extension West Section 29, Township 3 South, Range 2 West Arkansas County, Arkansas</b>	Entry Time /Date <b>~ 8:30 a.m. 3/7/06</b>	Permit Effective Date <b>February 1, 2004</b>
	Exit Time/Date <b>~ 3:30 p.m. 3/7/06</b>	Permit Expiration Date <b>January 31, 2009</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Tommy Lawson, Head Wastewater Operator 870-673-1043 Danny Wilson, Assistant Wastewater Operator 870-673-1043 Marvin Kreimeier, Water Utilities Manager 870-673-3246</b>	Other Facility Data <b>Trimble GPS Location recorded.</b>	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Marvin Kreimeier, Water Utilities Manager City of Stuttgart P.O. Box 130 Stuttgart, Arkansas 72160</b>	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)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	S	Sampling
U	Records/Reports	U	Self-Monitoring Program	S	Sludge Handling/Disposal	S	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	S	Pretreatment	S	Multimedia
M	Effluent/Receiving Waters	S	Laboratory	S	Storm Water	S	Other: Effluent Limits

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

The inspection conducted revealed the following inadequacies:

- No documentation that the 30-day average percent removal rate for Biochemical Oxygen Demand and Total Suspended Solids are at least eighty-five percent (85%).
- No documentation of the analysis time, on the Chain of Custody, for DO, pH, and Total Residual Chlorine.
- The contracted laboratory is not listing, on analytical data reports, which Edition of Standard Methods that are referenced for analytical methodology.
- The effluent consisted of a distinct visible foam, moderately distributed into the receiving stream.

Sample analysis revealed that the City of Stuttgart WWTP was within the permitted parameters of the current permit. Due to laboratory malfunction, the CBOD analysis was voided.

Name(s) and Signature(s) of Inspector(s) <b>Steven L. Henderson</b>	Agency/Office/Telephone/Fax <b>ADEQ/ Stuttgart/ (870) 673-8846/ (870) 673-7236</b>	Date <b>March 13, 2006</b>
ddw		
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**SECTION A - PERMIT VERIFICATION**

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS:  S  M  U  NA (FURTHER EXPLANATION ATTACHED No)

- 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE  Y  N  NA
- 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES  Y  N  NA
- 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT  Y  N  NA
- 4. ALL DISCHARGES ARE PERMITTED  Y  N  NA

**SECTION B - RECORDKEEPING AND REPORTING EVALUATION**

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. DETAILS:  S  M  U  NA (FURTHER EXPLANATION ATTACHED No)

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.  Y  N  NA
- 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.  S  M  U  NA
  - a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING *analysis time of pH, DO, and TRC not listed*  Y  N  NA
  - b) NAME OF INDIVIDUAL PERFORMING SAMPLING  Y  N  NA
  - c) ANALYTICAL METHODS AND TECHNIQUES. *Not listing which Edition of Standard Methods used for analysis methodology*  Y  N  NA
  - d) RESULTS OF ANALYSES AND CALIBRATIONS.  Y  N  NA
  - e) DATES AND TIMES OF ANALYSES.  Y  N  NA
  - f) NAME OF PERSON(S) PERFORMING ANALYSES.  Y  N  NA
- 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. **Contract Laboratory**  S  M  U  NA
- 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.  S  M  U  NE
- 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.  Y  N  NA

**SECTION C - OPERATIONS AND MAINTENANCE**

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS:  S  M  U  NA (FURTHER EXPLANATION ATTACHED No)

- 1. TREATMENT UNITS PROPERLY OPERATED.  S  M  U  NA
- 2. TREATMENT UNITS PROPERLY MAINTAINED.  S  M  U  NA
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.  S  M  U  NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.  S  M  U  NA
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE.  S  M  U  NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. *2 Class IV, 1 Class II, 1 Class I*  S  M  U  NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.  S  M  U  NE
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.  Y  N  NA
- STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.  Y  N  NA
- PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.  Y  N  NE

**SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)**

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?  Y  N  NA  
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?  Y  N  NA  
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?  Y  N  NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?  Y  N  NA  
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?  Y  N  NA

**SECTION D - SAMPLING**

PERMITTEE Sampling MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No ).  
 DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.  Y  N  NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.  Y  N  NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.  Y  N  NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.  Y  N  NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.  Y  N  NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE  Y  N  NA
- a) SAMPLES REFRIGERATED DURING COMPOSITING.  Y  N  NA
- b) PROPER PRESERVATION TECHNIQUES USED.  Y  N  NA
- c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136  Y  N  NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?  Y  N  NA

**SECTION E - FLOW MEASUREMENT**

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No )  
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  Y  N  NA  
 TYPE OF DEVICE 8' Rectangular Weir w/end contractions
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.  Y  N  NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.  Y  N  NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION ( 6/20/05 )  
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  Y  N  NA  
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.  Y  N  NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.  Y  N  NA
6. HEAD MEASURED AT PROPER LOCATION.  Y  N  NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.  Y  N  NA

**SECTION F - LABORATORY**

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No )  
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)  Y  N  NA

**SECTION F - LABORATORY (CONT'D)**

- 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED  Y  N  NA
- 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  S  M  U  NA
- 4. QUALITY CONTROL PROCEDURES ADEQUATE.  S  M  U  NA
- 5. DUPLICATE SAMPLES ARE ANALYZED. \_\_\_ % OF THE TIME  Y  N  NA
- 6. SPIKED SAMPLES ARE ANALYZED. \_\_\_ % OF THE TIME.  Y  N  NA
- 7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME McClelland Consulting Laboratories  
 LAB ADDRESS 900 West Markham Street, Little Rock, Arkansas 72201  
 PARAMETERS PERFORMED CBOD5, TSS, NH3-N, DO, FCB, TRC, pH, Chronic Biomonitoring

**SECTION G - (EFFLUENT)/RECEIVING WATERS OBSERVATIONS.**  S  M  U  NA (FURTHER EXPLANATION ATTACHED \_\_\_).

Based on visual observations only.

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	<i>None</i>	<i>None</i>	<i>None</i>	<i>Moderate</i>	<i>None</i>	<i>Lt. Green</i>	

Comments:

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED No).  
 DETAILS:

- 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.  S  M  U  NA
- 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.  S  M  U  NA
- 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: \_\_\_ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

**SECTION I - SAMPLING INSPECTION PROCEDURES** (FURTHER EXPLANATION ATTACHED No)

- 1. SAMPLES OBTAINED THIS INSPECTION.  Y  N  NA
- 2. TYPE OF SAMPLE OBTAINED - **N/A**  

GRAB	<input checked="" type="checkbox"/>	COMPOSITE	<input type="checkbox"/>	SAMPLE	<input checked="" type="checkbox"/>	METHOD	<u>24-Hour Composite</u>	FREQUENCY
------	-------------------------------------	-----------	--------------------------	--------	-------------------------------------	--------	--------------------------	-----------
- 3. SAMPLES PRESERVED.  Y  N  NA
- 4. FLOW PROPORTIONED SAMPLES OBTAINED.  Y  N  NA
- 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.  Y  N  NA
- 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE.  Y  N  NA
- 7. SAMPLE SPLIT WITH PERMITTEE.  Y  N  NA
- 8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.  Y  N  NA
- 9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.  Y  N  NA

**FLOW CALCULATION SHEET**

Field Data: Date: March 7, 2006 Time: 2:30 p.m.

Head in Inches 2.9 = .240

Type & Size of Primary Flow Measurement Device

8' Rectangular Weir w/end contractions

Name & Model of Secondary Flow Measurement Device

Greyline SLT 32

Recorded Flow at date & time listed above: 1.366 mgd

Flows are calculated from flow charts taken from the ISCO Open Channel Flow Measurement Handbook-5th Edition

$$\% \text{ error} = \frac{(\text{recorded value} - \text{calculated value})}{\text{calculated value}} \times 100$$

$$\% \text{ error} = \frac{1.366 - 1.42}{1.42} \times 100$$

$$\% \text{ error} = -3.80$$

DMR Calculation Check

Reporting Period: From 05 12 01 To 05 12 31  
Year Month Day Year Month Day

Parameter Checked: TSS

	Loading	Concentration	
	Mass	Monthly	7-day Avg. -mg/l
	Mo. Avg. -lbs/ day	Mo. Avg.-mg/l	
Reported Value:	25.9	2.6	4.0
Calculated Value:	25.9	2.6	4.0
Permit Value:	438	15	23

If calculated value does not equal reported value, explain: *EQUAL*

**NPDES Compliance Inspection Report  
Further Explanation**

**Page \_\_\_\_\_ of \_\_\_\_\_**

**Section \_\_\_\_\_**

**Detail \_\_\_\_\_**

**Page \_\_\_\_\_ of \_\_\_\_\_**

**Section \_\_\_\_\_**

**Detail \_\_\_\_\_**

**Page \_\_\_\_\_ of \_\_\_\_\_**

**Section \_\_\_\_\_**

**Detail \_\_\_\_\_**

**Page \_\_\_\_\_ of \_\_\_\_\_**

**Section \_\_\_\_\_**

**Detail \_\_\_\_\_**

# ADEQ

ARKANSAS  
Department of Environmental Quality

March 22, 2006

Marvin Kreimeier, Manager  
Stuttgart Municipal Waterworks  
P.O. Box 130  
Stuttgart, Arkansas 72160

RE: AFIN: 01-00041      NPDES Permit No.: AR0034380

Dear Mr. Kreimeier:

On March 7, 2006, I conducted a compliance sampling inspection of the waste water treatment 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. This inspection revealed the following violations:

1. **No documentation that the 30-day average percent removal rate for Biochemical Oxygen Demand and Total Suspended Solids are at least eighty-five percent (85%).**
2. **No documentation of the analysis time, on the Chain of Custody, for DO, pH, and Total Residual Chlorine.**
3. **The contracted laboratory is not listing, on analytical data reports, which Edition of Standard Methods that are referenced for analytical methodology.**
4. **The effluent consisted of a distinct visible foam, moderately distributed into the receiving stream.**

The above items require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department when the violations have been corrected. This response should contain documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by **April 20, 2006**.

If I can be any assistance, please contact me at (870) 673-8846.

Sincerely,

Steven L. Henderson  
District 6 Inspector  
Water Division

cc: NPDES Branch



## 503 SLUDGE INSPECTION CHECKLIST - LAND APPLICATION

**FACILITY:** City of Stuttgart

**PERMIT #:** AR0034380

**INSPECTION DATE:** March 7, 2006

1. What is the quantity of sludge land applied per year (dry weight basis)  
238.4 Metric Tons per year
2. What is the required frequency of monitoring for pollutants, pathogen densities, and vector attraction reduction? (See table 2-7, p. 43)  
once per quarter (4 times per year)
3. Is monitoring being conducted at the required frequency? Yes, 4/year
4. Which set of metals limits is being met? (pollutant concentration limits or ceiling concentration limits - See Table 2-1, p. 29) Table 3
5. Which Pathogen Reduction Requirement alternative is being used? (See Table 2-5., p. 37) Alternative 1: Thermally Treated Biosolids  
Are the requirements for the alternative being met? Yes
6. Which Vector Attraction Reduction option is being used? (See Table 2-6, p. 37)  
Options 1 and 8  
Are the requirements for the selected option being met? Yes

### **GO TO FLOW CHART, DETERMINE SLUDGE TYPE, RESULTING REQUIREMENTS**

7. What is the sludge type? (EQ, PC, CPLR, or APLR)  
EQ
8. Are site restrictions required?  
NO  
Are they being met? (See Fig. 2-4, p. 38)  
NA
9. Are management practices required?  
No  
Are they being met? (See Fig. 2-9, p. 45)  
NA
10. Do the general requirements apply? No  
Are they being met? (See Fig. 2-8, p. 44)  
NA
11. Is the facility subject to loading rate limits?  
Yes  
Are they being met? (See Table 2-1, p. 29) Yes

**NOTE: TABLES AND PAGE NUMBERS REFERENCED ABOVE ARE FROM EPA'S A PLAIN ENGLISH GUIDE TO THE EPA PART 503 BIOSOLIDS RULE, September 1994.**