

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS: **New outfall location addressed in permit AR0021768C signed July 31, 2006.**

- 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. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

- 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 Y N NE
 - b) NAME OF INDIVIDUAL PERFORMING SAMPLING Y N NE
 - c) ANALYTICAL METHODS AND TECHNIQUES. 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. 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. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

- 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 NE
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE. S M U NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. S M U NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. S M U NE
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. Y N NE
- STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. Y N NE
- 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 NE
 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: **Zinc and copper were sampled 3 times in January, 2007. Permit only requires once/month.**

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. **For reviewed parameters** 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 Yes - Attach. 1)
 DETAILS: **Effluent totalizer not within ± 10% of true discharge rate. See Attachment 1.**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE 5 foot rectangular weir with 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 (4-10-2007)
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. Y N NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. Y N NE

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 Yes - Attach. 3)
 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, 100 % OF THE TIME Y N NA
- 6. SPIKED SAMPLES ARE ANALYZED, 100 % OF THE TIME. Y N NA
- 7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME Environmental Enterprise Group
 LAB ADDRESS 220 North Knoxville, Russellville, AR 72801
 PARAMETERS PERFORMED Bio-monitoring and metals

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	None	None	Slight	Slight	None	Light green	

Comments: **Receiving stream appeared normal. No sludge deposits noted.**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No).
 DETAILS: **See 503 inspection sheet**

- 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: Agricultural

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	COMPOSITE	SAMPLE	METHOD	FREQUENCY
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- 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 5-21-2007 Time 1140

Head in Inches 6.5 = 0.54 ft

Type & Size of Primary Flow Measurement Device

5 foot rectangular weir with end contractions

Name & Model of Secondary Flow Measurement Device

Eastech Badger Vantage 2210

Recorded Flow at date & time listed above 4.83 mgd

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

$$\% \text{ error} = \frac{4.83 - 4.178}{4.178} \times 100$$

$$\% \text{ error} = 0.15 \times 100$$

$$\% \text{ error} = 15\%$$

DMR Calculation Check

Reporting Period: From 07 01 01 To 07 01 31
 Year Month Day Year Month Day

Parameter Checked: Zinc (total recoverable)

	Loading Mass Mo. Avg. -lbs/ day	Concentration Monthly Mo. Avg.-µg/l	Daily max.
Reported Value:	37 mg/l	704.1 µg/l	1800 µg/l
Calculated Value:	36.8 mg/l	704.1 µg/l	1800 µg/l
Permit Value:	5.2 mg/l	86 µg/l	172 µg/l

If calculated value does not equal reported value, explain:

**NPDES Compliance Inspection Report
Further Explanation**

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Section F

- 1. Lab is not pre-distilling NH₃ samples prior to analysis as required by 40 CFR 136.**
- 2. Lab not running GGAC on all BOD samples as required by Standard Methods 5210 B, 20th Edition.**
- 3. Reviewed bench sheets revealed that blanks waters for BOD are under or over depleted.**
- 4. Reviewed bench sheets showed that BOD samples are dechlorinated but there was no verification that the dechlorination was complete.**
- 5. Lab is referencing EPA method 160.2 for the analysis of TSS. This method was rescinded on April 11, 2007 and is no longer an approved method according to 40 CFR 136 dated March 22, 2007.**

ADEQ

ARKANSAS
Department of Environmental Quality

June 4, 2007

Mr. Craig Noble, General Manager
Russellville City Corporation
P.O. Box 3186
Russellville, AR 72811-3186

RE: AFIN: 58-00105

NPDES Permit No.: AR0021768

Dear Mr. Noble:

On May 21, 2007, EPA inspector David Long and I performed a routine compliance 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. The totalizing meter at Outfall 001 was not reading within $\pm 10\%$ of the true discharge rate. This is a violation of Part II.C.2 of the permit.**
- 2. The facility's lab is not pre-distilling NH₃ samples prior to analysis as required by 40 CFR 136.**
- 3. Glucose-glutamic acid checks (GGAC) are not being conducted on all BOD samples as required by Standard Methods 5210 B, 20th Edition.**
- 4. Reviewed bench sheets showed that blank waters for BOD are under or over depleted.**
- 5. Reviewed bench sheets showed that BOD samples are dechlorinated but there was no verification that the dechlorination was complete.**
- 6. The lab is referencing EPA method 160.2 for the analysis of TSS. This method was rescinded on April 11, 2007 and is no longer an approved method according to 40 CFR 136 dated March 22, 2007.**

The above items require your immediate attention. Please submit a written response to these findings to the Enforcement Section of the Water Division. This response should contain documentation describing the course of action taken to correct the items noted.

WATER DIVISION

AR0021768 (Russellville WWTP)

June 4, 2007

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This corrective action should be completed as soon as possible, and the written response is due by June 29, 2007.

If I can be any assistance, please contact me at 479-968-7339.

Sincerely,

A handwritten signature in black ink that reads "Greg Kremers". The signature is written in a cursive, slightly slanted style.

Greg Kremers
District 5 Field Inspector
Water Division

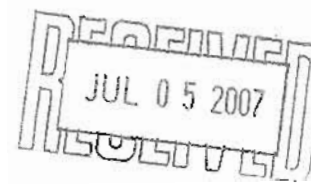
cc: Enforcement Branch
Permits Branch



-SL to Frank

CITY CORPORATION
Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186



Phone (479) 968-2105
FAX (479) 968-3265

June 28, 2007

Dennis Benson
Arkansas Department of Environmental Quality
NPDES Enforcement Section
Post Office Box 8913
8001 National Drive
Little Rock Arkansas 72219-8913

RE: AFIN: 58-00105

NPDES Permit No: AR0021768

Dear Mr. Benson:

On May 21, 2007, Mr. Greg Kremers, ADEQ District 5 Field Inspector and Mr. David Long, EPA Region 6 inspector, inspected City Corporation's wastewater treatment facilities. Below are City Corporation's response to the violations as noted in Mr. Kramer's letter dated June 4, 2007.

1. Violation: The totalizing meter at Outfall 001 was not reading within $\pm 10\%$ of the true discharge rate. This is a violation of Part II.C.2 of the permit.

Response: To ensure level of effluent over weir, City Corporation plant staff will install a permanent reference point on the side plate of the effluent box. This work will be accomplished by July 10, 2007. A yearly calibration of our flow meter has been scheduled and will be accomplished in July 2007.

2. Violation: The facility's lab is not pre-distilling NH₃ samples prior to analysis as required by 40 CFR 136.

Response: City Corporation's lab personnel have updated their SOP and are now pre-distilling NH₃ samples as required by 40 CFR 136.

3. Violation: Glucose-glutamic acid checks (GGAC) are not being conducted on all BOD samples as required by Standard Methods 5210 B, 20th Edition.

Response: City Corporation requests a clarification to this violation. A review of Standard Methods 5210 B, 20th Edition states in part 4c. *Glucose-glutamic acid check*, "Periodically check dilution water quality, seed effectiveness, and analytical technique by making measurements on a mixture of 150 mg glucose/L and 150 mg glutamic acid/L as a "standard" check solution". City Corporation has historically performed a GGAC test once a week as a check for our CBOD samples. It is our intention to perform all analysis according to the approved methods, and if necessary we will implement a GGAC on all CBOD samples if this is in fact a requirement.

4. Violation: Reviewed bench sheets showed that blank waters for BOD are under or over depleted.

Response: City Corporation's lab analyst, Charlotte Petrick, visited with Fort Smith Wastewater lab on June 27, 2007. The purpose of this visit was to review their CBOD and QA/QC procedures and ensure correct processes are in place at City Corporation's facility. Charlotte gained knowledge in the areas of DO meter calibration and glassware cleaning that City Corporation will implement. Projected date for correction is August 1, 2007.

5. Violation: Reviewed bench sheets showed that BOD samples are dechlorinated but there was no verification that the dechlorination was complete.

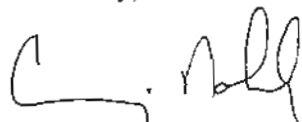
Response: CBOD bench sheet have been modified showing that dechlorination is complete. Lab personnel were performing this step, just failing to properly document on bench sheet.

6. The lab is referencing EPA method 160.2 for the analysis of TSS. This method was rescinded on April 11, 2007 and is no longer an approved method according to 40 CFR 136 dated March 22, 2007.

Response: City Corporation lab is now using Standard Method 2540-D, 18th Edition as the reference method. Lab SOP and bench sheets have been revised to reflect the stated method.

Should you have any questions please contact Larry Collins, Operations Manager at (479) 968-2080 Ext 132.

Sincerely,



Craig Noble
General Manager

From: Roberts, Anne
Sent: Thursday, August 06, 2009 11:37 AM
To: Craig Noble (cnoble@citycorporation.com)
Subject: FW: comments appreciated
Craig,

See below. I was just tying up some loose ends when I couldn't find a reply to your request for clarification in your response to ADEQ's May 2007 inspection (attached). We agree the violation was noted in error.

Let me know if you have any questions.

Anne Roberts
Enforcement Analyst
Enforcement Branch
Water Division
Arkansas Department of Environmental Quality
5401 Northshore Drive
North Little Rock, AR 72218-5317
Ph. 501-682-0632
Fax 501-682-0910
robertsa@adeq.state.ar.us

-----Original Message-----

From: Fleming, Eric
Sent: Thursday, August 06, 2009 10:18 AM
To: Roberts, Anne; Garner, Cindy
Subject: comments appreciated

see below. We can't really "Enforce" this (daily stds), but when we see a problem with QC we will write them up on that end.

Eric

From: Ibarra.Juan@epamail.epa.gov [mailto:Ibarra.Juan@epamail.epa.gov]
Sent: Wednesday, August 05, 2009 12:41 PM
To: Fleming, Eric
Cc: Long.David@epamail.epa.gov
Subject: Re: comments appreciated

Eric,
Yep, 18th edition of SM (only copy we have) does say to run the GGA "periodically".....and although my preference based on EPA Guidance from 1979 (again that's guidance) recommends that blanks, dups, stds and spikes be run one per batch or one per ten, if we do not suspect a problem, we can let them go about once a week on GGA due to the method's wording. If they do have problems then we start looking to tighten up their QC on the GGA. We still recommend daily, however, at the rate specified above.

Juan

comments appreciated



Fleming, Eric

to: David Long, Juan Ibarra

08/05/2009 10:44 AM

Hello Guys,

Please see the comments below and tell me what you think. Your thoughts and comments are always appreciated.

Eric

From: Fleming, Eric
Sent: Wednesday, August 05, 2009 10:37 AM
To: Hurley, Jane
Cc: Sawyer, Sam; Garner, Cindy; Roberts, Anne; Washam, Dale
Subject: RE: Picking your brain

A good QA/QC program would require that GGAC stds be run once/batch. So if Jane says that once per week (even if they sample daily) meets the requirement for periodically we will no longer write up that violation if we can't stand behind it. I will ask a few folks about it before we will implement this change.

Eric

From: Roberts, Anne
Sent: Wednesday, August 05, 2009 10:22 AM
To: Fleming, Eric
Cc: Sawyer, Sam; Garner, Cindy
Subject: FW: Picking your brain

FYI.

Anne Roberts
Enforcement Analyst
Enforcement Branch
Water Division
Arkansas Department of Environmental Quality
5401 Northshore Drive
North Little Rock, AR 72218-5317
Ph. 501-682-0632
Fax 501-682-0910
robertsa@adeq.state.ar.us

-----Original Message-----

From: Hurley, Jane
Sent: Wednesday, August 05, 2009 9:47 AM
To: Roberts, Anne
Subject: RE: Picking your brain

City Corp is right, "periodically" could mean just about anything. The reason most labs do it with every batch is that if something goes wrong, how far back do you want to cast suspicion on your data... to the last GGA? If it was a month ago, are you going to void all the data since then? So it's a judgment call by the lab.

I wouldn't say that doing it once a week is a violation.

Jane

-----Original Message-----

From: Roberts, Anne

Sent: Wednesday, August 05, 2009 9:22 AM

To: Hurley, Jane

Subject: Picking your brain

Miss Jane,

In one of Water Division's inspections, the following violation was noted:

Glucose-glutamic acid checks (GGAC) are not being conducted on all BOD samples as required by Standard Methods 5210 B, 20th Edition.

The permittee says it doesn't think this is really required.

Could you give me your learned opinion on the matter? The permittee's letter explaining its position is the last page in the inspection report. I couldn't cut and paste that language, so here is a hyperlink to the file: [G:\Shared Folders\Inspections\033448-insp.pdf](G:\Shared\Folders\Inspections\033448-insp.pdf).

Many thanks.

Anne Roberts
Enforcement Analyst
Enforcement Branch
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