

December 28, 2007

Ken Johnson, Manager Pine Bluff Wastewater Utility 1520 South Ohio Street Pine Bluff, Arkansas 71601-6055

RE: Wastewater Treatment System

AFIN: 35-00149 NPDES Permit No.: AR0033316

Dear Mr. Johnson:

On December 3, 2007, I conducted 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 violation:

Inadequate certification and calibration of laboratory thermometers. The last certification documentation available was dated April 25, 2006.

The above item requires your immediate attention. Please submit a written response to the Water Division Enforcement Section of this Department at the following address:

Water Division Enforcement Section Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

This response should contain detailed documentation describing the course of action taken to correct the item noted. This corrective action should be completed as soon as possible, and the written response is due by **January 18, 2008**.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

Ken Johnson, Manager Pine Bluff Wastewater Utility December 28, 2007 Page 2

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

Sincerely,

Steven L. Henderson District 6 Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

Teven L. Honderson

	ADEQ Water NPDES Inspection					AF	FIN: <b>35-00149</b> Permit #: <b>AR0</b>				0333	33316															
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Į	Inspe	ection Work	Days			Fac	ility E	valuat	tion Ra	ating		]	BI	Q	A						F	Reserv	ed				
	67	0 0 1	69				70	3				71	N	72	N	73			74	75							80
											Sect	tion I	B: Fac	ility D	ata												
incl <b>City</b>	Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)  City of Pine Bluff Wastewater Utility – Boyd Point Treatment Facility  East of Hwy. 79 North, South of the Arkansas River  Permit Effective Date  -8:30 a.m. 12/3/07  February 1, 2004																										
Seci	tion 22,	Township 5 ounty, Arkan	South,				arer									Time/ 5 <b>p.m</b>		12/	03/07			Permit Expiration Date  January 31, 2009					
Vin	cent Mi	On-Site Rep les, Laborato penter, Senio	ory Sup	perviso	r		none ar ) <b>535-</b> 0				) 5-6243	Fax									Oth	er Faci	ility D	ata			
Ken Pin 152	Name, Address of Responsible Official/Title/Phone and Fax Number  Ken Johnson, Manager  Pine Bluff Wastewater Utility  1520 South Ohio Street  Pine Bluff, Arkansas 71601-6055  Contacted  Yes No ✓																										
							(S =	Satisf						<b>ed Du</b> i Insatist	_	-		Evalı	ıated)								
S	Permi	it			S	F	Flow M	<b>1</b> easu	remen	ıt			S	Ope	perations & Maintenance S				S	Sampling							
M	Recor	ds/Reports			S	s	Self-M	onito	ring P	rogra	am		S	Slud	Sludge Handling/Disposal				N	N Pollution Prevention							
S	Facili	ty Site Revi	ew		N	- '	Compl	iance	Sched	lules			S	Pret	Pretreatment N					Multimedia							
S Effluent/Receiving Waters M Laboratory N Storm Water S							Othe	r: Eff	luent	Limi	ts																
A routine inspection was conducted to determine compliance status with the Arkansas Water and Air Pollution Control Act, the Federal Clean Water Act, and the regulations promulgated thereunder. The inspection revealed the following violation:  Inadequate certification and calibration of laboratory thermometers. The last certification documentation available was dated April 25, 2006.																											
	Name(s) and Signature(s) of Inspector(s)  Agency/Office/Telephone/Fax  ADEQ/ Stuttgart/ (870) 673-8846/ (870) 673-7236  Date  December 4, 2007																										

Agency/Office/Phone and Fax Numbers

Signature of Reviewer

Date

ADEQ Water NPDES Inspection	AFIN: <b>35-00149</b>	Permit #: AR0033316

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y □N □NA □NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□y □n ☑na □ne
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑y □n □na □ne
4. ALL DISCHARGES ARE PERMITTED:	☑Y □N □NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	□S ☑M □U □NA □NE
DETAILS: No certification of laboratory thermometers calibration.	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑y □n □na □ne
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m □u □na □ne
a. DATES AND TIME(S) OF SAMPLING:	☑y □n □na □ne
b. EXACT LOCATION(S) OF SAMPLING:	☑y □n □na □ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑y □n □na □ne
e. RESULTS OF CALIBRATIONS:	☑Y □N □NA □NE
f. RESULTS OF ANALYSES:	☑y □n □na □ne
g. DATES AND TIMES OF ANALYSES:	☑y □n □na □ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y □N □NA □NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	□s □m ☑u □na □ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	⊠s □m □u □na □ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑y □n □na □ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☑S □M □U □NA □NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	⊠s □m □u □na □ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	⊠s □m □u □na □ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	⊠s □m □u □na □ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	⊠s □m □u □na □ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	⊠s □m □u □na □ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	⊠s □m □u □na □ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑s □m □u □na □ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	□y □n ☑na □ne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y □N □NA □NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y □N □NA □NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	□y Øn □na □ne
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	□y □n ☑na □ne
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	□y □n ☑na □ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□y Øn □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□y □n ☑na □ne

ADEQ Water NPDES Inspection	AFIN: <b>35-00149</b>	Permit #: AR0033316

SECTION	D: SAMPLING	
	E SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	az er imi zinte inizz re r zinimi rezgentziniz	
	TAKEN AT SITE(S) SPECIFIED IN PERMIT:	⊠y □n □na □ne
	S ADEQUATE FOR REPRESENTATIVE SAMPLES:	MY ON ONA ONE
3. FLOW PRO	PORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	✓Y □N □NA □NE
4. SAMPLING	AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	✓Y □N □NA □NE
5. SAMPLING	AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	✓Y □N □NA □NE
6. SAMPLE C	OLLECTION PROCEDURES ADEQUATE:	✓Y □N □NA □NE
	REFRIGERATED DURING COMPOSITING:	Øy □n □na □ne
b. PROPER P	RESERVATION TECHNIQUES USED:	⊠y □n □na □ne
	RS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y □N □NA □NE
	RING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□Y □N ØNA □NE
SECTION	E: FLOW MEASUREMENT	
	E FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	⊠S □M □U □NA □NE
DETAILS:		
	FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE:: 2' Parshall Flume	⊠y □n □na □ne
2. FLOW MEA	SURED AT EACH OUTFALL AS REQUIRED:	⊠y □n □na □ne
3. SECONDAI	RY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	⊠y □n □na □ne
4. CALIBRATI	ON FREQUENCY ADEQUATE:	⊠y □n □na □ne
5. RECORDS	MAINTAINED OF CALIBRATION PROCEDURES:	☑Y □N □NA □NE
6. CALIBRATI	ON CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	⊠y □n □na □ne
7. FLOW ENT	ERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	⊠y □n □na □ne
8. FLOW MEA	SUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑y □n □na □ne
9. HEAD MEA	SURED AT PROPER LOCATION:	☑y □n □na □ne
SECTION	F: LABORATORY	
PERMITTE	E LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	□S ☑M □U □NA □NE
DETAILS:_	No certification of laboratory thermometers calibration.	
1. EPA APPR	OVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☑Y □N □NA □NE
2. IF ALTERN	ATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	□Y □N ☑NA □NE
3. SATISFACT	ORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	□y Øn □na □ne
4. QUALITY C	ONTROL PROCEDURES ADEQUATE:	☑Y □N □NA □NE
5. DUPLICATI	E SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑y □n □na □ne
6. SPIKED SA	MPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE
7. COMMERC	IAL LABORATORY USED:	☑Y □N □NA □NE
a. LAB NAME	Environmental Testing & Consulting, Inc.	
b. LAB ADDR	ESS: 2790 Whitten Road, Memphis, Tennessee 38133-4753	
c. PARAMETE	ERS PERFORMED: Biomonitoring	
8. BIOMONITO	DRING PROCEDURES ADEQUATE:	Øy □n □na □ne
a. PROPER C	RGANISMS USED:	☑Y □N □NA □NE
b. PROPER D	ILUTION SERIES FOLLOWED:	☑Y □N □NA □NE
c. PROPER T	EST METHODS AND DURATION:	Øy □n □na □ne
d. RETESTS /	AND/OR TRE PERFORMED AS REQUIRED:	Øy □n □na □ne

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SECTION	SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS										
BASED O	⊠s □м □	lu □na □ne									
DETAILS:			<u> </u>								
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER				
001	None	None	None	None	None	Lt. Green	-				
				<u> </u>	1	<u>l</u>	<u> </u>				
SECTION	H: SLUDGE	DISPOSAL									
	Øs □m □	lu □na □ne									
DETAILS:											
1. SLUDGE I	MANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □w	I DU DNA DNE				
2. SLUDGE I	RECORDS MAINTAINED	D AS REQUIRED BY 4	0 CFR 503:			⊠s □w	I □U □NA □NE				
3. FOR LANI	APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE):						
SECTION	II: SAMPLIN	G INSPECTION	ON PROCED	URES							
SAMPLE	RESULTS WITH	HIN PERMIT R	EQUIREMENT	ΓS		□s □m □	U □NA ☑NE				
DETAILS:					•						
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				□Y	′ □N □NA ☑NE				
2. TYPE OF	SAMPLE: GRAB:_	□COMPOSITE: N	METHOD: FREQUE	ENCY:							
3. SAMPLES	PRESERVED:					□Y	′ □N □NA ☑NE				
4. FLOW PR	OPORTIONED SAMPLE	S OBTAINED:				Y	′ □N □NA ☑NE				
5. SAMPLE	DBTAINED FROM FACIL	LITY'S SAMPLING DE\	/ICE:			Π	′ □N □NA ☑NE				
6. SAMPLE	REPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			Y	′ □N □NA ☑NE				
7. SAMPLE S	SPLIT WITH PERMITTEI	E:					′ □N □NA ☑NE				
8. CHAIN-OF	-CUSTODY PROCEDU	RES EMPLOYED:					□y □n □na ☑ne				
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:				′ □N □NA ☑NE				
SECTION	J: STORM V	<b>NATER POLI</b>	LUTION PRE	VENTION PLA	AN						
STORM W	/ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	3	□s □m □	IU □NA ☑NE				
DETAILS:											
1. SWPPP U	PDATED AS NEEDED:	_ DATE OF LAST UP	DATE:				′ □N □NA ☑NE				
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:				' □N □NA ☑NE				
3. POLLUTIO	3. POLLUTION PREVENTION TEAM IDENTIFIED:										
4. POLLUTIO	I. POLLUTION PREVENTION TEAM PROPERLY TRAINED:       □Y □N □NA ☑NE         II. ST OF POTENTIAL POLLUTANT SOURCES:       □Y □N □NA ☑NE										
5. LIST OF P	5. LIST OF POTENTIAL POLLUTANT SOURCES:										
6. LIST OF P		' □N □NA ☑NE									
7. ALL NON-		' □N □NA ☑NE									
8. LIST OF STRUCTURAL BMPS:											
	ON-STRUCTURAL BMF						' □N □NA ☑NE				
	OPERLY OPERATED AI						' □N □NA ☑NE				
11. INSPECTI	11. INSPECTIONS CONDUCTED AS REQUIRED:										

FLOW CALCULATION SHEET										
Date: 12/03/07 Time: 11:15 a.m.										
Head in Inches:   15 Feet:   1.5										
Type & Size of Primary Flow Measurement Device: 2' Parshall Flume										
			ľ							
Name & Mo	del of Secondary	Flow Measurement De	vice:   ISCO 2	2410						
Date of last	Calibration of Se	condary Flow Device: N	March 8, 2007							
Recorded F	low at Date & Tim	ne Listed Above: 10.0	<u>1</u>	(Facility Flow Meter)						
				T						
	Flow at Date & Ti			eth e w						
(Flow is calculate	ed using flow charts in:	ISCO Open Channel Flow Meas	urement Handbook-	<u>b<sup></sup>Edition</u> )						
	Recorded Value	- Calculated Value								
% Error =		ulated Value	─ X 100							
	Calci	dialed value								
	10.01	- 9.69								
% Error =	10.01	9.69	─ X 100							
		0.00								
	.32									
% Error =	9.69	X 100								
% Error =	.033	X 100								
% Error =	3.3	%								
_	<u>-</u>									
Comments:										

## **DMR Calculation Check**

Reporting Period: From 2007 10 01 To 2007 10 31 Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass	Concentration Monthly				
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l			
Reported Value:		65	71			
Calculated Value:		65	71			
Permit Value:		90	135			

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

#037498

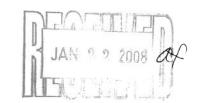
## PINE BLUFF WASTEWATER UTILITY

#1021247

1520 S. OHIO ST. PINE BLUFF, ARKANSAS 71601-6055 PHONE: (870) 535-6603 FAX (870) 535-6243

January 15, 2008

Mr. Steven L. Henderson District 6 Inspector, Water Division ADEQ 5301 North Shore Drive North Little Rock, AR 72118-5317



RE: AFIN: 35-00149 NPDES Permit No.: AR0033316

Dear Mr. Henderson:

This letter is in response to a finding revealed during your compliance inspection of our Wastewater Treatment Facility on December 3, 2007. The following finding is listed, followed by our response:

Inadequate certification and calibration of laboratory thermometers. The last certification documentation available was dated April 25, 2006.

We have contacted an outside source that certify and calibrate our NBS laboratory thermometer annually. Generally, we schedule the certification and calibration of the laboratory thermometer to coincide with the time frame that our balances are calibrated. When the service technician arrived to certify and calibrate the balances, he failed to take the NBS thermometer for the annual calibration and certification.

In the future, we will ensure that the thermometer is sent off for calibration and certification. In addition, we will add this requirement to our checklist to prevent future reoccurrence.

If you should have any other questions or concerns, please contact me at (870) 535-6603.

Sincerely

Manager

Cc: Vincent Miles, E.C. Supervisor Stacy Carpenter, Lab Supervisor