ADEQ

A R K A N S A S
Department of Environmental Quality

December 20, 2007

Mr. Daniel Dawson, Assistant General Manager
Searcy Board of Public Utilities
PO Box 1319
Searcy, AR 72145

RE: Routine Compliance Inspection

NPDES Permit No.: AR0021601, AFIN: 73-00055

Dear Mr. Dawson:

On December 18, 2007, Dale Washam, Jill Glenn, 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. All the treatment units were not in service as required by Part II, Section B, paragraph 1 of the permit. Specifically, the grit removal operation was not in service at the time of the inspection.

2. Table II and Table III pollutants are not being sampled as required by Part III, 8(C) of the permit. Specifically, the influent 24-hour composite sample is not being collected in proportion to flow and the grab sample parameters (influent and effluent) are not being collected by four (4) grab samples at equal intervals over the 24 hour period.

3. Effluent samples were not being collected by 24-hour flow proportional sampling method as required by the permit. Part I, Section A of the permit requires BOD and TSS to be collected by 24-hour composite sample. Part IV (20) of the permit defines 24-hour composite sample as a minimum of 12 effluent portions collected at equal time intervals over the 24-hour period and combined proportional to flow or a sample collected at frequent intervals proportional to flow over the 24-hour period. According to your staff, the flow meter output used to pace the sampler became inoperable on December 4, 2007. Please be sure to report with the December 2007 DMR, this violation as required by Part II, Section D, paragraph 7 of the permit.

4. The alarm system on the main pumping station is inoperable. This is a violation of Part II, Section B, paragraph 1 of the permit.

5. The Searcy Board of Public Utilities filed a "no exposure" certification in lieu of developing and implementing a stormwater pollution prevention plan (SWPPP) as required by Part III, 10 of the permit. During the inspection, out of service equipment, screenings, and solids handling were noted as being exposed to rainfall (see photographs 1 and 2). The Department will terminate NPDES Permit ARR00C389 and require compliance with Part III, 10 of the permit. Therefore, it will be necessary to develop and implement a SWPPP as required by the permit. A copy of the SWPPP should be submitted with your response to this inspection.

6. The barometer used by the laboratory to calibrate the dissolved oxygen meter has not been calibrated or checked against a known source. This is a violation of Part II, Section B, paragraph 1 of the permit which requires adequate laboratory controls and appropriate quality assurance procedures.

7. The operator of the sludge belt press is unlicensed. The Arkansas Pollution Control and Ecology Commission Regulation No. 3, Chapter 3 states "Anyone whose regular job duties may directly affect the process operation of the wastewater treatment plant must obtain a license under this Regulation." Therefore, the Searcy Board of Public is in violation of this section of Regulation No. 3. It is recommended that the Searcy Board of Public Utilities obtain an apprentice license for this individual until such time as the operator can obtain a Class I license.

8. The new main pump station has an outfall that is not permitted. The Arkansas Water and Air Pollution Control Act (A.C.A. § 8-4-217(b)(1)) prohibits the construction or use of any outfall unless that outfall is permitted. This outfall is not included in your permit. The Searcy Board of Public Utilities can either eliminate the outfall (permanently plug or remove), get a permit for the outfall (very unlikely due to lack of treatment prior to this outfall), or construct holding pond for the overflow. The third option would require a construction permit from the permit's section.

9. The overflow weirs on the sludge thickener had chunks of grease on them which can lead to short circuiting. This is a violation of Part II, Section B, paragraph 1 of the permit (Proper Operations and Maintenance).

10. The effluent sampler sample collection line was contaminated with mold or other type of biological slime. The process of collecting samples can lead to the shearing of this material and it's deposition into the sample jug. This can lead to sample results which are not representative of the discharge. Routine cleaning and maintenance of all of your automatic wastewater samplers is recommended to ensure that they are operating as designed and are collecting samples representative of the discharge. This is a violation of Part II, Section B, paragraph 1 of the permit (Proper Operations and Maintenance).

11. The current location for measuring discharge flow is not in compliance with the permit which requires flow to be measured after the final treatment unit. However, this issue is addressed in the renewal permit effective January 1, 2008, and therefore does not require any further action by the Searcy Board of Public Utilities.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department. 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 **January 21, 2008**.

If I can be any assistance, please contact me at benson@adeq.state.ar.us or 501-683-0827.

Sincerely,

Dennis Benson
District 9 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

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

Section A: National Data System Coding

1	2	3	NPDES	11	12	Yr/Mo/Day	17	18	Inspec. Type	19	Inspector	20	Fac. Type
Transaction Code													
N	5		AR0021601			071218			C		S		1

Remarks: **AFIN 73-00055 WHITE COUNTY**

67	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
Inspection Work Days												
		2			N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
Searcy Wastewater Treatment Facility
260 North Bypass Road
Searcy, AR 72143
AR0021601

Entry Time/Date: **12/18/07 @ 09:25 am**

Permit Effective Date: **12/01/02**

Exit Time/Date: **12/18/07 @ 4:25 pm**

Permit Expiration Date: **11/30/07**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Paul Abernathy, 501-268-1679/501-268-9463

Other Facility Data
Currently operating under expired permit. New permit is scheduled to become effective 1/1/08

Name, Address of Responsible Official/Title/Phone and Fax Number
Daniel Dawson, Assistant General Manager
Searcy Board of Public Utilities
P.O. Box 1319
Searcy, AR 72145

Contacted
Yes ☑ No ☐

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

1. The new main pumping station has a constructed outfall which is not permitted. A.C.A. § 8-4-217(b)(1)(D) prohibits the construction of any outfall to the Waters of the State without a permit.

2. The Permittee filed a "no exposure" certificate with the Department in lieu of developing a Storm Water Pollution Prevention Plan (SWPPP). Several pieces of used equipment were exposed to rainfall and the screening operation spillage is exposed to rainfall.

3. Influent and effluent samples are not being collected as a 24-hour flow proportional sample. The influent sampler does not have a flow meter to pace the sampler or to facilitate manual compositing and the effluent sampler has been out since December 4, 2007. In addition, the Table II pollutants required to be collected by 4 grab samples have not been collected in accordance with Part III, 8C of the permit. Only 3 grab samples per day were collected rather than the 4 samples required by the permit.

4. The grit removal operation was not in service at the time of the inspection.

5. The main pumping station does not have a functioning alarm system.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Dennis Benson	**AR Dept. of Environmental Quality-** **(501) 683-0827/(501) 682-0910 (Fax)**	
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☐S ☑M ☐U ☐NA ☐NE

DETAILS: **A discharge point exists at Main Pumping Station on treatment plant grounds.**

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: **Maintenance log not updated, several gaps in time**

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: **Total Residual Chlorine analysis on 12/13/07 did not list analyst**	☑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: **Maintenance schedules have not been revised to include new clarifiers**	☐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: **Alarm for main pumping station is out**	☐S ☐M ☑U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE: **Grit removal air lift was not working**	☐S ☐M ☑U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: **Filter press operator is not licensed**	☐S ☑M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: **Inventory last updated July 2007, not clearly organized**	☐S ☐M ☑U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: **Needs updating**	☑Y ☐N ☐NA ☐NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☐Y ☑N ☐NA ☐NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: **Only a call list**	☑Y ☐N ☐NA ☐NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☑Y ☐N ☐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 ☑N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☐Y ☐N ☑NA ☐NE

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☐S ☐M ☑U ☐NA ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT: **Influent samples were time weighted, effluent samples time weighted since 12/4/07**	☐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 COLLECTION PROCEDURES ADEQUATE: **Table II Grab samples must be 4 grabs, VOCs only 3 grab samples**	☐Y ☑N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐N ☐NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y ☐N ☐NA ☐NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y ☐N ☐NA ☐NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☑Y ☐N ☐NA ☐NE

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:__ TYPE OF DEVICE: **2' Parshall Flume**	☑Y ☐N ☐NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y ☐N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☐S ☑M ☐U ☐NA ☐NE
DETAILS: **Barometer used to calibrate DO meter has not been calibrated nor checked against a standard**	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☑Y ☐N ☐NA ☐NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐Y ☐N ☑NA ☐NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☐Y ☑N ☐NA ☐NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
7. COMMERCIAL LABORATORY USED:	☐Y ☑N ☐NA ☐NE
a. LAB NAME:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:	☑Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:	☑Y ☐N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION:	☑Y ☐N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐Y ☐N ☑NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY ☐S ☑M ☐U ☐NA ☐NE

DETAILS: **Moderate foaming at Outfall**

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	none	Moderate	None	none	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **screenings, grit, and primary sludge to landfill, secondary sludge stored on site**

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☐S ☐M ☐U ☑NA ☐NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☑N ☐NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☐NA ☑NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☐NA ☑NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☐NA ☑NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☐NA ☑NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☐NA ☑NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☐NA ☑NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☐NA ☑NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS ☐S ☐M ☑U ☐NA ☐NE

DETAILS: **No exposure certification, however, materials exposed to rainfall**

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☑NA ☐NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☑NA ☐NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☑NA ☐NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☑NA ☐NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☑NA ☐NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☑NA ☐NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☑NA ☐NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☑NA ☐NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☑NA ☐NE

FLOW CALCULATION SHEET

Date: **12/18/07** Time: **10:53**

Head in Inches: _____ Feet: **1.15**

Type & Size of Primary Flow Measurement Device:
2 foot Parshall flume

Name & Model of Secondary Flow Measurement Device:
Siemens Milltronics OCM III – calibrated 9/28/07

Recorded Flow at Date & Time Listed Above: **6.39 mgd** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **6.421 mgd**
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{6.39 - 6.42}{6.42} \times 100$$

$$\% \text{ Error} = \frac{-.03}{6.42} \times 100$$

% Error = -.0047 X 100

% Error = **-0.47** %

Comments:

DMR Calculation Check

Reporting Period: From 07 (Year) 10 (Month) 01 (Day) **To** 07 (Year) 10 (Month) 31 (Day)

Parameter Checked: BOD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	231	6	10
Calculated Value:	231	6	10
Permit Value:	1877	45	67.5

If calculated value does not equal reported value, explain:

Searcy Board of Public Utilities is correctly calculating the monthly average as a flow weighted average, however, effective with the renewal permit (January 1, 2008), monthly average concentration will no longer be a flow weighted average. Please see the definition of monthly average in Part IV of the renewal permit.

DMR Calculation Check

Reporting Period: **From** 07 (Year) 10 (Month) 01 (Day) **To** 07 (Year) 10 (Month) 31 (Day)

Parameter Checked: **Fecal Coliform**

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	n/a	9	30
Calculated Value:	n/a	9	30
Permit Value:	n/a	1000	2000

If calculated value does not equal reported value, explain:

NPDES Compliance Inspection Report
Further Explanation

1. The facility filed a “no exposure” certification in lieu of preparing and implementing a stormwater pollution prevention plan (SWPPP). The inspection revealed equipment taken out of service that was exposed to rainfall. In addition the preliminary treatment (screening and grit removal), results in materials being exposed to rainfall in area that requires management of drainage system. Also, there was a unpermitted discharge of wash water from the sludge belt press operation (see photograph 3). Development and implementation of a SWPPP is required.
2. Chunks of grease were noted on the weirs in the thickener.
3. Samples for Table II and Table III pollutants are not being collected in accordance with Part III, 8(C) of the permit. The influent 24-hour composite samples are not being collected by flow proportional sampling methodology and the grab sample parameters are not being collected by 4 grab samples taken over equal intervals during a representative 24-hour period. (see Page 4 of Part III of your permit for details).
4. The alarm system on the main pumping station was not operable.
5. The operator of the sludge belt press is not licensed. The City should obtain an apprentice license for the operator until a license can be obtained.
6. The barometer in the laboratory that is used to calibrate the DO meter has not been calibrated nor checked against a known source.
7. The inventory of spare parts is limited and has not been updated since July 2007. Parts that were available do not appear to be well organized and quickly accessible.
8. The air lift on grit removal was not operational at the time of the inspection.
9. Maintenance records were poor. Last maintenance checklist completed was for July 2007.
10. The clear flow sample collection line on the effluent sampler is contaminated with mold or some type of biological slime which can bias the samples. This line should be routinely inspected and replaced when necessary.
11. The current location to measure flow is not in compliance with the permit which requires flow to be measured after the last treatment unit. However, the renewal permit, effective January 1, 2008, addresses this issue. No further action is required.

ADEQ

A R K A N S A S
Department of Environmental Quality

Photographic Evidence Sheet

Location:	**Searcy Wastewater Treatment Facility**						
Photographer:	Dale Washam			**Witness:**	Dennis Benson		
Photo #	1	**Of**	6	**Date:**	12/18/07	**Time:**	10:47 am
Description:	Out of Service Equipment Exposed to Rainfall						

Photographer:	Dale Washam			**Witness:**	Dennis Benson		
Photo #	2	**Of**	6	**Date:**	12/18/07	**Time:**	10:46 am
Description:	Out of Service Equipment Exposed to Rainfall						

ADEQ

A R K A N S A S
Department of Environmental Quality

Photographic Evidence Sheet

Location:	**Searcy Wastewater Treatment Facility**						
Photographer:	Dale Washam			**Witness:**	Dennis Benson		
Photo #	3	**Of**	6	**Date:**	12/18/07	**Time:**	09:50 am
Description:	Wash water coming from sludge processing area. This is an unpermitted discharge.						

Photographer:	Dale Washam			**Witness:**	Dennis Benson		
Photo #	4	**Of**	6	**Date:**	12/18/07	**Time:**	2:25 pm
Description:	Outfall from main wastewater pumping station.						

ADEQ

A R K A N S A S
Department of Environmental Quality

Photographic Evidence Sheet

Location:	**Searcy Wastewater Treatment Facility**						
Photographer:	Dale Washam			**Witness:**	Dennis Benson		
Photo #	5	**Of**	6	**Date:**	12/18/07	**Time:**	10:28 am
Description:	Grit and screenings collection area. Standpipe in drain requires removal to route water to head of the treatment plant. This is management of stormwater.						

Photographer:	Dale Washam			**Witness:**	Dennis Benson		
Photo #	6	**Of**	6	**Date:**	12/18/07	**Time:**	10:25 am
Description:	Chunks of grease in overflow weirs.