

February 25, 2008

Mr. James Tilley, Manager Camden Water Utilities P.O. Drawer J Camden, AR 71711

RE: Compliance Inspection

AFIN: 52-00073 NPDES Permit No.: AR0022365

Dear Mr. Tilley:

On January 30, 2008, I performed a routine compliance inspection of the Camden Wastewater 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:

- 1. The facility had an excessive amount of sludge spilled on the asphalt underneath the dump truck at the sludge plant.
- 2. The facility had an aerator gear box out of service at the time of inspection.
- 3. The name and address of the contract lab was not printed on the DMR for labs which perform bio-monitoring and metals.
- 4. The facility's Storm Water Pollution Prevention Plan (SWPPP) did not contain any language concerning inspections or the annual Comprehensive Site Evaluations which must be conducted by the facility.
- 5. The facility's SWPPP was not signed and certified for non-storm water discharges.
- 6. The facility did not have any annual employee training records as outlined in the SWPPP.

The above items require your immediate attention. Please submit a written response to these findings 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 items noted. This corrective action should be completed as soon as possible, and the written response is due by March 17, 2008.

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

If I can be of any assistance, please contact me at 870-682-0680.

Sincerely,

John W. Lamb

District 8 Field Inspector

John W. Land

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

⇒ EPA								Form Approved OMB No. 2040-0003					
	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460												
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incl	ne and Location of Facility Inspected and POTW name and NPDES permit anden Wastewater Treatment Plant	num		rial use	rs disc	chargi	ing to	POT	W, also)	Entry Time/Date 9:18/01/30/08		Permit Effective Date 01 November 2007
	ner of Gibson and Jasper nden, AR										Exit Time/Date 12:02/01/30/08		Permit Expiration Date 31 October 2012
	ne(s) of On-Site Representative(s)/Teth Ballard, Wastewater Plant Man					nber(s)					Oth	ner Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number James Tilley, Manager/870-836-7331 Camden Water Utilities P.O. Drawer J Camden, AR 71711 Camden, AR 71711 Contacted Yes No													
			(5	- Catia							uring Inspection		
M	Permit	S	Ì	Measu		•	– Iviai	igiliai	M		isfactory, N = Not Evaluated) perations & Maintenance	S	Sampling
S	Records/Reports	S	ł	Monito			am		U				Pollution Prevention
M	Facility Site Review	N	i	pliance	_	_			N	-			Multimedia
S	Effluent/Receiving Waters	S	Lab	oratory					U	Storm Water			Other:
		Se	ction I): Sum	mary	of Fir	nding	s/Co1	mment	s (At	tach additional sheets if necessar	ry)	
Section B: The facility uses outside contract labs for metals and bio-monitoring. The name and address of these contract labs did not appear on the DMRs for metals or bio-monitoring as required by the permit. Section C, item 5: The facility had one aerator set out of service due to a gear box that had failed. The facility had the gear box off for repairs. Section J, item 1: The facility Storm Water Pollution Prevention Plan (SWPPP) needed to be updated to include: A signed certification statement for non-storm water discharges. Section J, item 4: The facility did not have any training records for employees. The SWPPP states that the employees will be trained annually. Section J, item 11: The facility's SWPPP did not contain any language concerning inspections or the Annual Comprehensive Site Evaluation which is required by the permit. Section H: The facility had an excessive amount of sludge spilled outside the sludge plant on the asphalt underneath the dump truck which hauls the sludge to the landfill.													
State 11 January 1				Depa	artmen	t of E	/Fax invironmental Quality Oorado, AR 71730		Date				
John	n W. Lamb					870	-862-	0680	/ Fax 8	70-86	52-3509		
						<u> </u>							
Signature of Reviewer Agency/Office/Phone are					e/Phone and Fax Numbers			Date					

ADEQ Water NPDES Inspection	AFIN: 52-00073	Permit #: AR0022365

SECTION A: PERMIT VERIFICATION	·
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S □M □U □NA □NE
DETAILS:	
CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y □N □NA □NE
NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	✓Y □N □NA □NE
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: see page 1	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	Øy □n □na □ne
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m □u □na □ne
a. DATES AND TIME(S) OF SAMPLING:	Øy □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:	Øy □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: see page 1	
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 ØM □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 □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:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N □NA ☑NE

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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:	☑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:	☑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:	Øy □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: parshall plum	e Øy □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:	Øy □n □na □ne
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	Øy □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:	
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: Environmental Services and Bio-Analytical	
b. LAB ADDRESS: <u>Little Rock</u> and <u>Doyline, LA</u>	
c. PARAMETERS PERFORMED: metal and bio-monitoring.	
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

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SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS										
	BASED ON VISUAL OBSERVATIONS ONLY									
DETAILS:										
OUTFALL #:	UTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COL						OTHER			
002	None	None	Slight	None	Trace	grey				
SECTION	H: SLUDGE	DISPOSAL								
SLUDGE I	DISPOSAL MEI	ETS PERMIT I	REQUIREMEN	TS		□s □m ☑	U □NA □NE			
DETAILS:	see page 1									
1. SLUDGE N	MANAGEMENT ADEQU	IATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □m	□U □NA □NE			
2. SLUDGE F	RECORDS MAINTAINE	D AS REQUIRED BY 4	0 CFR 503:			⊠s □м	□U □NA □NE			
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PU	BLIC CONTACT SITE):					
SECTION	II: SAMPLIN	G INSPECTION	ON PROCED	URES						
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	ΓS		□ѕ□м□	U ⊠NA □NE			
DETAILS:										
1. SAMPLES	OBTAINED THIS INSP	ECTION:				□Y	⊠n □na □ne			
2. TYPE OF S	SAMPLE: GRAB:	□COMPOSITE:	METHOD: FREQUE	ENCY:						
3. SAMPLES	SAMPLES PRESERVED:									
4. FLOW PRO	FLOW PROPORTIONED SAMPLES OBTAINED:									
5. SAMPLE C	BTAINED FROM FACI	LITY'S SAMPLING DE	VICE:			□Y	□n ☑na □ne			
6. SAMPLE F	REPRESENTATIVE OF	VOLUME AND NATUR	RE OF DISCHARGE:			□Y	□n ☑na □ne			
7. SAMPLE S	PLIT WITH PERMITTE	E:				□Y	□n ☑na □ne			
8. CHAIN-OF	-CUSTODY PROCEDU	RES EMPLOYED:				□Y	□n Øna □ne			
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IIT:			□Y	□n Øna □ne			
SECTION	J: STORM V	NATER POLI	LUTION PRE	VENTION PL	AN					
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	3	□s □m	U □NA □NE			
DETAILS:	see page 1				<u>.</u>					
1. SWPPP UI	PDATED AS NEEDED:	DATE OF LAST UP	PDATE:			□Y	⊠n □na □ne			
2. SITE MAP	INCLUDING ALL DISCI	HARGES AND SURFA	CE WATERS:			✓Y	□N □NA □NE			
3. POLLUTIO	N PREVENTION TEAM	1 IDENTIFIED:				✓Y	□N □NA □NE			
4. POLLUTIO										
5. LIST OF P										
6. LIST OF P	OTENTIAL SOURCES A	AND PAST SPILLS AN	D LEAKS:			✓Y	□N □NA □NE			
7. ALL NON-S	7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:									
8. LIST OF S	8. LIST OF STRUCTURAL BMPS: MY IN INA INE									
9. LIST OF N	LIST OF NON-STRUCTURAL BMPS:									
10. BMPS PRO	0. BMPS PROPERLY OPERATED AND MAINTAINED:									
11. INSPECTION	ONS CONDUCTED AS	REQUIRED:				□Y	Øn □na □ne			

FLOW CALCULATION SHEET								
Date: 1-3	0-08	Time: 10:	12					
		•	,					
Head in Inc	hes:	Feet:	0.85					
			<u> </u>					
Type & Size	e of Primary Flow	Measuren	nent De	vice:	12" parsh	all flun	ne	
71	,				·			
Name & Mo	del of Secondary	/ Flow Mea	asureme	ent Dev	vice: Pro	sonics F	MU861	
				<u> </u>				
Date of last	Calibration of Se	econdary F	low Dev	/ice: 2	5 April 20	007		
Date of last	- Cambration of Co	occinaci y i	1011 201	100. 2	.o / \pi <u></u>	301		
Recorded F	low at Date & Tir	me Listed A	Ahove:	2.0 m	nad		(Facility Flow Meter	`
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Calculated	Flow at Date & T	ima l istad	Δηονα:	2.01	10			
	ed using flow charts in:			_	-	dbook-5 th	Edition)	
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% Error =	.009	X 100						
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0/ Error	0.0	0/						
% Error =	0.9	%						
Commonte	Loop their 40							
Comments:	Comments: Less than 10 percent is acceptable							

DMR Calculation Check

Reporting Period: From 2007 Dec 01 To 2007 Dec 31

Year Month Day Year Month Day

Parameter Checked: NH3-N

	Loading Mass	Concentration Monthly			
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l		
Reported Value:	5.25	0.28	0.39		
Calculated Value:	5.25	0.28	0.39		
Permit Value:	146	5.0	7.5		

If calculated value does not equal reported value, explain: <u>Equal</u>