

June 3, 2008

Kirby Murray, Public Works Director City of Berryville P.O. Box 227 Berryville, Arkansas 72616

RE: Permit Compliance Inspection & Compliance Sampling Inspection

AFIN: 08-00034 NPDES Permit No.: AR0021792

Dear Mr. Murray:

On April 29-30, 2008, I performed a routine permit compliance inspection and a compliance sampling inspection of the 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 violation:

• The name and address of the contract laboratory used for sampling and/or analysis is not included on the Discharge Monitoring Reports as required by Part II.C.5 of your permit.

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

Water Division Enforcement Branch 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 June 23, 2008.

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

Kirby Murray, City of Berryville POTW June 3, 2008 Page 2

If I can be of any assistance, please contact me at 479-267-0811, ext. 16.

Sincerely,

John Fazio

District 1 Field Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

ADEQ Water NPDES Inspection	AFIN: <b>08-00034</b>	Permit #: AR00	021792
<b>≎</b> EPA			Form Approved OMB No. 2040-0003
	ONMENTAL PROTECTION AGENCY ngton, D.C. 20460		
NPDES Complian	nce Inspection I	Report	
	Section A: National Data Sy	estem Coding	•
Transaction Code         NPDES           1         N         2         5         3         A         R         0         0         2         1	7 9 2 11 12 0	Yr/Mo/Day 8 0 4 2 9 17	Inspec. Type Inspector Fac. Type 18 S 20 1
A F I N 0 8 - 0 0	0   3   4		
Inspection Work Days Facility Evaluation 67 69 70 4	on Rating BI 71 N 72	QA 73 74 75	Reserved
	Section B: Facility	Data	
Name and Location of Facility Inspected (For industrial users include POTW name and NPDES permit number)  City of Berryville	discharging to POTW, also	Entry Time/Date <b>0915 / 04-29-08</b>	Permit Effective Date December 01, 2007
1000 W. Cedarvale Berryville, Arkansas		Exit Time/Date 1005 / 04-30-08	Permit Expiration Date November 30, 2012
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax I Mike Maynard, Operator / Greg Watts, Operator / 870-42			Other Facility Data  Facility: 36 21' 25.95", -93 34' 43.51"
Name, Address of Responsible Official/Title/Phone and Fax N Kirby Murray, Public Works Director City of Berryville P.O. Box 227 Berryville, Arkansas 72616 870-423-4074, 870-423-4501 (fax)	umber	Contacted Yes ☑ No ☐	Outfall 001: 36 21' 23.1", -93 34' 51.3"

Berryville 870-423-4 **Section C: Areas Evaluated During Inspection** (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)  $\mathbf{S}$  $\mathbf{S}$ Permit Flow Measurement Sampling Operations & Maintenance  $\mathbf{M}$  $\mathbf{S}$  $\mathbf{S}$ N Records/Reports **Pollution Prevention Self-Monitoring Program** Sludge Handling/Disposal N Ν N **Facility Site Review Compliance Schedules Pretreatment** Multimedia **Effluent/Receiving Waters Storm Water** Other: Laboratory

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

On 4/29/08 and 4/30/08, I conducted a routine permit compliance inspection and a compliance sampling inspection (CSI) of the wastewater treatment facility. DMRs and effluent data summary sheets were reviewed for the months of September, October and November, 2007. The effluent was within permit limits for those months. The facility's ISCO 4700 sampler was used for the 6-hour composite samples taken for the compliance sampling inspection. The CSI lab analysis is attached. The sample results were within permit requirements, where applicable. The CSI samples were analyzed by the ADEQ laboratory.

The following violation was noted:

The name and address of the contract laboratory used for sampling and/or analysis is not included on the DMRs.

Name(s) and Signature(s) of Inspector(s)  John Fazio	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811, ext. 16; 479-267-0819 (fax)	Date May 29, 2008
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ADEQ Water NPDES Inspection	AFIN: <b>08-00034</b>	Permit #: AR0021792

	1
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
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□y □n Øna □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: * The name and address of the contract laboratory used for sampling and/or analysis is	not included on the DMRs.
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: <u>In-house available for pH and DO</u>	☑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: Generator	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: Computer call-out	☑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: SSOs in collection system	☑Y □N □NA □NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	Øy □n □na □ne
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: Overflows	Øy □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

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SE	ECTION D: SAMPLING		
PE	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS		☑S □M □U □NA □NE
	ETAILS:	L	
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:		MY ON ONE
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:		✓Y □N □NA □NE
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:		☑Y □N □NA □NE
а	. SAMPLES REFRIGERATED DURING COMPOSITING:		☑Y □N □NA □NE
b	. PROPER PRESERVATION TECHNIQUES USED:		☑y □n □na □ne
С	: 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
SE	ECTION E: FLOW MEASUREMENT		
	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS		☑S □M □U □NA □NE
	TAILS:		
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 18" Pars	hall Flu	ıme ☑Y □N □NA □NE
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:		✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:		☑Y □N □NA □NE
4.	CALIBRATION FREQUENCY ADEQUATE: Calibrated 7/19/07		☑Y □N □NA □NE
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:		☑Y □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:		MY ON ONA ONE
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:		MY ON ONA ONE
9.	HEAD MEASURED AT PROPER LOCATION: Measured and marked		MY ON ONA ONE
<u> </u>	TEAD IN LAGORED AT THOSE ER ESSATION. INCOME OF THE HEALTH OF		ET EN ENA ENC
SI	ECTION F: LABORATORY		
_	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS		☑S □M □U □NA □NE
	ETAILS:		
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:		DY ON MA ONE
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:		ØY □N □NA □NE
4.	QUALITY CONTROL PROCEDURES ADEQUATE:		ØY □N □NA □NE
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME: In-house pH and DO 100% of time		Øy □n □na □ne
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:		DY DN DNA ØNE
7.	COMMERCIAL LABORATORY USED:		ØY □N □NA □NE
	L LAB NAME: Environmental Testing Group Environmental Testing Co	neulta	
	b. LAB ADDRESS: 1702 E. Central Ave., Bentonville, AR 72712 2790 Whitten Rd., Memph		
	: PARAMETERS PERFORMED: BOD5, TSS, TDS, NH3, TP, FCB, sludge parameters  Biomonitoring	13, 114	<del>50100</del>
8.	BIOMONITORING PROCEDURES ADEQUATE:		Øy □n □na □ne
	PROPER ORGANISMS USED:		ØY □N □NA □NE
			ØY □N □NA □NE
	PROPER DILUTION SERIES FOLLOWED:		
	PROPER TEST METHODS AND DURATION:		ØY □N □NA □NE
-	I. RETESTS AND/OR TRE PERFORMED AS REQUIRED:		□y □n □na ☑ne
1			

ADEQ Water NPDES Inspection	AFIN: <b>08-00034</b>	Permit #: AR0021792

SECTION	G: EFFLUEI	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS		
	N VISUAL OBS					⊠s □m □	]U □NA □NE
	DETAILS: Slight turbidity and algae						
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	Slight	None	None	Clear	
SECTION	H: SLUDGE	DISPOSAL					
SLUDGE [	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	TS		⊠s □m □	]U □NA □NE
DETAILS:							
1. SLUDGE N	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □n	I □U □NA □NE
2. SLUDGE R	ECORDS MAINTAINED	AS REQUIRED BY 40	O CFR 503:			⊠s □n	I DU DNA DNE
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE): a	gricultural	
	_		_	_			
	I: SAMPLIN						
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S (as applicab	le)	⊠s □m □	]U □NA □NE
DETAILS:							
	OBTAINED THIS INSPI						/ □N □NA □NE
	SAMPLE: GRAB: pH	I, DO, FCB ☑COME	POSITE: <u>BOD5, TSS, N</u>	NH3, TP, TDS METHO	D: <u>6-hour</u> FREQUEN		
	PRESERVED:						/ ON ONA ONE
	PORTIONED SAMPLE	·		<u>les</u>			/ ON ONA ONE
	BTAINED FROM FACIL						/ ON ONA ONE
	EPRESENTATIVE OF \		E OF DISCHARGE:				/ ON ONA ONE
	PLIT WITH PERMITTER						∕ ØN □NA □NE
	CUSTODY PROCEDUI		.=				ON ONA ONE
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	П:			M.	/ □N □NA □NE
SECTION	J: STORM V	MATER ROLL	LITION DDE	VENTION DI	A NI		
	ATER MANAG					Пе Пм Г	]U □NA ☑NE
DETAILS:	ATEN WANAO		OT LINITITIE	QUINLIVILIVIO	<u>'</u>		IO LINA MINE
	PDATED AS NEEDED:	DATE OF LAST UP	DATE:				r □n □na ☑ne
	INCLUDING ALL DISCH	_					✓ □N □NA ☑NE
	N PREVENTION TEAM	IDENTIFIED:	-				ſ □N □NA ☑NE
						∕ □N □NA ☑NE	
7. ALL NON-S	STORM WATER DISCH	ARGES ARE AUTHOR	RIZED:				ſ □N □NA ☑NE
8. LIST OF S	TRUCTURAL BMPS:						ſ □N □NA ØNE
9. LIST OF N	9. LIST OF NON-STRUCTURAL BMPS:						
10. BMPS PRO	PERLY OPERATED A	ND MAINTAINED:					∕ □N □NA ØNE
11. INSPECTION	11. INSPECTIONS CONDUCTED AS REQUIRED:						
						•	

		FLOW CALCULATION	SHEET
Date: Ap	ril 29, 2008	Гіте: <b>1148</b>	
Head in Inc	hes: <b>8.34</b>	Feet: <b>0.73</b>	
Type & Size	e of Primary Flow	Measurement Device: 1	18" Parshall Flume
Name & Mo	odel of Secondary	Flow Measurement Dev	vice:   Wedero Panel View Plus 70
	t Calibration of Seconds	econdary Flow Device: 0 ne Listed Above: 1508	07/19/07  S gpm (Facility Flow Meter)
	Flow at Date & Tingled using flow charts in:	me Listed Above: 166 ISCO Open Channel Flow Measur	orgpm  Irement Handbook-5 <sup>th</sup> Edition)
% Error =	Recorded Value	- Calculated Value ulated Value	X 100
% Error =	1508	-   1660 1660	X 100
% Error =	-152 1660	X 100	
% Error =	-0.0916	X 100	
% Error =	-9.16	%	
Comments	<u>OK</u>		

## **DMR Calculation Check**

Reporting Period: From 09 01 07 To 09 30 07

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:	52.8	3.7	7.7	
Calculated Value:	52.8	3.7	7.7	
Permit Value:	400	20	30	

If calculated value does not equal reported value, explain:

### NPDES Compliance Inspection Report Further Explanation

• The name and address of the contract laboratory used for sampling and/or analysis is not included on the Discharge Monitoring Reports as required by Part II.C.5 of your permit.

#### **NPDES Compliance Sampling Inspection Results**

5-Day Biological Oxygen Demand 2.57 mg/L (6 hr. composite)

Total Suspended Solids 3.0 mg/L (6 hr. composite)

Total Dissolved Solids 542 mg/L (6 hr. composite)

Ammonia Nitrogen 0.26 mg/L (6 hr. composite)

Total Phosphorus 2.02 mg/L (6 hr. composite)

Fecal Coliform Bacteria ~50 cfu/100 ml (grab)

Dissolved Oxygen 8.64 mg/L (grab)

pH 7.73 SU (grab)

Flow 2.0 MGD (avg. during 6-hr. composite)

All samples and measurements, excluding fecal coliform bacteria (FCB), were taken on 4/29/08. The FCB sample was taken on 4/30/08.

The sample results were within permit requirements, where applicable.

# Company Name

Company Address Phone: Fax:

## - CERTIFICATE OF ANALYSIS -

Attn: Kirby Murray, City of Berryville Phone: 870-423-4074 Ext:

FAX: 870-423-4501

Our Lab#: 2008-1411
Your Sample ID: Berryville POTW

Report Date: 27-May-08

BOD5				
	5-day biochemical oxygen demand	2.57	mg/L	4/30/2008
TSS/TDS				
	Total suspended solids	3.0	mg/L	4/30/2008
	Total dissolved solids	542	mg/L	4/30/2008
FC-MF				
	Fecal coliform	~50	cfu/100 ml	4/30/2008
FIELD				
	Dissolved oxygen	8.64	mg/L	4/29/2008
	Field pH	7.73	SU	4/29/2008
	Water temperature	16.2	°C	4/29/2008
NH3-N-ISE				
	Ammonia as nitrogen	0.26	mg/L	5/8/2008
TKN/TKP				
	Total phosphorus as phosphorus	2.02	mg/L	5/15/2008

# City of Berryville

**Public Works Department** 

P.O. Box 227 305 East Madison Berryville, Arkansas 72616

June 19, 2008

Mr. Greg Hurley
Arkansas Department of Environmental Quality
Water Division Enforcement Branch
5301 Northshore Dr.
N. Little Rock, AR
72118-5317

Re: Response to John Fazio's inspection of 4/29-30/08

Permit No.: AR0021792 AFIN: 08-00034

Dear Mr. Hurley:

Sincerely,

Kirby Murray

On April 29-30, 2008 Mr. John Fazio performed a routine permit compliance inspection and compliance sampling inspection at this city's wastewater treatment facility.

The one thing he found wrong this visit was that our contract laboratory had not put their name and address on the DMR's.

This lab was contacted immediately after Mr. Fazio's visit and they have been putting this information on the DMR's ever since.

Please feel free to contact me with any comments or questions you may have.



Office of the Director, Kirby Murray

Phone: 870-423-4074 Fax: 870-423-4501

E-mail: pwdirector@hbeark.com

