

September 19, 2008

Ken Fratesi, Manager West Helena Water Utilities 92 Plaza Street West Helena, Arkansas 72390

*RE: Waste Water Facility* 

AFIN: 54-00086

NPDES Permit No.: AR0022021

Dear Mr. Fratesi:

On September 10, 2008, 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:

## Excessive vegetative growth along lagoon levee system.

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 **October 17, 2008**.

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

Ken Fratesi, Manager West Helena Water Utilities September 19, 2008 Page 2

If I can be of any assistance, please contact me at (870) 247-5183.

Sincerely,

teven L. Houderson

Steven L. Henderson District 6 Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

\$	EPA	Form Approved OMB No. 2040-0003											
	Washington, D.C. 20460 NPDES Compliance Inspection Report												
Section A: National Data System Coding													
	Transaction Code     NPDES     Yr/Mo/Day     Inspector     Fac. Type												
1	$\mathbf{N}  2  5 3  \mathbf{A}  \mathbf{R}$	$\begin{array}{c c} C \\ \hline C \\ \hline \end{array} 19 \\ \hline S \\ \hline 20 \\ \hline 1 \\ \hline \end{array}$											
	A F I N 5												
	Inspection Work Days 67 69	]	Facility Evaluation	C	BI N	72	QA N 73 74 75		Reserved				
	07 09		10 3	71					80				
				Section									
incl	ne and Location of Facility Inspected ade POTW name and NPDES permit of West Helena WWTP			scharging to POTV	V, also		Entry Time/Date 9:00 a.m. 9/10/08		Permit Effective Date <i>February 1, 2008</i>				
	of Porter Street t Helena, Arkansas						Exit Time/Date		Permit Expiration Date				
	lips County, Arkansas ion 10, Township 2 South, Range 4	East					12:00 noon 9/10/08		January 31, 2013				
Nan	ne(s) of On-Site Representative(s)/Ti			mber(s)				Oth	ner Facility Data				
	Fratesi, Water Utilities Manager rles Taylor, Class I Operator		(870) 572-6714 (870) 572-6714						34 31' 55.7"				
	ne, Address of Responsible Official/ Fratesi, Water Utilities Manager	Fitle/I	Phone and Fax Num	nber				W	90 40' 18.3"				
Wes	t Helena Water Utilities						Contacted						
	Plaza Street t Helena, Arkansas 72390						Yes 🗹 No 🗖						
			Se	ction C: Areas Ev	valuat	ed Di	uring Inspection						
					U = U	Jnsati	sfactory, $N = Not Evaluated$ )						
S	Permit	S	Flow Measurem		U	•	erations & Maintenance	S	Samping				
S	Records/Reports	S	Self-Monitoring	0	S		dge Handling/Disposal	S	Pollution Prevention				
U	Facility Site Review	N	Compliance Sch	edules	N		treatment	N	Multimedia				
S	Effluent/Receiving Waters	S	Laboratory ction D: Summary	of Findings/Com	N		rm Water ach additional sheets if necessar	N V)	Other:				
	A routine inspection was			_				-	Water and Air Pollution				
	-				-				The inspection revealed				
	e following violation:	2000		, and me reg	,		s promusaica increa	iuci	· Inc inspection revealed				
	<i>J</i>												
1.	Excessive vegetative gr	owi	th along lago	on levee sys	tem.								
	0 0		0 0	·									
Nar	ne(s) and Signature(s) of Inspector(s	)		Agency/Office/	Telep	hone/	Fax		Date				
							247-5183/ (870) 247-5185		September 19, 2008				
	Steven L. H	inuel	5011										
Sig	Signature of Reviewer Agency/Office/Phone and Fax Numbers								Date				

I

Permit #: AR0022021

1

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	🗹 S 🗆 M 🗇 U 🗆 NA 🗇 NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	Øy 🛛 n 🖓 na 🖓 ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	ØS □M □U □NA □NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🖾na 🗇ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆m 🗇u 🖾na 🖾ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	ØS OM OU ONA ONE
2. TREATMENT UNITS PROPERLY MAINTAINED:	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: 1 Class III, 1 Class I	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

Permit #: AR0022021

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	Øy 🛛 n 🖓 na 🖓 ne
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	Øy 🛛 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:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	🗹 Y 🗆 N 🗆 NA 🗆 NE
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	Øy 🛛 n 🗆 na 🗆 ne
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 33 <sup>3</sup> / <sub>4</sub> "Rec. Weir w	$   \sqrt{o \ cont.} \qquad \qquad$
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	Øy 🛛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:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED >10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED <u>&gt;</u> 10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: McClelland Consulting Engineers, Inc.	
b. LAB ADDRESS: P.O. Box 34087, Little Rock, Arkansas 72203	
c. PARAMETERS PERFORMED: <b>BOD, pH, TSS, FCB</b>	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
C. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Øy 🛛n 🖾na 🖾ne

ADEQ Water NPDES Inspection
ADED Water NPDES Inspection

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SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS														
BASED ON VISUAL OBSERVATIONS ONLY														
DETAILS:														
OUTFALL #:	R	OTHER												
001	None	None	None	None	None	Clear	r	None						
SECTION H: SLUDGE DISPOSAL														
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS <b>IS IN U NA NE</b>														
DETAILS:														
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			<b>N</b>	sШм							
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40	) CFR 503:				s 🗆 м	DU 🗹 NA DNE						
3. FOR LAND	APPLIED SLUDGE, TY	YPE OF LAND APPLIEI	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):									
SECTION	I: SAMPLIN	<b>G INSPECTIO</b>	ON PROCEDU	JRES										
SAMPLE F	<b>RESULTS WITH</b>	HIN PERMIT R	EQUIREMENT	S			мП	J □NA ØNE						
DETAILS:														
1. SAMPLES	OBTAINED THIS INSPI	ECTION:					ΠY	□n □na Øne						
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:										
3. SAMPLES														
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:					ΠY	□n □na Øne						
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	/ICE:				ΠY	□n □na Øne						
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				ΠY	🗆 n 🗆 na 🗹 ne						
7. SAMPLE S	PLIT WITH PERMITTEI	E:					ΠY	🗆 n 🗆 na 🗹 ne						
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					ΠY	🗆 n 🗆 na 🗹 ne						
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:				ΠY	□n □na Øne						
SECTION	J: STORM W	<b>WATER POLL</b>	UTION PREV	<b>VENTION PL</b>	AN									
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5	⊠s □	м Πι	J 🗆 NA 🗆 NE						
DETAILS:														
1. SWPPP UF	DATED AS NEEDED:	DATE OF LAST UP	DATE:				₽	🗆 n 🗆 na 🗆 ne						
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:				Ω̈́Υ							
3. POLLUTIO	N PREVENTION TEAM	I IDENTIFIED:					Ω̈́Υ							
4. POLLUTIO	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:													
5. LIST OF PC	5. LIST OF POTENTIAL POLLUTANT SOURCES:													
6. LIST OF PC	6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:													
7. ALL NON-S	7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:													
8. LIST OF ST	8. LIST OF STRUCTURAL BMPS:													
9. LIST OF NO	9. LIST OF NON-STRUCTURAL BMPS:													
10. BMPS PRC	10. BMPS PROPERLY OPERATED AND MAINTAINED:													
11. INSPECTIC	1. INSPECTIONS CONDUCTED AS REQUIRED:													

ADEQ Water NPDES Inspection

Permit #: AR0022021

FLOW CALCULATION SHEET											
* Due to recent heavy rainfall, the effluent weir at Pond #5 was flooded.											
Therefore, a flow calculation check could not be conducted.											
Date: 9/1	0/08	Time:	10-	45 a.m.							
	0/00	11110.	10.	<del>1</del> 5 a.m.							
Head in Inc	hes:	F	eet:								
	Type & Size of Primary Flow Measurement Device: 33 <sup>3</sup> / <sub>4</sub> " Rectangular Weir w/o contractions										
33 /4 Ret	langulai W		iliac	10115							
Name & Mo	odel of Seco	ndary Flow	Mea	surement	Devi	ce:					
Polysonic	– Poly Lev	el ER 591				·					
Date of last	Calibration	of Seconda	ary FI	ow Device	: <i>D</i> e	cember	9, 200	)7			
Recorded F	Flow at Date	& Time Lis	ted A	bove:				(Facility Flow Meter)			
	Flow at Dat						th				
(Flow is calcula	ted using flow ch	arts in: <u>ISCO O</u>	pen Ch	nannel Flow Me	easure	ment Handl	<u>000k-5<sup>m</sup></u>	Edition)			
	Recorded	Value -	Calc	ulated Val	ue	V 400					
% Error =		Calculated	lated Value			- X 100					
	1						-				
% Error =		-				X 100					
0/ Error		V 1	00								
% Error =		X 1	00								
% Error =		X 1	00								
% Error =	% Error = %										
Comments											

ADEQ Water NPDES Inspection			l: <b>54-00086</b>		Pe	rmit #: AR002					
DMR Calculation Check											
<b>Reporting Period:</b>	From _	2008 Year	07 Month	01 Day	_ To	2008 Year	07 Month	<u>31</u> Day			
Parameter Checked:	]	BOD5	_								
Loading Mass					<b>Concentration</b> <b>Monthly</b>						
	Mo. A	Avg lbs/	/day	Mo. A	<b>vg</b>	mg/l	7-day Avg	g mg/l			
<b>Reported Value:</b>	Reported Value:   248			23			26.2				
Calculated Value:	Calculated Value: 248			23			26.2				
Permit Value: 250.2					25		40				

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

WEST HELENA WATER UTILITIES 92 PLAZA WEST HELENA, ARKANSAS 72390 PHONE 870-572-6714 KEN FRATESI MANAGER

**OCTOBER 17, 2008** 

AFIN# 54-00086

AR0022021

TO: WATER DIVISION ENFORCEMENT SECTION ADEQ 5301 NORTHSHORE DRIVE NORTH LITTLE ROCK, AR. 72118-5317

FROM: KEN FRATESI WEST HELENA WATER UTILITIES 92 PLAZA WEST HELENA, AR. AR0022021 72390

RE: INSPECTION RESPONSE

THE CONTRACTED MOWER STARTED MOWING THE EVENING OF SEPTEMBER 10, 2008 AND FINISHED SEPTEMBER 12, 2008

THANK-YOU

Ken Jules

KEN FRATESI

adequates



November 12, 2008

Ken Fratesi, Manager West Helena Water Utilities 92 Plaza West Helena, AR 72390

## RE: NPDES Permit AR0022021, AFIN 54-00086 Response to Inspection

Dear Mr. Fratesi:

ADEQ has received your response to the September 10, 2008 compliance inspection of your facility by our District Field Inspector, Steven Henderson. Your letter appears to adequately address the problem identified during the visit.

The Department will keep the inspection and response on file and will consider them as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires ADEQ to consider the past history of your company and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any violations.

Thank you for your attention to this matter. If we need further information, we will contact you. Should you have any questions, feel free to contact me by phone at 501-682-0632 or e-mail at <u>robertsa@adeq.state.ar.us</u>. In any written correspondence to this Department, please refer to NPDES Permit AR0022021 and AFIN 54-00086.

Sincerely,

Anne Roberts Enforcement Administrator Enforcement Branch Water Division



November 4, 2008

Ken Fratesi West Helena Water Utilities 92 Plaza Street West Helena, AR 72390

## RE: NPDES Permit AR0022021, AFIN 54-00086 Response to Inspection

Dear Mr. Fratesi:

ADEQ has received your response to the recent inspection of your facility by our District Field Inspector, Steven Henderson. Your letter appears to adequately address the discrepancies identified during the visit.

ADEQ will keep the inspection and response on file. We will consider the inspection and response as required by Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires ADEQ to consider the past compliance history of your company and how expeditiously the violations were addressed, in determining any civil penalty that may be necessary for any violations.

If we need further information, we will contact you.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me by phone at 501-682-0823 or e-mail at <u>keller@adeq.state.ar.us</u>.

Sincerely,

Dan Ket

Dawn Keller Enforcement Administrator Water Enforcement Section