

To: City of Sheridan file, NPDES Permit AR0034347

From: Dennis Benson, Inspector

Subject: Compliance Assistance, Requirements of Modified Permit

Date: October 10, 2008

On October 10, 2008, I met with David Fitzgerald, Superintendent for the Sheridan Water and Wastewater to discuss the requirements in his newly modified permit and how best to address the new requirements in the modified permit. The following items were discussed and recommendations were made:

1. The newly issued permit requires lead (Pb) to be sampled once a month by grab sample on the effluent and reported on a monthly DMR. The permit also requires Table III metals (which includes lead) to be sampled once a month by 24-hour composite sample on the influent and effluent for a period of one year. Mr. Fitzgerald wanted to know if he had to sample both ways (grab sample and 24-hour composite) for lead. **RECOMMENDATION** – Mr. Fitzgerald was advised to contact Mr. Chris Roberts with the permit's branch to see if he could get permission to report on his DMR the 24-hour composite lead sample instead of the grab sample for a period of one year. After that, sampling for lead should return to grab sample. He was advised to get the clarification in writing.
2. The DMRs issued for the new permit list a minimum stream flow value of 6.5 mgd and requires the stream to be monitored continuously. The 6.5 mgd is the minimum stream flow when the City of Sheridan can discharge, however, if Mr. Fitzgerald monitors the stream continuously for a full month and the flow is less than 6.5 mgd, it will appear as a violation even if he did not discharge during the month. I discussed this with the permits branch and they stated that it should be when the facility is discharging. **RECOMMENDATION** – The permits branch was asked to do a minor modification to the permit to change the frequency of analysis to "continuous when discharging". Mr. Fitzgerald was contacted and told to discuss this with Mr. Roberts.
3. The permit requires a background sample once every 2 months. Mr. Fitzgerald was seeking advice on where to collect his background samples. **RECOMMENDATION** – We discussed the need to get an accurate background reading to help determine the metals loading to his facility. It was recommended that Mr. Fitzgerald collect half of his background samples from the older more established neighborhoods and half from the newer developments in town. The older neighborhoods tend to have higher metals levels than newer neighborhoods due to the changing materials used in the plumbing profession. Again, we advised Mr. Fitzgerald to discuss this issue with Mr. Roberts or Mr. Gilliam with Pretreatment.
4. Part III of the permit requires the permittee to use the form contained in Part III to report his influent, effluent and background samples. This form does not have enough room to report all 12 influent and effluent samples and has no

location to report his background samples. **RECOMMENDATION** – Mr. Fitzgerald was advised to contact the permit's branch to discuss how to report. It appears the form was set up for reporting 4 quarterly samples instead of 12 monthly samples. It is possible the Permit's Branch wants him to average the 3 samples collected during the quarter and report a quarterly average, or it is possible that the form needs to be used multiple times.

5. Mr. Fitzgerald operates a hydrographically controlled release facility and sometimes may go months without a discharge flow. Mr. Fitzgerald wanted to know if he had to collect the influent sample and the background samples, if he has no discharge. The permit's branch indicated that he must collect the influent and background samples even if not discharging. Mr. Fitzgerald was also concerned that 12 effluent samples are required and that he would be collecting additional effluent samples after one year. I told Mr. Fitzgerald the permit clearly stated the monitoring and reporting requirement contained in Part III, 7.c was for a period of one (1) year from the effective date of the permit. If the permit's branch had wanted 12 effluent samples, the language in Part III would have stated 12 monthly samples rather than a period of one year from the effective date of the permit.

6. Reporting units for metals was also discussed with Mr. Fitzgerald. The permit in Part I requires the reporting of lead on the DMR to be µg/l and the MQLs in Part III are in µg/l. However, the form in Part III that Mr. Fitzgerald is required to complete and submit wants the results in mg/l. Mr. Fitzgerald's laboratory is reporting the first lead sample results in mg/l. **RECOMMENDATION** – Mr. Fitzgerald was advised to have his contract laboratory report metals results in µg/l and to contact the permit's branch about the reporting issues relative to the form contained in Part III of the permit.

7. Compliance schedule dates were determined and given to Mr. Fitzgerald. They are as follows:

- a. **February 1, 2009 – Complete the file review required to determine what the actual engineering design of the facility.**
- b. **March 1, 2009 – Submit a report on the file review.**
- c. **August 1, 2009 – Complete the engineering study.**
- d. **September 1, 2009 – Submit the completed engineering study.**



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

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

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R 0 0 3 4 3 4 7 11 12 0 8 1 0 1 0 17 18 H 19 S 20 1					
Remarks					
A F I N 2 7 - 0 0 0 2 2 G R A N T C O U N T Y					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N 72 N 73	74 75	80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Sheridan, City of - Take I-530 South toward Pine Bluff and take the Highway 167 ext toward Sheridan. Once in Sheridan, turn left (east) on Highway 270 and go approximately 8 blocks to Gatzke Drive (turn right). Plant is at end of drive.	Entry Time/Date 09:30 am on 10/10/08	Permit Effective Date 03/01/05
	Exit Time/Date 11:00 am on 10/10/08	Permit Expiration Date 2/28/2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) David Fitzgerald Superintendent 870-942-2722	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number David Fitzgerald PO Box 44 Sheridan, AR 72150-0000 870-942-6048	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

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

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

Met with David Fitzgerald to discuss how to comply with the new requirements in the modified permit. See memo for specifics of what was discussed.

Name(s) and Signature(s) of Inspector(s) Dennis Benson	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality- (501) 683-0827/(501) 682-0910 (Fax)	Date 10/10/08
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date