

October 14, 2009

Ms. Catherine Cook / City Manager City of Hope POTW PO Box 667 Hope, AR 71801

RE: Compliance Inspection

AFIN: 29-00034 NPDES Permit No.: AR0038466

Dear Ms. Cook:

On September 23, 2009, 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:

Part II, Section B, 6 (Removed Substances) of the Permit states "Solids, sludges, filter backwashes, or other pollutants removed in the course of treatment or control of waste waters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the waters of the State." Your facility had not properly disposed of the waste materials from the sand blasting operations in the clarifiers.

The above item requires your immediate attention. Please submit a written response to this finding to Cindy Garner, Enforcement Branch Manager, of the Water Division of this Department.

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 October 24, 2009.

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 870-777-7585 ext. 2 or smithron @adeq.state.ar.us.

Sincerely,

Red Smith District 10 Field Inspector Water Division

cc: Water Division Enforcement Branch

Ruf Sith

Water Division Permits Branch

ADEQ Water NPDES Inspection	AFIN: 29-00034	Permit #: AR0038466

3	EPA .	Form Approved OMB No. 2040-0003							
	NPDE								
			•	Section A: Nation	nal Data	System Coding			
1	Transaction Code								
					Remarks				
	Inspection Work Days 67 69 69		Facility Evaluation R	tating 71	BI N 7	QA2 N 73 74 75	1	Reserved	
				Section I	3: Facili	y Data			
incl	ne and Location of Facility Inspected and POTW name and NPDES permits of Hope POTW			charging to POTW	V, also	Entry Time/Date 1030 / 9-23-09		Permit Effective Date October 1, 2007	
	lles west of Hope & 1 mile south o	f Hwy	67			Exit Time/Date 1545 / 9-23-09		Permit Expiration Date September 30, 2012	
	ne(s) of On-Site Representative(s)/Tn Holston / WW Superintendent /			nber(s)			Oth	ner Facility Data	
Cat City PO	ne, Address of Responsible Official herine Cook / City Manager / 870 v Of Hope Box 667 be, AR 71801			oer		Contacted Yes No No			
						During Inspection atisfactory, N = Not Evaluated)			
S	Permit	S	Flow Measureme			Operations & Maintenance	S	Sampling	
S	Records/Reports	S	Self-Monitoring I	Program	S	ludge Handling/Disposal	N	Pollution Prevention	
S	Facility Site Review	N	Compliance Sche	dules	S	Pretreatment	N	Multimedia	
S	Effluent/Receiving Waters	S	Laboratory		N S	torm Water	S	Other: Effluent Limits	
		Se	ction D: Summary	of Findings/Com	ments (A	Attach additional sheets if necessar	ry)		
Violations: Contaminated waste materials (i.e. sand, metal flakes, rust and sludge) from the sand blasting operation of the inside of the clarifiers were improperly disposed of.									
Name(s) and Signature(s) of Inspector(s) Agency/Office/Telepho AR Dept. of Environm					ıvironm	ental Quality / Hope	Date		
Red	Smith /- 7 51-)			870-777-7585 e	ext. 2 / 87	70-777-7560 (fax)		October 9, 2009	
c:	· · · · · · · ·			1000	/DI	I.E. N. I		D :	
Sig	nature of Reviewer			Agency/Office	Phone a	nd Fax Numbers		Date	

ADEQ Water NPDES Inspection	AFIN: 29-00034	Permit #: AR0038466

SECTION A: PERMIT VERIFICATION	•
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	⊠S □M □U □NA □NE
DETAILS:	
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:	Øy □n □na □ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
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:	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:	Øy □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: Contaminated sand from sand blasting of the clarifiers was improperly dispose	ed of.
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 ☐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:	Øy □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

ADEQ Water NPDES Inspection	AFIN: 29-00034	Permit #: AR0038466

SI	ECTION D: SAMPLING	
PE	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
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	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
SI	ECTION E: FLOW MEASUREMENT	
PE	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:	⊠Y □N □NA □NE
2.	TYPE OF DEVICE: 24 Inch rectangular Weir without End Constrictions FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	MY □N □NA □NE
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	Øy □n □na □ne
4.	CALIBRATION FREQUENCY ADEQUATE:	☑Y □N □NA □NE
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	MY ON ONA ONE
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:	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:	MY ON ONA ONE
SI	ECTION F: LABORATORY	
	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DE	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:	Øy □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:	Øy □n □na □ne
a	a. LAB NAME: Sorrells Research	
b	b. LAB ADDRESS: 8002 Stanton Road Little Rock, AR 72201	
c	: PARAMETERS PERFORMED: <u>Bio-monitoring, Thallium, Zinc</u>	
8.	BIOMONITORING PROCEDURES ADEQUATE:	☑Y □N □NA □NE
a	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
c	I. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☑Y □N □NA □NE

ADEQ Water NPDES Inspection	AFIN: 29-00034	Permit #: AR0038466

SECTION	G: EFFLUEI	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS						
	N VISUAL OBS			OBOLITATIO		М S □м □	JU □NA □NE				
DETAILS:	11 1100/12 020		J.112.1				do Linx Linz				
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER				
001	None	None	None	None	None	Clear	NA				
	- None	110110	None	110.10	110110	Giodi	10.7				
SECTION	SECTION H: SLUDGE DISPOSAL										
SLUDGE	М ѕ Пм Г	JU □NA □NE									
DETAILS:	3101 001 KE 111E1										
	MANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □	M □U □NA □NE				
2. SLUDGE I	RECORDS MAINTAINED	O AS REQUIRED BY 40	0 CFR 503:				M □U □NA □NE				
3. FOR LANI	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE):						
SECTION	II: SAMPLIN	G INSPECTION	ON PROCED	URES							
SAMPLE	RESULTS WITH	IIN PERMIT R	EQUIREMENT	ΓS		□s □м [JU □NA ☑NE				
DETAILS:					•						
1. SAMPLES	OBTAINED THIS INSPE	ECTION:					Y ON ONA MINE				
2. TYPE OF	SAMPLE: GRAB:	□COMPOSITE: N	METHOD: FREQUE	ENCY:							
3. SAMPLES	PRESERVED:						Y 🗆 N 🗆 NA 🗹 NE				
4. FLOW PR	OPORTIONED SAMPLE	S OBTAINED:					Y □N □NA ☑NE				
5. SAMPLE	OBTAINED FROM FACIL	LITY'S SAMPLING DE	/ICE:				Y □N □NA ☑NE				
6. SAMPLE	REPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				Y □N □NA ☑NE				
7. SAMPLE S	SPLIT WITH PERMITTER	E:					Y □N □NA ☑NE				
8. CHAIN-OF	-CUSTODY PROCEDUI	RES EMPLOYED:					Y □N □NA ☑NE				
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:				Y □N □NA ☑NE				
SECTION	J: STORM V	VATER POLI	LUTION PRE	VENTION PLA	AN						
STORM V	/ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	3	⊠s □m □	JU □NA □NE				
DETAILS:											
1. SWPPP U	PDATED AS NEEDED:_	_ DATE OF LAST UP	DATE:			Ø	Y ON ONA ONE				
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:			☑	Y ON ONA ONE				
3. POLLUTIO	3. POLLUTION PREVENTION TEAM IDENTIFIED:										
4. POLLUTIO	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:										
5. LIST OF P	5. LIST OF POTENTIAL POLLUTANT SOURCES:										
6. LIST OF P	6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:										
7. ALL NON-	7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:										
8. LIST OF S	8. LIST OF STRUCTURAL BMPS: ### DY IN INA INE										
9. LIST OF N	ON-STRUCTURAL BMF	PS:					Y ON ONA ONE				
	OPERLY OPERATED AN						Y ON ONA ONE				
11. INSPECTI	ONS CONDUCTED AS I	REQUIRED:					Y ON ONA ONE				

FLOW CALCULATION SHEET								
Date:	9-23-09		Time: 1135	5				
Date.	0 20 00		11110: 1100					
Head in	Inches:	6.0	Feet:	.50				
			_					
			ow Measureme	ent Device:	24 Inch R	ectang	jular We	eir without
End Co	nstrictions	3						
NI C) NAl - l - 4	. 0				0.00	NO EN	14.004
Name &	k iviodei ot	Second	ary Flow Meas	surement D	evice: PR	0 501	NIC FMI	VI 861
Date of	last Calib	ration of	Secondary Flo	w Device:	January 6	2009		
Date of	last Sans	ration or	Cocordary 1 ic	511 DOVIGO .	ourradiy o,			
Record	ed Flow a	t Date &	Time Listed Al	bove: 1.6	2 MGD		(Facility F	Flow Meter)
				,			, , , , , , , , , , , , , , , , , , , ,	
			Time Listed A		522			
(Flow is ca	alculated using	flow charts	in: ISCO Open Cha	annel Flow Mea	surement Hand	book-5 th	Edition)	
		1.62	-	1.522				
% Error	· =	1.02		1.522				
			1.022					
0/ E mor			-		V 100			
% Error	=				X 100			
	-							
% Error	· _	.098	X 100					
		1.522						
0/ E man	_	0642	V 100					
% Error	=	.0643	X 100					
% Error	· =	6.44	%					
70 E1101		<u> </u>						
Comme	ents:							
	L							

DMR Calculation Check

Reporting Period: From 09 05 01 To 09 05 31

Year Month Day Year Month Day

Parameter Checked: CBOD5

	Loading Mass	Concentration Monthly			
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l		
Reported Value:	31.5	2.4	3.4		
Calculated Value:	31.5	2.4	3.4		
Permit Value:	100.1	10	15		

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

Water Division NPDES Photographic Evidence Sheet									
Location: AR0038466									
Photographe	er:	Red Smith			Witness:	None			
Photo #	1	Of		1	Date:	9-23-09	Time:		
Description:	Waste materials from sand blasting of the clarifiers. Approximately 20 cubic yards.								



Photographer:		****PHOTOGRAPHER NAME****			Witness: None			
Photo #	2	Of			Date:		Time:	
Description	•							

ADEQ Water NPDES Inspection	AFIN: 29-00034	Permit #: AR0038466

City of Hope

P. O. Box 667 • Hope, Arkansas 71802-0667 • (870) 777-6701 • Fax (870) 722-2579

October 22, 2009

Cindy Garner
Enforcement Branch Manager
Water Division
ADEQ
5301 Northshore Drive

North Little Rock, AR 72118

Re:

Compliance Inspection

NPDES Permit No.: AR0038466

AFIN: 29-00034

Dear Ms. Garner:

This letter is a revision to the October 21, 2009 letter. I apologize for the inaccuracy in the first letter.

During the recent compliance inspection completed on September 23, 2009 by Red Smith, District 10 Field Inspector, Water Division, Mr. Smith reported one violation:

Part II, Section B, 6 (Removed Substances) of the Permit states "Solids, sludges, filter backwashes, or other pollutants removed in the course of treatment or control of waste waters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the waters of the State." Waste materials (sand) from sandblasting operations at our wastewater tank painting were not properly disposed of.

A contractor had not properly disposed of waste sand subsequent to sandblasting at our West Wastewater Treatment Plant tanks, during our tank repainting project. This material has been removed to the City of Hope Solid Waste Management Facility per the requirements of our permit. Future contracts for tank painting will include provisions for proper disposal of the waste sand by the contractor.

TOTAL LELIGIBLE TO LES CONVERSES T

Education of the Second Section 18 to 1805.

or in model and process to department \$5, 2 in the second of 14 million

Please feel free to contact me if you require further information.

GARRIO, THE SELECT REPORTS THE RESIDENCE

Sincerely,

Catherine Cook

City Manager

Hope, Arkansas

City of Hope PO Box 667 Hope AR 71802-0667



Cindy Garner
Enforcement Branch Manager
Water Division
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118-5317



November 24, 2009

Catherine Cook City of Hope POTW P.O. Box 667 Hope, AR 71802-0667

RE: City of Hope POTW, NPDES Permit No. AR0038466, Response to Inspection

Dear Ms. Cook:

The Department has received your response to the September 23, 2009 inspection of your site by our District Field Inspector, Red Smith. Your letter appears to adequately address the discrepancies identified during the visit. The Department assumes the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department 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 future violations.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0633 or you may e-mail me at schluterman@adeq.state.ar.us.

Sincerely,

Amy Schluterman

Enforcement Analyst

Any Schluterman

Water Division Enforcement Branch