

May 25, 2010

Mr. Larry Waldrop El Dorado Water-South Plant P.O. Box 1587 El Dorado, AR 71731

RE: Compliance Inspection

AFIN: 70-00341 NPDES Permit No.: AR0033723

Dear Mr. Waldrop:

On 5/12/2010, I performed a routine compliance inspection of the El Dorado Water-South Plant 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 several thermometers which had not been calibrated in over a year.

2. The sample tube on the composite sampler had excessive solids build up.

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Branch Manager, of the Water Division Enforcement Branch of this Department. This response should be mailed to the address below. 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 with all necessary detailed documentation (i.e. pictures) is due by June 07, 2010.

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

If I can be of any assistance, please contact me at 870-862-0680.

Sincerely,

John W. fauf

John W. Lamb District 8 Field Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch AFIN: «AFIN»

≎EPA	Form Approved OMB No. 2040-0003								
UNITED STATES ENVIRONM									
NPDES Complianc									
-	Section A: Nation		•						
Transaction Code NPDES 1 N 2 5 3 A R 0 0 3 3 7	c. TypeInspectorFac. TypeC19S201								
Inspection Work Days Facility Evaluation R 67 69 70 2	Reserved 80								
	Section B	8: Facility	Data	1					
Name and Location of Facility Inspected (For industrial users disc include POTW name and NPDES permit number) El Dorado Water-South Plant	harging to POTW	, also	Entry Time/Date 10:25 5/12/2010	Permit Effective Date 10/1/2008					
325 Quail Crossing El Dorado, AR			Exit Time/Date 15:39 5/12/2010		Permit Expiration Date 9/30/2013				
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Num Harold Baker, Treatment Superintendent/870-862-6451	uber(s)			Othe	Other Facility Data				
Name, Address of Responsible Official/Title/Phone and Fax Numb Larry Waldrop, 870-862-6451 El Dorado Water-South Plant P.O. Box 1587 El Dorado, AR 71731									
	tion C: Areas Evangues, M = Marginal,		uring Inspection isfactory, N = Not Evaluated)						
S Permit S Flow Measurement	nt	S Op	erations & Maintenance	U	U Sampling				
S Records/Reports S Self-Monitoring F	Program	S Sh	ıdge Handling/Disposal	Ν					
S Facility Site Review N Compliance Sche	dules		etreatment	N					
S Effluent/Receiving Waters U Laboratory Section D: Summary	of Findings/Com		orm Water tach additional sheets if necessary	v)	Other:				
<u>Section D, item 6:</u> The sample tube in the composite sampler had excessive solids in it. <u>Section E</u> : The facility does not have a primary flow measuring device installed. This was the way it was permitted. The facility using a totalizing meter. All effluent is pumped from the last pond to the DAF units, therefore the flow meter is compared to daily pumping. <u>Section F, item 1:</u> The facility does not distill NH3-N samples, comparable data is on file. <u>Section F, item 3:</u> The facility had several thermometers which were in need of calibration.									
Name(s) and Signature(s) of Inspector(s)		Date							
John W. Lamb	nvironmental Quality Dorado, AR 71730 52-3509		24 May 2010						
Joint (C. Laint			* * *						
Signature of Reviewer Agency/Office/Phone and Fax Numbers Date									

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AFIN: «AFIN»

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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:	Øy ⊡n ⊡na ⊡ne
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	
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:	Øy 🗆n 🗆na 🗇ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	Øy 🗆n 🗆na 🗇ne
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	Øs 🖙 🗇 🖓 na 🕬
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🖙 🗇 🖓 na 🕬
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 🗅m 🗇u 🗇na 🗇ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	🗹 s 🗆 m 🗇 u 🗆 na 🗇 ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆m 🗇u 🖾na 🖾ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗅m 🗇u 🗇na 🗇ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗅m 🗇u 🗇na 🗇ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	Øs 🗅m 🗇u 🗇na 🗇ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs 🗅m 🗇u 🗇na 🗇ne
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:	

SECTION D: SAMPLING					
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	□S □M ØU □NA □NE				
DETAILS: see page 3	·				
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:					
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	Øy 🛛 n 🖓 na 🖓 ne				
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	Øy 🛛 n 🖓 na 🖓 ne				
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:					
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	🗹 Y 🗆 N 🗆 NA 🔍 NE				
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	DY 🗹 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:					
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					
DETAILS: see page 3					
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE:					
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:					
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:					
4. CALIBRATION FREQUENCY ADEQUATE:					
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:					
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:					
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	□s □m ∅u □na □ne				
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 ≥10% OF THE TIME:					
7. COMMERCIAL LABORATORY USED:					
a. LAB NAME: <u>American Interplex.</u>					
b. LAB ADDRESS: Little Rock					
c. PARAMETERS PERFORMED: BOD, metals, Bio-monitoring					
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:					

ADEQ Water NPDES Inspection
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SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS											
BASED ON VISUAL OBSERVATIONS ONLY								J 🗆 NA 🗆 NE			
DETAILS:											
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLO	R	OTHER			
001	None	None	Mod	None	None	Light gr	een				
SECTION	H: SLUDGE	DISPOSAL									
SLUDGE D	DISPOSAL ME	ETS PERMIT R	EQUIREMEN	rs		⊠s □	м Πι	J 🗆 NA 🗆 NE			
DETAILS:											
1. SLUDGE N	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			N	sШм				
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40) CFR 503:			N	s 🗆 м				
3. FOR LAND	APPLIED SLUDGE, TY	YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):						
SECTION	I: SAMPLIN	G INSPECTIO	ON PROCEDU	JRES							
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		🗆 s 🗆	м Πι	J ⊠NA □NE			
DETAILS:											
1. SAMPLES	OBTAINED THIS INSPI	ECTION:					ΠY	🗹 n 🗆 na 🗆 ne			
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:							
3. SAMPLES											
4. FLOW PRO	4. FLOW PROPORTIONED SAMPLES OBTAINED:										
5. SAMPLE O	5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:										
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	9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:										
SECTION	J: STORM W	VATER POLL	UTION PREV	/ENTION PL	AN						
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			м 🗆	J □NA ØNE			
DETAILS:											
1. SWPPP UF	PDATED AS NEEDED:	DATE OF LAST UP	DATE:				ΠY	🗆 n 🗆 na 🗹 ne			
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:				ΠY	□n □na Øne			
3. POLLUTIO	N PREVENTION TEAM	I IDENTIFIED:					ΠY	⊡n ⊡na Øne			
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:											
5. LIST OF POTENTIAL POLLUTANT SOURCES:								🗆 n 🗆 na 🗹 ne			
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:								🗆 n 🗆 na 🗹 ne			
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:								□n □na Øne			
8. LIST OF ST	RUCTURAL BMPS:						ΠY	⊡n ⊡na Øne			
9. LIST OF NO	ON-STRUCTURAL BMF	PS:					ΠY	On Ona Øne			
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:					ΠY	🗆 n 🗆 na 🗹 ne			
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:					ΠY	🗆 n 🗆 na 🗹 ne			

ADEQ Water NPDES I	Inspection AFIN: «AFIN»								
DMR Calculation Check									
Reporting Period:	From _	2010 Year	March Month	01 Day	_ To	2010 Year	March Month	<u>31</u> Day	
Parameter Checked: TSS									
Loading Mass					Concentration Monthly				
Mo. Avg lbs/day				Mo. Avg mg/l			7-day Avg mg/l		
Reported Value:		167.8		13.1		17.5			
Calculated Value:	167.8			13.1			17.5		
Permit Value: 1751					30		45		

If calculated value does not equal reported value, explain:

<u>equal</u>

June 7, 2010

Ms. Cindy Garner Branch Manager Water Division Enforcement Branch Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

RE: Compliance Inspection & Sanitary Sewer Overflow Inspection

AFIN: 70-00341 NPDES Permit No.: AR0033723

Dear Ms. Garner:

In reference to the above mentioned compliance inspection and sanitary sewer overflow inspection performed by Mr. John Lamb on 5/12/2010, please be advised of the following:

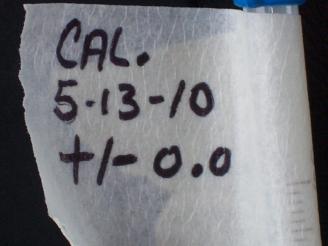
- 1. All of the thermometers at all utility facilities were calibrated on May 13, 2010 and labeled. This calibration will be repeated no less than annually and relabled each time they are calibrated.
- 2. All sampler tubing was replaced on May 13, 2010 and sampler technicians were directed to check at least monthly and replace as necessary.
- 3. The Softball Complex pump station (#8) and Fordville pump station (#5) required a sign with emergency contact information. These signs are currently being made by the city's street department and will be installed at these locations and all other wastewater pump stations as soon as they are available. (Installation will be complete no later than 6/11/2010.)

I have attached photos for documentation of thermometer calibration and labeling, the sampler tubing replacement and the belt guard replacement. I will email photos of the signs when they are in place.

If you have any questions or need additional information please contact me at (870) 862-6451.

Sincerely,

Larry C. Waldrop General Manager













September 9, 2010

Larry Waldrop El Dorado Water-South Plant PO Box 1587 El Dorado, AR 71731

RE: NPDES Permit No.: AR0033723 & AR0033936 Response to Inspection

AFIN: 70-00341

Dear Mr. Stewart:

The Department has received your response to the May 12, 2010 routine compliance inspections of your facility by our District Field Inspector, John Lamb. 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 site 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 501-682-0649 or you may e-mail me at sawyer@adeq.state.ar.us.

Sincerely,

Sam Sawyer **Enforcement Coordinator** Water Division Enforcement Branch