ADEQ

ARKANSAS
Department of Environmental Quality

April 27, 2011

Jonathan Buff, WWTP Manager
City of Benton
616 W. Hazel
Benton, AR 72015

AFIN: 63-00063 NPDES Permit No.: AR0036498

Dear Mr. Buff:

On April 13, 2011, Dennis Benson and 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:

1. The flow calculation check revealed a percentage difference of -23.73%. This is a violation of Part III Section C.2. of the permit. It is possible that the manual measuring device was not properly positioned.

2. You are in violation of the no exposure certification of the stormwater permit. See pictures 1-6 for examples. When the permit is reviewed it will be encouraged that you get an industrial stormwater permit due to violations of the no exposure certification.

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Enforcement Branch Manager of the Water Division of this Department to the address at the bottom of the page. This response should contain 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 May 9, 2011.

If I can be any assistance, please contact me at stoker@adeq.state.ar.us or 501-682-0657.

Sincerely,

Lindsay Stoker

Lindsay Stoker
District 9 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch
Terry McKinney, Director of Benton Utilities
1827 Dale Street
Benton, AR 72015

EPA

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

NPDES Compliance Inspection Report

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

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	Yr/Mo/Day	17	18	Inspec. Type	19	Inspector	20	Fac. Type
	N	5	AR0036498			110413			C		S		1

Remarks: **SALINE COUNTY**

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67–69	70: 4	71: N	72: N	73–80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
City of Benton POTW- Located at the south end of Hazel Street in Benton AR.

Entry Time/Date
10:00 am on 4/13/2011

Permit Effective Date
10/1/2008

Exit Time/Date
12:00 on 4/13/2011

Permit Expiration Date
9/30/2013

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Jonathan Buff, plant manager and Angela Freeman, Laboratory

Other Facility Data

Name, Address of Responsible Official/Title/Phone and Fax Number
Jonathan Buff
City of Benton
616 W. Hazel
Benton, AR 72015
(501) 776-5984

Contacted
Yes ☐ No ☑

Section C: Areas Evaluated During Inspection

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

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

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

1. **The flow calculation check revealed a percentage difference of -23.73%. This is a violation of Part III Section C.2. of the permit. It is possible that the manual measuring device was not properly positioned.**

2. **You are in violation of the no exposure certification of the stormwater permit. See pictures 1-6 for examples. When the permit is reviewed it will be encouraged that you get an industrial stormwater permit due to violations of the no exposure certification.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Lindsay Stoker **Lindsay Stoker**	**ADEQ/ North Little Rock/ 501-682-0657/ 501 682-0910 (Fax)**	4/13/2011
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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:	☑Y ☐N ☐NA ☐NE

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. 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:	☑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:	☑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:	☑Y ☐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: **equipment malfunction caused the plant to not divert flow to the eq basin**	☑Y ☐N ☐NA ☐NE
The problem has been fixed. Once noted plant staff manually diverted flow and SCADA reps fixed their issue the next day.	

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
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. 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

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:__ TYPE OF DEVICE: **36" Parshall Flume**	☑Y ☐N ☐NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: **isco ultrasonic**	☑Y ☐N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE: **twice a year**	☑Y ☐N ☐NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: **monthly checks**	☑Y ☐N ☐NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

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) :	☑Y ☐N ☐NA ☐NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐Y ☐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:	☑Y ☐N ☐NA ☐NE
a. LAB NAME: **American Interplex**	
b. LAB ADDRESS: **8600 Kanis Road Little Rock, AR 72204**	
c. PARAMETERS PERFORMED: **Total Phosphorus, N + N, Hardness**	
8. BIOMONITORING PROCEDURES ADEQUATE:	☐Y ☐N ☐NA ☑NE
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
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐Y ☐N ☐NA ☑NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	No	No	No	No	No	clear	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☐S ☐M ☐U ☐NA ☑NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS ☐S ☐M ☐U ☐NA ☑NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☐N ☐NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☐NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☐NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☐NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☐NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☐NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☐NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☐NA ☐NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS ☐S ☐M ☑U ☐NA ☐NE

DETAILS: **no exposure certification. Stormwater permit recommended next cycle**

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☐NA ☐NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☐NA ☐NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☐NA ☐NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☐NA ☐NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☐NA ☐NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☐NA ☐NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☐NA ☐NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☐NA ☐NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☐NA ☐NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☐NA ☐NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☐NA ☐NE

FLOW CALCULATION SHEET

Date: **4/13/2011** Time: **11:00**

Head in Inches: _____ Feet: **.75**

Type & Size of Primary Flow Measurement Device:
36" Parshall Flume

Name & Model of Secondary Flow Measurement Device:
Isco Ultrasonic Vantage 2210

Recorded Flow at Date & Time Listed Above: **3.77 MGD** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **4.943 MGD**
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-6th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{3.77 - 4.943}{4.943} \times 100$$

% Error = _____ X 100

% Error = _____ X 100

% Error = **-23.73** %

Comments: **It is possible the staff gauge was not properly positioned.**

DMR Calculation Check

Reporting Period: From 2011 (Year) 02 (Month) 01 (Day) **To** 2011 (Year) 02 (Month) 28 (Day)

Parameter Checked: Fecal coliform

		Concentration Monthly (#/100mL)	
		30 day geo mean	7-day geo mean
Reported Value:		10	62
Calculated Value:		10	62.14
Permit Value:		1000	2000

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period: From 2011 (Year) 02 (Month) 01 (Day) **To** 2011 (Year) 02 (Month) 28 (Day)

Parameter Checked: pH, s.u.

		Concentration Monthly Minimum	Concentration Monthly Maximum
Reported Value:		6.78	7.07
Calculated Value:		6.78	7.07
Permit Value:		6	9

If calculated value does not equal reported value, explain:

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Photographic Evidence Sheet

Location:	City of Benton							
Photographer:	Dennis Benson				**Witness:**	Lindsay Stoker		
Photo #	1	**Of**	6		**Date:**	4/13/2011	**Time:**	10:18 am
Description:	Oil spills and sludge exposed to stormwater.							

Photographer:	Dennis Benson				**Witness:**	Lindsay Stoker		
Photo #	2	**Of**	6		**Date:**	4/13/2011	**Time:**	10:19 am
Description:	Sludge not in basin; therefore, exposed to stormwater.							

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Department of Environmental Quality

Photographic Evidence Sheet

Location:	City of Benton						
Photographer:	Dennis Benson			**Witness:**	Lindsay Stoker		
Photo #	3	**Of**	6	**Date:**	4/13/2011	**Time:**	10:30 am
Description:	Exposed to stormwater.						

Photographer:	Dennis Benson			**Witness:**	Lindsay Stoker		
Photo #	4	**Of**	6	**Date:**	4/13/2011	**Time:**	10:32 am
Description:	Items exposed to stormwater.						

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Department of Environmental Quality

Photographic Evidence Sheet

Location:	City of Benton						
Photographer:	Dennis Benson			**Witness:**	Lindsay Stoker		
Photo #	5	**Of**	6	**Date:**	4/13/2011	**Time:**	10:32 am
Description:	Grease on an old pump exposed to stormwater.						

Photographer:	Dennis Benson			**Witness:**	Lindsay Stoker		
Photo #	6	**Of**	6	**Date:**	4/13/2011	**Time:**	10:32 am
Description:	Item within containment are technically not exposed to stormwater.						

BENTON UTILITIES
BENTON, ARKANSAS

May 1, 2011

ADEQ
NPDES Enforcement Section
Water Division
5301 Northshore Drive
North Little Rock, AR. 72118

RE: AFIN: 63-00063 NPDES: AR0036498

Attention: Cindy Garner, Enforcement Branch Manager

Dear Ms. Garner

This letter is a response to the routine compliance inspection performed by Dennis Benson and Lindsay Stoker, on April 13, 2011, of the City of Benton Wastewater Treatment Plant. The inspection revealed the following violations:

1. The flow calculation check revealed a percentage difference of -23.73%. This is a violation of Part III Section C.2. of the permit. It is possible that the manual measuring device was not properly positioned.

2. You are in violation of the no exposure certification of the stormwater permit. See pictures 1-6 for examples. When the permit is reviewed it will be encouraged that you get an industrial stormwater permit due to violations of the no exposure certification.

With regards to violation one above I feel, the statement by your inspectors is correct, that it was possible the manual measuring device was not properly positioned, therefore resulting in the percentage difference. The flow meter is calibrated, by Arkansas Instrument Supply Company, every 6 months and on an as needed basis. As of the inspection date, their most recent flow calibration check was January 7, 2011. Enclosed you will find a copy of the Calibration Certificate. I realize though there may be an issue with the manual measuring device being positioned properly. I have addressed this by having operators attached staff gauge directly to parshall flume, which will facilitate an easier reading of staff gauge. In addition, I had Arkansas Instrument Supply come back out May 3, 2011 to recheck flow meter, enclosed is a copy of that Calibration Certificate. Finally, all operators are being trained to perform a check of the flow meter. Operators are currently performing a monthly flow comparison between flume and meter.

The inspection report Section E: Flow Measurement reads satisfactory. However, we will continually strive to do what may be necessary so as to comply with Part III Section C.2. of the permit. See pictures 1 and 2 of photos.

With regards to violation two above, yes we were in violation of the no exposure certification of the storm water permit. This is just another issue inherited from previous manager and operator, Dennis even made mention to that fact. I conduct weekly meetings with my operators to keep communication lines open for concerns, issues, and problems that need to be discussed. The operators under my charge are now well informed about the no exposure certification and what it means in this facility and it becomes everyone's job to ensure compliance. The old drying beds will be used as a containment location for all material located outside of a building. Other discussion topics include handling spills, clean up procedures, and housekeeping, etc. Enclosed are examples that your inspector's findings have been addressed. See pictures 3 through 8 of photos.

I accepted the responsibilities as manager of this facility and will work to diligently communicate and train operators of this facility so that there will be a greater understanding of their responsibilities. I hope, I have addressed your concerns raised during this inspection and if you have further questions please contact my office 1-501-776-5982.

Sincerely,

Jonathan W. Buff

Jonathan W. Buff
Manager, Wastewater Treatment
Benton Utilities
616 Hazel Street
Benton, AR. 72015

CC: Terry McKinney, General Manager, Benton Utilities

CALIBRATION CERTIFICATE

Arkansas Instrument Service Company
6704 FAIT ROAD BENTON, AR. 72019
PHONE: 501-794-0026 FAX: 501-794-3255

COMPANY Benton, W.W.T.P	SITE Benton, AR
MANUFACTURE Eastech Badger	TAG or ID Effluent Flow Transmitter
MODEL # 2210 Vantage	SERIAL# 11460

Calibrated Range/Span

	SPAN		ENG.UNIT	% ACCURACY	+/- TOLERANCE	ENG.UNIT
INPUT	0	21.97	Inches	.5%	.110	Inches
OUTPUT	0	20.0	MGD	1%	.200	MGD
OUTPUT						

Calibration Data

AS FOUND					AS LEFT	
INPUT		OUTPUT			OUTPUT	
%	Actual ~~Ft~~ Inches Ft	Desired MGD	Actual MGD	+/- Error	Actual	+/- Error
0.0						
25.0	7.80 = 0.65	3.951	3.95	—		
50.0					SAME	
75.0	7.94 = 0.66	4.046	4.04	—		
100.0						
75.0						
50.0						
25.0						
0.0						

Measuring & Test Equipment

Type	Name	Model #	Serial #	Calb. Due Date
Published Standard - ISCO Open Channel Flow Measurement Handbook.				

Special Conditions or Comments

36" Parashall Flume (3') ft

AMBIENT TEMPERATURE:

Certification

Calibration Frequency	Calibration Date	Inspector Signature
6-Months	1-7-11	Scott Sums

This document certifies the above named equipment has been inspected and tested against the listed field standards. This document conforms to MIL-STD-1839B and ANSI/NCSL Z540-2-1997. All standards are Certified and Traceable to the National Institute of Standards & Technology.
Copies of field Standards Certifications will be supplied upon request.

CALIBRATION CERTIFICATE

Arkansas Instrument Service Company

6704 FAIT ROAD BENTON, AR. 72019

PHONE: 501-794-0026 FAX: 501-794-3255

COMPANY Benton W.W.T.P	SITE Benton, AR
MANUFACTURE Eastech Badger	TAG or ID Effluent Flow Transmitter
MODEL # 2210 Vantage	SERIAL# 114160

Calibrated Range/Span

	SPAN		ENG.UNIT	% ACCURACY	+/- TOLERANCE	ENG.UNIT
INPUT	0	21.97	Inches	.5%	.110	Inches
OUTPUT	0	20.0	MGD	1%	.200	MGD
OUTPUT						

Calibration Data

AS FOUND					AS LEFT	
INPUT		OUTPUT			OUTPUT	
%	Actual Hd.ft	Desired MGD	Actual MGD	+/- Error	Actual	+/- Error
0.0						
25.0	.92	6.807	6.81	—		
50.0						
75.0	1.00	7.756	7.76	—		
100.0						
75.0	1.04	8.247	8.25	—		
50.0						
25.0						
0.0						

SAME

Measuring & Test Equipment

Type	Name	Model #	Serial #	Calb. Due Date
Published Standard - ISCO open Channel Flow measurement handbook.				

Special Conditions or Comments

36" Parashall Flume (3' ft)

AMBIENT TEMPERATURE:

Certification

Calibration Frequency	Calibration Date	Inspector Signature
6-Months	5-3-11	Scott Rumo

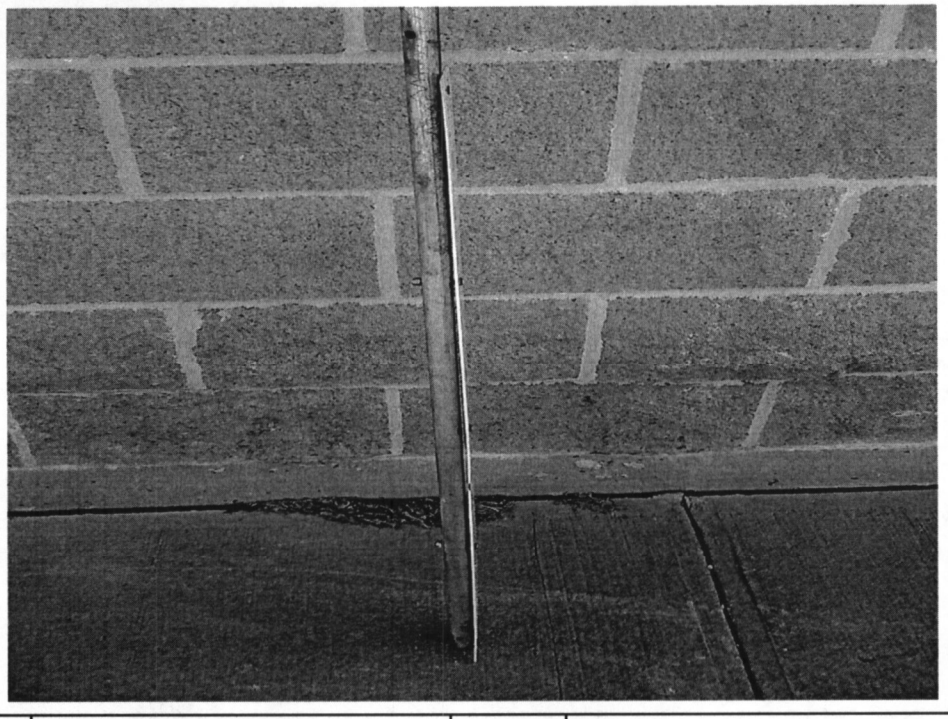
This document certifies the above named equipment has been inspected and tested against the listed field standards. This document conforms to MIL-STD-1839B and ANSI/NCSL Z540-2-1997. All standards are Certified and Traceable to the National Institute of Standards & Technology.
Copies of field Standards Certifications will be supplied upon request.

BENTON UTILITIES

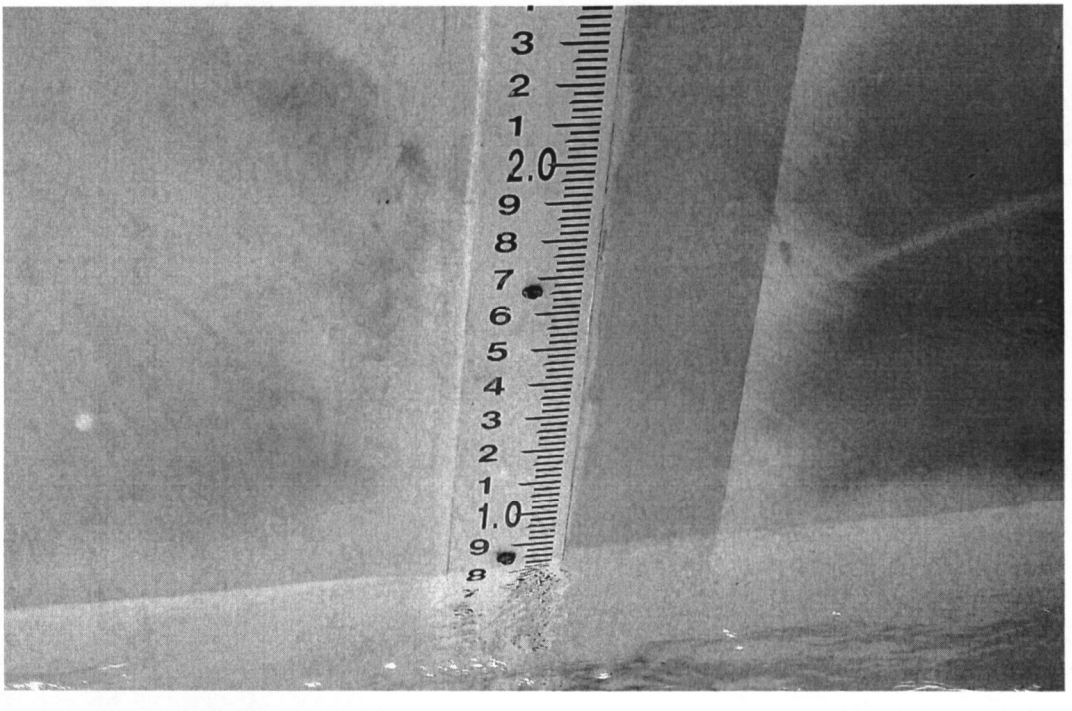
City Of Benton
Wastewater Treatment Plant

Photographic Evidence Sheet

Location:	City of Benton								
Photographer:	Steve Nelson				**Witness:**	Brian Lindsey			
Photo #	1	**Of**	8		**Date:**	4/29/2011		**Time:**	2:30 PM
Description:	Staff gauge manual device that was used for measuring flow								



Photographer:	Jonathan Buff				**Witness:**	Steve Nelson			
Photo #	2	**Of**	8		**Date:**	4/29/2011		**Time:**	12:15 PM
Description:	Staff gauge permanently attached to side of parshall flume								

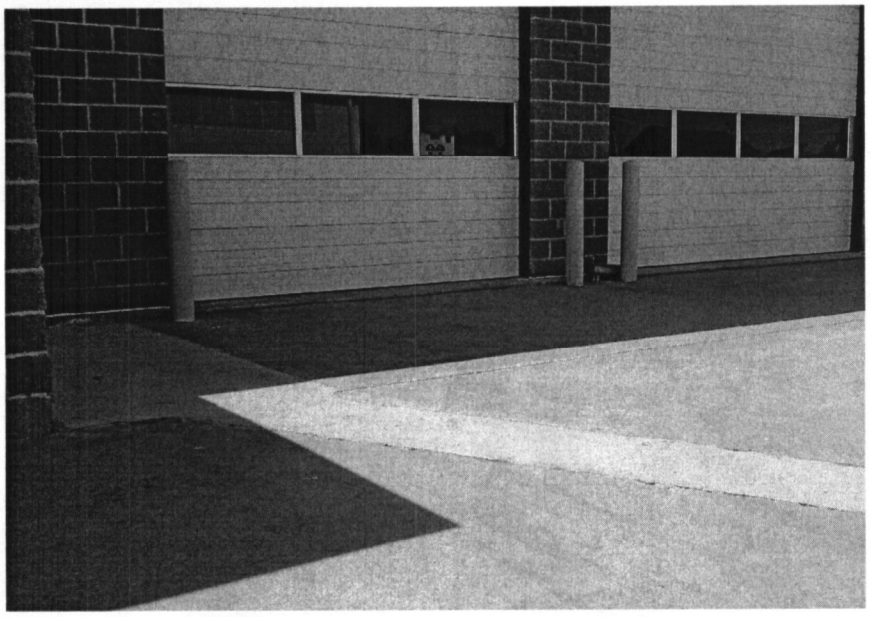


BENTON UTILITIES

City Of Benton
Wastewater Treatment Plant

Photographic Evidence Sheet

Location:	City of Benton						
Photographer:	Jonathan Buff		**Witness:**	Steve Nelson			
Photo #	3 **Of** 8		**Date:**	5/5/2011		**Time:**	12:47 PM
Description:	Oil spills and sludge cleaned		Reference inspection photo 1 of 6				



Photographer:	Jonathan Buff		**Witness:**	Steve Nelson			
Photo #	4 Of 8		**Date:**	5/5/2011		**Time:**	12:39 PM
Description:	Sludge not in basin cleaned		Reference inspection photo 2 of 6				

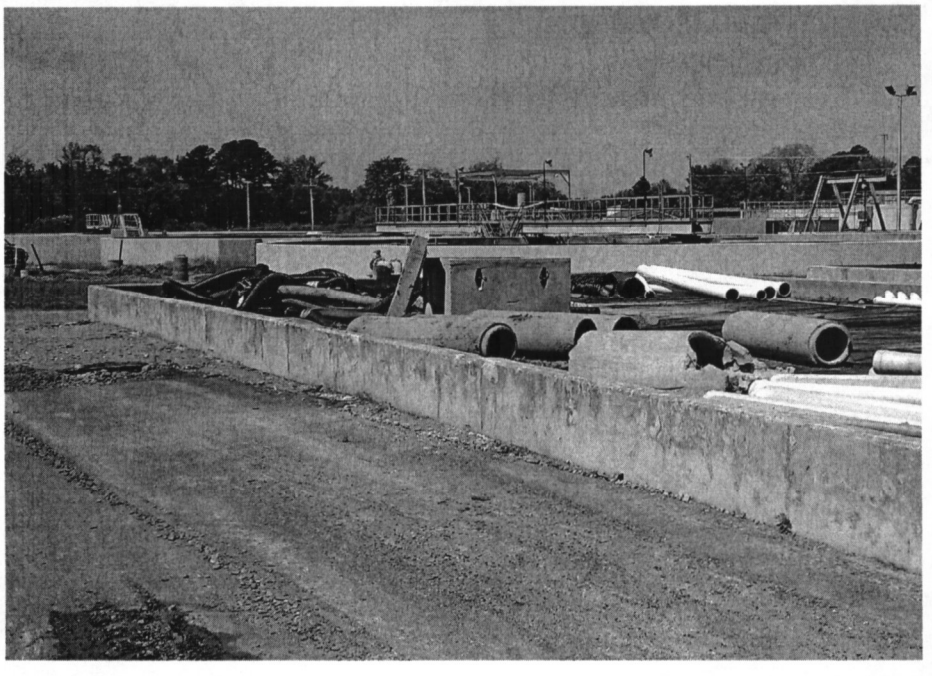
BENTON UTILITIES

City Of Benton
Wastewater Treatment Plant

Photographic Evidence Sheet

Location:	City of Benton							
Photographer:	Jonathan Buff			**Witness:**	Steve Nelson			
Photo #	5	**Of**	8	**Date:**	5/5/2011		**Time:**	11:23 AM
Description:	Items exposed removed, sold as scrap iron (see photo 7 also) Reference inspection photo 3 of 6							

Photographer:	Jonathan Buff			**Witness:**	Steve Nelson			
Photo #	6	Of	8	**Date:**	5/5/2011		**Time:**	12:45 PM
Description:	Items removed and sold as scap iron or stored in drying bed Reference inspection photo 6 of 6							



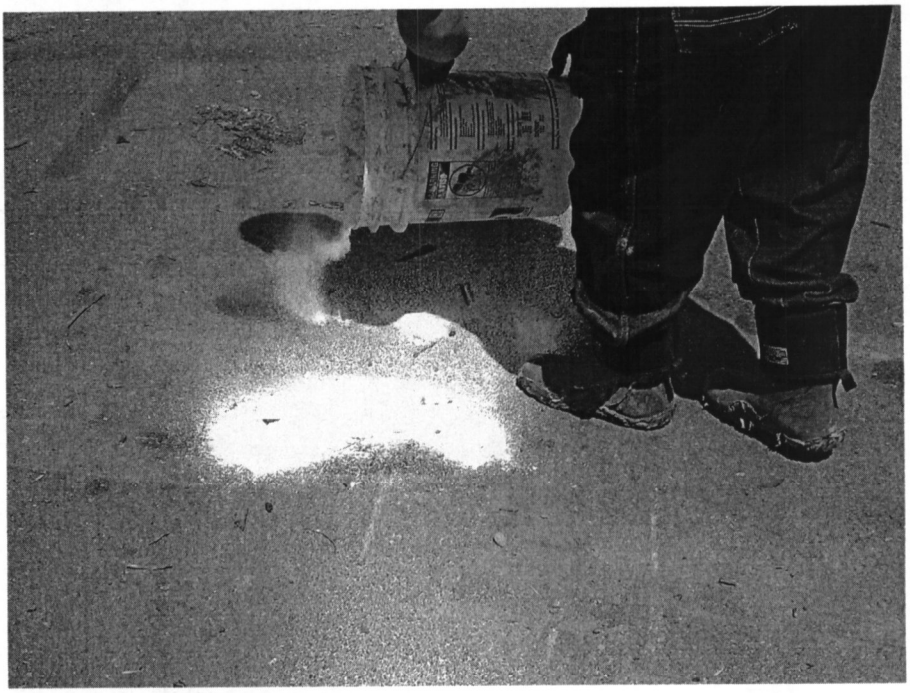
BENTON UTILITIES

City Of Benton
Wastewater Treatment Plant

Photographic Evidence Sheet

Location:	City of Benton							
Photographer:	Jonathan Buff			**Witness:**	Steve Nelson			
Photo #	7	**Of**	8	**Date:**	5/5/2011		**Time:**	11:22 AM
Description:	All pumps, pipes, and scrap that was exposed now hauled away from plant							

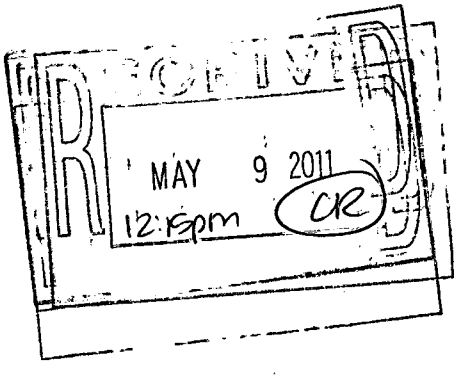
Photographer:	Jonathan Buff			**Witness:**	Steve Nelson			
Photo #	8		8	**Date:**	5/5/2011		**Time:**	12:42 PM
Description:	Oil dry being used to clean up oil spill							



ADEQ

Front Desk Hand Delivery Receipt

Documents Received:
Date:



ADEQ
ARKANSAS
Department of Environmental Quality

May 16, 2011

Mr. Jonathan Buff, WWTP Manager
City of Benton
616 W. Hazel
Benton, AR 72015

RE: AFIN: 63-00063 NPDES Permit No.: AR0036498

Dear Mr. Buff:

The Department has received your response to the April 13, 2011 inspection of your facility by our District Field Inspectors, Dennis Benson and Lindsay Stoker. Your letter appears to adequately address the discrepancies identified during the visit. The Department expects that 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 call 501-682-0631 or you may e-mail meints@adeq.state.ar.us.

Sincerely,

Rene' E. Meints

Rene' Meints
Enforcement Analyst
Water Division Enforcement Branch