

June 24, 2011

Gary Smith, Utilities Director City of Van Buren P.O. Box 1269 Van Buren, AR 72957

RE: Compliance Evaluation Inspection on City of Van Buren POTW (South Plant)

AFIN: 17-00062 NPDES Permit No.: AR0021482

Dear Mr. Smith:

On May 24, 2011, 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. After reviewing the February 9, 2011, chain of custody it did not confirm that sulfuric acid was being utilized as a preservative for the Nitrite plus Nitrate and the Phosphorous grab sample. This is violation of Part II. Section C.3 of the permit.
- 2. Excessive standing water located north of the clarifiers is limiting access to sections of the treatment unit. This water should be eliminated in an effort to ensure that proper operation and maintenance of all treatment units can be performed. This is a violation of Part II. Section B. 1 of the permit.

The above items require your immediate attention. Please submit a written response to these findings to Water Division Enforcement Branch at the address below. The response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible and the written response with all necessary documentations (i.e. picture) is due by July 4, 2011.

If I can be of any assistance, please contact me at 479-424-0325.

Sincerely,

Jeff Tyler

District 4 Field Inspector

Water Division

Cc: Water Division Enforcement Branch

Water Division Permits Branch

	ADEQ Water NPDES Inspec	tion AF	IN: 17-00062		Permit #: AR	00214	82
							Ι
•							Form Approved OMB No. 2040-0003
8	EPA						OMB 10. 2040-0003
	UNITI	ED STATES ENVIRONME	ENTAL PROTECTION AC , D.C. 20460	GENCY			
	NPDES C	· ·		on I	Report		
			ection A: National				
	Transaction Code	NPDES			Yr/Mo/Day	Insp	pec. Type Inspector Fac. Type
1	N 2 5 3 A R 0 0	0 2 1 4	8 2 11 12		1 0 5 2 4 17	18	C 19 S 20 1
Ĺ	A F I N 1	1 7 - 0	0 0 6 2	arks			
	Inspection Work Days F	acility Evaluation R	ating BI	1	QA]	Reserved
	67 0 0 0 69	70 3	71 N	72	N 73 74 75		80
			Section B: F	acility	Data		
incli	ne and Location of Facility Inspected (For ude POTW name and NPDES permit numb y of Van Buren POTW (South Plant	er)	harging to POTW, a	lso	Entry Time/Date 0915 / May 24, 2011		Permit Effective Date March 1, 2009
140	1 Port Road	<u>- </u>			Exit Time/Date		Permit Expiration Date
Van	Buren, AR 72956				1515 / May 24, 2011		February 28, 2014
	ne(s) of On-Site Representative(s)/Title(s)/						er Facility Data
	Testerman / Operator / 479-474-0941 nny Gattis / Operator / 479-474-0941 /						ordinates: cility
	ne, Address of Responsible Official/Title/F						85°25'09" 94°20'19"
	y Smith / Utilities Director / 479-474- D. Box 1269	-5067 / fax / 479-4	71-8969		Contacted	''	74 20 17
Var	Buren , AR 72957				Yes No 🗹		
		Sect	ion C: Areas Evalu	ated Di	uring Inspection		
					sfactory, N = Not Evaluated)		
S	Permit S	Flow Measuremen		- · r	erations & Maintenance	M	Sampling
S	Records/Reports S	Self-Monitoring P			dge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review S	Compliance Sched		;	etreatment	N	Multimedia
S	Effluent/Receiving Waters See	Laboratory	of Findings/Commo	510	rm Water ach additional sheets if necessar	N	Other:
	50	Cuon D. Summary	a i munigs/ comme	1113 (1111	acii additional sheets ii necessal	3)	
	Section D. 6.b- Chain of custoe plus Nitrate does not indicate					ysis (of Phosphorous and Nitrite
	•			1			
	Section C. 2- Excessive stand	0		_	-		0
	clarifiers and the return junct of all needed treatment units of			be re	ached, problems with pro	per o	peration and maintenance
	Market of Christian Miles	or emperious					
Nar	ne(s) and Signature(s) of Inspector(s)		Agency/Office/Tele		Fax ll Quality- / Fort Smith /		Date
Jeff	Tyler 977		479-424-0325 / fax				June 9, 2011

June 9, 2011

ADEQ Water NPDES Inspection	AFIN: 17-00062	Permit #: AR0021482

Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Dat	te			
SECTION A: PERMIT VERIFICATION						
PERMIT SATISFACTORILY ADDRESSES OBS	ERVATIONS	Øs	Πм	□u [□NA	□NE
DETAILS:						
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:					N DN	A □NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT	OR INCREASED DISCHARGES:				N MN	A □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESC	CRIBED IN PERMIT:				N DN	A □NE
4. ALL DISCHARGES ARE PERMITTED:				ØY □	N 🗆 N	A □NE
SECTION B: RECORDKEEPING AND RE	POPTING EVALUATION					
RECORDS AND REPORTS MAINTAINED AS F		₩s	Пм	[Пид	ΠNF
DETAILS:						
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTE	ED ON DMRS:			Øy □n	N DN	A □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUD	 E:		Øs			
a. DATES AND TIME(S) OF SAMPLING:				Øy □n		
b. EXACT LOCATION(S) OF SAMPLING:				☑Y □r		
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:				Øy □ı		
d. ANALYTICAL METHODS AND TECHNIQUES:				ØY □r		
e. RESULTS OF CALIBRATIONS:				Øy □r		
f. RESULTS OF ANALYSES:				Øy □r	N DN	A DNE
g. DATES AND TIMES OF ANALYSES:				Øy □r	N DN	A DNE
h. NAME OF PERSON(S) PERFORMING ANALYSES:				Øy 🗆	N DN	A DNE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENAN	ICE RECORDS ADEQUATE:		Øs	□м □ι	J 🗆 N	A □NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIP	PMENT MAINTENANCE AND REPAIR:		Øs	□м □ι	J 🗆 N	A DNE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUE	NT FLOW AND DAILY ANALYTICAL DATA:			Øy □ı	N 🗆 N	A □NE
SECTION C: OPERATIONS AND MAINTE	NANCE					
TREATMENT FACILITY PROPERLY OPERATE	ED AND MAINTAINED	□s	ØМ	U [□NA	□NE
DETAILS: Standing water near clarifiers is lin	niting access to sections of the treatment u	<u>ınit.</u>				
TREATMENT UNITS PROPERLY OPERATED:						
2. TREATMENT UNITS PROPERLY MAINTAINED:				ØM □		
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 PROVIDE	ED: 1-Class III and 1 Class I					
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:			⊠s			
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:						
9. STANDARD OPERATING PROCEDURES AND SCHEDULES I	ESTABLISHED:					
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL E						
11. HAVE BYPASSES/ <u>OVERFLOWS</u> OCCURRED AT THE PLANT	OR IN THE <u>COLLECTION SYSTEM</u> IN THE LAST YEAR:					
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:						
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADD						
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE T	REATMENT PLANT:					
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:				□Y □	A RINV	A LINE

ADEQ Water NPDES Inspection	AFIN: 17-00062	Permit #: AR0021482

SE	ECTION D: SAMPLING			
PE	RMITTEE SAMPLING MEETS PERMIT REQUIREMENTS		□s Øn	⁄I □U □NA □NE
DE	TAILS: Chain of custody does not indicate that sulfuric acid is utilized with N	or P sam	ple.	
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
а	. SAMPLES REFRIGERATED DURING COMPOSITING:			☑Y □N □NA □NE
b	. PROPER PRESERVATION TECHNIQUES USED:			□Y ☑N □NA □NE
С	. 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	RMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS		Øs □n	И □U □NA □NE
DE	TAILS: Magnetic meter does not require calibration; facility does have	the cert	ification	letter.
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE:			☑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:			☑Y □N □NA □NE
4.	CALIBRATION FREQUENCY ADEQUATE: (Date of last calibration			□Y □N ☑NA □NE
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:			□Y □N ☑NA □NE
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:			☑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
SE	CTION F: LABORATORY			
PE	RMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENT	S	Øs □n	И □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:			□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
а	. LAB NAME: Data Testing	Bio-moni	toring– An	nerican Interplex
b	. LAB ADDRESS: 3434 Country Club Fort Smith	8600 Kan	is Road	
С	PARAMETERS PERFORMED: TSS,TDS, BOD, Chlorides, Nitrites+ Nitrogen, FC, and P	Little Ro	ck ,AR	
8.	BIOMONITORING PROCEDURES ADEQUATE:			☑Y □N □NA □NE
а	. PROPER ORGANISMS USED:			☑Y □N □NA □NE
b	. PROPER DILUTION SERIES FOLLOWED:			☑Y □N □NA □NE
С	. PROPER TEST METHODS AND DURATION:			☑Y □N □NA □NE
d	. RETESTS AND/OR TRE PERFORMED AS REQUIRED:			□y □n ☑na □ne

ADEQ Water NPDES Inspection	AFIN: 17-00062	Permit #: AR0021482

SECTION	I G: EFFLUEI	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS		
	N VISUAL OBS			0_0		Øs □m □	U DNA DNE
	Receiving water			rved.			
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	001 None None None Trace						-
		I	I	l		I .	I
SECTION	H: SLUDGE	DISPOSAL					
SLUDGE	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	TS		Øs □m □	U □NA □NE
DETAILS:	Most recent slu	udge removal w	as performed in	n 2008.	1		
1. SLUDGE	MANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □m	□U □NA □NE
2. SLUDGE I	RECORDS MAINTAINED	O AS REQUIRED BY 40	O CFR 503:			⊠s □m	□U □NA □NE
3. FOR LANE	APPLIED SLUDGE, TY	YPE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):		
SECTION	II: SAMPLIN	G INSPECTION	ON PROCEDI	JRES			
SAMPLE I	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊠NA □NE
DETAILS:							
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				□Y	□N ☑NA □NE
2. TYPE OF	SAMPLE: GRAB:	COMPOSITE:_ N	METHOD: FREQUE	NCY:			
3. SAMPLES	PRESERVED:						□N ☑NA □NE
4. FLOW PR	OPORTIONED SAMPLE	S OBTAINED:					□n ☑na □ne
5. SAMPLE (OBTAINED FROM FACIL	LITY'S SAMPLING DE\	/ICE:				□N ☑NA □NE
6. SAMPLE	REPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				□N ☑NA □NE
7. SAMPLE S	SPLIT WITH PERMITTE	E:					□N ☑NA □NE
	-CUSTODY PROCEDU						□N ☑NA □NE
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□n Øna □ne
0=0=101		***		(=) =	• • • • • • • • • • • • • • • • • • • •		
	J: STORM V						
	/ATER MANAG			-	l e		U ⊠NA □NE
			-	ication, tracked	under permit # A		
	PDATED AS NEEDED:_						ON MA ONE
	INCLUDING ALL DISCH		CE WATERS:				ON MA ONE
	ON PREVENTION TEAM						□N ☑NA □NE
	ON PREVENTION TEAM): 				ON ØNA ONE
	OTENTIAL POLLUTANT		DIENKS:				ON MA ONE
	STORM WATER DISCH						ON MA ONE
	STORM WATER DISCH TRUCTURAL BMPS:	IANGES ARE AUTHUR	IILLU.				□n ☑na □ne
	ION-STRUCTURAL BMFS:	De.					□N ☑NA □NE
	OPERLY OPERATED A						
	ONS CONDUCTED AS						
II. INOFECTI	C. 10 CONDUCTED AS	INLOUINED.					

		FLOW CALCULA	ATION S	SHEET		
Date: N	Α	Time: NA				
	-					
Head in Ir	nches: NA	Feet: NA				
Type & Si	ze of Primary Flo	w Measurement De	evice:			
NA	•					
Name & N	Model of Seconda	ry Flow Measureme	ent Devi	ice:		
Krohne If	coid	-				
Date of la	st Calibration of S	Secondary Flow Dev	vice:			
NA		· ·				
Recorded	Flow at Date & T	ime Listed Above:	NA			(Facility Flow Meter)
						, , ,
Calculate	d Flow at Date &	Time Listed Above:				
(Flow is calcu	lated using flow charts ir	n: ISCO Open Channel Flo	w Measure	ement Handl	oook-5 th E	Edition -Table # 13-6)
	T					
% Error =	Recorded Value		Value	X 100		
70 LIIOI –	Ca	Iculated Value	ated Value			
	I					
% Error =		-		X 100		
/0 LIIOI —				7 100		
% Error =		X 100				
70 LIIOI –		7 100				
% Error =		X 100				
% Error =		%				
Comment	s: Facility utiliz	zes a magnetic flo	w mete	<u>r, certific</u>	cation	was available.

DMR Calculation Check

Reporting Period: From 11 01 01 To 11 01 31

Year Month Day Year Month Day

Parameter Checked: BOD

Concentration Loading Mass **Monthly** Mo. Avg. - lbs/day 7-day Avg. - mg/l Mo. Avg. - mg/l **Reported Value: 136** 8 8 **Calculated Value:** 136 1000.8 **30 Permit Value:** 45

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

DMR Calculation Check

Reporting Period: From 11 02 01 To 11 02 28

Year Month Day Year Month Day

Parameter Checked: TSS

Concentration Loading Mass **Monthly** Mo. Avg. - lbs/day 7-day Avg. - mg/l Mo. Avg. - mg/l **Reported Value:** 220 9 **18** 9 **220 Calculated Value: 18** 1000.8 **30 Permit Value:** 45

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

Water Division NPDES Photographic Evidence Sheet										
Location:	Location: City of Van Buren South POTW									
Photographer	r: Je	eff Ty	ler		Witness:	None				
Photo #	1	Of	2		Date:	05-24-11	Time:	1006		

Description: View of treatment units with standing water.



Photographer:		Jeff Ty	ler	Witness:	Witness: None		
Photo #	2	Of	2	Date:	05-24-11	Time:	1024

Description: Excessive standing water north of clarifiers, limited access to junction box.



VAN BUREN MUNICIPAL UTILITIES

"Providing Water, Sewer, and Sanitation Services"
2806 Bryan Road / P.O. Drawer 1269
Van Buren, Arkansas 72957
479-474-5067 / Fax 479-471-8969
Gary Smith, Director

June 29, 2009

Water Division Enforcement Branch Arkansas Department of Environmental Quality NPDES Enforcement Division 5301 Northshore Drive North Little Rock, AR 72118-5317

Re:

Compliance Evaluation Inspection, May 24, 2011, Van Buren Main Plant,

AFIN: 17-00062

Permit # AR0021482

Dear Sirs:

In response to the Compliance Evaluation Inspection performed by Mr. Jeff Tyler on May 24, 2011;

- 1. The February 9, 2011 chain of custody not being completed was an operator error, sulfuric acid was utilized as a preservative, however; it did not get recorded on the chain of custody. The operator has instructed to review chain of custody forms carefully.
- 2. The excessive standing water located north of the clarifiers is normally present during, and for a period after, a rain event; the area dries up shortly after. (Pictures attached) While the area is dry, we plan to haul in fill material to build up the area around the control valves and the scum box, so that the area will be accessible during a rain event.

If you have any questions or require further information please contact me.

Sincerely,

Utilities Director

Cc: Correspondence file,

Main Plant file,

Steve Dufresne, Operations Superintendent



Pictures taken June 27, 2011



Serving Van Buren and Crawford County since 1893

VAN BUREN MUNICIPAL UTILITIES

Providing Water, Sewer and Solid Waste Services 2806 Bryan Road P.O. DRAWER 1269 VAN BUREN, ARKANSAS 72957





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Water Division Enforcement Branch Arkansas Department of Environmental Quality NPDES Enforcement Division 5301 Northshore Drive North Little Rock, AR 72118-5317



July 7, 2011

Gary Smith City of Van Buren P.O. Drawer 1269 Van Buren, AR 72957

RE: AFIN: 17-00062 NPDES Tracking No.: AR0021482

Dear Mr. Smith:

The Department has received your response to the May 24th 2011 inspection of your facility by our District Field Inspector, Jeff Tyler. 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 contact me at 501-682-0823 or you may e-mail me at suel@adeq.state.ar.us.

Sincerely,

Kevin Suel

Enforcement Analyst

L.W. 81

Water Division Enforcement Branch