

December 17, 2013

Ken Fratesi, Manager West Helena Water Utilities 92 Plaza Street West Helena, Arkansas 72390

RE: Compliance Inspections (Phillips Co)

AFIN: 54-00086 NPDES Permit No.: AR0022021

AR0022021 (SSO) ARR000613

Dear Mr. Fratesi:

On December 4, 2013 I conducted routine compliance inspections of the waste water treatment facility and the sanitary sewer collection system in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. At the time of inspection, the facility and collection system appeared to be in compliance with the applicable regulations.

Please be advised, the current permit requires additional, once per month analysis for Total Phosphorus (TP) and Nitrate + Nitrate Nitrogen (NO3+NO2-N).

If I can be of any assistance, please contact me at (870) 247-5155 or e-mail at henderson@adeq.state.ar.us.

L. Honderson

Sincerely,

Steven L. Henderson District 6 Field Inspector

Water Division

A routine inspection was conducted to determine compliance status with the Arkansas Water and Air Pollution Control Act, the Federal Clean Water Act, and the regulations promulgated thereunder. At the time of inspection, the facility appeared to be in compliance with the applicable regulations.

Name(s) and Signature(s) of Inspector(s) Steven L. Henderson	Agency/Office/Telephone/Fax ADEQ/ White Hall/ (870) 247-5155/ (870) 247-5185	Date December 5, 2013	
Signature of Reviewer Kerri McCabe	Agency/Office/Phone and Fax Numbers ADEQ / NLR / 501-682-0642	Date December 16, 2013	

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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:	☑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: 1 Class III, 1 Class I	⊠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 Øn □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 Øn □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□y □n ☑na □ne

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SI	ECTION D: SAMPLING	
PE	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
	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:	Øy □n □na □ne
a	a. SAMPLES REFRIGERATED DURING COMPOSITING:	⊠y □n □na □ne
b	D. 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	
	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 33 3/4 " Rec. Weir w.	/o cont.
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	✓Y □N □NA □NE
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	Øy □n □na □ne
4.	CALIBRATION FREQUENCY ADEQUATE: Date of last calibration – January 2013	☑Y □N □NA □NE
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Øy □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:	Øy □n □na □ne
SI	ECTION F: LABORATORY	
	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
	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
a	a. LAB NAME: McClelland Consulting Engineers, Inc.	
b	D. LAB ADDRESS: P.O. Box 34087, Little Rock, Arkansas 72203	
c	: PARAMETERS PERFORMED: BOD, pH, TSS, FCB, DO, TP, NO3+NO2-N	
8.	BIOMONITORING PROCEDURES ADEQUATE:	⊠y □n □na □ne
a	n. 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
	I. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	✓Y □N □NA □NE
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BASED ON VISUAL OBSERVATIONS ONLY DETAILS: OUTFALL #: OIL SHEEN	SECTION	G: EFFLUE	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS			
DETAILS: OUTFAIL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COLOR OTHER OOI None None None None None None Clear None SECTION H: SLUDGE DISPOSAL SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS ØS M U NA ONE ESCITION H: SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS ØS M U NA ONE SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: SUBJUDGE RECORDED MAINTAINED AS REQUIRED BY 40 CPR 803: FOR LAND APPLIED SLUDGE. TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE): SECTION I: SAMPLING INSPECTION PROCEDURES SAMPLE RESULTS SAMPLES OBTAINED THIS INSPECTION PROCEDURES SAMPLES OBTAINED THIS INSPECTION PROCEDURES 1. SAMPLES OBTAINED THIS INSPECTION PROCEDURES 1. SAMPLES OBTAINED THIS INSPECTION PROCEDURES S. SAMPLES OBTAINED THIS INSPECTION PROCEDURES 1. SAMPLES OBTAINED THIS INSPECTION PROCEDURES S. SAMPLES OBTAINED THIS INSPECTION PROCEDURES 1. SAMPLES OBTAINED THIS INSPECTION PROCEDURES 1. SAMPLES OBTAINED THOM PROCEDURES OF THE METHOD FREQUENCY: 1. SAMPLES OBTAINED THOM PROCEDURES OF THE METHOD FREQUENCY: 2. TYPE OF SAMPLE: GRAB. GOOD FOR THE METHOD FREQUENCY: 3. SAMPLES OBTAINED THOM PROCEDURES OF THIS INSPECTION PLAN METHOD FREQUENCY: 4. FLOAT PROCEDURES OBTAINED THIS INSPECTION PLAN METHOD FREQUENCY: 5. SAMPLE SPILIT WITH PREMITTEE: 6. SAMPLE SOLIT WITH PREMITTEE: 7. DIN DIN AM METHOD FREVENTION PLAN STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS 8. SECTION J: STORM WATER DOLLUTION PREVENTION PLAN STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS 9. POLLUTION PREVENTION TEAM DENTIFIED: 9. DIN MINA DINE SUPPOPERIOR OF THE MINA DINE METHOD FREVENTION PLAN STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS 9. POLLUTION REVENTION TEAM DENTIFIED: 9. DIN MINA DINE SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: 9. POLLUTION REVENTION TEAM DENTIFIED: 9. DIN MINA DINE 10. BUT OF POTENTIAL DOLLUTAL BURDS: 10. SUPPOPERIOR OF THE METHO							⊠s □m □	lu □na □ne	
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FLOW CALCULATION SHEET										
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Recorded F	low at	Date &	Time	Listea	Above.	105	0			(Facility Flow Meter)
Calculated	Flow at	t Date 8	₹ Time	e Listed	Above:	10	28			
(Flow is calculat						_	_	ent Hand	book-5 th [Edition)
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% Error =	Reco				culated \	/alue	9	X 100		
		C	alcula	ated Va	lue					
		1056			1028					
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O										
Comments:										

DMR Calculation Check

Reporting Period: From 2013 10 01 To 2013 10 31 Year Month Day Year Month Day

Parameter Checked: BOD5

Loading **Concentration** Mass **Monthly** Mo. Avg. - lbs/day Mo. Avg. - mg/l 7-day Avg. - mg/l **Reported Value: 75.2 16.7** 24.8 **75.2 16.7 Calculated Value:** 24.8 250.2 25 **Permit Value:** 40

If calculated value does not equal reported value, explain: EQUAL