

March 11, 2014

John Richardson, Manager Southside Public Water Authority 1401 Batesville Blvd Batesville, AR 72501

RE: Compliance Inspections (Independence Co) AFIN: 32-00515 NPDES Permit No.: AR0050784 CEI AR0050784 CSI

AR0050784 SSO

Dear Mr. Richardson:

On February 19, 2014, I performed routine compliance inspections of the wastewater treatment facility and 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. This inspection revealed the following violations:

Compliance Evaluation Inspection (CEI)

- 1) The facility's monitoring and analytical instruments are not being calibrated. This is a violation of Part II.4 of your permit.
- 2) The facility is not reporting Sanitary Sewer Overflows (SSOs) with their DMRs. This is a violation of Part II.5.D of your permit.

Compliance Sampling Inspection (CSI)

No violations noted for the Compliance Sampling Inspection (see sample results submitted with this report).

Sanitary Sewer Overflow Inspection (SSO)

At Lift Stations B and C, the visual alarms were not clearly visible and there was no emergency contact information posted. This is a violation of Part III.1.A of your permit.

John Richardson, Manager Southside Public Water Authority Page 2

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to **Water-Inspection-report@adeq.state.ar.us.** This 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 documentation (i.e. photos) is due by **March 25, 2014**.

If I can be of any assistance, please contact me at <u>saunders@adeq.state.ar.us</u> or 870-424-3322.

Sincerely,

Sean Saunders District 11 Field Inspector Water Division

€EPA		Form Approved OMB No. 2040-0003					
	VIRONMENTAL PROTECTIO	N AGENCY					
NPDES Compli	ance Inspec	tion 1	Report				
	Section A: Natio	nal Data S	ystem Coding				
Transaction Code NPDES Yr/Mo/Day Inspec. Type Inspector Fac. Type 1 N 2 5 3 A R 0 0 5 0 7 8 4 11 12 1 4 0 2 1 9 17 18 C 19 S 20 1							
A F I N 3 2 - 0 0	5 1 5	Remarks					
Inspection Work Days Facility Evalue 67 69 70	ation Rating 71	BI N 72	QA 74 75	F	Reserved 80		
	Section	B: Facility	Data				
Name and Location of Facility Inspected (For industrial us include POTW name and NPDES permit number) Southside Public Water Authority	ers discharging to POT	W, also	Entry Time/Date 10:00 2/19/2014 9:00 2/20/2014		Permit Effective Date 3/1/2013		
The end of King George St., Batesville AR.			Exit Time/Date 10:45 2/19/2014 11:30 2/20/2014		Permit Expiration Date 2/28/2018		
Name(s) of On-Site Representative(s)/Title(s)/Phone and F				Oth	er Facility Data		
Mark Carlson, Wastewater Plant Supervisor, 870-251-4	110			Lat	at. 35.683737		
Name, Address of Responsible Official/Title/Phone and Fa John Richardson	x Number			Lon	ng91.622734		
Southside Public Water Authority			Contacted	PDS	DS# 076446		
1401 Batesville Blvd Batesville, AR 72501			Yes No				
870-251-2508	Section C: Areas E		uring Inspection isfactory, N = Not Evaluated)				
S Permit S Flow Mea:			verations & Maintenance	S	Sampling		
	oring Program				Pollution Prevention		
	e Schedules	N Pr	etreatment	Ν	Multimedia		
S Effluent/Receiving Waters S Laborator	y	N Sto	orm Water	Ν	Other:		
			tach additional sheets if necessary	7)			
The following violations were noted during	this CEI Inspection	n:					
1. The facilities monitoring and analy	tical instruments a	re not be	eing calibrated.				
2. The facility is not reporting Sanitar							
Name(s) and Signature(s) of Inspector(s)	/Fax Ital Quality		Date				
Sean Saunders	Mountain Hor	ne			March 7, 2014		
	(870) 424-3322	2					
Signature of Reviewer	Agency/Office	e/Phone and	Fax Numbers		Date		
Konzi MS Calu	ADEQ / NLR				March 10, 2014		
Kerri McCabe							

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	
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:	
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:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🖾na 🗇ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	OS ØM OU ONA ONE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	OS OM OU ONA ØNE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
SECTION C: OPERATIONS AND MAINTENANCE TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
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SECTION C: OPERATIONS AND MAINTENANCE TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED DETAILS: 1. TREATMENT UNITS PROPERLY OPERATED: 2. TREATMENT UNITS PROPERLY MAINTAINED: 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 PROVIDED: 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: 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:	ØS M U NA NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	Øy 🗆n 🗆na 🗇ne
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	Øy 🗆n 🗆na 🗇ne
a. SAMPLES REFRIGERATED DURING COMPOSITING:	Øy 🛛 n 🖾 na 🖾 ne
b. PROPER PRESERVATION TECHNIQUES USED:	
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:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: YES TYPE OF DEVICE: 3" Parsha	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	Øy 🗆n 🗆na 🗇ne
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	Øy 🗆n 🗆na 🗇ne
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:	Øy 🗆n 🗆na 🗇ne
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	Øy 🗆n 🗆na 🗇ne
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	
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:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
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:	

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS									
BASED ON	⊠s ⊏	ім 🗆							
DETAILS:					·				
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLO	DR	OTHER	
001	None	None	None	None	None	Clea	r		
					•				
SECTION	H: SLUDGE	DISPOSAL							
SLUDGE D	DISPOSAL MEE	ETS PERMIT F	REQUIREMEN	ГS		⊠s ⊏	ім 🗆		
DETAILS:					·				
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:				ís ⊡m		
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40) CFR 503:				s 🗆 м	Du Dna Øne	
3. FOR LAND	APPLIED SLUDGE, TY	PE 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 ⊏	IM DI	J ∅NA □NE	
DETAILS:									
1. SAMPLES	OBTAINED THIS INSPE	ECTION: <u>Yes</u>					₽Y	On Øna One	
2. TYPE OF S	AMPLE: 🗹 GRAB: pH	, TSS, Ammonia as Ni	trogen, CBOD, Fecal (Coliform, D.O., Flow		ETHOD: F	REQUEN	ICY:	
3. SAMPLES	PRESERVED:								
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:					ΠY	□n Øna □ne	
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	/ICE:						
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:						
7. SAMPLE S	PLIT WITH PERMITTE	Ξ:						Øn Ona One	
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:							
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:				ΩY		
	J: STORM V				I				
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		LIS L	мЦ	J ∅NA □NE	
DETAILS:									
	PDATED AS NEEDED:	_							
	INCLUDING ALL DISCH		CE WATERS:						
	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:								
	DTENTIAL SOURCES A								
	7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:								
	RUCTURAL BMPS:	20.							
	ON-STRUCTURAL BMF								
	ONS CONDUCTED AS I						ЦY	On Øna One	

FLOW CALCULATION SHEET								
Date: 2/20/2014 Time: 10:10								
Head in Inches: Feet: 45								
Type & Size of Primary Flow Measurement Device: 3" Parshall Flume								
			100.01	arsnar		<i>.</i>		
Name & Mo	odel of Seconda	ry Flow Measuremer	nt Device	e: GL	I Interr	national Mode	əl 53	
					1			
Date of last	Calibration of S	Secondary Flow Devi	ce: Ha	as not l	been c	alibrated sinc	e install	
Recorded F	Flow at Date & T	ime Listed Above:	122 GP	M		(Facility Flow Me	eter)	
						<u> </u>		
		Time Listed Above:	129.4 (th -			
(Flow is calculated	ted using flow charts ir	: ISCO Open Channel Flow	Measureme	ent Hand	<u>book-5"' E</u>	<u>Edition)</u>		
	Recorded Valu	ue - Calculated V	alue					
% Error =	Ca	<u> </u>	- X 100 -					
			I					
% Error =	122	- 129.4	`	۲O0 (
70 EII0I =		129.4	/	100				
% Error =		— X 100						
% Error =		X 100						
	-							
% Error =	-5.71	%						
Commonto	. [
Comments	•							

DMR Calculation Check

Reporting Period:	From	2013	1	1	То	2013	1	31	
		Year	Month	Day		Year	Month	Day	
Parameter Checked:		FCB	-						
		Loading				Concen	tration		
		Mass		Monthly					
	Mo.	Avg lbs/	day		. Avg. U/100		7-day A CFU/1	0	
Reported Value:	. <u> </u>	N/A			0.0		0.0)	
Calculated Value:		N/A			0.0		0.0)	
Permit Value:		N/A			1000		200	0	

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period:	From	2013	8	1	То	2013	8	31
		Year	Month	Day		Year	Month	Day
Parameter Checked:		рН	_					
]	Loading Mass				Concen Mon		
	Mo. A	vg lbs/	day	Mi	n. S.U	J .	Max. S	S.U.
Reported Value:		N/A			7.4		7.7	
Calculated Value:		N/A			7.4		7.7	
Permit Value:		N/A			6		9	

If calculated value does not equal reported value, explain:

Water Division NPDES Photographic Evidence Sheet									
Location:	S	Sout	hside	Public W	ater Authority				
Photograph	er:	S	ean S	aunders		Witness:	Southside Pu	blic Water	Authority
Photo #	1		Of	2		Date:	2/20/2014	Time:	11:19
Description	:	F	ence	around L	ft Station C with no emer	rgency conta	ct info or visibl	e alarm.	
						02	20.2014	11:19	
Photograph	er:	S	ean S	aunders		Witness:	Southside Pu	blic Water	Authority
Photo #	2	2	Of	2		Date:	2/20/2014	Time:	11:19
Description	;	A	nothe	er view of	fence in Photo 1.	11			
						02.	SECURITY FENCE 870-733-2582 20 - 20 1 4	11:19	

Water Division Inspection Branch ADEQ,

RE: Compliance Inspection

AFIN 32-000515 NPDES Permit No. AR0050784

Item number one is vague and inaccurate as all monitoring and lab equipment is checked monthly and or yearly. Calibration or replacement is done as required. A call to Sean Saunders ADEQ Inspector clarified what needed to be done, was second party verification for the GLI-HACH Model U53 secondary flow measurement device, and the certified NIST traceable thermometer serial no. K37123.

I checked with the HACH Company, they recommended MOS Environmental for checking the Model 53. Shane Sangli of MOS Environmental was contacted and is coming to check and certify the secondary flow meter. The NIST traceable thermometer has been returned to H-B Instrument Company for verification.

Item number two will be resolved by submitting corrected DMR's using the proper forms which have been sent to me by Alan Anderson ADEQ Water Division.

Attached/enclosed are photographs of Lift Stations "B" and "C" which show the contact information signs and the extensions of the Alarm Lights.

Mark Carlson Wastewater Plant Supervisor Southside Public Water Authority 870-613-3139















April 2, 2014

John Richardson, Manager Southside Public Water Authority 1401 Batesville Blvd Batesville, AR 72501

RE: Response to Inspections (Independence Co) AFIN: 32-00515 Permit No.: AR0050784 CEI AR0050784 CSI AR0050784 SSO

Dear Mr. Richardson:

I have reviewed the response pertaining to my February 19, 2014 inspections of your wastewater treatment facility and collection system. The information provided sufficiently addresses the violations referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

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 (870) 424-3322 ext. 3 or you may e-mail me at <u>saunders@adeq.state.ar.us</u>.

Sincerely,

4

Sean Saunders District 11 Field Inspector Water Division