

March 31, 2014

Ms. Brenda Gills, Utilities Manager City of Arkadelphia PO Box 495 Arkadelphia, AR 71923

**RE:** Compliance Inspections (Clark Co)

AFIN: 10-00463 NPDES Permit No.: AR0020605

NPDES Permit No.: ARR000190

Dear Ms. Gills:

On March 18, 2014, I performed routine compliance inspections of the wastewater treatment facility NPDES permits 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:

## AR0020605

- 1. Your facility uses a contracted laboratory for analyses. The name and address of the laboratory is not included on the Discharge Monitoring Reports (DMRs) as required by Part III, Section C.5 of the permit.
- 2. Chain of Custody (COC) forms are not being properly filled out. They do not have a "relinquished by" signature.

## ARR000190

No violations were noted for the No-Exposure Certification permit.

Brenda Gills City of Arkadelphia WWTP 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 <a href="Water-Inspection-Report@adeq.state.ar.us">Water-Inspection-Report@adeq.state.ar.us</a>. 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 <a href="April 14, 2014.">April 14, 2014.</a>.

If I can be of any assistance, please contact me at (870) 777-7585 ext. 2 or <a href="mailto:smithron@adeq.state.ar.us">smithron@adeq.state.ar.us</a>.

Sincerely,

Red Smith

District 10 Field Inspector

Ruf Sith

Water Division

9	E <b>P</b> A																C	Form A OMB No.		
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	NPDES Compliance Inspection Report																			
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incli City	ne and Location of Facility Inspected ade POTW name and NPDES permit of Arkadelphia WWTP	numi	ber)			chargin	ng to .	POTV	W, also	)	Entry Time/D 1100 / 3-18-2						nit Ef : 1, 20	fective D 012	ate	
Loc	ated east side of 3 <sup>rd</sup> Street 2 miles s	outh	of Ar	kadelph	ia						Exit Time/Da 1545 / 3-18-2						nit Ex 7 <b>31,</b> 2	piration 1 <b>2017</b>	Date	
Dav	Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  David Thomason / WW Superintendent / 870-403-3102 (cell)  Other Facility Data																			
Nan <b>Ms.</b>	Christi Daniel / Lab Tech / 870-246-0697  Name, Address of Responsible Official/Title/Phone and Fax Number  Ms. Brenda Gills / Utilities Mgr. / 870-246-5863  Contacted  Major Municipal  PDS# 076999																			
PO	Clay Street Box 495 adelphia, AR 71923										Yes	No								
			(S	S = Satis							uring Inspection sfactory, N = N		uated)							
S	Permit	S		v Measu				<i>B</i>	s	I	erations & Ma				S	Sam	pling			
U	Records/Reports	S	Self	Monito	ring I	Progra	m		S	Slu	dge Handling/	Disposa	al		S	Pollu	ıtion	Preventi	on	
S	<b>Facility Site Review</b>	N	Con	pliance	Sche	dules			N	Pre	etreatment				N	Mult	imed	ia		
S	Effluent/Receiving Waters	S		oratory					N		rm Water				S	Other: Effluent Limits				
		Se	ection 1	D: Sum	mary (	of Fine	dings	s/Con	nment	s (At	ach additional	l sheets	if nece	sary	)					
Vi	Violations: (1) The name of the contract lab is not on the DMR as required by the permit.  (2) Chain of Custodies do not have "relinquished by signature."																			
	ne(s) and Signature(s) of Inspector(s Smith		K	,		Arka	ansas	Depa		t of E	Fax nvironmental Q hron@adeq.stat		District	10 /		Date <b>Mar</b>		9, 2014		
	Signature of Reviewer  Kerri McCabe  McCalu						Agency/Office/Phone and Fax Numbers ADEQ / NLR / 501-682-0642						Date March 31, 2014							

ADEQ Water NPDES Inspection	AFIN: <b>10-00463</b>	Permit #: AR0020605

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:	Øy □n □na □ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☐S ☐M ☑U ☐NA ☐NE
DETAILS: (1) contract lab name not on DMR. (2) No "relinquished by" signature on chain	of custodies
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:	Øy □n □na □ne
g. DATES AND TIMES OF ANALYSES:	Øy □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:	Øy □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:	Øy □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:	□y □n ☑na □ne

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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:	
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 4.125 ft. rectar weir without end contractions	
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: Weekly by facility & by company on 3-7-2014	☑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
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: Sorrells Research	
b. LAB ADDRESS: 8002 Stanton Road Little Rock, AR	
c. PARAMETERS PERFORMED: Chronic Wet Testing, TP, NO3 + NO2-N	
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

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BASED ON VISUAL OBSERVATIONS ONLY  DETAILS:  OUTFALL R: OIL SHEEN   GREASE   TURBIDITY   VISIBLE FOAM   FLOATING SOLIDS   COLOR   OTHER    OUTFALL R: OIL SHEEN   GREASE   TURBIDITY   VISIBLE FOAM   FLOATING SOLIDS   COLOR   OTHER    OUTFALL R: OIL SHEEN   GREASE   TURBIDITY   VISIBLE FOAM   FLOATING SOLIDS   COLOR   OTHER    OUTFALL R: OIL SHEEN   GREASE   TURBIDITY   VISIBLE FOAM   FLOATING SOLIDS   COLOR   OTHER    OUTFALL R: OIL SHEEP   GREASE   TURBIDITY   VISIBLE FOAM   FLOATING SOLIDS    SECTION H: SLUDGE DISPOSAL   SUBJECT   SUBJECT	SECTION	G: FFFI UFI	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS		
DETAILS:  OUTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM PLOATING SOLIDS COLOR OTHER  OOT NOR NOR GREASE TURBIDITY VISIBLE FOAM PLOATING SOLIDS COLOR OTHER  OOT NOR NOR GREASE TURBIDITY OF SULPHING SOLIDS COLOR OTHER  SECTION H: SLUDGE DISPOSAL  SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS SIS MILL ON A ONE  DETAILS:  1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CPR 803:  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 SIM DU SINA DISE  DETAILS:  1. SAMPLES OBTAINED THIS INSPECTION PROCEDURES  SAMPLE GREAME: GRABE, GOMENSTIE, METHOD, FREQUENCY:  2. TYPE OF SAMPLE: GRABE, GOMENSTIE, METHOD, FREQUENCY:  3. SAMPLES OBTAINED FROM FACILITYS SAMPLING DEVICE:  4. FLOW PROPORTIONED SAMPLES OBTAINED:  5. SAMPLE SPRESSENTATIVE OF VOLUME AND NATURE OF DISCHARGE:  9. YOU SINA DISE  SECTION J: STORM WATER POLLUTION PREVENTION PLAN  STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS  DETAILS:  SECTION J: STORM WATER POLLUTION PREVENTION PLAN  STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS  DETAILS:  SECTION J: STORM WATER POLLUTION PREVENTION PLAN  STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS  DETAILS: SOE INSPECTION FACILITY SAMPLING DEVICE:  1. SWIPP PURPLE AS ADDITIONAL DATE OF THE MEMBER SOLID AND A DISE  SECTION J: STORM WATER DOLLUTION PREVENTION PLAN  STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS  DETAILS: SOE INSPECTION TEAM DENTIFIED:  1. SWIPP PURPLE AND A DISE OF THE MEMBER.  2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:  1. PURPLE MANAGEMENT SOLID AND A DISE OF THE MEMBER.  3. POLLUTION PREVENTION TEAM DENTIFIED:  1. SUPPLY PURPLE AND A DISCHARGES AND SURFACE WATERS:  3. POLLUTION PREVENTION TEAM DENTIFIED:  3. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS.  4. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS.  5. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS.  5. LIST OF POTENT							Øs □m □	U □NA □NE
OUTFALL #: OIL SHEEN GREASE TURBIDITY VISIBLE FOAM FLOATING SOLIDS COLOR OTHER  001						L		
SECTION H: SLUDGE DISPOSAL  SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS  DETAILS:  1. SLUDGE MANAGEMENT ADEQUATE TO MANTAINE FELUENT QUALITY:  2. SLUDGE CORORS MANTAINED AS REQUIRED BY 40 CPR 903:  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  DETAILS:  1. SAMPLES OBTAINED THIS INSPECTION:  2. TYPE OF SAMPLE: GRAB; GOMPOSITE; METHOD: FREQUENCY:  3. SAMPLES OBTAINED SAMPLES OBTAINED.  5. SAMPLE PRESERVED:  4. FLOW PROPORTIONED SAMPLES OBTAINED.  5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:  6. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:  7. SAMPLE SHE WITH FERMITTEE:  8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:  9. SAMPLES OBTAINED FROM FACILITY'S SAMPLING DEVICE:  19. IN ØINA CINE  8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:  9. SAMPLE SHE WITH FERMITTEE:  19. IN ØINA CINE  SECTION J: STORM WATER POLLUTION PREVENTION PLAN  STORM WATER MANAGEMENT MEET'S PERMIT REQUIREMENTS  DETAILS: See inspection for ARRO00190 dated 3-18-2014; "No-Exposure Certification"  1. SKYPPP UPDATED AS NEEDED. DATE OF LAST UPDATE:  19. IN ØINA CINE  2. STORM WATER MANAGEMENT MEET'S PERMIT REQUIREMENTS  DETAILS: See inspection PROPERLY TRAINED:  10. SWAPP PURDATED AS NEEDED. DATE OF LAST UPDATE:  11. SKYPPP UPDATED AS NEEDED. DATE OF LAST UPDATE:  12. STORM WATER MANAGEMENT MEET'S PERMIT REQUIREMENTS  13. SWAPP PURDATED AS NEEDED. DATE OF LAST UPDATE:  14. RON-STORM WATER DOLLUTION PREVENTION PLAN  5. LIST OF POTENTIAL POLLUTANT SOURCES:  17. ALL NON-STORM WATER DOLLUTANT SOURCES:  18. LIST OF POTENTIAL POLLUTANT SOURCES:  19. IN ØINA CINE  19. IN ØINA CINE		OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
SECTION H: SLUDGE DISPOSAL  SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS  DETAILS:  1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAINE EFFLUENT QUALITY:  2. SLUDGE GROORDS MANTAINED AS REQUIRED BY 40 CPR 603:  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  DETAILS:  1. SLAMPLES OBTAINED THIS INSPECTION:  2. TYPE OF SAMPLE:   GRAB;     COMPOSITE;   METHOD:   FREQUENCY:  3. SAMPLES OBTAINED SMPLES OBTAINED  5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:  4. FLOW PROPORTIONED SAMPLES OBTAINED  5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:  5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:  6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:  7. SAMPLES DISTAINED FROM FACILITY'S SAMPLING DEVICE:  8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:  9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:  9. SAMPLES SET WITH PERMITTE:  10. Y								na
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS  DETAILS:  1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE RECORDS MAINTAINED AS RECUIRED BY 40 CPR 603:  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   DIS DIM DU MA DIME							3 **	
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS  DETAILS:  1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE RECORDS MAINTAINED AS RECUIRED BY 40 CPR 603:  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   DIS DIM DU MA DIME								
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SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS  DETAILS:  1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE RECORDS MAINTAINED AS RECUIRED BY 40 CPR 603:  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   DIS DIM DU MA DIME				<u> </u>	<u>I</u>	<u> </u>	l	l
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS  DETAILS:  1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE RECORDS MAINTAINED AS RECUIRED BY 40 CPR 603:  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   DIS DIM DU MA DIME	SECTION	H: SLUDGE	DISPOSAL					
DETAILS:  1. SUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:  2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:  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  DETAILS:  1. SAMPLES OBTAINED THIS INSPECTION:  2. TYPE OF SAMPLE: GRAB. GOMENSITE: METHOD. FREQUENCY:  3. SAMPLES PRESERVED:  4. FLOW PROPORTIONED SAMPLES OBTAINED:  5. SAMPLE OBTAINED FROM FACILITY'S SAMPLIND DEVICE:  6. SAMPLE OBTAINED FROM FACILITY'S SAMPLIND DEVICE:  7. SAMPLE SPLIT WITH PERMITTEE:  8. SAMPLE SPLIT WITH PERMITTEE:  8. SAMPLE SPLIT WITH PERMITTEE:  8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:  9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:  STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS  DETAILS;  1. SUPPOPURATED AS NEEDED. GOVERNOON OF ARROUS ON SURFACE WATERS:  1. STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS  DETAILS;  3. SHOW IN A CONTROL OF A STORM WATER POLLUTION PREVENTION PLAN  STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS  DETAILS; See inspection for ARROUO190 dated 3-18-2014; "No-Exposure Certification"  1. SWPPP UPDATED AS NEEDED. DATE OF LAST UPDATE:  2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:  3. POLLUTION PREVENTION TEAM PROPERLY TRAINED:  4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:  5. LIST OF POTENTIAL POLLUTION SEAR ALL DATES:  6. LIST OF POTENTIAL POLLUTION SEAR ALL DATES:  7. ALL NON-STORM WATER DISCHARGES AND SURFACE WATERS:  8. LIST OF POTENTIAL POLLUTIONS DATES:  9. LIST OF POTENTIAL POLLUTIONS D				REQUIREMEN	TS		⊠s □m □	U □NA □NE
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8. LIST OF STRUCTURAL BMPS:  9. LIST OF NON-STRUCTURAL BMPS:  10. BMPS PROPERLY OPERATED AND MAINTAINED:  11. DY IN MINA INE	6. LIST OF PO	TENTIAL SOURCES A	AND PAST SPILLS AN	D LEAKS:			□Y	□N ☑NA □NE
9. LIST OF NON-STRUCTURAL BMPS:       □Y □N ☑NA □NE         10. BMPS PROPERLY OPERATED AND MAINTAINED:       □Y □N ☑NA □NE	7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	RIZED:				
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	9. LIST OF NO	ON-STRUCTURAL BMF	PS:					
11. INSPECTIONS CONDUCTED AS REQUIRED:	10. BMPS PRO	PERLY OPERATED A	ND MAINTAINED:					
	11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				□Y	□N ☑NA □NE

	FLOW CALCULATION SHEET										
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Comments											

## **DMR Calculation Check**

Reporting Period: From 2013 5 01 To 2013 5 31

Year Month Day Year Month Day

Parameter Checked: BOD5

Concentration Loading **Monthly** Mass Mo. Avg. - lbs/day Mo. Avg. - mg/l 7-day Avg. - mg/l **Reported Value:** 204.0 16.6 18.1 16.6 18.1 **Calculated Value:** 204.0 **Permit Value: 751 30** 45

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

From: <u>Brenda Gills</u>

To: <u>Water-Inspection-Report</u>

Subject: AR0020605

**Date:** Thursday, April 10, 2014 11:36:15 AM

Attachments: ADEQ Inspection Answer.pdf

Please find attached my response to ADEQ's letter of March 31 regarding our inspection violations. I am mailing you the original of this letter today.

Thank you. Brenda Gills



700 Clay Street P. O. Box 495 Arkadelphia, AR 71923 Phone (870) 246-5863 Fax (870) 246-9546

April 10, 2014

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

RE: Compliance Inspection AFIN: 10-00463 AR0020605

Dear Sir:

I have received the letter of March 31 detailing our violations as found in the recent inspection of our above-referenced permit. This letter is my response to the findings.

- We use Sorrells Research in Little Rock for our analyses. We will begin including the labs name and address on our DMR's. For the record, the lab is Sorrells Research, 8100 National Drive, Little Rock, AR 72209.
- 2. Sorrells Research employees pull the required samples. David Thomason, our Wastewater Superintendent, has talked with Cecil Sorrells to insure the Chain of Custody forms will be properly completed. Their employee that takes the samples and brings them to the lab in Little Rock will begin completing the "relinquished by" portion of the COC form.

I appreciate the inspection. Please contact me if there are additional questions or problems.

Sincerely,

Brenda Gills

**Utilities Manager** 



April 25, 2014

Ms. Brenda Gills, Utilities Mgr. City of Arkadelphia PO Box 495 Arkadelphia, AR 71923

**RE:** Response to Inspection (Clark Co)

AFIN: 10-00463 NPDES Permit No.: AR0020605

Dear Ms. Gills:

I have reviewed the response pertaining to my March 18, 2014 inspection of the City of Arkadelphia POTW. 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) 777-7585 ext. 2 or you may e-mail me at <a href="mailto:smithron@adeq.state.ar.us">smithron@adeq.state.ar.us</a>.

Sincerely,

Red Smith

District 10 Field Inspector

Ref Sith

Water Division