

November 26, 2014

Daniel Dawson, General Manager Searcy Water Utilities 300 North Elm Street P.O. Box 1319 Searcy, AR 72145

RE: Searcy WWTF Inspection AFIN: 73-00055 Permit No.: AR0021601

Dear Mr. Dawson:

Over the dates of October 8, 2014, October 9, 2014, and November 21, 2014 Erica McAdoo and I performed a Compliance Evaluation Inspection, Pretreatment Compliance Inspection, and a SSO/Collection System Inspection of the above referenced 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. A copy of the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of the attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to <u>Water-Inspection-Report@adeq.state.ar.us</u>. 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 **December 13, 2014**.

If I can be of any assistance, please contact me at <u>bakerclark@adeq.state.ar.us</u> or (501)682-0657.

Sincerely,

Clark Baker

Clark Baker District 9 Field Inspector Water Division

Inspection Report:	Searcy WWTF.	AFIN: 73-00055.	Permit #:	AR0021601	

		-					DODT
A	WATER DIVISION INSPECTION REPORTAFIN: 73-00055PERMIT #: AR0021601DATE: 10/8/2014						
	AFIN: 73-00055 PERMIT #: AR002160					DATE:	
ARKANSAS		DUNTY: 73 White			#: 081083		MEDIA: WN
			39 LONG: -91.716111 LOCATION: Entrance INSPECTION INFORMATION				
FACILITY INFORMAT	TION		FACILITY TYPE:			RMATIO	N
Searcy WWTF			1 - Municipal 80397 S - State				
260 N. Bypass			FACILITY EVALUATION RATING: INSPECTION TYPE: 3 - Satisfactory Compliance Evaluation				
Searcy			()	TRY TIME:	EXIT TIME: 12:15		FFECTIVE DATE:
RESPONSIBLE OFFI	CIAL	-	10/0/2014 1	1.00	12.15	10/1/2 PERMIT E	2013 XPIRATION DATE:
						9/30/2	
Daniel Dawson / General Manager			FAYETTEVILLE	SHAL	E RELATE	D: N	
Searcy Water Utilities			FAYETTEVILLE				
MAILING ADDRESS: 300 North Elm Street P.O. Box 1319							S
			NAME/TITLE/PHONE/FAX/EMAI		ator Inspor	-tor/(501)	682-0657
Searcy AR 72145 PHONE & EXT: / FAX:					ater mopet	,101/(301)	002-0037
501-268-2481 / 501-268-9463			Erica McAdoo/ADEQ Water Inspector/(501)683-0827				
email: d.dawson@cablelynx.com							
CONTACTED DURING INSPECTION	: Ye	s					
		AREA EVA					
S PERMIT	S	FLOW MEASUF	isfactory, N=Not Applicable/ REMENT	Evaluated S) STORMV	VATER	
S RECORDS/REPORTS	S	LABORATORY		M	FACILITY		EVIEW
M OPERATION & MAINTENANCE	Ν		CEIVING WATER	S			NG PROGRAM
S SAMPLING	N SLUDGE HANDLING/DISPOSAL S PRETREA					ATMENT	
N OTHER:		SIIMMADY (OF FINDINGS				
Vegetation growing within tl	ne u			photo	1-2)		
 Algae on the weirs of the se 			•	P.1010	-,-		
Improper disposal of solids		•	• •	(see	photos 6-9)).	
			COMMENTS	•	•	,	
A water leak in an undergree	oun	d electrical acces	ss area has resul	ted in	electrical	compone	ents of the
system coming into contac	t wi	th water.					
 It appears that the tubing in 		•	•	replac	ced. A bui	ldup of ii	mpurities can
negatively impact the sam	ole r	esults (see phot	o 10).				
Clark	Rak	No					
INSPECTOR'S SIGNATURE:		Clark Baker				DATE	: 11/25/2014
	/						
	en R	then brand					
SUPERVISOR'S SIGNATURE: 7		Jas	on Bolenbaugh			DATE	: 11/25/2014

Inspection Report: Searcy WWTF, AFIN: 73-00055, Permit #: AR0021601

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ONE
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	□S ØM □U □NA □NE
DETAILS:	
 ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: <u>The Monthly average loading mass for TSS in</u> <u>August was incorrectly reported on the DMR due to an incorrect flow rate used when calculating the load</u> <u>mass for 8/13/2014.</u> The actual value is still less than the permit limit 	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🖾na 🖾ne
a. DATES AND TIME(S) OF SAMPLING:	DY 🗹 N 🗆 NA 🗆 NE
b. EXACT LOCATION(S) OF SAMPLING:	Øy ⊡n ⊡na ⊡ne
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:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	OS ØM OU ONA ONE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs Om Ou Ona One
2. TREATMENT UNITS PROPERLY MAINTAINED: Vegetation in treatment units. Some algae on the weirs of the secondary clarifier, the brushes on the scraper used to prevent the buildup of algae may need to be replaced. There is evidence of algae and other solids recovered from the secondary clarifier being wasted on the ground instead of being properly disposed of.	⊡s Øm ⊡u ⊡na ⊡ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆m 🗇u 🖾na 🗇ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗆m 🗇u 🖾na 🗇ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆m 🗇u 🖾na 🗇ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	Øs 🗆m 🗇u 🖾na 🗇ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🗇ne
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:	DY 🗹N DNA DNE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	DY DN ØNA DNE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	Dy On Øna One
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: 8/10/2014 - 8/12/2014	Øy 🛛 n 🗆 na 🖾 ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	Øy 🛛 n 🗆 na 🖾 ne
A water leak in an underground electrical access area has resulted in electrical components of the system coming	into contact with water.

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
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:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
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	ØS OM OU ONA ONE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 2ft parshall flume	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Øy 🗆n 🗆na 🗇ne
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	ØS OM OU ONA ONE
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: American Interplex & I Arkansas Testing	
b. LAB ADDRESS: 8600 Kanis Road, Little Rock, AR 72204 I 3301 Langley Dr., Searcy, AR 72	143
c. PARAMETERS PERFORMED: Phenolics, Cyanide, and Biomonitoring I Nitrite+Nitrate & Phosphorus ar	nalysis
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	Øy 🛛 n 🖓 na 🖓 ne
b. PROPER DILUTION SERIES FOLLOWED:	Øy 🛛 n 🖓 na 🖓 ne
c. PROPER TEST METHODS AND DURATION:	Øy 🛛 n 🖓 na 🖓 ne
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Øy 🛛 n 🖾 na 🖾 ne

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS								
BASED ON VISUAL OBSERVATIONS ONLY								
DETAILS:								
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001				x				
						•		
SECTION H	: SLUDGE DIS	POSAL						
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	ГS				
DETAILS:								
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m		
2. SLUDGE R	ECORDS MAINTAINE	DAS REQUIRED BY 40) CFR 503:			⊠s ⊡m		
3. FOR LAND	APPLIED SLUDGE, T	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):			
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES					
SAMPLE R	ESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊡NA ⊠NE	
DETAILS:								
1. SAMPLES	OBTAINED THIS INSP	ECTION:				ΠY	🗆 n 🗆 na 🗹 ne	
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:				
3. SAMPLES	PRESERVED:					ΠY	⊡n ⊡na Øne	
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:				ΠY	⊡n ⊡na Øne	
5. SAMPLE O	BTAINED FROM FACII	LITY'S SAMPLING DE	/ICE:			ΠY	🗆 n 🗆 na 🗹 ne	
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			ΠY	🗆 n 🗆 na 🗹 ne	
7. SAMPLE SI	PLIT WITH PERMITTE	E:				ΠY	🗆 n 🗆 na 🗹 ne	
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				ΠY	□n □na Øne	
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY	On Ona Øne	
		ER POLLUTION			I			
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		ØS 🗆 M 🗆		
DETAILS:								
1. SWPPP UP	DATED AS NEEDED:	_ DATE OF LAST UP	DATE:			₽Y		
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			₽Y	ON ONA ONE	
3. POLLUTION	N PREVENTION TEAM	IDENTIFIED:				₽Y		
4. POLLUTION	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:							
5. LIST OF PC	DTENTIAL POLLUTAN	F SOURCES:					On Ona One	
6. LIST OF PC	DTENTIAL SOURCES	AND PAST SPILLS ANI	D LEAKS:					
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:					
8. LIST OF ST	RUCTURAL BMPS:					ΠY		
9. LIST OF NO	ON-STRUCTURAL BMF	PS:					□n □na Øne	
10. BMPS PRO	PERLY OPERATED A	ND MAINTAINED:						
11. INSPECTIC	NS CONDUCTED AS	REQUIRED:				ΠY		
1								

DMR Calculation Check

Reporting Period:	From	<u>2014</u> Year	7 Month	1 Day	_ To	2014 Year	7 Month	<u>31</u> Day
Parameter Checked:		CBOD5	-					
		Loading Mass					ntration hthly	
	Mo.	Avg Ibs/c	lay	Mo. A	vg I	ng/l	7-day Avg	J mg/l
Reported Value:		181.9			6.0		6.4	
Calculated Value:		181.9			6.0		6.4	
Permit Value:		625.5			15		22.	5

If calculated value does not equal reported value, explain:

DMR Calculation Check

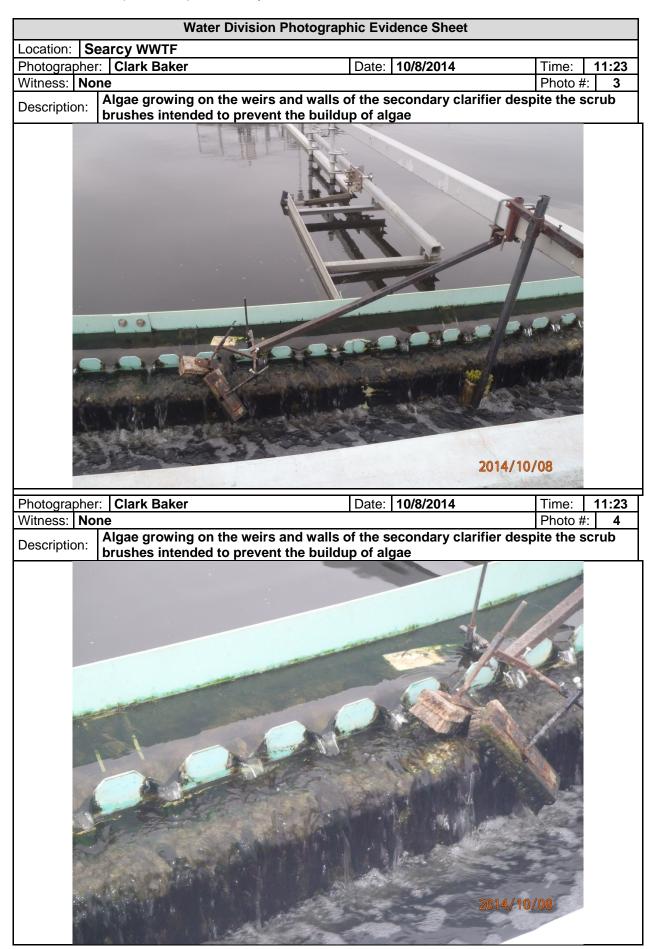
Reporting Period:	From	2014 Year	<u>8</u> Month	1 Day	_ To _	2014 Year	8 Month	31 Day
Parameter Checked:		TSS	-					
		Loading Mass				Concer Mon		
	Mo.	Avg Ibs/d	lay	Mo. A	vg r	ng/l	7-day Avg	mg/l
Reported Value:		99.9			4.3		5.4	
Calculated Value:		102.9			4.3		5	
Permit Value:		834			20		30	

If calculated value does not equal reported value, explain:

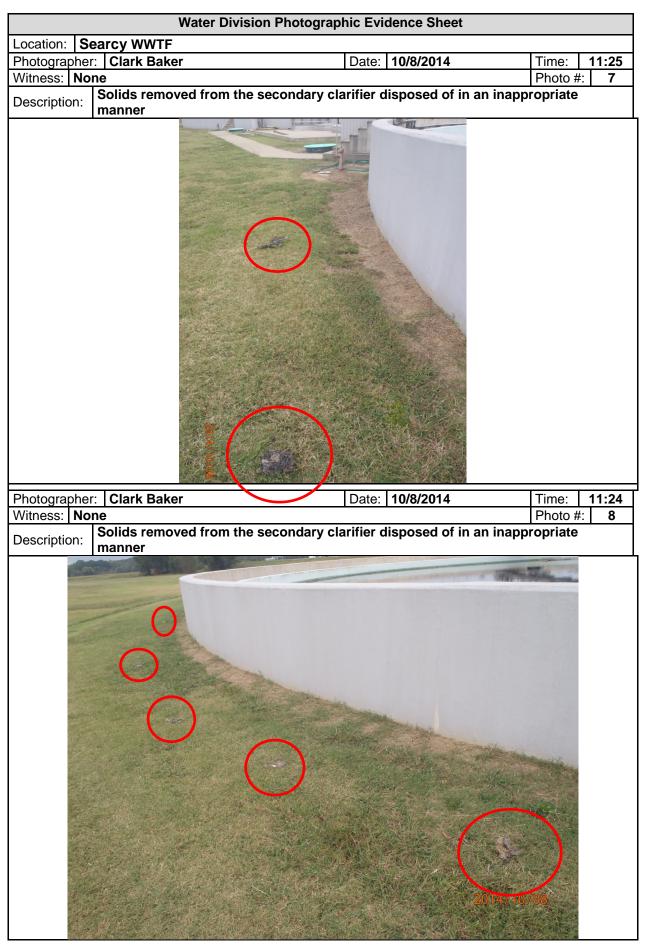
The monthly average loading mass for TSS in August was calculated multiple times by hand and using a calculating spreadsheet resulting in a value of 102.9 each time. The same was done for the highest 7-day average of TSS in August resulting in a value of 5 each time. It is unknown how the facility calculated the values reported on the DMR for TSS in August. Tim Cleveland, assistant manager, was contacted inquire about the differing results. He explained that the week with 5.4 mg/l average was one that had all of the values recorded at the end of July, but since the Friday and Saturday, which they consider the end of the week, were in August that week is considered to be an August week. The monthly average loading mass reported on the DMR was found to be incorrect due to an incorrect flow value used when calculating the loading mass for the 13th.

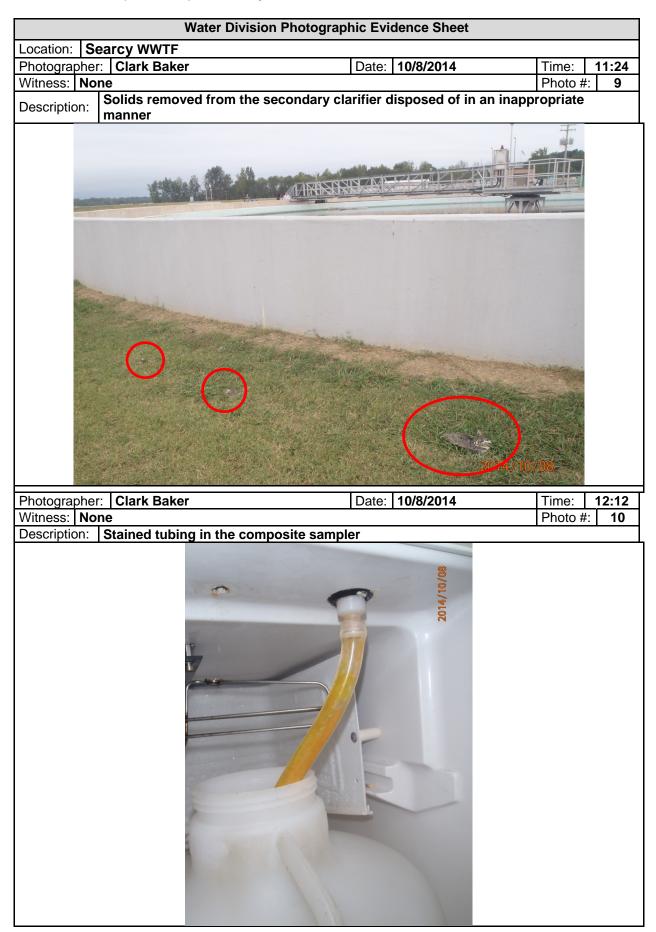
	Water Division Photogra	aphic Evidence Sheet	
	cy WWTF		
Photographer:	Clark Baker	Date: 10/8/2014	Time: 11:17
Witness: None Description: Ve	egetation growing in treatment unit	s of the system	Photo #: 1
Photographer:	Clark Baker	Date: 10/8/2014	Time: 11:15
Witness: None			Photo #: 2
	egetation growing in treatment unit	s of the system	

Inspection Report Page 8 of 13









Inspection Report: **Searcy WWTF**, AFIN: **73-00055**, Permit #: **AR0021601** Google Earth image of the area:



BOARD MEMBERS Ronnie McFarland Mel Sansom Steve Lightle Donnie Miller Reynie Rutledge

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GENERAL MANAGER Daniel K. Dawson

ASSISTANT GENERAL MANAGER Tim W. Cleveland

December 10, 2014

CERTIFIED MAIL, Return Receipt Requested: 7010 2780 0002 5135 3473

Mr. Clark Baker Water Division Inspection Branch ADEQ 5301 Northshore Dr. North Little Rock, AR 72118-5317

Re: NPDES Permit No. AR0021601 AFIN: 73-00055

Dear Mr. Baker:

Please find enclosed with this letter copies of emails from Mr. Jimmy Smith and Mr. Paul Abernathy addressing the Findings as noted in your Inspection Reports sent to us under a letter dated November 26, 2014.

We hope this adequately addresses the concerns noted in said report. Please contact Jimmy, Paul, or myself if there is anything further we need to do to address these matters.

Sincerely,

SEARCY WATER UTILITIES

Daniel K. Dawson General Manager

Enclosures

Subject: Response to ADEQ Inspection From: "Jimmy Smith" <jsmith67@cablelynx.com> Date: 12/1/2014 9:31 AM To: "Daniel Dawson" <d.dawson@cablelynx.com>

Mr. Dawson,

In reference to the findings of ADEQ during an inspection conducted Friday, November 21, 2014 at the Baker / Hughes Industry by ADEQ representative, Clark Baker, Searcy Water Utilities sewer line maintenance and repair Supervisor, Keith West and Searcy Water Utilities Pretreatment Coordinator, Jimmy Smith

Representatives from Baker / Hughes were present on the day of the inspection after we found the evidence of the "oil " in the lift station.

We inspected Baker / Hughes Oil and Water Separators and found the same type of liquid.

After reviewing the blue prints of Baker / Hughes sewer system and confirming that it was most probable that an event occurred that led to the petroleum based substance exiting the oil and water separators and flowing to the pump station, I contacted Mr. Alan Manley of Baker / Hughes and requested that Baker / Hughes promptly take measures to pump the substance out of the pump station, clean the two oil and water separators and make sure that the oil and water separators are working properly according to the manufacturers specifications.

On Monday, November 24, 2014, Mr. Manley of Baker Hughes informed me that the above mentioned substance in the pump station and oil and water separators would be pumped out taken by a company that would dispose of the matter appropriately.

Mr. Manley called me again on the same day, around 3 pm, and informed me that the matter had been taken care of and they would be performing maintenance on their oil and water separators to make sure this event does not occur in the future.

Sincerely,

Jimmy Smith

Searcy Water Utilities Pretreatment Coordinator / Safety Director P.O. Box 1319 Searcy, Ar. 72145 Office: 501-268-2481 Fax:: 501-268-9463 Subject: WWTF Response From: Paul Abernathy <pabernathy1@outlook.com> Date: 12/10/2014 9:05 AM To: "d.dawson@cablelynx.com" <d.dawson@cablelynx.com>

Searcy WWTF Permit# AR0021601

Issues and actions from ADEQ inspection of 10/8/2014

Issue #1 Vegetation growing within treatment units.

Action taken: Vegetation on anoxic zone baffles and secondary clarifier weirs have been removed and disposed of properly. Cleaning scheduled frequency has been increased. Operators have been instructed concerning proper disposal of vegetation.

Issue #2 Algae on secondary clarifier weirs.

Action Taken: Algae has been removed and disposed of properly. Weir brushes have been replaced. The weirs are now being constantly chlorinated to prevent regrowth.

Issue #3 Improper disposal of solids from weir.

Action Taken: Operators have been instructed on proper disposal areas.

Issue #4 Underground water leak in electrical area.

Action Taken: A leak in the potable water line around the Secondary clarifier has been found and line has been disconnected. Water leaking from conduit has ceased. Water line has been scheduled for repair.

Issue #5 Composite sampler tubing requiring attention.

Night operators have been notified concerning the tubing, and it has been replaced. Regular scheduled sample maintenance frequency has been increased.

Paul Abernathy Manager Searcy WWTP



Mr. Clark Baker Water Division Inspection Branch ADEQ 5301 Northshore Dr. North Little Rock, AR 72118-5317

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