

ADEQ

ARKANSAS
Department of Environmental Quality

March 16, 2015

JW Green, Mayor
Stuttgart WWT Facility
612 S. College
Stuttgart, AR 72160

RE: Stuttgart WWT Facility Inspection (Arkansas Co)
AFIN: 01-00214 NPDES Permit No.: AR0034380

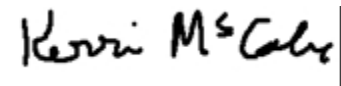
Dear Mayor Green:

On March 11, 2014, I performed a Reconnaissance 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 case has been referred directly to the Water Division Enforcement Branch for further review. All correspondence should be routed through to Richard Healey, Enforcement Branch Manager, at (501) 682-0649 or healeyr@adeq.state.ar.us.

If I can be of any assistance, please contact me at mccabe@adeq.state.ar.us or (501) 682-0642.

Sincerely,



Kerri McCabe
Inspector Supervisor
Water Division

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT				
		AFIN: 01-00214		PERMIT #: AR0034380		DATE: 3/11/2015
		COUNTY: 01 Arkansas		PDS #: 082569		MEDIA: WN
		GPS LAT: 34.493917 LONG: -91.564159 LOCATION: Entrance				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: Stuttgart WWT Facility LOCATION: 1011 West 10th Street CITY: Stuttgart, AR 72160			FACILITY TYPE: 1 - Municipal			
			INSPECTOR ID#: 84022 S - State			
			FACILITY EVALUATION RATING: 1 - Unsatisfactory		INSPECTION TYPE: Reconnaissance	
			DATE(S): 3/11/2015	ENTRY TIME: 09:45	EXIT TIME: 11:15	
			PERMIT EFFECTIVE DATE:			
RESPONSIBLE OFFICIAL						
NAME / TITLE: JW Green / Mayor COMPANY: Stuttgart WWT Facility MAILING ADDRESS: 612 S. College CITY, STATE, ZIP: Stuttgart AR 72160 PHONE & EXT. / FAX: 8706733246 / EMAIL: stuttgartarwater@centurytel.net			PERMIT EXPIRATION DATE: FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: Yes			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Danny Wilson/Stuttgart WWT Facility/Class IV Operator (Lis# 001938) Steven Henderson/District 6 ADEQ Water Inspector			
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
N	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER	
N	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW	
U	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM	
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT	
**	OTHER:					
SUMMARY OF FINDINGS						
<p>The following violations were noted during the inspection:</p> <p>1.) A breach in the flow EQ basin was allowing the discharge of untreated wastewater into an unnamed irrigation ditch, thence to King Bayou, thence to Bayou Meto, and thence to the Arkansas River (Segment 3B). This is a violation of A.C.A. § 8-4-217 (a)(2), which states, "It shall be unlawful for any person to place or cause to be placed any sewage, industrial waste, or other wastes in a location where it is likely to cause pollution of any waters of this state."</p> <p>2.) This breach in the flow EQ basin resulted in an unpermitted discharge of untreated wastewater to the receiving stream (unnamed irrigation ditch). This is a violation of A.C.A. § 8-4-217 (b)(1)(E), which states, "It shall be unlawful for any person to engage in any of the following acts without having first obtained a written permit from the department to discharge sewage, industrial waste, or other wastes into any of the waters of this state."</p> <p>3.) A distinct debris line of grit and floatables was noted at the top of the flow EQ basin; indicating high-water levels in the basin. Adequate freeboard in ponds is a type of Best Management Practice (BMP) that protects pond levee integrity. Furthermore, the inner levee is not protected from wave action or burrowing animal activity (i.e., use of rip-rap). Lack of BMPs has resulted in a breach of the flow EQ basin. This is a violation of Part II, 6 of the permit.</p> <p>4.) The flow EQ basin levees have not been maintained. This lack of maintenance has resulted in a breach of the levee and an unpermitted discharge of untreated wastewater into the receiving stream (unnamed irrigation ditch). This is a violation of Part III, Section B, 1 of the permit.</p>						

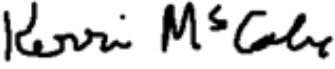

5.) The facility needs to update the contact information for the NPDES permit to the ADEQ Water Division Permits Branch. Please contact Kim Fuller, Permit Engineer Supervisor, at (501) 682-0643 or fuller@adeq.state.ar.us. Applicable forms are located at the following link: http://www2.adeq.state.ar.us/water/forms_inst.htm

GENERAL COMMENTS

On March 9, 2015, District 6 Inspector Steven Henderson notified me that during a complaint investigation, he noted an unpermitted discharge of untreated wastewater into waters of the State due to a breach in the facility's flow EQ basin levee. Personnel at the facility had reported it to ADEQ Water Division Enforcement Branch (Deb Gerst) as a Sanitary Sewer Overflow (SSO); however, they were notified that this condition was not an SSO resulting from a collection system. The Enforcement Branch was notified same day that the Inspection Branch would be collecting samples of the unpermitted discharge of untreated wastewater at the facility March 11, 2015.

On March 11, 2015, Inspector Henderson and I arrived at the facility at approximately 0945. We were assisted by Operator Danny Wilson with Stuttgart WWT Facility. We went to the flow EQ basin levee breach, which was actively discharging untreated wastewater into waters of the State. This location is not the facility's permitted outfall, and the unpermitted discharge was occurring downstream of the permitted outfall in the receiving stream. It was noted that a distinct line of grit and floatables were present at the top of the flow EQ basin levees; indicating that the EQ basin had experienced high-water levels. Excessive high-water levels compromise levee integrity. The flow EQ basin inner levees are not protected with rip-rap or other structural controls to prevent wave action, burrowing, etc. The facility had made no attempts to slow the flow of the unpermitted discharge from the breached levee. They stated saturated conditions were making it difficult to get equipment to the location. When asked about a timeline for remediation, Mr. Wilson stated that they expected to cease the unpermitted discharge mid-April 2015 and have the levee repaired completely by early May 2015.

Samples were collected at the following locations (see attached Google Earth image): at the flow EQ basin breach (Discharge), upstream of the WWTP permitted outfall in the receiving stream (with a duplicate at this location), and downstream of the unpermitted discharge and the WWTP permitted outfall in the receiving stream. The following parameters were sampled and will be included in a separate report once results are received from the ADEQ lab: Biological Oxygen Demand (BOD), Total Suspended Solids (TSS), Fecal Coliform Bacteria (FCB), Dissolved Oxygen (DO), Temperature, and pH.

INSPECTOR'S SIGNATURE: 	Kerri McCabe	DATE: 3/12/2015
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 3/16/2015

Water Division Photographic Evidence Sheet

Location:	Stuttgart WWT Facility		
Photographer:	Kerri McCabe	Date:	March 11, 2015
Time:	1023	Witness:	District 6 Inspector Henderson
Photo #:	1	Description:	Breach in flow EQ basin at Stuttgart WWT Facility; facing away from flow EQ basin.



03, 11, 2015 10:23

Photographer:	Kerri McCabe	Date:	March 11, 2015
Time:	1024	Witness:	District 6 Inspector Henderson
Photo #:	2	Description:	Breach in flow EQ basin at Stuttgart WWT Facility; facing toward flow EQ basin.



03, 11, 2015 10:24

Water Division Photographic Evidence Sheet

Location:	Stuttgart WWT Facility		
Photographer:	Kerri McCabe	Date:	March 11, 2015
Time:	1025	Witness:	District 6 Inspector Henderson
Photo #:	3	Description:	Close-up of breach in flow EQ basin levee with flow of untreated wastewater.



Photographer:	Kerri McCabe	Date:	March 11, 2015
Time:	1024	Witness:	District 6 Inspector Henderson
Photo #:	4	Description:	Unpermitted discharge of untreated wastewater into receiving stream; downstream (left) and upstream (right).



Water Division Photographic Evidence Sheet

Location:	Stuttgart WWT Facility		
Photographer:	Kerri McCabe	Date:	March 11, 2015
Time:	1050	Witness:	District 6 Inspector Henderson
Photo #:	5	Description:	Upstream sample location; facing upstream of the receiving stream and away from WWTP.



Photographer:	Kerri McCabe	Date:	March 11, 2015
Time:	1107	Witness:	District 6 Inspector Henderson
Photo #:	6	Description:	Downstream sample location; facing upstream of receiving stream and toward WWTP.



Figure 1. Google Earth image dated Nov 20, 2012 of Stuttgart WWT Facility, flow EQ basin breach and unpermitted discharge sample location, upstream sample location, and downstream sample location.

